



Renewable Energy & Human Rights Benchmark 2025 Company Profile

Company name AES Renewables
Sub-sector Project Developer
Overall score 10% weighted average

Section score	Weighting	For section
19%	20%	1. UNGP core indicators
14%	40%	2. Salient human rights risks
0%	10%	3.a Response to risks of exposure to forced labour
8%	10%	3.b Serious allegations
0%	20%	4. Low Carbon Transition Assessment

Please read the disclaimer at the end of this scorecard and refer to the full methodology when perusing this scorecard. The methodology as well as additional analysis can be found [here](#).

The use of the label "Not met" in the research does not necessarily mean that the company does not meet the requirements as they are described in the accompanying bullet point short text. Rather, it means that the analysts could not find information in public sources that met the requirements as described in full in the 2025 Renewable Energy & Human Rights Methodology document. It is possible that a Company meets the criteria without yet publishing the relevant evidence of doing so. This may include cases where a company has claimed to meet the criteria in the engagement phase or otherwise but where the public record was still not sufficient to meet the criteria by the relevant cut off dates.

Detailed assessment

1. UNGP core indicators based on the CHRB methodology (20% of total)

A. Policy commitments and governance

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none">• Met: General HRs commitment: The Human Rights Policy indicates that: 'The AES Corporation adopted a Human Rights Policy in 2016 to formalize our long-standing commitment to uphold and respect human rights'. [Human Rights Policy, n/d: aes.com]• Not Met: Commitment to UNGPs: The Human Rights Policy indicates that: 'our Policy is consistent with the United Nations' Guiding Principles on Business and Human Rights'. However, 'consistent with' is not considered a formal statement of commitment according to the methodology's wording criteria [Human Rights Policy, n/d: aes.com]
A.2	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none">• Not Met: Commitment to ILO core principles: The Human Rights Policy indicates that: 'Our businesses should expect their suppliers to treat their employees well and to interact with communities in ways that respect human rights and adhere to all local laws including the right to collective bargaining, the elimination of forced and compulsory labor, the abolition of child labor, and the elimination of discrimination in the workplace'. However, it is not clear the Company itself commits to these rights. Moreover, the Company is expected to commit to the ILO core areas in all contexts and locations, beyond 'local laws'. In relation to itself it only indicates that 'Our businesses are present in a variety of countries and markets and we expect them to respect the rights of their people in accordance with local labor regulations, including laws relating to freedom of association and collective bargaining'. Furthermore, the Fluence Responsible Sourcing Policy indicates: 'Our responsible sourcing policy respects and incorporates relevant

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>conventions of the International Labor Organization (ILO)'. Fluence is one of the Company's subsidiaries. However, no company-wide publicly available policy statement committing it to respect the human rights that the ILO has declared to be fundamental rights at work found. [Human Rights Policy, n/d: aes.com] & [Fluence Responsible Sourcing Policy, 45323: info.fluenceenergy.com]</p> <ul style="list-style-type: none"> • Not Met: Expects business relationships to commit to ILO core principles: The Human Rights Policy indicates that: 'Our businesses should expect their suppliers to treat their employees well and to interact with communities in ways that respect human rights and adhere to all local laws including the right to collective bargaining, the elimination of forced and compulsory labor, the abolition of child labor, and the elimination of discrimination in the workplace'. The Supplier Code of Conduct adds: 'Suppliers shall comply with all applicable child and forced labor, and working conditions laws (including working hours, wages, etc.) and only employ workers who meet the applicable minimum legal age requirement in the country. Unless prohibited by local law, Suppliers shall grant their employees freedom of association and collective bargaining'. However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates it expects suppliers to grant their employees freedom of association and collective bargaining 'unless prohibited by local law'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Human Rights Policy, n/d: aes.com] & [Supplier Code of Conduct, n/d: aes.com]
A.3	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to remedy adverse HRs impacts: The Human Rights Policy indicates that: 'Our businesses are committed to engaging with their people to continually improve health and safety in the workplace, including the identification of risk and hazards and the remediation of health and safety issues'. However, no commitment found to remedy the adverse impacts on individuals, workers and communities that it has caused or contributed to beyond health and safety in the workplace. The 2023 Improving Lives Report indicates: 'Safety is at the core of everything we do. We always identify potential risks to our people, contractors, customers, partners and communities, and measure success by how safely we conduct our work together while contributing to a greener energy future. [...] Our commitment to safety carries over to all AES employees, including contractors'. It also outlines its community relations. However, no commitment to remedy found and reports are not considered a suitable source for policy statements. [Human Rights Policy, n/d: aes.com] & [2023 Improving Lives Report, 45377: aes.com] • Not Met: Expects business relationships to make this commitment • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms • Not Met: Commitment to work with business relationships on remedy
A.4	Commitment from the top	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Board level responsibility for HRs: The Governance Committee Charter states: 'The [Governance] Committee shall be responsible for the periodic review and oversight of the Company's programs, policies, and practices designed to achieve its goal to act in a socially responsible way related to [...] human rights [...]'. The Committee shall also be responsible for the periodic review and oversight of the risks related to such social responsibility matters'. [Governance Committee Charter, 45200: aes.com] • Not Met: Describes HRs expertise of Board member: The 2025 Proxy Statement indicates: 'Building on her public company and academic experience, Ms. Sebastian developed a strong expertise in enterprise risk management, corporate compliance and responsible corporate, practices.' Ms Sebastian is a member of the Compensation Committee and the Chair of the Governance Committee. However, no further description found of her Human Rights expertise. [2025 Proxy statement, 19/03/2025: d18rn0p25nwr6d.cloudfront.net] • Not Met: Board member/CEO signal importance of HRs in their communications • Not Met: CEO or board incentives: The 2025 Proxy Statement indicates: 'Our NEOs are eligible for annual incentive awards based on pre-established safety, financial and strategic goals under The AES Corporation Performance Incentive Plan'. The Compensation Committee approved performance measures and objectives defined by: Safety - 10%. This strategic goal has the following rationale: 'Create an environment that allows all of our People to return home from work each and every day. Additionally, create an environment in which we continue to educate our employees proactively, test and implement precautions, and maintain business resilience'. Its metrics include Serious Safety Incidents (5%); Non-Injury SIP Rate, Safety Meetings and Safety Walks (5%). Mr. Andrés Gluski is part of the NEOs and he is also a Board member. However, it is not clear the metrics also

Indicator Code	Indicator name	Score (out of 2)	Explanation
			include the health and safety of local communities, or workers in the supply chain. [2025 Proxy statement, 19/03/2025: d18rn0p25nwr6d.cloudfront.net]
A.5	Responsible lobbying and political engagement fundamentals	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Publicly available policy statement(s) (or policy(ies)) setting out lobbying and political engagement approach.: The Company has a Lobbying Policy and a Charitable Contributions and Political Donation Policy publicly disclosed. [Charitable Contributions and Political Donation Policy, 29/12/2020: aes.com] & [Lobbying Policy, 29/12/2020: aes.com] • Not Met: Monetary value of direct political contributions: The Company publishes an annual US Political Contribution Report, disclosing the beneficiaries and the amount. However, it is not clear if it only allows contribution exceptionally. The Charitable Contributions and Political Donation Policy adds: 'Political donations are often subject to local and international laws and regulations. These laws may set strict limits on political donations and require specific reporting of such donations. All charitable contributions and political donations must comply with local and international laws and regulations, including anti-corruption laws, and also must be consistent with the AES Code of Conduct and the AES Values'. The 2023 AES Andes Integrated Report indicates: 'It is important to note that we do not finance political parties, candidates or their representatives. Therefore, no such contributions were made during 2023.' AES Andes is one of the Company's subsidiaries, and the datapoint expects to see company-wide data. The Company is expected to include a disclosure by country, as it only seems to include data on the US Political Engagement Expenditure. At its feedback stage, the Company has also made reference to a document in Spanish, however, only documents written in English are accepted (as evidence covering the whole company is expected). The Company has provided additional comments regarding this indicator. However, its content has not been found in publicly available sources. [Charitable Contributions and Political Donation Policy, 29/12/2020: aes.com] & [2023 AES Andes Integrated Report, 2023: aesandes.com] • Not Met: Monetary value of indirect political contributions • Not Met: Requirement for third-party lobbyists to comply with the Company's lobbying and political engagement policy (or policies): The Lobbying Policy indicates: 'Certain interactions with government officials and their staff, whether by an AES person or a third party acting on AES's behalf, may be considered "lobbying." [...] Because lobbying registration and reporting requirements are complex and often change, please notify the AES Ethics & Compliance Department of any lobbying by your business, whether by an AES person or a third party acting on behalf of AES, prior to engaging in the lobbying activities, so that AES can ensure that it is in compliance with all applicable national, state, and local registration and reporting requirements in the countries in which AES is doing business. [...] Business integrity is a key standard when selecting and retaining third parties to represent AES. We should consider only reputable and qualified individuals and entities as lobbyists [...]. The hiring of third parties to engage in lobbying activities on behalf of AES is subject to the AES Contract Compliance Review Process. AES people are required to conduct reputational due diligence on all individuals and entities to be engaged on behalf of AES and to obtain written approval of the AES Chief Ethics & Compliance Officer in advance of the engagement'. Also: 'all lobbying work must be performed pursuant to a written contract which contains appropriate contract compliance language. In addition, the lobbyist must sign a lobbyist certification that states that the lobbyist agrees to abide by the terms of the AES Compliance Program'. It has specific guidelines on 'fees and payments' and on 'Prohibited Payments: Under no circumstances may an AES person or an outside lobbyist acting on behalf of AES make, offer, give, promise, pay or authorize the offering, giving, making, promising or payments of any money, gift, or anything of value to a government official in exchange for business or unfair advantage'. However, it is not clear if third party lobbyists are formally required to comply with Lobbying and political donation policies, as it is not clear what the Compliance Program entails. [Lobbying Policy, 29/12/2020: aes.com]

B. Embedding respect and human rights due diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1	Responsibility and resources for day-to-day human rights functions	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Senior responsibility for HRs implementation and decision making: On its webpage section Sustainability, the CEO indicates in its message that 'Sustainability is core to both our strategy and our culture'. However, it is not clear the senior manager role accountable for implementation and decision making specifically on human rights issues within the Company. The Company has provided comments regarding this indicator. However, its content has not been found in publicly available sources. [A sustainable future_web, n/d: aes.com] • Not Met: Describes day-to-day responsibility for implementing HRs commitments • Not Met: Day-to-day resources and expertise allocation in own operations • Not Met: Resources and expertise allocation in supply chain
B.2	Identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes process of identifying risks in own operations: The Human Rights Policy indicates: 'Our Human Rights Policy formalizes the tools AES is already using to conduct business, including encouraging our businesses to perform risk assessments [...]'. The 2022 AES Andes Integrated Report notes: 'Since 2020, AES Colombia has begun a self-assessment of its human rights management, starting with its efforts with the indigenous communities of La Guajira, particularly in the development of the Jemeiwaa Ka'l wind project. With the help of consultants KPMG, 66 opportunities for improvement in community relations processes were identified, and a plan was developed and immediately implemented. [...] The evaluation sought to: Assess actual and potential human rights impacts. Integrate the findings in a risk map. Act on those findings to prevent or mitigate potential impacts'. AES Andes is one of the Company's subsidiaries. It further expands on the human rights management program designed as a result of the evaluation. In its feedback the Company has also made reference, to a 2020 report, however, it is considered outdated according to the three-reporting-year timeframe policy. The Company has also provided further comments regarding this indicator, however, it was regarding its suppliers and the datapoint focuses on its own operations. Finally, it has provided additional data; however, its content has not been found in publicly available sources. Although the Company indicates its subsidiary AES Colombia carries out a self-assessment of its human rights management, no further description of the process to identify its human rights risks and impacts was found. [Human Rights Policy, n/d: aes.com] & [2022 AES Andes Integrated Report, 2022: aesandes.com] • Not Met: Describes process for identifying risks in business relationships: The 2022 AES Andes Integrated Report notes: 'Since 2020, AES Colombia has begun a self-assessment of its human rights management [...]'. With the help of consultants KPMG, 66 opportunities for improvement in community relations processes were identified, and a plan was developed and immediately implemented. Subsequently, in 2021, a consultant was hired to design a comprehensive human rights management program for all AES Colombia operations. The management system design included: [...] (iv) the involvement of the value chain through training to raise awareness, identify risks [...]. The evaluation sought to: Assess actual and potential human rights impacts. Integrate the findings in a risk map [...]'. Still in the context of Colombia's Human Rights Management System, the 2023 AES Andes Integrated Report adds: 'Within the context of due diligence and stakeholder engagement, we requested a self-assessment on human rights from all our suppliers and contractors, and we have received 117 responses. The information analysis was conducted with the help of a consulting firm, which identified several risk alerts and opportunities for action to enhance the management of human rights'. However, it is not clear the process to identify its human rights risks and impacts apply to all relevant business relationships of AES or it is only applied to its suppliers in Colombia. The webpage section Contractors & suppliers indicates: 'The AES Ethics & Compliance Program takes a risk-based approach that categorizes suppliers based on the potential risk of the transaction involved. The risk profile of an engagement determines the required pre-engagement due diligence and any conditions of engagement, such as requirements for certifications, acknowledgments, training, and engagement structure'. It also explains its supply base risk management, which has different standards, including: contingency plans, inventory & criticality relation, asset management. Moreover, it notes that: 'Using the following principles, our supply chain professionals drive sustainability and social responsibility excellence across our businesses: [...] Health and Safety [...]. Human Rights: All supply chain procedures and actions must facilitate our businesses' compliance with local labor

