



# Code of Conduct

Uniper SE  
Holzstraße 6  
40221 Düsseldorf  
Germany

Effective from October 1, 2017  
Revised edition August 2023

# Table of contents

<b>Introduction</b>	<b>4</b>
<b>Importance of the Code</b>	<b>6</b>
<b>Our People</b>	<b>10</b>
We promote diversity, equity and inclusion	12
We ensure a safe, healthy and secure work environment	14
<b>Our Business</b>	<b>16</b>
We avoid conflicts of interest	18
We only offer or accept gifts and hospitality when appropriate	20
We comply with the laws against money laundering or terrorist financing and with all applicable sanctions regimes	22
We do not trade on inside information	24
We compete fairly	26
We protect our assets and use them wisely	28
We keep and provide accurate and clear business records	30
We only act on behalf of the company when authorized	32
<b>Our Communities</b>	<b>34</b>
We are committed to human rights	36
We care about the environment	38
We support the development of our communities	40

# Welcome to our Code of Conduct.



Being a role model starts from the top.

Our Code establishes the basic principles of conduct that everyone at Uniper must follow. It reflects our commitment to one another, to our business and to our communities. This Code is a compass to guide our decisions and, in particular, to help us to do the right thing when difficult situations arise.

We are a global company doing business across the world. We always comply with the law, but, if we want to be trusted and respected, we need to do more. We need to operate with the highest ethical standards and put them into practice every day, in everything we do, and everywhere we do business. Despite the challenges and difficulties that we might face in our daily work, we must always do the right thing.

Everyone at Uniper must read, follow the Code and apply its principles to their daily work. Failure to do so will put Uniper and our people at risk. If you have any questions or concerns regarding the Code, please share them. Speak up. The Code will explain how you can do so.

Uniper's success and reputation depend on each of us. We all have the opportunity and responsibility to protect and maintain our reputation.

At Uniper, we live with integrity. We always do what is right.

Uniper Board of Management

Michael Lewis

Dr. Jutta A. Dönges

Holger Kreetz

Dr. Carsten Poppinga

## Importance of the Code

Our Code is built on basic principles of conduct that give us the guidance and support we need to conduct business in compliance with the law and internal rules. It is about “living integrity” and acting in a trustworthy manner toward our business partners. Being part of Uniper means being committed to the Code.

Not following the code is considered misconduct and may result in disciplinary action or sanctions under labor law (including dismissal) and other legal sanctions. Particularly strict standards will be applied when assessing the conduct of line managers and board members.

## Who must follow the Code?

Everyone at Uniper must follow the Code. This includes all employees, managers and board members of any Uniper Group company.

If you are a line manager or board member you have additional responsibilities under the Code. You must:

- Lead with integrity.
- Ensure that your team members are familiar with the Code and support them with any integrity question or concern they might have. Most importantly, encourage them to speak up.
- Support any compliance activities in Uniper.

If you are member of the Leadership Team (L1-L2) or a board member, you must additionally confirm in writing to your immediate supervisor at the end of each year that you, and those in your area of responsibility, have complied with the Code.

Although third parties are not subject to our Code, we should work, if feasible, with third parties whose principles are comparable to ours.

[Supplier Code of Conduct](#)

## Follow the law or the Code?

Uniper does business across the world, and it is not possible for the Code to cover all the requirements of the different laws and regulations that apply to our business. That is why it is important for all of us to be familiar with the laws and regulations applicable to our roles.

To be clear, we must always comply with all legal requirements. However, where our Code sets a higher standard than applicable laws, we adhere to the Code. In cases of doubt, please contact Compliance.

If you encounter a situation that is not covered by the Code, use your common sense and the flow-chart below.

**Not sure? Ask for help.**



**No, don't proceed.**

# Speak Up

We are all responsible for protecting Uniper's integrity and reputation. We are all responsible for speaking up, whether it is a question about the Code or non-compliant behavior.

