

Policy Statement on Human Rights Strategy

Version, last revised: 1.1, 28 October 2024

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1 Introduction

Open Grid Europe GmbH (OGE) employees share the view that sustainability means reconciling entrepreneurial success with ecological and social responsibility. This goal is achieved through aspirational, company-wide principles, 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 along our supply chain and are firmly committed to the goals of the United Nations Global Compact (UNGC). We have fully implemented the provisions of the Act on Corporate Due Diligence Obligations in Supply Chains (also known as the Supply Chain Due Diligence Act – LkSG) across 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 and forms 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.

Since our suppliers are our partners and an important part of our value chain, we expect them 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 OGE management 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

In early 2023, OGE appointed a Human Rights Officer whose responsibilities include:

- Monitoring the implementation and execution of risk management activities in accordance with Section 4(3) sentence 1 of the Supply Chain Due Diligence Act
- Reviewing the risk analysis in accordance with Section 5 of the Supply Chain Due Diligence Act
- Reviewing the remedial and preventive measures in accordance with Sections 6 and 7 of the Supply Chain Due Diligence Act
- Monitoring compliance with due diligence obligations in accordance with Section 3(1) of the Supply Chain Due Diligence Act
- Preparing the annual report in accordance with Section 10(2) of the Supply Chain Due Diligence Act

3 Complaints procedure

We have set up a complaints management system (sections 7 to 10 of the Supply Chain Due Diligence Act) which can be used by all OGE employees, business partners, suppliers from across the entire supply chain and other individuals from outside the organisation. Complaints can be raised in various ways:

- By post addressed to Compliance Office [or directly to the Human Rights Officer], 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.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 management

OGE has implemented a comprehensive risk management system in accordance with Section 4(1) of the Supply Chain Due Diligence Act, which aims to identify and assess potential supply chain risks at an early stage. This system comprises a definition of the area of application (scope and envisaged processes), risk management (RACI matrix, appointment of a human rights officer and a human rights committee for matters relating to the Supply Chain Due Diligence Act ("LkSG Human Rights Committee"), etc.), analyses of risks relating to own business and the supply chain, this Policy Statement, preventive and remedial measures, the complaints procedure and the documentation requirement.

OGE's human rights strategy pursuant to Section 5 (1) of the Supply Chain Due Diligence Act) is based on international standards and guidelines. It comprises clear regulations and procedures for avoiding human rights violations in the company's own field of business and in its supply chain. The strategy is regularly reviewed and adjusted as necessary. The LkSG Human Rights Committee is made up of the following departments: Human Rights Officer, Sustainability, Procurement, Compliance Office, Legal, HSE, HR, Strategy and Communications.

OGE has introduced preventive measures in accordance with Sections 6(3) to (5) of the Supply Chain Due Diligence Act to minimise potential risks. These measures include training for employees and suppliers, the implementation of codes of conduct and the execution of audits to verify compliance with due diligence obligations.

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 review our direct suppliers' sustainability performance using self-disclosure questionnaires.

The information collected through these questionnaires relates to direct suppliers with whom OGE already has a supply relationship, as well as those who have not yet completed the selection process.

As part of our risk review, we have weighted the risks identified for our own sites and for the supply chain separately in a gross and net risk analysis. For our own business area and for the supply chain, we have identified the following potential human rights risks pursuant to Section 2(2) of the Supply Chain Due Diligence Act as priority risks:

- Occupational health and safety risks
- Environmental impacts

In principle, there are risks in the area of occupational safety and health protection for our business activities, such as, in particular, the construction and maintenance of system-critical network infrastructure, primarily in areas with a high risk potential, such as high-pressure gas transmission and the handling of hazardous substances. OGE has had a number of measures in place for a long time to minimise such risks. Here are some of the most important measures:

- Risk assessment: As an employer, OGE is legally obliged to conduct risk assessments in all areas of activity. Based on the hazards identified, occupational health check-ups and further measures may be required. The resulting internal operating instructions often go beyond the legally required measures to protect employees in order to establish an even better level of safety as an internal standard. For many industry-specific topics, there are internal OGE regulations that are updated and continuously improved on the basis of experience. The 'STOP principle' is applied here (substitution, technical solution before organisational and before personal protective measures).
- Rules and regulations: In order to keep up to date with innovations and legal developments of regulations, OGE internally monitors rules and regulations in order to promptly identify necessary adjustments to protective measures and to update them and establish them in existing processes.
- Duties of employees and suppliers: Employees and suppliers are obliged to work in accordance with the recommendations of the risk assessments conducted by the respective company, for example, in order to ensure their own health and safety. Moreover, it is important to ensure that third parties are not endangered or harmed in the course of performing their work. Also, measures

must be taken to prevent occupational accidents and diseases. Where potential for improvement is identified, OGE employees point out shortcomings to colleagues or employees to improve occupational safety, have the situation defused or adjust the work to a legally compliant level until it is optimised.

