

# Human Rights Policy

*wpd GmbH*

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## ACRONYMS AND ABBREVIATION

| ACRONYM  | DESCRIPTION   |
|----------|---|
| E&S      | Environmental & Social  |
| ESG      | Environmental, Social & Governance  |
| HRDD     | Human Rights Due Diligence  |
| IFC      | International Finance Cooperation   |
| OECD MNE | OECD Guidelines on Responsible Business Conduct for Multinational Enterprises |
| UN       | United Nations  |

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## 1. INTRODUCTION

The notion of sustainability and socially aware treatment of people and our environment are important to wpd GmbH (hereafter wpd). For that reason, wpd is not only contributing to the supply of green electricity and the energy transition towards renewables, but also strives to ensure socially responsible business conduct. We thus commit to respect the human rights of all persons who can be adversely impacted by our corporate activities and implement human rights due diligence, in line with the standards described below. Our company is driven by its commitment to ensure that the people, workers, and communities that support our entire value chain are treated with dignity and respect.

This policy applies to all our business areas, entities, subsidiaries and employees<sup>1</sup> and workers<sup>2</sup> globally, covering activities both at the corporate level and throughout the lifecycle of our projects. We actively communicate our commitment to respect human rights to all suppliers and business partners and expect them to uphold the same standards.

## 2. COMMITMENT TO RESPECT HUMAN RIGHTS

Our commitment to respect human rights is guided by the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises (OECD MNE), the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights), the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the Convention concerning Indigenous and Tribal Peoples – International Labour Organisation (ILO) Convention n. 169 and the UN Declaration on the Rights of Indigenous Peoples (UNDRIP). In addition to these standards, our projects are guided by the requirements set in the Equator Principles 4 and the IFC Performance Standards on Environmental and Social Sustainability, as applicable.

These core references inform our approach to conducting human rights due diligence across our own operations and business relationships. Wpd and all its entities are required to comply with national legislation in all countries of our operations, and, in cases where local laws are less stringent than international standards, we will seek to apply the highest applicable standard.

## 3. OWN WORKFORCE

When it comes to ensuring inclusive work environments and respecting the rights of workers, we strive to operate in alignment with the following principles and prohibitions:

- Strict prohibition for the use of child labor, by following clear national and international requirements on minimum age employment, and conditions for engagement of young workers.
- Strict prohibition of all forms of forced labor, modern slavery, any type of bonded or involuntary labor or any form of human trafficking, by ensuring employment rights are respected and communicated (in local language, as applicable).
- Respecting the right to associate and bargain collectively, without retaliation and/or discrimination against those who organize or participate.

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<sup>1</sup> A person hired by wpd. An Employee is also defined as a Direct Worker.

<sup>2</sup> Refers to a person engaging with wpd as a Direct Worker, as a Contracted Worker engaged through third parties to perform work related to core business, or as a Value Chain Worker.

- Applying the highest standards of safe working environment, through implementation of occupational health and safety measures, preventing work-related accidents, incidents and diseases through internationally accepted safety procedures.
- Ensuring clean and dignified living and sanitary conditions, as well as respecting rest time and working hours.
- Promoting equal and non-discriminatory recruiting, promotion and compensation practices.
- Building a diverse and inclusive workplace, free from any type of harassment and discrimination, ensuring equal opportunities for workers and employees, regardless of their gender, religious or cultural beliefs, sexual orientation, disabilities and nationality.
- Ensuring transparent and adequate payment of wages.
- Ensuring heightened protection of temporary and/or migrant workers by fostering non-discriminatory behaviors, social inclusion and cultural understanding at the workplace.
- Prohibiting any disproportionate or abusive use of force by private or public security forces.
- Recognition that privacy is a fundamental human right, thus ensuring that management and employees must respect the applicable laws and valid company principles of data privacy for employees, customers, investors and business partners, and apply the necessary diligence to protect sensitive data.

We seek to establish commercial relationships with suppliers that share and adhere to these principles and prohibitions and commit to implement effective human rights due diligence to prevent, mitigate and remediate harms to workers in their operations and supply chains. We expect our suppliers to set the same standards and engage with their own suppliers to prevent and mitigate risks and impacts.

## 4. LOCAL COMMUNITIES

We are committed to respecting the rights of communities where we operate and expect the same from our suppliers and business partners.

We recognize that communities near our offices, project sites, infrastructure, or transport routes may face risks associated with our activities. These risks can include environmental and social impacts occurring throughout the lifecycle of our projects. Similarly, communities within our value chain may experience risks arising from the actions of our direct and indirect business partners.

### **Environmental justice:**

We are dedicated to preventing or mitigating environmental and social impacts, with special attention to vulnerable groups, including Indigenous Peoples, who may be disproportionately affected. Our environmental, health, and safety and security policies adhere to the highest standards to protect the health and wellbeing of communities where we operate. We strive to prevent disruptions to ecosystem services that communities depend on, engaging stakeholders early in project development to ensure comprehensive assessments of these services.

We also deeply value the role of Indigenous Peoples and local communities in conservation efforts and respect their perspectives. We work to avoid any negative impacts on their tangible and intangible cultural heritage and affirm their right to Free, Prior, and Informed Consent (FPIC).

### **Human Rights Defenders:**

We recognize the significant risks faced by human rights defenders, including threats, intimidation, and violence. We foster open dialogue and collaborative partnerships and strongly oppose any actions that suppress their advocacy for human rights protection and respect.