If you become aware of any violation or potential violation of the Code, please report it. This enables us to address the situation and take the necessary action. If you report it, we can deal with the critical situation and adopt the necessary measures. If you do not speak up, we cannot prevent harm being caused or learn any lessons.

All reports will be taken seriously, investigated thoroughly and handled confidentially.

---

## How can a violation or potential violation be reported?

### Internal Whistleblower Hotline

Reports on potential rule violations within the company may be directed to the Uniper Compliance Whistleblowing Team at our specific whistleblowing hotline [whistleblowing@uniper.energy](mailto:whistleblowing@uniper.energy).

### External Independent Whistleblower Hotline

Alternatively, if employees are not comfortable reporting a matter internally and wish to remain anonymous, they may contact our external independent whistleblower hotline operated by the law firm Simmons & Simmons and available at [uniper-compliance@simmons-simmons.com](mailto:uniper-compliance@simmons-simmons.com).

Our Compliance Whistleblowing Team and the operators of our external whistleblowing hotline are not bound by instructions, they are independent and bound to secrecy.

Both ways of reporting are equally available to all third parties.

---

## You will be protected

We are expected to speak up, but it is also our duty to make sure that nobody suffers any consequences for reporting in good faith or for supporting a compliance investigation.

If you know of someone who is suffering consequences for reporting, please contact Compliance.

If you suffer any retaliation, disadvantage or ill-treatment (e. g. being ignored, being mobbed) as a result of your report, it will be taken very seriously and investigated and the appropriate action will be taken.

[BD Whistleblowing Procedure](#)

A photograph of three diverse professionals standing in a modern office hallway with large windows. On the left, a man with a beard and glasses, wearing a grey sweater over a plaid shirt, holds a tablet. In the center, a woman with curly hair, wearing a light blue blazer over a dark top, has her hands clasped. On the right, a man in a light-colored button-down shirt and dark trousers holds a blue folder. All three are wearing blue lanyards with ID badges. A blue semi-transparent overlay covers the bottom left portion of the image, containing text.

# Our People

We promote diversity, equity and inclusion

We ensure a safe, healthy and secure work environment

## We promote diversity, equity and inclusion

At Uniper, we promote diversity, equity and inclusion (DEI) because we understand that it is key to our personal wellbeing and success – individually and as a company.

By embracing diversity, living inclusion and fostering equity, we at Uniper make success possible and boost our business both for today and in the long term. It's only when everybody can fulfil their full potential unhindered, that Uniper can reach its full potential.

We see diversity, equity and inclusion as a long-term goal that can only be achieved if top down commitment and engagement are ensured, and expected improvements described and measured on a yearly basis.

The Uniper Board has adopted a DEI strategy that will help us to achieve a more balanced representation of employees, reach goals such as creating meaningful opportunities for all employees reflecting their individual situations and phases in life, and a top industry position in DEI rankings. The DEI strategy is steered and driven by Uniper's DEI Council, a senior leadership committee from different business functions.

- [DEI strategy](#)
- [DEI Council](#)

Since 2016, Uniper is an active member of the German Diversity Charter (Charta der Vielfalt), a corporate initiative to promote diversity at companies and institutions in Germany.

We are committed to the principle of equal opportunity for all employees, regardless of gender, color, race, national or ethnic origin, religion or worldview, disability or other status such as age, marital and family status, sexual orientation and gender identity, economic and social background, or any other protected characteristic.

We have **zero tolerance** for discrimination, harassment, mobbing or intimidation in any form, whether it be physical, verbal or non-verbal. This can include offensive remarks, jokes, insults as well as other visual, non-visual, graphic, electronic or physical conduct that could create an offensive, intimidating or hostile work environment.

Sexual harassment can occur between members of the same or opposite sex and includes any unwelcome sexual advance, request for sexual favors or other obvious or subtle conduct of a sexual nature.

