

The RWE logo is displayed in a bold, white, sans-serif font at the top center of the page. The background of the entire page is a photograph of a solar farm with rows of solar panels under a clear blue sky. In the foreground, two workers in orange safety vests and white hard hats are walking through a field of dry grass. A decorative graphic of blue lines forming a grid pattern is visible in the bottom left corner.

**RWE**

# Carrying responsibility together.

Supplementary  
Sustainability Report 2024

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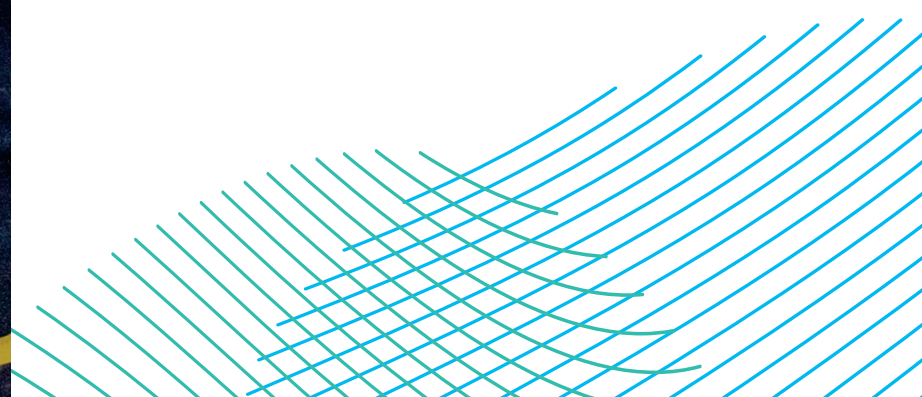


# 01

## Introduction

About this report

04



## About this report

In 2024, we adopted the European Sustainability Reporting Standards (ESRS) and consequently the Corporate Sustainability Reporting Directive (CSRD) as the basis for our sustainability reporting.

With the first-time application of ESRS for fiscal 2024, our annual report provides comprehensive disclosures based on the double materiality assessment (DMA). It includes a description of our sustainability strategy, overall approaches, actions, targets and metrics. For details, please see the Group Sustainability Statement in the [RWE Annual Report 2024](#).

This additional Supplementary Sustainability Report only covers aspects that are not already included in the Annual Report.

As a result of the DMA, we have identified five overarching material sustainability topics.

### Material environmental topics

Climate change (1) was identified as a material topic for the environmental dimension, with the sub-topics of climate change mitigation, adaptation and energy. In addition to climate change, the environmental topics of biodiversity (2) and circular economy (3) were also identified as material.

### Material social topics

In the social dimension, the topics of our own workforce (4) in terms of working conditions, and workers in the value chain (5) in connection with human rights aspects were identified as material.

Although a number of sustainability topics were not identified as material on the basis of our DMA, they remain relevant for a number of stakeholders and are also requested for ESG ratings. This supplementary report bridges the gap between the core disclosures on the material sustainability topics in the RWE Annual Report 2024 and these additional sustainability topics, underscoring our commitment to comprehensively address various facets of our sustainability activities.

This report provides insight into our management of the sustainability topics listed below and the relevant key performance indicators (KPIs), including steps to mitigate environmental impacts, advance social responsibility and enhance governance processes.

### Environmental topics

- Water
- Pollution control and air quality

### Social topics

- Diversity, equity and inclusion
- Community engagement
- Employment, training and skills development

