

The Group Directive was issued in [German] and translated into [English].

Gender-neutral terms always refer to individuals of any gender. This Directive applies to persons of all genders equally.

Instruction / Communication				
Activity	OU	Name	Date	Approval
Creation/ Change	H&S Management & Expertise (PHH-M)		07.03.2024	by E-Mail
Functional re- lease	Health & Safety (PHH)		11.03.2024	by E-Mail
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## 1 Modifications

Date	Modification (latest 10 modifications)	Author (First name, surname, OU)
14/10/2019	Complete revision: Editorial revision of the Directive and addition of specifications and definitions for Group reporting and the CR report (Section 5.5 and Annex 3)	
23/03/2020	Wording for unbundling updated	
25/08/2020	Adaptation of integrated sustainability principles	
23/11/2020	Update of Annex 1	
23/11/2020	Update of unbundling clause, Chapter 3	
16/02/2021	Update of Annex 3, Integrated sustainability principles	
01/01/2021	Amendment to reporting in the course of integrated compliance reporting (Ch. 5) Responsible Executive Board member changed from CEO to CHO (Ch. 5) Addition of KPI for commuting accidents, other accidents (Ch. 5.5) Deletion of footnotes regarding reporting of RWE Renewables (Ch. 5 and Annexes 1,3) Images updated (Annex 3 Ch. 4)	
01/05/2021	Responsibility for 'sustainability' changed from CEA to CES (Chapter 5.5) Board pictures updated (Annex 2)	
10/05/2021	Formal adjustments without change in content	
01/05/2022	Update due to HomeRun improvements Integration of GBR_014 RCA into the Directive Correction of Annex 2, Sustainability principles Text revision	
07.03.2024 V 5.0	Amendment of chapter 5.1 and deletion of Annex 1 due to the elimination of the "integrated sustainability principles"	

## 2 Objective

This Group Directive ensures the organisation and implementation of health and safety (H&S) standards in the RWE Group. It includes basic requirements for:

- Health & Safety policy
- Organisational structure and processes in Health & Safety
- H&S targets
- Group initiatives/programmes/standards
- identical terms and Group-wide H&S rules
- Health and Safety management system.

Should you have any questions, comments, etc., regarding the implementation of this Group Directive, please address your feedback to RWE Power AG, *H&S Management and Expertise* (PHS-M). You can also simply and conveniently send your feedback by e-mail.

## 3 Area of application

This Group Directive applies to RWE companies with the following characteristics:

- affiliated companies that are included in the consolidated financial statements<sup>1</sup> and
- perform business activities involving staff and/or assets (e.g. operation of plants, management of real estate/property, etc.).

The Group companies are obliged to ensure – within the scope of their influence – that the requirements of the regulation are fulfilled in the company concerned and in subordinate or managed companies.

The Group companies covered by this Directive (hereinafter 'Group companies') are responsible for implementing the statutory requirements and the minimum standards set by the RWE Group. Compliance with additional regional or country-specific specifications, e.g. Berufsgenossenschaften<sup>2</sup> requirements, must be ensured. The same applies to other stipulations, e.g. requirements from approvals.

Where necessary, this Directive provides for different rules for Group companies that are subject to unbundling requirements. This will ensure compliance with the statutory requirements with regard to the independence of Group companies subject to unbundling requirements in terms of organisation, decision-making authority and conduct of the business to be unbundled and

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<sup>1</sup> see annual report

<sup>2</sup> Employers' liability insurance associations

guarantees the confidentiality of commercially sensitive information as well as compliance with the principle of non-discrimination.

Group companies that are subject to unbundling requirements must ensure that commercially sensitive information of which they become aware in the course of their work is treated confidentially. In particular, such information has to be properly protected against disclosure to competitive and non-competitive units of the Group. In case of disclosure of information that may give rise to economic benefits, compliance with the principle of non-discrimination is ensured.

