

Renewable Energy & Human Rights Benchmark 2025 Company Profile

Company name RWE
Sub-sector Project developer
Overall score 38% weighted average

Section score	Weighting	For section
54%	20%	1. UNGP core indicators
9%	40%	2. Salient human rights risks
0%	10%	3.a Response to risk of exposure to forced labour
N/A	10%	3.b Serious allegations
97%	20%	4. Low-Carbon Transition Assessment

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](#).

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 2025 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 CHRB methodology (20% of total)

A. Policy commitments and governance

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> 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, 45383: rwe.com] 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, 45383: rwe.com]
A.2	Commitment to respect the human rights of	2	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> Met: Commitment to ILO core principles: The Company's Policy Statement on Human Rights declares: 'At RWE, we respect internationally recognised human

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	workers: ILO Declaration on Fundamental Principles and Rights at Work		<p>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...'. The Company explicitly commits to each ILO core area. In relation to Freedom of Association and collective bargaining, it states that '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. [...] Our employees can openly and regularly exchange views on working conditions with corporate management in unions and workers' representative bodies in accordance with applicable law. At RWE, we will find local solutions that take into account the relevant national legislation and our own guidelines. [Policy Statement on RWE's Human Rights Strategy, 45383: rwe.com]</p> <ul style="list-style-type: none"> • Met: Expects business relationships 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: rwe.com] & [Policy Statement on RWE's Human Rights Strategy, 45383: rwe.com]
A.3	Commitment to remedy	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to remedy adverse HRs impacts: The Policy statement on human rights states that 'There are several channels for employees and external third parties to report suspected human rights violations and request assistance—as defined in the third pillar of the UN Guiding Principles on Business and Human Rights, "Access to Remedy"'. However, no direct commitment was found in a policy document to remedy adverse human rights impacts that it has caused or contributed to. [Policy Statement on RWE's Human Rights Strategy, 45383: rwe.com] • Met: Expects business relationships 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: rwe.com] • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms • Not Met: Commitment to work with business relationships 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. No further evidence found during last review. [Human Rights Rules of Procedure, 03/2023: rwe.com]
A.4	Commitment from the top	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • 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: rwe.com] • Not Met: Describes HRs expertise of Board member • Not Met: Board member/CEO signal importance of HRs in their communications: Company provided feedback to this indicator but information was not material.

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			<p>This indicators requires evidence that the CEO/Board member was spoken publicly about the importance of Human Rights.</p> <ul style="list-style-type: none"> • Met: CEO or board incentives: The Executive Board, including the CEO has individual performance indicators to determine the bonus. These include 'collective CSR/ESG performance and employee motivation', which has a weighting of 25%. ESG KPIs are related to 'groupwide adherence to compliance standards and the code of conduct' [which include human rights], 'maintenance of the high occupational safety standard/low accident frequency', 'integration of international environmental and social [including human rights] standards in the supply chain', 'maintenance of strong employee motivation'. It indicates that 'In the CSR/ESG area, all goals relating to adherence to compliance and social standards in the supply chain were fully achieved, while the Code of Conduct was adhered to. [...]' The targets of maintaining the high occupational safety standards as well as the accident and lost-time incident quotas were overachieved. Overall, the degree to which CSR/ESG and employee motivation goals were achieved was 108%'. [2023 Remuneration report, N/A: rwe.com]
A.5	Responsible lobbying and political engagement fundamentals	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • 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. No further details found during last review. [Code of Conduct, 01/2020: rwe.com] & [Sustainability Management Report 2022, 2023: rwe.com] • Met: Monetary value of direct 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'. [Code of Conduct, 01/2020: rwe.com] • Not Met: Monetary value of indirect political contributions • Met: Requirement for third-party lobbyists to comply with the Company's lobbying and political engagement policy (or policies): The company has report that "RWE is not working with third party lobbyists"

B. Embedding respect and human rights due diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.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> <ul style="list-style-type: none"> • 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,

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			<p>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, 45383: rwe.com]</p> <ul style="list-style-type: none"> • 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, 45383: rwe.com] • 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 & 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, 45383: rwe.com] & [Greenhouse gas emission inventory & Calculation Methodology, 2022: rwe.com] • 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 & Trading GmbH, has been appointed Human Rights Officer for RWE Supply & 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: rwe.com] & [Policy Statement on RWE's Human Rights Strategy, 45383: rwe.com]
B.2	Identifying human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • 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, 45383: rwe.com] • 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, 45383: rwe.com] • Not Met: Describes 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

