

Waste Management Policy

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Contents

The EnBW Board of Management's commitment	3
1 Purpose of the policy.....	5
2 Obligations and aims.....	5
3 Scope of application	6
4 Management of hazardous and radioactive waste	7
4.1 Hazardous waste.....	7
4.2 Radioactive waste	7
5 Responsibility.....	8
5.1 Responsibility at board and individual company level	8
5.2 Responsibility in the various specialist departments	8
6 Non-compliance	8
7 About this policy	9
8 Definitions	9



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.

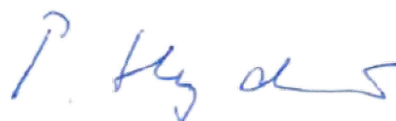
Waste Management Policy

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- 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 blue 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 waste management into the EnBW Group's strategy, defining corresponding rules of conduct as well as measures and targets. Accordingly, this policy contributes to the higher goal of minimizing environmental pollution caused by waste. This policy has been produced in line with recognized frameworks such as the Sustainable Development Goals (SDG 9: "Industry, innovation and infrastructure," SDG 11: "Sustainable cities and communities" and SDG 12: "Responsible consumption and production") and the ten principles of the UN Global Compact.

The principles and obligations for dealing with wastewater are published in EnBW's Water Management Policy.

2 Obligations and aims

EnBW has set itself the target of reducing its waste and making a significant contribution to various aspects of waste management through its policy commitment to manage waste responsibly and sustainably. It also encourages the protection and sustainable use of resources within its business processes. Specific targets and results are summarized and published on our website and in the EnBW Group's Annual Report.


EnBW has produced this policy to reaffirm its commitment to assessing the waste generated in the course of its business activities, promoting initiatives aimed at improving the circular economy and reducing waste across its sites.

EnBW endeavors to take various aspects into account, including:

Waste management and legal requirements: EnBW operates its waste management system, including waste preparation and transport, in line with the national legal requirements and the European Union's circular economy action plan. This includes consistent application of the waste hierarchy, where waste is preferably avoided. If this is not possible, it should be prepared for reuse or recycled before disposal is even considered as a last resort.

Waste reduction and minimization: EnBW makes every effort to reduce the amount of waste generated by the Group, especially within its own energy generation activities. This should be achieved by adopting efficient production processes, phasing out coal, switching from coal to natural gas in fuel switch plants and expanding renewable generation plants. The measures taken include preventing the generation of waste by adhering to quality assurance processes that lead to the manufacture of marketable by-products.

Recycling and sorting waste: EnBW actively encourages the recycling and sorting of waste in all business areas. The provision of suitable collection containers ensures that recyclable materials are sorted and fed into the recycling process.

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Circular economy: EnBW endeavors to embrace the concept of the circular economy, which focuses on using resources efficiently and minimizing waste. This includes reusing materials, encouraging recycling and making substitutions with products and processes that ensure a longer service life and make materials easier to reuse or recycle.

Monitoring and conducting audits: EnBW records the volume of waste generated in an internal Group-wide environmental database in order to regularly review waste management processes. Strict compliance with relevant legislation forms the basis for our work. In line with legal requirements, waste officers are appointed to regularly monitor the waste management processes. Inspections by company officers and audits of companies with environmentally relevant activities 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.

Industry bodies and partnerships: EnBW is involved in industry associations. Membership includes active participation and involvement in professional committees and technical groups of relevant industry associations that deal with matters concerning waste and recycling management, among other things.

Employee training: EnBW upskills its employees in the relevant departments by providing regular internal training and organizing external training courses on the subject of waste management. This includes, among other things, raising awareness of the careful use of resources and teaching them how to correctly handle waste.

Waste management in the supply chain: Our Supplier Code of Conduct requires our suppliers and business partners to take suitable action to minimize environmental damage – and waste – resulting from their business activities and business relationships. For example, only qualified and legitimate companies (generally waste management companies) should be chosen and commissioned to dispose of waste.