### Governance topics

- (Cyber) Security
- Data protection

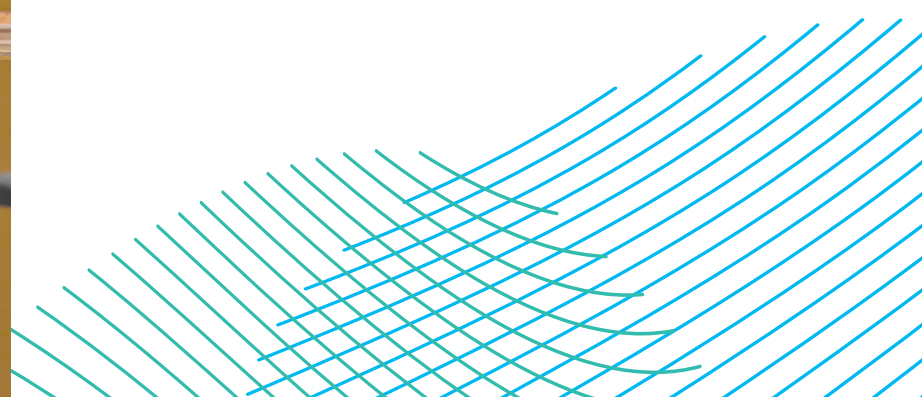
We hope that this report serves as a valuable resource for our stakeholders.



# 02

## Environment

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# Water

## The challenge

RWE faces challenges in water management as part of its operations, mainly in opencast mines and for cooling purposes and we are dependent on the availability of water for a variety of power generation technologies. It is crucial for RWE to ensure a secure water supply for its operations, the local population and the local economy as well as to protect wetlands, especially in mining areas that are vulnerable to drying out.

## Our ambitions

We have set ourselves a water-related environmental intensity target of reducing total water consumption per MWh of electricity production by 40% by 2030, compared to a baseline year 2022. This target refers to our specific water consumption, which is the difference between water withdrawal and water discharge divided by the electricity generated. Our ambitions include conserving water and regularly monitoring our operations to reliably protect the environment as best as we can while ensuring compliance with all legal requirements and permit obligations.

## Our approach

With our technological precautions, routine evaluations and effective wastewater treatment, we proactively ensure that surface waters and groundwater remain uncontaminated and that all activities impacting surface waters are documented. Environmental effects on rivers and groundwater are assessed against current licenses, limits, expert benchmarks and operational results from previous years. The findings are evaluated for significance by our internal experts and a consortium of governmental bodies, associations, and accredited external specialists.

In Germany, the Netherlands and the United Kingdom, water extraction varies by power plant technology: gas-fired plants utilise channels, rivers, seas and groundwater, while hard coal plants draw from seas and rivers and lignite-fired stations from groundwater. In Turkey, water is sourced from deep wells for our combined cycle gas-fired station. All withdrawals comply with national regulations, forming the foundation of our operational licenses.

Overall, we discharge approximately 98% of the clean water back into surface waters such as rivers, lakes and seas.

## Progress

- Compared to the previous year, we improved our CDP Water Security score from a C to a B in 2024. The CDP assesses and scores organisations on four consecutive levels: Disclosure, Awareness, Management and Leadership, representing the steps an organisation takes on the path to greater environmental stewardship. With an overall B score, RWE achieves a Management score, which means that RWE manages its environmental impacts and is taking measures that distinguish it as a leader in its field.
- In 2024, we commenced planning for the approval procedure to construct a 45-kilometer pipeline from the Rhine near Dormagen to the Garzweiler and Hambach opencast mines. This initiative is integral to our objective to begin recultivation of the Hambach mine by 2030. The pipeline is designed to fill in the pits at the then closed opencast mines, permanently stabilise groundwater conditions in the Rhenish mining area and provide water to support local wetlands.

## Indicators

For data reporting on water withdrawal, water discharge and water consumption, please see the Environmental KPI table on page 8.

## Pollution control and air quality

### The challenge

In addition to greenhouse gases, our conventional power plants for electricity and heat generation produce other emissions, including sulphur dioxide (SO<sub>2</sub>), nitrogen oxides (NOx) and dust (particulate matter). These emissions can impact the environment and are subject to increasingly stringent regulations.

### Our ambitions

Our goal is to further reduce emissions from our plants and to advance research to prevent future emissions. We have set ourselves environmental intensity targets at the Group level to reduce NOx emissions per MWh by 35% and SO<sub>2</sub> emissions per MWh by 70% by 2030, compared to a baseline year 2022.