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>laws and create the mechanisms that will encourage the observance of human rights and other regulations'. It adds: 'We evaluate new and existing suppliers using a diverse set of tools depending on the complexity or criticality of the transaction. One tool we use is STACE (Safety and Sustainability, Technical, Alignment, Cost, Execution), a scorecard that enables our people to evaluate supplier proposals and performance in a fair and consistent manner. The pre-qualification supplier process includes financial and ESG factors and compliance with laws. Existing suppliers are evaluated and audited for their environmental, safety, and labor practices. Sustainability criteria included in the evaluation process are tailored to the specific location of the work, materials, and/or services provided. These can include environmental and safety metrics and performance, commitment to comply with all applicable labor regulations (such as child or forced labor, working hours, etc.), and other criteria. [...] In addition, all contractors and suppliers working on-site or on behalf of AES should adhere to our safety and environmental standards'. However, no description found of the process it has in place to identify what specific human rights risks and impacts it faces, as a Company, through the supply chain. The latter piece of evidence provided seems to be part of a compliance monitoring process rather than a proactive identification of human rights risks and impacts process. [Contractors & suppliers_ web, n/d: aes.com] & [2023 AES Andes Integrated Report, 2023: aesandes.com]</p> <ul style="list-style-type: none"> • Not Met: Describes risk identification system incl. stakeholder consultation • Not Met: Describes how risk identification system is triggered by new circumstances
B.3	Assessing human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes assessment process and discloses salient HRs risks: The 2022 AES Andes Integrated Report notes: 'Since 2020, AES Colombia has begun a self-assessment of its human rights management [...]'. With the help of consultants KPMG, 66 opportunities for improvement in community relations processes were identified, and a plan was developed and immediately implemented'. In its feedback, the Company provides further information on a workshop in Risks and Actions in Response to Potential Human Rights Violations, on the Supplier and Contractor Program and on self-assessment on human rights for its suppliers and contractors. However, no description found of its process for assessing its human rights risks within its own operations. This description includes how relevant factors are taken into account, such as geographical, economic, social and other factors. [2022 AES Andes Integrated Report, 2022: aesandes.com] • Not Met: Describes how process applies to supply chain: The webpage section Contractors and Suppliers indicates: 'We evaluate new and existing suppliers using a diverse set of tools depending on the complexity or criticality of the transaction. One tool we use is STACE (Safety and Sustainability, Technical, Alignment, Cost, Execution), a scorecard that enables our people to evaluate supplier proposals and performance in a fair and consistent manner. The pre-qualification supplier process includes financial and ESG factors and compliance with laws. Existing suppliers are evaluated and audited for their environmental, safety, and labor practices. Sustainability criteria included in the evaluation process are tailored to the specific location of the work, materials, and/or services provided. These can include environmental and safety metrics and performance, commitment to comply with all applicable labor regulations (such as child or forced labor, working hours, etc.), and other criteria.' The 2022 Improving Lives Report adds: 'During 2022, AES Colombia suppliers were included in the development of the second phase of the human rights management training program'. The 2023 AES Andes Integrated Report states: 'Human Rights Self-Assessment in the Value Chain: Within the context of due diligence and stakeholder engagement, we requested a self-assessment on human rights from all our suppliers and contractors, and we have received 117 responses. The information analysis was conducted with the help of a consulting firm, which identified several risk alerts and opportunities for action to enhance the management of human rights. [...] Building on the human rights program for suppliers and recurring contractors launched in 2021, the Third Phase of the initiative was rolled out in the latter half of 2023, involving 19 companies. The project concentrated on four key areas: (i) child labor; (ii) forced labor; (iii) non-discrimination in the workplace; and (iv) fair labor conditions.' It adds that the AES Colombia's Human Rights Management System includes: 'Contractor Program: Suppliers and contractors are key to helping us respect human rights. Therefore, in a first step, [...] finally, a self-evaluation survey is developed for our contractors to report on their implementation of human rights practices.' Extra information on courses and workshops was provided. However, no description found of a Company-wide process to assess its human rights risks

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>and impacts in its supply chain. [Contractors & suppliers_ web, n/d: aes.com] & [2023 AES Andes Integrated Report, 2023: aesandes.com]</p> <ul style="list-style-type: none"> • Not Met: Public disclosure of results of HRs risk assessment: See above. In the context of the AES Colombia's Human Rights Management System, the Company indicates that 'The project concentrated on four key areas: (i) child labor; (ii) forced labor; (iii) non-discrimination in the workplace; and (iv) fair labor conditions'. However, it is not clear this focus was due to the results of its human rights risks and impact assessments. In its feedback, the Company has also made reference, to a 2020 report, however, it is considered outdated according to the three-reporting-year timeframe policy. In addition, disclosure is expected to be company wide or broken down by activities or locations. [2023 AES Andes Integrated Report, 2023: aesandes.com] • Not Met: Describes how assessment involved affected stakeholders
B.4	Integrating and acting on human rights risks and impact assessments	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes system to prevent, mitigate and remediate HRs issues: The Company has provided a link with information for this datapoint during the feedback stage. However, the link did not work • Not Met: Describes how global system applies to supply chain: The 2023 AES Andes Integrated Report states: 'Human Rights Self-Assessment in the Value Chain: Within the context of due diligence and stakeholder engagement, we requested a self-assessment on human rights from all our suppliers and contractors, and we have received 117 responses. The information analysis was conducted with the help of a consulting firm, which identified several risk alerts and opportunities for action to enhance the management of human rights. [...] Building on the human rights program for suppliers and recurring contractors launched in 2021, the Third Phase of the initiative was rolled out in the latter half of 2023, involving 19 companies. The project concentrated on four key areas: (i) child labor; (ii) forced labor; (iii) non-discrimination in the workplace; and (iv) fair labor conditions.' The Management System is composed of AES Colombia includes: 'Program: Suppliers and contractors are key to helping us respect human rights. Therefore, in a first step, (i) we help our recurring suppliers to design their policies and processes for the respect of human rights. Subsequently, (ii) human rights criteria are incorporated into our bidding processes, with human rights clauses included in contracts and purchase orders; and (iii) finally, a self-evaluation survey is developed for our contractors to report on their implementation of human rights practices.' AES Andes is one of the Company's subsidiaries. Extra information on workshops was provided. However, although the Company indicates the steps it took with one of its subsidiaries regarding Human Rights management, no description found of its global system to prevent, mitigate or remediate its salient human rights issues in its supply chain. [2023 AES Andes Integrated Report, 2023: aesandes.com] • Not Met: Example of actions decided on at least 1 salient HRs issue: The 2023 Improving Lives Report indicates that 'In 2023, more than 21,000 AES people and contractors participated in monthly safety meetings open to all employees and contractors that cover key performance metrics, lessons learned, and relevant safety topics. Another 4,200 AES people participated in online safety training through our digital learning platform'. As a results of its Human Rights Self-Assessment in the Value Chain, which has received 117 responses, it adds: 'The information analysis was conducted with the help of a consulting firm, which identified several risk alerts and opportunities for action to enhance the management of human rights. [...] Building on the human rights program for suppliers and recurring contractors launched in 2021, the Third Phase of the initiative was rolled out in the latter half of 2023, involving 19 companies. The project concentrated on four key areas: (i) child labor; (ii) forced labor; (iii) non-discrimination in the workplace; and (iv) fair labor conditions.' However, it is not clear whether these are actions taken as a result of a due diligence/impact assessment process that has considered safety, child labour, forced labour, non-discrimination in the workplace, and fair labor conditions as salient impacts. The 2022 AES Andes Integrated Report notes: 'Since 2020, AES Colombia has begun a self-assessment of its human rights management, starting with its efforts with the indigenous communities of La Guajira [...]. With the help of consultants KPMG, 66 opportunities for improvement in community relations processes were identified, and a plan was developed and immediately implemented. Subsequently, in 2021, a consultant was hired to design a comprehensive human rights management program for all AES Colombia operations. The management system design included: (i) the review of AES Colombia's human rights policy; (ii) the review of all company processes to identify activities that had a direct or indirect relationship with human rights; (iii) the training of managers and employees; (iv) the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>involvement of the value chain through training to raise awareness, identify risks, advise on the design of the human rights policy and the creation of an environmental impact tool, and the development of a roadmap for the prevention of human rights violations'. It has also provided information on how the Company has redesigned Sustainability, Environment and Investor Relations departments as a response to issues raised by stakeholders and the review of internal and external documentation. However, the specific action taken has to address at least one of its salient human rights issues as a result of assessment processes, in at least one of its activities/operations in the last three years. [2023 Improving Lives Report, 45377: aes.com] & [2022 AES Andes Integrated Report, 2022: aesandes.com]</p> <ul style="list-style-type: none"> • Not Met: Describes how stakeholders involved in decisions about actions taken: Regarding its Safety Management System [SMS], the 2023 Improving Lives Report indicates: 'The SMS establishes the expectation to involve employees in the development and review of policies and procedures to manage and reduce risks, consultations when there are changes that affect workplace health and safety and in representation on health and safety matters. [...] Beyond additional training, some actions might include: measurement of safety culture using perception safety surveys to identify behavioral improvement opportunities; improve effective monitoring and supervision of contractors and share lessons learned from incidents with the contractors in place'. However, no description found of how it involves affected stakeholders in decisions about the actions to take in response to its salient human rights issues in the context of a human rights risks and impact assessment beyond safety.
B.5	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes system for evaluation effectiveness of actions: The 2023 Improving Lives Report indicates: 'Our Safety Management System (SMS) is consistent with the OHSAS 18001/ISO 45001 Occupational Health and Safety Management System model and provides a consistent framework for safety management expectations that apply to all AES employees, as well as contractors working in AES facilities and construction projects. [...] Each operation should establish and maintain a planning process to identify hazards, evaluate risks and implement effective mitigation control measures following the hierarchy of controls (elimination-substitution-engineering— administrative—personal protection equipment). The safety risk assessment process should also be performed prior to starting any activity in the construction of new projects and/or during the due diligence process for new operations. [...] Safety committees at our locations include representation from different levels of staff to discuss safety, foster a culture of safety, and drive performance improvements. The committees monitor the implementation of the SMS, including inspections, observations, audits, and improvement plans. [...] Compliance with the SMS and standards is monitored through internal and external audits. Internal audits are carried every six months, and independent/external corporate audits are carried out every three years. [...] The Speaking Safely Helpline is a secure and anonymous way to report safety concerns or violations without retaliation. The reports are handled by a third-party vendor, to ensure confidentiality'. The Company disclosures health and safety related data. However, this datapoint looks for a system for tracking or monitoring the actions taken in response to human rights risks and impacts, as a result of a Human Rights risk assessment, and for evaluating whether the actions have been effective or have missed key issues or not produced the desired results. Current evidence focuses only on H&S. No further evidence found. [2023 Improving Lives Report, 45377: aes.com] • Not Met: Example of lessons learned from evaluation effectiveness of actions: The 2023 Improving Lives Report indicates: 'Our target is to have zero fatalities. While we continue to maintain zero fatalities for our people since 2020, we regret the loss of a contractor in 2023. We conducted a root cause analysis to understand the circumstances that led to this tragic incident and took measures designed to prevent something like this from happening again'. For more information on its Safety Management System (SMS), see above. However, no example of a lesson plan learned while tracking the effectiveness of its action found. This action should be the result of its due diligence process. No further evidence found. [2023 Improving Lives Report, 45377: aes.com] • Not Met: Involves stakeholders in evaluation effectiveness of actions: The 2023 Improving Lives Report indicates: 'The SMS [Safety Management System] establishes the expectation to involve employees in the development and review of policies and procedures to manage and reduce risks, consultations when there are changes that affect workplace health and safety and in representation on health and safety matters'. Regarding action plans to control and improve the performance in relation to safety of its contractors, it adds: 'Beyond additional

Indicator Code	Indicator name	Score (out of 2)	Explanation
			training, some actions might include: measurement of safety culture using perception safety surveys to identify behavioral improvement opportunities; improve effective monitoring and supervision of contractors and share lessons learned from incidents with the contractors in place'. The Human Rights Policy adds: 'Our businesses are committed to engaging with their people to continually improve health and safety in the workplace, including the identification of risk and hazards and the remediation of health and safety issues'. However, no description found of how it involves affected stakeholders in evaluation of whether the actions taken have been effective. [2023 Improving Lives Report, 45377: aes.com] & [Human Rights Policy, n/d: aes.com]
B.6	Communication on human rights impacts	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Provides one example of comms with stakeholders • Not Met: Describes challenges to effective comms and how it is working to address them

