

## Wintershall Dea Company Survey Business and Human Rights Resource Centre

### Nature of involvement

- 1. How long has your company or subsidiary been operating or investing in Russia? In summary, can you briefly describe the nature, sector, scale, and geographic area of these operations or investments?**

### Assessing risks

- 2. How is your company enhancing its due diligence to identify, prevent, and mitigate heightened human rights risks and comply with international humanitarian law?**
  - a. What measures is your company taking to ensure it relies and acts upon robust monitoring of the situation, including through consultation with your workers, affected communities, human rights groups, and/or humanitarian organizations?

### Mitigating risks and tracking effectiveness

- 3. As the situation in Ukraine unfolds, is your company or subsidiary planning to cease operations in or divest from Russia?**

If so:

- ~~a.—What have been the key considerations informing this decision and did you consult with your workers and/or other affected stakeholders as part of your decision making process?~~
  - ~~b.—What are the immediate and longer-term steps that your company has taken or is prepared to take to mitigate any negative impacts of your exit on affected communities and your workers, including addressing any loss of income?~~
- 4. If your company or subsidiary chooses to continue operating in Russia, what human rights due diligence has been undertaken and how are you planning to mitigate harm in Ukraine?**
  - 5. What kind of due diligence measures does your company use to ensure that it does not have any business relationships with sanctioned Russian individuals and entities? Beyond sanctions compliance, how does your company ensure that it does not have any business relationships with individuals or entities with a track record of rights violating conduct?**

## **Exercising leverage**

- 6. How does your company intend to use your leverage to protect the rights of your workers and communities affected by your operations in Russia, including freedoms of association and expression?**
  
- 7. Is your company providing any support to Russian activists who are taking action against the war and in support of democracy and peace in Ukraine.**

## **Answer**

### **Activities in Russia**

Wintershall Dea is active in Russia since 30 years and is today involved in three onshore gas production projects in Russia. The Urengoykoye field is located some 3,500 kilometers northeast of Moscow, near the city of Novy Urengoy in the Yamal-Nenets Autonomous Area. There, the Achimgaz joint venture founded in 2003 produces natural gas from the Achimov formations in Area 1A. Wintershall Dea has a 50 per cent stake in this project, with the other half held by Gazprom's subsidiary OOO Gazprom Dobycha Urengoy. Another joint project, Achim Development, is developing Area 4A/5A. The company has a 25,01 per cent stake, the rest is held by Gazprom. Further south and also in the Yamal-Nenets Autonomous Area lies the Yuzhno-Russkoye field, in which Wintershall Dea has a stake via the Severneftegazprom joint venture. Wintershall Dea has a 35 per cent share in the economic success of the field.

### **Assessing risks:**

As stated in our Human Rights Statement, which is part of our ESG Principle, our human rights due diligence process is the basis to address our impact on human rights wherever we operate. The holistic human rights due diligence process was established to systematically integrate human rights criteria for assessing, monitoring and complying with human rights standards into our evaluation processes, e.g. for suppliers, contractors, projects and training. Our aim with this process is to learn more about the context of our operational business activities, projecting how our activities could actually or potentially have adverse impacts and adequately addressing our most salient human rights risks in particular. We are publicly reporting about our human rights activities and sharing our experiences in different channels. We have established worldwide grievance mechanisms that provide access to both internals, such as employees, as well as external third parties, such as business partners and local communities in the vicinity of our sites. On a global level, the whistle-blower system SpeakUp is available. On an operational level, multiple communication channels are in place, reflecting local needs. All complaints received are reviewed and, if justified, suitable measures are taken to address the issue.

## **Mitigating risks and tracking effectiveness**

As a consequence of the Russian President's war of aggression against Ukraine, Wintershall Dea AG's Management Board has decided:

- not to pursue any additional gas and oil production projects in Russia, and to stop all planning for new projects.
- to basically stop payments to Russia with immediate effect.
- to write off its financing of Nord Stream 2.

Wintershall Dea remains involved in the existing Yuzhno Russkoye and Achimov natural gas production projects in Siberia. The projects produce natural gas for European energy supply.

The situation in respect to sanctions is continuously monitored and all applicable legal regulations are strictly followed. Organizational measures are adopted and special IT tools are used for regular business partner compliance due diligence to ensure that the applicable sanctions are followed and to identify potential business partners with negative compliance track records.

In addition our Business Unit Russia is evaluating the safety and security situation for its staff constantly and providing updates to all colleagues working in Russia regularly. A local crisis team has been set up to evaluate and manage the situation. It is in close contact with the global HSEQ Security Team to coordinate all activities.

## **Exercising Leverage**

The General Works Council, the Executive Representative Committee and the Management Board of Wintershall Dea stand with victims and sent a joint signal for peace and freedom where Wintershall Dea call for solidarity with Ukraine and an immediate halt to the ongoing hostilities in a joint statement.

Wintershall Dea is providing a total of one million euros for emergency humanitarian aid for the war in Ukraine and is matching every employee donation that is transferred to its own Wintershall Dea Foundation for Democracy and Diversity. The aid organisation "action medeor" as first institution received emergency financial aid from Wintershall Dea's humanitarian donation - for medical care for people in the war zone in Ukraine and in neighboring Moldova.

In addition to "action medeor", the cities of Hamburg and Kassel, where Wintershall Dea has its headquarters, will also be supported with funds from the company donation to provide help in setting up refugee accommodation.

Generally, detailed assessments of risks and the developmental, social and ecological impacts of our projects including environmental and social impact assessments take place followed by agreed actions plans.

For instance Wintershall Dea used its influence in the Russian JVs to have a Code of Ethics in place setting out the Company's business values and establishes the essential rules of business conduct based on those values.

So far we also supported the Russian civil society, for instance together with the German Foreign Ministry and the Federal Press Office the training of young Russian journalists. These programs were stopped now from the German government.