

Pollutants Management Policy



EnBW Energie Baden-Württemberg AG
Durlacher Allee 93
76131 Karlsruhe

Contents

The EnBW Board of Management's commitment	3
1 Purpose of the policy.....	5
2 Obligations and aims.....	6
3 Scope of application	7
4 Responsibility.....	7
4.1 Responsibility at board and individual company level	7
4.2 Responsibility in the various specialist departments	8
5 Non-compliance	8
6 About this policy	8
7 Definitions	8

An orange horizontal bar with rounded ends, located above the section header.

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. Environmental protection and climate action are integral parts of the Group strategy and the EnBW Board of Management resolutely defines targets and implements measures to pursue these objectives. For us, comprehensive environmental protection and climate action include a commitment to decarbonization, consistent application of our environmental management plan, a forward-looking approach to managing climate risks, a focus on reducing pollutants, a resource-saving waste and water management strategy and protection of biodiversity.

Our environmental principles described below define our strategic approach in these areas.

EnBW is committed to delivering a secure and sustainable energy supply

- We consider sustainable business practices to involve simultaneously taking economic, environmental and social responsibility.
- As a company, we share responsibility for protecting our environment and maintaining biodiversity. We not only consider the potential negative impacts of our activities on the climate and environment but also focus on the future-oriented and sustainable use of all natural resources.
- Our energy mix aims to guarantee security of supply, combined with careful environmental management and appropriate economic efficiency.
- We take precautionary measures to ensure the safe operation of our plants and protection of the environment by managing our impacts, risks and opportunities.


EnBW promotes communication of environmental matters and helps to raise awareness of them

- We engage in open dialogue with politicians, authorities, the world of science, the general public and social groups on environmental matters and develop and maintain partnerships.
- The environmentally responsible conduct of our suppliers and contractors is important to us.
- Our employees act with the environment in mind and are continuously updating their qualifications.

EnBW is committed to environmentally compatible activities across all its business areas

- Within our value creation processes, we are committed to complying with the legal requirements. In addition, we voluntarily comply with other, more far-reaching standards for sustainable corporate management.

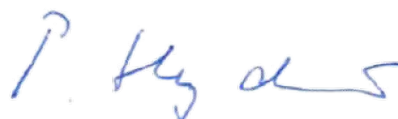
Pollutants Management Policy

- 
- A solid orange horizontal bar with rounded ends.
- We provide our customers with innovative products and services for the efficient use of energy and are continuously improving them.
 - We are resolutely committed and dedicated to the continuous improvement of our environmental performance, provided this is economically viable. To this end, we define ambitious environmental targets and publish our environmental data.

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 "P. Heydecker".

Peter Heydecker

Chief Operating Officer, Sustainable Generation Infrastructure

1 Purpose of the policy

This policy is designed to serve as a frame of reference for the integration of management measures aimed at reducing and minimizing pollutants into the EnBW Group's strategy. It defines corresponding rules of conduct as well as measures and targets. This policy has been produced in line with recognized frameworks such as the Sustainable Development Goals (SDG 11 "Sustainable cities and communities") and the ten principles of the UN Global Compact.

This policy lays down principles for reducing harmful emissions – and air pollutants in particular. EnBW is committed to complying with these principles. Harmful emissions released into water or soil play a subordinate role in the business activities of the EnBW Group compared to air pollution because they are neither generated continuously nor to a significant extent in the Group. Details can be found in the EnBW Water Management Policy.

The following air pollutants are mainly considered here:

- › Nitrogen oxides (NO_x)
- › Sulfur dioxide (SO₂)
- › Carbon monoxide (CO)
- › Dust (containing particulate matter PM10)*
- › Mercury (Hg)
- › Other heavy metals (HM)

* Particulate matter PM10 will not be reported separately as there is no expectation that the PRTR threshold will be exceeded.

This policy does not deal with greenhouse gas emissions, such as carbon dioxide (CO₂), methane / natural gas (CH₄), nitrous oxide (N₂O) and sulfur hexafluoride (SF₆). Details on greenhouse gas emissions can be found in EnBW's Environmental & Climate Action Policy.

In the course of the EnBW Group's business activities, any significant impact related to air pollution is mainly caused by the operation of stationary conventional energy generation plants that use fossil or renewable fuel.

The following obligations and aims apply across all companies of the EnBW Group for those plants that achieve at least 50 MW of rated thermal input individually or as a joint plant. They do not apply to small combustion plants and emergency power generators.

2 Obligations and aims

EnBW has set itself the target of continuously reducing its harmful emissions. The aim is to act responsibly within its business processes and make a significant contribution to controlling air pollution by taking a sustainable approach to dealing with pollutants.

Specific targets and results are summarized and published on our website and in the EnBW Group's Annual Report.

