

# **UK Modern Slavery Act Statement 2025**

**ENERCON Wind Energy UK Limited**

## **1. Introduction**

The following statement is made by ENERCON Wind Energy UK Limited (“ENERCON UK”) pursuant to section 54 of the UK Modern Slavery Act 2015. This statement covers the financial year ending December 31<sup>st</sup>, 2025, and describes the steps the company has taken to deal with modern slavery risks in its business activities and its supply chain.

## **2. About ENERCON UK’s Business**

ENERCON UK is specialized in the sale, installation and after sales servicing of wind energy converters, operating in the renewable energy sector within the United Kingdom (UK). ENERCON UK is a subsidiary of the German company ENERCON GmbH. Both companies are part of the ENERCON Group, one of the worldwide market leaders within wind turbine manufacturing. The ENERCON Group is headquartered in Aurich, northwestern Germany.

As all companies within the ENERCON Group do, ENERCON UK shares the corporate vision:

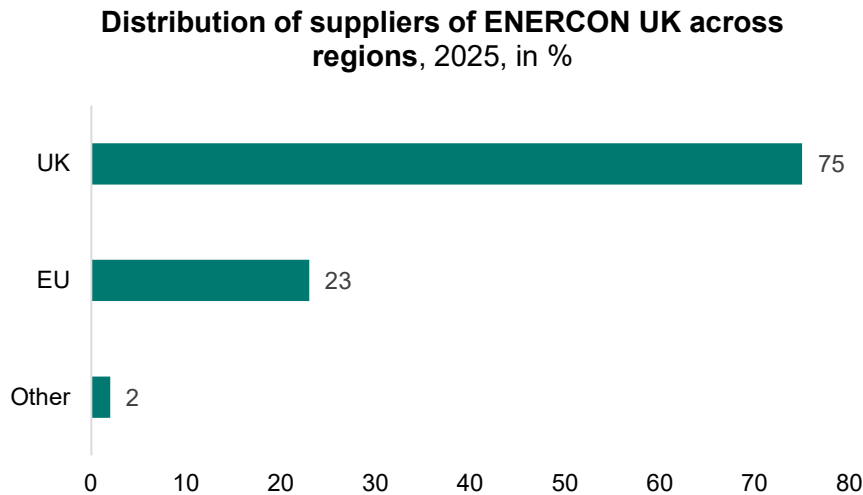
“Energy for the world”

The ENERCON Group underlies the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz, LkSG), which entered into force in 2023. The Act requires the ENERCON Group to conduct a thorough risk assessment to identify and address potential human rights risks associated within their own business and their supply chain including modern slavery and human trafficking. This includes evaluating the risks of ENERCON UK and the impact of the business on human rights and working conditions. Furthermore, the ENERCON Group has reporting obligations under the Canadian Supply Chain Act.

## **3. About ENERCON UK’s Supply Chain**

ENERCON UK recognizes that – besides its own business activities – its supply chain also plays a crucial role in its commitment to preventing modern slavery and human trafficking. It has over 200 suppliers who provide fundamental support to its organization. As a part of the ENERCON Group, ENERCON UK is closely connected to other companies within the Group and several of them are part of its supply

chain, sharing the same key values and requirements. In relation to our broader supplier list, although a significant portion of the value of our supplies come from members of the ENERCON Group, as the charts below illustrate most of our suppliers (by number) are based in UK. Most of the remaining suppliers are in the European Union (EU).



ENERCON UK takes the issue of modern slavery seriously and strives for transparency and ethical behavior both in its own operations and in its supply chain. The collaboration with its suppliers will be continuously monitored and reviewed. Any sign or acceptance of activities contrary to the Modern Slavery Act 2015 will prompt ENERCON UK to initiate a re-evaluation, potentially leading to the termination of the business relationship.

#### 4. Policy Framework

ENERCON UK and the ENERCON Group have developed and implemented policies and procedures to ensure that modern slavery and human trafficking are not taking place in any part of its business or supply chain.

**Code of Conduct:**

The Code of Conduct of the ENERCON Group is the highest regulatory framework for the actions of ENERCON UK and its common values form the basis of its corporate culture. The code demonstrates the commitment to respect and uphold human rights and sets clear expectations for the employees,

emphasizing their collective responsibility in preventing any form of exploitation within its business operations.

**Labour Law and Human Rights Policy:**

The Labour Law and Human Rights Policy of the ENERCON Group has been created in line with the United Nations Universal Declaration of Human Rights (International Bill of Human Rights), the European Convention for the Protection of Human Rights (Convention for the Protection of Human Rights and Fundamental Freedoms) and the United Nations Global Compact 10 principles. The policy states its commitment to avoid any form of modern slavery, forced labour or human trafficking.

