

# Business Continuity, Emergency & Crisis Management Policy

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## The EnBW Board of Management's commitment

EnBW is one of the largest integrated energy companies in Germany and Europe, and supplies electricity, gas, water and heat together with products and services related to energy and infrastructure to its customers. EnBW operates a large number of system-critical facilities and infrastructures in the areas of electricity, gas, heat and water, as well as telecommunications and mobility, the smooth functioning of which is of considerable relevance to our population. Our Business Continuity, Emergency & Crisis Management enables us to make EnBW more resilient while creating added value in terms of the continuity of our business activities and processes.

A handwritten signature in black ink, appearing to read "G. Stamatelopoulos".

Dr. Georg Stamatelopoulos

Chief Executive Officer

A handwritten signature in blue ink, appearing to read "Colette Rückert-Hennen".

Colette Rückert-Hennen

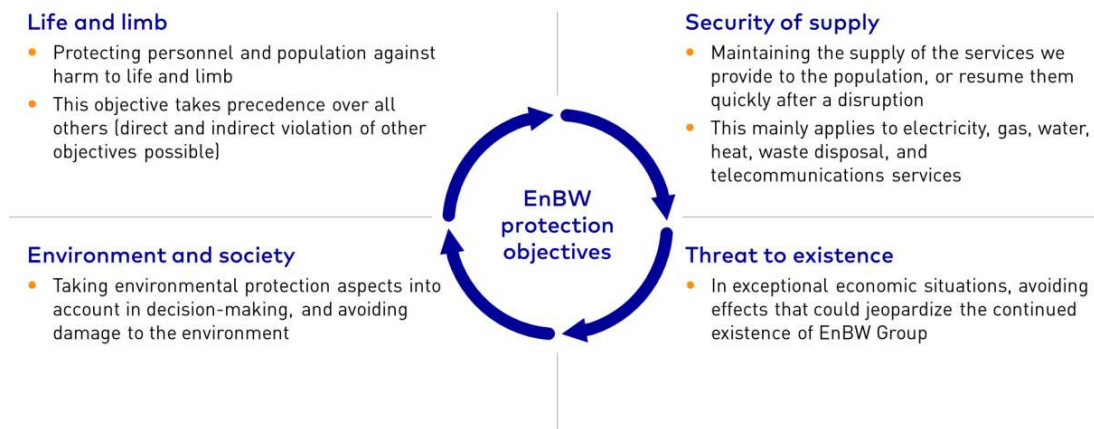
Chief Human Resources Officer,  
Director of Personnel

## 1 Purpose of the policy

This policy sets out the system and structures in place for Business Continuity, Emergency & Crisis Management. It is designed to serve as a frame of reference for the integration of Business Continuity, Emergency & Crisis Management into the EnBW Group's strategy, defining corresponding rules of conduct as well as measures and objectives. Accordingly, this policy contributes to a higher goal, which is to increase resilience. This policy is in line with the Sustainable Development Goals, in particular "SDG 7: Affordable and Clean Energy" and "SDG 9: Industry, Innovation and Infrastructure."


## 2 Obligations and aims

EnBW is an energy supplier and infrastructure company that is positioned across many value creation levels and operates internationally. To protect the company's ability to continue as a going concern and to protect various stakeholders, protection objectives have been formulated that illustrate our self-image and to which we are committed.



Our aim is to avoid potential disruptions, emergencies and crises and, in the event that they do occur, be able to manage them in the best possible manner. In order to meet our protection objectives, further management systems exist on subjects such as occupational safety, information security and risk management, complementing the present protection approach.

At EnBW, business continuity management (BCM) is conceptually based on the international management standard DIN EN ISO 22301. The procedures and methods defined or recommended in this policy and in internal guidelines derived from it for establishing and running an effective BCM generally meet the requirements of the standard. Emergency & Crisis Management should be based on the established BCM where processes and personnel are concerned, making use of the procedures



practiced along the standard. Non-controlled majority shareholdings can alternatively develop and run their BCM in line with BSI Standard 200-4. Its specification as “Standard BCMS” along with a mapping concept linking to the contents of this policy are essential for ensuring equivalence with the ISO specifications on which this policy is based.

The resilience of business operations to disruptive influences and exceptional circumstances is ensured at EnBW with the appropriate level required in each case. The aims are addressed in greater detail in Section 4.

### **3 Scope of application**

This policy is binding for EnBW Energie Baden-Württemberg AG (EnBW AG) as well as for all domestic and foreign majority shareholdings that can be instructed by EnBW AG by means of a domination agreement or in another legal manner. The other majority shareholdings of EnBW AG, which are de facto controlled, have agreed to the direct or analogous application of the policy. The policy does not apply to TransnetBW GmbH, terranets bw GmbH and Ontras Gastransport GmbH. These companies are requested to apply this accordingly.

