

Realizing the UN Global Compact Advanced 2014

Vestas' Communication on Progress consists of the Annual Report 2014 combined with additional information about Vestas' sustainability initiatives at <u>vestas.com</u>. A pfd is prepared of the additional information on the web and both documents are uploaded to UN Global Compact.

This document provides a self-assessment of how Vestas' Communication on Progress lives up to the advanced level by providing references to the Annual Report 2014 and links to vestas.com respectively.

Reporting	Component	UNGC Suggested best practice	Vestas practice
	How is the accuracy and completeness of information in your COP assessed by a credible third-party?	Information is reviewed by multiple stakeholders (e.g., representatives of groups prioritized in stakeholder analysis)	
		Information is reviewed by a panel of peers (e.g., members of the same industry, competitors, benchmarked leaders, others organized via Global Compact Local Network)	Reviewed by peers in Global Compact Nordic Network
		Information is assured by independent assurors (e.g., accounting or consulting firm) using their own proprietary methodology	
COD description		Information is assured by independent assurors (e.g., accounting or consulting firm) against recognized assurance standard (e.g., ISAE3000, AA1000AS, other national or industry-specific standard)	Annual Report 2014, p 110
COP description		Other established or emerging best practices	
	The COP incorporates the following high standards of transparency and disclosure	Applies the Global Reporting Initiative (GRI) Sustainability Reporting Guidelines	Annual Report 2014, p 107 GRI Index
		Qualifies for Level B or higher of the GRI G3 or G3.1 application levels	GRI Index
		Is 'in accordance – core' with GRI G4	
		Is 'in accordance – comprehensive' with GRI G4	
		Provides information on the company's profile and context of operation	Corporate governance Annual Report 2014, pp 17, 20-27, 101- 103



Dimension	Criterion	UNGC Suggested best practice	Vestas practice
		Place responsibility for execution of sustainability strategy in relevant corporate functions (procurement, government affairs, human resources, legal, etc.) ensuring no function conflicts with company's sustainability commitments and objectives.	Suppliers Partnership Against Corruption Initiative
		Align strategies, goals and incentive structures of all business units and subsidiaries with corporate sustainability strategy.	Management systems
	1: The COP describes	Assign responsibility for corporate sustainability implementation to an individual or group within each business unit and subsidiary.	Organising sustainability
	mainstreaming into corporate functions and	Design corporate sustainability strategy to leverage synergies between and among issue areas and to deal adequately with trade-offs.	
Implementing the	business units	Ensure that different corporate functions coordinate closely to maximize performance and avoid unintended negative impacts.	Management systems Stakeholder engagement Suppliers
-		Other established or emerging best practices	
Ten Principles into Strategies and Operations		Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff	
	2: The COP describes value chain implementation	Analyze each segment of the value chain carefully, both upstream and downstream, when mapping risks, opportunities and impacts.	Management systems Safety standards
		Communicate policies and expectations to suppliers and other relevant business partners.	Suppliers
		Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company's sphere of influence.	Suppliers
		Undertake awareness-raising, training and other types of capability building with suppliers and other business partners.	Suppliers
		Other established or emerging best practices	
		Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff	