## What we do

- **Value the diversity at Uniper.**
- **Become aware of our own unconscious bias and learn how to overcome it.**
- **Use inclusive communication, meaning we share information in an accessible and understandable way for all.**
- **If we experience or become aware of any discriminatory behavior, we consult our line manager, Human Resources, Compliance, the Works Council or use our internal or external whistleblower hotline.**

## What we don't do

- **Discriminate.**
- **Allow any protected characteristic to influence our hiring or employee-development decision.**
- **Committ acts or threats of harm or violence.**

**“One of my colleagues is constantly making offensive remarks about someone in our team. What should I do?”**

An inclusive workplace environment where everybody feels safe is important to us at Uniper. Using language or communicating in any way that is disrespectful toward another person's race, religion, sexual orientation, or any other characteristic is not acceptable. If you feel you can explain your concerns to your colleague, please do so; if not, consult your line manager, Human Resources, Compliance or the Works Council; if you do not feel comfortable to report the matter internally, you may also use our external whistleblower hotline.



## We ensure a safe, healthy and secure work environment

At Uniper, 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 want to make sure that every employee returns home at the end of the day without any injury. We are committed to providing a safe and secure workplace, preventing accidents and injuries, and minimizing any health risks associated with our workplaces.

We look after people, so we support our employees by providing health-management services. These include occupational health support, health promotion (including both physical and mental health) and support in the workplace for employees with disabilities.

Making sure that we have a safe, healthy and secure workplace is a shared responsibility and it is a way in which we show our respect for ourselves and those around us.

Therefore, please report all accidents, near-hits or observations and security incidents so we can learn from them and prevent future incidents.

## What we do

- Comply with all applicable health and safety laws, policies and procedures, including completing and keeping up-to-date all relevant training.
- Encourage stringent occupational safety regulations, such as those regarding work time and conditions.
- Actively challenge unsafe behavior.
- Follow Uniper's three site security rules: Wear ID, secure valuables and report all accidents, near-hits or observations and security incidents.

## What we don't do

- Carry on with work that becomes unsafe or potentially damaging to health.
- Put ourselves or our people at physical security harm.
- Perform any work or related activity (such as driving to work) under the influence of drugs or alcohol.

**"Someone suggested that we could save time and money on a big project by relaxing our safety standards. Should we?"**

At Uniper, we only work safely. Of course, this means different things in different work situations. There is always an opportunity to review work plans, schedules and risk assessments to optimize how a project is delivered. But relaxing safety standards will not yield savings if there is a major injury to a colleague or contractor as work will be stopped and investigations will follow.







# Our Business

We avoid conflicts of interest

We only offer or accept gifts and hospitality when appropriate

We comply with the laws against money laundering or terrorist financing and with all applicable sanctions regimes

We do not trade on inside information

We compete fairly

We protect our assets and use them wisely

We keep and provide accurate and clear business records

We only act on behalf of the company when authorized

## We avoid conflicts of interest

We make all business decisions based on what is in Uniper's best interest. Therefore, any situation in which your personal interest or relationship interferes, or might interfere, with Uniper's interests is a conflict of interest and must be avoided. Some common conflicts of interest are addressed below.

### Doing business with spouses, partners, relatives or friends

Even if you do your best to remain objective in your business dealings, close ties raise special concerns. Promptly disclose to your line manager or Compliance any personal situation that creates or appears to create a conflict of interest and remember that, unless authorized, you must not act on behalf of Uniper if the transaction involves your spouse, partner, relatives or close friends.

### Outside investments

You cannot own, directly or indirectly, a significant financial interest in a company that does or wants to do business with Uniper or our competitors.

A significant financial interest is an ownership or financial interest that allows you to influence or, from a third party's perspective, has the potential

to influence the success of that business or Uniper's relationship with that business. Uniper would generally consider an ownership greater than one percent as significant.

You should not take personal advantage or business opportunities that are discovered or presented to you through your use of Uniper's information. You may only pursue such opportunities if you have received authorization from Compliance.

