

**Renewable Energy & Human Rights Benchmark 2023  
Company Profile**

**Company name** Vestas  
**Sub-sector** Wind turbine manufacturer  
**Overall score** 39.4% weighted average

Section score	Weighting	For section
64.7%	20%	1. UNGP core indicators
26.8%	40%	2. Salient human rights risks
N/A	20%	3. Serious allegations
N/A	20%	4. ACT assessment as conducted by the World Benchmarking Alliance*

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: [business-humanrights.org](https://business-humanrights.org)

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 2023 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 2022 CHRB methodology (20% of total)**

**A. Policy commitments and governance**

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: General HRs commitment: The Company states 'Vestas commits to respecting human rights: we avoid infringing on human rights and we address adverse human rights impacts with which we may be involved'. [Vestas Human Rights Policy, 10/12/2019: <a href="https://vestas.com">vestas.com</a> ] Score 2 • Met: Commitment to UNGPs: The Company states that 'we are committed to the UN Guiding Principles on Business and Human Rights.' [Vestas Human Rights Policy, 10/12/2019: <a href="https://vestas.com">vestas.com</a> ]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commitment to ILO core principles: The Company states that 'we respect all internationally recognised human rights, including the [...] ILO Declaration on Fundamental Principles and Rights at Work'. [Vestas Human Rights Policy, 10/12/2019: <a href="https://vestas.com">vestas.com</a> ] • Met: Explicitly lists all four ILO core principles: In its Employee Code of Conduct the Company lists all four ILO core principles. [Vestas Employee Code of Conduct, 09/2021: <a href="https://vestas.com">vestas.com</a> ] Score 2 • Met: Expects suppliers to commit to ILO core principles: See below. [Supplier code of Conduct, 2021: <a href="https://vestas.com">vestas.com</a> ]

\* For information on the ACT methodology and scoring criteria please refer to the [World Benchmarking Alliance](https://worldbenchmarkingalliance.org).

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Explicitly lists all four ILO core principles for suppliers: The Company requires its suppliers to commit to all four ILO core principles. [Supplier code of Conduct, 2021: <a href="https://vestas.com">vestas.com</a>]</li> </ul>
A.1.4	Commitment to remedy	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commitment to remedy adverse HRs impacts: The Company states that 'we commit to remedy adverse impacts on individuals, workers, and communities that the company has caused or contributed to.' [Vestas Human Rights Policy, 10/12/2019: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: Expects suppliers to make this commitment: The Company provided the following evidence to the BHRRC: 'Our suppliers are responsible for conducting due diligence to identify and manage potential risks related to human rights, the environment, and business ethics in their supply chain. This includes having appropriate policies, responsible supply chain management systems, and grievance mechanisms proportionate to the size of the supplier and the complexity and risk of the business environment.' However, the document does not contain a requirement for suppliers to commit to remedy adverse human rights impacts. The Company further refers to information on its website, however those statements cannot be considered for this section as they are not made in a public policy document. [Supplier code of Conduct, 2021: <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Commitment to collaborate with judicial or non-judicial mechanisms: The Company provided the following evidence to the BHRRC: 'Vestas is committed [...] to collaborating with judicial and non-judicial mechanisms when necessary.' In future assessments, the Company will be expected to have embedded this commitment in a policy document. [Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Met: Commitment to work with suppliers on remedy: The Company provided the following evidence to the BHRRC: 'Where adverse impacts are committed by third parties with links to Vestas through our services, we seek to use our leverage to ensure that those impacted are remedied. For this purpose, Vestas has in place an Operational Grievance Mechanism (OGM) during the construction of our wind farm projects. The OGM is available without obstructing access to other remedies.' In future assessments, the Company will be expected to have embedded this commitment in a policy document. [Vestas Social Management System, 2022: <a href="https://vestas.com">vestas.com</a>]</li> </ul>
A.2.1	Commitment from the top	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Board level responsibility for HRs: Vestas' Board of Directors, approves policies, procedures, and controls in key areas including human rights. Our Human Rights Policy, Employee and Supplier Codes of Conduct, and DEIB Policy are signed by the Chairman of our Board of Directors. The Board or Executive Management annually review these documents to confirm we have the right governance processes in place. Furthermore, the Audit Committee is responsible for overseeing Vestas' status on compliance with the Corporate Social Responsibility (CSR) elements included in our Code of Conduct.' However, it is unclear if the board has a clear responsibility of reviewing the human rights policies. Furthermore, it is not clear which parts of the Code of Conduct the Company considers to be 'CSR elements' and whether those include human rights. The Company provided the following evidence to BHRRC: 'The Board or Executive Management annually review these documents to confirm we have the right governance processes in place.' However, this indicator requires evidence of oversight at board level. The Board of Executive Management is an executive level body. [Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: Describes HRs expertise of Board member</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Board member/CEO signal importance of HRs in their communications: The Company provided further information to the BHRRC, however, it did not meet the criteria for the assessment. This indicator is looking for statements on human rights made outside of the company's general reporting on human rights or human rights policies. The CEO or board member would be expected to make a statement that is focused on human rights as the core subject and how it relates to the company.</li> </ul>

## B. Embedding respect and human rights due diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Score of 1 on A.1.2.a</li> <li>• Met: Senior responsibility for HRs implementation and decision making: The Company states that 'The Compliance &amp; CSR department works to embed human rights management across the organisation. This includes the day-to-day responsibility of developing and updating the Human Rights Policy, Human Rights Due Diligence, and monitoring legal trends and expectations in the human rights landscape to embed them into our business.' In addition, Kristian Heydenreich is described as Global Head, Compliance &amp; CSR. [Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes day-to-day responsibility for implementing HRs commitments: The Company states that 'The implementation of Vestas' policies and procedures, but also the integration of responses to salient human rights, is done in collaboration with different levels of stakeholders across the company. For example, with the sustainability department at a strategic level, with regional legal teams for the execution of regional compliance programs, with Sustainable Procurement for upstream management of salient human rights and with Sales and Construction teams at the wind farm project level.' The Company further states that 'The Compliance &amp; CSR department works to embed human rights management across the organisation. This includes the day-to-day responsibility of developing and updating the Human Rights Policy and Human Rights Due Diligence, and monitoring legal trends and expectations in the human rights landscape to embed them into our business.' [Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Met: Day-to-day resources and expertise allocation in own operations: The Company gives the example of the sustainability department being involved with implementation of the human rights policies at a strategic level and regional teams being involved with the execution of regional compliance programs. The Company further states that 'The Compliance &amp; CSR department works to embed human rights management across the organisation. This includes the day-to-day responsibility of developing and updating the Human Rights Policy and Human Rights Due Diligence, and monitoring legal trends and expectations in the human rights landscape to embed them into our business.' [Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Met: Resources and expertise allocation in supply chain: The Company indicates that the Sustainable Procurement department is involved with the upstream management of salient human rights issues. The Company further indicates that it has 'dedicated two specific social sustainability experts of our team as part of our commitment to implementing the 2022 HRA recommendations.' [Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>] &amp; [Supplier Sustainability webpage: <a href="https://vestas.com">vestas.com</a>]</li> </ul>
B.2.1	Identifying human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes process of identifying risks in own operations: The Company indicates that conducts HRA which maps out actual and potential HR risks that might impact rightsholders. The first of these assessments was conducted in 2018 and the process was reviewed and developed since then. It describes the process to consist of 'desktop research, an analysis of internal management processes, and interviews. The new assessment evolved to include interviews with external stakeholders who represent relevant rightsholder groups such as indigenous peoples and workers, in addition to our senior management and internal subject matter experts. The 2022 assessment also included our new development business function, in addition to the manufacturing, construction and service operations units'. The Company indicates that the process is applied across all its activities. [Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>] &amp; [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Met: Describes process for identifying risks in business relationships: The Company indicates that the above is applied across all its activities and the Company's value chain. It further states that 'in 2022 we initiated the revision of our risk matrix for direct suppliers with the aim to strengthen it by including more risk indices within Human Rights. A "Sustainability Risk Supplier" is defined by their potential to cause an adverse social and/or environmental impact, while also considering our dependency on the supplier. [...] To determine their risks, we are using country risk data, commodity risk, and specific integrated ESG factors.'</li> </ul>