Issue Area	Criterion	UNGC Suggested best practice	Vestas practice
	3: The COP	Commitment to comply with all applicable laws and respect internationally recognized human rights, wherever the company operates (e.g. the Universal Declaration of Human Rights, Guiding Principles on Human Rights) (BRE1 + ARE1)	Annual Report 2014, p 31-32 <u>Code of Conduct</u> <u>Human rights and labour</u>
	describes robust	Integrated or stand-alone statement of policy expressing commitment to respect and support human rights approved at the most senior level of the company (BRE 1 + BRE5 + ARE 1 + ARE 5)	Annual Report 2014, p 31-32 <u>Code of Conduct</u>
	commitments, strategies or	Statement of policy stipulating human rights expectations of personnel, business partners and other parties directly linked to operations, products or services (BRE 1)	Annual Report 2014, p 31-32 Human rights and labour
	policies in the area of human	Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties (BRE 1 + BRE 5 + ARE 1 + ARE 5)	Code of Conduct
	rights	Other established or emerging best practices	
	0	Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff	
		Process to ensure that internationally recognized human rights are respected	
		On-going due diligence process that includes an assessment of actual and potential human rights impacts (BRE 2 + BRE 3 + ARE 2 + ARE 3)	Annual Report 2014, p 31-32 <u>Human rights and labour</u>
Robust Human	4: The COP describes	Internal awareness-raising and training on human rights for management and employees	Annual Report 2014, p 31-32 <u>Human rights and labour</u>
Rights	effective	Operational-level grievance mechanisms for those potentially impacted by the company's activities (BRE4 +ARE4)	
Management	management	Allocation of responsibilities and accountability for addressing human rights impacts	Human rights and labour
Policies &	systems to	Internal decision-making, budget and oversight for effective responses to human rights impacts	<u>Human rights and labour</u>
Procedures	integrate the human rights	Processes to provide for or cooperate in the remediation of adverse human rights impacts that the company has caused or contributed to (BRE 3+ BRE 4 + ARE 4)	Human rights and labour
	principles	Process and programs in place to support human rights through: core business; strategic philanthropic/social investment; public policy engagement/advocacy; partnerships and/or other forms of collective action (BRE 6 + ARE 6)	
		Other established or emerging best practices	
		Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff	
	5: The COP	System to monitor the effectiveness of human rights policies and implementation	<u>Suppliers</u>
	describes	with quantitative and qualitative metrics , including in the supply chain (BRE3 + ARE3)	<u>Human rights and labour</u>
		Monitoring drawn from internal and external feedback, including affected stakeholders	
	effective	Leadership review of monitoring and improvement results	
	monitoring	Process to deal with incidents the company has caused or contributed to for internal and external stakeholders (BRE 4 + ARE 4)	
	and	Grievance mechanisms that are legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of	<u>EthicsLine</u>
	evaluation	continuous learning, and based on engagement and dialogue (BRE4 + ARE4)	6 11
	mechanisms	Outcomes of integration of the human rights principles	Suppliers
	of human	Other established or emerging heat practices	Human rights and labour
	rights	Other established or emerging best practices Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals,	
	integration	timelines, metrics, and responsible staff	



Issue Area	Criterion	UNGC Suggested best practice	Vestas practice
	6: The COP describes robust	Reference to principles of relevant international labour standards (ILO Conventions) and other normative international instruments in company policies	Annual Report 2014, p 31-32 Code of Conduct
		Reflection on the relevance of the labour principles for the company	Annual Report 2014, p 31-32 Code of Conduct
		Written company policy to obey national labour law, respect principles of the relevant international labour standards in company operations worldwide, and engage in dialogue with representative organization of the workers (international, sectoral, national).	Annual Report 2014, p 31-32 Code of Conduct
		Inclusion of reference to the principles contained in the relevant international labour standards in contracts with suppliers and other relevant business partners	Suppliers
	commitments, strategies or	Specific commitments and Human Resources policies, in line with national development priorities or decent work priorities in the country of operation	
	policies in the area of labour	Participation and leadership in wider efforts by employers' organizations (international and national levels) to jointly address challenges related to labour standards in the countries of operation, possibly in a tripartite approach (business – trade union – government).	
		Structural engagement with a global union, possibly via a Global Framework Agreement	
		Other established or emerging best practices	
		Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff	
Robust Labour		Risk and impact assessments in the area of labour	Human rights and labour
Management	7: The COP describes effective management systems to integrate the labour principles	Dialogue mechanism with trade unions to regularly discuss and review company progress in addressing labour standards	
Policies &		Allocation of responsibilities and accountability within the organisation	Human rights and labour
		Internal awareness-raising and training on the labour principles for management and employees	Human rights and labour
Procedures		Active engagement with suppliers to address labour-related challenges	
		Grievance mechanisms, communication channels and other procedures (e.g., whistleblower mechanisms) available for workers to report concerns, make suggestions or seek advice, designed and operated in agreement with the representative organization of workers	<u>EthicsLine</u>
		Other established or emerging best practices	
		Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff	
	8: The COP describes effective monitoring and evaluation mechanisms of labour principles integration	System to track and measure performance based on standardized performance metrics Dialogues with the representative organization of workers to regularly review progress made and jointly identify priorities for the future	
		Audits or other steps to monitor and improve the working conditions of companies in the supply chain, in line with principles of international labour standards	Suppliers
		Process to positively engage with the suppliers to address the challenges (i.e., partnership approach instead of corrective approach) through schemes to improve workplace practices	
		Outcomes of integration of the Labour principles	Human rights and labour
		Other established or emerging best practices	
		Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff	