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 Management of hazardous and radioactive waste

As one of the largest integrated energy companies in Germany, EnBW operates in business areas that generate both hazardous and radioactive waste. This waste presents a particular challenge due to its potential environmental and health risks. EnBW therefore takes extra care to ensure the safe handling and disposal of this waste in order to guarantee the safety of employees, the public and the environment. Strict regulatory requirements as well as national and international standards must be met in order to minimize long-term risks and promote sustainable development.

4.1 Hazardous waste

EnBW is committed to handling hazardous waste safely and responsibly within its own business activities and keeping it at a low level. EnBW complies with legal requirements in this regard, identifying and classifying waste in accordance with the European list of waste under Commission Decision 2000/532/EC and Annex III of the Waste Framework Directive 2008/98/EC, which has been transposed into national law in Germany, for example, by the Waste Classification Ordinance (*Abfallverzeichnis-Verordnung AVV*). This ensures that hazardous waste is identified and handled on the basis of its hazard potential. The waste is stored in specially designated waste disposal zones that are designed to prevent leakages. Hazardous waste is transported in line with strict safety measures and in accordance with the regulations. EnBW generally works with certified waste management companies that possess the necessary expertise and infrastructure to transport, handle and dispose of hazardous waste safely. Employees who handle hazardous waste receive regular training on the safe handling of hazardous waste.

EnBW continuously monitors the quantity and different types of hazardous waste generated and documents the disposal processes for the responsible authorities. This ensures transparency and compliance with all legal requirements. By taking these measures, EnBW ensures that hazardous waste is handled safely and responsibly to protect people's health and safeguard the environment.

4.2 Radioactive waste

EnBW phased out nuclear energy after decommissioning the last of its nuclear power plants in 2023. We are also committed to reducing radioactive waste and handling it responsibly during subsequent dismantling.

Residual material treatment facilities have been established to remove adherent radioactivity from the material dismantled at EnBW's nuclear power plants, increase the proportion of recyclable materials and minimize the volume of radioactive waste. As a result, only about one percent of the material mass removed during the dismantling of nuclear power plants is ultimately classed as radioactive waste. Continuous monitoring and measurement of radioactive waste is essential to guarantee safe handling and compliance with regulatory requirements. This takes the form of regular internal and external controls as part of the conditioning and storage of radioactive waste.

Measures are taken to ensure the proper disposal of radioactive waste by complying with relevant laws, directives and standards such as the final disposal conditions for Konrad. An incident

investigation and corrective action plan established across the sites along with training and awareness-raising measures for employees help to ensure safety and protection of the environment. All employees involved in the conditioning and storage processes are given radiation protection training at least once a year. Depending on the area of specialization, appropriate professional training measures are also mandatory.

When investigating incidents and taking remedial measures, EnBW conducts internal analyses and liaises with other operators to evaluate events and take appropriate action with the aim of minimizing future risks and maximizing safety.

5 Responsibility

5.1 Responsibility at board and individual company level

In its Business Allocation Plan, the Board of Management of EnBW AG has delegated responsibility for the cross-functional 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 put in place suitable measures for identifying waste and producing reports 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 waste officers are appointed, among other measures.

5.2 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 waste, the environmental protection officer is particularly tasked with ensuring Group-wide reporting of key performance indicators and reporting on the achievement of the targets.

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 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.

8 Definitions

Final disposal conditions for Konrad	Requirements specified by the Federal Company for Radioactive Waste Disposal (BGE) that radioactive waste must meet before it can be safely stored in the Konrad repository. These requirements concern the radiological and material properties of the waste as well as its packaging and documentation.
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.
Conditioning	The treatment and packaging of radioactive waste for interim and final storage.
Circular economy	A system that aims to minimize the use of resources, avoid waste and reuse or recycle materials.
By-products	By-products are materials that are produced during a manufacturing process in addition to the main product. One example of this is conventional energy generation, especially in thermal power plants, where by-products such as fly ash, gypsum and slag are produced, which can be reused in the construction industry.
Recycling	The processing of raw materials for reuse.