

**Renewable Energy & Human Rights Benchmark 2023  
Company Profile**

**Company name** RWE  
**Sub-sector** Project developer  
**Overall score** 20.3% weighted average

Section score	Weighting	For section
50.0%	20%	1. UNGP core indicators
6.8%	40%	2. Salient human rights risks
0.0%	20%	3. Serious allegations
37.6%	20%	4. ACT assessment as conducted by the World Benchmarking Alliance*

Please read the disclaimer at the end of this scorecard and refer to the full methodology when perusing this scorecard. The methodology as well as additional analysis can be found here: [business-humanrights.org](https://business-humanrights.org)

The use of the label "Not met" in the research does not necessarily mean that the company does not meet the requirements as they are described in the accompanying bullet point short text. Rather, it means that the analysts could not find information in public sources that met the requirements as described in full in the 2023 Renewable Energy & Human Rights Methodology document. It is possible that a Company meets the criteria without yet publishing the relevant evidence of doing so. This may include cases where a company has claimed to meet the criteria in the engagement phase or otherwise but where the public record was still not sufficient to meet the criteria by the relevant cut off dates.

**Detailed assessment**

**1. UNGP core indicators based on the 2022 CHRB methodology (20% of total)**

**A. Policy commitments and governance**

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: General HRs commitment: The Company's Policy Statement on RWE's Human Rights Strategy states: 'As a signatory of the United Nations Global Compact, we are committed to upholding human rights, respecting the rights of the employees and their representatives, as well as protecting the environment'. [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="https://www.rwe.com">rwe.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Commitment to UNGPs: This Policy Statement also declares: 'At RWE, we respect internationally recognised human rights and take special consideration of the rights of potentially affected groups. In this spirit, we are committed to the following international standards, among others: Universal Declaration of Human Rights, International Labour Organization's (ILO) Declaration on Fundamental Principles, [...] UN Guiding Principles for Business and Human Rights; OECD Guidelines for Multinational Enterprises'. [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="https://www.rwe.com">rwe.com</a>]</li> <li>Met: Commitment to OECD MNE Guidelines: See above. [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="https://www.rwe.com">rwe.com</a>]</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Commitment to ILO core principles: The Company's Policy Statement on Human Rights declares: 'At RWE, we respect internationally recognised human rights and take special consideration of the rights of potentially affected groups. In</li> </ul>

\* For information on the ACT methodology and scoring criteria please refer to the [World Benchmarking Alliance](https://www.worldbenchmarkingalliance.com).

Indicator Code	Indicator name	Score (out of 2)	Explanation
	Fundamental Principles and Rights at Work		<p>this spirit, we are committed to the following international standards, among others: [...] International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work...' [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="#">rwe.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Explicitly lists all four ILO core principles: The Policy also states: 'We acknowledge the right of employees to form employees' representative bodies, to collectively bargain for the regulation of working conditions and their right to strike. Founding, joining or being a member of a workers' union recognised under applicable law shall not be used as a reason for a lack of equal treatment or retaliation [...] We strictly oppose any form of child labour as defined in the relevant ILO conventions and are committed to its effective abolition [...] Children must not be inhibited in their development. Their dignity must be respected and their safety and health must not be impaired, but protected by appropriate measures [...] We strictly oppose forced or compulsory labour and all forms of slavery, including modern forms of slavery and human trafficking [...] We are committed to maintaining equal opportunities among employees and create and maintain an open and inclusive work environment free from all forms of discrimination or harassment. We stand for fair treatment of all employees and do not tolerate any form of discrimination or unjustified unequal treatment'. Nonetheless, the Company's Social Charter declares that 'RWE recognises the basic right to the freedom of association as well as the right to collective negotiations within the scope of national regulations and existing agreements'. It also indicates that 'In the event of conflicting local legislation, the central Compliance organisation will work with the relevant Group Company to find a provision that comes closest to the intent of these principles'. [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="#">rwe.com</a>] &amp; [Social Charter for the RWE Group, 16/09/2010: <a href="#">rwe.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expects suppliers to commit to ILO core principles: RWE's Human Rights Supplier Contract Appendix declares: 'The Supplier shall support and respect the protection of internationally proclaimed human rights and labour rights, ensuring that it is not in complicit in any human rights or labour rights abuses'. Additionally, the Policy Statement on RWE's Human Rights Strategy states: 'We respect internationally recognised human rights and take special consideration of the rights of potentially affected groups. In this spirit, we are committed to the following international standards, among others: [...] International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work [...] Moreover, this commitment reaches beyond our organisational boundaries and is also applicable to business partners especially direct suppliers. We aim that indirect suppliers also respect human rights.' [RWE Human Rights Supplier Contract Appendix, 12/2022: <a href="#">rwe.com</a>] &amp; [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="#">rwe.com</a>]</li> <li>• Met: Explicitly lists all four ILO core principles for suppliers: As indicated above, the Policy on human rights strategy states that 'this commitment reaches beyond our organisational boundaries and is also applicable to business partners especially direct suppliers. We aim that indirect suppliers also respect human rights'. As described in the second subindicator, the Policy explicitly commits to each ILO core area. [RWE Human Rights Supplier Contract Appendix, 12/2022: <a href="#">rwe.com</a>]</li> </ul>
A.1.4	Commitment to remedy	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to remedy adverse HRs impacts: The Company has provided evidence to BHRRC regarding this sub-indicator. However, the evidence was not material. The evidence refers to the Company's policy for reporting human rights violations and seeking assistance, aligning with the UN Guiding Principles on Business and Human Rights. It also mentions the development of processes for assessing rule violations and highlights the importance of considering the complainant's or whistleblower's input when determining remedial actions during investigations. Nevertheless, this sub-indicator looks for a commitment statement in a public policy document to provide remediation to the adverse impacts on individuals, workers and communities that it has caused or contributed to.</li> <li>• Met: Expects suppliers to make this commitment: The Human Rights Contract Appendix states that 'If the Supplier discovers that a violation of a human rights-related or an environment-related obligation has already occurred or is imminent in its own business area or at a direct sub-supplier, it must without undue delay, take appropriate remedial action to prevent, end or minimise the extend of this violation and inform RWE accordingly'. [RWE Human Rights Supplier Contract Appendix, 12/2022: <a href="#">rwe.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to collaborate with judicial or non-judicial mechanisms: The Company has provided evidence to BHRRC regarding this sub-indicator.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>However, the evidence was not material. The evidence declares that if during a complaint resolution, an agreement cannot be reached, there is the possibility of involving external support for dispute resolution and ultimately, it states that if disagreements persist, the complainant has the option to pursue other actions. No commitment statement to collaborate with judicial or non-judicial mechanisms to provide access to remedy was mentioned.</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to work with suppliers on remedy: The Company provided evidence to BHRRC regarding this sub-indicator. However, the evidence was not material. The evidence refers to a step of the Complaints Procedure, which consists of 'investigates the case and explores options for a solution, within the Company, and-or direct or indirect suppliers, depending on the context'. No commitment statement to collaborate with suppliers to remedy adverse impacts was mentioned.</li> </ul> <p>[Human Rights Rules of Procedure, 03/2023: <a href="https://www.rwe.com">rwe.com</a>]</p>
A.2.1	Commitment from the top	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Board level responsibility for HRs: The Company's Sustainability Strategy Report states: 'The Supervisory Board has a sub-committee that meets regularly to discuss strategic and sustainability matters [The Strategy and Sustainability Committee]'. According to the sustainability strategy report, the Company includes Human Rights issues as strategic and sustainability matters. [Sustainability Strategy Report 2022, 2023: <a href="https://www.rwe.com">rwe.com</a>]</li> <li>• Not Met: Describes HRs expertise of Board member</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Board member/CEO signal importance of HRs in their communications: The Company has provided evidence to BHRRC regarding this sub-indicator. However, the evidence was not material. This sub-indicator looks for evidence that Board members or CEO clearly signal the Company's commitment to human rights (e.g. speeches, presentations or other communications) by publicly discussing why human rights matter to the business or any challenges to respecting human rights encountered by the business.</li> </ul>