### Secondary employment

Secondary employment outside Uniper requires prior notification of Human Resources. Secondary employment with one of Uniper's business partners or any party you are in contact with in the course of your work for Uniper requires prior approval from Human Resources. Human Resources must obtain the consent of the relevant Compliance Officer before issuing its approval.

## What we do

- **Keep business and personal interests separate.**
- **Are transparent. We disclose in full any potential conflict of interest to our line manager so that it can be properly assessed and the right action is taken to remove or mitigate the conflict.**
- **Do not take advantage of business opportunities that arise in our work for Uniper for personal gain.**
- **Notify Human Resources of any secondary employment and obtain their approval if the employment is with one of Uniper's business partners or any third party which we are in contact with through our work for Uniper.**

## What we don't do

- **Conceal any personal situation that can be considered or perceived as a conflict of interest.**
- **Create situations in which our personal interests may conflict with Uniper's interests.**

**"I have developed a close friendship with a supplier. We are thinking about entering into a partnership in a business that is not related to Uniper. Do I need to disclose it?"**

Yes, you do. Although the partnership would not compete with Uniper, you need to disclose it to avoid even the perception of a conflict of interest. Please report it to your line manager or Compliance.



## We only offer or accept gifts and hospitality

### when appropriate

Corruption promotes poverty and crime, undermines confidence and increases the cost of transactions. Corruption typically occurs through bribes and kickbacks.

We do not engage in any type of corruption, whether dealing with public officials or the private sector. Therefore, we do not offer, promise, or give anything of value (such as money, gifts, offers of employment or other benefits) to win business or to influence any action or for any other advantage, especially to any public official. It is also prohibited to do so indirectly through a spouse, partner, relative, or friend.

Intermediaries (including any type of agents, advisors, representatives, etc.) are often used as a vehicle for corruption. We only use intermediaries in accordance with our [Business Policy Intermediary Agreements](#), ensuring that the intermediary's fee or commission will not be used to make illegal payments on our behalf.

#### Gifts and hospitality

Offering or accepting gifts and hospitality can be appropriate and a common business practice. However, it is not appropriate to accept gifts or hospitality where the intention is to improperly influence a decision, or when doing so might create the perception of such intent. When offering and accepting gifts or hospitality we must use good judgement and moderation.

[Gifts & Hospitality Register](#)

- Business meals or conferences are generally considered appropriate where there is a justifiable business purpose, they are infrequent and under reasonable circumstances, and only if consistent with Uniper's interests.
- Gifts or invitations for entertainment or of a social nature, rather than a prevailing business character, may be a threat to the independence of a subsequent business decision. We take care to avoid the mere appearance of any potential negative impact on our reputation.
- Bribing a public official is a crime in all countries. We never offer anything to public officials in exchange for a public service.

For the protection of individual employees and the whole Uniper organization, certain situations require prior approval by a line manager or Compliance.

Use the Gift and Hospitality Register in order to register gifts and hospitality.

If there is any doubt as to the appropriateness of any action we consult our Line Managers.

## What we do

- Act independently and objectively in our business dealings, whatever the occasion, to ensure Uniper's reputation is not negatively impacted.
- Are extra cautious when doing business in countries with a significant corruption risk.
- Immediately inform Compliance if bribes or kickbacks are offered or requested.
- Take extra care when using intermediaries.
- Pay our own travel expenses and accommodations.
- Generally, we do not involve spouses, partners or children, when making or accepting invitations or any other benefit.

## What we don't do

- Grant or accept cash during any business activities.
- Grant "facilitation payments" in order to speed up the performance of public officials.
- Use our private address when exchanging gifts or making and accepting invitations.
- Offer or receive gifts and benefits that:
  - Violate any law, regulation or policy (Uniper's or the recipient's).
  - Are excessive, luxurious or inappropriate.
  - Could be construed as a kickback or bribe.

#### Who is a public official?

Managers and employees of companies owned or controlled by the state, government or municipalities in some countries are considered public officials. If unsure whether an individual is a public official, ask Compliance. The definition may differ from country to country.



