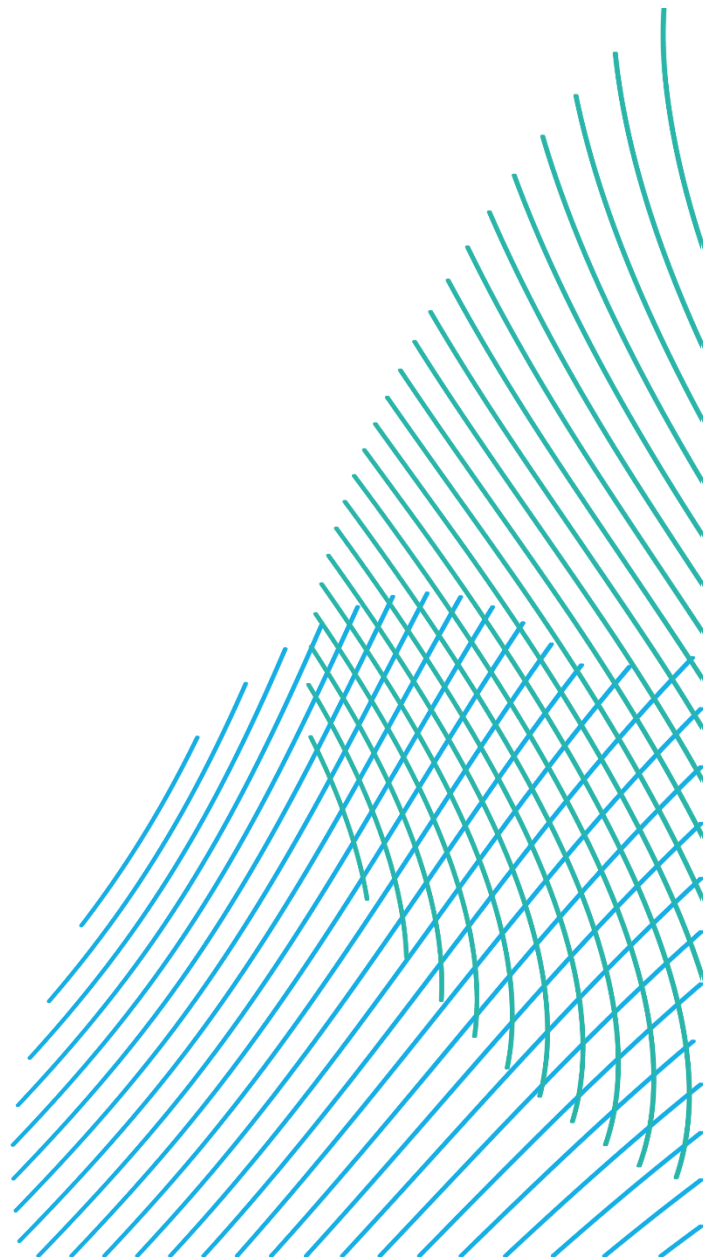


# RWE

## Human Rights Rules of Procedure

**Version 1**  
**March 2023**



# 1. Scope of the procedure

The Complaints Procedure is an integral part of the Human Rights Risk Management System (HRRMS). It encompasses the operationalisation for handling all the complaints related to the entire company, including its own activities as well as upstream and downstream stages of the value chain. This covers business partners, RWE's direct and indirect suppliers, as well as to any other interested third party.

Any human right and environmental risks or breaches of duty can be transmitted in the form of a complaint, information or notice, using the channels laid out in the Complaints Procedure<sup>1</sup>.

## 2. Complaints channels

The company has established different internal and external two-way channels to receive any complaint, information or notice on human rights and environment-related risks or breaches.

The channels linked with the Complaints Procedure correspond to an internal platform denominated BKMS (i.e., Business Keeper Management System), where all employees from RWE can have access to report or raise a complaint.

For external stakeholders, a dedicated email for human rights has been established. Furthermore, the law firm Simmons & Simmons LL.P. can be approached. Both external channels can be accessed directly from RWE's website: [Whistleblower System \(rwe.com\)](https://www.rwe.com/whistleblower).

Anonymity is guaranteed when necessary. No cost is bared by the complainant / whistleblower in the use of these bidirectional channels. Complaints can be raised in local language.