## B. Embedding respect and human rights due diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Score of 1 on A.1.2.a</li> <li>• Met: Senior responsibility for HRs implementation and decision making: The Company's Policy Statement on Human Rights declares: 'The Executive Board of RWE AG is responsible for the implementation of this Policy Statement and its compliance. The Chief Human Rights Officer (Director Strategy and Sustainability) is responsible for monitoring human rights risk management at RWE and reports to the Executive Board of RWE AG, at minimum, on an annual basis.' In addition, the Company's 2022 Sustainability Management Report states that 'Within the RWE Group, the Chief Human Rights Officer of RWE AG now has overall responsibility for this task [human rights], also for all of the companies of our corporate Group and the countries in which they operate.' [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="https://www.rwe.com">rwe.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes day-to-day responsibility for implementing HRs commitments: The Company's Policy Statement on Human Rights reveals that the Chief Human Rights officer 'is supported by the human rights expert team located within Group Sustainability as well as our Human Rights Officers (HRO) established in each business unit.' [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="https://www.rwe.com">rwe.com</a>]</li> <li>• Met: Day-to-day resources and expertise allocation in own operations: As indicated above, there is a human rights expert team located within Group Sustainability. The Company has a sustainability team within the 'Strategy &amp; Sustainability department'. The sustainability report states that 'with support from the sustainability team, this director (Chief Human Rights Officer) coordinates activities in the group, often consulting closely with procurement departments and other units. Each segment also has designated responsibilities for due diligence in the area of human rights'. [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="https://www.rwe.com">rwe.com</a>] &amp; [Greenhouse gas emission inventory &amp; Calculation Methodology, 2022: <a href="https://www.rwe.com">rwe.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Resources and expertise allocation in supply chain: In the Sustainable Supply Chain Management document, the Company discloses that 'Dr. Hendrik Voß, Head of Sustainability RWE Supply &amp; Trading GmbH, has been appointed Human Rights Officer for RWE Supply &amp; Trading GmbH'. 'The Chief Human Rights Officer (CHRO) is responsible for the overarching activities related to human rights. The CHRO works in collaboration with [...] Procurement on the further development of appropriate compliance measures on human rights based on agreed objectives. Our Procurement units also provide information on the developed and integrated human rights measures to their respective Human Rights Officer. The relevant specialist units are in charge of ensuring that these measures are implemented and monitored'. The Policy on human rights strategy adds that 'Our human rights experts team reviews the effectiveness of the preventive or mitigation measures introduced on an annual or ad hoc basis where there is a significant change or expansion of the risk situation in our own business and / or our direct supply chain [...] Our procurement departments conduct systematic reviews of compliance with our human rights principles as laid out in this document'. [Sustainable Supply Chain Management, 2023: <a href="https://www.rwe.com">rwe.com</a>] &amp; [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="https://www.rwe.com">rwe.com</a>]</li> </ul>
B.2.1	Identifying human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes process of identifying risks in own operations: The Company's Policy Statement on Human Rights declares: 'As part of the HRRM, we conduct an annual risk analysis concerning human rights. We also implemented a specific guideline concerning the human rights risk analysis that is applicable to all companies within the RWE Group. This risk analysis helps to identify the individual risk for each company within the group whilst considering country-specific factors.' Also, see below. [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="https://www.rwe.com">rwe.com</a>]</li> <li>• Met: Describes process for identifying risks in business relationships: See below. 'Through this annual risk analysis we identify human rights and environmental-related risks in our own business areas and supply chains. Potential risks are categorised as low, medium or high' [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="https://www.rwe.com">rwe.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes global risk identification system incl. stakeholder consultation: The Company's Policy Statement on Human Rights states: 'As part of RWE's Human Rights Risk Management [HRRM], we conduct a groupwide risk-based and systematic analysis to verify that we as a company and our direct suppliers comply with human rights by implementing appropriate measures to prevent, as far as possible end and mitigate negative impacts on human rights within our business operations worldwide. Through this annual risk analysis we identify human rights and environmental-related risks in our own business areas and supply chains. Potential risks are categorised as low, medium or high'. Although the Policy Statement discloses that 'We are also considering the use of consultations with external stakeholders and experts to support the further development and monitoring of the HRRM', no evidence was found that the Company actually performs this analysis involving consultation with affected stakeholders and internal or independent external human rights experts. [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="https://www.rwe.com">rwe.com</a>]</li> <li>• Met: Describes how risk identification system is triggered by new circumstances: The Company's Policy Statement on Human Rights states: 'We develop our HRRM continuously, for example, when a risk analysis is performed following a new activity or business relationship to support strategic decisions or changes in business operations. [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="https://www.rwe.com">rwe.com</a>]</li> <li>• Not Met: Describes risks identified in relation to new circumstances</li> </ul>
B.2.2	Assessing human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes assessment process and discloses salient HRs risks: In its Policy Statement on Human Rights, the Company discloses that through its annual human rights risk analysis 'identify[es] human rights and environmental-related risks in our [its] business areas and supply chains. Potential risks are categorised as low, medium or high. The identified human rights and environmental-related risks are weighted and prioritised depending on the following criteria, among others: - The nature and extent of the business activity, - Our ability to influence the party directly responsible for a risk to human rights or environment-related risk or the violation of those obligation, - The severity of the violation that can typically be</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>expected, the reversibility of the violation, and the probability of the occurrence of a violation of human rights-related or environment-related obligations and - The nature of the causal contribution of the enterprise to the risk to human rights or environment-related risk or to the violation of a human rights-related or environment-related obligations'. [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="https://www.rwe.com">rwe.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Describes how process applies to supply chain: As indicated above, the process includes both own operations and supply chains.</li> <li>• Met: Public disclosure of results of HRs risk assessment: In its Policy Statement on Human Rights, the Company discloses that it identifies 'potential high risks for human rights violations at different stages' of its value chain. At the Material sourcing and mining stage, it identified: unlawful expropriation of land, disregard for OHS and harmful changes to air, water or soil; at the material processing/component production: unlawful expropriation of land and forced labour; at the planning/construction stage: unlawful expropriation of land and harmful changes to air, water or soil; and finally at the operation stage: forced labour. [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="https://www.rwe.com">rwe.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how assessment involved affected stakeholders: The Company's Policy Statement on Human Rights states: 'Through our HRRM, we fulfil our human rights due diligence obligation based on internationally recognised standards, applicable law and regulations including our shared understanding of values at RWE. We also consider the interests and rights of our employees and stakeholders who may be directly impacted by our business operations. Our aim is to enter into an exchange with potentially affected rights holders or their representatives and to take their interests into account for the further development of our HRRM.' However, the sub-indicator looks for a description of how these potentially affected stakeholders are involved in the assessment process. [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="https://www.rwe.com">rwe.com</a>]</li> </ul>
B.2.3	Integrating and acting on human rights risks and impact assessments	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes system to prevent, mitigate and remediate HRs issues: The Company's Policy Statement of Human Rights declares: 'Based on the results of the risk analysis, we implement tailored measures for the controlled Group Companies to address the individual results of the risk analysis. The respective entity is responsible for the implementation of these measures. The RWE's Group Sustainability department is responsible for the design and execution of the annual risk analysis. The respective RWE entity is responsible for the implementation of those measures. This will be steered and monitored by the Human Rights Officer (HRO) in charge for the relevant entity. This process will also be supported by regular internal communication on human rights topics and the introduction of specific training courses targeting relevant employees to raise awareness within our workforce. To support the effectiveness, continuous improvement and further development of our HRRM, corresponding monitoring and reporting processes are performed annually'. [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="https://www.rwe.com">rwe.com</a>]</li> <li>• Not Met: Describes how global system applies to supply chain: The Human Rights supplier contract appendix contains expectations towards suppliers, including obligations and prohibitions. It also discloses the complaints procedure on human rights, which is part of the Human Rights risk management system. However, this subindicator looks for evidence of how the Company proactively develops action plans to prevent, mitigate and remediate human rights issues through its supply chain. [Human Rights Rules of Procedure, 03/2023: <a href="https://www.rwe.com">rwe.com</a>] &amp; [RWE Human Rights Supplier Contract Appendix, 12/2022: <a href="https://www.rwe.com">rwe.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Example of actions decided on at least 1 salient HRs issue</li> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how stakeholders involved in decisions about actions taken</li> </ul>
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes system for evaluation effectiveness of actions: The Policy on human rights strategy indicates that 'as part of RWE's Human Rights Risk Management, we conduct a groupwide risk-based and systematic analysis to verify that we as a company and our direct suppliers comply with human rights by implementing appropriate measures to prevent, as far as possible end and mitigate negative impacts on human rights within our business operations worldwide. Through this annual risk analysis we identify human rights</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>and environmental-related risks in our own business areas and supply chains. Potential risks are categorised as low, medium or high'. However, this subindicator looks for evidence of the specific process it follows to evaluate the 'appropriate measures to prevent, as far as possible end and mitigate negative impacts'. It also adds that 'Our human rights experts team reviews the effectiveness of the preventive or mitigation measures introduced on an annual or ad hoc basis where there is a significant change or expansion of the risk situation in our own business and/or our direct supply chain'. However, no description found on the actual process the expert teams follows to review action plans implemented to fact specific salient risks. [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="https://www.rwe.com">rwe.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Example of lessons learned from evaluation effectiveness of actions</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involves stakeholders in evaluation effectiveness of actions</li> </ul>
B.2.5	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Provides two examples of comms with stakeholders</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes challenges to effective comms and how it is working to address them</li> </ul>