**Whistleblowing Policy / Grievance Mechanism:**

ENERCON has established group-wide whistleblowing / grievance mechanisms that encourage employees, suppliers and other stakeholders to report any concerns and complaints. Confidentiality is ensured and anonymous reporting is possible without fear of retaliation. Employees and third parties may therefore use a range of channels including a digital Whistleblowing platform, which is available in ten languages.

Employees of ENERCON UK can also report to their manager, the Ethics & Compliance department or the Ombudsperson of the ENERCON Group. As part of the ENERCON Group, ENERCON UK takes every report seriously and investigates it conscientiously.

**Supplier Code of Conduct:**

The ENERCON Supplier Code of Conduct underscores its commitment to prevent modern slavery from its supply chain. It sets forth clear expectations for its suppliers, emphasizing the importance of compliance with anti-slavery legislation, the safeguarding of fundamental human rights, and the establishment of fair and ethical working conditions. The Supplier Code of Conduct is designed to ensure that suppliers are dedicated and committed to combating modern slavery and human trafficking.

## 5. Due Diligence Process

Respect for human rights - in its own business activities and in the supply chain - is a top priority for ENERCON UK. For this reason, a due diligence process has been implemented in close cooperation with the relevant corporate functions.

## 5.1. Risk Management and Preventive Measures

The ENERCON Group recognizes the critical importance of conducting comprehensive and ongoing risk assessments to identify and mitigate potential threats related to modern slavery. The ENERCON Group's commitment to transparency, responsibility, and ethical business practices drives it to continually assess and address risks within its value chain.

### **Own business activities:**

To effectively combat modern slavery, ENERCON UK employs a risk-based approach to identify potential vulnerabilities in its supply chain. As part of the implementation of the German LkSG, a comprehensive human rights risk analysis was carried out, in which the risk of modern slavery for ENERCON UK was also evaluated. Considering the business model and the qualifications required for this, the risk was assessed as medium on a scale from low to high in this analysis. Within the upcoming year of 2026, ENERCON UK will enhance its existing due diligence processes to identify and assess potential risks related to human rights, including modern slavery impacts. ENERCON UK Limited is resolutely committed to eliminating all forms of modern slavery.

Recognizing the importance of remaining vigilant and responsive to potential issues, the ENERCON Group has implemented a robust whistleblowing system and grievance mechanism. This mechanism allows not only ENERCON employees but also suppliers and their employees throughout the supply chain to report any concerns or incidents related to forced labor, child labor, or any other unethical practices directly and confidentially to the company. Repressive measures against whistleblowers are not tolerated at the ENERCON Group.

### **Supply Chain:**

To become a supplier or business partner of ENERCON UK, entities must meet specific criteria and undergo a thorough onboarding process. This process is applied to all critical prospective suppliers affiliated with companies within the ENERCON Group.

The Global Procurement department is performing procurement for ENERCON UK centrally. Here, an established due diligence system aims at monitoring, managing, and preventing any procurement-related adverse impacts on essential human rights, including the issue of modern slavery. This initiative commences with a supplier questionnaire that encompasses various aspects, including human rights.

It is imperative that the suppliers are not only committed to preventing modern slavery but also substantiate their dedication to these matters. ENERCON UK is actively avoiding the engagement with third parties who act contrary to the UK Modern Slavery Act 2015. Additionally, contracts entered between ENERCON UK and selected critical suppliers include its Supplier Code of Conduct, which the supplier must agree to follow before engaging in business with ENERCON UK. Therefore, it is guaranteed that all forms of slavery are rejected. If requested, the suppliers must provide ENERCON UK with a copy of the suppliers' Modern Slavery policies and/or a written statement in this matter.

Through the performance of the assessment, ENERCON UK did not identify any actual cases of modern slavery in its activities. Aware that potential risks may exist in the lower tiers of the supply chain, addressing these potential risks will be a focus area in the upcoming years.

## **5.2. Training and Awareness**

ENERCON UK is providing mandatory e-learning courses for all employees on prevention, identification and the risks of slavery, forced labour and human trafficking. Furthermore, training on modern slavery and its reporting process at ENERCON UK is part of the on-boarding process of each employee. The provided trainings will continuously be evaluated and improved to ensure that ENERCON UK's trainings meet all requirements existing within ENERCON as well as outside the company.

## **6. Future Plans**

In the coming year, ENERCON UK will improve its structures and evolve its approach to combat modern slavery. As ENERCON UK reflects on its commitment to eradicating modern slavery from its supply chain, it recognizes that ongoing efforts are crucial for sustainable change. In the pursuit of continuous improvement and ethical business practices, ENERCON UK outlines its plans for combatting modern slavery in its upcoming Modern Slavery Statement.

## **7. Approval of this statement**

This statement was approved by the Managing Director of ENERCON Wind Energy UK Limited in June 2026, with respect to the financial year 2025.

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Johan Terpstra

Managing Director ENERCON Wind Energy UK Limited