



Policy Statement

Human Rights Strategy

A dark blue background with a network of lighter blue lines and dots, creating a sense of connectivity and technology.

Human
Rights
Strategy

Our Core Standards and Guidelines

We respect and support internationally recognized human rights across all our business activities, in accordance with the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.

We acknowledge the impact of our operations on the environment, which might create adverse impacts on human rights if not addressed correctly. For this reason we strive to prevent and mitigate adverse human rights impacts that have a direct link to our operations, products or services.

We expect our business partners to do the same as we strongly believe that our responsibility does not end at our own gate but applies to our Suppliers.

We have laid down our core expectations of our Suppliers in this regard in our [Code of Conduct for Suppliers](#), applicable as an integral part of all business relationships. Our core expectations of our employees on business ethics are defined in the [Uniper Code of Conduct](#).

More specific commitments, targets and indicators are defined in this and various other company policies and statements, including the [HSSE and Sustainability Policy Statement](#) and the [Sustainability Strategic Plan](#).

Our Commitments at a glance

Work

- We reject all forms of child, compulsory or forced labor.
- We respect labor rights and ensure a safe, healthy, and secure work environment for all employees and contractors; we promote the same standards in our joint ventures and partnerships.
- We recognize the rights of freedom of association and freedom of peaceful assembly, including the freedom to engage in collective bargaining and participate in works agreements in various countries.

Prevention of Discrimination

- We do not tolerate any form of discrimination or harassment of any kind.
- We promote diversity, equity, and inclusion to achieve equal opportunity among all employees and a more balanced representation of minorities and underrepresented groups in the workforce.

Communities

- We minimize the impact on communities affected by our operations, we strive to prevent pollution and ensure a responsible use of natural resources.
- We commit to a just and fair transition, supporting our people in communities challenged by our plans towards climate neutrality.

Suppliers

- We regularly screen our supply chain for Environmental, Social and Governance-related (ESG) risks, including human rights risks, and collaborate with our Suppliers and other stakeholders to define mitigation measures.

Risk Management System and Risk Analysis

To fulfill our Human Rights Strategy we established a continuously improving ESG Risk Management System to identify, prevent or minimize the risks of human rights violations and damage to the environment.

Human rights risks are identified and assessed using a range of tools and analysis, as well as internal and external benchmarks, in relation to the types of goods, the countries of origin of the relevant raw material, the information provided by the authorities or independent reports of poor human rights records in the region of origin. We also take into consideration relevant information on direct as well as indirect suppliers.

Based on our risk analysis, we have identified several potential human rights and environment-related risks connected to certain suppliers and specific locations. We have currently identified impacts on ecosystems, biodiversity and communities as the most common issues raised. Allegations of corporate complicity in human rights abuses, as well as employment-related issues such as freedom of association, discrimination and poor occupational safety rank as the second group of most common risks across our supply chain. Prevention measures and mitigation actions include, but are not restricted to, the implementation of adequate and effective controls, agreeing on an appropriate contract clauses, avoiding or reducing specific actions and options, or transferring the risk and ensuring effective legal coverage. As last resort, termination or suspension of contracts in specific cases where a supplier shows continued lack of progress, no engagement or continued severe human rights impacts in connection with the respective business relation. ESG risks are continually monitored and reported to the relevant internal stakeholders to enable further measures to be taken if appropriate within our operations and along our supply chain. Risk monitoring is performed on a quarterly basis to challenge the assessment and effectiveness of measures. This ensures the risks remain relevant and managed as effectively and efficiently as possible.

Complaints Procedure

To allow a transparent approach and communication of any grievance, Uniper has set up a complaints procedure that is further described in the [Business Directive Whistleblowing Procedure](#). The Whistleblowing procedure allows anyone who is directly affected, as well as anyone who is aware of potential or actual violations as described above, to report risks and violations that have arisen as a result of our economic actions in our own business area or of a direct supplier to our specific whistleblowing channel at whistleblowing@uniper.energy. Alternatively, if employees, suppliers or other persons affected are not comfortable reporting a matter internally and wish to remain anonymous or feel as though no action has been taken regarding a matter they have already reported, they may contact our external independent whistleblower hotline operated by the law firm Simmons & Simmons and available at: uniper-compliance@simmons-simmons.com. Each report received will be treated with confidentiality as employees, who report potential rule violations in good faith, benefit from special protection according to the principles of our Code of Conduct and the corresponding Business Directive Whistleblowing Procedure. Underlying guarantees of this directive are confidentiality, non-retaliation and adherence to the applicable data protection laws. From 2023 onwards an Enhanced Due Diligence exercise will be performed in case we receive human rights related grievances regarding our operations or suppliers. In case a claim is considered as related to an active Supplier, the claim will be jointly investigated with Legal & Compliance. The claimant will be notified about the decision to investigate the claim or not.

Responsibilities & Reporting

The Uniper Human Rights Officer (EVP Sustainability & HSSE) ensures an effective management of the human rights and environment-related risks as described above and has a regular and direct reporting line to the Uniper Board of Management, which bears the overall responsibility for Uniper's Human Rights Strategy and ESG Risk Management.

The Human Rights Officer monitors the specific engagement strategies with individual relevant suppliers, in cooperation with the business functions having ongoing commercial relationships with such suppliers. A dedicated cross-functional committee regularly reviews the ESG risk identification, assessment and management activities. The most significant issues are reported to the Uniper Risk Committee, composed by members of the Board of Management. When disengagement is recommended, the issue is presented to the Uniper Risk Committee for decision.

Moving forward, we are aware that these topics require processes that shall be constantly adapted and further developed. With this in mind, we report on the progress in the implementation of our Human Rights due diligence obligations in our annual Sustainability Report. Also, we are going to provide an annual report to the Federal Office for Economic Affairs and Export Control as required by the German Supply Chain Act.

Düsseldorf, January 2023



Klaus-Dieter Maubach - CEO



Niek den Hollander - CCO



David Bryson – COO



Tiina Tuomela - CFO