



MVV Energie's Human Rights Policy

Unconditional commitment to human and personality rights

We are aware that, on account of its business activities, MVV may directly or indirectly touch on human rights-related topics or be able to influence such.

For MVV, human rights are unconditionally and universally applicable, even when they are not explicitly laid down in national legal systems.

In terms of the definition of human rights, MVV refers to internationally recognised human rights norms, conventions, principles and guidelines, which include the International Bill of Human Rights of the United Nations (UN), the OECD Guidelines for Multinational Enterprises, the United Nations Guiding Principles for Business and Human Rights, and the Core Labour Standards of the International Labour Organization (ILO). As a member of the UN Global Compact, we are committed to:

- Respecting and enforcing human rights
- Promoting compliance with human rights in our own sphere of influence and ensuring that no human rights abuses are caused, supported or tolerated due our own business activities
- Working towards the elimination of all forms of forced labour and child labour
- Upholding the freedom of association and the effective recognition of the right to collective bargaining, as well as ensuring compliance with internationally recognised work safety standards at our company and, wherever possible, at our suppliers as well
- Eliminating all forms of discrimination in respect of employment and occupation
- Protecting the health and safety of employees and relevant stakeholders
- Respecting further human and personality rights-related topics, such as land distribution and use, the right to water, the right to property, the right to education, data protection and privacy protection.

Our management approach

We are continually working to systematically identify the implications of our business activities for human and personality rights and to further reduce the likelihood of potential human rights abuses. To this end, we maintain an open dialogue with our stakeholders. This enables us to be aware of and take due account of their legitimate expectations.

On group level, human and personality rights are subject to regular and systematic evaluations (due diligence) in the context of our sustainability, risk and compliance management system. Where necessary, key action points and measures are initiated. Furthermore, existing processes to respect human rights and identify potential risks are regularly reviewed and, where necessary, developed further.

Direct responsibility for these activities lies with the management of our companies and locations. Individual group companies may devise specific local approaches to facilitate and promote ongoing improvements.

Our business activities are predominantly located in the EU or other OECD countries where human and personality rights are firmly anchored in national legal systems and supplemented by basic rights, and which thus significantly exceed the minimum standards stipulated by the UN and ILO. The commitment to human and personality rights is so firmly anchored at MVV that we do not believe that explicit training on



this topic is necessary for the majority of our employees. However, the communication of our objectives in this respect does form part of our compliance management system.

Acquisitions of companies or shares in companies are subject to a careful due diligence process which also addresses compliance with human and personality rights.

Suppliers

We also expect our business partners to respect and comply with human and personality rights. Suppliers to MVV are required to meet high minimum requirements in terms of sustainability. They are selected on the basis of various conventions of the United Nations, the ILO, the OECD and the UN Global Compact on basic human and personality rights concerning the elimination of child labour, the freedom of association and collective bargaining, working conditions, equal pay, health, safety and business ethics. Furthermore, we have set ourselves the objective of raising awareness among suppliers for social and employment law-related issues. Compliance with social standards also forms part of our supplier evaluations, contract assignment talks and supplier development processes.

Corruption

MVV is aware that corruption presents a substantial obstacle to economic and social development throughout the world and that corruption has a significant negative impact on progress in general and on local communities in particular.

We accord absolute priority to identifying and preventing potential acts of corruption and thus to protecting the integrity and reputation of our company. MVV shows zero tolerance towards acts of corruption.

MVV has implemented effective mechanisms to monitor the effectiveness of the group's anticorruption and anti-bribery measures. With our compliance management system, we have undertaken to proactively combat all kinds of corruption. A compliance manual provides clear guidance to our employees in this respect.

To enhance our employees' awareness of this topic, corruption also forms a regular component of our ongoing compliance training measures.

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