## 5. OUR HUMAN RIGHTS DUE DILIGENCE APPROACH

Aligned with evolving standards and regulations, wpd has developed an internal Human Rights Due Diligence Guidance that provides guidelines and instructions on how to follow the key human rights due diligence steps as foreseen in the United Nations Guiding Principles on Business and Human Rights (UNGPs): (a) assessing actual and potential human rights impacts, (b) defining prevention and mitigation measures for identified adverse impacts, (c) tracking the implementation of these measures and their effectiveness, (d) communicating on how we are addressing impacts and (e) providing for or cooperating in remediation when appropriate. We are continuously building our capacity to strengthen our human rights due diligence processes and implement them across our operations.

## 6. APPROACH IMPLEMENTATION

To ensure we adequately embed human rights due diligence (HRDD) across our operations, we partner with third party experts to identify our opportunities for improvement and develop human rights action plans.

Our projects go through Environmental and Social Impact Assessments (ESIAs) prior to project development to identify potential risks and define prevention and mitigation measures, including for human rights impacts. Our Environmental and Social Management System (ESMS) has been updated to integrate the HRDD Guidance and is continuously improved, including through measures foreseen in human rights action plans.

Wpd constantly trains and empowers its working force in Environmental & Social (E&S) topics related to their specific activities to strengthen corporate shared E&S culture and commitment.

Wpd has processes in place to communicate expectations to third parties we work with and we are committed to monitor their conformance with our policies and contractual arrangements, for example our Code of Conduct is a constituent part of our supplier and subcontractor framework agreements.

In the event of potential human rights impacts, wpd is committed to evaluate the gravity of the situation, as well as collaborate with business partners to provide an adequate response and remedy (when applicable).

Wpd recognizes that the key to effective policy implementation is ongoing tracking, monitoring, and reporting on progress and management of concerns related to human rights. In this regard, wpd continuously works to find the best solutions to track, document and communicate implementation and performance of human rights due diligence. To achieve this, we are embedding human rights reporting within our overarching Environmental, Social & Governance (ESG) framework.

## 7. STAKEHOLDER ENGAGEMENT

Addressing human rights risks requires ongoing external engagement to drive positive outcomes. Effective stakeholder engagement involves proactive collaboration and incorporating diverse perspectives into the decision-making process. As such, where applicable, wpd project teams consult and keep stakeholders informed about their activities through a transparent, timely and two-way communication process and provides direct or anonymous channels for community members and other external stakeholders to raise grievances or suggestions.

We recognize that barriers to engagement and communication can impact stakeholders in diverse ways. Therefore, our processes are guided by the principles of inclusivity and non-discrimination.

## 8. GRIEVANCE MECHANISMS AND REMEDIATION

Any violations of this policy or any grievances regarding actual or potential human rights impacts can be reported through our grievance channels.

Wpd offers a corporate Reporting System open to anyone who would like to report concerns about actual or suspected misconduct that can affect our company or the well-being of people. Information on how to report is publicly available on our website. This system offers an anonymous platform, operated by an independent third-party, that is open 24/7. Wpd commits that no retaliation will occur against the complainant.

We also require a project-based grievance mechanism to be implemented for our international projects.

Wpd is committed to ensuring that every report is thoroughly heard and investigated to the best of our ability.

We will provide effective and prompt remediation whenever we are causing or contributing to an adverse impact. In cases where impacts have been caused by one of our business partners, we commit to engage with the partner to the extent possible to follow up on remediation. If the nature of the allegation is criminal in nature, or could be considered criminal in nature, we will work actively with the relevant law enforcement agency concerned.

Wpd is committed to continuous learning and enhancing the effectiveness of our grievance mechanism channels as a means to prevent harm and build trust with stakeholders across our value chain.

## 9. OVERSIGHT AND ACCOUNTABILITY GOVERNANCE STRUCTURE

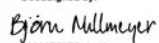
Through continuous improvement, wpd strives to ensure we consistently attain the highest standards with regards to human rights respect, hence we regularly review our policies and procedures considering lessons learned and the effectiveness of our processes.

Wpd has appointed a Human Rights Officer, whose responsibility is to ensure human rights due diligence compliance with current and emerging regulations. In addition to this, our ESG Sustainability Department is responsible to routinely review our policies, ensure implementation of due diligence processes, monitor effectiveness of implemented measures and regularly provide updates on progress to wpd's leadership.

Wpd collaboratively developed this policy by engaging with external human rights experts and internal stakeholders. The policy is reviewed and updated at least every 24 months or whenever a significant change occurs. As part of the review cycles, we consider inputs from internal and/or external human rights experts, results from engagement and consultation processes that have taken place at the project level with workers and communities and indicators from our grievance channels. Revisions of this policy must be approved by management.

Effective date: 01.01.2025

DocuSigned by:

  
Björn Nollmeyer

Managing board / CFO  
wpd GmbH

| Version | Date       | Originator                      | Review                          | Approval       | Description                      |
|---------|------------|---------------------------------|---------------------------------|----------------|----------------------------------|
| 0       | 01.01.2025 | ERM GmbH                        | ESG & Sustainability Department | Managing board | wpd GmbH: Human Rights Policy    |
| 1       | 15.06.2025 | ESG & Sustainability Department | ESG & Sustainability Department | Managing board | Update of reporting in section 6 |