Siemens Energy Responsible Raw Materials Sourcing Policy

www.siemens-energy.com/responsible-raw-materials

Introduction

Sustainability in its three dimensions (Environment, People & Society, Responsible Business Practices) is of the highest importance for Siemens Energy. Sustainable conduct forms the basis of our business decisions and dealings with our stakeholders.

Along with governments, NGOs, investors and many other companies worldwide, we are concerned about environmental degradation, climate change and human rights abuses –for instance forced labor, human trafficking, child labor and disregard of indigenous peoples' land rights – wherever they occur. We are equally concerned about the role that armed conflicts play in fueling extreme violence in so-called "Conflict-Affected and High-Risk Areas". This topic is addressed in the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" (OECD Due Diligence Guidance) and is reflected by legislators in various regions, including the United States of America and the European Union.

Our role in the Supply Chain

In order to ensure sustainability in our supply chain we have established the "Code of Conduct for Siemens Energy Suppliers and Third Party Intermediaries". We contractually commit our suppliers to this Code of Conduct and, in turn, expect them to promote these standards to their own suppliers. To verify these commitments, we have implemented various detection modules such as Sustainability Self Assessments and External Sustainability Audits.

Furthermore, we have implemented uniform and enterprise-wide processes to determine the use, source and origin of the relevant raw materials in our supply chain ("Supply Chain Due Diligence"). These processes are designed in accordance with internationally recognized due diligence frameworks and may make use of established industry assurance mechanisms, assessment methodologies, and risk mitigation approaches, where appropriate and permissible under applicable law. We work closely with our suppliers to carry out these steps to remediate risks and perform additional due diligence so that we can continue to source responsibly, building on established management processes.

 © Siemens Energy, 2026 Siemens Energy is a trademark licensed by Siemens AG.

Commitment

We are committed to identifying, assessing, and addressing risks associated with raw materials originating from conflict-affected and high-risk areas in our supply chain. Our approach takes into account the risks described in Annex II of the OECD Due Diligence Guidance. We do not encourage the implementation of a de facto embargo on conflict-affected and high-risk areas in the sourcing of the respective minerals and promote OECD-conformant responsible sourcing from such areas, including, for example, the Democratic Republic of the Congo. This also includes the responsible sourcing of raw materials from artisanal and small-scale mining. This is in line with our requirement to comply with the principles of non-discrimination with regard to supplier selection and treatment and aligns with the position of many internationally active human rights organizations.

Siemens Energy actively supports the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" as the basis for the development and implementation of the respective due diligence processes.

These processes expressly recognize a risk-based approach to due diligence in raw material supply chains and may draw on established industry-wide initiatives, assurance mechanisms, and assessment methodologies.

We are furthermore committed to complying with applicable due diligence requirements, including, where relevant, the EU Battery Regulation, the EU Conflict Minerals Regulation, the EU Deforestation Regulation or the Critical Raw Materials Act.

Relevant due diligence information will be shared with immediate downstream purchasers, while respecting business confidentiality and legitimate competitive concerns.

September 2026



Barbara Buttinger
Head of Procurement

 © Siemens Energy, 2026 Siemens Energy is a trademark licensed by Siemens AG.