



Code of Conduct for Business Partners

1. Introduction

Preamble

As an energy company based in Germany, we have a great responsibility towards our customers and society. We are aware that our business activities and those of our business partners have an impact on our society and the environment. We therefore see it as our responsibility to ensure that our business partners also comply with our human rights, social, environmental and ethical standards.

Based on the guiding principles of integrity, transparency and fairness, the Code of Conduct for Business Partners serves to promote and uphold respect for human rights, improved working conditions, sustainable environmental protection and our commitment against corruption and bribery. We regard our business partners as strategic partners in order to ensure a sustainable future together with them. In the Code of Conduct for Business Partners, we formulate our expectations of our business partners and call on them to act responsibly.

We expect our business partners to comply with our Code of Conduct for Business Partners and to ensure compliance with our requirements both within their own organization and in their supply chains.

2. Requirements for business partners

2.1 Social responsibility

Die Einhaltung von sozialen Standards ist für STEAG Power von zentraler Bedeutung. Wir sind uns unserer Verantwortung gegenüber den Menschen, die von unseren Geschäftsaktivitäten betroffen sind, bewusst. Daher setzen wir uns für die Achtung der Menschenrechte sowie die Gewährleistung sicherer und fairer Arbeitsbedingungen ein. Wir erwarten von unseren Geschäftspartnern, dass sie diese Werte und die von unserer Geschäftsleitung verlangten menschenrechtsbezogenen und umweltbezogenen Erwartungen einhalten und entlang der Lieferkette angemessen weiteradressieren, sich nachweisbar darin verbessern und ihrer sozialen Verantwortung nachkommen.

2.1.1 Exclusion of forced labor

Compliance with social standards is of central importance to STEAG Power. We are aware of our responsibility towards the people who are affected by our business activities. We are therefore committed to respecting human rights and ensuring safe and fair working conditions. We expect our business partners to adhere to these values and the human rights and environmental expectations demanded by our management and to continue to address them appropriately along the supply chain, to demonstrably improve in these areas and to fulfill their social responsibility.

2.1.2 Exclusion of child labor and protection of young workers

Our business partners undertake to comply with the conventions of the International Labor Organization (ILO), in particular the ILO conventions. As part of their activities and in their supply chains, they ensure that the worst forms of child labor are strictly prohibited in accordance with ILO Convention 182.

For the employment of young workers, ILO Convention 138 on the minimum age for admission to employment and the applicable law in the country of employment on the minimum age must be observed. Accordingly, the age of an employee may not be less than the age at which compulsory education ends under the law of the place of employment and in any case may not be less than 15 years of age. Employees under the age of 18 are subject to special protection as young employees. Within the framework of local regulations, hazardous work and work that has a negative impact on their health, safety or development is therefore prohibited.



2.1.3 Fair working hours

The applicable national laws and industry standards on maximum working hours and minimum daily rest periods must be complied with. In accordance with the recommendations of the ILO, it is suggested that the general maximum working time of 48 hours per week should not be regularly exceeded and that employees should be granted at least one day off after six consecutive working days. Exceptions are made for work that is either of a periodic nature (e.g., seasonal work) or of a permanent nature (e.g., shift work). Both the working hours and the wage regulations must be known to all employees and should be set out in a written employment contract in at least the official language of the country of employment..

2.1.4 Fair remuneration

The remuneration for regular working hours and overtime must at least correspond to the national statutory minimum wage or the minimum standards customary in the industry, whichever is higher. Collective agreements must be observed. In addition, the wage should at least correspond to the minimum subsistence level so that the basic needs of employees and their families can be met by the remuneration.

2.1.5 Prohibition of discrimination

All employees are to be treated with respect and dignity. Any unequal treatment based on ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, nationality, religion or belief, unless this is justified by the requirements of employment, is prohibited, both in direct and indirect form. Unequal treatment also includes the payment of unequal remuneration for work of equal value. Furthermore, our business partners undertake to respect the rights of indigenous peoples. Article 6 of ILO Convention 169, which states that governments must carry out free, prior and informed consultation with indigenous peoples before taking measures that could affect their rights, must be considered.