### C. Remedies and grievance mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism accessible to all workers: The Company's Policy Statement on Human Rights states: 'There are several channels for employees and external third parties to report suspected human rights violations and request assistance [...]. The channels are open to everyone who wishes to report violations of rules or regulations that pose a serious risk, including human rights violations and environmental risks to the company. The reporting channels include email, an external legal law firm which can be reached via mail or a toll-free hotline (Simmons &amp; Simmons) and an online reporting tool for RWE employees and are available in multiple languages'. [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="https://www.rwe.com">rwe.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism available in appropriate languages and workers made aware: The Human Rights Rules of Procedure declares that 'The company has established different internal and external two-way channels to receive any complaint, information or notice on human rights and environment-related risks or breaches. The channels linked with the Complaints Procedure correspond to an internal platform denominated BKMS (i.e., Business Keeper Management System), where all employees from RWE can have access to report or raise a complaint. For external stakeholders, a dedicated email for human rights has been established. Furthermore, the law firm Simmons &amp; Simmons LL.P. can be approached. Both external channels can be accessed directly from RWE's website [...] Complaints can be raised in local language.' Additionally, the Company's Sustainability Report discloses: 'Training ensures that employees are aware of and comply with our rules. The Executive Board is also involved in ensuring this. Employees may also attend classroom courses, depending on the risk level of their activities. All employees are regularly informed via in-house channels about other compliance topics such as new developments, existing and new Group guidelines, requirements for compliant behaviour and the risks that may be associated with violations. We encourage our employees to report violations of our Code of Conduct and other non-compliant behaviour to their supervisors, the responsible compliance officers or managers and / or the CCO.' [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="https://www.rwe.com">rwe.com</a>] &amp; [Sustainability Strategy Report 2022, 2023: <a href="https://www.rwe.com">rwe.com</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Describes how workers in supply chain access grievance mechanism: The Company's Policy Statement on Human Rights states: 'There are several channels for employees and external third parties to report suspected human rights violations and request assistance [...]The channels are open to everyone who wishes to report violations of rules or regulations that pose a serious risk, including human rights violations and environmental risks to the company'. Additionally, in its supplier training document, the Company states: 'We advise all Business Partners (incl. suppliers) to implement their own complaints procedure (whistleblower platform) to effectively capture and address any reported risks and/or violations. If Business Partners (incl. suppliers) have not established such a platform, they are able to use RWE's Whistleblower System.' [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="https://www.rwe.com">rwe.com</a>] &amp; [The German Supply Chain Due Diligence Act (LkSG) – Training for Suppliers, 17/05/2023: <a href="https://www.rwe.com">rwe.com</a>]</li> <li>• Not Met: Expects suppliers to convey expectation to their suppliers: The Company has provided evidence to BHRRC regarding this sub-indicator. However, the evidence was not material as it referred to the Company's suppliers and not the suppliers' suppliers.</li> </ul>
C.2	Grievance mechanism(s) for external individuals and communities	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism accessible to all external individuals and communities: The Company's Human Rights Rules of Procedure states: 'For external stakeholders, a dedicated email for human rights has been established. Furthermore, the law firm Simmons &amp; Simmons LL.P. can be approached. Both external channels can be accessed directly from RWE's website: Whistleblower System (<a href="https://www.rwe.com">rwe.com</a>).' [Human Rights Rules of Procedure, 03/2023: <a href="https://www.rwe.com">rwe.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The Company's Human Rights Rules of Procedure also states: 'For external stakeholders, a dedicated email for human rights has been established. Furthermore, the law firm Simmons &amp; Simmons LL.P. can be approached. Both external channels can be accessed directly from RWE's website [...] Complaints can be raised in local language.' The Company has provided evidence to BHRRC regarding this sub-indicator. However, the evidence was not material. No information was found on how the Company proactively makes its external stakeholders, including communities, aware of the grievance mechanisms. [Human Rights Rules of Procedure, 03/2023: <a href="https://www.rwe.com">rwe.com</a>]</li> <li>• Not Met: Describes how external individuals/communities access grievance mechanism</li> <li>• Not Met: Expects supplier to convey expectation to their suppliers: The Company has provided evidence to BHRRC regarding this sub-indicator. However, the evidence was not material as it referred to the Company's suppliers and not the suppliers' suppliers.</li> </ul>
C.7	Remedying adverse impacts	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes approach taken to remedy adverse HRs impacts</li> <li>• Not Met: Describes how remedy would be provided if no adverse impact identified</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes changes to systems, processes and practices to prevent future impacts</li> <li>• Met: Describes approach to monitoring/implementing agreed remedy: In its Human Rights Rules of Procedure, the Company states that once an agreed solution has been reached between the Company and the whistleblower, the next step is to 'Implement plan/actions agreed within the company and, when feasible/required, with the complainant/whistle-blower. All the relevant records of implementation, through an appropriate monitoring for compliance, to assess effectivity of the management actions are gathered and reported. If the solution implementation requires longer than foreseen and informed, it will be communicated to the complainant.' [Human Rights Rules of Procedure, 03/2023: <a href="https://www.rwe.com">rwe.com</a>]</li> <li>• Not Met: Describes approach to learning from incidents if no adverse impacts identified: The Suppliers' Human Rights Training states: 'The complaints procedure is a key aspect of the HRRMS, as it supports our ability to conduct a risk analysis on reported risks and/or violations with the aim of addressing these within a reasonable timescale. This will also allow RWE to monitor the effectiveness of any measures introduced along with preventive and remedial actions.' However, this sub-indicator seeks evidence that the company describes the approach it would take to review and change systems, processes or practices to prevent similar adverse impacts in the future.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			[The German Supply Chain Due Diligence Act (LkSG) – Training for Suppliers, 17/05/2023: <a href="https://www.rwe.com">rwe.com</a> ]