## We comply with the laws against money laundering or terrorist financing and with all applicable sanctions regimes

We are committed to conducting business only with customers involved in legitimate business activities, with funds derived from legitimate sources. We support regulatory and law-enforcement authorities.

We do not participate in or facilitate money laundering and we comply with anti-moneylaundering and anti-terrorist laws, regulations and company policies.

- Money laundering is generally defined as the process of hiding the source of money made through criminal activities by channeling it through legitimate transactions.
- Terrorist financing means the provision of funds for terrorist activity. Funds might be raised from legitimate sources (such as business dealings) or from criminal sources (drug trade, extortion, etc.).

We must make sure that we know who we are dealing with before entering into any transaction to avoid being used to launder money or finance terrorist-related activities.

### What is a sanction?

It is a trade restriction that aims to contribute to the foreign policies of a country or supranational entity. It may prohibit all commercial activity or it may target a specific government entity, business, activities or individuals.

It usually includes restrictions on:

- Commercial activity with certain industry-sectors, businesses or specific individuals.
- Financing transactions or making funds available to a sanctioned country or its designated businesses or individuals.
- Travel to or from a sanctioned country.

- [BP Know Your Counterparty](#)
- [BP Economic Sanctions](#)

## What we do

- Deal with clients involved in legitimate businesses with funds derived from legitimate sources.
- Stay alert and report any suspicious transaction to our line manager or Compliance.
- Understand and comply with the sanctions regimes that may apply to us and to our business area.
- Make sure that the applicable Know Your Counterparty procedure and Compliance checks are carried out before starting any business dealings.

## What we don't do

- Engage in any activity that we suspect might be related to money laundering or terrorist financing.
- Make or accept any cash payment.
- Fail to check if sanctions are applicable to our business activity (changes in sanctions can affect new business developments as well as current activities)
- Deal with any embargoed country or blocked person.
- Fail to report any suspicion of a potential violation of sanctions.

### Red flags

Be alert to suspicious situations that may indicate potential money-laundering activities, such as:

- Counterparty who are unwilling to provide business-related information.
- A single invoice that is paid in multiple tranches.
- Payments using large amounts of cash or cash equivalents.
- Invoices that are required to be paid into an account that is not the normal business-relationship account or in a country different from the place of incorporation or operation.



## We do not trade on inside information

Uniper promotes fair and sustainable securities trading. With respect to inside information, we comply with national and international regulations governing the capital markets.

Simply put, inside information is any information of precise nature about a company that is not publicly known and that, if it became publicly known, would likely have a significant effect on the price of the company's stock.

Recommend another person to engage in insider dealing and sharing disclosure of insider information about Uniper or another company to anyone either inside or outside the company ("stock tipping") is also prohibited.

Remember, even the appearance of an improper transaction must be avoided.

The prohibition of insider trading is also applicable to our commodity-trading activities. If you are employed in the commodity-trading business you should be familiar with your functional policies, which might place additional obligations on you.

- [BP Preventing Insider Trading](#)
- [BP MAR Framework](#)

## What we do

- **Keep inside information confidential at all times (even within Uniper).**
- **When trading securities, make sure that we are not in the possession of inside information and observe trading-window restrictions.**
- **If in doubt, consult the Corporate Legal Affairs within Legal & Compliance.**

## What we don't do

- **Never make any investment decisions, related to Uniper securities or any other company's securities, based on insider information.**
- **Never recommend or suggest that anyone else buy or sell Uniper or another company's securities while in possession of inside information.**
- **Never engage in market manipulation.**

### What are examples of inside information?

Inside information may be present in:

- Forecasts or financial results/financial figures
- Dividend announcements.
- Major organizational changes.
- Acquisitions, divestments, mergers.
- Significant management changes.

Provided, in each case, such information is precise not public and is significantly relevant for the stock price.



