



wintershall dea

Wintershall Dea's policy statement on human rights

MESSAGE FROM THE BOARD



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At Wintershall Dea, we are committed to shaping the future of the energy industry and tackling climate change. We are on the path to becoming a leading European independent gas and carbon management company.

Our sustainability framework

Sustainability is an integral part of our strategy and a cornerstone of our business model. We govern the company responsibly, we strive to mitigate the risks we see, and we communicate in a transparent manner. By doing so, we not only secure our license(s) to operate but also strengthen our investment case for our shareholders.

We stand by four values: we trust, we care, we are open-minded and we are brave. These values guide our actions, not just within our organisation, but in our interactions with our stakeholders and partners.

Taking human rights seriously

We respect human rights, prioritize the well-being of our employees, and are committed to the local communities where we operate. Our Global Code of Conduct sets the standard for all our employees and members of management bodies, emphasizing the importance of respecting human rights as a binding requirement.

In our pursuit of responsible practices, we view human rights due diligence as an ongoing learning journey. It is a pathway that enables us to better understand and manage the positive and negative impacts we may have on people. As a global company, we rely on various business partners – including our concession and joint venture partners, contractors and suppliers – and we trust that they share our values. We expect them to uphold internationally recognized human rights standards and cascade these expectations throughout their own partnerships.

Outlook for the future

Our vision for the future is one where we systematically manage opportunities and impacts, hand in hand with our partners. We are committed to fostering responsibility, respecting human rights, and sustainable development together.

We understand that everyone at Wintershall Dea has an essential role to play in upholding human rights. We strive constantly to increase our knowledge and understanding on human rights impacts, put our commitments into practice and make year-over-year improvements.

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01. INTRODUCTION



Wintershall Dea searches for and produces natural gas and crude oil worldwide – as a reliable partner and with an ambitious team.

We are transforming to become a leading European independent gas and carbon management company whose strategy focuses on a broad portfolio to deliver profitable growth. At the same time, we are securing lower-carbon energy and contributing to the energy transition.

Respecting human rights and protecting the environment is an important element of how we assume our social and societal responsibility.

We value and treat people equally regardless of their nationality, ethnicity, gender, sexual orientation, age, disability, beliefs or any other status.

As one of our core values, we care for our people, the environment, our assets and our capital. We accept responsibility, act on it, do not shy away from difficult conversations and weigh our decisions carefully. Safe operations that pose no threat to people and the environment are our priority.

While states have the duty to protect human rights, we understand our responsibility as company in respecting them. Our ambition is that our own business activities as well as our supply chains are free from human rights violations. We continuously develop processes to identify, assess and address negative impacts on people or the environment and aim for a dialogue-based and preventative approach.

We aim to be a good neighbour and citizen, respect communities' rights and help to meet the needs of residents as well as the development of sustainable livelihoods. We acknowledge and respect the individual's connection to land, natural resources and water. Further, we recognize and respect in particular cultures, histories, and rights of indigenous people who may be particularly vulnerable to resource activities in many parts of the world.

02. OUR COMMITMENT

We consider respecting human rights as a central element of our corporate responsibility. Through the Policy statement hereof, we are committed to respect internationally recognized human rights and protect the environment in our own operations. The same we expect from our business partners – we trust and encourage our business partners to share our approach and to take on their responsibility to respect human rights along the value chain.



We support and we are guided by the following international standards:

- > [Universal Declaration of Human Rights](#),
- > [International Covenant on Civil and Political Rights](#),
- > [International Covenant on Economic, Social and Cultural Rights](#),
- > [ILO Declaration on Fundamental Principles and Rights at Work](#),
- > [UN Guiding Principles on Business and Human Rights](#),
- > [OECD Guidelines for Multinational Enterprises](#),
- > [ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy](#),
- > [Ten principles of the UN Global Compact](#).

We acknowledge the sovereignty of states and their role to stipulate laws. States have the duty to protect human rights and companies the duty to respect human rights. We adhere to all applicable laws and regulations.

Our commitment to respect internationally recognized human rights is defined in our [Global Code of Conduct \(CoC\)](#) and is applicable to all our employees and members of management bodies. We uphold our standards worldwide, even where this exceeds local legal requirements.