## B. Embedding respect and human rights due diligence

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			<p>[Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>] &amp; [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes global risk identification system incl. stakeholder consultation: See above. The Company also states that 'Since 2018, the assessment has evolved to include interviews with external stakeholders representing relevant rightsholder groups such as indigenous peoples and workers, besides Vestas' senior management and internal subject matter experts.' It further states that 'Vestas aims to engage with external experts to conduct our corporate-wide Human Rights Assessment (HRA) as a minimum every three years. Conducting the assessments on a regular basis allows us to identify and assess emerging human rights risks and impacts, to integrate findings into business practices as the business evolves while also tracking and communicating progress.' [Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>] &amp; [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: Describes how risk identification system is triggered by new circumstances: The Company states 'Vestas aims to engage with external experts to conduct our corporate-wide Human Rights Assessment (HRA) as a minimum every three years [...] The 2022 assessment also included the two new areas of our business, namely Offshore and Development activities in addition to Supply Chain and Manufacturing, Construction, and Service' However, this indicator is looking for a description of how the risk identification process is conducted proactively when there are major changes to the company's activities, locations, or similar criteria. The Company further discloses that it conducts due diligence for every new supplier, 'covering business ethics and sanctions'. However, this subindicator is looking for new circumstances triggering the global risk identification system rather than due diligence investigations of individual suppliers' business ethics. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: Describes risks identified in relation to new circumstances: The Company discloses risks identified in its 2022 HRA. However, it is not clear which of these were identified in the context of the new areas of business. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>] &amp; [2022 Modern Slavery Statement: <a href="https://vestas.com">vestas.com</a>]</li> </ul>
B.2.2	Assessing human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes assessment process and discloses salient HRs risks: To assess the identified risks the Company states that 'Each salient issue was prioritised according to two sets of criteria: the salience of risk (scale, scope, remediability, likelihood) and relevance for business action (attribution, leverage, risk history, current management). Depending on the salience of risk and the relevance for business action each salient human rights issue was assigned a priority level. [...] The assessment also recognised that these issues can be particularly salient to vulnerable groups of rightsholders such as migrant workers, indigenous and tribal peoples, temporary workers, and low-income populations.' [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>] &amp; [Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Met: Describes how process applies to supply chain: The Company indicates that the HRA, of which the risk assessment process outlined above is a part, is conducted across the Companies activities and value chain. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>] &amp; [Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Met: Public disclosure of results of HRs risk assessment: The Company has a publicly available table listing its salient human rights issues. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>] &amp; [Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how assessment involved affected stakeholders: The Company states that 'Since 2018, the assessment has evolved to include interviews with external stakeholders representing relevant rightsholder groups such as indigenous peoples and workers, besides Vestas' senior management and internal subject matter experts.' Although the Company lists affected stakeholders consulted in the due diligence process, no information was found on how they are involved in the specific stage of risk assessment. [Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>]</li> </ul>
B.2.3	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> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes system to prevent, mitigate and remediate HRs issues: The Company describes approaches to prevent and mitigate risks in its downstream supply chain. As a wind turbine manufacturer, manufacturing (as well as construction/service) is the company's own operation. The Company has provided</li> </ul>

## B. Embedding respect and human rights due diligence

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			<p>feedback regarding this subindicator. It states that 'The assessment, which analysed different part of our operations, consisted of desktop research, an analysis of internal management processes, and interviews. The new assessment evolved to include interviews with external stakeholders who represent relevant rightsholder groups such as indigenous peoples and workers, in addition to our senior management and internal subject matter experts. The 2022 assessment has included our new development business function, in addition to the manufacturing, construction and service operations units assessed in 2018.' It then goes on to present 'Improvements made since 2018 HRA' and lists changes to the Human Rights Policy, Employee Code of Conduct, Supplier Code of Conduct, and Conflict Minerals Policy. [Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>] &amp; [Vestas Social Management System, 2022: <a href="https://vestas.com">vestas.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how global system applies to supply chain: The Company indicates that suppliers undergo 'pre-screening, self-assessment questionnaires, on-site and desktop evaluations, and ongoing performance monitoring.' It further elaborates that 'if non-conformities detected during assessment, supplier will be given an improvement plan, including follow up to monitor progress, or blocked.' However, no description was found of how the Company approaches prevention, mitigation and remediation of its salient human rights issues in its supply chain outside of auditing of individual suppliers. [Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>] &amp; [Supplier Sustainability webpage: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Met: Example of actions decided on at least 1 salient HRs issue: The Company states that to manage the risk of modern slavery in its own operations it 'has been running a pilot in Denmark to create a new and simplified hiring process in a recruitment system called SAP SuccessFactors. SAP SuccessFactors is a centralised platform used to screen and qualify all candidates. This will enable Vestas to minimise the use of recruitment agencies.' [2022 Modern Slavery Statement: <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how stakeholders involved in decisions about actions taken: The Company states that 'Furthermore, we will implement recommendations within community engagement and land rights within our new Development function to ensure a systematic approach to managing risks related to meaningful consultation and land rights in development.' However, while this is a good initiative, it is not clear if the Company has already followed through with this intention at the time this research was conducted. It further outlines community and stakeholder engagement in its Social Management System. However, it is not clear if this includes involving affected stakeholders in the decisions about action taken regarding the prevention, mitigation, and remediation of salient human rights risks. [Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>] &amp; [Vestas Social Management System, 2022: <a href="https://vestas.com">vestas.com</a>]</li> </ul>
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes system for evaluation effectiveness of actions: The Company states that 'As part of our commitment to respecting human rights, we track our progress on our salient human rights issues through different indicators to communicate internally and externally.' However, no clear information of the system to track the actions taken in relation to its salient human rights issues was found. The Company provided feedback regarding this subindicator. However, it was not considered sufficient to meet this criteria. This subindicator is looking for an overall system for tracking the effectiveness of actions taken on human rights issues, rather than individual cases. [Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Met: Example of lessons learned from evaluation effectiveness of actions: The Company states 'we have initiated a new HSE management system, which is simpler, clearer, and more systematic. [...] With this in place we will be able to address operational control through critical control checks, and an assurance methodology including the training of certified auditors.' [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involves stakeholders in evaluation effectiveness of actions</li> </ul>
B.2.5	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Provides two examples of comms with stakeholders: The Company provided feedback regarding this indicator. It states that 'the assessment has evolved to include interviews with external stakeholders representing relevant</li> </ul>