### Our approach

For decades, RWE has implemented comprehensive measures to ensure Best Available Techniques (BAT) are adopted, so that emissions are minimised and remain below the thresholds established to protect human health and the environment. We maintain robust monitoring facilities and engage in active communication with regulatory authorities at our sites. Sulphur oxides (SOx) and nitrogen oxides (NOx) are the primary by-products of conventional generation units.

Conventional combustion plants, in particular those utilising coal and lignite, as well as flexible generation utilising biomass, also directly emit fine particles and contribute to secondary particulate formation in the atmosphere through chemical reactions involving SOx and NOx emissions. Dust primarily originates from the operation of our opencast mining facilities and construction activities, potentially affecting air quality. RWE employs extensive clean-air purification techniques to effectively reduce our impact.

Most of our conventional power plant portfolio operates in the European Union and the United Kingdom. The EU Commission's Best Available Techniques Reference Document for Large Combustion Plants (BREF LCP) guides us in further reducing pollutants, including nitrogen oxides, sulphur dioxide and dust. We strictly adhere to statutory emission limits through primary and secondary reduction measures. This includes optimising combustion technologies and applying methods such as dust removal and desulphurisation during operations. With tailored technical solutions, the objective is to further minimise our impact. We observe and comply with the legal requirements and approval legislation.

### Progress

- We successfully complied with all relevant thresholds in 2024.

### Indicators

We report metrics related to sulphur dioxide (SO<sub>2</sub>), nitrogen oxides (NOx) and dust. Please see the Environmental KPI table on page 9.

## Environmental KPIs

### Water

Metric	Unit	2024	2023	2022
<b>Total volume of water withdrawal</b>	million m <sup>3</sup>	<b>4,225</b>	<b>4,662</b>	<b>4,747<sup>1</sup></b>
of which: surface water	million m <sup>3</sup>	1,293	1,446	1,603
of which: groundwater	million m <sup>3</sup>	460	483	500
of which: water from third parties	million m <sup>3</sup>	3	4	4
of which: seawater / brackish water	million m <sup>3</sup>	2,470	2,729	2,641
<b>Total volume of water discharge</b>	million m <sup>3</sup>	<b>4,129</b>	<b>4,505</b>	<b>4,591</b>
of which: surface water	million m <sup>3</sup>	1,632 <sup>2</sup>	1,739 <sup>2</sup>	1,912 <sup>2</sup>
of which: water to third parties	million m <sup>3</sup>	27	36	38
of which: seawater / brackish water	million m <sup>3</sup>	2,470 <sup>2</sup>	2,730 <sup>1,2</sup>	2,641 <sup>2</sup>
<b>Total water consumption</b>	million m <sup>3</sup>	<b>96</b>	<b>157</b>	<b>156<sup>1</sup></b>
Specific water consumption	m <sup>3</sup> / MWh	1	1	1

1 Values have changed compared to the data published in previous year due to an extended scope and rounding adjustments.

2 Values have been updated due to corrected allocation between discharge into surface water and discharge into seawater. Total volume of water discharge unchanged.

#### Accounting principles

- The water category definitions are based on GRI 303: Water and effluents (2018).
- **Specific water consumption:** standardised to electricity generation (excluding contracted power plants).



## Pollution control and air quality

Metric	Unit	2024	2023	2022
NOx emissions	thousand metric tons	29.59	33.68	46.83 <sup>1</sup>
SO <sub>2</sub> emissions	thousand metric tons	8.21	9.33	13.66 <sup>1</sup>
Dust emissions	metric tons	1,540.46	1,666.76 <sup>1</sup>	2,120.07 <sup>1</sup>
NOx emission intensity	g/kWh	0.25	0.26	0.30
SO <sub>2</sub> emission intensity	g/kWh	0.07	0.07	0.09
Dust emission intensity	g/kWh	0.01	0.01	0.01
NOx emission intensity, lignite	g/kWh	0.75	0.75	0.73
NOx emission intensity, hard coal	g/kWh	0.41	0.38	0.35
NOx emission intensity, gas	g/kWh	0.17	0.18 <sup>1</sup>	0.19 <sup>1</sup>
SO <sub>2</sub> emission intensity, lignite	g/kWh	0.24	0.26 <sup>1</sup>	0.25
SO <sub>2</sub> emission intensity, hard coal	g/kWh	0.16	0.13	0.14
SO <sub>2</sub> emission intensity, gas	g/kWh	0.02	0.01 <sup>1</sup>	0.02 <sup>1</sup>