## **4 Elements of Business Continuity, Emergency & Crisis Management**

Elements of Business Continuity, Emergency & Crisis Management at EnBW are detailed below. We use these to pursue the aim of continuously increasing the resilience of processes and activities.

### **4.1 Conception and organization**

The companies and departments each establish their own conditions for BCM:  
The respective management levels are aware of their responsibility and define minimum strategic requirements for BCM (management commitment). This involves making decisions about the specific type of BCM and its terms of reference, including, for example, the scope (core processes, organizational units, locations), internal and external stakeholders, business continuity objectives and the necessary resources. They take steps to ensure that all measures are appropriately implemented and properly managed and make available the necessary resources (especially in terms of budget and personnel). Management levels can delegate responsibility for the development and on-going operation and support of the BCM – to Business Continuity Officers, for example.

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### **Differentiating between critical and non-critical areas**

From a Business Continuity, Emergency & Crisis Management perspective, EnBW determines the business activities that are to be classified as critical. So-called “critical areas” include companies, departments or individual organizational units. They are fully governed by the requirements for setting up and running a BCM. Events in critical areas can have a significant adverse effect on the provision of services, with negative consequences for the company on the one hand (including jeopardizing the ability of the business to continue as a going concern) and the threat to security of supply on the other. The critical areas should therefore pursue the aim of introducing and running a BCM in accordance with DIN EN ISO 22301 (see also Section 2). This also presents an opportunity for certification.

For the other Group units not listed as critical areas, methodological simplifications are suitable.

## **4.2 Approach**

The basic procedures involved in Business Continuity, Emergency & Crisis Management at EnBW are detailed below.

### **4.2.1 Business impact analyses**

Business impact analyses form an important part of BCM. They provide the necessary transparency in relation to critical processes and resources, whose failure can have an adverse effect on business continuity. A consistent approach is taken to conducting business impact analyses in terms of the methodology and evaluation process.

### **4.2.2 Risk assessment and scenarios**

Risk assessment based on scenarios pursues the aim of enlarging on the results of the business impact analyses in connection with relevant event scenarios. At EnBW, emergency and crisis scenarios are also drawn up, covering more complex and potentially more threatening situations. Furthermore, EnBW has various procedures in place for identifying and analyzing developments and events with crisis potential.

### **4.2.3 Event categories**

EnBW's defense organization body distinguishes between different escalation levels, based on the events that occur. They are essentially divided into BCM, emergency management, crisis management and disaster management.

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### **Normal operations including disruptions**

During normal operations, the BCM in place ensures that any disruptions that affect business continuity are handled in a systematic and appropriate manner. These disruptions are managed by the affected departments, sites or organizational units and dealt with in a systematic manner within the framework of the BCM. The aim is to restore affected processes.

### **Emergency**

If the business continuity activities aimed at managing the event/disruption do not lead to the affected processes reaching a certain level within a specified period of time, and/or if normal operations are unlikely to be restored in the foreseeable future, this is classified as an emergency at EnBW. An emergency can therefore be described as any deviation from normal operations, the extent of which goes beyond a disruption and which can no longer be managed via a systematic approach. Alternatively, events can occur that immediately trigger an emergency. Corresponding criteria are defined individually within the respective companies and departments.

In an emergency declared by the top management level, for example, an Emergency Response Team can continue to manage the event and restore normal operations with enhanced methods and options. Arrangements and procedures for dealing with emergencies should be drawn up independently by the individual companies and departments.

### **Crisis**

At EnBW, a potentially critical situation is defined as an event that is particularly large and/or complex in nature, where there is the threat of a change that requires urgent attention and measures to maintain EnBW's protection objectives, thus requiring special overarching organizational structures and processes to manage the event. Examples of such events include a large-scale blackout, control center shutdowns or IT system failures.

Crises are also declared if – on the basis of an individual assessment of the situation by the EnBW Board of Management – events are considered to be critical and therefore require managing at Group level in the organizational form of a Crisis Response Team.

Due to the independence of the non-controlled majority shareholdings within EnBW, crises can also be independently identified and managed by the Boards of Management of these subgroups.

### **Disaster**

A disaster is an event that endangers the life or health of numerous people, the environment or the vital supply networks of the population to an exceptional extent. Disasters are declared by the disaster management authorities. EnBW is bound by their instructions. To implement and support official measures, EnBW can resort to its own crisis defense and emergency organization operations.

#### **4.2.4 Event management**

Multilevel procedures have been drawn up that companies and departments can use to manage the events categorized above.

