

Policy Statement on Human Rights Strategy

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1 Introduction

For all employees of Open Grid Europe GmbH, sustainability means harmonising entrepreneurial success with ecological and social responsibility. We achieve this goal through innovative and digital processes, transparency and a high degree of flexibility. We are aware of our responsibility to respect human rights, promote social justice and protect the environment throughout our supply chain and are expressly committed to the goals of the United Nations Global Compact (UNGC). We have fully implemented the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG) in our company and have also committed our suppliers accordingly.

Compliance with social, ecological and ethical standards is extremely important to us. The human rights strategy set out in this Policy Statement is implemented in all relevant business processes of our company and subsidiaries. Our Code of Conduct for all employees reflects OGE's human rights strategy. The Code of Conduct is the foundation of our compliance organisation. It is intended to convey the key principles and rules for lawful and responsible behaviour and provide a framework for dealing with business partners, competitors, public officials and public institutions.

As partners and an important part of our value chain, we expect our suppliers to also observe and comply with these standards. We have drawn up an additional code of conduct for suppliers to ensure a common understanding of these standards. As a clear commitment to compliance, suppliers agree to the contents of this Code of Conduct and address the issues in an appropriate manner in their own supply chains.

The management of Open Grid Europe GmbH is responsible for the implementation of and compliance with the "Policy Statement on Human Rights Strategy". To protect human rights and the environment, we have further developed our established risk management system in line with the LkSG and implemented the measures outlined below.

2 Human Rights Officer

Since the beginning of 2023, the Human Rights Officer at OGE has been Dr Arndt Krieger, Head of Internal Control & Compliance. The Human Rights Officer's duties include monitoring risk management in accordance with the LkSG as well as regular reporting to the Board of Management.

3 Complaints procedure

We have set up a complaints management system which can be used by all business partners, suppliers from across the entire supply chain and other external persons. Complaints can be raised in various ways:

- By post addressed to Compliance Office [or directly to the Human Rights Officer, Dr Arndt Krieger], Open Grid Europe GmbH, Kallenbergstr. 5, 45141 Essen, Germany
- By e-mail to oge-compliance@oge.net
- By telephone on +49 201/3642-14555
- Digital reporting channel: [oge - homepage \(integrityline.com\)](https://www.oge.com/integrityline.com)

The digital reporting platform, which is open to our employees as well as suppliers, customers and other interested parties, allows you to quickly and easily report concerns about possible misconduct that affects our company or the well-being of employees and third parties. You can raise your concern completely anonymously. The information will be treated in complete confidence and initially forwarded only to OGE's

Compliance Office. The reporting system may only be used for information that the reporting individual believes in good faith to be true. Reporting information known to be false is prohibited.

In this way, violations of human rights or labour protection regulations, prohibition of trade union activity, unequal treatment, withholding of an appropriate wage, environmental damage, potentially illegal activities, unethical practices and other violations of the Act on Corporate Due Diligence Obligations in Supply Chains can be reported without barriers.

All reports will be handled by our Compliance Office and our Human Rights Officer.

4 Risk analysis process

The risk analysis is generally conducted once a year and the results are submitted to OGE's management in the "Report on risk management in accordance with the Act on Corporate Due Diligence Obligations in Supply Chains". In addition, detailed reports are prepared ad hoc in response to incidents or complaints raised, and these detailed reports submitted to management without delay.

We conduct annual analyses to identify any potential or actual adverse impacts on human rights and the environment at our direct suppliers. In order to identify specific risks with regard to human rights violations and environmental risks, we assess our direct suppliers' sustainability performance using self-disclosure questionnaires.

The information disclosed by these questionnaires relates to direct suppliers with whom a supply relationship already exists, as well as those who are still in the selection process.

5 Preventive and corrective measures for direct and indirect suppliers

The identified risks are prioritised and either eliminated or minimised through suitable preventive measures that involve the entire company and our direct suppliers. If there are immediate risks to people and the environment in the direct supply chain, these are immediately eliminated by means of suitable measures. In the event of serious and immediate risks to people and the environment, a plan of action and a timetable for reducing and eliminating the violation is drawn up together with the supplier concerned and we monitor its implementation.

If a direct or indirect supplier is in breach of a human rights or environmental obligation, appropriate remedial measures are agreed with the supplier without delay. In the event of violations that cannot be remedied promptly, a plan of action and timetable for ending or minimising the extent of the violation is drawn up together with the supplier.

If the supplier does not implement the action plans drawn up or if the defined target is not achieved, we reserve the right to terminate the business relationship with this supplier as a last resort.

6 Code of Conduct

Complying with laws and internal regulations is a natural part of the way all OGE employees think and act. Compliance with social, ecological and ethical standards is of great importance to our company. As partners and an important part of our value chain, our suppliers are expected to observe and comply with these standards as well. OGE has drawn up a Code of Conduct for suppliers to ensure a common understanding of these standards: [Code of Conduct for Suppliers | OGE](#).

7 Due Diligence Implementation Report

The "Due Diligence Implementation Report" is prepared once a year. This report sets out the risks identified, the measures taken, the effectiveness of the measures and an evaluation of the measures.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "J. Bergmann".

Dr Jörg Bergmann

A handwritten signature in blue ink, appearing to read "Th. Hüwener".

Dr Thomas Hüwener

A handwritten signature in blue ink, appearing to read "F. Reiners".

Dr Frank Reiners