C. Remedies and grievance mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	2	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all workers: The Company has the AES Helpline where a suspected violation of the AES Values Guide (Code of Conduct) can be reported. It also has the Speaking Safely, in which workplace safety, security and environmental concerns can be reported. [Ethics compliance_web, n/d: aes.com] & [Speaking Safety, n/d: secure.ethicspoint.com] • Met: Grievance mechanism available in appropriate languages and workers made aware: The 2023 Improving Lives Report indicates: 'The AES Helpline is a publicly and permanently available global confidential channel in every AES language'. Also, 'We conduct regular training for our employees (both full and part-time) on a variety of related ethics and compliance topics and policies, including our Code of Conduct'. Information on the Helpline is included in the Code of Conduct. [2023 Improving Lives Report, 45377: aes.com] & [Code of Conduct, n/d: aes.com] • Met: Describes how workers in supply chain access grievance mechanism: The Supplier Code of Conduct indicates: 'Suppliers who are aware of a violation of this Code or who have a question should contact the AES Helpline [...]'. In future assessments the Company will be expected to demonstrate this applies to all business relationships. [Supplier Code of Conduct, n/d: aes.com] • Met: Expects business relationships to convey expectation to their business relationships: See above. The Supplier Code of Conduct indicates: 'The AES Supplier Code of Conduct is incorporated into our contracts with suppliers and our suppliers are responsible for ensuring the compliance of any subcontractors with our Supplier Code of Conduct'. [Supplier Code of Conduct, n/d: aes.com]
C.2	Grievance mechanism(s) for external individuals and communities	0.5	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all external individuals and communities: The webpage section AES Helpline indicates: 'Our global helpline serves as a confidential channel for asking questions and expressing concerns. The Helpline can be used by AES People or any of the Company's stakeholders'. The Human Rights Policy adds: 'The AES Helpline is a confidential resource for AES employees, contractors, business partners and others to ask questions or report concerns regarding AES' business conduct. The AES Helpline is available globally and 24-hours a day by phone or online and in languages spoken at all AES locations'. [Helpline_web, n/d: secure.ethicspoint.com] & [Human Rights Policy, n/d: aes.com] • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: See above. The AES Helpline is available in six languages and the Speaking Safely hotline in seven languages. The 2023 AES Andes Integrated Annual Report has information on training carried out with workers on the Helpline. AES Andes is one of the Company's subsidiaries. The 2023 Improving Lives Report provides information on the different channels workers can access. It adds: 'Our Global Stakeholder Engagement Playbook, available internally and applicable to all our operations and construction projects, was developed in line with the AA1000 Stakeholder Engagement Standard, and guides our country, local, and site-level engagement plans and system, including: [...] Implementing grievance mechanisms and communication channels'. Regarding its community relations, it explains: 'Often part of the permitting processes, we conduct Social Impact Assessments, which can include how the project could impact the local economy, social dynamics, and basic services. From there we can begin developing a community engagement strategy that includes, communication plans, a grievance mechanism, and a plan for meaningful consultations with both informal and formal meetings. Transparency and early disclosure are key and are followed by informal

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>and formal consultations phases to provide more detailed information about the project, impacts, benefits, and mitigation measures, among others and to provide communities with the opportunity to express their views on project risks and impacts so that AES can consider and respond to them'. [2023 AES Andes Integrated Report, 2023: aesandes.com] & [2023 Improving Lives Report, 45377: aes.com]</p> <ul style="list-style-type: none"> • Not Met: Describes how external individuals/communities access grievance mechanism: The 2023 Improving Lives Report indicates: 'Our safety program includes a culture in which all people are responsible, empowered, and able to speak freely, ask questions, voice concerns, and stop work as needed'. The webpage section Speaking Safety adds: 'If you have any reason to suspect that any AES business, person, or contractor has violated our Safety or Security Rules or Environmental Procedures, speak up. Discuss the issue with your supervisor/leader, or HR representative. If you do not feel comfortable speaking up, Speaking Safely offers an anonymous and secure communication channel for alerting those who will help ensure your and your co-workers' safety'. It also provides information on community relations and its Social Impact Assessments: 'From there we can begin developing a community engagement strategy that includes, communication plans, a grievance mechanism, and a plan for meaningful consultations with both informal and formal meetings'. It also has a tagline with a link to its Contact us webpage section which says: 'We want to hear from all of our stakeholders - questions, feedback and grievances'. As for the Ethics Point, its FAQs webpage section indicates: 'EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global that enables management and employees to work together to address fraud, abuse, and other misconduct in the workplace while cultivating a positive work environment'. The webpage section AES Helpline indicates: 'Our global helpline serves as a confidential channel for asking questions and expressing concerns. The Helpline can be used by AES People or any of the Company's stakeholders'. The Human Rights Policy adds: 'The AES Helpline is a confidential resource for AES employees, contractors, business partners and others to ask questions or report concerns regarding AES' business conduct'. However, it is not clear the Company's grievance mechanisms are open to external individuals and communities to raise concerns about business relationships. No further evidence found. [2023 Improving Lives Report, 45377: aes.com] & [Human Rights Policy, n/d: aes.com] • Not Met: Expects business relationships to convey expectation to their business relationships: See above. The Supplier Code of Conduct indicates: 'Suppliers who are aware of a violation of this Code or who have a question should contact the AES Helpline'. Moreover, 'The AES Supplier Code of Conduct is incorporated into our contracts with suppliers and our suppliers are responsible for ensuring the compliance of any subcontractors with our Supplier Code of Conduct'. However, it is not clear the mechanisms are open to external individuals and communities. [Supplier Code of Conduct, n/d: aes.com]
C.3	Remedying adverse impacts	0.6667	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes approach taken to remedy adverse HRs impacts: The 2023 Improving Lives Report indicates: 'Our target is to have zero fatalities. While we continue to maintain zero fatalities for our people since 2020, we regret the loss of a contractor in 2023. We conducted a root cause analysis to understand the circumstances that led to this tragic incident and took measures designed to prevent something like this from happening again. [...] In 2023, more than 21,000 AES people and contractors participated in monthly safety meetings open to all employees and contractors that cover key performance metrics, lessons learned, and relevant safety topics. Another 4,200 AES people participated in online safety training through our digital learning platform'. It further expands on its Safety Management System. However, this subindicator looks for evidence of cases where the company provides some form of remedy to people affected. [2023 Improving Lives Report, 45377: aes.com] • Met: Describes changes to systems, processes and practices to prevent future impacts: As seen above: 'Our target is to have zero fatalities. While we continue to maintain zero fatalities for our people since 2020, we regret the loss of a contractor in 2023. We conducted a root cause analysis to understand the circumstances that led to this tragic incident and took measures designed to prevent something like this from happening again. [...] In 2023, more than 21,000 AES people and contractors participated in monthly safety meetings open to all employees and contractors that cover key performance metrics, lessons learned, and relevant safety topics. Another 4,200 AES people participated in online safety training through our digital learning platform'. [2023 AES Andes Integrated Report, 2023: aesandes.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describes approach to monitoring/implementing agreed remedy: The 2023 Improving Lives Report indicates: 'The SMS establishes the expectation to involve employees in the development and review of policies and procedures to manage and reduce risks, consultations when there are changes that affect workplace health and safety and in representation on health and safety matters. Safety committees at our locations include representation from different levels of staff to discuss safety, foster a culture of safety, and drive performance improvements. The committees monitor the implementation of the SMS, including inspections, observations, audits, and improvement plans. As part of the SMS, our standardized tool enables the ability to conduct incident investigation root cause analysis to generate action plans and prevent recurrence. Compliance with the SMS and standards is monitored through internal and external audits. Internal audits are carried every six months and independent/external corporate audits are carried out every three years. A corrective action plan is developed for each audit finding, with the overall audit performance reported periodically to executive leadership'. However, although the Company describes some aspects of its safety management system, this indicator looks for a description its specific approach to follow up on remedies implemented, irrespective of the matter that has been needed to remedy. [2023 Improving Lives Report, 45377: aes.com]

2. Salient human rights risks (40% of total)

D. Indigenous Peoples' and Affected Communities' Rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.PD	Commitment to respect indigenous peoples' rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to respect indigenous peoples' rights with explicit reference to UN Declaration: The 2023 Improving Lives Report indicates: 'Prior to the approval and construction, we conduct an assessment to understand the demographics, culture, history, economy, and other key characteristics of the area of influence, which may progress into a more comprehensive Social Baseline Assessment if need be. We also identify the presence of Indigenous Peoples'. However, no public commitment found to respect Indigenous Peoples' rights in line with international law and standards, explicitly referencing the UN Declaration on the Rights of Indigenous Peoples, through its own operations and value chain. [2023 Improving Lives Report, 45377: aes.com] • Not Met: Description of process for identifying indigenous persons and customary lands.: The 2023 Improving Lives Report indicates: 'We also identify the presence of Indigenous Peoples'. However, no description found of its process for identifying Indigenous Peoples, and their lands, territories and resources they have a right to, including customary, traditional, or lands, territories, and resources they have otherwise used or acquired. [2023 Improving Lives Report, 45377: aes.com] & [Kūihelani Solar Phase 2_web, n/d: aes-hawaii.com] • Not Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources • Not Met: Commitment to FPIC: The 2023 Improving Lives Report indicates: 'Prior to the approval and construction, we conduct an assessment to understand the demographics, culture, history, economy, and other key characteristics of the area of influence, which may progress into a more comprehensive Social Baseline Assessment if need be. We also identify the presence of Indigenous Peoples'. However, no explicit commitment to free prior and informed consent (FPIC) was found, in line with international human rights law, including the right of Indigenous Peoples to define the process by which FPIC is achieved and to withhold consent, regardless of an opposing claim by the government. [2023 Improving Lives Report, 45377: aes.com]
D.2.PD	Engagement with all affected communities	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Describes how local communities identified and engaged in the last two years: The 2023 Improving Lives Report indicates: 'We tailor our Stakeholder Engagement approach to local stakeholders throughout the lifecycle of the projects. Prior to the approval and construction, we conduct an assessment to understand the demographics, culture, history, economy, and other key characteristics of the area of influence, which may progress into a more comprehensive Social Baseline Assessment if need be. We also identify the presence of Indigenous Peoples. Often part of the permitting processes, we conduct Social Impact Assessments, which can include how the project could impact the local economy, social dynamics, and basic services. From there we can begin developing a community engagement strategy that includes, communication plans, a grievance mechanism, and a plan for meaningful consultations with both informal and formal meetings. Transparency and early disclosure are key and are

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>followed by informal and formal consultations phases to provide more detailed information about the project, impacts, benefits, and mitigation measures, among others and to provide communities with the opportunity to express their views on project risks and impacts so that AES can consider and respond to them. During the construction phase we maintain dialogue with communities and local authorities with special focus to communicate works, possible impacts and also to start developing social impact programs. We often create project websites to share visual models, explain impacts, and encourage questions and comments. During operations and throughout the lifetime of the project, we continue to engage all relevant stakeholders, and work together on community impact programs, aligned with local community needs'. The webpage section for the West Camp Wind Farm notes that there was a Navajo County Public Meeting and a Planning & Zoning Public Hearing in the Navajo County Governmental Complex, in 2022 (Within last two reporting years at the time of the research) [2023 Improving Lives Report, 45377: aes.com] & [West Camp Wind Farm_web, n/d: aes.com]</p> <ul style="list-style-type: none"> • Not Met: Provides two examples of engagement with communities: The Andes 2023 Integrated Report discloses information on projects in which the Early Citizen Participation (PACA), Citizen Participation (PAC, for its acronym in Spanish), and Indigenous Consultation (PCI, for its acronym in Spanish) processes were used throughout 2023. It includes 'Three community meetings held in the rural communities of Pantanillos, Quiebrafrenos and Los Troncos' with 60 participants and 'Two citizen dialogues were held: one at the headquarters of the Peine Neighborhood Association, town of Peine, and another one in the auditorium of the Santo Tomás University of Antofagasta', both PAC 2023 Activities. There was also 'A meeting was held on March 28, 2023 with the Changa indigenous communities El Salitre, El Gaucho, Finao Loreto, La Playita, Pabla Almendares, and Cachinales'. The Community Outreach Plan for the project Kūihelani Solar Phase 2 explains: 'Early outreach for the Project included consultation on cultural matters. AES Hawai'i retained Cultural Surveys Hawaii (CSH) to conduct a Cultural Impact Assessment (CIA) to introduce the Project and obtain feedback on any potential effects the Project may have on area cultural practices. In April and May 2024, CSH contacted Native Hawaiian organizations, area cultural practitioners, kupuna and others via email and letters to understand any potential effects the Project may have on cultural practices'. Similarly, the Community Outreach Plan for the project Ke'āmuku Solar + Storage indicates: 'In April and May 2024, CSH contacted Native Hawaiian organizations, area cultural practitioners, kupuna and others via email and letters to understand any potential effects the Project may have on local cultural practices. The Company has provided additional comments regarding these two projects. However, its content has not been found in publicly available sources. Additional information was provided but it was more than tow years old. It is not clear whether these engagements were in the context of human rights or include issues related to these topics beyond cultural practices. No further description found of these engagements. [2023 AES Andes Integrated Report, 2023: aesandes.com] & [Community Outreach Plan for the Ke'āmuku Solar + Storage, 45638: aes-hawaii.com] • Met: Examples of engagement refer to marginalised groups and provide additional detail: The Community Outreach Plan for the Ke'āmuku Solar + Storage project indicates: 'In April and May 2024, CSH [Cultural Surveys Hawaii] contacted Native Hawaiian organizations, area cultural practitioners, kupuna and others via email and letters to understand any potential effects the Project may have on local cultural practices'. The webpage section of the project adds: 'we have done for all Hawai'i projects previously developed or currently in development, this project will undergo extensive Archaeological and Cultural reviews to gain a comprehensive understanding of the land and any potential impacts resulting from the proposed development. To the extent practicable, all steps will be taken to carefully record, avoid, and/or mitigate impacts to archaeological and cultural resources. Past practices that may be utilized for this project include, but are not limited to: hiring local on-island firms to perform an Archaeological Inventory Survey Report (AIS), Ka Pa'akai Analysis, Cultural Literature Review, Archaeological Literature Review and Field Inspection Report and Cultural Impact Assessment (CIA). These initiatives will often include interviews and consultation with lineal and cultural descendants, kupuna, Native Hawaiian Organizations (NHOs), agencies and area cultural leaders, and presentations to interested groups and parties. [...] AES Hawai'i is committed to conducting a Ka Pa'akai Analysis. In addition, AES Hawai'i will consult with SHPD [State Historic Preservation Division] to determine whether a CIA is warranted based on the results of the CLR and Ka Pa'akai Analysis'. It carries out similar practices with the Kūihelani Solar Phase 2 project. See above details of stakeholder engagement approach for identification. [Ke'āmuku Solar + Storage_web, n/d: aes-