## B. Embedding respect and human rights due diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>rightsholder groups such as indigenous peoples and workers, besides Vestas' senior management and internal subject matter experts.' It further has engagement strategies for local communities. However, this subindicator is looking for specific examples where the Company engaged with stakeholders on specific human rights issues or impacts raised by them following a Due Diligence process. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>] &amp; [Vestas Social Management System, 2022: <a href="https://vestas.com">vestas.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <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	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism accessible to all workers: The Company has an Operational Grievance Mechanism (OGM) that is accessible for workers to raise concerns, complaints, or doubts. Furthermore, the Company has an EthicsLine available for reporting of code of conduct violations. [Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>] &amp; [Vestas Social Management System, 2022: <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism available in appropriate languages and workers made aware: The Company states that 'To raise further awareness of the EthicsLine and how to use it, several training sessions, communication initiatives, and webinars are conducted across Vestas. Our training material, which has been translated into several languages, is available on the Code of Conduct Portal and includes training slides with anonymised EthicsLine cases.' The EthicsLine site is available in multiple languages. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Met: Describes how workers in supply chain access grievance mechanism: The Company states that 'We expect our suppliers to have a reporting system in place to ensure that employees can voice concerns anonymously and without fear of retaliation.' [Supplier code of Conduct, 2021: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: Expects suppliers to convey expectation to their suppliers: The Company provided the following evidence to the BHRRC: 'Our suppliers are responsible for conducting due diligence to identify and manage potential risks related to human rights, the environment, and business ethics in their supply chain. This includes having appropriate policies, responsible supply chain management systems, and grievance mechanisms proportionate to the size of the supplier and the complexity and risk of the business environment.' However, it is not clear that the Company considers 'responsible supply chain management' to include cascading grievance mechanism expectations to suppliers' supplier.</li> </ul> <p>[Supplier code of Conduct, 2021: <a href="https://vestas.com">vestas.com</a>]</p>
C.2	Grievance mechanism(s) for external individuals and communities	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism accessible to all external individuals and communities: The Company indicates that is open to any individuals or groups. 'For this purpose, Vestas has in place an Operational-level Grievance Mechanism (OGM) used during the construction of our wind farm projects and EthicsLine, our whistleblower hotline which is publicly available and accessible'. [Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The Company provided the following evidence to the BHRRC: 'The OGM is available in English and in local languages'. It further states that 'The communication channels can vary depending on local customs and characteristics. The main channel is face to face, but Vestas also uses suggestion boxes, an email address, a toll-free telephone hotline, and regular meetings with affected communities'. [Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>] &amp; [Vestas Social Management System, 2022: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Met: Describes how external individuals/communities access grievance mechanism: The Company indicates that is open to any individuals or groups. It states 'Our OGM is open to all external stakeholders that may have a concern or complaint related to a project. Any complainant, be it a group or an individual, can raise a concern or a grievance related to human rights issues e.g., community health &amp; safety, cultural heritage &amp; customs, misalignment on benefits, security guards, and land compensation.' [...] 'For this purpose, Vestas has in place an</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Operational-level Grievance Mechanism (OGM) used during the construction of our wind farm projects and EthicsLine, our whistle-blower hotline which is publicly available and accessible'. The Company provided evidence to the BHRRC: 'If employees or business partners see or suspect behaviour that violates the Code, we depend on them to report it to EthicsLine, the Vestas whistleblower system. This will allow EthicsLine to investigate and address the issue. Even if they are not sure or do not have all of the evidence, we encourage them to share as much information as they have with EthicsLine. [Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>] &amp; [Supplier code of Conduct, 2021: <a href="https://vestas.com">vestas.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Expects supplier to convey expectation to their suppliers: The Company provided the following evidence to the BHRRC: 'Our suppliers are responsible for conducting due diligence to identify and manage potential risks related to human rights, the environment, and business ethics in their supply chain. This includes having appropriate policies, responsible supply chain management systems, and grievance mechanisms proportionate to the size of the supplier and the complexity and risk of the business environment.' However, it is not clear that the Company considers 'responsible supply chain management' to include cascading of the requirements regarding grievance mechanism. [Supplier code of Conduct, 2021: <a href="https://vestas.com">vestas.com</a>]</li> </ul>
C.7	Remedying adverse impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes approach taken to remedy adverse HRs impacts: The Company states that 'A recent example of remedy provision took place in one of our projects in Jordan in 2020. Local farmers experienced negative impacts in their livelihoods due to the dust emissions from heavy transportation. The dust covered livestock grazing areas and olive trees, resulting in reduced income. To address this issue, we hired an independent consultant that conducted a rigorous impact assessment and calculated a fair level of compensation. The complainants were compensated for their loss of income.' [Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: Describes how remedy would be provided if no adverse impact identified</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes changes to systems, processes and practices to prevent future impacts: The Company states that 'After this case, we implemented changes in the training of our transport suppliers to raise awareness about dust-related impacts on people and how we expect them to mitigate it through e.g., speed limits on site and covering trucks.' [Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: Describes approach to monitoring/implementing agreed remedy: The Company provided feedback regarding this indicator. However, it was not sufficient to meet the criteria for the assessment.</li> <li>• Not Met: Describes approach to learning from incidents if no adverse impacts identified</li> </ul>