## CSI. Responsible lobbying and political engagement fundamentals

Indicator Code	Indicator name	Score (out of 2)	Explanation
CSI.18	Responsible lobbying and political engagement fundamentals	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Publicly available policy statement(s) (or policy(ies)) setting out lobbying and political engagement approach.: The Company's Code of Conduct declares: 'Dialogue with representatives of government bodies and political parties is indispensable, but we want to avoid even the impression that RWE exercises undue influence. For this reason, we are committed to remaining non-partisan and do not make any contributions to any political parties or organisations and foundations that are closely associated with political parties. RWE does not employ any employees whose main occupation is to hold public office or a parliamentary seat. Nor do we make consultancy agreements or similar 'payment for services' agreements with representatives from such groups of people [...] We are happy for our employees to engage privately in civic, political and democratic as well as social initiatives, especially for charitable and social causes, as long as these activities do not conflict with our business interests. RWE does not pursue its business interests through its employees' activities in this area.' Furthermore, the Sustainability Management Report states: 'RWE adopts a range of engagement methods to build those reciprocal relationships. We have offices in Berlin and Brussels and are engaged in political discussion on energy-related topics and further areas with business importance. In all these engagements we adhere to high standards that are outlined in our Code of Conduct and further documents. [...] We took part in a number of political consultations, mainly in our core markets. The consultations covered a wide range of topics but focused on the further development of the energy markets and the conditions for renewable energy growth; We released an updated Industry Associations Climate Review. In the assessment, we have checked the alignment of certain associations with RWE core climate positions. In some cases, we have taken action to support a better alignment'. However, no political statement found in a policy document showing the lobbying approach. [RWE Code of Conduct, 01/2020: <a href="https://www.rwe.com">rwe.com</a>] &amp; [Sustainability Management Report 2022, 2023: <a href="https://www.rwe.com">rwe.com</a>]</li> <li>• Met: Publicly available policy statement that specifies the Company does not make political contributions: As indicated above, 'we are committed to remaining non-partisan and do not make any contributions to any political parties or organisations and foundations that are closely associated with political parties'. [RWE Code of Conduct, 01/2020: <a href="https://www.rwe.com">rwe.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Disclosure of expenditures on lobbying activities</li> <li>• Not Met: Requirement for third-party lobbyists to comply with the Company's lobbying and political engagement policy (or policies)</li> </ul>

## 2. Salient human rights risks (40% of total)

### D. Indigenous Peoples' and Affected Communities' Rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.PD	Commitment to respect indigenous peoples' rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to respect indigenous peoples' rights with explicit reference to UN Declaration</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Description of process for identifying indigenous persons and customary lands.</li> </ul> <p>Commitment to FPIC (in line with ILO No.169)</p> <ul style="list-style-type: none"> <li>• Not Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources</li> </ul>
D.2.PD	Engagement with all affected communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how local communities identified and engaged in the last two years</li> <li>• Not Met: Provides two examples of engagement with communities</li> <li>• Not Met: Examples of engagement refer to marginalised groups and provide additional detail</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HRs issues</li> <li>• Not Met: Describes how stakeholders views influenced company's HRs approach</li> </ul>
D.3.PD	Benefit and ownership sharing policy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Commitment to identify benefit and ownership sharing: The Sustainability Strategy Report discloses: 'In 2022 allocations continued in the United Kingdom via so-called community funds, and wind farms operated by RWE in the UK and Ireland invested over € 5 million in local communities. Local residents are taking advantage of these funds, which have been made possible by renewable energy, to shape their own strong, sustainable future. From January 2023, the 'RWE climate bonus' will generally apply to all existing RWE plants as well as future ones after once they begin operating in Germany. An amendment to the German Renewable Energy Act has made this possible. Our programme will allow municipalities to receive a 'climate bonus' of up to 0.2 cents for each kilowatt-hour (kWh) of electricity generated by local wind turbines, which will especially benefit communities with powerful plants.' However, this indicator seeks evidence of a public commitment from the Company to identify potential benefits and ownership-sharing options that serve all affected communities. [Sustainability Strategy Report 2022, 2023: <a href="https://www.rwe.com">rwe.com</a>]</li> <li>• Not Met: Commitment includes right to decide own priorities for communities</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Disclosure of statistics for each project describing demographics of benefit/ownership sharing</li> <li>• Not Met: Disclosure how affected communities participated in decision-making</li> </ul>
D.4.PD	Local wind & solar energy access, affordability	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Actions taken to support access and affordability of renewable energy in the value chain</li> <li>• Not Met: Including a timebound actions plan and reporting targets</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Public support for government policies addressing energy access</li> </ul>