## We compete fairly

We are committed to competing in full compliance with all applicable competition laws (anti-trust/fair dealing). All employees, and especially those who are involved in marketing, sales and purchasing, or who are in regular contact with competitors, must obey competition laws as described in the Competition Law Guidelines.

Competition law is designed to promote competition with the aim to achieving lower prices, higher quality, greater choice and encouraging innovation. The law therefore prohibits agreements that restrict competition, such as price-fixing, market or customer allocation, market sharing or bid rigging with competitors, and the abuse of a dominant position in the market. Competing fairly also means that we do not make false claims or comparisons about our competitors.

Failing to comply with these rules may lead to severe fines, damage claims, reputational harm or the unenforceability of contracts. Infringements will not be tolerated and may result in sanctions against the persons concerned.

## What we do

- **Make independent decisions about prices, customers, or when participating in a tender.**
- **Check the Clearing Office Guidelines on Ping before contacting a competitor and, when required, contact [clearingstelle@uniper.energy](mailto:clearingstelle@uniper.energy)**
- **Familiarize ourselves with the Competition Law Guidelines. If in doubt, contact the Energy Law and Regulation Team.**

## What we don't do

- **Make formal or informal agreements with competitors to fix or set prices or allocate products, markets, territories or customers.**
- **Coordinate decisions on whether and how to participate in a tender.**
- **Exchange competition-sensitive information, unless approved by the Clearing Office.**

**“At a conference about energy trends, I’m meeting with a former colleague who works for a competitor now. We want to have dinner to catch up and discuss what we have learned today and its impact on our companies. Is that okay?”**

You are allowed to catch up on personal matters and discuss general political or legal developments. However, you must not share information about Uniper’s prices, customers, strategies, and so forth or receive similar information about a competitor or other business partner. Ask yourself if you could publish such information in a newspaper. If not, exchanging such information is improper.

- [Competition Law Guidelines](#)
- [Guidelines Clearing Office](#)



## We protect our assets and use them wisely

We are expected to use Uniper's assets and resources only for legitimate business and to safeguard them from harm, attack, theft, loss or abuse.

Assets include, among others: energy sources and generation plants, transport and storage facilities, company funds, confidential information, intellectual property, information systems (computers, mobile phones, and so forth), plant and equipment.

Data protection and Information Security are core interests of Uniper to ensure the confidence of our employees, customers and suppliers. Policies and procedures regarding the processing of personal data have to be in compliance with General Data Protection Regulation and the local equivalents. Additionally, Uniper is committed to the principles of transparency, the condition of necessity of the data and data minimization. Therefore, Uniper set up policies for the processing of personal data.

We also apply this principle to the assets of third parties. We believe that the same respect we have for our own assets should be used when dealing with a third party's assets.

## What we do

- **Take all reasonable steps to protect company assets, especially information systems, and report any abuse or misappropriation by others.**
- **When spending Uniper's money, make sure that we are always responsible and that we act in Uniper's best interest.**
- **Comply with Uniper's policies on data protection, information security and travel expenses.**
- **Operate our physical assets safely, responsibly and in compliance with all applicable laws and regulations.**

## What we don't do

- **Use company assets for a personal gain.**
- **Damage, misuse or misappropriate the assets of others.**
- **Accept, disclose or use information that was disclosed in breach of a confidentiality agreement.**
- **Install on a company mobile or laptop applications or software not approved by IT.**

### How do I handle files, documents and removable media properly?

We distinguish between four levels of confidentiality:

- **Public:** Information that is intended for the general public.
- **Internal:** Information that has been produced internally in the course of normal business operations.
- **Confidential:** Information whose disclosure to unauthorized parties would have a significant negative impact on our business (such as customer or HR data).
- **Strictly confidential:** Information whose disclosure to unauthorized parties would jeopardize the existence of Uniper units or the energy supply to the population.



## We keep and provide accurate and clear business records

Accurate business records are essential to managing a successful company as well as meeting our regulatory and legal obligations.