### CSI. Responsible lobbying and political engagement fundamentals

Indicator Code	Indicator name	Score (out of 2)	Explanation
CSI.18	Responsible lobbying and political engagement fundamentals	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</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 that 'We seek to engage with governments and politicians to promote Vestas' interests in energy and renewables in a legal, ethical, and transparent manner. This process can involve direct advocacy with governments, information campaigns, or meetings with officials and politicians on issues linked to wind energy. Vestas is also a member of industry associations, some of which may support certain political parties or issues. Vestas does not use corporate funds for donations that support political parties or individual politicians. Any exemptions to this rule must be in accordance with local law and have prior written approval from the Vestas CEO.' [Vestas Employee Code of Conduct, 09/2021: <a href="https://vestas.com">vestas.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Publicly available policy statement that specifies the Company does not make political contributions: The Company indicates on its website that 'Vestas also does not use corporate funds for donations that support political parties or individual politicians'. However, methodology requires statements regarding this topic to be placed in formal policy documents. The Company further states in its Employee Code of Conduct that 'Vestas does not use corporate funds for donations that support political parties or individual politicians. Any exemptions to this rule must be in accordance with local law and have prior written approval from the Vestas CEO.' Thereby the Company does allow for political contributions in some circumstances. [Vestas Compliance webpage, N/A: <a href="https://vestas.com">vestas.com</a>] &amp; [Vestas Employee Code of Conduct, 09/2021: <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Meets all requirements under score 1</li> <li>• Met: Disclosure of expenditures on lobbying activities: The Company discloses in its 2022 Sustainability report that its political engagement spending was ~3.5EURm for membership fees of trade associations and ~1EURm for external assistance. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: Requirement for third-party lobbyists to comply with the Company's lobbying and political engagement policy (or policies): The Company states that 'We also use consultancies, law firms, and Danish Trade Council services to support in promoting Vestas' interests in markets with insufficient in-house resources. The Trade Council is part of the Ministry of Foreign Affairs and assists Danish and international companies with export and investment promotion services.' However, it is unclear what requirements regarding the lobbying activities is placed on these third-party lobbyists. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Expectation of project developer clients to have a public commitment to respect indigenous rights: The supplier code of conduct states 'Vestas commits to respect the rights and interests of local communities – including indigenous people – in relation to our operations and projects.' However, no statement could be found indicating an expectation for clients to have the same commitment. The Company further states in its human rights policy 'Vestas expects business partners to respect human rights within their scope'. In the Annex to the human rights policy it states that 'The Human Rights referred to in this Policy include: ILO Convention No.169 on Indigenous and Tribal Peoples and the United Nations Declaration on the Rights of Indigenous Peoples.' [Vestas Employee Code of Conduct, 09/2021: <a href="https://vestas.com">vestas.com</a>] &amp; [Vestas Human Rights Policy, 10/12/2019: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: Expectation for suppliers in contracts or supplier codes of conduct to have public commitment to respect indigenous rights: The supplier code of conduct states 'Vestas commits to respect the rights and interests of local communities – including indigenous people – in relation to our operations and projects.' As expectation for suppliers it includes 'Engage with and listen to local communities in an inclusive, equitable, culturally appropriate, and gender-sensitive way, particularly indigenous communities (where relevant)'. However, no statement was found on an expectation for suppliers to have a public commitment to respect Indigenous Peoples' rights. [Supplier code of Conduct, 2021: <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to only work with business partners that respect FPIC (in line with ILO No.169): The Company has developed a social due diligence tool for downstream due diligence. This is in line with the spirit of the criteria, however, information available in the public domain is not yet sufficient to meet the criteria as it would require evidence that the company does not proceed with projects that do not respect FPIC.</li> </ul>
D.2.M	Engagement with all affected communities	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes how local communities identified and engaged in the last two years: For manufacturers, this criteria is looking for a process to engage with communities on potential impacts related to the operational phase of the project the manufacturer is involved in (ie: impacts of the construction, operation/maintenance on communities for example). The Company indicates that it uses a 'social due diligence tool' to identify and assess social risks and potential adverse human rights impacts on affected communities. [...] The in-depth</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>assessment also aims to determine whether there is any known past or present community opposition to the project [...] The findings of the SDD inform the second phase where we prepare and implement project-level social management plans, tailored to the risks, while also seeking to maximise local community opportunities. We may decide to allocate an on-site social coordinator to implement social mitigation measures, which may include job creation and procurement of local sourcing specifically during the construction phase, educating affected communities about wind energy to dispel any myths, establishing a channel for affected communities to raise any concern or grievance, and/or community development initiatives aiming at improving the quality of life in the affected community. The frequency of our engagement with affected communities or their representatives varies from project to project.' The Company further states in its social management system that 'Initially, the project developer is responsible for establishing relations with the people affected by a wind park through public consultations, whereby project information is disclosed, and communities can voice concerns. Community engagement will continue throughout the project life. Vestas also plays an important role in maintaining a sound relationship with the people impacted by the project. Furthermore, a robust and effective operational grievance mechanism does not only establish avenues to air concerns or grievances but also involves regular interactions from the local communities through the social coordinator. This process ensures that the concern or grievances from community members are heard, responded to and managed through a defined process. [...]</p> <p>The project should identify and work on critical community development areas to uplift the communities socially and economically and improve their overall quality of life in aspects such as social infrastructure development support.' [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>] &amp; [Vestas Social Management System, 2022: <a href="https://vestas.com">vestas.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Provides two examples of engagement with communities: The Company states that 'The developer of the wind farm will, during public consultation, present potential risks and how the project intends to prevent or, where prevention is not possible, mitigate the impact. During these meetings the developer gains more insight into how the public perceives the project. In addition, the public is given an opportunity to raise any concerns or expectations towards the project.' The Company further presents engagement projects with communities in various locations. However, those are aimed at community development rather than how the Company's operations are impacting human rights of communities. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: Examples of engagement refer to marginalised groups and provide additional detail: The Company provided feedback regarding this indicator. However, the evidence did not present specific examples of engagement referring to marginalised groups. For manufacturers, this criteria is looking for an expectation that project developers have these elements in place in the consultations they undertake.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HRs issues: The final stage of the social diligence (SDD) encourages stakeholders views on HR issues. However, no summary analysis of these views was found. The Company provided feedback regarding this indicator. However, the evidence provided did not include a public summary analysis of stakeholder views. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: Describes how stakeholders views influenced company's overall HRs approach: The Company provided feedback regarding this indicator. However, the evidence was not sufficient to meet this criteria</li> </ul>
D.3.M	Benefit and ownership sharing policy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Rewards for clients that have a commitment to identify potential benefit and ownership sharing: The Company provided the following evidence to the BHRRC: 'Vestas coordinates community development activities with the Customer to synergise efforts and ideally resources too, and to maximise the outcomes and reach.' However, this subindicator is looking for rewards in the sense of incentives for clients to encourage adoption of co-ownership and benefit sharing practices. [Vestas Social Management System, 2022: <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Rewards for clients for disclosing statistics for each project (demographics of ownership sharing)</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.M	Local wind & solar energy access, affordability	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Actions taken to support access and affordability of renewable energy in the value chain: The company indicates that it contributed to development of policies and associated regulations that promote the role of wind power in clean energy transition. It also states that its performance targets cover ambitions to increase use of sustainable materials and recyclability. However, no clear disclosure of actions aimed at supporting the access and availability of renewables energy in the entire value chain was found. The Company indicates that it is contributing to UN Target 7.1 by 'being a pioneer and leader in wind energy solutions for several decades, we worked to make wind energy a competitive source of energy. [...] This achievement is supported by our global service business, improving our customers' business cases and enabling a stable supply of renewable electricity.' However, this indicator is looking for specific actions taken to support local access and affordability in the value chain. The Company further indicates that it 'In 2011, Vestas installed the first wind turbine in the Dominican Republic. In order to increase awareness on renewable energy, in 2019 Vestas partnered with the NGO "500 RPM" and the National Institute of Professional Technical Training (INFOTEP) to build a simple 350W DIY turbine. The turbine was installed next to a rural school as a backup solution to the constant power cuts. This initiative developed local knowledge through a theoretical and practical workshop so that the technical schools can replicate this type of turbine in the future.' And that 'In 2018, Vestas constructed the 100 MW turnkey Corti wind farm near Bahía Blanca in Argentina. In order to increase awareness on renewable energy and to actually develop renewable energy at educational institutions, Vestas and our customer partnered with a local NGO to build small 350W wind turbines based on a DIY concept. Nine Vestas employees assisted hands-on in the project. The students were trained by the NGO on how to build the small turbines so that in the future they can build more turbines for the rural communities in the area.' [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>] &amp; [Vestas CSR webpage, N/A: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: Including a timebound action plan and reporting targets on supporting energy access and affordability in consultation with communities: The Company indicates that it is contributing to the UN target to ensure universal access to affordable, reliable and modern energy services by 'being a pioneer and leader in wind energy solutions for several decades'. However, no specific actions plans and reporting targets were found including a timebound action plan and reporting targets on supporting energy access and affordability in consultation with communities. The Company provided feedback regarding this indicator. However, key evidence was already in use. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Public support for government policies addressing energy access: The Company provided feedback regarding this subindicator. It states that 'contributed to the development of policies and associated regulations that promote the role of wind power in the clean energy transition, thereby creating and shaping new markets across the globe [...]' It also lists the Scaling up of grid infrastructure and flexible solutions on supply and demand side as policy focus areas. Furthermore, it indicates that 'As the aspiring world leader in sustainable energy solutions, Vestas is working to accelerate the renewable industry's human rights performance through fostering partnerships. If the energy transition is to be truly responsible and inclusive, we need to adopt a cross-stakeholder, collaborative approach to respecting business-related human rights. Human rights are transitioning from soft law to hard law and financial institutions are firming up their demands. Vestas and its partners will have to approach these changes together. [...] in 2023 we contributed with a case study on our full value chain approach to due diligence to a new publication on Due Diligence in the Downstream Value Chain by the Danish Institute of Human Rights. We also form part of many different networks e.g., the Nordic Business Network for Human Rights, the local UN Global Compact network on Human Rights, are a part of BSR's Collaborative Initiative Energy for a Just Transition and the Dutch International Responsible Business Conduct Agreement for the Renewable Energy Sector.' [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>] &amp; [Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>]</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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <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 provided feedback for this indicator. It states in its Employee code of conduct that 'when local laws and regulations set lower standards but also do not prohibit applying international standards that exceed local laws and regulations, we apply international standards.' And in its Supplier Code of Conduct makes a similar statement. It further states that the international standards include the OECD Guidelines for Multinational Enterprises which in themselves reference the VGGTs. However this subindicator is looking for expectations for clients. Furthermore, this indicator is looking for an explicit and direct expectation. [Supplier code of Conduct, 2021: <a href="https://vestas.com">vestas.com</a>] &amp; [Vestas Employee Code of Conduct, 09/2021: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: Expectation for suppliers to have commitment to respect land ownership/natural resources as in VGGT: See above.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Steps taken to use leverage to resolve land rights issues or disclosure that no such issues arose</li> </ul>
E.2.M	Just and fair physical and economic displacement policy implementation including free, prior and informed consent	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <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 that it is conducting the Social Due Diligence in accordance with the IFC Performance Standards. However, no statement was found indicating an expectation to the Company's clients to have this commitment. The Company provided feedback regarding this subindicator. It states in its Employee Code of Conduct that 'When local laws and regulations set lower standards but do not prohibit applying international standards that exceed local laws and regulations, we apply international standards.' However, no expectation for clients was found. [Vestas Social Management System, 2022: <a href="https://vestas.com">vestas.com</a>] &amp; [Supplier code of Conduct, 2021: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: Expectations for suppliers to commit to IFC PS 5 for physical and economic displacements: The Company indicates being guided by the IFC PS in their Social Due Diligence. However, no statement was found indicating an expectation to the Company's suppliers to have this commitment. The Company further states in its Supplier Code of Conduct under the heading for Community Engagement that 'Vestas commits to respect the rights and interests of local communities [...] When indigenous people are potentially affected by our activities, we are guided by relevant international standards, such as the International Finance Corporation (IFC) Performance Standards.' However, no clear expectation for suppliers to commit to the IFC PS 5 was found. [Vestas Social Management System, 2022: <a href="https://vestas.com">vestas.com</a>] &amp; [Supplier code of Conduct, 2021: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: Expectation for suppliers to have a commitment not to relocate without FPIC and to providing compensation: The Company provided comments regarding this sub indicator. However, for manufacturing companies this sub indicator is looking for an expectation towards suppliers to have this commitment.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Expectation for clients to disclose statistics on relocations (current and planned projects): The Company has developed a social due diligence tool that is taking a considerable step towards the requirements outlined in this sub indicator. However, the information available in the public domain is not yet sufficient to meet the criteria.</li> <li>• Not Met: Expectation for suppliers to publish statistics on relocations (current and planned projects): The Company has developed a social due diligence tool that is taking a considerable step towards the requirements outlined in this sub indicator. However, the information available in the public domain is not yet sufficient to meet the criteria.</li> <li>• Not Met: Expectation for clients to disclose reviews of living conditions of relocated communities: The Company has developed a social due diligence tool that is taking a considerable step towards the requirements outlined in this sub indicator. However, the information available in the public domain is not yet sufficient to meet the criteria.</li> <li>• Not Met: Expectation for suppliers to publish reviews of living conditions of relocated communities: The Company has developed a social due diligence tool that is taking a considerable step towards the requirements outlined in this subindicator. However, the information available in the public domain is not yet sufficient to meet the criteria.</li> </ul>