## E. Land and resource rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
E.1.PD	Respect for land and natural resource tenure rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Commitment to respect land ownership/natural resources as in VGGT. Discloses how identifies legitimate tenure holders.</li> <li>• Not Met: Disclosure of locations of projects including numbers in urban, rural, natural areas</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Extends expectation to business relationships</li> <li>• Not Met: Steps taken to use leverage to resolve land rights issues or disclosure that no such issues arose</li> </ul>
E.2.PD	Just and fair physical and economic displacement policy implementation including free, prior and informed consent	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Commitment to follow IFC PS 5 for physical and economic displacements</li> <li>• Not Met: Commitment not to relocate without FPIC and to providing compensation</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Publishes statistics on numbers affected by relocations (current and planned projects)</li> <li>• Not Met: Publishes regular reviews of living conditions after relocation</li> <li>• Not Met: Description of approach to physical and economic displacement</li> </ul>

## F. Security and conflict-affected areas (incl. responsible mineral sourcing)

Indicator Code	Indicator name	Score (out of 2)	Explanation
F.1.PD	Operating in or sourcing from conflict-affected areas	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Commitment to heightened HRDD in conflict affected areas</li> <li>• Not Met: Steps taken to assess and mitigate these risks with conflict sensitive lens</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How stakeholders are involved in the process to mitigate risks</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
F.2.PD	Evidence of security provider human rights assessments	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Regularly conducts risk assessment regarding security forces</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to Voluntary Principles on Security and HRs</li> <li>• Not Met: If applicable, discloses use of private security providers and uses only ICoCA members.</li> </ul> <p>If direct employment of security, commitment to follow ICoCA itself.: The Policy Statement on Human Rights declares: 'Where we use our own security personnel to protect our facilities, they are obliged to respect human rights as defined in this document and our Code of Conduct. If we contract a private or public security provider to protect our facilities, we expect, that proper requirements and measures are in place through corresponding specifications and that security personnel respect internationally recognised human rights during their engagement. This protection of our facilities must not involve torture, cruel, inhumane treatment, damage of life and limb or impairs the freedom of association.' However, this sub-indicator seeks evidence that the Company commits to only contact companies that are signatories to the International Code of Conduct for Private Security Providers or if the Company directly employs it security, it commits to abiding by the International Code of Conduct itself. [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="https://www.rwe.com">rwe.com</a>]</p>
F.3.PD	Responsible sourcing of minerals: Arrangements with suppliers	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Statement on OECD Guidance aligned due diligence</li> <li>• Not Met: Requirement on OECD Guidance aligned due diligence in contracts/codes with suppliers</li> <li>• Not Met: Describes work with suppliers on risk assessment and improving DD</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Disclosure of supply chain mapping</li> </ul>
F.4.PD	Responsible sourcing of minerals: Risk identification in mineral supply chains	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes risk identification and disclosure in line with OECD Guidance: The Company has provided evidence to BHRRC regarding this sub-indicator. However, the evidence was not material. This sub-indicator seeks evidence that describes how the Company identifies and prioritizes risks and impacts in its supply chain, as outlined in the OECD Guidance on Responsible Sourcing of Minerals. It also looks for a disclosure of the identified risks.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Expectation of suppliers to disclose supply chain mapping</li> <li>• Not Met: Risk identification process covers all minerals</li> </ul>
F.5.PD	Responsible sourcing of minerals: Risk management in the mineral supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Suppliers using minerals in equipment provided to describe steps taken to respond to risks in supply chain</li> <li>• Not Met: Those suppliers to describe monitoring of risk prevention/mitigation measures</li> <li>• Not Met: Those suppliers to disclose significant improvement over time</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How suppliers and affected stakeholders engaged on strategy</li> <li>• Not Met: Processes cover all minerals</li> </ul>

## G. Protection of human rights and environmental defenders

Indicator Code	Indicator name	Score (out of 2)	Explanation
G.1.PD	Commitment to respect the rights of human rights and environmental defenders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Zero tolerance of threats/attacks on HRDs: The Policy Statement of HR Strategy states: 'We are mindful of the important role of human rights defenders in respecting and promoting human rights and reject any threats, intimidation, defamation and criminalisation against people defending human rights. In addition, we seek constructive dialogue and cooperation with human rights defenders.' [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="https://www.rwe.com">rwe.com</a>]</li> <li>• Not Met: Expectation on business partners in value chain to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Description of how working with HRDs to create safe and enabling environment</li> </ul>