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			<p>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. No further details found during last review on expert and affected stakeholder consultation. [Policy Statement on RWE's Human Rights Strategy, 45383: rwe.com]</p> <ul style="list-style-type: none"> • 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, 45383: rwe.com]
B.3	Assessing human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • 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 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, 45383: rwe.com] • Met: Describes how process applies to supply chain: As indicated above, the process includes both own operations and supply chains. • 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, 45383: rwe.com] • 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, 45383: rwe.com]
B.4	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> <ul style="list-style-type: none"> • 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

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			<p>improvement and further development of our HRRM, corresponding monitoring and reporting processes are performed annually'. [Policy Statement on RWE's Human Rights Strategy, 45383: rwe.com]</p> <ul style="list-style-type: none"> • 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. The Company's report on the German SC due diligence act reports preventive measures such as prequalification, and 'RWE provides all suppliers with whom a contract is concluded with appropriate training material. This provides an overview of the objectives of the Supply Chain Due Diligence Act and the resulting expectations and obligations'. However, no evidence found of how the Company systematically takes proactive action to address impact/salient issues in the supply chain, as current evidence seems to refer to individual risk prevention measures in suppliers. [2023 German SC DD Act report, 45413: rwe.com] & [RWE Human Rights Supplier Contract Appendix, 12/2022: rwe.com] • Not Met: Example of actions decided on at least 1 salient HRs issue: Although the Company reports on preventive measures these are general and seem related to individual suppliers' process, as described above. However, no evidence found of specific action plans implemented to address a specific salient impact. [2023 German SC DD Act report, 45413: rwe.com] • Not Met: Describes how stakeholders involved in decisions about actions taken
B.5	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> <ul style="list-style-type: none"> • Not Met: Describes system for evaluation effectiveness of actions: The Policy on human rights strategy indicates 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'. The report on German SC DD act states that 'The appropriateness and effectiveness of the risk management system is reviewed by the Human Rights Expert Team of RWE AG with the support of a cross-departmental task force and discussed at the level of the Human Rights Officers. The Human Rights Risk Management System (HRRMS) and all procedures and processes relevant to the HRRMS are reviewed regularly, but at least once a year, by the Human Rights Expert Team and updated if necessary. Within the subsidiaries, the appropriateness and effectiveness of the measures are ensured by the respective specialist departments. However, evidence seems to focus in reviewing the system itself rather specific action plans implemented to address particular impacts. [Policy Statement on RWE's Human Rights Strategy, 45383: rwe.com] & [2023 German SC DD Act report, 45413: rwe.com] • Not Met: Example of lessons learned from evaluation effectiveness of actions • Not Met: Involves stakeholders in evaluation effectiveness of actions
B.6	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Provides one example of comms with stakeholders • Not Met: Describes challenges to effective comms and how it is working to address them

C. Remedies and grievance mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • 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 & Simmons) and an online reporting tool for RWE employees and are available in multiple languages'. [Policy Statement on RWE's Human Rights Strategy, 45383: rwe.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • 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 & 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, 45383: rwe.com] & [Sustainability Strategy Report 2022, 2023: rwe.com] • 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, 45383: rwe.com] & [The German Supply Chain Due Diligence Act (LkSG) – Training for Suppliers, 17/05/2023: rwe.com] • Met: Expects business relationships to convey expectation to their business relationships: The Company indicates that 'All potentially involved parties have access to the complaints procedure. This includes employees of RWE AG and all subsidiaries as well as all direct and indirect suppliers and all persons involved within the supply chain. [2023 German SC DD Act report, 45413: rwe.com]
C.2	Grievance mechanism(s) for external individuals and communities	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • 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 & Simmons LL.P. can be approached. Both external channels can be accessed directly from RWE's website: Whistleblower System (rwe.com).' [Human Rights Rules of Procedure, 03/2023: rwe.com] • 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 & 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 indicates that 'We recognise that what we do impacts the communities in which we operate. This is why, for us, community engagement is a priority. We actively seek an open dialogue that empowers local people to participate in the creation of a greener future'. It adds that 'We have created a central complaints channel accessible to all. This offers individuals or community groups the opportunity to register their concerns and complaints, anonymously if desired. We aim to create a confidential space for community members to communicate their thoughts, ensuring that their voices are heard and valued'. Finally, in the context of measures to prevent and minimise risks, the German SC DD act report states that 'The nature of the complaints procedure offers a low threshold for access, and it was simplified once again at the beginning of 2024. The numerous contact options that take into

