



Policy Statement

Human Rights Strategy



Human
Rights
Strategy

Our Core Standards and Guidelines

We respect and support Human Rights across all our business activities, in accordance with

- the Universal Declaration of Human Rights,
- the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work,
- the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises,
- the UN Guiding Principles for Business and Human Rights (UNGP).

We acknowledge the impact of our operations on the ecological and social environment, which might create adverse impacts on human and environmental rights if not addressed correctly. For this reason, we strive to prevent and mitigate adverse human and environmental rights impacts that have a direct link to our operations, products, or services.

We expect our business partners to do the same as we strongly believe that our responsibility does not end at our own gate but also applies to our suppliers. On this basis, we expect our suppliers and business partners to also take responsibility for complying with and implementing Human Rights and environmental Due Diligence obligations.

We have laid down the core expectations we have of our suppliers in this regard in our [Code of Conduct for Suppliers](#), applicable as an integral part of all business relationships. Our core expectations for our employees regarding business ethics are defined in the [Uniper Code of Conduct](#), which is built on participative input and feedback from our internal departments.

More specific commitments, targets and indicators are defined in this and various other company policies and statements, including the [HSSE and Sustainability Policy Statement](#) and the [Sustainability Strategic Plan](#).

Our Commitments at a glance

(Section 2, German Supply Chain Law)

Respect of Human Rights

- We reject all forms of slavery and all forms of child, compulsory or forced labor, as well as all forms of trafficking.
- We respect labor rights and ensure a safe, healthy, and secure work environment for all employees and contractors; we promote the same standards in our joint ventures and partnerships.
- We recognize the rights of freedom of association and freedom of peaceful assembly, including the freedom to engage in collective bargaining, to join trade unions, the right to strike and participate in works agreements in various countries.
- We commit to an adequate living wage, that amounts to at least the minimum wage as laid down by applicable law and, additionally, is determined in accordance with the regulations of the place of employment.

No Discrimination and Promotion of Equality

- We do not tolerate any form of discrimination or harassment of any kind.
- We promote diversity, equity, and inclusion to ensure equal opportunities among all employees and a more balanced representation of minorities and underrepresented groups in the workforce.

Support of Communities and Protection of the Environment

- We minimize the impact on communities affected by our operations, we strive to prevent pollution, waste, harmful soil change, harmful noise emission or excessive water consumption and ensure a responsible

use of natural resources.

- We commit to a just and fair transition, supporting our people in communities challenged by our plans towards climate neutrality.
- We prohibit the unlawful eviction and taking of land, forests, and waters.
- We forbid the hiring or use of private or public security forces if they violate the prohibition of torture and cruel, inhumane, or degrading treatment, damages life or limb or impairs the right to organize and the freedom of association.
- We commit to international standards regarding the handling of mercury, Persistent Organic Pollutants, the import and export of hazardous waste and the non-environmentally friendly handling of waste, such as the Minamata Convention, the Stockholm Convention, and the Basel Convention.

Risk Management System

(Section 4, German Supply Chain Law)

We consider appropriate Due Diligence regarding human and environmental rights to be an ongoing process. Therefore, our risk management is integrated throughout the company into business and decision-making processes including strategy formulation, business planning, capital allocation, investment decisions, internal control, and day-to-day operations.

To fulfill and to constantly enhance our Human Rights Strategy, we established a continuously monitored and improving Risk Management System to identify, prevent or minimize the risk of human and environmental rights violations and damage to the environment. In our Risk Management System, we focus on the interests and rights of our employees, employees within the supply chain and those who may otherwise be directly affected by our business activities or the activities of a business in our supply chain. The specific responsibility regarding compliance to the German Supply Chain Law lays with the Human Rights Officer, whose role is detailed further in the Responsibilities & Reporting section of this policy statement.

Risk Assessment

(Section 5, German Supply Chain Law)

We regularly screen our own operations and supply chain on risks regarding human and environmental rights and collaborate with our stakeholders and suppliers to define measures in case of any violation of Human Rights or environmental rights.

A regular risk analysis is carried out both for our own operations and for our supply chain. If we are aware of risks and/or violations, the risk analyses are carried out on an ad hoc basis.

In our risk analysis for our own operations, we first classify our departments, employees, and work areas into risk groups, named as risk clusters. This is followed by an abstract risk assessment based on country and industry risk, succeeding by the inclusion of further criteria such as the likelihood, scope, severity and reversibility of the potential risks and violations. The criteria are used to weigh and prioritize the identified risks. Preventive and remedial measures are considered when calculating the final risk values, allowing gross and net risk values to be calculated for each risk cluster. The analysis is based on external databases, indices and studies, internal data, and a workshop.

The risk analysis of the supply chain is divided into an abstract and a concrete risk analysis. The abstract risk score was calculated for all suppliers. For the concrete risk analysis, we prioritize suppliers with high-risk activities and with an increased risk based on the abstract risk analysis. This is followed by the inclusion of further criteria, such as the scope and reversibility of the potential risks and violations. Additionally, where necessary, the risk analysis considers the potential risks as mentioned in the 'Energy sector Risk Profile'. As a result, identified risks are weighted and prioritized to then adjust and apply our predefined measures in a targeted manner if necessary.

Processes and guidance of the risk analysis and consequential mitigation measures are established and further described in our ESG (Environmental, Social, and Governance) Risk Management Policy and our Supplier ESG (Environmental, Social, and Governance) Due Diligence Process. Additionally, we have set up the [Sustainability Strategic Plan](#), which describes material issues, our commitments and our targets.