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		Reference to relevant international conventions and other international instruments (e.g., Rio Declaration on Environment and Development)	Annual Report 2014, p 31 Code of Conduct
	9: The COP	Reflection on the relevance of environmental stewardship for the company	Annual Report 2014, p 33
	describes robust commitments,	Written company policy on environmental stewardship	Sustainability policies
		Inclusion of minimum environmental standards in contracts with suppliers and other relevant business partners	<u>Suppliers</u>
	strategies or	Specific commitments and goals for specified years	<u>Carbon footprint</u>
	policies in the area		Renewable energy
	of environmental		Recyclability
	stewardship	Other established or emerging best practices	
		Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff	
		Environmental risk and impact assessments	Management systems
	10: The COP	Assessments of lifecycle impact of products, ensuring environmentally sound end-of-life management	Annual Report 2014, p 33
	describes effective	policies	<u>Life cycle assessment</u>
Robust		Allocation of responsibilities and accountability within the organisation	Organising sustainability
Environmental	management	Internal awareness-raising and training on environmental stewardship for management and employees	Training
Management	systems to integrate the environmental principle	Grievance mechanisms, communication channels and other procedures (e.g., whistleblower	<u>EthicsLine</u>
_		mechanisms) for reporting concerns or seeking advice regarding environmental impacts	
Policies &		Other established or emerging best practices	
Procedures		Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff	
	11: The COP describes effective monitoring and evaluation mechanisms for environmental stewardship	System to track and measure performance based on standardized performance metrics	Annual Report 2014, p 9
			Selected environmental data
		Leadership review of monitoring and improvement results	Management systems
		Process to deal with incidents	Global standards and processes
		Audits or other steps to monitor and improve the environmental performance of companies in the	<u>Suppliers</u>
		supply chain	
		Outcomes of integration of the environmental principles	Annual Report 2014, p 9
			Selected environmental data
			Annual Report 2014, p 33, 108-109
			<u>Carbon footprint</u>
		Other established or emerging best practices	
		Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this	
		criterion, including goals, timelines, metrics, and responsible staff	



Issue Area	Criterion	UNGC Suggested best practice	Vestas practice
		Publicly stated formal policy of zero-tolerance of corruption (D1)	Annual Report 2014, p 31 Code of Conduct
	12: The COP describes robust commitments, strategies or	Commitment to be in compliance with all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes (B2)	Code of Conduct Partnership Against Corruption Initiative
		Statement of support for international and regional legal frameworks, such as the UN Convention against Corruption (D2)	Partnership Against Corruption Initiative
	policies in the	Detailed policies for high-risk areas of corruption (D4)	Partnership Against Corruption Initiative
	area of anti-	Policy on anti-corruption regarding business partners (D5)	
	corruption	Other established or emerging best practices	
		Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff	
		Support by the organization's leadership for anti-corruption (B4)	Organising sustainability
		Carrying out risk assessment of potential areas of corruption (D3)	
Robust Anti- Corruption	13: The COP describes	Human Resources procedures supporting the anti-corruption commitment or policy, including communication to and training for all employees (B5 + D8)	Code of Conduct
•	effective	Internal checks and balances to ensure consistency with the anti-corruption commitment (B6)	
Management	management	Actions taken to encourage business partners to implement anti-corruption commitments (D6)	<u>Suppliers</u>
Policies &	systems to	Management responsibility and accountability for implementation of the anti-corruption commitment or policy (D7)	
Procedures	integrate the	Communications (whistleblowing) channels and follow-up mechanisms for reporting concerns or seeking advice (D9)	<u>EthicsLine</u>
	anti-corruption	Internal accounting and auditing procedures related to anticorruption (D10)	
	principle	Other established or emerging best practices	
		Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff	
	14: The COP	Leadership review of monitoring and improvement results (D12)	Organising sustainability
	describes	Process to deal with incidents (D13)	<u>EthicsLine</u>
	effective monitoring and evaluation mechanisms for	Public legal cases regarding corruption (D14)	
		Use of independent external assurance of anti-corruption programmes (D15)	
		Outcomes of integration of the anti-corruption principle	Partnership Against Corruption Initiative
	the integration	Other established or emerging best practices	
	of anti-corruption	Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff	



