

**RWE**

**Growing Green  
with integrity.**

**Compliance Report 2024**

**A warm welcome**  
**Glad you are here**

## Foreword by the Chief Compliance Officer

*In line with its “Growing Green” mission, RWE is focusing on sustainable energy solutions to drive the transition to a greener future. This transition requires the company to continuously adapt and evolve. We want to achieve growth in line with the law and our own values and principles, whereby a strong commitment to compliance is essential. As the trust of our employees, business partners, stakeholders and society in RWE is very important to us, we are committed to high compliance standards in order to maintain this trust and ensure the long-term success of our company.*

*It is my pleasure to now present to you our Compliance Report for the year 2024, which provides you with an overview of our compliance activities and the essential elements of the Compliance Management System.*



**Ilka Röhrhoff**

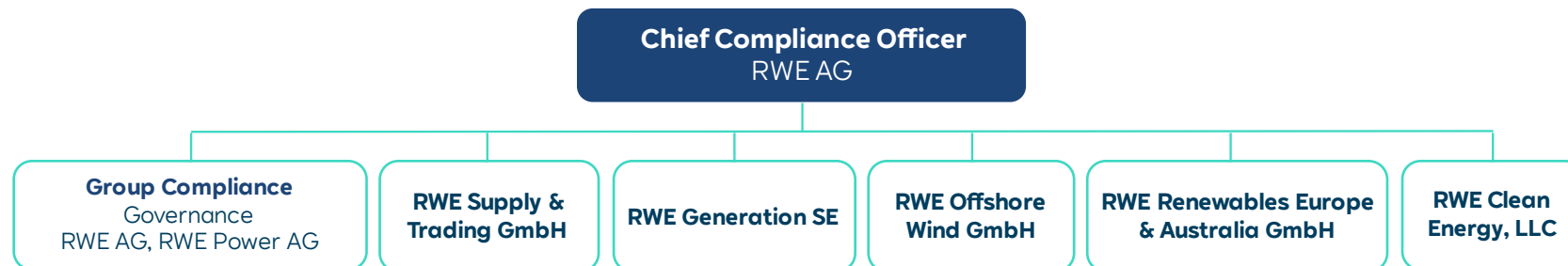
## Compliance at RWE We provide orientation

**The Chief Compliance Officer (CCO) of RWE AG is responsible for the overall management of the Compliance Management System (CMS).** At RWE, this responsibility covers the areas of anti-corruption, prevention of money laundering and terrorist financing as well as sanctions and export control compliance.

**In 2024, the structure and responsibilities of the compliance function of RWE were further developed.** Group Compliance is responsible for Group-wide governance topics, guidelines and processes and defines the minimum standards in all CMS elements. Group Compliance also advises RWE AG and RWE Power AG on compliance topics. The other operating Group companies have established their own compliance departments.

**The global Compliance Officers are responsible for implementing the requirements by Group Compliance in their respective operating Group company.** In doing so, they also take local laws and regulations into account. Furthermore, the necessary measures and processes are implemented in accordance with the business model of the respective Group company.

The Compliance Officers report directly to their respective management boards and functionally to the CCO. The CCO in turn informs the Executive Board and the Audit Committee of the Supervisory Board of RWE AG about compliance-relevant topics, such as legal developments, the further development of the CMS or indications of potential compliance violations.



## Compliance Management System

### Our approach

**Corruption and any kind of compliance violations are not tolerated.** We base all business activities and decisions on defined compliance guidelines. To prevent compliance violations, we have established a Compliance Management System that is aligned with the Group's risk situation and is regularly audited in accordance with IDW assurance standard 980.

The aim of the CMS is to ensure compliance with laws and internal company requirements throughout the Group. Our CMS serves to identify corruption and other compliance risks as well as to prevent violations of applicable laws and internal guidelines. The CMS describes a large number of processes and measures that are implemented in the Group.

**The compliance risk analysis is a central part of the CMS.** Starting with the identification and assessment of the main compliance risk areas through to the derivation of any necessary measures that may be required, we involve the specialist departments and the operational units in the risk analysis. Risk analyses were also carried out in 2024.

**Geographical (country) risk is a decisive factor in the management of compliance risks.** Risk-based decision-making and approval processes have been established on the basis of a qualitative risk analysis that takes various indicators into account. These processes must be adhered to throughout the Group and apply to the initiation of business activities as well as the acquisition of (financial) participations in or in relation to risk countries.

**The internal control system is the basis for preventing process errors and misconduct.** This includes organisational requirements such as the dual control principle, separation of functions, authorisation concepts and approval procedures. There are also other processes and controls that we consider necessary. For example, a Compliance IT-Tool is used in the Group to make compliance-sensitive processes transparent. Donations, sponsorships and memberships as well as compliance-relevant consultancy and agency contracts are documented here. Furthermore, gratuities to public and elected officials that are considered relevant according to our Group Directive are recorded.



## Code of Conduct

### The basis for our actions

**Entrepreneurial behaviour in accordance with laws and values is our highest principle.** That is why our Code of Conduct contains rules that apply to all employees of the Group without exception. The Code of Conduct is preceded by ten principles of conduct that contain the most important statements on topics such as human rights, labour standards, anti-corruption and avoiding conflicts of interest, anti-money laundering and foreign trade law.

We joined the United Nations Global Compact initiative as early as 2004 and signed up to its ten principles. In doing so, we explicitly committed to consistently respecting human rights and labour standards, strengthening environmental protection in our business activities, and actively preventing corruption.

**We expect our business partners to have a compliance standard comparable to ours.** In principle, our business partners are obliged to accept our principles of conduct as a basis for cooperation unless they have their own compliance standards that are considered equivalent. If violations of the principles of the UN Global Compact or legal requirements become publicly known, we will take the action we consider to be necessary.