1 Values have changed compared to the data published in 2024 due to changes in scope and accounting systems.

### Accounting principles

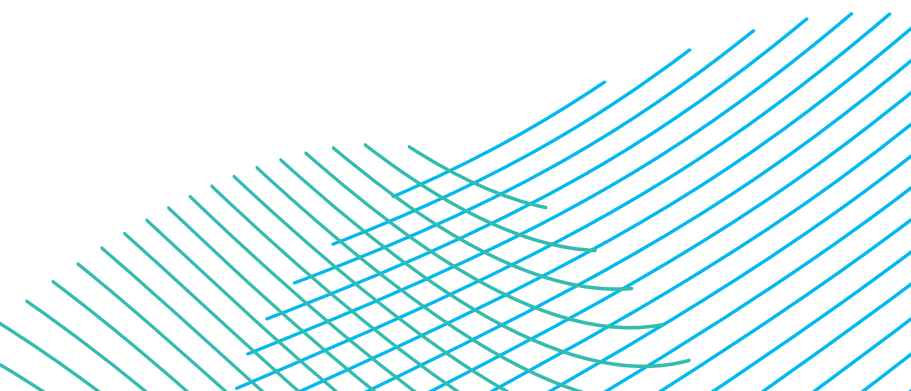
- Nitrogen oxides and sulphur dioxide emissions are only reported for our fossil-fuel power plants. These emissions are primarily determined through continuous measurement but may also be estimated using plant-specific emission factors.
- **Dust emissions:** since 2022 this also includes emissions from opencast mines.



# 03

## Social

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## Diversity, equity and inclusion

### The challenge

RWE, like many major international companies, recognises the importance of diversity, equity and inclusion in fostering innovation, creativity and improved financial performance. However, we still encounter challenges in achieving a workforce that fully represents the regions in which we operate. While RWE's global operations provide employees with varied work experiences and growth opportunities, reflecting our multinational workforce, our ongoing challenge is to further enhance fair access to opportunities and improve representation at all levels.

### Our ambitions

We see a range of talent and skills as a key strength that drives growth and success across our operations. Our commitment is to cultivate an inclusive work environment, one where discrimination is actively rejected and personal development is championed. In relevant jurisdictions, RWE has set the goal of achieving greater gender balance in leadership: by 2030, 30% of management positions in the Group's core business should be held by women. This ambition does not include the phaseout technologies (coal and nuclear) due to personnel reductions in that sector.

### Our approach

Diversity, equity and inclusion are embedded in the principles included in our Code of Conduct, our Diversity, Equity and Inclusion Statement, our Anti-Discrimination Policy and our Essential Behaviours.

The Group-wide Diversity and Inclusion team develops overall strategies and targets to ensure global consistency. However, as a global company we operate in many jurisdictions and cultures. Therefore, each operational company also has a Diversity Lead and responsible Board Member. In this way we act informed by local legislation and with insight and respect for cultural uniqueness, reinforcing our strength as a global energy leader for renewable energy. We prioritise our inclusion-first culture to create a workplace where everyone can thrive. We focus on implementing systemic improvements that reduce bias, broaden our talent pool, support innovation and enhance robust decision making.

### Progress

- In 2024, RWE continued to advance its inclusive culture across the Group, highlighted by a sustained increase in the number of women in management positions. We expanded our global web-based DE&I training, offering practical guidance that empowers employees to contribute actively to our inclusive culture every day. This initiative lays the foundation for essential skills that nurture RWE's inclusive environment.
- Our diversity networks experienced remarkable growth, with memberships in the LGBT\*IQ&Friends Network and Women's Network increasing to 500 and 1,600 members, respectively. Additionally, our global Empower Network, focusing on Disability and Neurodiversity, grew by 167%.