Indicator Code	Indicator name	Score (out of 2)	Explanation
			hawaii.com] & [Community Outreach Plan for the Ke’āmuku Solar + Storage, 45638: aes-hawaii.com] <ul style="list-style-type: none"> • Not Met: The company meets B2.C, B3.D, B4.D and B.5.C
D.3.PD	Benefit and ownership sharing policy	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to identify benefit and ownership sharing: The 2024 Proxy Statement indicates: ‘AES businesses directly engage with local communities and support programs that aim to make communities stronger economically, socially [...]. Working together with our partners and various stakeholders, we tailor our impact programs to respond to the needs and resources of our communities, and deliver long-lasting benefits. Strong partnerships allow us to work together to develop positive impact programs, [...] and create long-term benefits within communities. Partners include government agencies, development agencies, municipalities, non-governmental organizations, customers, universities and technical institutions, business partners, and subcontractors’. However, no policy commitment found to identify potential benefit and ownership sharing options that serve affected communities and Indigenous Peoples. [2024 Proxy Statement, 2025: d18rn0p25nwr6d.cloudfront.net] • Not Met: Commitment includes right to decide own priorities for communities • Not Met: Disclosure of statistics for each project describing demographics of benefit/ownership sharing • Not Met: Disclosure how affected communities participated in decision-making
D.4.PD	Local wind & solar energy access, affordability	1.3333	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Actions taken to support access and affordability of renewable energy in the value chain: The webpage section Energía rural indicates: ‘Since 2001, through AES Rural Energy, we have contributed to reduce the number of households without electricity. [...] Between 2009 and 2012, we established an alliance with Fomilenio that enabled the construction of 1,110 electrification projects. In 2016, we developed our first Solar Rural Energy pilot plan to provide households in remote zones access to electrical energy. This innovative project provided electrical energy from highly reliable solar energy sources, benefiting 14 families in the Los Encuentros settlement within the municipality of San Francisco Menéndez. In 2019, we started an initiative to support families in poverty by providing free installation of the electrical service and a basic system that included a breaker box, an outlet and an energy-saving lightbulb. In parallel with these initiatives, we give talks to rural communities on the safe use and efficient consumption of electricity. To date, more than 60,000 people from 1,047 rural communities throughout the country have benefited from these talks. [...] In parallel, we give talks to rural communities on the safe use and efficient consumption of electricity. To date, more than 60,000 persons from 1,047 rural communities throughout the country have benefited from these talks’. [Energía rural_web, n/d: aes.com] • Met: Public support for government policies addressing energy access: It has issued a letter to the House Public Utilities Committee on the Bill 79, where it indicates: ‘AES Ohio supports energy efficiency programs. The state’s electric distribution utilities are uniquely positioned to deliver cost-effective programs to customers at scale and to work with local stakeholders, including contractors, distributors, and trade groups to achieve the benefits of these programs. [...] HB 79 would allow an electric distribution utility to apply to the Public Utilities Commission of Ohio for approval of a portfolio of programs for energy efficiency and peak demand reduction. The bill describes available programs, including: Limited behavioral energy savings. At least one low-income program, Smart technology measures, and Energy savings from installed devices at the request of the customer. Although previous Ohio energy efficiency programs relied on mandates to meet savings goals, HB 79 incentivizes both customers and utilities to be more efficient’. The 2022 AES Indiana Integrated Resource Plan indicates: ‘The Preferred Resource Portfolio and Short Tern Action Plan will provide AES Indiana customers: Affordability, Saves AES Indiana customers more than \$240 million over the 20-year planning horizon. Provides the least cost to customers over the 20-year planning horizon through the economic conversion of the remaining Petersburg units from coal to natural gas. Demonstrates lowest annual Present Value Revenue Requirement (“PVRR”) relative to other portfolios over the 20-year planning horizon. [...] Per IURC [Indiana Utility Regulatory Commission] Rules (170 IAC § 4-7-9(a)), AES Indiana’s Short Term Action Plan covers the next three years, 2023 through 2025, in this IRP. However, given the challenges and delays with procuring replacement capacity in the current and foreseeable market, the Company intends to pursue projects that the EnCompass Model has selected through 2027. This effort will be taken to sufficiently fill capacity requirements under the new MISO seasonal resource adequacy construct.’. The Company has signed an open letter from the Global Renewable Alliance calling for a target at COP28 to triple

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>renewable energy capacity to at least 11,000GW by 2030: ‘We underscore that a step change this decade in renewable energy growth, combined with an increase in energy efficiency, will be the fastest and most cost efficient way to decarbonise the global economy. It is one of the most impactful commitments that the global community can undertake now to secure a liveable future for all. [...] Strengthen commitment to Sustainable Development Goal 7 to achieve a just and orderly energy transition that leaves no one behind, with continued action towards providing affordable, reliable, sustainable and modern energy for all by 2030’.</p> <p>[Proponent Testimony on House Bill 79, 26/04/2023: content.influencemap.org] & [2022 Indiana Integrated Resource Plan, 2022: aesindiana.com]</p> <ul style="list-style-type: none"> • Not Met: Including a timebound actions plan and reporting targets

E. Land and resource rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
E.1.PD	Respect for land and natural resource tenure rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Policy commitment to respect land ownership/natural resources: The Company has provided comments regarding this indicator. However, its content has not been found in publicly available sources. • Not Met: Identification of legitimate tenure rights holders • Not Met: Extends expectation to business relationships: The Company provides information on locations of its renewable projects, in its 2024 Fact Sheet FINAL. Similar information is found in the 2023 AES Andes Integrated Annual Report. It also discloses various EIAs and two sustainability reports in Spanish, only documents in English accepted when considering Company-wide requirements. No evidence found that it expects all relevant parts of its value chain to respecting land rights of legitimate tenure rights holders and to disclose how it identifies legitimate tenure rights holders, with particular attention to vulnerable tenure rights holders. [2024 Fact Sheet, 45596: aes.com] & [2023 AES Andes Integrated Report, 2023: aesandes.com] • Not Met: Steps taken to use leverage to resolve land rights issues or disclosure that no such issues arose
E.2.PD	Just and fair physical and economic displacement policy implementation including free, prior and informed consent	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to follow IFC PS 5 for physical and economic displacements: The Human Rights Policy indicates that: ‘When resettlement is unavoidable, our businesses are encouraged to work collaboratively and transparently with local communities and to consider external guidelines such as the International Finance Corporation’s Performance Standards on Environmental and Social Sustainability, when relevant’. However, to ‘consider external guidelines’ is not considered a commitment to follow IFC Performance Standard 5. The Company has provided comments regarding this indicator. However, its content has not been found in publicly available sources. [Human Rights Policy, n/d: aes.com] • Not Met: Description of compensation for resettlement: The Human Rights Policy indicates that: ‘AES’ Human Rights Policy encourages our businesses to avoid relocation or resettlement whenever possible. When resettlement is unavoidable, our businesses are encouraged to work collaboratively and transparently with local communities and to consider external guidelines such as the International Finance Corporation’s Performance Standards on Environmental and Social Sustainability, when relevant’. However, no commits found to not relocate or displace affected communities without providing just and fair compensation, as agreed during the resettlement process with affected rightsholders. ‘Encourage’ is not considered as a commitment. The Company has provided comments regarding this indicator. However, its content has not been found in publicly available sources. [Human Rights Policy, n/d: aes.com] • Not Met: Publishes statistics on numbers affected by relocations (current and planned projects): The Company has provided comments regarding this indicator. However, its content has not been found in publicly available sources. • Not Met: Publishes regular reviews of living conditions after relocation OR description of approach to physical and economic displacement: The Company has provided comments regarding this indicator. However, its content has not been found in publicly available sources.

F. Security and conflict-affected areas

Indicator Code	Indicator name	Score (out of 2)	Explanation
F.1.PD	Operating in or sourcing from conflict-affected areas	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to heightened HRDD in conflict affected areas: The Supplier Code of Conduct states: 'Suppliers shall take reasonable efforts to avoid in their products the use of raw materials which directly or indirectly finance armed groups who violate human rights'. However, this datapoint looks for references to the Company's own operations when operations in or sourcing from conflict-affected and/or high-risk area rather than a supplier's policy. The Fluence Responsible Sourcing Policy indicates: 'Fluence is committed to working toward avoiding the use, within our supply chain, of minerals from conflict-affected and high-risk areas which are affected by the risks defined in Annex 2 of the OECD Due Diligence Guidance'. However, no company-wide commitment found to address the heightened human rights risks associated with operations in or sourcing from conflict-affected and/or high-risk areas. In addition, Fluence is not a Company's subsidiary, but a publicly traded company in which AES holds a significant minority stake. [Fluence Responsible Sourcing Policy, 45323: info.fluenceenergy.com] & [Supplier Code of Conduct, n/d: aes.com] • Not Met: Steps taken to assess and mitigate these risks with conflict sensitive lens • Not Met: How stakeholders are involved in the process to mitigate risks
F.2.PD	Evidence of security provider human rights assessments	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Description of implementation of security approach and example: The Human Rights Policy indicates: 'Our businesses should expect their suppliers to treat their employees well and to interact with communities in ways that respect human rights and adhere to all local laws [...]. We and our businesses hold our business partners and contractors to high ethical standards and expect them to adhere to AES' Code of Conduct. Each partner undergoes a thorough due diligence process, and compliance language is included in appropriate contracts, where appropriate, to ensure compliance with such standards'. Only guidelines on cybersecurity were found in the Code of Conduct. The 2023 AES Andes Integrated Report explains about the AES Colombia's Human Rights Management System and expands on its Workshop 'Risks and Actions in Response to Potential Human Rights Violations'. However, no description found of how it implements its security approach. Moreover, the Company is expected to provide an example of how it ensures respect for human rights in the course of maintaining the security of Company managed operations, including when working with contracted private or public security providers, if applicable. [Human Rights Policy, n/d: aes.com] & [2023 AES Andes Integrated Report, 2023: aesandes.com] • Not Met: Description of monitoring of business partners • Not Met: Local communities engaged in assessment of security • Not Met: Example of working with community on this issue

G. Responsible mineral sourcing

Indicator Code	Indicator name	Score (out of 2)	Explanation
G.1.PD	Responsible sourcing of minerals: arrangements with suppliers	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Statement on OECD Guidance aligned due diligence: The Company has a participation in Fluence. It has a Responsible Sourcing Policy. However, no company-wide responsible sourcing policy statement committing it to follow the OECD Guidance found. [Fluence Responsible Sourcing Policy, 45323: info.fluenceenergy.com] • Not Met: The policy explicitly covers all minerals • Not Met: Policy expectations of suppliers • Not Met: Contractual requirement for smelters/refiners to follow OECD
G.2.PD	Responsible sourcing of minerals: mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Identification and mapping of suppliers • Not Met: Traceability system for mineral supply chain: The Company has a participation in Fluence. It has a Conflict Minerals Policy which indicates: 'Our engagement of suppliers includes the following: [...] We support initiatives to verify smelters and refiners that are conflict-free, and expect our suppliers to utilize any such conflict-free smelter/refiner programs that are available'. However, no evidence found of a company-wide supplier expectation (at minimum wind turbine and solar panel suppliers) to publicly disclose the list of all the qualified smelters/refiners that the supplier has independently judged to conform to the due diligence processes set out in the OECD Guidance. [Fluence Conflict Minerals Policy, n/d: info.fluenceenergy.com] • Not Met: Discloses smelters/refiners that are most significant part of supply chain • Not Met: Suppliers in higher risk activities, geographies, products

Indicator Code	Indicator name	Score (out of 2)	Explanation
G.3.PD	Responsible sourcing of minerals: risk identification in mineral supply chains	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Identification and prioritising of risks in supply chain: The webpage section Contractors & Suppliers indicates: 'We evaluate new and existing suppliers using a diverse set of tools depending on the complexity or criticality of the transaction. One tool we use is STACE (Safety and Sustainability, Technical, Alignment, Cost, Execution), a scorecard that enables our people to evaluate supplier proposals and performance in a fair and consistent manner. The pre-qualification supplier process includes financial and ESG factors and compliance with laws. Existing suppliers are evaluated and audited for their environmental, safety, and labor practices. Sustainability criteria included in the evaluation process are tailored to the specific location of the work, materials, and/or services provided. These can include environmental and safety metrics and performance, commitment to comply with all applicable labor regulations [...], and other criteria'. However, no description found of its processes for identifying and prioritising risks and impacts in its mineral supply chain, as set out in the OECD Guidance and discloses the risks identified. [Contractors & suppliers_ web, n/d: aes.com] • Not Met: Expectation on suppliers to disclose • Not Met: Processes cover minerals assessed as highest risk