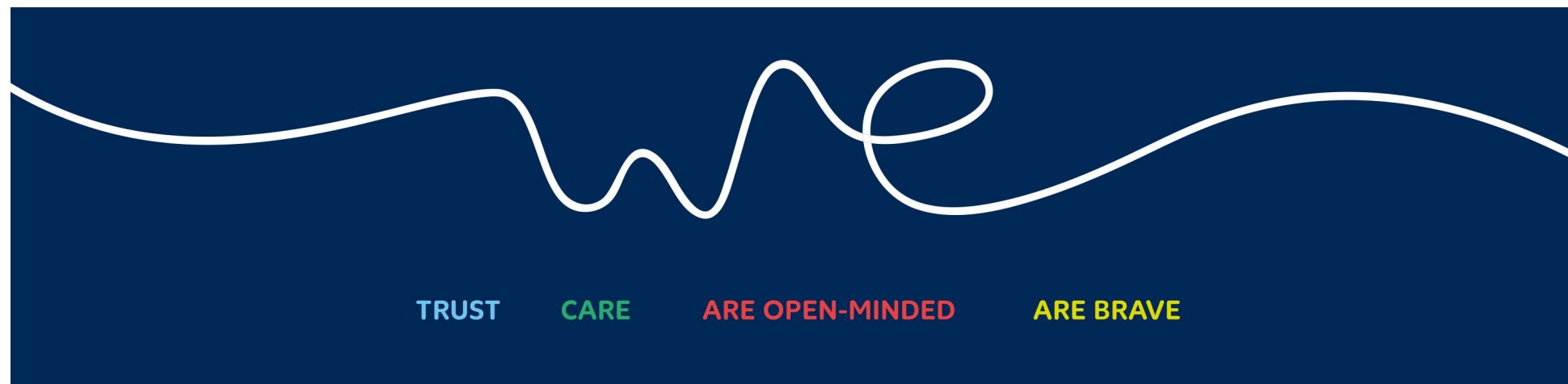
When faced with conflicting requirements or standards, e.g. in countries

where domestic laws, rules, or customs deviate from international standards, restricting or contradicting the latter, we apply the international standards as far as local law allows.

We clearly reject any form of child or forced labour or discrimination and aim to prevent and avoid human rights violations.

To strengthen the sustainability performance of our supply chain we collaborate and aim to foster respect for human rights in relationships with them. For our suppliers, we describe our expectations in more detail in our [Supplier Code of Conduct](#).

03. IMPLEMENTATION



OCCUPATIONAL HEALTH AND SAFETY

Creating a safe and healthy working environment is crucial in securing our licenses to operate. We have implemented HSEQ management systems in our own-operated operations and facilities to provide a systematic approach for managing health and safety. Global processes and requirements are in place, including those related to risk and hazard assessments, contractor management, as well as incident reporting and investigation. Safety induction, talks, emergency training courses and exercises, awareness workshops and seminars take place on a regular basis for employees and contractors. In addition, periodic occupational safety audits are conducted on-site.

LABOUR AND SOCIAL STANDARDS

As a signatory to the Diversity Charter, we have entrenched Diversity, Equity & Inclusion (DE&I) in our business activities and corporate culture and respect the individuality of our employees in every dimension. We go beyond the minimum statutory requirements regarding freedom of association, collective bargaining agreements and social partnerships, fair pay and fringe benefits in accordance with local market conditions, reasonable working hours and paid vacation, and proportionality in disciplinary measures. Wintershall Dea is the first energy company worldwide that received the globally valid EQUAL-SALARY certification. At Wintershall Dea, employer and employee representatives engage in open and honest dialogue.

ENVIRONMENTAL PROTECTION

We are aware of the potential environmental impacts of our business activities. Therefore, we systematically manage environmental protection aiming to avoid or minimize the impact. We actively manage water issues and seek to reduce freshwater consumption, we strive to preserve biodiversity and natural ecosystems in the regions where we are active and manage and reduce waste and effluents effectively across our operations by applying the waste hierarchy. Before initiating new projects or constructing new facilities we conduct environmental impact assessments, and we carefully consider the potential adverse environmental effects of our activities during the lifetime of a project.



COMMUNITIES

Where we have operations, we contribute to the development of the local community and aim to achieve and maintain strong relationships. We identify relevant stakeholders in own-operated projects and aspire to consult with them throughout the project cycle. We transparently inform them of our plans and seek to ensure that they are engaged. To guarantee a trustful and collaborative environment, we provide access to grievance mechanisms.

We recognize and respect the particular cultures, histories, and rights of indigenous people who may be particularly vulnerable to resource activities in many parts of the world. We follow national law on indigenous consultation and endeavour to attain free, prior and informed consent (FPIC) wherever necessary.

With our community investments we want to enable the creation of social impact in society. Opportunities

are identified and carried out in consultation with representatives of the local community and other stakeholders.

Our social investments include donations, sponsorship, the contribution of our expertise, the personal involvement of our employees and participation in community development programmes focusing on the areas of education, science, culture and social issues. In doing so, we choose specific measures and projects together with local stakeholders, e.g. authorities and community representatives.

RESPONSIBLE PARTNERSHIPS

When selecting and working with our business partners, we also consider their performance with regards to safety, health, environment, social standards, and fair business practices.

To maintain the quality of our supply chain, we have processes in place that identify and manage risks using control and performance measures.

With our strategic suppliers, we conduct regular meetings to discuss their performance and relevant aspects of sustainability. Our focus, generally and in all processes and measures, is on supplier development and maintaining a fair dialogue with partners, all in the interest of continuous, long-term collaboration.

Moreover, we are an active member of industry peer forums, such as IPIECA's Supply Chain and Human Rights Working Group, supporting the development of further best practices. Where appropriate, we support our partners, suppliers, civil society, or cross-industry initiatives in managing related challenges together.

