

A photograph of two RWE workers, a man and a woman, wearing white hard hats and high-visibility orange and blue work clothes. They are looking upwards and to the right, holding and reviewing a set of blueprints. The background shows an industrial construction site with metal scaffolding and a perforated metal floor. The RWE logo is visible on their hard hats and work clothes.

RWE

Creating value.
Respecting values.

Supplementary
Sustainability Report 2025

Contents

01 Introduction	03
About this report	04
02 Environment	05
Water	06
Pollution control and air quality	07
Environmental KPIs	08
03 Social	10
Diversity, equity and inclusion	11
Community engagement	12
Employment, training and skills development	13
Social KPIs	14
04 Governance	17
(Cyber) Security	18
Data protection	19



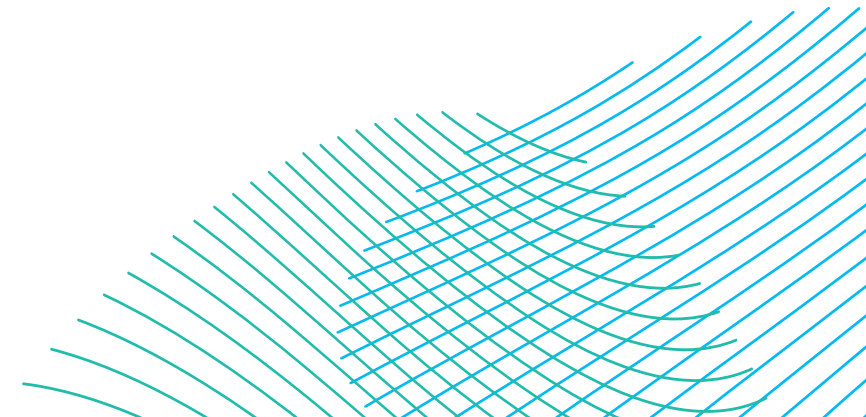


01

Introduction

About this report

04



About this report

In 2024, RWE adopted the European Sustainability Reporting Standards (ESRS) in line with the Corporate Sustainability Reporting Directive (CSRD), establishing a robust framework for our sustainability reporting. Building on this foundation, our Group Sustainability Statement in the Annual Report 2025 is the second RWE sustainability statement to be prepared in full alignment with ESRS and provides comprehensive disclosures based on the double materiality assessment (DMA). This includes a description of our sustainability strategy, overarching approaches, key actions, targets and metrics.

For details, please see the Group Sustainability Statement in the [RWE Annual Report 2025](#).

This Supplementary Sustainability Report covers additional aspects not 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, with the sub-topics of climate change mitigation, climate change 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, 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 Sustainability Report complements the core disclosures on the material sustainability topics in the Annual Report 2025 with additional sustainability topics.

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 and advance social responsibility.

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

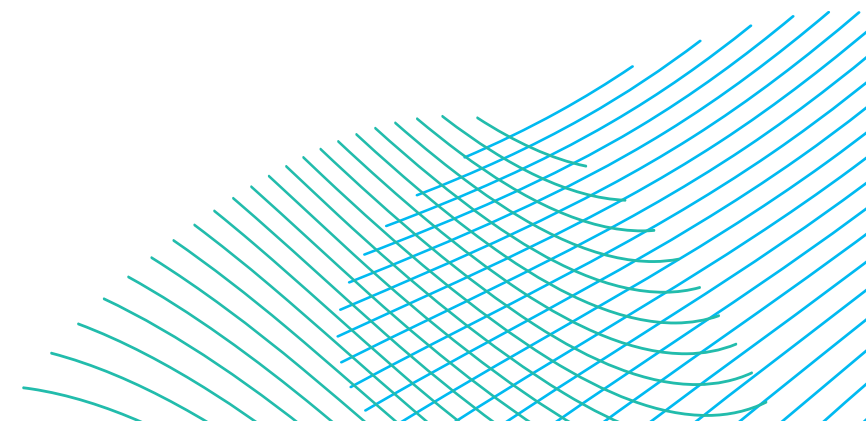
We hope that this report serves as a valuable resource for our stakeholders.



