

Compliance Report 2017



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Acting in accordance with the law and legal regulations is an integral part of the corporate culture of innogy SE. The principles and goals of this culture are based on the innogy Code of Conduct. The main focus of our Compliance Management System is to identify any structural risks of corruption and to prevent any corruption from occurring in the innogy Group. For all business activities and decisions, we adhere to our strict compliance guidelines. Corruption or any other violations are not tolerated here.

Raising the level of awareness among our employees is the key to preventing corruption. The most important document in this regard is the innogy Code of Conduct, which is binding for all employees. It prohibits all forms of corruption and is tightly integrated with other Group Directives. The Code of Conduct is preceded by ten overall behavioural principles. These principles summarise the Code's main points and permit quick reference. In day-to-day work, adherence to the Directives is supported by organisational requirements such as the four-eyes principle, segregation of duties, authorisation concepts and approval provisions.





Be awake to
your objectives
and principles.

For the practical effectiveness of a compliance organisation, it is of vital importance to create an awareness of critical issues in the work environment. Appropriate communication is therefore highly essential for the success of the compliance organisation. The Group's in-house media (e.g., Intranet site, event-driven newsletters or articles in the staff magazine) are used to inform our employees about compliance matters, such as current developments, behavioural requirements for compliance, and the consequences of violating the compliance rules. Members of our workforce are trained in compliance prevention and avoidance through face-to-face training courses and a web-based training program. In 2017 the web-based training program focused on the issue of dealing with business partners. Participation is obligatory and calibrated according to the risk of corruption associated with the relevant activity. This also includes the Executive Board. In 2017, we have trained all in all more than 3,000 employees across Germany and another 1300 employees in other business regions in face-to-face trainings.

There is always something 'secretive' about corruption offences. To make compliance-sensitive processes more transparent, we implemented an IT tool in 2010 that records all donations, sponsoring activities, compliance-relevant consulting agreements and contributions to public officials that are considered relevant for the purpose of our Directive. This tool is continuously being developed and improved.

face to face training

Our compliance organisation is headed by the Chief Compliance Officer. At innogy, this was Dr Wolfgang Fritzen in 2017. He regularly informs the Executive Board and the Audit Committee of innogy SE about compliance-relevant matters. Compliance Officers from all our operational companies ensure that the Group-wide principles on corruption prevention are implemented uniformly. They report on their activities to the Chief Compliance Officer on a regular basis. In regions where innogy operates multiple subsidiaries, compliance tasks are bundled for processing by regional representatives.

The Group's Internal Audit department regularly carries out preventive compliance audits in the Group companies. We thus monitor both the implementation and the efficacy of our compliance management on a Group-wide scale. Indications of compliance violations are examined and corrective measures are undertaken as necessary.

indications are treated confidentially

Indications of possible violations can be communicated to superiors or to Compliance Officers. An independent external point of contact is available to receive indications from employees and third parties alike. Reports can be submitted in the applicable language of the respective innogy Group company; they are treated confidentially as well as anonymously where so requested.

The law firm Simmons & Simmons has been acting as an external point of contact for the Group since 1 April 2011, partially supported by local law firms.

KPMG has audited the Compliance Management System for corruption prevention in accordance with the audit standard IDW PS 980 drawn up by the German Institute of Auditors. The efficacy audit was successfully completed at year-end 2013/2014. innogy SE's Compliance Management System is based in full on the established Compliance Management System of RWE AG. In the course of 2018 and 2019, innogy SE strives to obtain a recertification of its compliance management system based on the above audit standard. This audit is intended to also include, for the first time, the areas of export control and prevention of money laundering.



Work transparent.