We have identified potential Human Rights and environmental risks through the risk analysis of our own operations and our supply chain. As Uniper is active in countries with difficult Human Rights conditions the

risk analysis of our own business unit identified potential Human Rights risks, such as the prohibition on unequal treatment in employment. The risks arise primarily due to the risks inherent in the countries. Given the small number of employees in these locations (particularly in the representative offices) and the nature of activities, the risk of actual violation is very limited. Further to this, Uniper makes available support and assistance programs to these employees, if the need arises. Moreover, it is worth noting that Uniper has completely cut its ties with Unipro, as the Russian-bound company ringfencing was successfully implemented back in 2023. Uniper Energy DMCC in the United Arab Emirates was sold in May 2023, but the company was part of Uniper until this date and was therefore considered accordingly in the risk analysis.

The risk analysis for the supply chain also identified potential Human Rights and environmental related risks at our prioritized suppliers, for example the prohibition of disregarding the occupational safety and health. Depending on the identified risk value of a supplier, we implement targeted preventive and remedial measures.

Preventive Measures and Remedial Actions

(Sections 6 and 7, German Supply Chain Law)

Preventive measures and remedial actions are derived based on the risk assessment to avoid potential risks and prevent future violations. In doing so, we rely on a defined and internally documented process. Our main expectations for employees regarding business ethics are defined in the Uniper Code of Conduct. The 'Supplier Code of Conduct' outlines our expectations for suppliers with regard to Human Rights and environment-related topics. Suppliers are expected to respect and support the UN 'Universal Declaration of Human Rights' and to ensure that they are not complicit in Human Rights abuses.

To give an example of measures for relevant business areas we have drawn up guidelines and processes, as well as other measures and actions including dedicated training for employees. Also, we have appropriate procurement strategies and purchasing practices, for example, agreeing on appropriate contract clauses, to prevent and minimize potential risks. As a last resort, termination, or suspension of contracts is possible in specific cases, where a supplier shows continued lack of progress, no engagement or continued severe human or environment-related rights impacts. Prevention measures and remedial actions include implementing adequate and effective controls. To monitor effectiveness and performance of prevention measures and remedial actions we have developed KPIs, that are regularly checked.

Risks on human and environmental rights are continually monitored and reported to relevant-stakeholders to enable the implementation of further measures, if appropriate, within our own operations and along our supply chain. Risk monitoring is performed quarterly to challenge the assessment and effectiveness of measures. This ensures a continuous and up-to-date awareness of risks and enables us to manage them as effectively and efficiently as possible.

Furthermore, to counteract risks for the entire industry and work on industry-wide solutions we actively participate in industry associations and multi-stakeholder initiatives including RECOSI and the Energy Sector Dialog.

Complaints Procedure

(Section 8, German Supply Chain Law)

We want to ensure that all human and environmental rights are respected in our business and supply chain. Therefore, we promote a culture in which our employees and externals feel safe to address and report risks and possible violations.

As part of our risk management system, we have therefore set up a whistleblowing procedure that allows anyone who becomes aware of violations or risks to report them at any time, even anonymously. The whistleblowing procedure helps to develop and implement effective preventive and remedial measures to mitigate or successfully avert potential harm to those affected, society and the environment.

The complaints procedure enables all people who are directly affected, as well as all people who have knowledge of potential or actual violations in our business area or in our supply chain, to submit a report. Various reporting channels can be used for a report. For example, a report can be submitted directly to the Uniper Compliance Whistleblowing Team via our internal reporting channel using the dedicated

whistleblowing contact option at whistleblowing@uniper.energy. The reports are then processed by the Compliance Whistleblowing Team.

Alternatively, whistleblowers can contact our anonymous whistleblower hotline, which is operated by the law firm Simmons & Simmons and can be reached at uniper-compliance@simmons-simmons.com. The anonymous whistleblower channel also enables anonymous communication between the whistleblower and our Compliance Whistleblowing Team through the law firm Simmons & Simmons. At both reporting channels, reports are accepted in all languages and whistleblowers are informed about further processes and procedures.

Each report received will be treated with confidentiality. All claimants benefit from special protection in line with the principles of our 'Code of Conduct' and the corresponding 'Business Directive Whistleblowing Procedure'. Underlying guarantees of this directive are confidentiality, non-retaliation, and adhesion to the applicable data protection laws.

We carry out a regular effectiveness review to check the effectiveness of our complaints procedure and to continuously improve the procedure.

The whistleblowing procedure is described in more detail in our [Rules of Procedure](#).

Responsibilities & Reporting

(Section 4 (3) and 10, German Supply Chain Law)

Our management bears the overall responsibility for our Human Rights Strategy and its implementation. The [Board of Management Compliance Commitment](#) clearly states its rejection of violations of any kind. Our Human Rights Officer (HRO) monitors and advises on the implementation of the Human Rights Strategy and is in regular and ad hoc contact with management. The HRO also coordinates and monitors the implementation of the 'German Supply Chain Act'.

The operational implementation of the Supply Chain Act lies under the responsibility of the Sustainability Team, and particularly the ESG (Environmental, Social, and Governance) Risk & Business Coordination Team, from the HSSE&S (health, safety, security, environment & sustainability) department. The Sustainability Team is responsible, among other things, for carrying out the risk analysis and deriving, developing, and implementing appropriate preventive and remedial measures and works regularly and closely with other relevant departments, such as Legal & Compliance and HR (Human Resources).

The following diagram provides an overview of how our Human Rights Strategy is anchored in our company and who is responsible for it:



We transparently document and report on our processes to prevent Human Rights and environmental rights violations in the industry. We publish our annual [sustainability report](#) that shows how we fulfill our Human Rights Due Diligence responsibilities. We also submit an annual and public report to the Federal Office for Economic Affairs and Export Control (BAFA). Moreover, we revise this Human Rights Policy Statement if there is a significant change or increase in the risk situation for our own business area or for a direct supplier. We also consider the results of the complaints procedure.

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