The Diversity Ambassadors network, open to all, more than doubled its membership, highlighting its vital role in promoting a thriving, inclusive culture for everyone. Parental leave coaching was further rolled out across the organisation, providing support for employees in navigating critical transitions and balancing personal and professional aspirations.

- Aligned with meeting the specific needs of the operational companies, specific initiatives were also implemented. RWE Offshore launched the 'Power Looks Good on You' campaign, and RWE Supply and Trading introduced the 'Rise' initiative, both tailored to empower employees in their respective sectors. We celebrated International Women's Day through the Global Women's Network's annual conference and hosted the 'her.Summit' at the RWE campus in Essen, reinforcing our commitment to gender equality. Efforts to improve transparency and education continued, with updated webpages that better showcase our DE&I initiatives, enhanced reporting mechanisms and engaging content for Black History Month and Disability Pride Month.

### Indicators

We report on the gender distribution in our company, including leading indicators, to key stakeholders such as the Supervisory Board, Executive Board and upper management, in line with the German Codetermination Act. We transparently share our information on [www.rwe.com](http://www.rwe.com).

## Community engagement

### The challenge

With the energy transition, RWE is at the forefront of a significant transformation, shifting infrastructure from combustion power plants to renewable assets in different countries. This transition and work in diverse global regions poses various challenges for our engagement with different stakeholders, and the success of this transition is dependent on a supportive framework. Despite professional relationship management with the communities in which we operate and comprehensive mitigation and support measures, there is still a potential impact from our activities. Therefore, it is important for us to be open, honest and proactive with all affected stakeholders

### Our ambitions

RWE aims to implement effective mitigation measures and where possible to create positive, lasting impacts in the communities in which we operate with the long-term goal of generating shared value. It is crucial for us that all projects strive to achieve strong community relations and positive long-term impacts. Therefore, community engagement has been an integral part of our business for many years.

In addition to our community engagement approach, we have also established the RWE Foundation. Through this Foundation, we want to use our energy to foster lasting change in the social sphere as well, so that we can help make a positive difference in society over the long term, in Germany and abroad with a focus on helping young people to improve their future prospects.

We are also committed to strict political neutrality and do not make donations to parties, organisations or foundations that have close ties to political parties.

### Our approach

Our focus is on addressing the changes that impact both our business segments and the communities affected by the energy transition. For decades, RWE has actively engaged with numerous stakeholders, ensuring that their interests inform our objectives and plans throughout the entire lifecycle of our assets – from project development to construction, operation, decommissioning, demolition and site reuse. Our active engagement with municipalities also involves significant financial resources, such as 0.2 ct/kWh in line with German Renewable Energy Sources Act, along with municipal participation models, to name just a couple of examples. With this, we enable communities to participate in our success and foster public acceptance of our activities.

We have developed a community engagement policy which serves as a guiding compass, outlining our principles and goals. The policy is designed to ensure that our initiatives deliver real value in harmony with the unique needs of the communities we serve. We have created an internal framework that incorporates best practices in community engagement based on our own experience and industry insights. This framework acts as a roadmap, providing our teams with the tools and knowledge needed to foster

meaningful, productive relationships with the communities in which we operate.

### Progress

- In the US market, RWE has continued to grow its community engagement team that is dedicated to helping the company improve community relations. Community engagement activities are now integrated into project development plans with priority for research, planning and execution. In 2024, the US community engagement team completed 92 social risk and community assessments, implemented 40 unique community engagement plans, and participated in 98 community events.
- In 2024, the RWE Foundation funded 29 projects with a total volume of around €2 million, facilitating more equal opportunities for children and young people across Europe. For more information please visit the [RWE Foundation](#) website.

### Indicators

We report on specific measures including our volunteering activities and our engagement with communities. Please see the Social KPI table on page 14.

## Employment, training and skills development

### The challenge

Today's job market is a challenging environment when it comes to attracting and retaining employees. As RWE continues on a journey of transformation, it is vital to strike a balance between recruiting specialised talent for our expanding renewables business and managing a socially responsible transition with regard to our phaseout technologies. Our success hinges on the knowledge and skills of our employees, whose competence and commitment are essential.