02

Environment

Water	06
Pollution control and air quality	07
Environmental KPIs	08



Water

The challenge

As part of its operations - particularly for cooling processes - RWE relies on a stable water supply to support a range of power generation technologies. Ensuring secure access to water is essential not only for RWE's operations, but also for local communities and the regional economy. At the same time, RWE places importance on protecting wetlands, particularly in areas that are vulnerable to drying out or exposed to elevated levels of water stress.

Our ambitions

We strive to reduce our total water consumption per megawatt-hour of electricity produced by 40% by 2030, compared to the baseline year 2022. This intensity target refers to our specific water consumption, calculated as the difference between water withdrawal and water discharge, divided by the electricity generated. Our ambitions include conserving water and regularly monitoring our operations to protect the environment as best as we can while ensuring compliance with all relevant legal requirements and permit obligations.

Our approach

Through technological precautions, routine evaluations and effective wastewater treatment, we proactively ensure that surface waters and groundwater remain uncontaminated. Environmental impacts on rivers and groundwater are assessed against current licenses, limits, expert benchmarks, and operational results from previous years. The findings are evaluated by our internal experts

and a consortium of governmental bodies, associations and accredited external specialists. Aspects and responsibilities related to water management are integrated into our environmental management system, alongside other environmental topics and are anchored in our Environmental Protection Group Directive. Since this Directive applies to all RWE AG affiliated companies included in the consolidated financial statements, RWE has achieved 100% coverage with its environmental management system.

In Germany, the Netherlands and the United Kingdom, water extraction varies by power plant technology: gas-fired plants utilise mainly channels, rivers, brackish water, seawater and groundwater; our Eemshaven hard coal and biomass fired power plant draws from the sea; 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.

To use water resources efficiently at relevant locations, including those in water-stressed areas, we apply measures such as recirculating cooling water in power plants, utilising collected rainwater and reusing process water. In water-stressed areas, most of our water withdrawals are related to power plant cooling, with the majority of the water subsequently returned to water bodies. Overall, we discharge approximately 98% of the clean water back into surface waters.

Progress

- In 2025, we maintained our CDP Water Security rating with an overall B score. CDP scores organisations based on the steps they take on the path to greater environmental stewardship. With an overall B score, RWE continues to be among the leading companies in its field.
- In 2025 we were able to reduce our specific water consumption by 29%, compared to the 2022 base year.
- The approval procedure to construct a 45-kilometer pipeline (Rheinwassertransportleitung) from the Rhine near Dormagen to the Garzweiler and Hambach opencast mines, which began in 2024, continued as planned in 2025 and we received the permit to begin construction of the pipeline. 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 of 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, water consumption and water stress, 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 (SO₂), nitrogen oxides (NOx) and dust (particulate matter). These emissions can impact people or the environment and are subject to increasingly stringent regulations.

Our ambitions

While we comply with legislative and permit-related thresholds to protect people and the environment, our goal is to further reduce emissions from our plants and to advance research focused on minimising future emissions. We aim to reduce our Group-wide NOx emissions per megawatt-hour produced by 35% and SO₂ emissions per megawatt-hour produced by 70% by 2030, compared to the 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 people and the environment. We maintain robust monitoring facilities and engage in active communication with regulatory authorities at our sites. Sulphur dioxide (SO₂) and nitrogen oxides (NOx) are the primary pollutants of conventional generation units.

Conventional combustion plants contribute to secondary particulate matter formation through atmospheric reactions involving NOx and SO₂. Units firing hard coal and lignite, as well as biomass, also emit fine particles directly, resulting in primary particulate emissions. Dust primarily originates from the operation of our opencast mining facilities and construction activities, potentially affecting local air quality. RWE employs extensive air purification and dust control techniques to effectively reduce our impact.

Except for our gas fired power plant in Turkey, all of our conventional power plant portfolio operates in Germany, the United Kingdom and in the Netherlands. 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, in full accordance with legal requirements and permitting regulations.

Progress

- In 2025, we reduced NOx emissions per megawatt-hour produced by 25% and SO₂ emissions per megawatt-hour produced by 32%, compared to the 2022 base year.
- We successfully complied with all relevant thresholds in 2025.

Indicators

We report metrics related to sulphur dioxide (SO₂), nitrogen oxides (NOx) and dust. Please see the Environmental KPI table on page 9.