2.1.6 Freedom of association

The right of all employees to form or join trade unions and to negotiate collectively on the regulation of pay and working conditions must be respected. Employees must not be subject to discrimination or other disadvantages. This also applies in countries where the right to freedom of association and collective bargaining is restricted. Alternative forms of employee representation should be supported here. Furthermore, all employees have the right to freedom of expression and enjoy protection of their personal rights. Our business partners are required to ensure that this is respected.

2.1.7 Health protection, safety in the workplace

Appropriate measures must be implemented to create a safe and healthy working environment. To this end, hazards and potential health risks must be regularly assessed and documented. Dangers of accidents and work-related risks to mental and physical health in the workplace must be eliminated through suitable protective and preventive measures, e.g., suitable work organization with regard to working hours and rest breaks, provision of protective clothing, regular employee training on the topics of health protection and occupational safety.

Our business partners undertake to ensure that when commissioning or using private or public security forces to protect company facilities and projects, no human rights are disregarded due to a lack of instruction or control on the part of the company when deploying the security forces.

2.1.8 Dealing with conflict minerals

Business partners must exercise particular care when dealing with conflict materials. In the case of tin, tungsten, tantalum and gold as well as other raw materials such as cobalt from conflict and high-risk areas, all applicable national legal regulations on conflict materials must be complied with and the OECD guidelines for the promotion of responsible supply chains must be followed.





2.2. Ecological responsibility

We as STEAG Power are aware of our responsibility towards the environment. We are aware that we act as part of a global community and strive to make our business practices as environmentally friendly as possible. We expect our business partners to also comply with the applicable national environmental laws and the international agreements for the protection of the environment specified in the LkSG, to fulfill their ecological responsibility in the long term and to make demonstrable continuous improvements in this area.

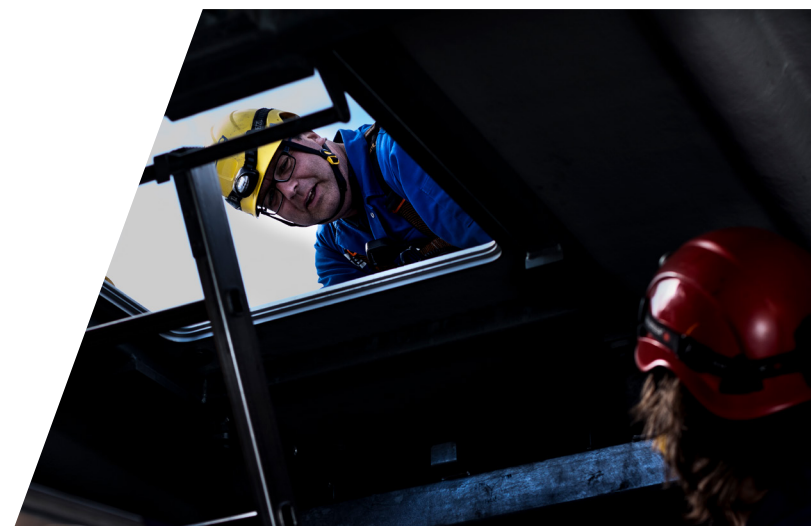
2.2.1 Climate protection

Climate change is one of the most relevant issues of our time. In order to fulfill our responsibility for climate protection, we set ourselves realistic climate targets that are as achievable as possible. We expect our business partners to actively participate in efforts to reduce greenhouse gas emissions, anchor climate targets in their strategy and implement measures to continuously reduce their own emissions.