#### 4 Definition of terms

<b>Audit</b>	Systematic, independent and documented process for evaluating and improving the H&S management system at regular intervals.
<b>Contractors</b>	Contractors and subcontractors working on behalf of RWE at its sites.
<b>Corporate health management (BGM)</b>	Corporate health management (BGM) combines situational and behavioural prevention. It is intended to create the company conditions and integrated company structures and processes for a health-promoting design of work and of company organisation, as well as to enable employees to behave in a health-promoting manner. The central task of BGM is the systematic coordination and purposeful further development of company-specific framework conditions and the creation of opportunities for employees and executives to promote responsibility, health, performance and satisfaction.
<b>Health</b>	Health is a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity.
<b>Health and safety policy</b>	The H&S policy clearly defines the overall objectives of occupational health and safety (OHS) and is aimed at an improvement in OHS performance. It must be appropriate in terms of OHS risks. The H&S policy includes a commitment to the continuous improvement of occupational health and safety and expresses the desire to comply at least with the applicable OHS legislation and other requirements to which the organisation has committed itself. It sets the framework for the OHS targets.

<b>Health protection</b>	Measures for the safe design of the work environment aimed at averting work-related health hazards. Health protection in the workplace combines technology, labour organisation, working conditions and social relations. All stresses and strains affecting employees, be they of a physical, mental or social nature, must be considered in an overall assessment. A purposeful combination of situational and behavioural prevention measures is to prevent any kind of damage to employees' health. This includes the interaction of different work-related influences, ranging from physical and material hazards to physical and mental stresses.
<b>Incident with high injury potential</b>	Incidents that could potentially have severe, very severe or even fatal consequences (irrespective of the actual severity of the incident). The affected Group company or its organisational units/participations are responsible for classifying incidents.
<b>International Health Standard (IHS)</b>	The International Health Standard defines the minimum portfolio of health-related products and services that are offered to every RWE employee worldwide. If required, the Group companies can offer their employees additional health-related products and services beyond the IHS.
<b>LTI (Lost-time incident)</b>	Accident at work and business travel accident (as of 1 <sup>st</sup> day missed)
<b>LTIF (Lost-time incident frequency)</b>	LTIs based on 1 million hours worked
<b>Occupational health and safety</b>	Protecting personnel from damage caused by products and operational processes. Occupational health and safety comprise both on-the-job safety and health protection. OHS measures are designed to prevent accidents at work, occupational diseases and other work-related health hazards. They also include the humane design of the work environment and the humane organisation of the work itself.
<b>Occupational health and safety management officers (AMB)</b>	OHS management officers coordinate the introduction and maintenance of the OHS management system and are appointed by the entrepreneur.

<b>Occupational medicine</b>	<p>Occupational medicine comprises the interrelations between working and living environments and sickness and health. The focus is on retaining and promoting physical and mental health and the functional capacity of working individuals.</p> <p>Occupational medicine relies on a holistic view of working individuals that takes somatic, psychological and social processes into account. It takes action based on a scientifically founded medical inventory of methods and also utilises the findings and methods of other scientific disciplines. Occupational medicine includes</p> <ul style="list-style-type: none"><li>• risk assessment of working conditions,</li><li>• prevention, recognition, handling and appraisal of work-related and environmental risk factors, diseases and occupational illnesses,</li><li>• avoidance of work-related health hazards incl. individual and company health consultations,</li><li>• avoidance of work difficulties and accident risks</li><li>• the prevention of difficult working conditions and accident risks, and professional rehabilitation.</li></ul>
<b>On-the-job safety</b>	<p>The part of occupational health and safety dealing with the safe design of the work environment. A safe design of the work environment requires the safe design and operation of plant and machinery. Safe-design measures are linked with the organisation of labour and the working conditions in order to ensure that accidents and cases of damage are prevented, foreseeable misconduct or incorrect use by the operating staff does not have any long-term consequences and the demands placed on employees are neither too great nor too small.</p>
<b>Root Cause Analysis (RCA)</b>	<p>Method for investigating accidents and other incidents in a structured manner</p>
<b>RCA expert</b>	<p>RCA experts are responsible for analysing and evaluating accidents and other incidents in a goal-oriented, appropriate and methodical manner.</p>
<b>Sickness absence rate</b>	<p>Time off due to illness, accident or spa treatment in relation to target working hours; recording is done according to the laws and regulations of the relevant countries</p>