## E. Land and resource rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes approach in relation to relocation: The Company has developed a social due diligence tool that is taking a considerable step towards the requirements outlined in this subindicator. However, the information available in the public domain is not yet sufficient to meet the criteria.</li> </ul>

## F. Security and conflict-affected areas (incl. responsible mineral sourcing)

Indicator Code	Indicator name	Score (out of 2)	Explanation
F.1.M	Operating in or sourcing from conflict-affected areas	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commitment to heightened HRDD in conflict affected areas: The Company states that 'Vestas conducts its own due diligence on conflict minerals, following the OECD Due Diligence Guidance for Responsible Supply Chains of Mineral to ensure we are not linked to human rights harms. Due diligence entails verifying that minerals and metals used in our suppliers' products, such as tin, tantalum, tungsten, and gold, are not sourced from conflict affects or high risk areas'. However, no evidence found of commitment to heightened due diligence on human rights in conflict affected and high risk areas beyond the specific context of conflict minerals, which already have their own specific indicators. The Company further states that 'Some of the new focus areas identified for business action by our 2022 assessment are high-risk and conflict-affected areas [...] In the coming years, we will prioritise working across the organisation to strengthen our processes on these issues.' [Conflict Minerals Policy, 2022: <a href="https://vestas.com">vestas.com</a>] &amp; [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: Steps taken to assess and mitigate these risks with conflict sensitive lens: The Company states that 'Due diligence entails verifying that minerals and metals used in our suppliers' products, such as tin, tantalum, tungsten, and gold, are not sourced from conflict-affected or high-risk areas. As part of this process, we rely on our suppliers to provide information on the origin and sources of the minerals and metals they use'. However, no evidence found beyond the context of conflict minerals, which already have their own specific indicators. The Company provided feedback regarding this subindicator. It states in its sustainability report, that 'We conduct additional assessments on suppliers who may be at risk of procuring conflict minerals. [...] However, this subindicator is looking for conflict sensitive lens being applied to a beyond the specific area of conflict minerals. [Supplier code of Conduct, 2021: <a href="https://vestas.com">vestas.com</a>] &amp; [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How stakeholders are involved in the process to mitigate risks: The Company provided feedback regarding this subindicator. However, this subindicator is looking for evidence of how affected stakeholders are involved in the process to mitigate this particular risk. No suitable evidence for this was found.</li> </ul>
F.2.M	Evidence of security provider human rights assessments	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Expectations for clients to regularly conduct risk assessments regarding security forces</li> <li>• Not Met: Expectations for suppliers to regularly conduct risk assessments regarding security forces: The Company states an expectation on suppliers to implement 'security plans'. However, it is not specified whether these need to include risk assessments or the frequency of them taking place. [Supplier code of Conduct, 2021: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: Regularly conducts risk assessment regarding security forces</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Expectation for clients to have commitment to Voluntary Principles on Security and HRs</li> <li>• Not Met: Expectation for suppliers to have commitment to Voluntary Principles on Security and HRs: The Company states that it operates 'in line with international standards, such as The International Code of Conduct for Private Security Providers and the Voluntary Principles on Security and Human Rights. However, no clear statement of expectation for suppliers to have these commitments could be found. [Supplier code of Conduct, 2021: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: If applicable, discloses use of private security providers and uses only ICoCA members.</li> </ul> <p>If direct employment of security, commitment to follow ICoCA itself.</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
F.3.M	Responsible sourcing of minerals: Arrangements with suppliers	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Statement on OECD Guidance aligned due diligence and requirement in contracts/codes with suppliers: The Company states that 'Vestas conducts its own due diligence on conflict minerals, following the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals to ensure we are not linked to human rights harms'. [Supplier code of Conduct, 2021: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: Describes work with suppliers on risk assessment and improving DD: The Company indicates 'Due diligence entails verifying that minerals and metals used in our suppliers' products, such as tin, tantalum, tungsten, and gold, are not sourced from conflict-affected or high-risk areas. As part of this process, we rely on our suppliers to provide information on the origin and sources of the minerals and metals they use.' However, no information was found on how the Company is working with suppliers on this issue. The Company provided feedback regarding this subindicator. It states that 'In autumn 2022, three webinars were organised with a total of 294 participants. The aim was to give an understanding of our overall Sustainability Strategy and communicate our expectations of suppliers. A specific webinar covered the social aspects of The Supplier Code.' However, this indicator is looking for evidence of a systemic approach to working on the specific issue. [Supplier code of Conduct, 2021: <a href="https://vestas.com">vestas.com</a>] &amp; [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Disclosure of supply chain mapping</li> </ul>
F.4.M	Responsible sourcing of minerals: Risk identification in mineral supply chains	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes risk identification and disclosure in line with OECD Guidance: The Company indicates it is conducting additional assessments on the suppliers it perceives to be at risk of procuring conflict minerals. It states that this is done following the OECD Guidance for responsible Supply Chains of Minerals. 'Due Diligence entails verifying that minerals and metals used in our suppliers products [...] are not sourced from conflict-affected or high-risk areas.' However, the Company does not disclose the risks identified. The Company has a general disclosure of the risks it identified through its Human Rights Assessment process, however, no risks related to conflict minerals are disclosed. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Met: Describes process to identify smelters/refiners and assessment of whether these carried out due diligence in accordance with OECD Guidance: The Company states that it uses the 'internationally recognised Conflict Minerals Reporting Template [...] for supplier reporting of smelters being utilised.' If high risk smelters remain in the supply chain of products, parts or materials, the supplier has to provide written documentation of due diligence process to address this. [Conflict Minerals Policy, 2022: <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses smelters/refiners assessed in line with OECD Guidance</li> <li>• Not Met: Risk identification process covers all minerals: In the sustainability report it suggests its risk identification process for minerals it states: 'We conduct additional assessments on suppliers who maybe at risk of procuring conflict minerals. In 2022, we completed our second conflict minerals programme and surveyed 500 suppliers using a third party supply chain data management solution'. However, the Company is currently in the process of mapping REE, despite at the moment not disclosing the use of all of these. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> </ul>
F.5.M	Responsible sourcing of minerals: Risk management in the mineral supply chain	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Steps taken to respond to risks in mineral supply chain: The Company indicates that 'subsequent action towards suppliers is based on the risk-level of the reported smelters, and includes a follow up with suppliers that have reported potential risks. Vestas has the following expectations from its suppliers: Make available upon request CMRT on a product level, or a company level, if the initial one is not obtainable; If any high-risk smelters are reported in the CMRT, identify if your vendors, who have listed these smelter sources, contribute to the products, parts or materials sold by you to Vestas; After conducting due diligence, if any of the high-risk smelters remain in the supply chain of products, parts or materials sold by you to Vestas, you, as supplier to Vestas, must provide written documentation of your due diligence process to address this.' [Conflict Minerals Policy, 2022: <a href="https://vestas.com">vestas.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Description of process to monitor performance of risk mitigation measures: The Company indicates that it does follow ups with suppliers. It states that 'in 2022, we completed our second Conflict Minerals Programme and surveyed 500 suppliers using a third-party supply chain data management solution. Supplier responses were submitted by using the Conflict Minerals Reporting Template. The survey results showed that suppliers who participated in both the 2021 and 2022 programmes improved their assessment score by transitioning to lower risk smelters. The overall supplier response rate also increased from 81 percent in 2021 to 89 percent in 2022. The aim of our Conflict Minerals Programme is to increase the transparency of our own sourcing, educate our supply chain on avoiding the procurement of conflict minerals, and encourage suppliers to establish their own responsible sourcing programmes.' [Conflict Minerals Policy, 2022: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Met: Disclosure of significant improvements over time: The Company discloses that 'The survey results showed that suppliers who participated in both 2021 and 2022 programmes improved their assessment score by transitioning from high to lower risk smelters.' [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How suppliers and affected stakeholders engaged on strategy: The Company indicates that 'in autumn 2022, three webinars were organised with a total of 294 participants. The aim was to give an understanding of our overall Sustainability Strategy and communicate our expectations of suppliers. A specific webinar covered the social aspects of The Supplier Code.' It further states that At Vestas, fostering dialogue and engagement is integral to our supplier relationships, whether they are direct or indirect suppliers. We believe in actively addressing any non-conformities identified during supplier assessments and mitigating their negative impact. Each non-conformity is followed up with a corrective action plan aimed at improving supplier practices. Our collaborative approach involves regular communication, monitoring progress, and offering assistance to facilitate their improvement journey. By working together, we strive to establish a sustainable supply chain that upholds the highest standards of social and environmental responsibility, ensuring a positive and responsible impact on our stakeholders and the planet.' However, no evidence was found of the engagement with affected stakeholders. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>] &amp; [Vestas Supplier Sustainability (web): <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: Processes cover all minerals: The Company indicates that 'in 2022 we initiated a detailed mapping of our rare earth mineral use in specific wind turbine platforms. We expect to finalise the analysis in 2023 and use the results to further develop our risk frameworks and management of these materials.' However, the Company's work on this is still ongoing at the time this research is conducted. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> </ul>