2.2.2 Handling waste and hazardous substances

We ourselves ensure the proper handling of our waste and hazardous substances as well as the associated tracking and tracing. We expect our business partners to also handle (hazardous) waste and other hazardous substances in accordance with the law and guidelines, properly and carefully. Employees should be made aware of and trained in (hazardous) waste so that they can recognize it and ensure that it is handled appropriately. It should be ensured that a process for regular substance and hazard classification takes place and that the respective statutory requirements for handling are complied with (e.g. F-gases, PFAS substances).

Our business partners undertake to handle, collect, transship, store, transport and dispose of waste in an environmentally sound manner and to comply with the provisions of the Stockholm Convention on Persistent Organic Pollutants (POPs Convention). Hazardous waste is imported and exported across national borders in compliance with the Basel Convention of March 22, 1989 on the Control of Transboundary Movements of Hazardous Wastes and their Disposal. The action plan described in Article 6 of the Basel Convention is complied with in a documented manner. The ban on the production, handling and use of chemicals in accordance with Article 3 paragraph 1 letter a and Annex A of the Stockholm Convention is complied with.



In accordance with the Minamata Convention on the protection of human health and the environment, our business partners undertake not to produce or use mercury or mercury-containing products and to use the best available information and technology in accordance with Article 2b of the Minamata Convention to avoid the human-induced release of mercury into the atmosphere. We expect our business partners to be located in countries where the Basel Convention, the Minamata Convention and the Stockholm Convention have been signed and ratified or where it is ensured that they are complied with at their sites.

2.2.3 Environmental protection and resource consumption

Our business partners are encouraged to monitor and continuously reduce the negative impact of their business activities on the environment. To this end, the company should appoint persons responsible for pursuing environmental goals and implementing appropriate measures. Our business partners undertake to avoid harmful soil, water and air pollution, noise emissions and excessive water consumption that damage the health of people or the environment or significantly impair the natural basis for the preservation and production of food. We encourage our business partners to maintain an environmental management system and to have it certified.

As part of sustainable business practices, business partners must pay attention to reducing their use of resources and their own ecological footprint as far as possible. Wherever possible, renewable energies and resource-conserving technologies are to be used. Our business partners are encouraged to reduce water consumption and minimize water pollution. The processes and standards for the treatment and discharge of industrial wastewater must meet or exceed the minimum legal requirements. The idea of a circular economy must be pursued. The measures should be regularly reviewed and optimized by the business partner.

We expect our suppliers to be committed to the protection of biodiversity and to seek opportunities to contribute to the conservation and restoration of biodiversity.



2.3 Integral business conduct

We as STEAG Power build on fair cooperation and exemplify ethical business behavior. Trust, fairness, honesty and integrity are the cornerstones of our actions. We also expect this from our business partners and their practices. The aim of our actions is to avoid any kind of conflict of interest. We expect our suppliers to make decisions relating to their business activities with STEAG Power solely based on objective criteria. Conflicts of interest with private interests or other economic or other activities, including those of relatives or other related persons or organizations, should therefore be avoided from the outset.

2.3.1 Compliance

We expect our business partners to comply with applicable local, national and international laws. If the principles set out in this Code of Conduct deviate from local regulations, the stricter regulations must be applied.

2.3.2 Corruption and property offenses

Our business partners undertake to take appropriate measures to combat any form of corruption, fraud or asset-damaging offenses, such as tax evasion or embezzlement, in connection with their business activities and to comply with the relevant applicable laws and standards. Our business partners comply with the United Nations (UN) conventions against corruption.

When acquiring, building on or otherwise using land, forests and bodies of water whose use secures a person's livelihood, our business partners ensure that no unlawful forced eviction or unlawful seizure of land, forests and bodies of water takes place, contrary to the respective national laws.

2.3.3 Antitrust and competition law, industrial property rights

Our business partners are committed to fair competition and undertake to comply with applicable antitrust and competition law and industrial property rights. This includes, in particular, refraining from collusion, misleading competition, other activities that distort or restrict competition and the infringement of industrial property rights such as utility models, trademark rights and patents.