##### **Event management within the framework of BCM during disruptions**

Based on the results of the business impact analyses and risk assessments, backup strategies are defined for maintaining and restoring critical processes and keeping them operating in an emergency situation. They should be based on formulated emergency operating levels and include business continuity plans (alternatively instructions and checklists).

##### **Event management in an emergency**

"Critical areas" of EnBW have also established appropriate emergency organization teams (such as an Emergency Response Team) in the overall context of BCM, giving them the capacity to take effective action in an emergency.

The remaining areas should examine the extent to which they need to set up or maintain their own emergency organization operation, beyond their business continuity organization.

##### **Event management in a crisis**

Once a crisis has been declared, necessary measures are managed by a Crisis Response Team with wide-ranging powers to issue instructions. In the course of crisis management, the current threat situation is continuously assessed and suitable measures are devised and taken.

#### **4.2.5 Involvement of external and internal stakeholders**

When disruptions, emergencies or crises occur at EnBW, the underlying event can have significant external effects. In keeping with its self-image, EnBW sees it as its duty to inform all stakeholders affected by an event in line with existing plans and, if necessary, involve them in the management of the event (examples include establishing telephone contact with politicians at state and local level, and warning affected infrastructure users and supporting them).

#### **4.2.6 Tests and exercises**

Regular scheduled tests and exercises help to identify areas in need of improvement in Business Continuity, Emergency & Crisis Management. They also help to boost the organization's responsiveness and review the effectiveness of reporting chains and management measures.



#### **4.3 Controls, reporting and continuous improvement**

EnBW regularly evaluates and reviews the performance and effectiveness of its Business Continuity, Emergency & Crisis Management (monitoring). For the purposes of driving continuous improvement, especially where BCM is concerned, aspects taken into consideration at EnBW include:

- Involving relevant management levels in the BCM activities of their respective areas – in the form of an annual management review or regular resilience reporting, for example.
- Safeguarding critical business processes by drawing up management measures (especially business continuity plans), with tests and exercises carried out at regular intervals.
- Putting plans in place and ensuring that personnel with specific roles are suitably qualified (by equipping them with the necessary skills through education and training).
- Getting companies and departments to regularly review their BCM with regard to requirements stemming from internal regulations (such as Group guidelines) and external policies.

Key performance indicators can be used to measure the achievement of BCM objectives. Examples include the number of critical business processes or tests and exercises carried out.

#### **4.4 Reporting channels and cooperation obligations**

EnBW has a number of reporting channels for reporting anomalies, disruptions or events with emergency and crisis potential. These are supplemented by (automated) early warning systems. There are also various communication channels for external stakeholders to report anomalies and suspected incidents – when supplies have been interrupted, for example – online and by phone.


## **5 Responsibility**

### **5.1 Responsibility at board and individual company level**

The defense organization established on behalf of the EnBW Board of Management helps the latter to mitigate the impact of serious or extraordinary events. It takes some of the pressure off the Board of Management and other management bodies in particular with regard to early detection, risk assessment and operational event management, while forming the basis for companies' and various departments' own incident-management structures. The EnBW Board of Management emphasizes the relevance of the subject by establishing an appropriate "tone at the top."

The EnBW Board of Management has transferred the governance of this defense organization to the "Business Continuity & Crisis Management" central department, which is part of EnBW's "Business Resilience" functional unit.

The boards of management and management teams across the various companies are aware of their responsibility, defining minimum strategic requirements in the context of this policy and implementing the requirements of this policy in a manner that is tailored to their entities' business

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activities. They make every effort to identify critical processes, define strategies for safeguarding them and emphasize the relevance of the subject by regularly establishing a “tone at the top.”

## **5.2 Responsibility in the various specialist departments**

The departments, including specialist departments, have the necessary knowledge to assess the impact of disruptions on critical business processes, determine the risks of failure and their impact, and devise measures for safeguarding and restoring processes. This knowledge is acquired through training, for example. Business process owners are appointed for critical processes.

## **6 Non-compliance**

The reporting channels set up as part of EnBW AG’s whistleblower system are available to (anonymously) report violations of the provisions contained in this policy as well as any other (potential) compliance violations that arise in connection with EnBW’s business activities. The measures put in place by EnBW AG define clear responsibilities and processes for dealing with compliance violations, guarantee confidentiality and offer the greatest possible protection for all parties involved. The rules of procedure for the whistleblower system set out the responsibilities, the process and the underlying principles.

## **7 About this policy**

This policy version is the one that is currently valid. It is regularly reviewed to ascertain whether any changes need to be made and updated as necessary. Depending on the change made, approval will be given by the Board of Management or a body authorized by it.

No claims or other third-party rights may be asserted on the basis of this policy.