## **5 Rules, processes and responsibilities**

Health and safety is a central element of RWE's sustainability policy. RWE undertakes to meet the legal H&S requirements and, by continuously improving processes, to prevent work-related injuries and illnesses of employees and provide safe and healthy workplaces. The lost-time incident frequency (LTIF) is a crucial part of the corporate responsibility (CR) report as well as integrated compliance reporting via the Chief Compliance Officer to the Board of RWE AG and the Audit Committee of RWE AG's Supervisory Board and is incorporated in the variable remuneration of the RWE Executive Board members and the Board members/managing directors of the Group companies as a key indicator.

### **5.1 H&S policy and objectives**

The "Occupational health and safety policy" is to be applied by all Group companies in the area of this directive. The Group companies are free to specify the occupational health and safety policy and to communicate on behalf of the responsible management. Health and safety is a central element of RWE's corporate policy. The motto 'All injuries are avoidable – health and safety come first' is implemented by four principles:

1. We all act as role models!
2. We strive for NO accidents!
3. We care for our colleagues and keep our eyes open!
4. We empower our colleagues and contractors to take personal responsibility!

As part of the Group companies' strategy, the Boards/managing directors of the Group companies set quantitative and qualitative H&S targets. These targets must be cascaded down through the hierarchy levels of the Group companies via the target agreement process. This approach serves to advance the H&S continuous improvement process.

In order to determine the LTIF target of the RWE Group, the LTIF targets of the Group companies are requested by RWE Power AG's 'H&S Management and Expertise' OU (PHH-M) and aggregated to a Group value. The LTIF target values are confirmed by RWE AG's CHO.

### **5.2 Responsibility, tasks and organisation**

The Executive Board members and managing directors of the Group companies ensure the implementation of and compliance with legal H&S regulations.



Every Group company is obliged to appoint at least one member of the Executive Board/Management Board who is responsible for health and safety. The overall responsibility of all Executive Board members/managing directors remains unaffected.

The further delegation of tasks within the Group companies is to be specified by organisational rules.

The basis for implementation of and compliance with legal obligations is defined by a suitable occupational health and safety management system (OHSMS) that fulfils the requirements of established OH&S standards. (e.g. ISO 45001). It is recommended that the Group companies obtain external certification.

### **5.3 Management and coordination of health and safety**

The CHO of RWE AG is responsible for the Group-wide coordination and evaluation of H&S. He or she is informed, advised and supported by the head of RWE Power AG's 'Health & Safety' unit.

Group initiatives/programmes/standards related to health and safety are developed in collaboration with the Health & Safety OU of RWE Power AG; the central H&S units of the Group companies are involved in this process.

The RWE Group's International Health Standard (IHS) defines the minimum health-related products and services that are offered to every RWE employee worldwide. The responsibilities for ensuring the IHS in the individual countries are also defined (see Annex 4). If necessary, the Group companies can offer their employees further health-related services in addition to the IHS.

### **5.4 Organisation of processes**

All relevant processes for complying with statutory requirements and the defined standards of the RWE Group must be described in the Group companies.