- Health and safety at work: As an employer, OGE and its contracted suppliers are responsible for providing a safe and healthy working environment. Both must ensure compliance with national occupational health and safety regulations and applicable European regulations (e.g. EU directives). Excessive physical or mental fatigue and unacceptable risks in the work performed are countered with appropriate and effective measures.
- Occupational health prevention and examinations: These serve to promote occupational health and safety. The early detection of health risks, prophylaxis through vaccinations and targeted advice are intended to minimise health and accident risks across the company, with health management used as a further, complementary pillar for maintaining and promoting the health of employees.
- Safety training: OGE employees must be given induction training before starting work and at least once a year thereafter. The content of such training is tailored to the employees' respective fields of activity and incorporates practical findings from incidents such as accidents, entries in the first-aid book and from the industry as lessons learned, as well as news from changes or new developments in regulations. This ensures that expertise is constantly kept up to date and developed further.
- Safety induction of third parties: Employees of suppliers are also made aware of typical OGE hazards. For this purpose, there are, for example, induction films, but of course the contractors' planned work including the necessary protective measures and documents is also discussed in detail before the start of work, and only then is a work permit issued.
- Regular management inspections: Managers have a particularly important role model function with regard to safety. That is why managers carry out routine as well as event-driven inspections of premises and construction sites and talk to employees and suppliers about safety-related aspects, thus ensuring safety on site and promoting our safety culture.

In principle, there is also a risk of potential negative effects on the air, water and soil as a result of our business activities, such as the construction and maintenance of system-critical network infrastructure. At OGE, based on decades of experience in pipeline construction and operation, a series of preventive measures have been implemented to avoid or minimise the risk of potential negative effects on the air, water and soil. Here are some of the most important measures:

- Quality, safety and environmental management (QSE): OGE has a comprehensive HSE system in place that defines the standards and procedures for ensuring quality, safety and environmental protection.
- Compliance with technical regulations: OGE ensures that all technical regulations and standards are complied with in order to avoid environmental pollution. This includes compliance with regulations on emission control, waste disposal and resource conservation.
- External audits: OGE has regular external audits carried out to verify compliance with environmental regulations and internal standards. These audits help the company to identify potential risks at an early stage and to take appropriate action.

- Compliance with legal requirements: Compliance with laws and regulations is of the utmost priority for OGE. All OGE employees and the employees of suppliers are obliged to observe the legal requirements relevant to their activities. OGE supports its employees by providing training and information to ensure that they are aware of the applicable legislation.
- Risk assessment and risk management: OGE has implemented a comprehensive risk management system that includes the regular assessment and prioritisation of risks. Based on these assessments, measures to minimise risk are derived and implemented.
- Supplier management: OGE carries out risk analyses for its suppliers and assesses their ESG (environmental, social and governance) risks. Suppliers with high risks are monitored more closely and measures are taken to minimise risk.

OGE is aware of the potential risks in these areas and therefore continuously monitors developments in order to maintain the good damage track record to date.

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 and indirect suppliers.

Any immediate risks to people and the environment at the direct suppliers 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 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 direct suppliers as a last resort.

Risks or violations at indirect suppliers that come to our attention are just as important to us as those at direct suppliers. The above measures will also be sought or implemented within the scope of our possibilities in coordination with the direct supplier, who acts as the client for his supply chain

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: [Supplier Code of Conduct | 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.

Essen, 28.10.2024

A handwritten signature in blue ink, appearing to read "Th. Hüwener", written over a horizontal line.

Dr Thomas Hüwener
(CEO)

Essen, 28.10.2024

A handwritten signature in blue ink, appearing to read "Detlef Brüggemeyer", written over a horizontal line.

Detlef Brüggemeyer
(CTO)