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			<p>account the native language of the complainant and the possibility of anonymised complaints ensure an appropriate complaints procedure'. However, no details were found on how it specifically communicates or makes sure that communities are aware of grievance mechanisms. [Human Rights Rules of Procedure, 03/2023: rwe.com]</p> <ul style="list-style-type: none"> • Not Met: Describes how external individuals/communities access grievance mechanism: Although suppliers have access to grievance mechanisms, it is not clear that suppliers' and other business relationships' affected external stakeholders have access too. [2023 German SC DD Act report, 45413: rwe.com] • Not Met: Expects business relationships to convey expectation to their business relationships
C.3	Remedying adverse impacts	0.6667	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes approach taken to remedy adverse HRs impacts • Not Met: Describes changes to systems, processes and practices to prevent future impacts • 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: rwe.com]

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> <ul style="list-style-type: none"> • Not Met: Commitment to respect indigenous peoples' rights with explicit reference to UN Declaration: The Community engagement policy states that 'RWE is dedicated to respecting the legal, constitutional, and regulatory rights of Indigenous Peoples. The company is committed to fostering meaningful relationships with Indigenous Peoples and collaborating on sustainable initiatives and economic development opportunities that align with their cultural values and priorities'. The Policy on human rights indicates that 'We respect the rights of local communities and indigenous people that might be affected by our business operations and take into account the local impact of our business. We do not participate in unlawful taking of land, forests and waters in acquisition, development or use'. However, no evidence was found of a policy commitment explicitly referencing the UN Declaration on the Rights of Indigenous Peoples through its own operations and value chain. [Community engagement policy, 45261: rwe.com] & [Policy Statement on RWE's Human Rights Strategy, 45383: rwe.com] • Not Met: Description of process for identifying indigenous persons and customary lands. • Not Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources • Not Met: Commitment to FPIC
D.2.PD	Engagement with all affected communities	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Describes how local communities identified and engaged in the last two years: The Company states that 'RWE considers communities in and near to the areas in which we operate as a group of stakeholders, including but not limited to residents, local businesses, other sea users, elected officials, regulators, educational institutions and civic as well as non-profit organizations which are potentially impacted by our activities and which impact RWE in return. We aim to consult with stakeholders so that we can better understand potential impacts and identify how appropriate amendments to project design and decision-making process can be considered to minimise impacts and maximise the potential for positive outcomes for local communities as far as reasonably possible throughout every life cycle stage. Specific stakeholder groups may vary by business activity, country and legal requirements. It also states that 'In addition, we have published

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>an internal community engagement framework that serves as a guideline for our employees and helps to ensure the successful implementation of our community engagement policy'. It also points out that 'As every country, business activity and site have its own conditions, the principles are implemented in accordance with the respective country and project-specific conditions and in compliance with regulations. However, no description was found on the specific process that the Company follows to identify stakeholders in the last two years. [Community engagement policy, 45261: rwe.com]</p> <ul style="list-style-type: none"> • Not Met: Provides two examples of engagement with communities • Not Met: Examples of engagement refer to marginalised groups and provide additional detail • Not Met: The company meets B2.C, B3.D, B4.D and B.5.C
D.3.PD	Benefit and ownership sharing policy	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • 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. No further evidence found during last review. [Sustainability Strategy Report 2022, 2023: rwe.com] & [2023 Sustainability strategy report, 2024: rwe.com] • Not Met: Commitment includes right to decide own priorities for communities • Not Met: Disclosure of statistics for each project describing demographics of benefit/ownership sharing • Not Met: Disclosure how affected communities participated in decision-making
D.4.PD	Local wind & solar energy access, affordability	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Actions taken to support access and affordability of renewable energy in the value chain: Although the Company reports in relation to community investment and engagement, no evidence found of specific actions to support access and affordability of renewable energies. The company also stated that 'the company strategy includes expectations of its energy supply to remains both reliable and affordable. The Company has commented that it is focusing on parts of the supply chain and do not have any grid.' [2023 Sustainability strategy report, 2024: rwe.com] • Not Met: Public support for government policies addressing energy access • Not Met: Including a timebound actions plan and reporting targets