### Our ambitions

At RWE, our ambition is to be recognised as an employer of choice, attracting and retaining talent while nurturing the professional growth of our workforce. We are committed to creating a work environment that empowers employees to realise their full potential and contribute to a sustainable energy future. With continuous learning, skill enhancement and talent mobility, we strive to facilitate career development across the Group.

### Our approach

To achieve these ambitions, RWE applies a comprehensive set of measures for talent attraction, career development and employee support. By providing competitive working conditions, modern workspaces and ample career opportunities, RWE has developed its image as an attractive employer in the energy sector.

Continuous learning is integral to our strategy, including a wide array of training programmes that enhance technical skills, leadership abilities, IT competencies and project management expertise. These programmes are accessible in various formats, including in-person training, blended learning, online courses and video-based instruction. We emphasise the dual education system, combining practical training at RWE with formal instruction at vocational schools, to ensure high-quality learning experiences that benefit both the company and the industry.

To bolster career development, RWE offers specialised talent programmes for employees aspiring to advance in expertise, project management or leadership roles. These initiatives support internal mobility and facilitate the exploration of new opportunities within the Group. Our HR teams actively curate learning, development and change processes to support employees throughout their careers.

For those affected by the phaseout technologies, RWE has launched comprehensive programmes, providing responsible solutions to facilitate transitions and prioritising internal redeployment opportunities via our own job market or offering attractive alternative solutions. If suitable positions within the Group are unavailable, alternative solutions are considered, such as early retirement programmes.

### Progress

- In 2024, RWE advanced the company-wide integration of RWE's Essential Behaviours across the organisation. The emphasis was on creating impact, courage and active collaboration. RWE supports employees with workshops, communication campaigns and HR tools to reinforce these behaviours throughout the employee lifecycle. Additionally, the talent development strategy focuses on leadership aligned with corporate strategies to nurture leadership potential.
- We also made significant progress in training and development. Over 140,000 training courses were booked through our HR portal in 2024, demonstrating a strong commitment to employee growth and skill enhancement. Employer branding remained a key focus, with continued efforts to reinforce our positioning through HR toolkits and recruitment strategies that align with our corporate values and sustainability goals.

### Indicators

RWE tracks and reports human resources indicators, including recruitment success rates, training participation levels, and internal employee mobility. Please see the Social KPI table on page 15. For more detailed information on the topic of own workforce including health and safety KPIs, please see chapter 'S1 Own workforce' in the Group Sustainability Statement in the [RWE Annual Report 2024](#).

## Social KPIs

### Community engagement

Metric	Unit	2024	2023	2022
Donations by the Group	€ million	2.1	1.7	5.9
Sponsorships by the Group	€ million	2.4	3.8	1.1
Contributions to Community Funds in the United Kingdom	£ million	6.1	>5	>5
Grants by Community Funds in the United Kingdom	number	703	578	488

#### Accounting principles

- **Donations made by the Group:** data includes grants made by Community Funds.

## Employment, training and skills development

Metric	Unit	2024	2023	2022
Employees	FTE	20,984	20,135	18,310
Employees	number	22,098	21,233	19,406
of which: full-time employees	number	20,569	19,779	18,100
of which: part-time employees	number	1,529	1,454	1,306
of which: male	%	79.2	80.5	82.5
of which: female	%	20.8	19.5	17.5
Tariff / payscale employees	%	49.7	51.5	57.1
Non-tariff / non-payscale employees	%	41.9	40.1	33.8
Share of executive employees	%	3.8	3.8	3.8
External hirings	FTE	2,352	3,508	1,847
of which: male	FTE	1,673	2,596	1,326
of which: female	FTE	678	912	521
Apprentices in the Group	number	707	707	742
of which: Germany	number	639	644	686
Share of apprentices in the Group	%	3.2	3.5	3.8
of which: Germany	%	4.4	4.8	5.3
Apprentices p.a.	approx. number	234	200	180
Average training time per employee	hours	4.6	—	—
Training sessions booked	number	139,141	140,708	111,631
Proportion of employees undergoing training (including compliance)	%	100	100	100

### Accounting principles

- **Employees:** this figure can be measured as headcount or measured in full-time equivalents (FTE).
- **Average training time per employee:** the calculation method for this KPI was updated with a new survey methodology in 2024. Therefore, the value is no longer comparable with the previous year's values.