As a public company, we have a responsibility to prepare our financial statements and make full, accurate and timely public disclosures in compliance with the law and accounting standards. If you are employed in finance, tax or treasury, accounting and controlling functions, you should review your functional policies, which might have additional obligations on you.

## What we do

- Ensure that all data we create, whether financial or not, are accurate and reflect the transactions covered.
- Cooperate fully with internal and external audits, as well as authorities.

## What we don't do

- Alter, conceal or falsify business records.
- Submit misleading business records.
- Interfere with or try to influence an audit.

### **"Why is it important to make and keep financial and business records in reasonable detail?"**

The publication of incorrect financial statements leads to a subsequent correction and disclosure of such. The corresponding reporting can ultimately lead to a loss of confidence in the information communicated and thus also in Uniper.

Further consequences are also conceivable. For example, liability for damages on the part of members of the Board cannot be ruled out. At the same time, the incorrectness of financial statements can lead to a breach or invalidity of contractual agreements.





## We only act on behalf of the company when authorized

### Communications

We are committed to making sure that all the information we communicate is accurate and complete. This is vital, because everything we do or say has an impact on our reputation. Unless you are authorized to speak on behalf of Uniper, any media enquiry needs to be referred to the Corporate Communications Team.

Communications with investors are managed by the [Investor Relations Team](#).

### Authorization

You may only sign documents or otherwise represent the company if you are specifically authorized to do so. The Delegation of Authority (DoA) for all Uniper employees is exclusively governed by the Delegation of Authority Business Policy. Authority can be granted by either the Delegation of Authority Business Policy, Function DoA or Individual Authority. If you are authorized, you are to observe the limits of your authorization especially in terms of value limits and with respect to which Uniper company you are allowed to represent.

## What we do

- Ensure we are authorized to represent Uniper externally before doing so.
- Check our internal and external limits of authority before deciding on a specific task and/or signing legally binding correspondence.

## What we don't do

- Express our personal views as those of Uniper when in public, especially when using electronic communication, such as social media.
- Sign documents that we are not authorized to sign.
- Forget to apply the four-eyes principle.

### "I have been approached by a reporter to talk off the record about different topics that are related to Uniper. Is there any issue?"

There are lots of risks (legal, regulatory, financial, and so forth) for Uniper and yourself when you talk to the media on behalf of Uniper. Do not make any statements, whether online (social media), through public speaking or by any other means if you are not authorized to do so.

[BP Delegation of Authority](#)



A photograph of two men in a modern office setting. The man on the left is Black, wearing a blue sweater over a white collared shirt. The man on the right is white with grey hair, wearing a light blue button-down shirt and dark trousers. They are both looking down at architectural plans or blueprints spread out on a table. The background shows a multi-story office building with balconies and large windows. A semi-transparent blue overlay covers the bottom left portion of the image, containing text.

# Our Communities

We are committed to human rights

We care about the environment

We support the development of our communities

## We are committed to human rights

We respect and support internationally recognized human rights across all our business activities, in accordance with our Policy Statement on Human Rights Strategy.

- We reject all forms of child, compulsory or forced labor.
- We respect labor rights and 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.
- We do not tolerate any form of discrimination or harassment.

We acknowledge the impact of our operations on the environment, which might create adverse impacts on human rights if not addressed correctly.

- [Human Rights Strategy Policy Statement](#)
- [Supplier Code of Conduct](#)
- [BP ESG Management System](#)
- [BD Supplier ESG Due Diligence](#)
- [Bettercoal Initiative](#)

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 and suppliers to do the same and have laid down our core expectations vis-à-vis our suppliers in our Code of Conduct for Suppliers

## What we do

- **Cooperate with international initiatives to promote human rights, labor and ethical business practices**
- **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.**
- **Adhere, where applicable, to our BD Supplier ESG Due Diligence Process, in particular before entering new business relationships.**

