

Stakeholder Engagement 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 to its customers, together with energy and infrastructure products and services. Taking into account legitimate stakeholder demands and interests is one of EnBW's core values and is firmly enshrined in our corporate strategy. Our stakeholders¹ – industry (partners), the financial market, civil society, customers, employees, local communities, politics and the public/media – are of critical importance to our business of supplying electricity, gas, water and heat as well as energy and infrastructure services and products. Only by working constructively with all our stakeholders can we build the necessary trust needed to achieve our long-term energy transition goal, which requires acceptance at local level.



Dr. Georg Stamatelopoulos

Chief Executive Officer



Colette Rückert-Hennen

Chief Human Resources Officer, Director of Personnel

¹ The terms stakeholder, stakeholder group and interest group are used interchangeably in this policy.

1 Purpose of the policy

The policy links stakeholder engagement with EnBW's strategy. To this end, it sets out binding, standardized rules of conduct as well as obligations and targets. Accordingly, this policy contributes to a higher goal, supporting developments and activities in our Sustainable Generation Infrastructure and System Critical Infrastructure business areas in particular.

Only by making sustainable decisions that take into account economic interests as well as our stakeholders' other legitimate needs and expectations can we fulfill our mission to society: to successfully transition to low-carbon energy while guaranteeing a secure and affordable energy supply. The aim of the Stakeholder Engagement Policy is therefore to disclose and explain our processes and structures when working with our stakeholder groups. This approach will enable us to manage the complexities of sustainable transformation together and secure EnBW's long-term success.


The policy creates a basis for reconciling the interests of stakeholders with EnBW's overall strategy. One particular focus area addresses the concerns, needs and rights of local communities. In this context, the document sets out key guiding principles, obligations and aims.

2 Obligations and aims

The aim of our commitment is to strengthen the cooperation with our stakeholders and to promote a constructive dialogue. This is how we aim to identify potential challenges at an early stage and tackle them together. In order to adequately achieve our aim, we have defined principles that must underpin every stakeholder engagement process: Honesty, accuracy, transparency and mutual respect ensure that we can involve our stakeholders in a constructive and meaningful manner and drive our projects (see Section 8 for definition) effectively and efficiently. These are voluntary commitments without any legally binding provisions that could lead to the assertion of third-party claims.

The overarching objective can be summarized as follows:

- In the course of its business activities, EnBW systematically takes into account stakeholders' legitimate needs and concerns, which are continually recorded (e.g., in the form of stakeholder mapping).
- EnBW raises awareness among its employees (e.g., using internal training sessions) of the importance of stakeholders and stakeholder engagement to the successful implementation of its projects.
- The dialogue with the various stakeholders in the context of the projects is held in a systematic, understandable, transparent and timely manner by making information relating to the project publicly available, for example, and using feedback mechanisms to ensure that the concerns and



opinions of the stakeholders can be heard in good time and incorporated into the decision-making processes.

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.

Since the cooperation with stakeholders affects various areas of EnBW, the obligations should especially be seen as a supplement to existing EnBW guidelines, such as the EnBW Code of Conduct, the EnBW Policy Statement and the EnBW Declaration of Human Rights.

The scope of this Stakeholder Engagement Policy focuses on EnBW's activities. Aspects of stakeholder engagement in the supply chain – concerning the procurement of raw materials, for example – are regulated by the Supplier Code of Conduct, the EnBW Declaration of Human Rights, the Principles of Conduct for the Responsible Procurement of Coal and Other Raw Materials and the EnBW Policy Statement. Business partners in the sense of this Supplier Code of Conduct are all companies outside of the EnBW Group that supply goods and services to EnBW. The Supplier Code of Conduct forms the basis for our business relationships and is thus an obligatory part of contracts with our business partners. We not only expect our business partners to comply with the current Supplier Code of Conduct themselves but also to communicate it to their own suppliers and business partners and to take reasonable measures to ensure that it is complied with by their own suppliers and subcontractors.

4 Stakeholder engagement

4.1 Stakeholder groups and engagement formats

In line with the aims of the Stakeholder Engagement Policy, EnBW strengthens cooperation with its stakeholders by informing, listening, involving and observing. Our business activities as an energy supplier and infrastructure company involve working with a wide range of stakeholder groups. The most relevant groups for EnBW AG – this does not necessarily apply to all affiliated entities – are defined below. Communication with these stakeholders takes various forms, ranging from, for example, the Energy Sector Dialogue and investor road shows to information events for citizens and participation in trade fairs and congresses. Regional council meetings are also held, plus there is active communication via conventional and social media.

Stakeholder Engagement Policy

Stakeholder	Definition
Industry (partners)	Companies and organizations (e.g., partners, suppliers, competitors) that work with EnBW on projects, innovations and market development and play an important role in driving technological progress and sharing examples of best practice.
Employees	The workforce comprises all employees across various horizontal and vertical levels of the Group.
Financial market	Investors, banks and others involved in the financial market play a key role for EnBW in terms of financing its operating activities and its growth strategy, guaranteeing financial flexibility and helping to manage risks.
Customers	Private individuals, companies and public entities that purchase and use EnBW's energy products and services and whose satisfaction and trust are critical to growth and success in a highly competitive market.
Local communities	Populations, residents and groups living in or near the areas where EnBW operates, especially those affected by the energy infrastructure projects.
Politics	Government agencies, authorities and political representatives at local, national and international level that shape energy policy, issue regulations and create the legal framework within which EnBW operates.
Civil society	Non-governmental organizations (NGOs) and social organizations that represent various interests – especially those concerning environmental protection, human rights, and social justice – and influence public opinion and regulatory policy.
Public/media	The general public, journalists and media organizations that influence public perception and discourse on energy (sector matters), sustainability and corporate responsibility through news articles, reports and public discussions.