H. Protection of human rights and environmental defenders

Indicator Code	Indicator name	Score (out of 2)	Explanation
H.1.PD	Commitment to respect the rights of human rights and environmental defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Zero tolerance of threats/attacks on HRDs • Not Met: Expectation on business partners in value chain to make this commitment • Not Met: Description of how working with HRDs as part of risk assessment and DD • Not Met: Description of how working with HRDs to create safe and enabling environment

I. Labour rights (incl. protection against forced labour)

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.1.PD	Health and safety	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: The Company describes the process(es) it has in place to identify its health and safety risks and impacts: The webpage section Keeping our people safe indicates: 'Our Safety Management System (SMS) is built on the OHSAS 18001 Occupational Health and Safety Management System model. [...] Our SMS requires each business to: Establish and maintain procedures for the identification and reduction of health and safety risks'. The 2024 Proxy Statement adds: 'The SMS requires continuous safety performance monitoring, risk assessment, and performance of periodic integrated environmental, health, and safety audits. The SMS provides a consistent framework for all AES operational businesses and construction projects to set expectations for risk identification and reduction, measure performance, and drive continuous improvements'. Finally, the 2023 Improving Lives Report notes: 'Each operation should establish and maintain a planning process to identify hazards, evaluate risks and implement effective mitigation control measures following the hierarchy of controls (elimination-substitution-engineering-administrative-personal protection equipment). The safety risk assessment process should also be performed prior to starting any activity in the construction of new projects and/or during the due diligence process for new operations. [...] As part of the SMS, our standardized tool enables the ability to conduct incident investigation root cause analysis to generate action plans and prevent recurrence'. [2023 ESG Indicators, 2024: aes.com] • Met: Discloses quantitative information on H&S in own operations (injury rate or lost days and fatalities) in last reporting period: The document 2023 ESG Indicators discloses figures for AES people related to fatalities in 2023: 0; and to Lost time incident (LTI) rate, also in 2023: 0,117. [2023 ESG Indicators, 2024: aes.com] • Not Met: Expects disclosure of H&S information of relevant business relationships: The document 2023 ESG Indicators discloses figures for all contractors related to fatalities in 2023: 1; and to Lost time incident (LTI) rate, also in 2023: 0,098. The Contractor Prequalification Questionnaire found in the Contractor Safety Management Standard, part of its AES Global Safety Standard, indicates: 'This questionnaire must be completed in its entirety and accompanied with all requested attachments for AES review, prior to any opportunity to contract work with AES. Note: Omitting information or reporting false information on this questionnaire could result in the disqualification or removal from AES's list of qualified contractors. AES reserves the right to conduct random or for-cause audits of the information stated in this questionnaire'. The questionnaire includes

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>questions on safety history of the previous three (3) calendar years: Number of accidents requiring medical attention, number of lost time accidents, total number of days off work due to accidents, number of fatalities, Workers Compensation Board (WCB) Performance rating or equivalent (Cost and accident frequency report), number of regular and overtime hours worked. The scope of the Contractor Safety Management Standard 'applies to all AES Businesses and it describes the safety management requirements from the requisition of contracted work through to the contract closure and contractor evaluation. All elements of this standard must be implemented for any work that exposes contractor(s) to safety hazards which, should an incident occur, may result in a fatality or disability, either permanent or temporary'. The 2023 Improving Lives Report indicates: 'Our commitment to safety carries over to all AES employees, including contractors. We publish our expectations to prospective suppliers, including our Contractor Safety Management Standard which specifies the safety management requirements for the entire contracting cycle: from the requisition of work to the contract closure, including a site safety specific plan. [...] We measure the safety performance of our contractors using the same metrics we use for our people. The performance is evaluated on a monthly basis [...]'. However, it is not clear also applies to Contractor Safety Management Standard to supply chain, beyond contractors (that work in the companies' sites). [Supplier Code of Conduct, n/d: aes.com] & [Contractor Safety Management Standard, 25/07/2015: aes.com]</p> <ul style="list-style-type: none"> • Met: Targets for H&S performance (including injury rates or lost days and fatalities): The 2023 Improving Lives Report indicates: 'Our target is to have zero fatalities. While we continue to maintain zero fatalities for our people since 2020, we regret the loss of a contractor in 2023. We conducted a root cause analysis to understand the circumstances that led to this tragic incident and took measures designed to prevent something like this from happening again'. As for lost time incident (LTI) rates, it notes: 'we aim to be below the US utility industry's top quartile benchmark LTI rates (0.21) and we continued to exceed the benchmark during 2023'. It adds: 'In 2023, more than 21,000 AES people and contractors participated in monthly safety meetings open to all employees and contractors that cover key performance metrics, lessons learned, and relevant safety topics. Another 4,200 AES people participated in online safety training through our digital learning platform. [...] Safety committees at our locations include representation from different levels of staff to discuss safety, foster a culture of safety, and drive performance improvements. The committees monitor the implementation of the SMS, including inspections, observations, audits, and improvement plans'. [2023 Improving Lives Report, 45377: aes.com]
I.2.PD	Forced labour risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Board level oversight over policies on forced labour in supply chain. How relevant stakeholders informed board discussions: The Governance Committee Charter states: 'The [Governance] Committee shall be responsible for the periodic review and oversight of the Company's programs, policies, and practices designed to achieve its goal to act in a socially responsible way related to business conduct, public policy, human rights, [...]. The Committee shall also be responsible for the periodic review and oversight of the risks related to such social responsibility matters'. However, it is not clear it includes oversight of its supply chain policies that address forced labour. Moreover, the Company is expected to describe how the experiences of affected workers, rightsholders or relevant stakeholders (such as civil society, unions, and workers or their representatives) informed Board discussions. No further evidence found. [Governance Committee Charter, 45200: aes.com] • Not Met: Capacity building with suppliers: The 2023 AES Andes Integrated Report explains its Phase III of the Human Rights Program for Suppliers and Contractors: 'Building on the human rights program for suppliers and recurring contractors launched in 2021, the Third Phase of the initiative was rolled out in the latter half of 2023, involving 19 companies. The project concentrated on four key areas: [...] (ii) forced labor; [...]. To address these, four virtual sessions, each lasting one hour, were conducted'. It adds information about a Workshop on "Risks and Actions in Response to Potential Human Rights Violations" for employees and suppliers, including 13 sessions with 255 people, including representatives from 67 companies, 60 employees of the three security companies that provide services to AES'. AES Andes is one of the Company's subsidiaries. However, although it offered training to some of its suppliers on the topic of forced labour, it is not clear the Company engages in capacity building to enable its suppliers to cascade its supply chain policies that address forced labour to their own supply chains. Alternatively, the Company could provide evidence it trains suppliers below the first tier on such

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>policies, and measures the effectiveness of capacity building. No further evidence found. [2023 AES Andes Integrated Report, 2023: aesandes.com]</p> <ul style="list-style-type: none"> • Not Met: Discloses ongoing efforts to prevent and mitigate forced labour in own ops and supply chain: As indicated above, the 2023 AES Andes Integrated Report explains its Phase III of the Human Rights Program for Suppliers and Contractors: 'Building on the human rights program for suppliers and recurring contractors launched in 2021, the Third Phase of the initiative was rolled out in the latter half of 2023, involving 19 companies. The project concentrated on four key areas: [...] (ii) forced labor [...]. To address these, four virtual sessions, each lasting one hour, were conducted'. It adds information about a Workshop on "Risks and Actions in Response to Potential Human Rights Violations" for employees and suppliers, including 13 sessions with 255 people, including representatives from 67 companies, 60 employees of the three security companies that provide services to AES'. AES Andes is one of the Company's subsidiaries. However, no evidence found of an ongoing effort to prevent and mitigate forced labour in its operations, for instance through capacity building and/or collaboration with others. [2023 AES Andes Integrated Report, 2023: aesandes.com] • Not Met: Factors to be considered when ending a business relationship incl. responsible disengagement: The webpage section Contractors & suppliers indicates: 'Existing suppliers are evaluated and audited for their environmental, safety, and labor practices. Sustainability criteria included in the evaluation process are tailored to the specific location of the work, materials, and/or services provided. These can include environmental and safety metrics and performance, commitment to comply with all applicable labor regulations (such as child or forced labor, working hours, etc.), and other criteria'. The 2023 Improving Lives Report notes: 'We take failure to comply with our Supplier Code of Conduct seriously and, in addition to any other remedy available to AES, may result in immediate termination of a supplier's contract with AES and/or exclusion from future business opportunities'. The Supplier Code of Conduct indicates: 'Suppliers shall comply with all applicable child and forced labor'. It indicates that 'Suppliers must comply with all applicable laws and the standards set forth in this Code'. However, no further explanation found on the factors it would consider when deciding whether to end the business relationship if it is not able to adequately use leverage to prevent or mitigate adverse impacts, in the context of forced labour risk management (i.e. relevancy of the supplier, responsible exit). . No further information found. [Contractors & suppliers_ web, n/d: aes.com] & [Supplier Code of Conduct, n/d: aes.com]
I.3.PD	Prohibition of forced labour: Wage practices	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Requirements on paying in full and on time in supplier codes and contracts • Not Met: Describes work with suppliers on paying workers regularly, in full and on time • Not Met: Assessment scope of failure to pay workers in full and on time in supply chain • Not Met: Employer Pays Principle in policy for own ops and supply chain
I.4.PD	Prohibition of forced labour: Restrictions on workers	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Requirements on free movement in supplier codes and contracts and own operations • Not Met: Describes working with suppliers on free movement of workers • Not Met: Description of implementation and monitoring of this practice
I.5.PD	Freedom of association and collective bargaining	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment on FoA/CB and requirements in suppliers codes and contracts: The Human Rights Policy indicates that: 'Our businesses are present in a variety of countries and markets and we expect them to respect the rights of their people in accordance with local labor regulations, including laws relating to the freedom of association and collective bargaining'. The 2023 Improving Lives Report notes: 'AES maintains many global relationships with labor unions and where we have unionized workforces, we work diligently to participate in effective collective bargaining efforts. As of the end of 2023, ~73 percent of our people that were eligible, were covered by collective bargaining agreements'. The Supplier Code of Conduct adds: 'Unless prohibited by local law, Suppliers shall grant their employees freedom of association and collective bargaining'. However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'people in accordance with local labor regulations' and 'Unless prohibited by local law'. In these cases (companies referring to local laws in freedom of association and collective bargaining), Companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. Moreover, no evidence found of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>measures to prohibit any form of intimidation, harassment, retaliation or violence against workers seeking to exercise the right to form and join a trade union of their choice (or equivalent worker bodies where the rights to freedom of association and collective bargaining are restricted under law). [Human Rights Policy, n/d: aes.com] & [2023 Improving Lives Report, 45377: aes.com]</p> <ul style="list-style-type: none"> • Not Met: Describes work with suppliers on FoA/CB: See above. The 2023 Improving Lives Report indicates: 'As of the end of 2023, ~73 percent of our people that were eligible, were covered by collective bargaining agreements'. It is not the total proportion that is covered as according to some local laws, some workers may not be considered eligible. [2023 Improving Lives Report, 45377: aes.com] • Not Met: Assessment of scope of restriction of FoA/CB in supply chain • Not Met: Global Framework Agreement
I.6.PD	Living wage (in supply chains)	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Requirements on living wage in supplier codes and contracts: The Supplier Code of Conduct indicates: 'Suppliers shall comply with all applicable [...] working conditions laws (including working hours, wages, etc.)'. However, no requirement found to pay workers a living wage in its contractual arrangements. A living wage should cover basic needs and provide some discretionary for employees and his/her family and or depends. [Supplier Code of Conduct, n/d: aes.com] • Not Met: Describes work with suppliers on living wage • Not Met: Description of process to determine living wages with unions

J. Right to a healthy and clean environment

Indicator Code	Indicator name	Score (out of 2)	Explanation
J.1.PD	Environmental impact assessment and remediation	1.3333	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Conducts EIA for renewable energy projects: The Company undertakes environmental impact assessments for its renewable energy projects and has them published online. [2023 ESG Indicators, 2024: aes.com] & [EIA_Mesamávida_web, n/d: seia.sea.gob.cl] • Met: Publishes EIA for renewable energy projects: As indicated above, the environmental impact assessments are published online. [2023 ESG Indicators, 2024: aes.com] & [EIA_Mesamávida_web, n/d: seia.sea.gob.cl] • Not Met: Explains when CIA is conducted
J.2.PD	Life cycle assessment	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Expectation for suppliers to conduct regular public life cycle assessments • Not Met: Requires suppliers to have action plans to address adverse impacts identified