## G. Protection of human rights and environmental defenders

Indicator Code	Indicator name	Score (out of 2)	Explanation
G.1.M	Commitment to respect the rights of human rights and environmental defenders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Zero tolerance of threats/attacks on HRDs: The Company states that 'We do not tolerate threats, intimidation, physical or legal attacks against human rights defenders in relation to our business or operations'. [Human rights webpage, N/A: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: Expectation on business partners in value chain to make this commitment: The Company states in its Supplier Code of Conduct: 'Our suppliers must comply with this Supplier Code' The Code contains expectations on certain human rights. However, no specific expectation relating to human rights defenders was found. [Supplier code of Conduct, 2021: <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Description of how working with HRDs to create safe and enabling environment</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
H.1.M	Health and safety	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</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: The Company discloses that in 2022 its fatality rate for both direct and contract employees was zero. It also discloses the Total Recordable Incident rate which includes fatalities, lost time incidents, restricted work injuries and medical treatment injuries which for 2022 was 3.3 per million working hours.</li> <li>• Not Met: Expects disclosure of H&amp;S information of relevant business relationships</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Sets targets for H&amp;S performance (including injury rates or lost days and fatalities): The Company states that 'We want to become the safest company in the energy industry, so we are committed to reducing our Total Recordable Injury Rate (TRIR) to 1.5 by 2025, and to 0,6 by 2030.' It further states as one of its key sustainability initiatives' [...] avoid all fatalities'. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Met: Met targets or explains why not or how improve H&amp;S management systems: The Company indicates that 'To reach our ambitious target [...] we have initiated a new HSE management system, which is simpler, clearer, and more systematic. The system takes a risk-based approach, in line with the new ISO 45001 standards.' [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> </ul>
H.2.M	Forced labour risk management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</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: The Company includes forced labour in its Supplier Code of Conduct, however, no specific board oversight for this issues was found. Furthermore, no information was found on how relevant stakeholders inform board decisions. The Company has provided feedback to the BHRRC outlining its sustainability governance structure. However, no evidence was found of board level oversight over the specific issue of forced labour in the Company's supply chain. [Supplier code of Conduct, 2021: <a href="https://vestas.com">vestas.com</a>] &amp; [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: Suppliers to have these arrangements in place: The Company has provided the following evidence to the BHRRC: 'We expect our suppliers to have adequate management systems in place to ensure compliance with this Supplier Code.' The supplier code of conduct includes forced labour provisions. However, this subindicator is looking for arrangements at board level of the suppliers. [Supplier code of Conduct, 2021: <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses ongoing efforts to prevent and mitigate forced labour in own ops and supply chain: The Company has provided the following evidence to the BHRRC: 'In autumn 2022, three webinars were organised with a total of 294 participants. The aim was to give an understanding of our overall Sustainability Strategy and communicate our expectations of suppliers. A specific webinar covered the social aspects of The Supplier Code.' It further states that 'At Vestas, fostering dialogue and engagement is integral to our supplier relationships, whether they are direct or indirect suppliers. We believe in actively addressing any non-conformities identified during supplier assessments and mitigating their negative impact. Each non-conformity is followed up with a corrective action plan aimed at improving supplier practices. Our collaborative approach involves regular communication, monitoring progress, and offering assistance to facilitate their improvement journey. By working together, we strive to establish a sustainable supply chain that upholds the highest standards of social and environmental responsibility, ensuring a positive and responsible impact on our stakeholders and the planet.' However, this subindicator is looking for specific efforts on the topic of prevention and mitigation of forced labour. [Supplier Sustainability webpage: <a href="https://vestas.com">vestas.com</a>] &amp; [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Met: Factors to be considered when ending a business relationship: The Company provided the following evidence to the BHRRC: 'At Vestas suppliers are required to comply with our Supplier Code of Conduct. The Supplier Code is an integrated part of our purchase agreements, and if a supplier is not following the Code, we will take necessary actions to mitigate risks and resolve any issues. In some cases, this includes triggering the Supplier Blocking Process to terminate our relationship with the supplier).' [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> </ul>
H.3.M	Prohibition of forced labour: Wage practices	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on paying directly, in full and on time in supplier codes and contracts: The Company states in the Supplier Code of Conduct that suppliers should 'Do Not Withhold Wages [...] Do Not Charge Recruitment Fees or Require Deposits [...] Provide with a Wage Statement that specifies Hours'. However, a requirement to provide wage statements is not equivalent to requiring suppliers to pay wages in full. Similarly, a prohibition of recruitment fees or deposits is not equivalent to requiring suppliers to pay workers in full. [Supplier code of Conduct, 2021: <a href="https://vestas.com">vestas.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on paying workers regularly, in full and on time: The Company has provided the following evidence to the BHRRC: 'In autumn 2022, three webinars were organised with a total of 294 participants. The aim was to give an understanding of our overall Sustainability Strategy and communicate our expectations of suppliers. A specific webinar covered the social aspects of The Supplier Code.' It further states that 'At Vestas, fostering dialogue and engagement is integral to our supplier relationships, whether they are direct or indirect suppliers. We believe in actively addressing any non-conformities identified during supplier assessments and mitigating their negative impact. Each non-conformity is followed up with a corrective action plan aimed at improving supplier practices. Our collaborative approach involves regular communication, monitoring progress, and offering assistance to facilitate their improvement journey. By working together, we strive to establish a sustainable supply chain that upholds the highest standards of social and environmental responsibility, ensuring a positive and responsible impact on our stakeholders and the planet.' However, this subindicator is looking for specific efforts on the topic of prevention and mitigation of forced labour. [Supplier Sustainability webpage: <a href="https://vestas.com">vestas.com</a>] &amp; [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Description of implementation and monitoring of this practice</li> <li>• Not Met: Assessment scope of failure to pay workers directly in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
H.4.M	Prohibition of forced labour: Restrictions on workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Requirements on free movement in supplier codes and contracts: The Company states that supplier are required to 'Ensure all employees have freedom of movement during the course of their employment and the right to terminate their contract at all times [...] Do not withhold [...] identity cards, travel documents or other important documents'. [Supplier code of Conduct, 2021: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: Describes working with suppliers on free movement of workers: The Company has provided the following evidence to the BHRRC: 'In autumn 2022, three webinars were organised with a total of 294 participants. The aim was to give an understanding of our overall Sustainability Strategy and communicate our expectations of suppliers. A specific webinar covered the social aspects of The Supplier Code.' It further states that 'At Vestas, fostering dialogue and engagement is integral to our supplier relationships, whether they are direct or indirect suppliers. We believe in actively addressing any non-conformities identified during supplier assessments and mitigating their negative impact. Each non-conformity is followed up with a corrective action plan aimed at improving supplier practices. Our collaborative approach involves regular communication, monitoring progress, and offering assistance to facilitate their improvement journey. By working together, we strive to establish a sustainable supply chain that upholds the highest standards of social and environmental responsibility, ensuring a positive and responsible impact on our stakeholders and the planet.' However, this subindicator is looking for specific efforts on the topic of prevention and mitigation of forced labour. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>] &amp; [Supplier Sustainability webpage: <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Description of implementation and monitoring of this practice</li> </ul>
H.5.M	Freedom of association and collective bargaining	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commitment on FoA/CB and requirements in suppliers codes and contracts: The Company's Freedom of association policy states that 'Vestas commits to respecting employees' rights to freedom of association and collective bargaining without interference and free from discrimination [...] Vestas will promote these rights in relation with business partners- it states 'as described in Vestas Code of Conduct, and will seek to prevent or mitigate any adverse impacts on this right by business partners, which are directly linked to Vestas' operations, products or services'. In its supplier code of conduct it indicates that suppliers are required to 'respect the right of all employees to form and join (or not join) a trade union, freely elect their representatives, and bargain collectively.' It further indicates that 'employees should not fear intimidation or retaliation (including discrimination) for forming or joining a trade union or participating in collective bargaining'. [Vestas Freedom of Association Policy, 10/02/2014: <a href="https://vestas.com">vestas.com</a>] &amp; [Supplier code of Conduct, 2021: <a href="https://vestas.com">vestas.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on FoA/CB: The Company has provided the following evidence to the BHRRC: 'In autumn 2022, three webinars were organised with a total of 294 participants. The aim was to give an understanding of our overall Sustainability Strategy and communicate our expectations of suppliers. A specific webinar covered the social aspects of The Supplier Code.' It further states that 'At Vestas, fostering dialogue and engagement is integral to our supplier relationships, whether they are direct or indirect suppliers. We believe in actively addressing any non-conformities identified during supplier assessments and mitigating their negative impact. Each non-conformity is followed up with a corrective action plan aimed at improving supplier practices. Our collaborative approach involves regular communication, monitoring progress, and offering assistance to facilitate their improvement journey. By working together, we strive to establish a sustainable supply chain that upholds the highest standards of social and environmental responsibility, ensuring a positive and responsible impact on our stakeholders and the planet.' However, no evidence found on working with suppliers in relation to FAO. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>] &amp; [Supplier Sustainability webpage: <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of restriction of FoA/CB in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
H.6.M	Living wage (in supply chains)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on living wage in supplier codes and contracts: The Company states that suppliers should "Pay wages that, as a minimum, meet relevant national statutory minimum wages. Where there is no statutory minimum, you must meet trade or industry standards or collective bargaining agreements in the country of operation". However, no clear statement requiring suppliers to pay workers a living wage was found. [Supplier code of Conduct, 2021: <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on living wage</li> <li>• Not Met: The company provides evidence that its suppliers pay a living wage</li> <li>• Not Met: Requirement for suppliers to regularly review definition of living wages with relevant trade unions</li> </ul>