## H. Labour rights (incl. protection against forced labour)

Indicator Code	Indicator name	Score (out of 2)	Explanation
H.1.PD	Health and safety	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Discloses quantitative H&amp;S information (injury rates or lost days, and fatalities): RWE's 2022 Annual Report discloses: 'The key performance indicator established for occupational safety is the number of work-related accidents among in-house and contract staff resulting in at least one day of absence for 1 million work hours (lost time incident frequency- LTIF). The target within RWE Group is 1.9. This figure was exceeded in 2021, but the LTIF dropped back down to 1.5 in 2022. The LTIF for RWE personnel was 1.1 and also dropped compared to the preceding year. Our objective remains to allow not a single fatal work-related accident among our staff or the employees of our partner companies. Unfortunately, a contract worker had a fatal accident while cleaning a coaling system at one of our power plants in November 2022.' Additionally, in its Sustainability Performance Report, the Company discloses its occupational health and safety metrics from 2020 to 2022, including LTIF and the number of fatal accidents for its own employees and contract workers; health rate and sickness rate, etc. [RWE Annual Report 2022, 21/03/2023: <a href="https://www.rwe.com">rwe.com</a>] &amp; [Sustainability Performance Report 2022, 2023: <a href="https://www.rwe.com">rwe.com</a>]</li> <li>• Not Met: Expectation extends to relevant business relationships</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Sets targets for H&amp;S performance (including injury rates or lost days and fatalities): See above. The target for LTIF was 1.9 and no fatal accidents including both own operations and employees of its partner companies. [RWE Annual Report 2022, 21/03/2023: <a href="https://www.rwe.com">rwe.com</a>]</li> <li>• Met: Met targets or explains why not or how improve H&amp;S management systems: RWE's 2022 Annual Report states: 'Unfortunately, a contract worker had a fatal accident while cleaning a coaling system at one of our power plants in November 2022. As always, the incident is being investigated by conducting a root cause analysis. This method is applied to systematically identify the reasons for events with a view to developing measures and strategies to prevent them in the future. All fatal accidents and events that are very likely to lead to serious or fatal injuries are subjected to systematic investigations. Prevention programmes aiming to ensure responsible behaviour among executives are implemented in managing employees.' [RWE Annual Report 2022, 21/03/2023: <a href="https://www.rwe.com">rwe.com</a>]</li> </ul>
H.2.PD	Forced labour risk management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Board level oversight over policies on forced labour in supply chain. How relevant stakeholders informed board discussions</li> <li>• Not Met: Suppliers to have these arrangements in place</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses ongoing efforts to prevent and mitigate forced labour in own ops and supply chain</li> <li>• Met: Factors to be considered when ending a business relationship: The Company's Policy Statement on Human Rights Strategy states: 'Our requirements and expectations towards our business partners can be found on the RWE supplier portal. Business partners are all who do business with us, including suppliers. We and our business partners respect and support the protection of internationally recognised human rights and place special importance on the rights stated in the International Bill of Human Rights and the Core Labour Standards of the International Labour Organization. We are committed to prevent human rights violations within our supply chain and carried out by anyone or any legal entity or institution with which we and our partners do business. Adherence to these standards is necessary for a successful collaboration between RWE and its business partners. Business partners are generally obliged to perform an integrity check before we enter into any official arrangements with them. Our business partners are also generally obliged to continue to comply with statutory requirements after contract execution. If needed, we offer help to enable our business partners to familiarise themselves with our expectations. Concerns about integrity or potential violations of law and/or the Human Rights Appendix will be examined together with our business partner. If these cannot be resolved within a reasonable timescale, we will implement appropriate measures and may take appropriate action including legal action up to termination of the business relationship.' [Policy Statement on RWE's Human Rights Strategy, 12/2022: <a href="https://www.rwe.com">rwe.com</a>]</li> </ul>
H.3.PD	Prohibition of forced labour: Wage practices	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on paying in full and on time in supplier codes and contracts</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on paying workers regularly, in full and on time</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment scope of failure to pay workers in full and on time in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
H.4.PD	Prohibition of forced labour: Restrictions on workers	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Requirements on free movement in supplier codes and contracts</li> <li>• Not Met: Describes working with suppliers on free movement of workers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of restriction of movement in supply chain</li> <li>• Not Met: Capacity building to enable suppliers to cascade forced labour policies down supply chain</li> </ul>
H.5.PD	Freedom of association and collective bargaining	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Commitment on FoA/CB and requirements in suppliers codes and contracts: The Human Rights Appendix states: 'A human right risk within the meaning of this document is a condition in which, on the basis of factual circumstances, there is a sufficient probability that a violation of one of the following prohibitions is imminent: [...] the prohibition of disregarding the freedom of association, according to which a. employees are free to form or join trade unions, b. the formation, joining and membership of a trade union must not be used as a reason for unjustified discrimination or retaliation, c. trade unions are free to operate in accordance with applicable law of the place of employment, which includes the right to strike and the right to collective bargaining'. However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'in accordance with applicable law of the place of employment'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [RWE Human Rights Supplier Contract Appendix, 12/2022: <a href="https://www.rwe.com">rwe.com</a>]</li> <li>• Not Met: Describes work with suppliers on FoA/CB</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of restriction of FoA/CB in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
H.6.PD	Living wage (in supply chains)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Requirements on living wage in supplier codes and contracts: The RWE's Human Rights Appendix states: A human right risk within the meaning of this document is a condition in which, on the basis of factual circumstances, there is a sufficient probability that a violation of one of the following prohibitions is imminent: [...] the prohibition of withholding an adequate living wage; the adequate living wage amounts to at least a minimum wage as laid down by the applicable law and, apart from that, is determined in accordance with the regulations of the place of employment.' However, local wage laws do not necessarily entail providing for a living wage. [RWE Human Rights Supplier Contract Appendix, 12/2022: <a href="https://www.rwe.com">rwe.com</a>]</li> <li>• Not Met: Describes work with suppliers on living wage, beyond tier 1 suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Requirement for suppliers to regularly review definition of living wages with relevant trade unions</li> </ul>

## I. Right to a healthy and clean environment

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.1.PD	Environmental impact assessment and remediation	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Conducts public EIA and CIA for renewable energy projects: The RWE's Biodiversity Policy discloses: 'Our global team of environmental specialists supported by external experts perform analyses, such as environmental impact assessments (EIAs) for all projects. We take the required steps to ensure that all concerns identified are considered before initiating construction. Through detailed planning and in collaboration with authorities, we determine the best location for our assets and associated infrastructure in terms of likely significant impacts on the viability of ecosystems and their ecological functions, including considering rare species or habitats.' However, no evidence was found that the Company performs Cumulative Impact Assessment in its projects. In future assessments, the Company will also be expected to explain or demonstrate under what circumstances it undertakes Cumulative Impact Assessments for its renewable energy projects in order to meet this criteria. [RWE Biodiversity Policy, 12/2022: <a href="https://www.rwe.com">rwe.com</a>]</li> <li>• Not Met: Assessments comply with Espoo Convention and/or the EU Environmental Impact Assessment Directive and fulfil certain standards</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Reports on compliance with government-mandated remediation fund requirements</li> <li>• Not Met: Reports on how an entity guarantees payment for environmental restoration or compensation</li> </ul>
I.2.PD	Life cycle assessment	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Expectation for suppliers to conduct regular public life cycle assessments (including risks related to raw material sourcing, waste, and decommissioning)</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Requires suppliers to have action plans to address adverse impacts identified</li> </ul>

## J. Transparency and anti-corruption

Indicator Code	Indicator name	Score (out of 2)	Explanation
J.1.PD	Anti-corruption due diligence and reporting	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to prohibiting bribes to public officials</li> <li>• Not Met: Expectation extends to relevant business relationships</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Reports on any complaints on corruption and bribery</li> <li>• Not Met: Reports that no such complaints were made</li> </ul>
J.2.PD	Payments to governments & contract transparency	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Publishing a tax CbCR in line with GRI 207-4, or discloses payments made to governments at project-level including for purchase or rent of land or natural resources related to its renewable energy projects: Annually, the Company discloses its payments made to public authorities in its 'Report of the RWE Group on payments made to public authorities pursuant to Section ...', this document states: 'Reportable payments are those made to public authorities if at least €100,000 in payments are made to a single public authority (Section 341t, Paragraph 4 of the German Commercial Code) and one of the reasons for the payments is in accordance with Section 341r, Item 3 of the German Commercial Code ['Activities in the mineral extraction industry as defined by Section 341r, Item 1 of the German Commercial Code are necessary in the RWE Group due to the opencast mines used for electricity generation from lignite']. Disclosure on such payments must be broken down by receiving public entity, reason of payment and project.' However, this sub-indicator looks specifically for the disclosure of payments to governments in regard to renewable energy projects at project level. The Company publishes information in line with GRI 207-4 (however information on number of employees is missing). In future assessments, the Company will be expected to demonstrate it publishes a full tax CbCR and a report on its payments to governments at project level, including for purchase or rent of land or natural resources related to its renewable energy projects [2021 Report of the RWE Group on payments made to public authorities, 30/05/2022: <a href="https://www.rwe.com">rwe.com</a>] &amp; [Sustainability Performance Report 2022, 2023: <a href="https://www.rwe.com">rwe.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Disclosure of terms, contracts, agreements for those payments [2021 Report of the RWE Group on payments made to public authorities, 30/05/2022: <a href="https://www.rwe.com">rwe.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Supports governments to disclose contracts and licenses on renewable energy project in line with EITI</li> </ul>