K. Transparency and anti-corruption

Indicator Code	Indicator name	Score (out of 2)	Explanation
K.1.PD	Anti-corruption due diligence and reporting	1.3333	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Commitment to prohibiting bribes to public officials: The Anti-Corruption Policy indicates: 'AES strictly prohibits the Company, its officers, directors, employees and third party agents from giving, offering, promising, or authorizing the giving of anything of value to a government official with the intent to improperly influence any official act or decision in order to obtain or retain business or secure an unfair business advantage for AES'. As for the private section, it notes: 'AES prohibits the Company, its officers, directors, employees and third party agents from giving, offering, promising, or authorizing the giving of anything of value [...] to a commercial party or other private person with the intention of inducing that person to breach an expectation that the person will act in good faith, impartially, or in accordance with a position of trust (such as in awarding or retaining a contract, providing favorable terms in a transaction, disclosing confidential or proprietary information, or providing other business advantages) in any way connected with AES business'. [Anti-Corruption Policy, 42027: aes.com] • Met: Expectation extends to relevant business relationships: The Supplier Code of Conduct indicates: 'Suppliers [include suppliers, contractors, consultants and third-party intermediaries] shall comply with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act, the OECD Convention Against Bribery, the UK Bribery Act, and any other applicable local anti-corruption laws. Suppliers may not directly or indirectly offer, promise or authorize the giving of anything of value to any government official, employee of a government-controlled company or political party, in order to obtain any improper benefit or advantage or for an improper reason. AES does not permit facilitation payments, regardless of local custom or practice'. [Supplier Code of Conduct, n/d: aes.com] • Not Met: Reports on any complaints on corruption and bribery: The Company reports on the type of reports received via AES Helpline, in 2023, including

Indicator Code	Indicator name	Score (out of 2)	Explanation
			allegations of suspected wrongdoing. However, no information found on reports information regarding any corruption or bribery complaints or concerns. The 2023 Improving Lives Report indicates: 'We had zero corruption breaches in 2023 and none of our people was disciplined or dismissed due to non-compliance with anti-corruption policy/policies'. However, although the Company discloses data on corruption breaches, no information found on the data regarding corruption or bribery complaints or concerns received via its grievance mechanism. [2023 ESG Indicators, 2024: aes.com] & [2023 Improving Lives Report, 45377: aes.com]
K.2.PD	Payments to governments & contract transparency	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Publishing a tax CbCR in line with GRI 207-4: The Company discloses information on tax for Panama in 2023 and; Colombia, Chile, Argentina in 2023 and 2024 and income tax for the USA in 2023. The data is found in different documents. However, it does not seem to publish a Country-by-country tax report in line with GRI Standard 207-4. At its feedback stage, the Company made reference to a document in Spanish, however, with specific exceptions, only documents written in English are accepted [Panama Combined 3Q, 45559: s28.q4cdn.com] & [2023 AES Andes Integrated Report, 2023: aesandes.com] • Not Met: Disclosure of terms, contracts, agreements for those payments • Not Met: Supports governments to disclose contracts and licenses on renewable energy project in line with EITI • Not Met: Disclosure of payments for land purchase made to governments at project-level

L. Diversity, equality and inclusion

Indicator Code	Indicator name	Score (out of 2)	Explanation
L.1.PD	Diversity, equality & inclusion training for management and employees	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Provides mandatory and regular training as per ILO No 190: The 2023 Improving Lives Report indicates: 'Between the end of 2023 and early 2024, more than 3,000 people participated in the training about Preventing Harassment and Discrimination including more than 300 leaders'. Regarding its Anti-Harassment and Discrimination Policy, it adds: 'This policy is introduced as part of the new employee onboarding, and digital courses are required to be completed on Managing Bias, Compliance and AES Code of Conduct, and on Harassment and Discrimination Prevention'. The Anti-Harassment Policy and Discrimination contains guideline on harassment and discrimination. The webpage section Ethics & Compliance notes: 'We conduct regular training to all our employees (both full and part-time) on a variety of related ethics and compliance topics and policies, including our [...] and workplace harassment, among others'. It is not clear the course provided is mandatory and regular or that it deals with equality, equity, diversity as well as discrimination, or that it follows the ILO Convention 190. [2023 Improving Lives Report, 45377: aes.com] & [Ethics compliance_web, n/d: aes.com] • Not Met: Requires suppliers to provide training • Not Met: Provides materials and access to resources for trainings • Not Met: The trainings include gender-based violence and the Company's policies and mechanisms for addressing it: The Anti-Harassment Policy and Discrimination indicates: 'Harassment can range from extreme forms such as violence, threats, or physical touching to less obvious actions like ridiculing, teasing, or repeatedly bothering colleagues'. It adds harassment may include; verbal, physical, visual, and online. However, no evidence found of trainings that include gender-based violence and the Company's policies and mechanisms for addressing it. [Anti-Harassment and Discrimination Policy, 01/11/2023: aes.com]
L.2.PD	Gender balance and sensitivity	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Timebound action plan to integrate gender lens to all relevant documents including on value chain • Not Met: Demonstrates progress through annual reporting: The Company reports on: the number and proportion of employees by gender; the percentage of women in management positions making the distinction between junior management positions, top management positions, all management positions, women in management positions in revenue-generating functions, and women in STEM-related positions; the total number of employees per employee category, age and gender. Each of these indicators have data reported from the year 2020 to the year 2023. However, although the Company provides collects and discloses data on different gender issues, no data found of how it progresses in integrating a gender lens to human rights policies and practices including its human rights due diligence process, risk management and remedy. [2023 ESG Indicators, 2024: aes.com] • Not Met: Women and non-binary people make up at least 40% of the Company's executives: As indicated above, it discloses 2023 data on percentage of women in junior management positions (17%), top management positions (21%), all

Indicator Code	Indicator name	Score (out of 2)	Explanation
			management positions (22%), women in management positions in revenue-generating functions (24%), and women in STEM-related positions (20%). No evidence found that women and non-binary people make up at least 40% of the Company's executives. [2023 ESG Indicators, 2024: aes.com] <ul style="list-style-type: none"> • Met: Women and non-binary people make up at least 40% of the Company's board of directors: The 2023 Improving Lives Report indicates: 'Characteristics of our Directors as presented in our 2024 Proxy statement in March: Gender diversity 45%'. [2023 Improving Lives Report, 45377: aes.com]
L3.PD	Gender wage gap reporting	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Has closed gender wage gap or timebound commitment: The Company indicates on its website that: 'We've created new programs that enhance the integration of gender equality into our policies [...]. Specifically, we've committed to increasing representation of women in leadership at AES to 25 percent by 2020 and 30 percent by 2022. Tracking percentages of promotions and development rotations, we report results to our board of directors and purposefully provide female talent growth opportunities. We have set policies to create gender-diverse candidate pools and strive for a 50/50 balance of new hires in new positions. This includes our new "Energy4Talent" program to recruit and cultivate the next-generation of leaders directly from college. We're also ensuring appropriate pay ratios and rewards'. Moreover, the 2023 Improving Lives Report notes: 'AES Panamá is a member of UN Women; the Gender Parity Initiative aimed at reducing gender economic gaps'. The 2023 AES Andes Integrated Report 'Using global compensation methodologies that are aligned with local practices and market realities, our company continues its commitment to gender pay equity. [...] During the year under review, [...] the pay ratio between women and men is, on average, 3% higher for women'. AES Andes is one of the Company's subsidiaries. However, it is not clear it has already closed the gender wage gap companywide or that it has a timebound commitment for closing the gender wage gap, also for the entire Company. [How AES is closing the gender gap in the energy sector_web, n/d: aes.com] & [2023 Improving Lives Report, 45377: aes.com] • Not Met: Reports information at company level across multiple pay bands: See above. The 2023 AES Andes Integrated Report discloses data on Pay Gap Per Gender in Chile, Colombia and Termo Andes disclosing the means and the median for different positions: senior managers, managers, heads, other professionals, other technicians, administrative staff and service workers. However, no companywide information found. The Company reports on the percentage of women in different management positions. However, no information found on gender wage gap at the Company level across multiple pay bands. [2023 ESG Indicators, 2024: aes.com] & [2023 AES Andes Integrated Report, 2023: aesandes.com] • Not Met: Expects business relationships to do the same

JT. Just transition

Indicator Code	Indicator name	Score (out of 2)	Explanation
JT.1	Fundamentals of social dialogue and stakeholder engagement in a just transition	0.5	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Met: Public commitment to engage in social dialogue with appropriate parties for purposes of bipartite or tripartite negotiations: The 2021 Climate Scenario Report indicates: 'We support public and private actions to manage the impact on workers and communities dependent on fossil fuels as decarbonization accelerates, and we are committed to working with our stakeholders to foster just transitions. Governments, employers, unions and community organizations should work collaboratively, as we have been doing in Chile, to create transition plans tailored to the unique circumstances faced by each group of workers and their community. [...] we are committed to engaging and working with key stakeholders, including local and national governments, communities and unions to develop a transition plan designed with the local conditions in mind, that can include capacity building, social and economic development opportunities'. [2021 Climate Scenario Report, 2021: aes.com] • Not Met: Discloses the categories of stakeholders it engages with on a Just Transition and how they were identified.: As indicated above: 'Governments, employers, unions and community organizations should work collaboratively, as we have been doing in Chile, to create transition plans tailored to the unique circumstances faced by each group of workers and their community. [...] we are committed to engaging and working with key stakeholders, including local and national governments, communities and unions to develop a transition plan designed with the local conditions in mind, that can include capacity building, social and economic development opportunities'. The webpage section Accelerating responsible and just energy transitions indicates: 'As these transition [to green

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>energy] plans are designed, they must also keep the local conditions in mind to manage the impact on workers and communities that may be impacted by the closures of fossil fuel facilities[...]. The transition to green energy is a complex process that requires continuous engagement with all stakeholders, including local and national governments, customers, and local communities'. However, it is not clear how the stakeholders with whom to engage on these matters were identified. [2021 Climate Scenario Report, 2021: aes.com] & [Accelerating responsible and just energy transitions_ web, n/d: aes.com]</p> <ul style="list-style-type: none"> • Not Met: Disclosure of steps taken to engage with identified stakeholders and its approach to supporting a just transition.: The 2023 Improving Lives Report indicates: 'As we continue to transition out of coal and support communities through the transition to zero carbon, we recognize that workers, communities, governments, unions, and other stakeholders are concerned about their livelihoods. For our people, we aim to provide opportunities for internal mobility, as well as reskilling programs for the knowledge and skills needed to fully participate in the transition to a more renewable future either inside or outside the organization'. As indicated above, the webpage section Accelerating responsible and just energy transitions adds: 'As these transition plans are designed, they must also keep the local conditions in mind to manage the impact on workers and communities that may be impacted by the closures of fossil fuel facilities. [...] The transition to green energy is a complex process that requires continuous engagement with all stakeholders, including local and national governments, customers, and local communities'. In both texts, as well as in the AES Andes Talent Management & Benefits report, it discloses information on different reskilling courses and early retirement plans. However, it is not clear the steps it takes to engage with identified stakeholders (at a minimum including workers, unions or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law, and affected stakeholders) as part of its approach to supporting a just transition in which the Company is in continuous social dialogue and meaningful engagement with stakeholders. [2023 Improving Lives Report, 45377: aes.com] & [Accelerating responsible and just energy transitions_ web, n/d: aes.com] • Not Met: Demonstrates social dialogue and meaningful engagement with stakeholders on all aspects of a just transition.: The 2023 AES Andes Integrated Report indicates: 'The energy transition process has set a precedent for the company, due to the incorporation of new neighboring communities to our wind farms under construction in the southern zone. This translates into the strengthening of our community relations teams and the development of more robust action plans that allow a good performance of community management, and the implementation of social investment programs that are developed by the AES Chile Foundation team. [...] For instance, in Tocopilla and Mejillones, we established working groups, conducted in-person and remote meetings, and organized visits to our facilities as part of the Open Doors Program. The purpose of this program is to foster a closer relationship between the community and the company's work in the field of energy generation. The joint work was mainly framed in meetings with both municipalities to identify and evaluate the needs of their communes in the pillars of: "Community-use infrastructure and training for employability."'. It provides further information on reskilling trainings and open-doors programs it offers to local authorities. However, no evidence found of a social dialogue and meaningful engagement with stakeholders (at a minimum including workers, unions or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law, and affected stakeholders) on all aspects of a just transition in order to ensure the participation of all relevant stakeholders in the building of just transition policy frameworks. [2023 AES Andes Integrated Report, 2023: aesandes.com]
JT.2	Fundamentals of just transition planning	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Demonstrates how it engages in social dialogue, especially with unions and with stakeholders, in the development of its transition planning.: The 2023 AES Andes Integrated Report indicates: 'The energy transition process has set a precedent for the company, due to the incorporation of new neighboring communities to our wind farms under construction in the southern zone. This translates into the strengthening of our community relations teams and the development of more robust action plans that allow a good performance of community management, and the implementation of social investment programs that are developed by the AES Chile Foundation team. [...] For instance, in Tocopilla and Mejillones, we established working groups, conducted in-person and remote meetings, and organized visits to our facilities as part of the Open Doors Program. The purpose of this program is to foster a closer relationship between the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>community and the company's work in the field of energy generation. The joint work was mainly framed in meetings with both municipalities to identify and evaluate the needs of their communes in the pillars of: "Community-use infrastructure and training for employability." [...] During 2023, we developed the program of visits to the Angamos power plant. The year was marked by the presence of authorities such as the Undersecretary of Energy, the Regional Ministerial Secretariat of Energy, Fundación Imagen de Chile, and members of the Mejillones Industrial Association, who visited the plant to learn about its operation and the scope of the storage proposal designed for its reconversion. In total, we received 34 visitors as part of the Open Doors Program'. However, no evidence found of how it engages both in social dialogue - including with unions (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law) - and more broadly with stakeholders, in the development of its just transition planning. [2023 AES Andes Integrated Report, 2023: aesandes.com]</p> <ul style="list-style-type: none"> • Not Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on workers. • Not Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on affected stakeholders • Not Met: Sets time-bound and measurable indicators to mitigate social impacts of low carbon transition on business relationships.
JT.3.PD	Fundamentals of creating and providing or supporting access to green and decent jobs for an inclusive and balanced workforce	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Public Commitment to create and provide or support access to green and decent jobs, as part of the low carbon transition.: The Human Rights Policy indicates that: 'We are committed to providing infrastructure solutions that support a sustainable social, economic and environmental future'. The 2023 Improving Lives Report notes: 'As we continue to transition out of coal and support communities through the transition to zero carbon, we recognize that workers, communities, governments, unions, and other stakeholders are concerned about their livelihoods. For our people, we aim to provide opportunities for internal mobility, as well as reskilling programs for the knowledge and skills needed to fully participate in the transition to a more renewable future either inside or outside the organization'. It provides further information on the training courses it provides. At its feedback to, the Company has also made reference, to a 2021 report, however, it is considered outdated according to the three-reporting-year timeframe policy. It has also provided information on different training courses. However, no commitment found to create and provide or support access to green and decent jobs as part of the low carbon transition as 'aim at' is not considered a formal statement of commitment according to the wording criteria. [Human Rights Policy, n/d: aes.com] & [2023 Improving Lives Report, 45377: aes.com] • Not Met: Assesses and discloses the risk of employment dislocation caused by low carbon transition and related impacts on affected stakeholders. • Not Met: Demonstrates measures taken to create and support access to green and decent jobs for affected stakeholders.: The 2023 Improving Lives Report indicates: 'For our people, we aim to provide opportunities for internal mobility, as well as reskilling programs for the knowledge and skills needed to fully participate in the transition to a more renewable future either inside or outside the organization. [...] AES Chile continued with its Training Plan for Labor Reconversion, providing different courses with a theoretical and practical curriculum in partnership with a University and a technical institution, aimed at generating technical skills in new technologies, that will help employees to assume new roles in the future of energy, both inside and outside the organization. The plan also includes training to develop entrepreneurial skills. More than 420 people have been trained [...]. We also launched a reskilling program in AES Puerto Rico. This program seeks to requalify competencies in a hybrid training framework – both virtual and hands-on – in solar and batteries. A total of 50 employees signed up to participate in this project'. The webpage section Accelerating responsible and just energy transitions adds: 'In Chile, the AES Chile Training Plan for Labor Reconversion forms part of the plant retirement plans. The training program has had more than 325 participants and was designed to help employees assume new roles in the future of energy. In Hawaii, a similar renewable energy re-skilling training was offered when AES closed the last coal plant in the state, and nearly half of AES employees participated in the course'. Similarly, the AES Andes Talent Management & Benefits notes: 'In 2023, the [Labor Reconversion] Program had five fundamental axes: [...] 570 people have participated in the [...] Program. That increases the capability of AES to hire internal talents for its new renewable businesses and makes it possible to relocate employees that had their careers in nonrenewable assets. 70 positions so far have been fulfilled with employees that