## I. Right to a healthy and clean environment

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.1.M	Environmental impact assessment and remediation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to only supply projects that conduct public EIA and CIA: The Company states that 'We ensure that an Environmental Impact Assessment ("EIA") in accordance with Directive 2011/92/EU of the European Parliament and of the Council including an assessment of the impact on water in accordance with the Directive 2000/60/EC, or equivalent, has been carried out for all manufacturing facilities.' However, no statement has been found indicating that this also applies for projects it supplies. The Company has provided feedback to the BHRRC regarding this indicator. However, it was not sufficient to fully meet this criteria. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to only supply projects that guarantee compensation for environment and people affected: The Company states that it ensures that the required compensation measures are implemented where necessary in accordance with Directive 2011/92/EU., that require compensation measures are implemented. However, it is unclear if this applies to countries outside the EU. The Company has provided feedback regarding this subindicator. However, it was not sufficient to meet the criteria for the assessment. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> </ul>
I.2.M	Life cycle assessment	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Conducts regular public life cycle assessments (including risks related to raw material sourcing, waste, and decommissioning): The Company states that 'At Vestas we perform life cycle assessments (LCAs) of all our products, which evaluates the complete value-chain performance from raw material manufacture, through to operation, transport and end-of-life.' The Life Cycle Assessment scope includes raw materials and resources, waste transport (recycling and landfill/incineration). The Company provided feedback regarding this subindicator. However, the requirement was already met. [Life Cycle Assessment webpage, N/A: <a href="https://vestas.com">vestas.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Action plans to address adverse impacts identified: The Company indicates that 'Today, Vestas wind turbines are on average 85 percent recyclable. However, our wind turbine rotors (i.e. blades and hub) consist of a relatively large amount of non-recyclable composite materials.</li> </ul> <p>Therefore, we will as a first step focus on improving the recyclability of all turbine rotors. We have introduced incremental targets to increase the recyclability rate of these components from 42 percent to 50 percent by 2025, and to 100 percent by 2030. We are implementing several initiatives designed to address the handling of existing blades after decommissioning, such as exploring new recycling technologies, working with material value chains as well as developing decommissioning guidelines for the wind turbine operators. Committing to zero-waste turbines means we are aiming to create a value chain that generates no waste materials. Therefore – in October 2021 we launched our Circularity Roadmap. The roadmap outlines circularity pathways for Vestas' entire value chain by setting new targets across three key areas: design, operations and material recovery.' [Our sustainability strategy: <a href="https://vestas.com">vestas.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Reports on progress made on action plan (including recycling/end-of-life): The Company reports on this in its 2022 Sustainability report. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> </ul>

## J. Transparency and anti-corruption

Indicator Code	Indicator name	Score (out of 2)	Explanation
J.1.M	Anti-corruption due diligence and reporting	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commitment to prohibiting bribes to public officials: The Company states in its Employee Code of Conduct that 'Bribes are money, gifts, or anything of value offered to influence someone in order to get an unfair advantage, either for personal or professional gain. Bribes are illegal and can result in significant fines, reputational damage, and even imprisonment. In addition, bribes can significantly weaken the trust of our customers and suppliers, while also undermining fair competition. [...] Vestas prohibits our employees, suppliers, and anyone acting on our behalf from giving or accepting bribes or making facilitation payments. Employees should be extra cautious when dealing with public officials, particularly when it comes to contracts, permits, and other decisions that affect Vestas' ability to operate. [Vestas Employee Code of Conduct, 09/2021: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Met: Expectation extends to relevant business relationships: See above. [Vestas Employee Code of Conduct, 09/2021: <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Reports on any complaints on corruption and bribery</li> <li>• Not Met: Reports that no such complaints were made</li> </ul>
J.2.M	Payments to governments & contract transparency	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Publishing a tax CbCR in line with GRI 207-4, or expecting project developers clients to disclose payments to governments at project level (including on land and natural resources): No information on its expectations towards project clients regarding publication of payments-to governments data has been identified in the company's reports and policies available on its website. The Company provides some information on its tax contributions in its 2022 sustainability report - however it does not follow the required reporting requirements under GRI 207-4 as it is limited to information on corporate income taxes, indirect taxes and employee taxes per region. In future assessments, the Company will be expected to demonstrate it publishes a tax CbCR and expects project developers clients to report on their payments to governments at project level, including for purchase or rent of land or natural resources related to its renewable energy projects. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: Disclosure of terms, contracts, agreements for those payments</li> <li>• Not Met: Expectation for business relationships to disclose this information</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Supports governments to disclose contracts and licenses on renewable energy project in line with EITI</li> </ul>