## K. Diversity, equality and inclusion

Indicator Code	Indicator name	Score (out of 2)	Explanation
K.1.PD	Diversity, equality & inclusion training for management and employees	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Provides mandatory and regular training as per ILO No 190</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Requires suppliers to do the same</li> <li>• Not Met: Provides materials and access to resources for trainings</li> </ul>
K.2.PD	Gender balance and sensitivity	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Timebound action plan to integrate gender lens to all relevant documents including on value chain</li> <li>• Not Met: Demonstrates progress through annual reporting</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Women and non-binary people make up at least 40% of the Company's board of directors and executives, or executive board: The Corporate Governance Declaration 2022 discloses: 'A female quota of at least 30% on the Supervisory Board is to be maintained. This quota was achieved for the first time in the 2016 Supervisory Board elections. Since the 2021 Supervisory Board elections, the female quota on the Supervisory Board has stood at 35%, exceeding the minimum requirement mandated by law.' Also the Declaration declares: 'The Executive Board of RWE is composed of three members: Markus Krebber (49) was appointed to the body with effect from 1 October 2016. He was first in charge of finance, after which he took office as Chairman of the Executive Board as of 1 May 2021. His tenure ends on 30 June 2026. Michael Müller (51) has been on the Executive Board since 1 November 2020 and has been responsible for finance since 1 May 2021. ☐ Zvezdana Seeger (58) was also appointed to the body as of 1 November 2020 for an initial term of three years. She is the company's Labour Director and in charge of human resources and IT.' So 1 out of 3 members of the Executive Board are women. [RWE Annual Report 2022, 21/03/2023: <a href="https://www.rwe.com">rwe.com</a>]</li> </ul>
K.3.PD	Gender wage gap reporting	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Has closed gender wage gap: RWE Generation UK plc, RWE Supply &amp; Trading GmbH and RWE Renewables UK Limited publish annually their UK Gender Pay Gap Report. However, no evidence was found that the Company has closed the gender wage gap. [Gender Pay Gap Results- website, N/A: <a href="https://www.rwe.com">rwe.com</a>]</li> <li>• Not Met: Timebound commitment to close gender wage gap</li> <li>• Not Met: Reports information at company level across multiple pay bands: RWE Generation UK plc, RWE Supply &amp; Trading GmbH and RWE Renewables UK Limited in their UK Gender Pay Gap Report disclose: the median and mean Gender Pay Gap from two different data points: the hourly rate pay gap and the bonus pay gap, also shows the gender pay gap in different hourly rates and the proportion of males/females who receive a bonus. However, no evidence was found of pay gap company-wide across multiple pay bands. [Gender Pay Gap Results- website, N/A: <a href="https://www.rwe.com">rwe.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Expects business relationships to do the same</li> </ul>

## JT. Just transition<sup>†</sup>

Indicator Code	Indicator name	Score (out of 2)	Explanation
JT.1	Fundamentals of social dialogue and stakeholder engagement in a just transition	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Not Met: Public commitment to engage in social dialogue with appropriate parties for purposes of bipartite or tripartite negotiations</li> <li>• Not Met: Discloses the categories of stakeholders it engages with on a Just Transition and how they were identified.</li> <li>• Not Met: Disclosure of steps taken to engage with identified stakeholders and its approach to supporting a just transition.</li> </ul>

<sup>†</sup> Assessment for this sub section has been conducted by the World Benchmarking Alliance, see: <https://www.worldbenchmarkingalliance.org/climate-and-energy-benchmark/>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Demonstrates social dialogue and meaningful engagement with stakeholders on all aspects of a just transition.</li> </ul>
JT.2	Fundamentals of just transition planning	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Demonstrates how it engages in social dialogue, especially with unions and with stakeholders, in the development of its transition planning.</li> <li>• Not Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on workers.</li> <li>• Not Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on affected stakeholders</li> <li>• Not Met: Sets time-bound and measurable indicators to mitigate social impacts of low carbon transition on business relationships.</li> </ul>
JT.3.PD	Fundamentals of creating and providing or supporting access to green and decent jobs for an inclusive and balanced workforce	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Public Commitment to create and provide or support access to green and decent jobs, as part of the low carbon transition.</li> <li>• Not Met: Assesses and discloses the risk of employment dislocation caused by low carbon transition and related impacts on affected stakeholders.</li> <li>• Met: Demonstrates measures taken to create and support access to green and decent jobs for affected stakeholders.</li> <li>• Not Met: Demonstrates measures taken to ensure green and decent jobs promoting equality of opportunity for women and vulnerable groups</li> </ul>
JT.4.PD	Fundamentals of retaining and re-and/or up-skilling workers for an inclusive and balanced workforce	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Public commitment to re-and/or up-skills workers displaced by the transition to a low carbon economy.</li> <li>• Not Met: Disclosure of its process(es) for identifying skills gaps for workers and affected stakeholders, in the context of the low carbon transition.</li> <li>• Met: Demonstrates measures taken to provide re-and/or upskilling, training or education opportunities for relevant stakeholders.</li> <li>• Not Met: Demonstrates measures taken to ensure that the re-and/or upskilling, training or education opportunities promoting equality of opportunity for women and vulnerable groups.</li> </ul>
JT.5.PD	Fundamentals of social protection and social impact management for a just transition	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses contribution to social protection systems for relevant stakeholders, and expectations on business relationships to contribute to social protection of affected stakeholders.</li> <li>• Not Met: Discloses its processes for identifying impacts of low carbon transition on workers' and affected stakeholders' social protection.</li> <li>• Met: Demonstrates contribution to addressing the impact of the low carbon transition on workers' social protection.</li> <li>• Not Met: Demonstrates contribution to addressing the impact of the low carbon transition on affected stakeholders' social protection.</li> </ul>
JT.6.PD	Fundamentals of advocacy for policies and regulation on green and decent job creation, employee retention, education and reskilling, and social protection supporting a just transition	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses process(es) for aligning its lobbying activities with policies and regulation supporting the just transition.</li> <li>• Not Met: Discloses where its lobbying activities do not align with policies and regulation that support the just transition.</li> <li>• Not Met: Discloses action plan addressing misalignment of lobbying activities with policies and regulation that support just transition.</li> <li>• Not Met: Demonstrates lobbying for just transition and regulations enabling green and decent jobs, reskilling and/or social protection</li> </ul>