## Employment, training and skills development

Metric	Unit	2024	2023	2022
Number of severely disabled persons, Germany	number	785	880	1,002
Disability ratio, Germany	%	5.4	6.1	7.2
Average age	years	43.0	43.5	44.4
Employees < 20 years	%	1.4	1.3	1.4
Employees 20 – 29 years	%	15.1	14.8	13.1
Employees 30 – 39 years	%	26.6	25.3	23.0
Employees 40 – 49 years	%	23.9	22.9	22.5
Employees 50 – 59 years	%	25.9	28.8	32.5
Employees ≥ 60 years	%	7.1	7.0	7.5
Lost Time Incidents (LTI), own employees	number	49	37	36
Lost Time Incidents (LTI), own employees and contract workers	number	113	94	83
Sickness rate	%	4.6	4.9	5.7
Externally certified management systems for occupational safety	%	50	49	58

### Accounting principles

- Disability ratio:** share of workers with disabilities. We report this metric for Germany only. It takes into account severely disabled employees according to the German SchwBG or equivalent (GdB of min. 50 or min. 30).
- LTI:** number of lost time incidents resulting in at least one day of absence.
- Sickness rate:** percentage of work time that an employee is absent due to sickness, accidents or treatment. It is calculated by looking at the number of working hours missed out of a certain period of total working hours, according to country-specific regulations.



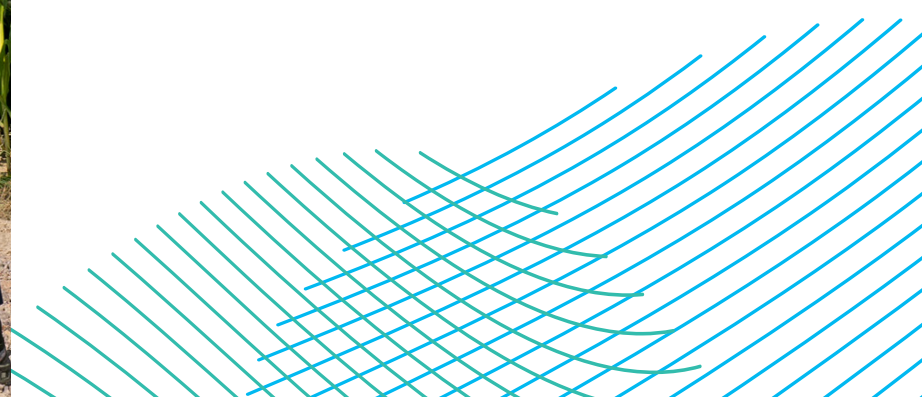


# 04

## Governance

(Cyber) Security  
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## (Cyber) Security

### The challenge

The electricity supply industry is deemed to be critical infrastructure that is crucial for society's well-being. As a result of this, RWE is affected by growing legal requirements. These requirements cover cybersecurity as well as physical security and related areas such as resilience, business continuity management and crisis and emergency management.

Digital technologies and cloud solutions have modernised and interconnected our power stations. These new solutions can also involve new risks, such as vulnerability to cyberattacks. Disruptions in any of the crucial parts of our business could impact energy supply. This again could be a threat for daily life and the safety and health of individuals.

### Our ambitions

RWE ensures the reliable operations of our power plants and a high degree of resilience of our internal systems against crises. Beyond simply meeting the legal requirements, we identify and protect our key business processes, facilities and information. By following strict security measures, we want to ensure stable electricity production. Our overarching goal is to prevent cybersecurity incidents before they occur and to safeguard our assets.