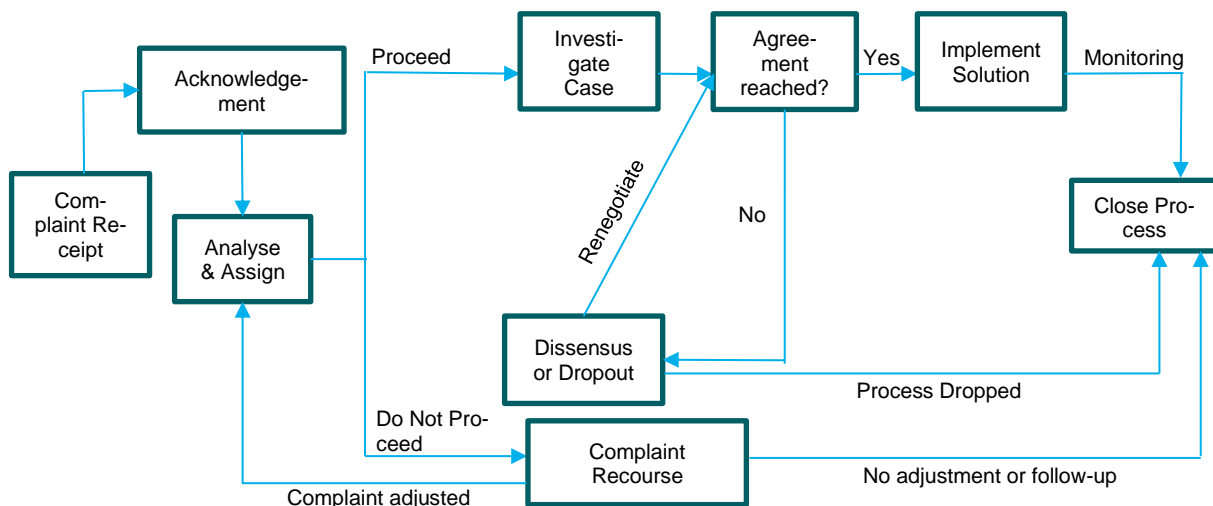
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<sup>1</sup> As covered by § 2 paras. 2 and 3 of the Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz – LkSG).

### 3. How the Complaints Procedure works

Once a complaint is received it must be thoroughly assessed. If the complaint is deemed to have reasonable grounds to support a reported situation on potential risks or actual impacts on human rights or environmental obligations, then it will become a case.

If the complaint becomes a case, then it follows an appropriate investigation, aiming always to reach a positive agreement. All interested parties are informed. If it does not become a case, the complainant is also informed in order to provide the opportunity to make corresponding adjustments. If no adequate improvements are reached, the process is closed and the related parties are informed.



Source: RWE Group Sustainability, 2022

The process is composed of specific administrative steps and timeframes. The overall pathway presented above is further described in the table below.

Action	Description	Timeframe
<b>Complaint Receipt and Acknowledgement</b>	Reception of the complaint through communication channel (internal or external), informing the complainant / whistle-blower an acknowledgement of receipt, informing key further steps of the process.	Maximum 7 working days
<b>Analyse &amp; Assign</b>	Assess whether the complaint has substantial grounds and its relation with applicable laws, e. g. the LkSG.  <b>If applicable:</b> <ul style="list-style-type: none"> <li>Formalisation of the complaint into a case.</li> <li>Assign the person responsible for investigating.</li> </ul>	<b>If applicable:</b> Day 1, maximum 7 working days starting from the case formalisation.