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	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Policy commitment to respect land ownership/natural resources: The policy statement on human rights indicates that 'we do not participate in unlawful taking of land, forests and waters in acquisition, development or use'. No further details found. The company provided feedback to this indicator but evidence was not material. [Policy Statement on RWE's Human Rights Strategy, 45383: rwe.com] • Not Met: Identification of legitimate tenure rights holders • Not Met: Extends expectation to business relationships • Not Met: Steps taken to use leverage to resolve land rights issues or disclosure that no such issues arose

Indicator Code	Indicator name	Score (out of 2)	Explanation
E.2.PD	Just and fair physical and economic displacement policy implementation including free, prior and informed consent	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to follow IFC PS 5 for physical and economic displacements: The company provided feedback to this indicator but it was not material. • Not Met: Description of compensation for resettlement • Not Met: Publishes statistics on numbers affected by relocations (current and planned projects) • Not Met: Publishes regular reviews of living conditions after relocation OR description of approach to physical and economic displacement

F. Security and conflict-affected areas

Indicator Code	Indicator name	Score (out of 2)	Explanation
F.1.PD	Operating in or sourcing from conflict-affected areas	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to heightened HRDD in conflict affected areas • Not Met: Steps taken to assess and mitigate these risks with conflict sensitive lens • Not Met: How stakeholders are involved in the process to mitigate risks
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> <ul style="list-style-type: none"> • Not Met: Description of implementation of security approach and example: 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, no evidence was found on how the Company implements the approach, and no example of how it ensures respect for human rights in the course of maintaining the security of company managed operations was provided. [Policy Statement on RWE's Human Rights Strategy, 45383: rwe.com] • Not Met: Description of monitoring of business partners: As indicated above, the Human rights supplier contract annex states that 'the prohibition of the hiring or use of private or public security forces for the protection of the enterprise's project if, due to a lack of instruction or control on the part of the enterprise, the use of security forces a. is in violation of the prohibition of torture and cruel, inhumane or degrading treatment, b. damages life or limb or c. impairs the right or organise and the freedom of association'. However, no details found describing how it enforces this. [RWE Human Rights Supplier Contract Appendix, 12/2022: rwe.com] • Not Met: Local communities engaged in assessment of security • Not Met: Example of working with community on this issue

G. Responsible mineral sourcing

Indicator Code	Indicator name	Score (out of 2)	Explanation
G.1.PD	Responsible sourcing of minerals: arrangements with suppliers	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Statement on OECD Guidance aligned due diligence • Not Met: The policy explicitly covers all minerals • Not Met: Policy expectations of suppliers • Not Met: Contractual requirement for smelters/refiners to follow OECD
G.2.PD	Responsible sourcing of minerals: mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Identification and mapping of suppliers • Not Met: Traceability system for mineral supply chain • Not Met: Discloses smelters/refiners that are most significant part of supply chain • Not Met: Suppliers in higher risk activities, geographies, products
G.3.PD	Responsible sourcing of minerals:	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Identification and prioritising of risks in supply chain • Not Met: Expectation on suppliers to disclose • Not Met: Processes cover minerals assessed as highest risk

Indicator Code	Indicator name	Score (out of 2)	Explanation
	risk identification in mineral supply chains		

H. Protection of human rights and environmental defenders

Indicator Code	Indicator name	Score (out of 2)	Explanation
H.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> <ul style="list-style-type: none"> • 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, 45383: rwe.com] • Not Met: Expectation on business partners in value chain to make this commitment • Not Met: Description of how working with HRDs as part of risk assessment and DD • Not Met: Description of how working with HRDs to create safe and enabling environment