Dimension	Criterion	UNGC Suggested best practice	Vestas practice
	15: The COP describes core business	Align core business strategy with one or more relevant UN goals / issues.	Annual Report 2014, p 26-27 Sustainable products
		Develop relevant products and services or design business models that contribute to UN goals / issues.	Annual Report 2014, p 26-27 Sustainable products
	contributions	Adopt and modify operating procedures to maximize contribution to UN goals / issues.	Annual Report 2014, p 31-33 <u>Carbon footprint</u>
	to UN goals and	Other established or emerging best practices	
	issues	Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff	
		Pursue social investments and philanthropic contributions that tie in with the core competences or operating context of the company as an integrated part of its sustainability strategy.	
Taking	16: The COP describes	Coordinate efforts with other organizations and initiatives to amplify – and not negate or unnecessarily duplicate – the efforts of other contributors.	
Action in	strategic social investments	Take responsibility for the intentional and unintentional effects of funding and have due regard for local customs, traditions, religions, and priorities of pertinent individuals and groups.	<u>Communities</u>
Support of	and philanthropy	Other established or emerging best practices	
Broader		Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff	
UN Goals	17: The COP	Publicly advocate the importance of action in relation to one or more UN goals / issues.	Political affairs
and Issues	describes advocacy and	Commit company leaders to participate in key summits, conferences, and other important public policy interactions in relation to one or more UN goals / issues.	
	public	Other established or emerging best practices	
	policy engagement	Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff	
	18: The COP describes partnerships and collective action	Develop and implement partnership projects with public or private organizations (UN entities, government, NGOs, or other groups) on core business, social investments and/or advocacy.	WindMade UN Sustainable Energy for All
		Join industry peers, UN entities and/or other stakeholders in initiatives that contribute to solving common challenges and dilemmas at the global and/or local levels with an emphasis on initiatives that extend the company's positive	Memberships Active member of PACI taskforce
		impact on its value chain.	
		Other established or emerging best practices Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff	



Dimension	Criterion	UNGC Suggested best practice	Vestas practice
	19: The COP	CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN Global Compact.	CEO statement
		CEO promotes initiatives to enhance sustainability of the company's sector and leads development of industry standards.	Sustainable Energy for All
	describes CEO	CEO leads executive management team in development of corporate sustainability strategy, defining goals and overseeing implementation.	Annual Report 2014, p 10
	commitment and leadership	Make sustainability criteria and UN Global Compact principles part of goals and incentive schemes for CEO and executive management team.	
		Other established or emerging best practices	
		Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff	
Corporate	20: The COP describes Board adoption and oversight	Board of Directors (or equivalent) assumes responsibility and oversight for long term corporate sustainability strategy and performance.	Organising sustainability
Sustainability		Board establishes, where permissible, a committee or assigns an individual Board member with responsibility for corporate sustainability.	
Governance and Leadership		Board (or committee), where permissible, approves formal reporting on corporate sustainability (Communication on Progress).	Board approves Annual Report
		Other established or emerging best practices	
		Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff	
	21: The COP describes stakeholder engagement	Publicly recognize responsibility for the company's impacts on internal and external stakeholders.	Relations with stakeholders
		Define sustainability strategies, goals and policies in consultation with key stakeholders.	
		Consult stakeholders in dealing with implementation dilemmas and challenges and invite them to take active part in	Stakeholder engagement
		reviewing performance.	Material issues
		Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect 'whistle-blowers'.	<u>EthicsLine</u>
		Other established or emerging best practices	
		Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff	



Dimension	Component	UNGC Suggested best practice	Vestas practice
	The COP describes policies and practices related to the	Information on how policies, strategies and operating practices have been adapted to the specific high- risk/conflict context based on due diligence	Annual Report 2014, p 32 Communities
		Adherence to best practices even where national law sets a lower standard, including in the management of security services	
	company's core	Management of the supply chain to avoid contributing to conflict through purchasing decisions and practices	
	business operations in	Other established or emerging best practices	
	high-risk or conflict- affected areas	Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff	
	The COP describes policies and practices related to the company's government relations in high-risk or conflict-affected areas	Assessment of opportunities for constructive engagement with government actors in order to support peace	
A NINIEW.		Measures undertaken to avoid complicity in human rights violations by government actors	
ANNEX:		Management practices aimed at preventing corrupt relationships with government officials	Partnership Against Corruption Initiative
Business		Other established or emerging best practices	
& Peace		Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff	
	The COP describes local stakeholder engagement and strategic social investment activities of	Assessment of opportunities for constructive engagement with government actors in order to support peace	
		Stakeholder engagement mechanisms across company and contractor operations	
		Approaches to stakeholder engagement involving civil society, international organizations, etc	
		Actions toward constructive and peaceful company-community engagement	
		Sustainable social investment projects	Communities
	the company in high-	Other established or emerging best practices	
	risk or conflict-affected areas	Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff	