

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

In order to improve the readability and comprehensibility of these Directive, the use of gender asterisks or similar constructs has been dispensed with. The Directive is addressed to all persons (f/d/m) with equal appreciation.

Instruction / Communication				
Activity	OU	Name	Date	Approval
Setup/ Change	H&S Management & Expertise (PHS-M)		01.01.2021	by E-Mail
Functional release	H&S Management & Expertise (PHS-M)		13.01.2021	by E-Mail
Conformity check	Organisational Development & Management Systems (PED-O)		13.01.2021	by E-Mail
Instruction	Board RWE AG	CEO: Dr. Markus Krebber CFO: Dr. Michael Müller CHO: Zvezdana Seeger	04.05.2021	by circular decision
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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)	
23.07.2020	Amendment of unbundling phrase	
25.08.2020	Update Integrated sustainability principles	
23.11.2020	Update Annex 1	
23.11.2020	Update of unbundling phrase, Chapter 3	
16.02.2021	Update of Annex 3 Integrated Sustainability Guidelines of RWE	
01.01.2021	Addition to reporting as part of integrated compliance reporting (ch. 5)	
01.01.2021	Change of responsible Executive Board member from CEO to CHO (ch. 5)	
01.01.2021	Addition of KPI commuting accidents, other accidents (ch. 5.5)	
01.01.2021	Deletion of footnotes regarding reporting of RWE Renewables (ch. 5 and annex 1,3)	
01.01.2021	Updating of images (Annex 3 ch. 4)	
01.05.2021	Change of responsibility "Sustainability" from CEA to CES (chapter 5.5)	
01.05.2021	Updating of board pictures (Annex 2)	
10.05.2021	Formal adjustments without change in content	

2 Objective

This Group directive serves to organise and ensure uniform, harmonised health and safety (H&S) standards in the RWE Group. It contains basic requirements for the following:

- Definition of H&S policy
- Organisational structure and processes
- Creation of RWE occupational health and safety standards
- Development of proposals for H&S targets
- Establishment of the Group programmes for H&S culture development
- Establishment of uniform terminology across the Group and overarching H&S rules
- Evaluation and development of the occupational health and safety management system (OHSMS)

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 following characteristics:

- affiliated companies which are included in the consolidated financial statements¹ and
- have business activities with staff and / or assets (e.g. operation of plants, real estate / property management, 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 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. BG² requirements, must be ensured. The same applies to other stipulations, e.g. requirements from approvals.

Where necessary, these Guidelines provide for partial deviations regarding group companies that are subject to the unbundling requirements. These provisions ensure, in particular, that the legal requirements regarding the independence of the group companies being subject to the unbun-

¹ see annual report

² Employers' liability insurance associations

ding requirements, with respect to organisation, decision-making powers and the operation of the respective business are fulfilled and that the confidentiality of economically sensitive information as well as compliance with the principle of non-discrimination are ensured.

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

4 Definition of terms

Occupational health and safety	Protecting personnel from damage caused by products and operational processes. Health and Safety comprises both on-the-job safety and health protection. Occupational H&S 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.
Safety	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.
Health	Health is a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity.

<p>Occupational health</p>	<p>Measures for the safe design of the work environment aimed at averting work-related health hazards. Health protection at 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.</p>
<p>Occupational Health Management</p>	<p>Occupational Health Management combines situational and behaviour prevention. Its aim is to establish the operational preconditions and integrated operational structures and processes that allow a health-promoting organisation of labour and operations and enable employees to behave in a manner that is conducive to health. The central task of CHM 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.</p>
<p>Occupational medicine</p>	<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. 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"> • the risk assessment of working conditions, • the prevention, recognition, handling and appraisal of work-related and environmental risk factors, diseases and occupational illnesses, • the avoidance of work-related health hazards incl. individual and operational health advice, • the prevention of difficulties and accident risks, and • employment-promoting rehabilitation.

Health and safety policy	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 health and safety targets.
Occupational safety management officers	OHS management officers coordinate the introduction and maintenance of the OHS management system and are appointed by the entrepreneur.
Sickness-Rate	The sickness rate covers absences of the company’s own employees including apprentices due to illness, accidents and spa treatments (valid in Germany). Recording is in line with the laws and regulations of the countries concerned.
LTI (Lost Time Incident)	A work related injury or illness which causes a person to be absent from work any day after the day of occurrence of the incident.
LTIF (Lost Time Incident Frequency)	Number of incidents resulting in lost time per one million working hours
Root cause analysis (RCA)	Identify the root cause of incidents, accidents and near misses

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, prevent work-related injuries and illnesses of employees and provide safe and healthy workplaces. The LTIF is a crucial part of the corporate responsibility (CR) report as well as the Integrated Compliance Reporting via the Chief Compliance Officer to the Board of RWE AG and the Audit Committee of the Supervisory Board of RWE AG and is incorporated in the variable remuneration of RWE Executive Board members as a key indicator.