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>participated on the program’. It provides further evidence of training for its workforce in Utah and Colorado. However, although the Company provides different examples of measures it takes to create and provide or support access to green and decent jobs for workers, no measures aiming at other affected stakeholders found. [2023 Improving Lives Report, 45377: aes.com] & [Accelerating responsible and just energy transitions_ web, n/d: aes.com]</p> <ul style="list-style-type: none"> • Met: Demonstrates measures taken to ensure green and decent jobs promoting equality of opportunity for women and vulnerable groups: The 2023 Improving Lives Report indicates: ‘For over 8 years, the AES Mujer program in El Salvador has certified more than 700 women as electrical technicians, enabling them to perform dependable and secure residential electrical installations’. The webpage section Mujeres Con Energia notes: ‘To promote gender equality in the organization, AES Colombia hired 111 women for the construction of the Parque Castilla Solar project, to work in various technical, operational and administrative roles during the construction process. This is part of the successful #MujeresConEnergía campaign that was started 6 years ago to hire women across the operations and maintenance of Chivor. Today the company has women in both technical and administrative areas, from entry-level positions to management. AES Colombia also promotes the incorporation of female interns, apprentices and temporary employees in its operation, seeking new talents in technical areas of the electricity sector as well as industrial security, treasury, accounting, management and performance, among other areas’. Finally, the webpage section Yampa Solar states: ‘AES has partnered with Solar Energy International (SEI), a leading solar training educational non-profit organization, to provide workforce development services in Colorado. These services include an AES-funded scholarship for 15 Colorado residents to enrol in SEI’s North America Board of Certified Energy Practitioners (NABCEP) PV Associates online training package. This 10-week solar installation training program targets veterans, formerly incarcerated citizens returning to the workforce, and high school-aged adults from underserved communities’. [2023 Improving Lives Report, 45377: aes.com] & [MujeresConEnergía_ web, n/d: aes.com]
JT.4.PD	Fundamentals of retaining and re- and/or up-skilling workers for an inclusive and balanced workforce	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Public commitment to re-and/or up-skills workers displaced by the transition to a low carbon economy. • Not Met: Disclosure of its process(es) for identifying skills gaps for workers and affected stakeholders, in the context of the low carbon transition. • Met: Demonstrates measures taken to provide re-and/or upskilling, training or education opportunities for relevant stakeholders.: The 2023 Improving Lives Report indicates: ‘We plan to responsibly exit the majority of our coal businesses by 2025 and all coal assets by 2027. We will continue offering reskilling and training to our people so they can be part of the green energy future. [...] We also launched a reskilling program in AES Puerto Rico. This program seeks to requalify competencies in a hybrid training framework – both virtual and hands-on – in solar and batteries. A total of 50 employees signed up to participate in this project. [...] For our people, we aim to provide opportunities for internal mobility, as well as reskilling programs for the knowledge and skills needed to fully participate in the transition to a more renewable future either inside or outside the organization’. Also: ‘As the clean energy sector grows rapidly, we see a critical need to approach workforce development in a people-positive way. This starts with equitable access to high-quality Science, Technology, Engineering, Math (STEM) education and carries into direct training programs and initiatives for the clean energy workforce of the future. At the kindergarten through 12th grade level, AES is proud to support students through curriculum development partnerships, educational tours of our sites, and capacity building workshops for STEM educators. At the university level, AES partners provide programmatic support for students as well as funding for research opportunities. For direct workforce training, we partner with union labor organizations and accredited training institutions to ensure prospective workers have the educational and training resources they need to participate in the clean energy transition’. [2023 Improving Lives Report, 45377: aes.com] • Not Met: Demonstrates measures taken to ensure that the re-and/or upskilling, training or education opportunities promoting equality of opportunity for women and vulnerable groups. : The webpage section Mujeres Con Energia notes: ‘To promote gender equality in the organization, AES Colombia hired 111 women for the construction of the Parque Castilla Solar project, to work in various technical, operational and administrative roles during the construction process. This is part of the successful #MujeresConEnergía campaign that was started 6 years ago to hire women across the operations and maintenance of Chivor. Today the company has women in both technical and administrative areas, from entry-level positions to

Indicator Code	Indicator name	Score (out of 2)	Explanation
			management. AES Colombia also promotes the incorporation of female interns, apprentices and temporary employees in its operation, seeking new talents in technical areas of the electricity sector as well as industrial security, treasury, accounting, management and performance, among other areas. With the challenge of #MujeresConEnergía, AES Colombia has implemented different initiatives to raise awareness of the value of equity within companies, yielding positive results directly related to saving and effective management of resources, empathy with communities and problems with solutions efficient'. However, it is not clear how the measures it takes to ensure that the re- and/or up-skilling, training or education opportunities [in just transition plans] embed equality of opportunity for women and vulnerable groups. [MujeresConEnergía_web, n/d: aes.com]
JT.5.PD	Fundamentals of social protection and social impact management for a just transition	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Discloses contribution to social protection systems for relevant stakeholders, and expectations on business relationships to contribute to social protection of affected stakeholders. • Not Met: Discloses its processes for identifying impacts of low carbon transition on workers' and affected stakeholders' social protection. • Not Met: Demonstrates contribution to addressing the impact of the low carbon transition on workers' social protection. • Not Met: Demonstrates contribution to addressing the impact of the low carbon transition on affected stakeholders' social protection.
JT.6.PD	Fundamentals of advocacy for policies and regulation on green and decent job creation, employee retention, education and reskilling, and social protection supporting a just transition	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Discloses process(es) for aligning its lobbying activities with policies and regulation supporting the just transition. • Not Met: Discloses where its lobbying activities do not align with policies and regulation that support the just transition. • Not Met: Discloses action plan addressing misalignment of lobbying activities with policies and regulation that support just transition. • Not Met: Demonstrates lobbying for just transition and regulations enabling green and decent jobs, reskilling and/or social protection: The 2023 Improving Lives Report indicates that the Company is a 'member of the American Clean Power Association'. In 2022, the American Clean Power Association announced 'its Energy Transition for All initiative – an industry-wide framework to ensure that workers, communities, and those historically left behind stand to benefit from the rapid growth of the clean power sector in the United States. The initiative was launched today with the release of a report containing an outline of multi-year industry objectives to realize those goals'. The initiative has three pillars: 'Expand opportunity for workers, especially those from transitioning and historically disadvantaged communities; Create value for communities through supply chains, targeted investments, and local economic development; Lead in diversity and inclusion, striving towards a workforce and leadership teams that are representative of the communities we operate in. ACP and its member companies will pursue programs across these three pillars as part of a multi-year initiative'. However, although it is partnership with different actors, it is not clear it actually lobbies for just transition policies. [2023 Improving Lives Report, 45377: aes.com] & [Clean Power Institute_web, n/d: cleanpowerinstitute.org]

3.a Responses to risks of exposure to forced labour (10% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(0).0	Serious risks of supply chain forced labour		<ul style="list-style-type: none"> • Area: Exposure to high risk of forced labour • Story: According to recent data, approximately 35% of the world's polysilicon, and 32% of global metallurgical grade polysilicon, the material from which polysilicon is made, is produced in Xinjiang Uyghur Autonomous Region (XUAR). Investigations by UN bodies, academics and journalists have presented evidence on a number of human rights abuses including the use of forced labour in XUAR. In its July 2022 report to the UN General Assembly, the UN Special Rapporteur on Contemporary Forms of Slavery "regards it as reasonable to conclude that forced labour among Uyghur, Kazakh and other ethnic minorities has been occurring in the Xinjiang Uyghur Autonomous Region of China" and finds that some instances of forced labour in the Region "may amount to enslavement as a crime against humanity". The Special Rapporteur states he "considers that indicators of forced labour pointing to the involuntary nature of work rendered by affected communities have been present in many cases" in the context of "State-mandated systems". Further analysis by independent UN experts concluded that the violations in the Region "may constitute international crimes, in particular crimes against humanity" and have urged China to address their "repeatedly raised concerns about widespread violations of the rights of Uyghurs and other Muslim

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>minorities in the Xinjiang Uyghur Autonomous Region (XUAR) on the basis of religion or belief and under the pretext of national security and preventing extremism".</p> <p>[United Nations General Assembly, 19/07/2022, "Contemporary forms of slavery affecting persons belonging to ethnic, religious and linguistic minority communities - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences": documents-dds-ny.un.org] [United Nations Special Procedures, 07/09/2022, "Xinjiang report: China must address grave human rights violations and the world must not turn a blind eye, say UN experts": ohchr.org] [International Service for Human Rights, "Repository of United Nations recommendations on human rights in China": ishr.ch] [Business and Human Rights Resource Centre, 02/08/2021, "China: Significant proportion of global solar panel supply chains to raw materials level, including names of suppliers and locations for all destination markets"]</p>
M(0).1	Publication of independently verified full solar panel supply chains to raw materials level, including names of suppliers and locations for all destination markets	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Public commitment to full solar supply chain transparency: In 2021 the Company provided a statement to the Business and Human Rights Resource Centre, indicating ' Together with SEIA and The American Clean Power Association (ACP), we are analyzing this issue in depth to identify appropriate actions that will effectively verify and address any allegations of forced labor. We are also examining how the industry can proactively support developing supply chains in areas with stronger regulations and greater transparency. We are in constant communication with our suppliers to understand the actions they are taking in creating certification protocols, and as we receive updated information, we analyze the validity of information they receive from consultants and legal counsel. Most importantly we continue to focus our procurement to those firms whose supply chains are in locations where we feel confident that labor practices are acceptable and traceable. We remain committed to working with solar module manufacturers that align with our principles and ethical standards, particularly regarding human rights. AES purchases from JinkoSolar do not include the use of forced labor in any part of the supply chain, as demonstrated by their supplier qualifications and traceability protocols.' However, this statement does not suggest the Company is committed to fully transparent mapping of its entire solar supply chain. <p>The Company provided further comments to the BHRRC, highlighting being signatory to both SEIA's Supply Chain Transparency Protocol and the American Clean Power Association's Pledge against Forced Labor. However, the evidence provided was already in use and is not considered sufficient for this indicator. [Business and Human Rights Resource Centre, 26/07/2021, "AES responds": business-humanrights.org]</p> <ul style="list-style-type: none"> • Not Met: Publication of verified full solar supply chains: The Company discloses the total number of tier-1 suppliers screened in 2022. However, no information was found on the names or locations of suppliers or any information on suppliers beyond tier-1. [2023 ESG Indicators, 2024: aes.com]
M(0).2	The company explains steps taken and how these align with steps expected by the UN Guiding Principles (including reference to assessment of severity of risks, leverage, and crucial nature of business relationships)	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Steps taken aligned with UNGPs • Not Met: Information relevant to all destination markets