4.2 Relations with local communities

Local communities are important stakeholders in EnBW's value chain. They play a key role in the success of infrastructure projects and are directly exposed to the potential impact of EnBW's activities. Particularly in view of the growing demand for renewable energies and the need for grid expansion, cooperation with local communities and residents is increasingly important and therefore essential for a successful energy transition.

Local communities are defined as interest groups that live in areas directly affected by EnBW's business activities and infrastructure projects. This is particularly the case in the Sustainable Generation Infrastructure and System Critical Infrastructure business segments. When it comes to the environmental, social and economic impact of the company's activities, these communities have a

legitimate interest in being taken into consideration. This may relate to local environmental protection, economic opportunities (such as jobs and investments) and potential disruptions during construction work or operations. To ensure our projects are successful and accepted by society, it is essential to analyze the rights, expectations and feedback of the stakeholder groups and take everything into account early on in any project planning and decision-making processes.

In addition to the overarching measures aimed at involving stakeholders, EnBW takes individual measures that are specifically tailored to the needs of local communities and residents. The focus here is on community consultation and development as well as increasing acceptance. The formats used may include visits to power plants, public information events, corporate volunteering projects, citizen participation at local level, financial participation in regional renewable energy projects or instruments aimed at minimizing risk and protecting communities.

5 Responsibility

5.1 Responsibility at board and individual company level

EnBW is wholeheartedly committed to engaging with its stakeholders. To meet this obligation, the Chairman of the Board of Management's remit is to take a leading role in the development, management and advancement of our stakeholder engagement initiatives and make sure that they are fully integrated into our overall strategy. When planning and implementing the projects, the individual members of the Board of Management are responsible for ensuring that the obligations and aims linked to stakeholder engagement as defined and set out in Sections 2 and 4 are implemented in conjunction with their respective management teams.

The boards of management and managing directors of the Group companies implement the governance structure in a manner commensurate with the structures and responsibilities defined herein or put in place appropriate structures for the respective affiliated entity in line with their activities and the impact on external stakeholders, taking into account available resources and existing structures. The effectiveness of the policy should be monitored in the affiliated entities by a committee or a (staff) unit similar to EnBW AG's CSRD stakeholder committee.

The effectiveness of the policy is monitored at AG level by the CSRD stakeholder committee. The role of the CSRD stakeholder committee is to incorporate the interests and views of stakeholders into the materiality analysis. It is made up of heads and managers across EnBW's different business areas – such as sustainability, communication, purchasing, sales and investor relations – and meets twice a year. It is used in the context of stakeholder engagement to monitor the effectiveness of the policy, take appropriate control measures and ensure continuous improvement of the process based on stakeholder feedback.

5.2 Responsibility within the specialist departments

Responsibility for the operational implementation of stakeholder engagement and the obligations, aims and principles defined in this policy lies with the specialist departments involved in the implementation of projects. The managers listed below are responsible for operational implementation at EnBW AG (see 5.1 for affiliated entities). This is EnBW's way of striving to ensure that interactions with the relevant interest groups are aligned as closely as possible with our obligations and aims.

- › Industry (partners):
Heads of Purchasing (F-E), Sustainability (C-N), Trading (T-T) and Contracting (T-BC)
- › Financial market:
Head of Investor Relations (F-FI)
- › Civil society:
Heads of Policy and Government Affairs (C-P), Communications and Brand (C-K) and Sustainability (C-N), as well as project-related heads of Sustainable Generation Infrastructure (T) and Grids (S-EN), among others
- › Customers:
Head of Sales, Marketing and Digital (S-V)
- › Employees:
Heads of HR, Legal and Corp. Real Estate Management (H)
- › Local communities:
Project-related heads of Sustainable Generation Infrastructure (T) and Grids (S-EN), among others, and the Head of Communications and Brand (CSR) (C-K)
- › Politics:
Head of Policy and Government Affairs (C-P)
- › Public/media:
Head of Communications and Brand (C-K)

In addition, the project managers in the respective areas of generation, grids, location and power plants are responsible for implementing the stakeholder engagement requirements set out here.

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.

8 Definitions

Project

A project is “[a]ny plan that is essentially characterized by the unique nature of the conditions as a whole, such as the objectives and time frame, as well as any financial, personnel-related and other limitations, differentiation from other projects, and project-specific organization” (GPM German Association for Project Management). The following criteria are added to the above definition for the purposes of this policy:

- High objective relevance for stakeholders: A project has a significant and objectively demonstrable economic, environmental or social impact on stakeholders such as local communities or civil society.
- Complexity and long-term impact: A project needs comprehensive planning, significant investment and close cooperation with stakeholders such as politics/authorities or industry (partners).
- Location and topology of the projects: A project as per this definition is carried out in (public) (outdoor) spaces. Smaller projects in or at existing locations (e.g., office building renovations or power plant repairs) are thus excluded unless they have a bearing on the legitimate interests of stakeholders (e.g., converter construction work on former power plant sites).

Taking stakeholder concerns into account/consideration

For the purposes of this policy, “taking into account/consideration” stakeholder concerns should be understood as EnBW acknowledging the legitimate concerns, interests and expectations of stakeholders to a reasonable extent, as well as examining them and integrating them into the decision-making processes. In doing so, EnBW undertakes to be responsive to the concerns of the stakeholders, actively look into them, take legitimate claims seriously and ensure transparency throughout the entire process of dealing with any concerns. This does not necessarily imply that all concerns will be fully resolved, but is merely intended to ensure that reasonable steps are taken to reflect upon them and integrate them into decision-making processes.