I. Labour rights (incl. protection against forced labour)

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.1.PD	Health and safety	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: The Company describes the process(es) it has in place to identify its health and safety risks and impacts: Although the Company describes the organisation of the responsibility and the health and safety system, no evidence was found of the Company describing the process to identify which are its health and safety risks and impacts. [2023 Sustainability strategy report, 2024: rwe.com] & [2023 Annual report, 2024: rwe.com] • Met: Discloses quantitative information on H&S in own operations (injury rate or lost days and fatalities) in last reporting period: The Company indicates that 'in 2023, no fatal accident occurred at RWE. It also indicates that Lost Time Injury Frequency was 1.5 [2023 Sustainability strategy report, 2024: rwe.com] • Met: Expects disclosure of H&S information of relevant business relationships: The supplier contract appendix indicates that 'the Supplier shall provide on RWE's request all information and/or documents which RWE may reasonably demand to verify Supplier's compliance with the obligations of this document, including regular or ad-hoc third party audit reports or certifications, within ten (10) Days following a respective request in writing'. The annex includes a health and safety section. [RWE Human Rights Supplier Contract Appendix, 12/2022: rwe.com] • Met: Targets for H&S performance (including injury rates or lost days and fatalities): The Company reports that 'The key performance indicator established for occupational safety is the number of work-related accidents among inhouse and contract staff on our sites resulting in at least one day of absence for every 1 million work hours (lost time incident frequency – LTIF). The target within the RWE Group was 1.9 in 2023 which we outperformed with an actual figure of 1.5. The LTIF for RWE personnel was 1.1, remaining stable compared to the preceding year'. It also reports that there were no fatal accidents in 2023. [2023 Sustainability strategy report, 2024: rwe.com]
I.2.PD	Forced labour risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Board level oversight over policies on forced labour in supply chain. How relevant stakeholders informed board discussions • Not Met: Capacity building with suppliers • Not Met: Discloses ongoing efforts to prevent and mitigate forced labour in own ops and supply chain • Not Met: Factors to be considered when ending a business relationship incl. responsible disengagement: 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			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.' However, no information was found on the factors the Company considers when deciding to end a business relationship due to non-compliance with forced labour expectations. It is not clear the factors it would consider when deciding whether to end the business relationship if it is not able to adequately use leverage to prevent or mitigate adverse impacts, in the context of forced labour risk management (i.e. relevancy of the supplier, responsible exit). [Policy Statement on RWE's Human Rights Strategy, 45383: rwe.com]
I.3.PD	Prohibition of forced labour: Wage practices	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Requirements on paying in full and on time in supplier codes and contracts • Not Met: Describes work with suppliers on paying workers regularly, in full and on time • Not Met: Assessment scope of failure to pay workers in full and on time in supply chain • Not Met: Employer Pays Principle in policy for own ops and supply chain
I.4.PD	Prohibition of forced labour: Restrictions on workers	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Requirements on free movement in supplier codes and contracts and own operations • Not Met: Describes working with suppliers on free movement of workers • Not Met: Description of implementation and monitoring of this practice
I.5.PD	Freedom of association and collective bargaining	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Commitment on FoA/CB and requirements in suppliers codes and contracts: The Company's policy includes the following commitment: '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. [...] Employees who act as representatives are neither disadvantaged nor favoured in any way. Our employees can openly and regularly exchange views on working conditions with corporate management in unions and workers' representative bodies in accordance with applicable law. At RWE, we will find local solutions that take into account the relevant national legislation and our own guidelines [...] Our conduct and tone towards employees are characterised by respect and fairness. Even in the event of contentious disputes, the aim remains to maintain sustainable constructive cooperation in the long term'. Regarding suppliers, the requirement is similar. No evidence was found, however, of measures in place to prevent and prohibit intimidation or harassment against workers seeking to exercise these rights both in own operations and supply chain. [RWE Human Rights Supplier Contract Appendix, 12/2022: rwe.com] & [Policy Statement on RWE's Human Rights Strategy, 45383: rwe.com] • Not Met: Describes work with suppliers on FoA/CB • Not Met: Assessment of scope of restriction of FoA/CB in supply chain • Not Met: Global Framework Agreement
I.6.PD	Living wage (in supply chains)	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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: rwe.com]</p> <ul style="list-style-type: none"> • Not Met: Describes work with suppliers on living wage • Not Met: Description of process to determine living wages with unions

J. Right to a healthy and clean environment

Indicator Code	Indicator name	Score (out of 2)	Explanation
J.1.PD	Environmental impact assessment and remediation	0.6667	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Conducts EIA 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'. [RWE Biodiversity Policy, 12/2022: rwe.com] • Not Met: Publishes EIA for renewable energy projects: The company state on its feedback that 'Publication of EIAs is obligatory in the EU (our main market), publication is organised via a central database. Therefore, no separate publication by RWE.' We could not identify any information on the company's website. • Not Met: Explains when CIA is conducted
J.2.PD	Life cycle assessment	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Expectation for suppliers to conduct regular public life cycle assessments • Not Met: Requires suppliers to have action plans to address adverse impacts identified

