Siemens Energy Code of Conduct

for Suppliers and Third-Party Intermediaries

This Code of Conduct defines the basic requirements placed on the suppliers and third-party intermediaries of Siemens Energy concerning their responsibilities towards their stakeholders and the environment. The supplier and/or third-party intermediary declares herewith to:

Legal Compliance

- Comply with the laws and regulations of the applicable legal systems.

Human Rights

To ensure respect of all internationally proclaimed human rights by avoiding causation of and complicity in any human rights violations. Heightened attention shall be paid to ensuring respect of human rights of specifically vulnerable rights holders, such as women, children or migrant workers, or of (indigenous) communities.

- Prohibition of Forced Labor
  - Neither use nor contribute to slavery, servitude, forced or compulsory labor, oppression, exploitation and human trafficking.

- Prohibition of Child Labor
  - Employ no workers under the age of which compulsory schooling ends according to the law of the place of employment, provided that the age of employment is not less than 15 years or, in those countries subject to the developing country exception of the ILO Convention 138, employ no workers under the age of 14.
  - Employ no workers under the age of 18 for hazardous work according to ILO Convention 182.

- Non-Discrimination and Respect in employment
  - Ensure equal treatment of employees, irrespective of skin color, race, nationality, ethnicity, social background, health status, disabilities, gender, sexual identity and orientation, marital status, political opinion, ideological or religious conviction, belief, or age, and promote their equal opportunities.
  - Refuse to tolerate any unacceptable treatment of individuals such as mental cruelty, sexual harassment or discrimination including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.
  - Refrain from unnecessary restriction on freedom of movement, except for safety and security requirements.

- Freedom of association and collective bargaining
  - Recognize the legal rights of workers to form or join trade unions and to engage in collective bargaining; neither disadvantage nor prefer members of employee organizations or trade unions.

- Working Hours & Wages for Employees
  - Adhere to all applicable working-hours and rest breaks regulations.
  - Pay fair, at least minimum, wages required by applicable law.
  - In the event of cross-border personnel deployment adhere to all applicable legal requirements.

- Life, Health & Safety of Employees
  - Act in accordance with the applicable statutory and international standards regarding occupational health and safety and provide safe working conditions and, where applicable, adequate accommodation to safeguard health and wellbeing of employees.
  - Provide training and instruction to ensure employees are educated in health and safety issues.
  - Establish and apply a reasonable occupational health & safety management system[1].

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- Impact on communities
  - Refrain from unlawful eviction and / or unlawful deprivation of land, forests and waters.

- Security Forces

  When using private or state security forces, ensure that the human rights of employees and other rights holders are respected (in particular, no use of physical or psychological force, except in case of legitimate self-defense).

Environmental and Climate Protection, Protection of Natural Resources

- Act in accordance with the applicable statutory and international standards regarding the environment.
- Minimize environmental pollution and make continuous improvements in environmental protection.
- Establish a reasonable environmental management system[1].
- Not cause harmful soil change, water pollution, air pollution, harmful noise emission or excessive water consumption, which significantly impairs the basic existential needs or harms the health of a person.
- Reduce waste and ensure their proper treatment and disposal.

Fair Operating Practices

- Anti-Corruption and Bribery
  - Tolerate no form of and do not engage directly or indirectly in any form of corruption or bribery and do not grant, offer or promise anything of value to a government official or to a counterparty in the private sector to influence official action or obtain an improper advantage. This includes to renounce from giving or accepting improper facilitation payments.

- Fair Competition, Anti-Trust Laws and Intellectual Property Rights
  - Act in accordance with national and international competition laws and do not participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors.
  - Respect the intellectual property rights of others.

- Conflicts of Interest
  - Avoid and/or disclose internally and to Siemens Energy all conflicts of interest that may influence business relationships, and to avoid already the appearance thereof.

- Anti-Money Laundering, Terrorism Financing
  - Not directly or indirectly facilitate money laundering or terrorism financing.

- Data Privacy and Cybersecurity
  - Process personal data confidentially and responsibly, respect everyone's privacy and ensure that personal data is effectively protected and used only for legitimate purposes.
  - Commit to have an adequate Cybersecurity management framework established in its organization based on good industry practice, to ensure the confidentiality, authenticity, integrity, and availability of data, processes, products, systems and services.

- Foreign Trade Regulations

  Comply with the applicable export, import, customs and foreign trade regulations.

Responsible Minerals Sourcing

- Take reasonable efforts to avoid in its products the use of raw materials which originate from Conflict-Affected and High-Risk Areas and contribute to human rights abuses, corruption, the financing of armed groups or similar negative effects.

Grievance Mechanism

- Provide access to a protected mechanism for their employees to report possible violations of the principles of this Code of Conduct.
- Ensure protection of reporters or whistleblowers against any kind of retaliation.

Supply Chain

- Take reasonable measures to make its suppliers comply with the principles of this Code of Conduct and to verify this on a risk basis.
- Comply with the principles of non-discrimination with regard to supplier selection and treatment.

[1] https://www.siemens-energy.com/global/en/company/about/supply-chain-management/sustainability-in-the-supply-chain/ehs-management-systeme.html

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