Environmental KPIs

Water consumption

Metric	Unit	2025	2024	2023
Total volume of water withdrawal	million m ³	4,325	4,225	4,662
of which: surface water	million m ³	1,470	1,293	1,446
of which: groundwater	million m ³	447	460	483
of which: water from third parties	million m ³	3	3	4
of which: seawater / brackish water	million m ³	2,405	2,470	2,729
Total volume of water discharge	million m ³	4,238	4,129	4,505
of which: surface water	million m ³	1,797	1,632	1,739
of which: water to third parties	million m ³	35	27	36
of which: seawater / brackish water	million m ³	2,406	2,470	2,730
Total water consumption¹	million m ³	87	96	157
Specific water consumption	m ³ /MWh	0.71	0.81	1.21

1 Total water consumption is calculated as the difference between total volume of water withdrawal and total volume of water discharge.

Accounting principles

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

Pollution control and air quality

Metric	Unit	2025	2024	2023
NOx emissions	thousand metric tons	27.48	29.59	33.68
SO ₂ emissions	thousand metric tons	7.45	8.21	9.33
Dust emissions	metric tons	1,291.70	1,540.46	1,666.76
NOx emission intensity	g/kWh	0.22	0.25	0.26
SO ₂ emission intensity	g/kWh	0.06	0.07	0.07
Dust emission intensity	g/kWh	0.01	0.01	0.01
NOx emission intensity, lignite	g/kWh	0.74	0.75	0.75
NOx emission intensity, hard coal	g/kWh	0.28 ¹	0.41	0.38
NOx emission intensity, gas ²	g/kWh	0.12	0.12	0.14
SO ₂ emission intensity, lignite	g/kWh	0.24	0.24	0.26
SO ₂ emission intensity, hard coal	g/kWh	0.15	0.16	0.13
SO ₂ emission intensity, gas ²	g/kWh	0.0004	0.0004	0.0005

1 The value decreased due to the Amer hard coal plant being fully converted to biomass as of 31 December 2024.

2 Values for 2024 and 2023 have been corrected compared to the reporting in the previous years due to identified instances of double counting.

Accounting principles

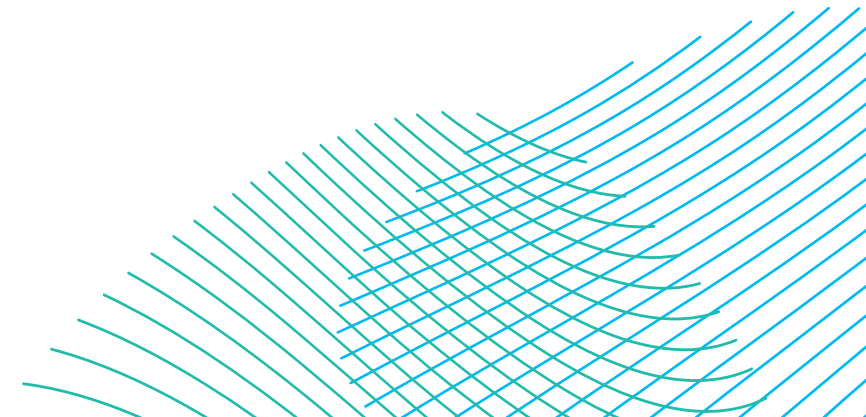
- Nitrogen oxides and sulphur dioxide emissions are only reported for our fossil-fuel power plants. These emissions are primarily determined through continuous measurement but may also be estimated using plant-specific emission factors.



03

Social

Diversity, equity and inclusion	11
Community engagement	12
Employment, training and skills development	13
Social KPIs	14



Diversity, equity and inclusion

The challenge

RWE recognises the importance of diversity, equity and inclusion in fostering innovation, creativity and improved financial performance. In the face of a challenging and evolving environment, we continue to work towards ensuring that our workforce mirrors the diversity of the regions where we operate. Across RWE's global operations, we provide employees with varied work experiences and development opportunities, reflecting our multinational presence. However, we recognise the need to further broaden access to these opportunities, leading to improved representation at all levels.