5.1 Health and safety policy and objectives

Health and safety is a central element of RWE's corporate policy. The motto "All injuries are avoidable. Occupational Health & Safety comes first" is implemented by five principles:

1. We want NO accidents!
2. We will not work if the activity or work area is not safe!
3. We all act as role models!
4. We keep our eyes open and do not look the other way!
5. We treat contractors!

These rules are part of RWE's [integrated sustainability principles](#) and form the basis for the implementation of health and safety in the Group companies covered by this Directive. The Group companies are free to adopt or supplement the integrated sustainability principles of RWE and to have them signed and communicated by the board members/managing directors in charge.

The principles are updated in response to new insights and strategies. As part of the overall strategy, the Executive Board sets concrete H&S targets. In the Group companies covered by the Directive, these targets must be broken down through the hierarchy levels as part of the target agreement process. This approach serves to advance the H&S continuous improvement process.

5.2 Responsibility, tasks and organisation

The Executive Board members and managing directors of the Group companies covered by this Directive ensure the implementation of and compliance with legal H&S provisions.

Every Group company covered by this Directive 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 board members/managing directors remains unaffected.

The basis for implementation and compliance with legal obligations is defined by a suitable occupational health and safety management system (OHSMS) that meets the requirements of OHSMS standards (e.g. ISO 45001, Safe with System, SESAM). External certification is recommended.

Further delegation within the Group companies covered by this Directive is to be described by organisational rules.

5.3 Management and coordination of health and safety

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

The Steering Committee Occupational Health & Safety (SCOS) is in charge of coordinating the implementation of Group H&S specifications, in particular Group policy and strategy. The SCOS is chaired by the head of RWE Power AG's "Health and Safety" organisational unit. It is staffed with the H&S Managers of the Group companies covered by this Directive, the head of the "Ergonomics and H&S Culture Development" organisational unit and the head of the Occupational Medicine division. Additional experts may be called in if necessary (see Annex 1).

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 covered by this Directive. The (chief) safety engineers of the Group company and other H&S actors must be involved.

This applies in particular to the following processes:

- H&S policy
- Assessment of the effectiveness of the (integrated) management system
- Organisation of responsibilities and accountabilities
- 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 external/contractors
- Planning and conducting of audits and inspections
- Investigation into and analysis of accidents and incidents
- Crisis and emergency management

The OHS management officers appointed for the Group company covered by this Directive advise on the introduction, implementation, maintenance and adaptation of the processes required for the OHSMS.

The responsibility for implementing these standards and maintaining and continuously improving existing processes rests with the Executive or Management Board of the Group companies covered by this Directive.

5.5 Accident reporting and KPIs in the Group and CR report

The systematic recording of and investigation into incidents relevant to on-the-job safety supports the evaluation and improvement of on-the-job safety also as a contribution to RWE's corporate and social responsibility for health and safety.

Responsibility for recording, evaluating and investigating incidents lies with the location or OU heads of the Group companies covered by this Directive. They are assisted by occupational safety specialists. The incidents are recorded across the Group using similar processes. Differences may include the IT systems used or details of the processes due to national legislation.

In the event of fatal accidents or high-potential incidents, the Group companies covered by this Directive or their organisational units form teams to investigate the accident with the participation of RCA experts (see Root Cause Analysis Group Business Rule).

For Group reporting purposes, RWE Power AG's "H&S Management and Expertise" organisational unit on a quarterly basis requests the following H&S KPIs from the Group companies covered by this Directive:

- LTIs of the company's own employees
- LTIs of contractors employees
- Fatal accidents involving the company's own employees
- Fatal accidents involving contractors employees
- Way-to-work accidents
- Miscellaneous accidents
- Hours worked by the company's own employees
- Hours worked by contractors employees
- Sickness-Rate

Further details and standards for a uniform presentation and comparability of the accident statistics are defined in Annex 3.

The accident figures are available online at all times in the KPI tool of RWE AG.

In addition, RWE Power AG's "H&S Management and Expertise" organisational unit is the central point of contact for the *Group Strategy & Sustainability* division for matters relating to sustainability reporting including reporting of RWE AG's LTIF (CR report) and for integrated compliance reporting for the *Compliance* division.