K. Transparency and anti-corruption

Indicator Code	Indicator name	Score (out of 2)	Explanation
K.1.PD	Anti-corruption due diligence and reporting	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to prohibiting bribes to public officials: The Code of conduct states that 'No corruption is tolerated and we take all necessary and appropriate measures to prevent corruption. Conflicts between employees' private interests and the interests of the company are to be avoided'. It also indicates that 'We may not solicit or accept monetary benefits from third parties, nor may we offer or give them to third parties'. No evidence found of an explicit commitment against bribery to public officials (just indicates that benefits to public officials are documented in a Group-wide register). [Code of Conduct, 01/2020: rwe.com] • Not Met: Expectation extends to relevant business relationships • Not Met: Reports on any complaints on corruption and bribery: The Company reports in its German Supply Chain DD act report that 'during the reporting period, no complaints were received via the channels established by RWE that would have substantiated a case'. However, it is not clear if it refers only to the supply chain or to the Company's own operations, including corruption and bribery. [2023 German SC DD Act report, 45413: rwe.com]
K.2.PD	Payments to governments & contract transparency	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Publishing a tax CbCR in line with GRI 207-4: The Company has reported on country-by-country tax, corresponding to the definitions set out in the GRI 204 reporting standards. The Company reports revenues from business transactions with third-party companies, income from internal Group transactions with other tax jurisdictions, and earnings before income tax. [Sustainability Performance Report 2023: rwe.com] & [2023 Annual report, 2024: rwe.com] • Not Met: Disclosure of terms, contracts, agreements for those payments • Not Met: Supports governments to disclose contracts and licenses on renewable energy project in line with EITI • Not Met: Disclosure of payments for land purchase made to governments at project-level

L. Diversity, equality and inclusion

Indicator Code	Indicator name	Score (out of 2)	Explanation
L.1.PD	Diversity, equality & inclusion training for management and employees	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Provides mandatory and regular training as per ILO No 190: The Company states that 'To promote gender diversity, the general rule at RWE is that all leadership and management positions shortlist women in their selection process. Additional initiatives are carried out at the operational level. For example, hiring measures include a variety of one-on-one training courses with the aim of overcoming systemic bias. We raise awareness through campaigns and purpose-designed measures in the fields of personnel development, training, employment and health as well as suitable workplace designs and accessibility'. However, no evidence was found of mandatory, regular, training as per ILO 190 to staff in all types of contracts, on equality, equity, diversity, anti-discrimination. [2023 Sustainability strategy report, 2024: rwe.com] • Not Met: Requires suppliers to provide training • Not Met: Provides materials and access to resources for trainings • Not Met: The trainings include gender-based violence and the Company's policies and mechanisms for addressing it
L.2.PD	Gender balance and sensitivity	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Timebound action plan to integrate gender lens to all relevant documents including on value chain • Not Met: Demonstrates progress through annual reporting • Not Met: Women and non-binary people make up at least 40% of the Company's executives: The executive board has 33% representation of women. The company provided feedback to this indicator but information was not material. [2023 Annual report, 2024: rwe.com] • Not Met: Women and non-binary people make up at least 40% of the Company's board of directors: Seven of out of 20 members of the Supervisory board are women, 35% [2023 Annual report, 2024: rwe.com]
L.3.PD	Gender wage gap reporting	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Has closed gender wage gap or timebound commitment: RWE Generation UK plc, RWE Supply & 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. No further details found during last review. [Gender Pay Gap Results- website, N/A: rwe.com] • Not Met: Reports information at company level across multiple pay bands: RWE Generation UK plc, RWE Supply & 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. No further details found during last review. [Gender Pay Gap Results- website, N/A: rwe.com] • Not Met: Expects business relationships to do the same

JT. Just transition

Indicator Code	Indicator name	Score (out of 2)	Explanation
JT.1	Fundamentals of social dialogue and stakeholder engagement in a just transition	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Public commitment to engage in social dialogue with appropriate parties for purposes of bipartite or tripartite negotiations • Not Met: Discloses the categories of stakeholders it engages with on a Just Transition and how they were identified. • Not Met: Disclosure of steps taken to engage with identified stakeholders and its approach to supporting a just transition. • Not Met: Demonstrates social dialogue and meaningful engagement with stakeholders on all aspects of a just transition.
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"> • Not Met: Demonstrates how it engages in social dialogue, especially with unions and with stakeholders, in the development of its transition planning. • Not Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on workers. • Not Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on affected stakeholders • Not Met: Sets time-bound and measurable indicators to mitigate social impacts of low carbon transition on business relationships.