## K. Diversity, equality and inclusion

Indicator Code	Indicator name	Score (out of 2)	Explanation
K.1.M	Diversity, equality & inclusion training for management and employees	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Provides mandatory and regular training as per ILO No 190: The Company indicates that it provides Inclusive Leadership Training for People Managers and that it aims to roll out such training for all employees 'at some point in the future'. However, no evidence was found that mandatory and regular training is being carried out. The Company provided the following evidence to BHRRC 'To proactively ensure an inclusive and fair workplace, we launched an Anti-harassment and Anti-discrimination e-learning campaign in late 2021. As of May 2022, 19,145 employees (66% of our total workforce) have completed this e-learning training. It is our goal to ensure that 100% of our employees take this e-learning training over the coming years.' However, it is not clear from this statement if the training is mandatory and whether it will be held regularly. [Vestas Diversity, Equity, Inclusion and Belonging Policy: <a href="https://vestas.com">vestas.com</a>] &amp; [Diversity and Inclusion (web): <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Requires suppliers to do the same: The Company states that 'We believe diversity and inclusion are critical to our success, and we are committed to protecting the right of equal treatment and opportunities. We also encourage all of our suppliers to adapt similar diversity and inclusion initiatives.' However, not clear requirement for suppliers to provide training was found. [Supplier code of Conduct, 2021: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Not Met: Provides materials and access to resources for trainings</li> </ul>
K.2.M	Gender balance and sensitivity	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Timebound action plan to integrate gender lens to all relevant documents including on value chain: The Company has provided feedback for this subindicator, outlining its ambitions on female representation in leadership positions. However, the subindicator is looking for an action plan to integrate a gender lens (gender sensitive view) to the Company's policies and practices. [2022 Annual Report, 2022: <a href="https://mb.cision.com">mb.cision.com</a>] &amp; [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Met: Demonstrates progress through annual reporting: The Vestas' Executive Management Team receives annual reports on Vestas' DEIB status and Vestas will report on progress against target setting in accordance with ref. section 99b of the Financial Statements Act. [Vestas Diversity, Equity, Inclusion and Belonging Policy: <a href="https://vestas.com">vestas.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Women and non-binary people make up at least 40% of the Company's board of directors and executives, or executive board: In 2022, Vestas reached equal gender distribution among the members elected by the shareholders (according to the Danish Business Authorities' definition). However, it is unclear if this applies to the executive level. [Board of Directors webpage, N/A: <a href="https://vestas.com">vestas.com</a>]</li> </ul>
K.3.M	Gender wage gap reporting	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Has closed gender wage gap</li> <li>• Not Met: Timebound commitment to close gender wage gap</li> <li>• Not Met: Reports information at company level across multiple pay bands</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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	2	<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.: The Company states that 'Every day, our 29,000 employees help to create a better world by designing, manufacturing, installing, developing, and servicing wind energy and hybrid projects', [This is Vestas: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Met: Demonstrates measures taken to create and support access to green and decent jobs for affected stakeholders.: The Company mentions the need to create green jobs 'due to the need to accelerate the energy transition and create new, long-term green jobs, key markets such as the USA and Australia are moving towards bigger onshore projects of 1 GW or more'. The Company further states that 'as part of the keep it local initiative, a training programme on wind farm operation and maintenance was provided free of charge to residents of Caircará do</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>rio do Vento in collaboration with EDPR and CTGAS-ER of SENAI-RN. Our employees shared knowledge in several lectures over the three months duration of the course.' [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Demonstrates measures taken to ensure green and decent jobs promoting equality of opportunity for women and vulnerable groups: The Company collaborates with Women in wind, stating 'Currently, only one-fifth of the global wind energy workforce identify as women, and two-thirds of them perceive gender-related barriers in the industry (IRENA and Women in Wind 2020). Women in Wind is a leadership program which promotes diversity across the wind energy industry and accelerates the careers of women in wind power; it is managed by the Global Wind Energy Council and the Global Women's Network for the Energy Transition. Vestas is proud to support the Global Ambassadors for Women in Wind, championing diversity, inclusivity and sustainability around the world' [Diversity and Inclusion (web): <a href="https://vestas.com">vestas.com</a>]</li> </ul>
JT.4.M	Fundamentals of retaining and re-and/or up-skilling workers for an inclusive and balanced workforce	1	<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.: The Company provided feedback regrading this indicator. However, no evidence was found of the Company provided re- or upskilling specifically for workers affected 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.: The Company provides training programs for its own workforce. It further has initiatives to upskill affected stakeholders. However, it is unclear how it identifies skill gaps in affected stakeholders. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Met: Demonstrates measures taken to provide re-and/or upskilling, training or education opportunities for relevant stakeholders.: The sustainability report states 'Our community engagement initiatives can range from providing access to jobs and stimulating local procurement, to training, educational activities, and public infrastructure funding'. However, no specific details found in relation to provision re/upskilling training or education opportunities for workers linked to a just transition. The Company further states that 'as part of the keep it local initiative, a training programme on wind farm operation and maintenance was provided free of charge to residents of Caircara do rio do Vento in collaboration with EDPR and CTGAS-ER of SENAI-RN. Our employees shared knowledge in several lectures over the three months duration of the course.' [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> <li>• 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. : The report also indicates that 'We engaged with local skills training centers for women to conduct a hydroponic farming and food processing training programme that benefitted 45 women in 4 communities near our project. Through the training, the beneficiaries learned farming methods for domestic use that can enhance their income either through domestic consumption, or by starting their own business'. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> </ul>
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	2	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Discloses process(es) for aligning its lobbying activities with policies and regulation supporting the just transition.: The Company discloses all policies it is supporting through the trade associations it is a member of its Sustainability Report 2022. Thereby, it is ensuring that they are aligned with the just transition. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> <li>• Met: Discloses where its lobbying activities do not align with policies and regulation that support the just transition.: See above.</li> <li>• Met: Discloses action plan addressing misalignment of lobbying activities with policies and regulation that support just transition.: See above.</li> <li>• Met: Demonstrates lobbying for just transition and regulations enabling green and decent jobs, reskilling and/or social protection: The Company states that 'Vestas [...] participates in energy debates at international, national, regional, and local levels. We seek to engage with governments and public stakeholders to promote our interest in energy and renewables [...]' Our objective is to accelerate the clean energy transition [...]' It further lists policies it is supporting. [2022 Sustainability Report, 2022: <a href="https://vestas.com">vestas.com</a>]</li> </ul>

## M. Responses to Serious Allegations (20% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(1).0	Serious allegation No 1		No allegations meeting the REB threshold 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<sup>†</sup> are not included for this year's Benchmark. As such this scorecard should be seen as a reflection of feedback received as of September 2023<sup>‡</sup>.

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 2023 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 electric utilities 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.

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<sup>†</sup> Cut-off dates: 30 June 2023 for companies that did not engage with the benchmark; the expiration of the feedback period (between Aug/Sep 2023) for companies that engaged with the benchmark.

<sup>‡</sup> Further outreach and engagement with a subset of companies on the specific issue of exposure to forced labour risks was conducted in October 2023.