This applies in particular to the following processes:

- Health & Safety policy
- Assessment of the effectiveness of the (integrated) management system
- Organisation of responsibilities and accountabilities
- Ensuring IHS
- Appointment of officers and integration into the organisation
- Determination of obligations and communication
- Qualification and training of employees and supervisors
- Identification and assessment of hazards
- Cooperation with contractors

- Planning and conducting of audits and inspections
- Investigation into and analysis of accidents and incidents
- Crisis and emergency management

The responsibility for implementing these standards and maintaining and continuously improving existing processes rests with the Executive or Management Boards of the Group companies. The Group companies are free to describe additional H&S rules and processes.

The appointment of an Occupational Health and Safety Management Officer (AMB) to coordinate the assessment and maintenance of a suitable occupational health and safety management system is recommended.

## **5.5 Accident reporting & KPIs in the Group and CR report**

The systematic recording and analysis of incidents supports the evaluation and continuous improvement of health and safety. Group companies are responsible for this. It is carried out according to procedures that enable uniform Group reporting. Differences may exist, for example, due to national legislation. In the event of fatal accidents or other high-risk incidents, the CHO of RWE AG must be informed by the respective Group company.

For Group reporting purposes, KPIs on health and safety are queried, summarised and evaluated on a quarterly basis by the H&S Management and Expertise (PHH-M) unit of RWE Power AG (see Annex 2). In addition, PHH-M provides essential information or KPIs to the following departments:

- Group Compliance
- Strategy & Sustainability
- Group HR Controlling

The accident figures are available online in the [RWE Key Indicator tool](#).

In case of fatal accidents and high-risk incidents, a root cause analysis (RCA) must be carried out by or in cooperation with a RCA expert (see Annex 3). Based on the identified accident causes, suitable measures must be taken to effectively prevent similar incidents in the future.

## **6 Group regulations out of force/concurrently in force**

### **6.1 Group regulations out of force**

Root Cause Analysis Group Business Rule

**6.2 Group regulations concurrently in force**

- Business Directive Sustainability Reporting
- General Supplementary Conditions: Occupational Health and Safety (AZB-Arbeitssicherheit)

**7 Annexes****7.1 Annex 1: Accident reporting, specifications and definitions****7.2 Annex 2: Root Cause Analysis (RCA)****7.3 Annex 3: International Standard**

## 7.1 Annex 1: Accident reporting, specifications and definitions

### 1. Definitions for incident reporting

<b>Accident</b>	<p>An external event of a temporary nature acting on a person, injuring the body.</p> <p>Distinction by accident types:</p> <ul style="list-style-type: none"><li>• Accident at work</li><li>• Business travel accident</li><li>• Commuting accident</li><li>• Other accidents</li></ul>
<b>Accident at work</b>	<p>A work-related incident (incl. business travel accident) that results in an injury or immediate illness,</p>
<b>Business travel accident</b>	<p>Accident on all routes outside the public office building or factory premises while travelling on behalf of the company (e.g. for meeting appointments, customer visits)</p>
<b>Employees</b>	<p>Managing employees + non-pay-scale employees + commercial pay-scale employees + industrial pay-scale employees + other employees (= trainees + marginally employed) (full and part time incl. partial retirement, active and passive!)</p> <p><u>Excluding</u> working students/interns and dormant employment relationships</p>
<b>Hours worked by RWE employees</b>	<p>Planned working time minus absences (e.g. days off, sick leave, holidays, etc.) of the workforce plus overtime of the workforce</p> <p>The hours worked are calculated using the recorded working hours or a daily mean of 7.6 hours.</p>
<b>Hours worked by contractor employees</b>	<p>Hours worked by contractor employees while executing the order.</p> <p>The working hours of contractors are determined as a total (recording, commercial calculation, access control).</p>

<b>LTI (lost-time incidents) involving contractor employees</b>	Accidents at work (as of 1 <sup>st</sup> day missed)
<b>LTI (lost-time incident) involving RWE employees</b>	Accident at work and business travel accident (as of 1 <sup>st</sup> day missed)
<b>LTIF (lost-time incident frequency)</b>	LTIs based on 1 million hours worked
<b>Workforce</b>	Employees + apprentices

## 2. Collection of the data required for reporting

All incidents are reported and recorded in the Group companies at least in accordance with the specifications and definitions given above. In cases of doubt, Health & Safety of the Group company must be involved.