3.b Serious Allegations (10% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: Land Rights • Headline: Allegations of inadequate consultation with communities in Colombia • Story: Allegations include a lack of adequate consultation with traditional communities, with claims that AES is negotiating with non-ancestral groups, leading to internal disputes. The local clan expressed frustration over being recognized only as beneficiaries rather than potential partners, which they believe results in charity-based compensations rather than equitable arrangements. Additionally, there are concerns regarding inadequate dissemination of environmental impact studies, which has left communities feeling excluded from meaningful discussions and decision-making processes. Furthermore, there are significant concerns regarding the company's compensation agreements, where payments are linked to energy output rather than the number of wind turbines installed, raising fears that communities could receive reduced compensations as technology improvements lead to fewer turbines than originally planned. [Heinrich Böll Foundation, 04/2023, "The Wayuu wind flies through the sea and the guajiro land": co.boell.org]
M(1).1	The company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Public response: When prompted for a response to the allegation by the Business and Human Rights Resource Centre, the Company did not respond. In an interview in July 2024 with the platform bnamerica, the Company responded to question on the social resistance against the project that 'Regarding the social aspect, we've had more than 10 years of relationship-building with the communities surrounding the project, establishing trust and involving them in every phase of the project. In this relationship, we've uncovered a positive interest in the project from the communities. However, it's important to have greater government support to guarantee each of the agreements we build with the communities so that, together, we can achieve the social development we seek with our presence in the territory. [...] The vision of social responsibility that we've had at AES Colombia, where we operate in Boyacá, Meta, Huila and La Guajira, has allowed us to support community initiatives that help in their development, primarily in productive projects, but always maintaining a function of a partnership where both the community and the company do their part. Under this vision, in 2023, AES Colombia developed social programs in Boyacá, Meta, Huila, and La Guajira, where it has operations, benefiting more than 30,000 people and achieving an investment of over 10 billion pesos [US\$2.5mn]. <p>Some of these programs included agricultural production projects in Boyacá, the entrepreneurship, self-management, and associativity program in Aipe, and the Ruta del Agua, which supplies over 960,000 litres of water to Wayúu communities in La Guajira, among others' However, the response does not address the allegations of land grabbing and lack of consultation with traditional land owners and local communities. [bnamericas, 13/07/2024, "How AES aims to propel Colombia's wind power market": bnamericas.com] [Business and Human Rights Resource Centre, 16/08/2023, "Colombia: ONG publica libro sobre las preocupaciones ambientales y en derechos humanos de los parques eólicos en La Guajira": business-humanrights.org]</p> <ul style="list-style-type: none"> • Not Met: Detailed response
M(1).2	The company has investigated and taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders: The Company provided comments regarding this indicator, outlining its continuous engagement with Wayúu communities in La Guajira. However, this indicator is looking for an engagement with stakeholders affected by the alleged rights violation. No relevant evidence was found. • Not Met: Identified cause: The Company provided comments regarding this indicator, outlining its improvements to its human rights systems since 2020. However, this indicator is looking for an investigation into the root causes alleged rights violation. No relevant evidence was found. • Not Met: Identified and implemented improvements: The Company provided comments regarding this indicator, outlining its improvements to its human rights systems since 2020. However, this indicator is looking for specific reviews of policies and practices following an allegation of human rights violations. No relevant information was found • Not Met: Stakeholder input to steps taken

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Provided remedy: In the interview with bnamericas that Company states that it considers social contributions to the local communities: 'The vision of social responsibility that we've had at AES Colombia, where we operate in Boyacá, Meta, Huila and La Guajira, has allowed us to support community initiatives that help in their development, primarily in productive projects, but always maintaining a function of a partnership where both the community and the company do their part. Under this vision, in 2023, AES Colombia developed social programs in Boyacá, Meta, Huila, and La Guajira, where it has operations, benefiting more than 30,000 people and achieving an investment of over 10 billion pesos [US\$2.5mn]. Some of these programs included agricultural production projects in Boyacá, the entrepreneurship, self-management, and associativity program in Aipe, and the Ruta del Agua, which supplies over 960,000 litres of water to Wayúu communities in La Guajira, among others' However, there is no indication that the measures taken are aimed at remediating the human rights harm alleged. <p>The Company further states "Jemeiwaa Ka'l, AES Colombia's wind project, is located within the Wayuu Indigenous Reserve of the Upper and Middle Guajira region, and its areas of influence are inhabited by approximately 10,700 people, grouped into 113 communities. The project's social team has conducted exhaustive territorial surveys, engaging with the community and the Wayuu culture, ensuring that the relationship between the company and the inhabitants is based on mutual recognition and the ability to add value to all involved. For AES Colombia, this relationship is crucial to the project's success and future sustainability, and is therefore expected to have a positive impact on the following aspects: Strengthening and preserving ancestral Wayuu customs and practices. Job creation in the region. Economic and business development through the acquisition of local goods and services. Access to essential resources such as water and energy in the area. Coordination and financial support for the implementation of communities' own life plans." However, there is no indication that the measures taken are aimed at remediating the human rights harm alleged [bnamericas, 13/07/2024, "How AES aims to propel Colombia's wind power market": bnamericas.com] [AES Colombia, 2023 Sustainability Report: aescol.com]</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders
M(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Area: Right to a safe, clean, healthy, and sustainable environment • Headline: Small farmers neighboring wind farms in Pernambuco suffer from depression, insomnia and deafness due to noise from wind turbines • Story: In 2014, two power generation parks, totalling 220 towers in the rural area of the municipality in the agreste of Pernambuco, were installed in the rural communities of Sobradinho and Pau Ferro. They have become an endurance test for a group of 120 smallholder families who live very close to them due to the loud and uninterrupted noise produced by the wind turbines. Residents report that the towers, 120 meters high and with 50-meter propellers, foster anxiety, insomnia and depression, which has caused many there to start taking anxiolytics. They also talk about the scares caused by the shadows of the propellers, the division of families and the forced departure from their farms. The fear of activists and researchers is that the model implemented in Caetés will spread to other cities that are currently the target of interest by companies. Residents of Sobradinho are traveling to cities in the Northeast to present their experience and convince farmers not to give up their land. AES Brazil acquired the Wind park in November 2022. <p>[Mongabay, 04/09/2023, "In Brazil, rural communities are caught in the eye of the wind farm storm": news.mongabay.com] [bbc, 14/08/2023, "Depression, insomnia, deafness: the drama of farmers who live under a wind farm in the city of Lula": bbc.com]</p>
M(2).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Public response: AES Brasil, a subsidiary of the Company, said in a statement that, since it acquired the wind park in November 2022, it has carried out a "communication campaign to present itself to neighboring communities as the new company responsible for the venture, as well as to make its channels available service." Regarding the concerns the local residents raised the Company stated that 'it has evaluated all the issues raised by the community and maintained periodic dialogues with the group of representatives of the families and the lawyer who represent them and, therefore, is confident that together they will reach a solution to the issue.' The Company further stated that 'it has been maintaining a permanent dialogue with community representatives in search of a solution that

Indicator Code	Indicator name	Score (out of 2)	Explanation
			prioritizes the well-being and safety of all' [Mongabay, 04/09/2023, "In Brazil, rural communities are caught in the eye of the wind farm storm": news.mongabay.com] [bbc, 14/08/2023, "Depression, insomnia, deafness: the drama of farmers who live under a wind farm in the city of Lula": bbc.com] • Not Met: Detailed response: The response provided by the Company does not indicate which issues it will be addressing. It does not cover the specific rights violations alleged by the local community.
M(2).2	The Company has appropriate policies in place	0	The individual elements of the assessment are met or not as follows: • Not Met: Engaged with stakeholders: While the Company indicates it has several communication channels with the local community, no evidence as found that the Company is engaging with the local community in order to understand what the underlying causes of the alleged impacts are. • Not Met: Identified cause • Not Met: Identified and implemented improvements • Not Met: Stakeholder input to steps taken
M(2).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: • Not Met: Provided remedy • Not Met: Remedy satisfactory to stakeholders

4. Low-Carbon Transition Assessment (20% of total)

Indicator Code	Indicator name	Score (%)	Explanation
n/a	Emissions targets	0	1. Has the Company set and disclosed a Scope 1+2 short term target? No / without evidence 2. Has the Company set and disclosed a Scope 1+2 long term target set? No, without evidence 3. Is the Scope 1+2 short term target aligned with a net zero emissions scenario? No / without evidence 4. Is the Scope 1+2 long term target aligned with a net zero emissions scenario? No / without evidence 5. Has the Company set and disclosed a Scope 3 short term target? No / without evidence 6. Has the Company set and disclosed a Scope 3 long term target? No / without evidence 7. Is the Scope 3 short term target aligned with a net zero emissions scenario? No / without evidence 8. Is the Scope 3 long term target aligned with a net zero emissions scenario? No / without evidence
n/a	Share of Low Carbon CAPEX	0	n/a – information not available, without evidence
<u>Final score</u>		0	

Disclaimer

This scorecard is based on assessments of publicly available documents on companies' websites by the EIRIS Foundation and BHRRC. Preliminary assessments were shared with companies for feedback. Feedback provided by companies has been analysed and incorporated when relevant to the indicator assessed. Information published or provided by companies after established and communicated cut-off dates* are not included for this year's Benchmark. As such this scorecard should be seen as a reflection of feedback received as of April 2025.

The use of the label "Not met" in the research does not necessarily mean that the company does not meet the requirements as they are described in the accompanying bullet point short text. Rather, it means that the analysts could not find information in

* Cut-off dates: 31 January 2025 for companies that did not engage with the benchmark; the expiration of the feedback period (25 April 2025) for companies that engaged with the benchmark and provided additional documents published during that period.

public sources that met the requirements as described in full in the 2025 Renewable Energy & Human Rights Methodology document. It is possible that a Company meets the criteria without yet publishing the relevant evidence of doing so. This may include cases where a company has claimed to meet the criteria in the engagement phase or otherwise but where the public record was still not sufficient to meet the criteria by the relevant cut off dates.

While the EIRIS Foundations and BHRRC have made reasonable endeavours to ensure that the methodology reflects best and emerging business and human rights practice in identifying, preventing, mitigating and remedying human rights harms as well as other responsible business conduct, it is not currently possible to measure certain human rights harms or other negative impacts directly. As such, a low score in respect of a particular indicator should not be read as implying that harms are necessarily taking place: rather it is a sign that companies have not demonstrated the steps set out in the methodology to reduce the risk of such harms or to uphold other responsible business conduct in the ways described. Conversely, a high score in a particular section or for a specific indicator should not be interpreted as a guarantee of future absence of human rights harm.

Scores for companies in the different project developer sub-categories (electric utilities, oil and gas, independent power producers) should not be compared to one another as these categories have been designed to allow for integration of an assessment of efforts towards full decarbonisation of energy production for project developers and oil and gas companies, based on the World Benchmarking Alliance's Oil & Gas and Electric Utilities Benchmark, using ACT methodologies. **Scores for equipment (wind turbines and solar) manufacturers should not be compared to project developer scores** as indicators have been tailored to reflect their position in renewable energy value chains.

Caution should be exercised in interpreting small differences in scores between companies within the same category and particularly small differences in the overall weighted scores because of the diversity of independent elements that are combined to produce the overall weighted scores. Scores should be understood in the context of the methods and weightings explained in the Methodology.

BHRRC does not make any guarantee or other promise, representation, or warranty as to the truth, accuracy, reliability or completeness of the statements of fact contained within, or any results that may be obtained from using its content. BHRRC does not have any obligation to provide the users of the Benchmark with additional information or to update the information contained therein or to correct any inaccuracies. That said, the assessment process has been conducted by BHRRC and its research partner the EIRIS Foundation in good faith and in the spirit of dialogue and cooperation.

Neither this content, nor any examples cited, constitute investment advice, nor should it be used to make any investment decision without first consulting one's own financial advisor and conducting one's own research and due diligence. BHRRC does not receive any payment, compensation, or fee for the use or citation of any information included in this content. To the maximum extent permitted by law, BHRRC disclaims any and all liability in the event any information, commentary, analysis, opinions, advice, and/or recommendations prove to be inaccurate, incomplete, or unreliable, or result in any investment or other losses. We reserve the right to disallow users from further using our data if, in our assessment, these are used to attempt, perpetuate, or cause harm and violations of human rights.

This work is the product of the Business & Human Rights Resource Centre, licensed under a Creative Commons [Attribution-NonCommercial-ShareAlike 4.0](https://creativecommons.org/licenses/by-nc-sa/4.0/) International License. Commercial use of this material or any part of it will require a license. Those wishing to commercialise the use of this work should contact the Business & Human Rights Resource Centre. Indicators in Themes A, B, C, JT and first section of M and Low-Carbon Transition scores (ACT) are the product of the World Benchmarking Alliance. Our work is licensed under the Creative Commons Attribution 4.0 International License. To view a copy of this license, visit creativecommons.org