6 Group regulations out of force / concurrently in force**6.1 Group regulations out of force**

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6.2 Group regulations concurrently in force

- [RWE Code of Conduct](#) (incl. supplementary agreement to the Code of Conduct)
- CR Group Directive
- Root Cause Analysis Group Directive
- General Supplementary Conditions

7 Annexes**7.1 Annex 1: Composition and tasks of the Steering Committee Occupational Health & Safety (SCOS)****7.2 Annex 2: Integrated sustainability principles of RWE****7.3 Annex 3: Accident reporting, specifications and definitions**

7.1 Annex 1: Composition and tasks of the Steering Committee Occupational Health & Safety (SCOS)

All meetings are organised and chaired by the Committee leader. Decisions are to be made by consensus (possibly majority vote). All decisions are documented in the meeting minutes. The panel meets at least twice a year.

Committee remit:

- Advising/supporting the Executive Board in terms of H&S strategy and targets
- Developing a Group-wide H&S culture
- Developing strategic principles and prevention programmes
- Developing standards for the organisational structure and processes in line with an OHSMS
- Analysing accidents/high-potential incidents and, if necessary, deriving Group-wide measures
- Assessing and improving health and safety and developing KPIs
- Ensuring the implementation of set minimum standards
- RWE-wide reporting

7.2 Annex 2: Integrated Sustainability Guidelines of RWE

RWE has set itself sustainability targets and an [Ambition & Mission](#): “We are investing massively in the expansion of renewable energies. We are consistently reducing our CO2 emissions until we are climate-neutral by 2040”.

1. Compliance, Health and Safety, Environmental Protection, Energy Efficiency, Quality, Information Security and Corporate Security as well as Data Protection³ are of high importance for us. We have established relevant management systems which are in line with recognised standards.
2. Each manager and employee is responsible for the compliance with these Guidelines in accordance with the [RWE Code of Conduct](#).
3. We comply with legal obligations and self-commitments, consider political developments and align our actions accordingly.
4. We continuously develop our approaches and processes to ensure a resource-conserving and future-oriented energy supply under the condition of economic efficiency. For this we set binding targets.
5. We consider relevant opportunities in our activities to increase value and identify risks to minimize them.
6. We provide the appropriate staff and financial resources to achieve our defined targets and evaluate our achievements on a regular basis.
7. We seek to improve ourselves continuously, e.g. using New Way of Working (NWoW). We assess the effectiveness and appropriateness of our intended integrated management system.
8. All injuries are avoidable. Occupational Health & Safety comes first.

(1) We want NO accidents!	(4) We keep our eyes open and do not look the other way!
(2) We will not work if the activity or work area is not safe!	(5) We treat contractors and RWE employees equally!
We all act as role models!	(6) We understand and comply with the expectations of our internal and external customers. We require the same from our contractors and partner companies.

9. We value the performance of our employees. We promote open communication and support company-wide and secure information exchange.
10. We develop and train our employees and strive for the sustainable increase of their awareness of our integrated management system.
11. We communicate openly about our business and ensure transparency with employees and codetermination, in the RWE Group and the public. We maintain the dialogue with neighbours, public authorities and stakeholders



Dr. Markus Krebber



Dr. Michael Müller



Zvezdana Seeger

³ See also GDI Data Protection Annex 7.1 “Guidelines for Data Protection”

7.3 Annex 3: Accident reporting, specifications and definitions

1. Definitions

Accident	An external event of a temporary nature acting on a person, injuring the body. Distinction by accident types: <ul style="list-style-type: none"> • Accident at work • Business travel accidents • Commuting accident • Other accidents
Accident work-related	Accident during work while performing the professional activity, including business travel accident
Business travel accident	Accident on all routes outside the public office building or factory premises, on behalf of the company (such as meeting appointments, customer visits)
Commuting accident	Accident on the direct route between place of residence and place of work
Other accident	Accident in connection with the insured activity that does not fall into the category of accident at work or commuting accident, e.g. company sports, insect sting, dog bite, injuries caused by the use of force, etc.
Workforce	Employees + apprentices
Employees	Managing employees + non-pay-scale employees + commercial pay-scale employees + industrial pay-scale employees + other employees (= trainees + marginally employed) (full and part time including partial retirement, active and passive!) <u>Excluding</u> working students/interns and dormant employment relationships

<p>Hours worked by the company’s own employees</p>	<p>Planned working time - absences (e.g. days off, sick leave, holidays, etc.) of the workforce + 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>
<p>Hours worked by contractors employees</p>	<p>Hours worked by contractors employees while executing the order.</p> <p>The working hours of contractor are determined as a total (recording, commercial calculation, access control).</p>
<p>LTI (lost-time incident) involving the company’s own employees</p>	<p>Accident at work and business travel accident (as of 1st day missed)</p>
<p>LTI (lost-time incidents) involving contractors employees</p>	<p>Accidents at work (as of 1st day missed)</p>
<p>LTIF (lost-time incident frequency)</p>	<p>LTIs based on 1 million hours worked involving <u>the company’s own and contractors employees</u></p>

2. Collection of the data required for reporting

All incidents are reported and recorded in the Group companies covered by this Directive at least in accordance with the specifications and definitions given.