The values required for accident reporting are requested from the Group companies by RWE Power AG's 'H&S Management and Expertise' unit on a quarterly basis:

- LTIs of RWE employees
- LTIs of contractor employees
- Fatal accidents involving RWE employees
- Fatal accidents involving contractor employees
- Hours worked by RWE employees
- Hours worked by contractor employees

RWE Power AG's 'H&S Management and Expertise' unit (PHH-M) requests the sickness rates from RWE AG's 'Group HR Controlling' unit (CHE-P).

## 3. H&S-Reporting

RWE Power AG's 'H&S Management and Expertise' unit prepares quarterly reports for the RWE Group on the incident situation and the sickness absence rate.

The data reported by the group companies (see "2. Collection of data required for reporting") are verified or checked for plausibility. This essentially involves checking whether the reported data show a meaningful trend compared to the previous quarters. If the data does not appear to be sufficiently consistent with the previous quarters, the Group companies are asked to check and, if necessary, correct the data.

The development in occupational safety and health protection and its main causes are classified or commented on in cooperation with the Group companies and summarised into an overall

picture. In particular, the effectiveness of the ongoing improvement measures in the group companies is evaluated and, if necessary, the need for action is identified.

The Group report will be sent to the following groups of persons after completion:

- Executive Board of RWE AG
- Executive Board members or managing directors responsible for occupational Health & Safety in the Group companies.
- Chief Compliance Officer
- HR Managers of the Group companies
- Chairpersons of the central works councils of the Group companies
- Chairpersons of the works councils H & S Committees

## 7.2 Annex 2: Root Cause Analysis (RCA)

### Rules, processes and responsibilities

N°	Process workflow	Explanation
1	<pre> graph TD     Incident([Incident]) --&gt; Fatal{Fatal}     Fatal -- No --&gt; Classification[Incident classification]     Classification -.-&gt; High injury potential  Communication[Communication]     Fatal -- Yes --&gt; Communication     Communication --&gt; Information[Information]     Communication --&gt; RCA_team[RCA investigation team]     RCA_expert{{RCA expert}} --&gt; RCA_team     RCA_team --&gt; RCA[RCA]     RCA --&gt; Documentation[Documentation]     RCA --&gt; Lessons[Lessons learned]     Lessons --&gt; Info_doc[Information/documentation]     Lessons --&gt; End([End])         </pre>	On-site emergency management and collection of information on the incident.
2		The classification and selection of incidents with high injury potential is independent of the actual severity of the incident; the Group company or its organisational units/participations are responsible for classifying the incident. An RCA expert may be involved in the classification process.
3		Depending on the severity of the incident, communication as quickly as possible.
4		Depending on the incident, the Group company or its organisational units/participations must ensure that an investigation team carries out an RCA investigation with the involvement of an RCA expert without delay.
5		Compilation of lessons learned by the Group company or its organisational units/participations and Group-wide communication.

### **7.3 Annex 3: International Health Standard**

#### **Products/ services of the International Health Standard (Minimum Standard)**

- Employee Assistance Programme
- Emergency care
- Preventing and Self Learning Tools
- Medical Access
- Fit for work examinations according to risk assessment
- Return-to-work talks
- Workplace inspections and employee counselling by H&S experts
- Health (competence) as an integral part of
  - Talent & Promoting Process
  - Leadership & Development Programmes
  - Leadership & Executive Meetings

#### **Country-related responsibilities**

- In principle, the head of "Health & Safety" of the Group companies is responsible for the introduction of and compliance with the International Health Standard in the countries in which the Group company is active.
- In countries with several Group companies, the Group company with the highest number of employees working there is responsible for compliance with the International Health Standard.