04. DUE DILIGENCE APPROACH

4.1 RISK MANAGEMENT

Human rights and corresponding environmental standards are an integral part of our Business Management System, allowing us to identify, assess, reduce and monitor risks and impacts and identify opportunities. We understand due diligence as a continuous improvement and learning process and pursue in particular a preventive character of the risk management system. During all steps of the due diligence, responsible parties are required to take into account the perspective of (potentially) affected people, especially by considering concerns raised via our grievance mechanisms or other forms of stakeholder engagement.

The responsibility and accountability for the management of human rights issues and the implementation of our commitments extend across Wintershall Dea. This includes the entire Management Board, having the overarching accountability.

Our appointed Human Rights Officer reports regularly to the Management Board and is responsible for monitoring our human rights risk management. At Corporate level a Corporate Human Rights Coordinator coordinates the implementation of appropriate processes within the company, supported by a substructure consisting of respective corporate units and business units with dedicated responsibilities (Local Human Rights Coordinators) for implementing due diligence in their daily operations.

4.2 RISK ANALYSIS PROCEDURE

Our risk analysis is built on a risk-based approach that identifies risks in our own operations and supply chains. We conduct a corporate wide risk analysis to evaluate human rights and environmental-related risks.

Based on external data such as country- and sector-specific risks we create a comprehensive overview of the potential risk exposure of our own business area and suppliers. We continue with a concrete analysis by engaging with relevant internal and external stake-

holders, where possible. According to our risk prioritization we focus our capacities where we identified the biggest potential negative impact and greatest leverage to improve with our measures.

The risk analysis is carried out at least annually. An ad-hoc risk analysis is performed when a significant change or a significantly expanded risk situation is expected.





4.3 PREVENTATIVE MEASURES

If our risk analysis reveals human rights or corresponding environmental risks, appropriate preventative measures will be developed and implemented. We set a clear focus on preventing negative impacts before the risk can materialize and it is our aim to protect (potentially) affected people.

Own operations

We continuously strive to improve respective processes and train our employees in various ways to gain knowledge and ensure awareness. Our subject matter experts implement clear principles as well as management and monitoring systems to address potential risks.

Business partner

Within direct business relationships we have implemented assessment processes to consider social and environmental aspects in the selection of our partners. Additional preventive measures vary depending on the context. Where relevant and appropriate, we include our expectations in contractual agreements, continuously engage with direct partners or conduct on-site assessments or audits.

We expect our direct partners to use their best efforts to introduce sustainability standards among their suppliers and contractors.

4.4 REMEDIATION MEASURES

We take great care to prevent any violations from occurring. Should a violation of a human rights be detected despite all efforts, Wintershall Dea will take appropriate actions.

In our own operations we would take measures that would immediately end the violation. Within direct business relationships we would engage with the partner to agree on joint corrective action plans in case immediate mitigation or termination of the violation is not possible.

If a violation occurs within indirect business relationships, we will use our leverage to the extent possible to – together with our direct business partner – agree on a corrective action plan

4.5 REGULAR EFFECTIVENESS REVIEW

Our human rights approach, and the procedures to implement our human rights due diligence system, are continuously observed in order to be risk-based, appropriate and effective. A review of the procedure takes place at least once per year. Further changes may be considered ad hoc, when circumstances require it.

05. GRIEVANCE MECHANISM

We offer channels for raising concerns or inform about potential or actual human rights violations. Besides the possibility to contact us in person, in writing, electronically or by telephone, we have implemented our groupwide [whistleblower system SpeakUp](#). Grievances can be reported by internal as well as external stakeholders including but not limited to own employees, workers in the value chain and communities.

Detailed information on SpeakUp and the options for submitting a report can be found on our [Compliance website](#).

When receiving grievances we take great care to involve the responsible focal points with the required case-related expertise while ensuring confidentiality and anonymity.

We strive to maintain dialogue based case-handling by keeping complainants informed throughout the process and prohibit any retaliation towards complainants who raise grievances in good faith.

Where needed, we implement preventive or corrective measures and strive to provide remedy to the ones affected.



06. STAKEHOLDER ENGAGEMENT

We believe that the understanding of and engaging with relevant stakeholders that may be affected by or do affect our business is crucial for identifying risks, evaluating effectiveness of measures, and creating a positive business environment around all our activities. Internally, we inform our employees via various established dialog-oriented communication channels (e.g. newsletter, intranet, management updates, talks). We want to inform on a regular basis as well as give our employees the opportunity to ask questions and talk about concerns.

Prior to the start of new projects and during project-cycles, we inform relevant stakeholders about planned and ongoing activities and provide a platform for dialogue and consultation (e.g. open house events at production sites, workshops, information offices, press and public relations activities, guided site tours).

Our stakeholder engagement activities serve as basis for our risk analysis and support defining appropriate and effective measures as far as possible.



07. COMMUNICATION AND REPORTING

We report about sustainability developments including human rights in our Annual Report and Sustainability Report.

Further information on our commitment and due diligence can be found on our [website](#). We provide detailed updates on our projects and activities through local informational or open day events.

Internally, we communicate about our human rights commitment and efforts via intranet and our sustainability report. The Management Board is updated and involved in discussions within our Sustainability Board Committee as well as Stakeholder Advisory Panel.

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