**Among other things, a sanctions screening is carried out to check our business partners.** The information on our business partners is compared with relevant sanctions lists, among other things, before entering into a business relationship and during the business relationship. This helps to reduce legal, regulatory and reputational risks for RWE.

All potential trading partners are checked in a standardised and multi-stage process – the Know Your Counterparty (KYC) process – before we enter into business relationships with them on the wholesale market. As part of this process, we use various information systems and channels as well as international databases to check whether there are any indications of possible misconduct on the part of our trading partners. In case of findings, we take appropriate, risk-based measures.

**As part of its risk-oriented audit planning, Internal Audit regularly includes various principles of our Code of Conduct as areas to be audited.** If audits within the Group companies reveal indications of violations, these are reviewed and, where necessary, systematic remedial measures are initiated.



## Compliance-Awareness of our employees #TEAMRWE

**A strong compliance culture within the Group is very important to us.** The main objective of the CMS is to permanently anchor compliant behaviour in the thoughts and actions of our employees and to strengthen the compliance culture in the Group in the long term. Our employees are therefore regularly sensitised to compliance topics in trainings. They are shown adequate behaviours and measures that they can apply in their professional environment.

**Our training concept includes various formats.** As part of the onboarding process, employees take part in a web-based training course that covers a wide range of compliance topics and provides basic knowledge of our guidelines. In addition, all employees receive a mandatory web-based compliance training every year with a varying focus topic. In 2024, the focus was on “Anti-bribery and anti-corruption”. Another component of the training concept is classroom training, which is provided depending on demand and target groups based on the risk classification of certain areas of activity. The executive and management boards are also involved in this training concept.

**In addition, the compliance awareness of our employees is strengthened by regular, Group-wide communication.** During the course of the year, we provide information on current developments, our Group Directives, requirements for compliance-adequate behaviour and potential risks of violations. For this we use a wide variety of communication channels and formats to reach all employees. In 2024, the focus was on the topics of whistleblower protection, anti-corruption and invitations to major sporting events.

**Our managers serve as role models.** It is therefore their responsibility to embed a compliance culture in their area of responsibility and to ensure that our compliance requirements and processes are adhered to. Each executive is required to report on the implementation of the Code of Conduct. This so-called Executives' Compliance Reporting is carried out annually in order to create transparency with regard to adherence on the Code of Conduct and to obtain an overview of compliance awareness at RWE. In 2024, we again achieved a response rate of 100 %.

## Acting together responsibly

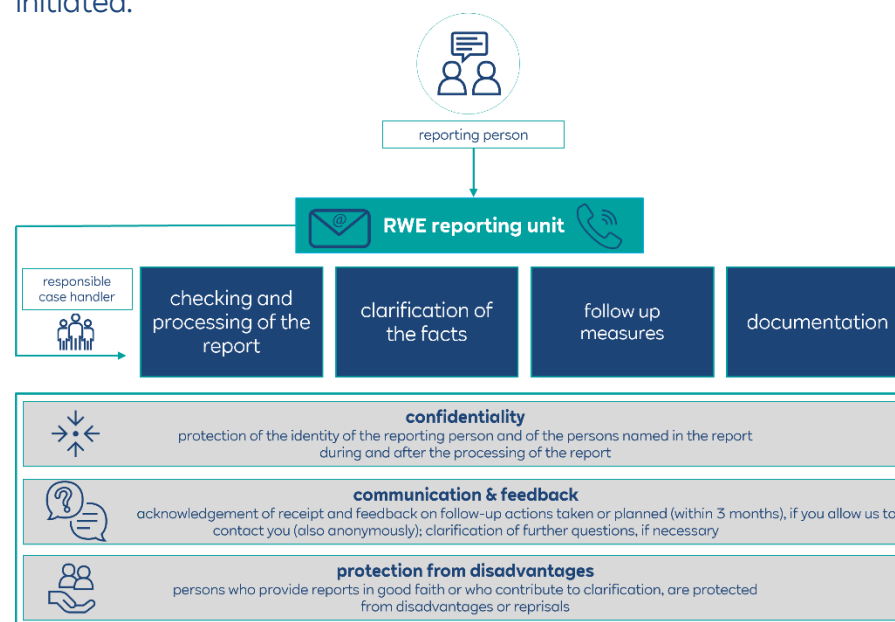
### We offer a secure environment

#### We encourage our employees to report indications of potential violations of the Code of Conduct or non-compliant behaviour.

In the event of suspected or actual violations of the law, employees and third parties, such as suppliers or other business partners, can use whistleblower channels to inform those responsible for compliance. A report is possible, for example, via a Group-wide web-based whistleblowing system or an independent external contact person. Thereby, they can choose to remain anonymous.

Throughout the entire process, we ensure the greatest possible protection for whistleblowers in accordance with the relevant national regulations. Whistleblowers who act in good faith or who contribute to clarification will not suffer any disadvantages as a result of the report. Actions or omissions in connection with professional activities that are a reaction to a report or disclosure and that cause or may cause an unjustified disadvantage to the whistleblower will not be tolerated. In connection with the processing of reports, we also ensure the highest level of confidentiality by protecting the identity of the whistleblower. Likewise, we take into account the interests worthy of protection of the persons affected by a report.

**We promptly and appropriately follow-up on all relevant indications of possible compliance violations.** The information received is checked by the Group functions responsible for the investigation. Where necessary, remedial measures are then initiated as part of a systematic follow-up process. If compliance violations are identified, necessary and appropriate measures are initiated.



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