EnBW endeavors to take various aspects into account, including:

Coal phaseout and fuel switch: EnBW is making the fuel switch from coal to natural gas as a bridging technology at suitable conventional power plant sites. The ultimate aim is to convert these plants to run on hydrogen as soon as it is available in sufficient quantities and insofar as it is economically viable. EnBW is also aiming to decommission coal power plants that cannot be converted to run on natural gas, provided that the appropriate framework conditions are met.

Environmental impact assessments: When new conventional energy generation plants are built, the best available techniques (BAT) that are currently recognized throughout Europe are used for cleaning the air and wastewater. An environmental impact assessment is generally carried out for new energy generation plants before they are built.

Needs-based retrofits: When operating existing generation plants, retrofits may be needed to ensure that no more air or wastewater pollutants are emitted than allowed by the best available techniques (BAT) recognized throughout Europe.

Emissions monitoring: The requirements relating to the best available techniques (BAT) currently recognized throughout Europe are also met in the course of emissions monitoring and measurement.

Conducting audits: External or regular internal inspections of harmful emissions are carried out at least once a year at all relevant conventional energy generation plants. Regular inspections and functional tests are carried out at all relevant plants by approved measuring bodies or certified experts in air pollution control and water pollution control. The authorities also carry out monitoring activities and help to identify and mitigate risks. Inspections by company officers and audits based on the environmental management standard ISO 14001 serve to continuously monitor legal compliance and identify potential for improvement. This enables us to systematically assess risks and take appropriate action to reduce environmental impacts.

Behavior in emergency situations: We have organizational and procedural measures in place to counter environmental incidents that could lead to pollutants being released into the air, water or soil. These also cover our emergency response and hazard prevention plans, with provisions in place to regularly practice how to behave in emergency situations, also involving external emergency services. Every power plant site has plans covering immediate measures and hazard prevention. These describe how to behave correctly in emergency situations.

Risk management: EnBW's integrated risk and opportunity management system (iRM) identifies, records, evaluates and manages environmental risks and opportunities using a standardized risk map. Environmental aspects such as harmful emissions are thus regularly updated – and at least once a year as part of the annual risk inventory. The process is overseen by the risk management department and supplemented by ongoing dialogue with the environmental protection department, ensuring that risks and opportunities are integrated into the corporate strategy in a sustainable manner.

Employee training: In order to achieve the objective of reducing pollutants, relevant employees regularly receive internal and external training on matters covering environmental regulations and best practice.

Pollutants management in the supply chain: EnBW's Supplier Code of Conduct requires our suppliers and business partners to take suitable action to minimize environmental damage resulting from their business activities and business relationships. In particular, we expect them to continually monitor compliance with relevant environmental, health and safety regulations in their operations and work toward achieving compliance in their supply chain. Our suppliers are also required to use resources carefully, minimize emissions, pollutants and polluting wastewater, and safeguard water quality and soil fertility.

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 Responsibility

4.1 Responsibility at board and individual company level

In its Business Allocation Plan, the Board of Management of EnBW AG has delegated responsibility for the universal task of "environmental protection" to the Chairman of the Board of Management. The Chairman of the Board of Management represents EnBW's interests concerning overarching environmental issues within the Group, creating the conditions for the introduction and maintenance of environmental management systems at Group level and appointing a management officer to deal with environmental protection matters within the Group.

It is the responsibility of the individual Group companies to organize suitable measures for identifying and reporting harmful emissions and carrying out risk assessments in this regard, based on

their business activities and the laws and requirements that apply to them. Where relevant, designated emission control officers are appointed, among other measures.

4.2 Responsibility in the various specialist departments

The management officer for environmental protection matters within the Group reports directly to the member of the Board of Management with responsibility for the environment. In terms of matters concerning harmful emissions, the environmental protection officer is particularly tasked with ensuring Group-wide reporting of key performance indicators relating to harmful emissions, among other things, and reporting on the achievement of the targets.

5 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.

6 About this policy

This policy is the currently valid version. 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.

7 Definitions


BAT/IED

Best available techniques according to the latest version of the EU Industrial Emissions Directive (IED) as implemented nationally.

Fuel switch

In relation to generation in thermal power plants: Switching from coal as a fuel to more climate-friendly options such as natural gas and hydrogen.

Pollutants Management Policy

A solid orange horizontal bar with rounded right-hand corners.

Thermal output	The thermal output installed at a power plant site.
Conventional energy generation plants	Plants that generate energy (electricity, heat, kinetic energy) using fossil or renewable fuel.
Power plant site	A site where one or more conventional energy generation plant(s) are combined as a joint plant under licensing law.
PRTR	The Pollutant Release and Transfer Register drawn up in accordance with the latest version of the EU Directive as implemented nationally.