	<ul style="list-style-type: none"> <li>Notify the complainant / whistle-blower, including responsible person, investigation phase steps and estimated timeframe.</li> </ul> <p><b>If not applicable:</b></p> <ul style="list-style-type: none"> <li>If the complaint is incomplete or unfounded, further information can be requested in order to satisfy the minimum requirements (<b>Complaint Recourse</b>).</li> <li>If the complaint is not amended, discontinuance can be followed. This will lead to the closure of the process and the Complainant / Whistle-blower is informed.</li> </ul>	<p><b>If not applicable:</b> Day 1, maximum 15 working days starting from the formal request of further information to be provided from the complainant side. New requests reset the time.</p>
<b>Investigate Case</b>	<p>The assigned person investigates the case and explores options for a solution, within the company, and-or direct or indirect suppliers, depending on the context.</p> <p>If feasible, the complainant's / whistle-blower's opinion is considered for the definition of the remedial actions.</p>	<p>Maximum 20 working days starting from the case formalisation, the complainant / whistle-blower is informed.</p>
<b>Solution/Agreement</b>	<p>Seek solution within the company and, when feasible/required, with the complainant / whistle-blower. Inform the complainant / whistle-blower about the solution chosen.</p> <p><b>Solution agreed:</b> If the alignment and the agreement are reached, the solution is implemented.  <b>No agreement:</b> If the alignment and the agreement were not reached, <b>Dissensus or Dropout</b> could follow.</p>	<p>Maximum 8 working days starting from the closure of the "<b>Investigate Case</b>" action.</p>
<b>Implement solution</b>	<p>Implement plan/actions agreed within the company and, when feasible/required, with the complainant / whistle-blower.</p> <p>All the relevant records of implementation, through an appropriate monitoring for compliance, to assess effectiveness of the management actions are gathered and reported.</p> <ul style="list-style-type: none"> <li>If the solution implementation requires longer than foreseen and informed, it will be communicated to the complainant.</li> </ul>	<p>Written formalisation and the start of implementation have a maximum of 3 working days from the internal approval of the plan. The complainant / whistle-blower is informed.</p>
<b>Dissensus or Dropout</b>	<ul style="list-style-type: none"> <li>In order to prevent dissensus or dropout, an immediate new round of conversation to renegotiate a solution is triggered, seeking to find a solution, including the complainant / whistle-blower suggestion, whenever feasible.</li> <li>If new conversation do not reach an agreed, the negotiation could continue with an external support (see point "<b>4. Amicable dispute resolution</b>").</li> <li>If the disagreement persists, the complainant has the option to pursue other actions. If the complainant pursues further actions, the case is put "on-</li> </ul>	<p><b>Agreement reached:</b> Maximum 10 working days to implement plan/action, starting from the "<b>Solution agreed</b>" confirmation from all the related parties.</p> <p><b>No agreement reached:</b> Renegotiation start no</p>

	<p>hold” and it is further tracked.</p> <ul style="list-style-type: none"> <li>The dropout of the case triggers the closure of the process. Records include all related documentation as evidence and backups for the information given to the interested party (including the complainant / whistle-blower) on the closure of the case and reasons supporting it.</li> </ul>	<p>later than 3 working days from the “No Agreement reached” confirmation from any of the related parties.</p> <p>If the process follows a support from an external party or a legal path, the case is put “on-hold” until the case reaches an agreement (and moves to the next step) or if it is dropped out.</p>
<b>Close</b>	<p>The complainant / whistle-blower and any other relevant third party involved in the management of the case are informed formally.</p> <p>All related documentation is stored for a minimum of seven (7) years from the date of closure of the case.</p> <p>The closure of the case management is established.</p>	<p>Maximum of 3 working days after the official internal confirmation that the implementation phase of the plan has been reached in accordance with the timetable set out in the plan.</p>

**Source: RWE Group Sustainability, 2022**

## 4. Amicable dispute resolution

When there is no agreement between the company and the complainant / whistle-blower, RWE considers the opportunity to provide also the option for an amical dispute resolution (e.g., mediation).

If the different rounds of conversations do not reach an agreed end for a positive resolution of the case, the negotiation could continue with an external support (third party).

When using this option, a third party is involved by RWE, with the acceptance of the complainant / whistle-blower, considering that the external support does not benefit from the resolution of the complaint and its mediation is accepted by both parties.

## 5. Contact persons for the whistle-blowers / complainant

The contact persons for the complainant / whistle-blower are located in Group Sustainability in RWE AG under the supervision of the Head of Sustainability: [Responsibility and sustainability \(rwe.com\)](https://www.rwe.com/en/sustainability).

## 6. Ensuring effective protection against disadvantage or punishment as a result of a complaint

The roles connected to the Complaints Procedure, while ensuring the protection and promotion of human rights across the organization and within the business partners, act impartially.

In order to do so, they are not bound by instructions and sworn to secrecy in the performance of their duties. The complainant / whistle-blower is protected from any disadvantage or punishment as a result of the report submission and overall handling. They can report anonymously and through confidential reporting channels, hence the disclosing of personal information of people filing a complaint is prohibited. This is ensured by the Data Protection Department responsible for the protection of personal data in accordance with Germany's Federal Data Protection Act (BDSG).

Retaliation for complaints is not tolerated.

If the company is informed or becomes aware of any retaliation, the company will take the necessary disciplinary actions (internal and/or legal) to tackle and to prevent any further re-iteration.

**RWE Aktiengesellschaft**

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