## What we don't do

- **Tolerate any form of discrimination or harassment.**
- **Tolerate or support any form of child, compulsory or forced labor in our own business area and supply chain.**
- **Support business activities with third parties that cause or contribute to ongoing, severe human rights impacts.**
- **Provide false information on any ESG monitoring or sampling report.**
- **Accept, ignore or conceal any suspected or known violations of human rights or environmental issues with adverse impacts on human rights.**

**"We are in early negotiations with a potential new business partner operating in high risk areas. How do we know their operations are not contributing to human rights negative impacts?"**

Potential human rights violation in our supply chain could lead to severe reputational and financial damage to the detriment of Uniper (e.g. high administrative fines may be imposed, Uniper may be excluded from the award of public contracts).

For this reason, it is necessary to initiate a due diligence check on human rights in compliance with our BD Supplier ESG Due Diligence Process. Report to Sustainability or Compliance to seek further advice.



## We care about the environment

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.

We use Environmental Management Systems to identify our significant environmental risks and implement control measures to minimize them. We also drive continuous improvement through these management systems.

We obtain all relevant permits and consents from regulatory authorities and comply with all associated requirements.

We develop solutions and technologies to accelerate the transition to a low carbon circular economy.

Everyone can make a contribution to environmental protection through actions such as: reducing waste, recycling and reusing where possible, conserving water and energy and avoiding unnecessary travel.

- [Sustainability Report](#)
- [CO2 Value Report](#)
- [UN Climate Change](#)

## What we do

- **Comply with all applicable legal and other obligations, plus any internal controls designed to minimize the environmental risks of our activities.**
- **Report any spill, release or any other environmental incident or environmental hazard to HSEES (including those where they might create adverse impacts on human rights if not addressed correctly).**
- **Support individual efforts to minimize our daily environmental impacts.**
- **Reduce resource use and waste generation in the workplace.**

## What we don't do

- **Provide false information on any environmental monitoring or sampling report.**
- **Accept, ignore or conceal any suspected or known violations of our environmental compliance obligations.**
- **Waste company and personal resources when sustainable alternatives are available.**

**“Do I need to internally report a release of oils or chemicals even if there was no release into the environment?”**

Yes, you should report all incidents to HSEES, even if they have been contained on site.

If a release has happened, then one of our controls has failed. Reporting helps us understand what went wrong, identify potential hazards and take action before anything more serious happens.



## We support the development of our communities

We want to have a positive impact on our communities; giving back is how we do it. Uniper contributes through:

### Donations & Sponsorship

Uniper has a special responsibility to promote community developments primarily at regional and local levels. This is achieved in many ways, for example by the provision of jobs, as a result of initiatives in social, environmental and cultural spheres, through the commitment of Uniper employees to carrying out voluntary activities or by other appropriate measures. Sponsorship of and initiatives for the development of regions and local communities are key instruments for taking community responsibility. The core of this approach is based on providing practical and financial support for mutual interests which are for the common good and of a public nature.

### Taxes

Taxes play an important role in the development of the countries, cities and municipalities where we operate but they also play an important role in the reputation of Uniper. According to this, our commitment requires compliance with tax laws and regulations of the countries in which we operate, paying respective taxes and always considering the letter and the spirit of the law.

## What we do

- Make sure that all donations are approved in line with the Business Directive Donations & Sponsoring.
- Always fill the checklist Donations or Sponsoring and follow the advice.
- Proactively disclose to Compliance if donations or sponsoring are based on a personal interest or relationship.

## What we don't do

- Offer or grant donations or sponsoring in return for the performance of a service by a public official or for a decision by a company representative.
- Donate to political parties.

**I heard that Uniper is donating some old technical equipment to a non-profit cause. I volunteer for a non-governmental organization (NGO) and am wondering whether my organization can also be considered.**

If your NGO supports a non-profit cause, it can be considered. If you have any responsibility within that NGO, you should disclose it to Compliance to avoid any conflict of interest.

[BD Donations & Sponsoring](#)