### Our approach

At RWE, cybersecurity is a fundamental element of our operational strategy, extending across all Group companies. We emphasise planning and training to effectively handle a wide array of potential events, including highly improbable but impactful cyber incidents. Our security services monitor, detect, and respond to threats in both Information Technology (IT) and Operational Technology (OT). The cybersecurity enterprise programme integrates IT and OT cybersecurity, providing centralised governance, global threat monitoring and incident response management. This programme safeguards RWE's operations and objectives from cyber threats, managing risks related to information security and IT systems under the oversight of our Group Cyber Security department.

Our approach includes protecting business assets against worldwide threats through cybersecurity management and secure IT integration. We employ security-by-design principles, managing user access rights and enterprise security architecture to fortify our security landscape. Group Cyber Security promotes employee awareness through various campaigns, evaluates Group-wide risks and coordinates critical incident management. Our Cyber Security Incident Response team and IT Security Operations Centre handle cybersecurity incidents with a holistic approach, addressing all potential critical disruptions.

To be prepared for attacks, whether they are physical or via the internet, and to be able to respond to them promptly, we continuously analyse and evaluate the threat situation.

The RWE Group Security Department identifies security risks, sets protection standards and ensures business operations remain secure by focusing on site security, employee safety and travel protection. With the expansion of our international operations, we are enhancing resilience and promoting a strong security culture across the entire Group. We regularly update our security measures and develop detailed emergency plans to handle disruptions. Our risk management approach is continuously improved to adapt to new challenges.

### Progress

- In 2024, RWE's resilience was strengthened with the revision and adaption of the Business Continuity and Crisis Management approaches and setups.
- Cybersecurity measures were reinforced by way of risk-based updates, advanced security technology integration and broadened awareness initiatives.

# Data protection

## The challenge

Data protection is not only a legal obligation but is also becoming increasingly important in today's digitally interconnected world. Stories about data breaches and lack of protection of personal data can be found in the media. While awareness of the need for effective data protection is constantly rising, there is also a growing economic interest in this type of data.

## Our ambitions

RWE takes data protection seriously. Our employees and external stakeholders should always feel secure and confident when their data is processed. We want to protect personal data from misuse, thereby building and strengthening the trust of our employees, partners and other stakeholders. Achieving security objectives such as availability and resilience is essential and is demonstrated and validated by the respective process owners.

## Our approach

To ensure compliance, we have implemented a comprehensive data protection management system across the Group, aligned with the RWE Code of Conduct and our sustainability principles. These frameworks and guiding principles facilitate legally compliant processing of personal data, both internally and externally on our behalf.

Protecting the integrity and confidentiality of personal data of our business partners, employees and customers is important to us. Data protection is integrated into processes involving personal data ('data protection by design' and 'data protection by default'). Employees have responsibility for adhering to data protection requirements and are encouraged to reach out to the data protection officer or the data protection coordinators in departments and units if there are questions.

Group Data Protection consistently promotes awareness and training among employees and management regarding data protection requirements. Key focus areas of the Data Protection Management System include raising awareness, consulting projects and processes, safeguarding individuals' rights and handling data protection incidents. The Group Data Protection Officer regularly provides updates on pertinent data protection matters to the Executive Board of RWE AG.

The Executive Boards of each operating company oversee compliance with data protection regulations, appointing representatives from the Executive or Management Boards to handle data protection as an area of responsibility. Depending on the data categories or specific tasks, responsibility for processing activities involving personal data may be delegated to subordinate bodies or officers.

## Progress

- The data protection management system was successfully maintained and further developed, including the deployment and testing of AI applications to increase operational efficiency. New frameworks for assessing the data protection compliance of AI solutions were established. The ongoing revision of internal standards and processes aligns with the official statements of the authorities, court rulings and best practices in the industry.
- As part of continuously improving the training programme, additional awareness measures were implemented. A newly designed, mandatory web-based training course was launched and customised training programmes were developed for particularly data sensitive areas.
- In structural terms, the global data protection organisation was further professionalised by increasing the depth of integration, in particular by standardising processes and introducing new indicators and exchange formats.

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