## M. Responses to Serious Allegations (20% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(0).0	Serious risks of supply chain forced labour		<p>According to recent data, approximately 35% of the world's polysilicon, and 32% of global metallurgical grade polysilicon, the material from which polysilicon is made, is produced in Xinjiang Uyghur Autonomous Region (XUAR). Investigations by UN bodies, academics and journalists have presented evidence on a number of human rights abuses including the use of forced labour in XUAR. In its July 2022 report to the UN General Assembly, the UN Special Rapporteur on Contemporary Forms of Slavery "regards it as reasonable to conclude that forced labour among Uyghur, Kazakh and other ethnic minorities has been occurring in the Xinjiang Uyghur Autonomous Region of China" and finds that some instances of forced labour in the Region "may amount to enslavement as a crime against humanity". The Special Rapporteur states he "considers that indicators of forced labour pointing to the involuntary nature of work rendered by affected communities have been present in many cases" in the context of "State-mandated systems". Further analysis by independent UN experts concluded that the violations in the Region "may constitute international crimes, in particular crimes against humanity" and have urged China to address their "repeatedly raised concerns about widespread violations of the rights of Uyghurs and other Muslim minorities in the Xinjiang Uyghur Autonomous Region (XUAR) on the basis of religion or belief and under the pretext of national security and preventing extremism". [United Nations General Assembly, 19/07/2022, "Contemporary forms of slavery affecting persons belonging to ethnic, religious and linguistic minority communities - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences": <a href="https://documents-dds-ny.un.org/doc/UNDOC/GEN/G22/07/19/G220719_0000_0000.pdf?docId=39212400">documents-dds-ny.un.org</a>] [United Nations Special Procedures, 07/09/2022, "Xinjiang report: China must address grave human rights violations and the world must not turn a blind eye, say UN experts": <a href="https://www.ohchr.org/en/press-releases/2022/09/xinjiang-report">ohchr.org</a>] [Sheffield Hallam University, May 2021, "In Broad Daylight - Uyghur Forced Labour and Global Solar Supply Chains": <a href="https://www.shu.ac.uk/news/2021/05/2021-05-20-in-broad-daylight-uyghur-forced-labour-and-global-solar-supply-chains/">shu.ac.uk</a>] [Business and Human Rights Resource Centre, 02/08/2021, "China: Significant proportion of global solar value chain vulnerable to alleged forced labour in Uyghur Region, says major study": <a href="https://www.business-humanrights.org/en/latest-news/china-significant-proportion-of-global-solar-value-chain-vulnerable-to-alleged-forced-labour-in-uyghur-region-says-major-study/">business-humanrights.org</a>]</p>
M(0).1	Publication of independently verified full solar panel supply chains to raw materials level, including names of suppliers and locations for all destination markets	0	<ul style="list-style-type: none"> <li>• Not Met: The Company states that 'RWE does not source PV modules from Xinjiang for any Renewable projects. We can assure this as we have transparency regarding the production location of the finished PV modules for each project as defined in every contract. Moreover, the production location for each project is verified by a third-party audit.' However, the Company's statement only applies to finished PV modules. This indicator is looking for the disclosure of independently verified mapping of the Company's full solar supply chain. [<a href="#">RWE's response, 2023</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(0).2	<p>If mapping identifies suppliers linked to regions where there is a high risk of forced labour including those identified by UN bodies, the company explains steps taken and how these align with steps expected by the UN Guiding Principles (including reference to assessment of severity of risks, leverage, and crucial nature of business relationships). The company indicates that this information is relevant to all destination markets.</p> <p>•Note: Any disengagement needs to be verified and decision-making to continue engagement with “crucial business relationships” in high-risk area needs to be explained, in line with OHCHR Guidance on Business &amp; Human Rights in Challenging Contexts: “Where a business enterprise has determined that a relationship is indeed “crucial” within the meaning of Guiding Principle 19, and that it will be continuing with the relationship on that basis, it should be transparent with stakeholders and the public at large about the decision-making process used to arrive at that determination and the criteria used, which should be objectively reasonable.”</p>	0	<p>• Not Met: The Company states that 'Specifically regarding the reported situation in Xinjiang, RWE confirms that it does not source finished PV modules from Xinjiang for any Renewable project. In addition, and as a preventive measure, for each potential new supplier, we screen and engage with them to ensure that no counterparty is violating human rights, in order for them to be allowed to enter into a business relationship with RWE to supply goods or services to the company.' However, this statement is not sufficient to meet the requirement of this indicator. The Company's response did not meet the criteria on explaining how steps taken align with steps expected by the UN Guiding Principles (including reference to assessment of severity of risks, leverage, and crucial nature of business relationships) at the time this research is conducted. No further evidence was found. <a href="#">[RWE's response, 2023]</a></p>

#### Disclaimer

This scorecard is based on assessments of publicly available documents on companies' websites by the EIRIS Foundation and BHRRC. Preliminary assessments were shared with companies for feedback. Feedback provided by companies has been analysed and incorporated when relevant to the indicator assessed. Information published or provided by companies after established and communicated cut-off dates<sup>4</sup> are not included for this year's Benchmark. As such this scorecard should be seen as a reflection of feedback received as of September 2023<sup>5</sup>.

The use of the label "Not met" in the research does not necessarily mean that the company does not meet the requirements as they are described in the accompanying bullet point short text. Rather, it means that the analysts could not find information in public sources that met the requirements as described in full in the 2023 Renewable Energy & Human Rights Methodology document. It is possible that a Company meets the criteria without yet publishing the relevant evidence of doing so. This may include cases where a company has claimed to meet the criteria in the engagement phase or otherwise but where the public record was still not sufficient to meet the criteria by the relevant cut off dates.

While the EIRIS Foundations and BHRRC have made reasonable endeavours to ensure that the methodology reflects best and emerging business and human rights practice in identifying, preventing, mitigating and remedying human rights harms as well as other responsible business conduct, it is not currently possible to measure certain human rights harms or other negative impacts directly. As such, a low score in respect of a particular indicator should not be read as implying that harms are necessarily taking place: rather it is a sign that companies have not demonstrated the steps set out in the methodology to reduce the risk of such harms or to uphold other responsible business conduct in the ways described. Conversely, a high score in a particular section or for a specific indicator should not be interpreted as a guarantee of future absence of human rights harm.

**Scores for companies in the different project developer sub-categories (electric utilities, oil and gas, independent power producers) should not be compared to one another** as these categories have been designed to allow for integration of an assessment of efforts towards full decarbonisation of energy production for electric utilities and oil and gas companies, based on the World Benchmarking Alliance's Oil & Gas and Electric Utilities Benchmark, using ACT methodologies. **Scores for equipment (wind turbines and solar) manufacturers should not be compared to project developer scores** as indicators have been tailored to reflect their position in renewable energy value chains.

Caution should be exercised in interpreting small differences in scores between companies within the same category and particularly small differences in the overall weighted scores because of the diversity of independent elements that are combined to produce the overall weighted scores. Scores should be understood in the context of the methods and weightings explained in the Methodology.

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<sup>4</sup> Cut-off dates: 30 June 2023 for companies that did not engage with the benchmark; the expiration of the feedback period (between Aug/Sep 2023) for companies that engaged with the benchmark.

<sup>5</sup> Further outreach and engagement with a subset of companies on the specific issue of exposure to forced labour risks was conducted in October 2023.

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