2.3.4 Money laundering and terrorist financing

Our business partners undertake to comply with all applicable laws on the prevention of money laundering and terrorist financing. We require them not to be involved, directly or indirectly, in activities that may be associated with money laundering or terrorist financing. Our business partners ensure that effective mechanisms and processes are implemented so that potential violations are recognized immediately and counteracted. The systems are continuously checked for effectiveness and optimized.

2.3.5 Confidentiality and data protection

Business partners undertake to protect trade and company secrets. All data transmitted to the business partner must be stored securely by the business partner and confidentiality must be ensured. Furthermore, the applicable laws on data protection and information security must be observed when collecting, storing, processing, transmitting and passing on personal data within the meaning of Art. 4 para. 1 GDPR. Other third-party property rights must also be observed. Intellectual property rights, including copyrights, patents and trademarks, must be respected.

2.3.6 Customs and foreign trade law

Die Geschäftspartner verpflichten sich, alle anwendbaren Vorschriften des Zoll- und Außenhandelsrechts einzuhalten. Dabei sind nationale sowie internationale Gesetze zu beachten und alle Im- und Exporte korrekt und transparent zu verzollen. Ferner sind Verbote des Außen- und Binnenhandels mit bestimmten Waren, Technologien oder Dienstleistungen sowie Ländern und Personen zu beachten. Des Weiteren verpflichten sich die Geschäftspartner, Antiterror- und Embargobestimmungen einzuhalten, um die nationale Sicherheit zu schützen und Strafen zu vermeiden.



2.3.7 Complaints mechanism

Our business partners undertake to ensure that all employees and third parties along their value chain have the opportunity to report their complaints confidentially and without sanctions via easily accessible and barrier-free communication channels within the framework of local laws. The aim of such a complaints mechanism is to ensure that reported information or violations can be processed quickly and appropriate remedial action can be taken. Complaints received must be documented and STEAG Power must be informed if the case is related to STEAG Power or is assumed to be important for cooperation.



3. 3. Implementation of the requirements

STEAG Power is interested in long-term and trusting business partner relationships and always strives to strengthen and optimize these. Close cooperation makes it possible to develop joint approaches to achieve the goals of both parties even better.

The implementation of this Code of Conduct for Business Partners is of particular concern to STEAG Power. In order to ensure compliance with the requirements of this Code of Conduct for Business Partners, STEAG Power reserves the right to carry out audits itself or have them carried out by third parties as a possible verification of compliance with the Code of Conduct for Business Partners. We expect our business partners to cooperate with and tolerate audits. In addition, certificates, details of measures implemented, process documentation and similar documents may be requested to demonstrate implementation of the requirements set out in the Code of Conduct for Business Partners.

3.1 Mechanism for non-compliance

Should STEAG Power identify violations of the requirements of this Code of Conduct for Business Partners, the business partner is requested to take remedial and improvement measures. The measures must be implemented within a reasonable period of time and in coordination with STEAG Power.

If the remedial and improvement measures are not complied with or are not agreed to, STEAG Power reserves the right to suspend the business relationship in whole or in part and, in the event of persistent non-compliance, to terminate cooperation and contracts extraordinarily after setting a reasonable deadline.

3.2 3.2 Contact and complaints procedure

As part of our Code of Conduct for Business Partners, we attach great importance to open communication and respectful cooperation. We are happy to answer any questions or concerns you may have. You can contact us at any time by e-mail or in person. We will carefully examine your concerns and take appropriate measures to find a suitable solution. Our Compliance Department is at your disposal for this purpose:

<https://www.steag.com/en/company/purchasing>

4. Acknowledgement and consent of the business partner

By signing this Code of Conduct for Business Partners, our business partners confirm that they have read and understood the contents and will ensure compliance. To this end, business partners undertake to communicate the content of this document to their employees and business partners and to take all necessary precautions to implement the requirements.



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