In cases of doubt, the H&S Manager must be informed. To ensure that classification is uniform across the Group, they involve the “H&S Management and Expertise” organisational unit of RWE Power AG. Should the H&S Manager and RWE Power AG’s “H&S Management and Expertise” organisational unit fail to reach a consensus on classification, it is up to the SCOS to decide.

The values required for accident reporting are requested from the Group companies covered by this Directive⁴ by RWE Power AG’s “H&S Management and Expertise” organisational unit on a quarterly basis.

RWE Power AG’s “H&S Management and Expertise” organisational unit requests the sickness-rate⁵ from the “Human Resources” (HR) organisational unit of RWE Power AG.

^{4,7} RWE Renewables is within the scope of this guideline. In the transition phase, the KPIs for occupational safety and health are only set for RWE Renewables International. From the time of the complete transition, KPIs for occupational safety and health will be collected pro rata for RWE Renewable.

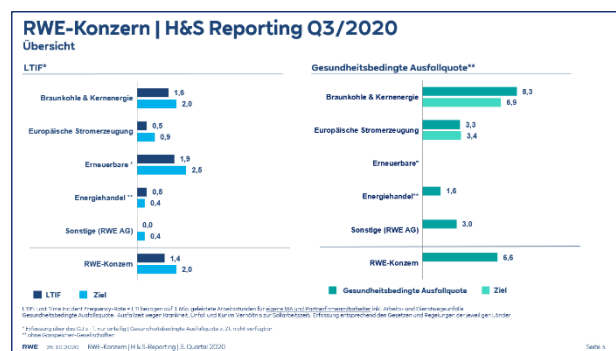
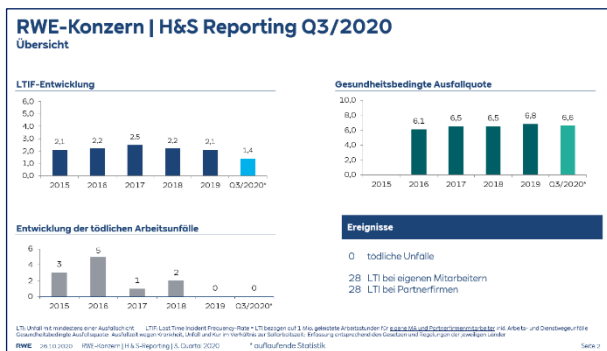
3. Plausibility check

The transferred data is checked for plausibility by RWE Power AG’s “H&S Management and Expertise” organisational unit. The main aim of the check is to determine whether the data provided indicates any meaningful trend compared with previous quarters.

If the data appears inconsistent with the previous quarters, the Group companies will be asked to verify and, if necessary, correct it.

4. Processing of KPIs for reporting purposes

RWE Power AG’s “H&S Management and Expertise” organisational unit prepares a quarterly report on the KPIs of LTIF and health-related absenteeism rate.



The Group report is sent to the Executive Board of RWE AG and to the board members and managing directors of the companies covered by this Directive and published as a PDF file in team:work.

Furthermore, the Group report is sent to the chairpersons of the central works councils and the works council H&S committees as well as the Chief Compliance Officer and the heads of the Human Resources/Personnel Management organisational units of the companies covered by this Directive.

5. Reporting and CR report

To verify the data, the “H&S Management and Expertise” OU of RWE Power AG sends the annual values for the LTIF and the health-related absenteeism rate to the (chief) safety engineers of the

Group companies covered by this Directive⁶. The Group companies report the result of the verification to RWE Power AG's "H&S Management and Expertise" OU.

The "H&S Management and Expertise" OU forwards the verified data for reporting purposes both to the Executive Board of RWE Power AG and to the specialist departments concerned so that it can be utilised in the annual, HR and CR reports.

⁶ RWE Renewables is within the scope of this guideline. In the transition phase, the KPIs for occupational safety and health are only set for RWE Renewables International. From the time of the complete transition, KPIs for occupational safety and health will be collected pro rata for RWE Renewable.