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> • Met: Public Commitment to create and provide or support access to green and decent jobs, as part of the low carbon transition.: The Company states that 'As a company, we commit dedicated resources to various aspects of social responsibility that impact our workforce, local communities, authorities, and neighbours. These aspects are tailored to the current needs and trajectory of our business sector, whether they are expanding, like renewables, or consolidating, like coal and nuclear. We maintain a broad portfolio of measures and strive for long-term collaboration with relevant stakeholders. Our strategy includes a mix of business-specific and cross-business approaches, enabling us to manage necessary developments and reshape sites and jobs in a socially responsible manner. The fact that we advocate for our employees and try to find socially acceptable solutions for necessary transitions is part of who we are as a company. For us, 'just transition' is synonymous with treating our employees fairly and responsibly'. It also states that 'As per our new plan we will invest € 55 billion in the period from 2024 to 2030 which will enable us to expand our generation capacities to over 65 GW' [2023 Sustainability strategy report, 2024: rwe.com] • Not Met: Assesses and discloses the risk of employment dislocation caused by low carbon transition and related impacts on affected stakeholders. • Met: Demonstrates measures taken to create and support access to green and decent jobs for affected stakeholders.: The Company indicates that 'It is important to provide younger employees, who cannot take early retirement, with prospects within the company or with other employers. Extensive qualification and retraining programmes help employees take on new roles. We are training apprentices working in our lignite and opencast mining business to prepare them for future roles in our renewables business. RWE Power is also taking on the maintenance of wind and PV assets in the Rhenish region, thereby creating more opportunities for its employees'. Regarding other stakeholders it adds that RWE will help job seekers identify new opportunities. The Group is strategically navigating the delicate balancing act of phasing out conventional assets and expanding its renewables business: the existing level of cross-segment collaboration is expected to intensify'. [2023 Sustainability strategy report, 2024: rwe.com] • Not Met: Demonstrates measures taken to ensure green and decent jobs promoting equality of opportunity for women and vulnerable groups
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"> • Not Met: Public commitment to re-and/or up-skills workers displaced by the transition to a low carbon economy.: The Company has commented that it has 'a commitment to support any affected employees and find socially responsible solutions. This covers measures such as e.g. training.' However, no further information is available and no information was found in regard to workers displaced by the transition to a low carbon economy. • Not Met: Disclosure of its process(es) for identifying skills gaps for workers and affected stakeholders, in the context of the low carbon transition. • Met: Demonstrates measures taken to provide re-and/or upskilling, training or education opportunities for relevant stakeholders.: The Company indicates that 'It is important to provide younger employees, who cannot take early retirement, with prospects within the company or with other employers. Extensive qualification and retraining programmes help employees take on new roles. We are training apprentices working in our lignite and opencast mining business to prepare them for future roles in our renewables business'. However, no evidence was found of active measures to promote or conduct training or education opportunities for stakeholders different than the workforce. [2023 Annual report, 2024: rwe.com] • 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.
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"> • Not Met: Discloses contribution to social protection systems for relevant stakeholders, and expectations on business relationships to contribute to social protection of affected stakeholders. • Not Met: Discloses its processes for identifying impacts of low carbon transition on workers' and affected stakeholders' social protection. • Met: Demonstrates contribution to addressing the impact of the low carbon transition on workers' social protection.: The Company indicates that 'Due to our

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>exit from nuclear and coal-fired generation, we will need to cut 9,000 jobs over the short and long term. The announced accelerated phaseout will have significant ramifications for many employees. As before, RWE plans to carry out the personnel adjustment to the new decommissioning roadmap in a socially acceptable manner. For older employees, we are able to offer an adjustment allowance (APG) provided by the Federal government or our partial retirement scheme (ATZ). We plan to provide younger employees, who cannot take early retirement, with opportunities within the company or with other employers'. [2023 Annual report, 2024: rwe.com]</p> <ul style="list-style-type: none"> • Not Met: Demonstrates contribution to addressing the impact of the low carbon transition on affected stakeholders' social protection.
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"> • Not Met: Discloses process(es) for aligning its lobbying activities with policies and regulation supporting the just transition.: The company provided feedback to this indicator but information was not material. • Not Met: Discloses where its lobbying activities do not align with policies and regulation that support the just transition. • Not Met: Discloses action plan addressing misalignment of lobbying activities with policies and regulation that support just transition. • Not Met: Demonstrates lobbying for just transition and regulations enabling green and decent jobs, reskilling and/or social protection