Our ambitions

We see a range of talent, skills and individual perspectives as key strengths that drive 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, enabling all employees to reach their potential. 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 phaseout technologies (coal and nuclear) due to personnel reductions in that sector, or positions based in the US.

Our approach

Diversity, equity and inclusion are embedded in our values and reflected in our Code of Conduct, Diversity,

Equity and Inclusion Statement, Anti-Discrimination Policy, Essential Behaviours and Leadership Principles. The Group-wide Diversity and Inclusion team develops overarching strategies to ensure a consistent global approach. As a global company with a diverse portfolio operating across multiple regions and technologies, we recognise the unique needs related to different locations and business areas. Therefore, each operating company also has a Diversity Lead and a responsible Board Member, enabling us to act not only in compliance with local legislation and cultural contexts but also to address challenges specific to the operating companies. Our inclusive culture remains our priority, creating a workplace where everyone can thrive. In addition, we focus on implementing systemic improvements that reduce bias, broaden our talent pool, support innovation and enhance robust decision-making.

Progress

- In 2025, RWE continued to strengthen its inclusive culture and achieved consistent progress in the representation of women in management positions.
- Our diversity networks experienced sustained growth, with increasing membership in the LGBT*IQ & Friends Network, the Women's Network and the Empower Network (focused on disability and neurodiversity). The rebranded 'Including You' network, open to all colleagues, expanded its membership and outreach activities, reflecting growing engagement across our organisation.

- Systemic change was further advanced by embedding diversity, equity and inclusion principles and debiasing best practices into our Leadership Principles and the Executive Journey. This ongoing integration reinforces systemic changes that increase fairness in the moments that matter.
- The 'Power of All Voices' campaign, launched by RWE Supply & Trading (RWEST), amplified diverse perspectives, encouraged employee participation and emphasised how an inclusive culture benefits both employees and RWE.
- We expanded practical, global tools and resources supporting inclusive behaviour in employees' everyday work, making inclusive behaviours a clear responsibility for all employees across the Group.
- Our ongoing achievements received external recognition, including securing 2nd place in the Women's Career Index (FKI), highlighting our continued advancement towards an inclusive culture and gender balance in leadership roles.

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 this information on [rwe.com](https://www.rwe.com).

Community engagement

The challenge

With the energy transition, RWE is at the forefront of a transformation, shifting infrastructure to renewable and flexible assets in different countries. This transition and work in diverse global regions pose various opportunities and challenges for our engagement with different stakeholders. 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 an 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 is an integral part of our business.

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.

Our approach

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. In the UK, RWE has been supporting community development for over 25 years through our community fund programme, helping to foster growth, resilience, and sustainability within local communities, with funding decisions taken by local people. Our active engagement with German municipalities also involves significant financial resources: RWE pays the surrounding municipalities 0.2 euro cents per kilowatt hour produced from its wind and solar farms in line with the German Renewable Energy Sources Act, along with municipal participation models, to name just a couple of examples.

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 and productive relationships with the communities in which we operate.

Progress

- In the US market, RWE has continued to grow its community engagement activities, helping the company improve community relations. Community engagement activities are integrated into project development plans with priority given to research, planning and execution. In 2025, the US community engagement team completed 100 social risk and community assessments, implemented 50 unique community engagement plans and participated in 200 community events.
- To date in the UK renewable energy projects operated by RWE have contributed over £50.3 million to local communities. This includes more than £5 million in 2025 alone which helped to unlock a further £5 million in match funding. For more information, please visit: rwe.com/in-your-community.
- In 2025, the RWE Foundation funded 53 projects with a total volume of around €10.4 million approved, facilitating more equal opportunities for children and young people across Europe. For more information, please visit the RWE Foundation website: rwe-foundation.com.

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 and flexible generation 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 in Germany, 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 or qualification programmes.

Progress

- In 2025, a key development focus has been the strategic upskilling of all employees in artificial intelligence (AI). To enable responsible, scalable and efficient AI adoption, RWE has implemented an enablement programme. The holistic training and transformation approach offers employees various training workshops and covers three major pillars: leadership and trust, awareness and enablement, and mindset and behaviour. The portfolio includes more than 15 major events, such as the Group-wide Promptathon and AI Day, as well as over 50 individual team AI experience sessions. Additionally, it encompasses the identification of relevant AI use cases. In this way, RWE is strengthening employee competence, building confidence, and accelerating the productive use of AI.
- In 2025, over 178,000 training courses were booked through our SuccessFactors learning platform, 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.