3.a Response to risk of exposure to forced labour (10% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(0).0	Serious risks of supply chain forced labour		<ul style="list-style-type: none"> • Area: Exposure to high risk of forced labour <p>• Story: 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".</p> <p>[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": documents-dds-ny.un.org] [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": ohchr.org] [International Service for Human Rights, "Repository of United Nations recommendations on human rights in China": ishr.ch] [Business and Human Rights Resource Centre, 02/08/2021, "China: Significant proportion of global solar panels produced in Xinjiang"]</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Public commitment to full solar supply chain transparency: In response to the Business and Human Rights Resource Centre 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.' In the 2023 Sustainability Strategy Report the company further states 'we identified a number of relevant risks in our direct supply chain. As a result, we further assessed current and prospective business partners (beyond a certain threshold) in greater detail to gain a deeper understanding of measures taken to safeguard their human rights commitments.' However, the Company's first 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. The statement made in the sustainability strategy report also indicates that the assessment only covered the supply chain to an unspecified tier. [Business and Human Rights Resource Centre, 14/07/2023, "RWE response": media.business-humanrights.org] [2023 Sustainability strategy report, 2024: rwe.com] • Not Met: Publication of verified full solar supply chains
M(0).2	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)	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Steps taken aligned with UNGPs: 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. [Business and Human Rights Resource Centre, 14/07/2023, "RWE response": media.business-humanrights.org] • Not Met: Information relevant to all destination markets

3.b Serious Allegations (10% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(1).0	Serious allegation No 1		No allegations meeting the REB severity thresholds under this heading were found

4. Low-Carbon Transition Assessment (20% of total)

Indicator Code	Indicator name	Score (%)	Explanation
n/a	Emissions targets	100%	<ol style="list-style-type: none"> 1. Has the Company set and disclosed a Scope 1+2 short term target? Yes. "In the near term, specifically by 2030, RWE aims to reduce its Scope 1 and 2 GHG emissions from power generation by 71.1 % per MWh, relative to the 2022 baseline." [Source: https://www.rwe.com/en/investor-relations/financial-calendar-and-publications/reporting/, p. 116] 2. Has the Company set and disclosed a Scope 1+2 long term target set? "In the long term, specifically by 2040, RWE aims to reduce its Scope 1 and 2 GHG emissions from power generation by 98.3 % per MWh, relative to the 2022 baseline." [Source: https://www.rwe.com/en/investor-relations/financial-calendar-and-publications/reporting/, p. 116] 3. Is the Scope 1+2 short term target aligned with a net zero emissions scenario? Yes. See above.

Indicator Code	Indicator name	Score (%)	Explanation
			<p>4. Is the Scope 1+2 long term target aligned with a net zero emissions scenario? Yes. See above.</p> <p>5. Has the Company set and disclosed a Scope 3 short term target? Yes. See above.</p> <p>6. Has the Company set and disclosed a Scope 3 long term target? Yes. See above.</p> <p>7. Is the Scope 3 short term target aligned with a net zero emissions scenario? Yes. See above.</p> <p>8. Is the Scope 3 long term target aligned with a net zero emissions scenario? Yes. See above.</p>
n/a	Share of Low Carbon CAPEX	94%	<p>"In the 2024 fiscal year, 94 % of our capital expenditure was taxonomy-aligned (previous year: 89 %), meaning that it was allocated to projects classified as sustainable according to the EU Taxonomy Regulation. This percentage is based on total investments of €12,017 million." [Source: https://www.rwe.com/en/investor-relations/financial-calendar-and-publications/reporting/, p. 50]</p>
Final score		97%	

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* are not included for this year's Benchmark. As such this scorecard should be seen as a reflection of feedback received as of April 2025.

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 2025 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 project developers 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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* Cut-off dates: 31 January 2025 for companies that did not engage with the benchmark; the expiration of the feedback period (25 April 2025) for companies that engaged with the benchmark and provided additional documents published during that period.

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