Indicators

Please see the Social KPI table on page 15. For more information on our own workforce including health and safety KPIs, please see chapter 'S1 Own workforce' in the [RWE Annual Report 2025](#).

Social KPIs

Community engagement

Metric	Unit	2025	2024	2023
Donations by the Group	€ million	1.7	2.1	1.7
Sponsorships by the Group	€ million	3.8	2.4	3.8
Contributions to Community Funds in the United Kingdom	£ million	5.7	6.1	>5
Grants by Community Funds in the United Kingdom	number	741	703	578

Accounting principles

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

Employment, training and skills development

Metric	Unit	2025	2024	2023
Employees	FTE	20,120	20,985	20,135
Employees	HC	21,265	22,098	21,233
of which: full-time employees	HC	19,758	20,569	19,779
of which: part-time employees	HC	1,507	1,529	1,454
of which: male	%	79.1	79.2	80.5
of which: female	%	20.9	20.8	19.5
Tariff / payscale employees	%	49.1	49.7	51.5
Non-tariff / non-payscale employees	%	42.3	41.9	40.1
Share of executive employees	%	4.0	3.8	3.8
External hirings ¹	HC	1,153	2,352	3,508
of which: male	HC	934	1,673	2,596
of which: female	HC	219	678	912
Apprentices in the Group	HC	738	707	707
of which: Germany	HC	652	639	644
Share of apprentices in the Group	%	3.5	3.2	3.5
of which: Germany	%	4.7	4.4	4.8
Apprentices p. a.	approx. HC	245	234	200
Average training time per employee	hours	5.9	4.6	—
Training sessions booked	number	178,747	139,141	140,708
Proportion of employees undergoing training (including compliance)	%	100	100	100

1 In fiscal 2025, the FTE calculation was replaced by headcount (HC). Therefore, the reduced working hours of part-time employees are no longer considered.

Accounting principles

- **Employees:** this figure can be measured as headcount (HC) 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	2025	2024	2023
Severely disabled persons, Germany	HC	678	785	880
Disability ratio, Germany	%	4.9	5.4	6.1
Average age	years	42.9	43.0	43.5
Employees < 20 years	%	1.6	1.4	1.3
Employees 20 – 29 years	%	14.2	15.1	14.8
Employees 30 – 39 years	%	27.1	26.6	25.3
Employees 40 – 49 years	%	25.4	23.9	22.9
Employees 50 – 59 years	%	24.5	25.9	28.8
Employees ≥ 60 years	%	7.2	7.1	7.0
Lost Time Incidents (LTI), own employees	number	32	49	37
Lost Time Incidents (LTI), own employees and contract workers	number	87	113	94
Sickness rate	%	4.4	4.6	4.9
Externally certified management systems for occupational safety	%	49	50	49

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.

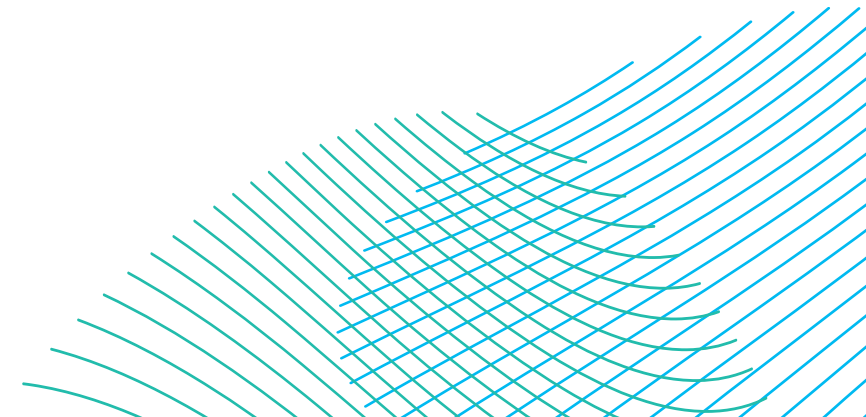


04

Governance

(Cyber) Security
Data protection

18
19



(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, RWE is affected by growing legal requirements, such as the EU Critical Entities Resilience Directive and NIS2, as well as by the evolving geopolitical situation. These requirements cover cybersecurity, 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 entire generation portfolio. These new solutions, as well as new technologies and AI, 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, in turn, could pose a threat to daily life and the safety and health of individuals.

Our ambitions

We ensure the reliable operation of facilities and maintain a high degree of resilience in internal systems against crises. We identify and protect our key business processes, facilities and information. By following strict security measures, we aim to ensure stable electricity production. Our overarching goal is to proactively prevent security and cyber incidents and to ensure the protection of our people, information, operations and assets.

Our approach

To ensure preparedness for both physical and cyber attacks, and to enable a prompt response, we continuously analyse and assess the threat landscape. 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 Cybersecurity department.

Our approach includes protecting business assets against worldwide threats through cybersecurity management and secure IT integration. We employ security-by-design principles, manage user access rights and maintain an enterprise security architecture to fortify our security landscape. Group Cybersecurity 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.

The RWE Group Security department identifies security risks, sets Group-wide protection standards and strengthens RWE's business resilience by providing frameworks for crisis management, business continuity management and employee security, and by monitoring the implementation of these minimum requirements. With the expansion of our international operations, we continue to promote a strong security culture across the entire Group. We regularly update our security measures and maintain detailed crisis and continuity plans to support effective responses to potential disruptions. Our risk management approach is continuously improved to adapt to new challenges.

Progress

- In 2025, strengthening RWE's resilience approach continued through enhancements to the Group-wide Business Continuity Management and alignment of crisis management structures with evolving requirements.
- Cybersecurity measures were reinforced through risk-based updates, the continuous integration of advanced security technologies and broadened cybersecurity awareness initiatives.

Data protection

The challenge

Data protection is not only a legal obligation for RWE – it is also a growing priority in today’s digitally interconnected world. Recent media coverage of data breaches and the misuse of personal information underscores the importance of robust measures for the protection of personal data. As awareness of the need for effective data protection continues to increase, so too does the economic value associated with personal data. At the same time, the rapid advancement of new technologies – including artificial intelligence and robotics – introduces additional complexity that requires proactive and forward-looking data protection governance.

Our ambitions

It is our priority to ensure that employees and external stakeholders feel secure and confident whenever their data is processed. By safeguarding personal data against misuse, we build and strengthen the trust of our employees, partners and other stakeholders. Achieving key security objectives - including data availability and resilience - remains fundamental to our approach. Our data protection organisation is both customer-centric and innovation-driven, continuously enhancing its services to meet the evolving needs of our internal clients. By staying current with the latest regulatory and technological developments, RWE ensures data protection while also supporting our commitment to operational excellence and trust.

Our approach

To ensure compliance, we have implemented a comprehensive Data Protection Management System (DPMS) across the Group, aligned with the RWE Code of Conduct and our sustainability principles. These frameworks and guiding principles facilitate the legally compliant processing of personal data, both within our organisation and by external partners acting on our behalf, and are continuously monitored and updated to reflect the dynamic regulatory landscape.

Data protection is integrated into processes involving personal data (‘data protection by design’ and ‘data protection by default’). Employees are responsible 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 they have questions.

Group Data Protection consistently promotes awareness and training among employees and management regarding data protection requirements. Key focus areas of the DPMS include raising awareness, consulting on 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 and other boards of the RWE Group operating companies.

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. 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 DPMS was successfully maintained and further developed. New frameworks for assessing the data protection compliance of AI solutions were established. The ongoing revision of internal standards and processes aligns with official statements of supervisory authorities, court rulings and industry best practices. In parallel, the use of AI-powered tools to support operational processes within the DPMS was systematically expanded, and the accelerating integration of platforms and services has been proactively supported, with new software solutions successfully implemented and internal processes further streamlined.
- In 2025, RWE advanced its capabilities by introducing dedicated AI & Data Law advisory services, ensuring ongoing alignment with fast-changing legal and regulatory requirements. The team enhanced its global professionalism by standardising processes, introducing new performance indicators and expanding cross-functional and international collaboration alongside the Group-wide update of Records of Processing Activities.

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