



**Business & Human Rights  
Resource Centre**



# **Renewable Energy & Human Rights Benchmark Methodology**

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# Introduction

The Renewable Energy & Human Rights Benchmark **aims to drive a race to the top among renewable energy companies on human rights** in the context of an urgent need for climate action.

It is part of the broader movement and actions by civil society, investors, governments, and companies to **embed human rights in our future low-carbon energy system**.

## The benchmark supports:

- ➔ **Investors** to use their leverage through stewardship, investment practices and policy engagement to help embed human rights in renewable energy.
- ➔ **Companies** to embed human rights due diligence in their operations and value chains.
- ➔ **Governments** to create a level playing field or companies incl. through human rights due diligence policy and regulation and business incentives.
- ➔ **Civil society** to hold companies accountable for human rights abuses.



# Methodology

The Renewable Energy & Human Rights Benchmark's methodology is built on widely recognized international standards including the UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises, IFC Performance Standards, and other issue-specific authoritative references. The benchmark aligns with existing benchmarks and uses indicators developed by the World Benchmarking Alliance (WBA) wherever possible. Due to the cross-cutting nature of the Renewable Energy & Human Rights Benchmark, this includes indicators from the Corporate Human Rights Benchmark as well as Climate & Energy benchmarks. Business & Human Rights Resource Centre undertook two public consultations (in 2017 and in 2023) and a company feedback questionnaire to refine the Benchmark's methodology.

## Key updates: Company selection

The Renewable Energy & Human Rights Benchmark ranks 36 key publicly traded companies in the wind and solar sector.

### Project developers

The Benchmark will continue to focus on the largest wind and solar project developers based on total installed capacity of project and, based on consultation feedback, will also cover key developers of strategic and regional importance in the industry.

The following project developers are included in the scope of the 2025 edition of the Benchmark:

#### Electric Utilities companies

- › **AES Renewables** (USA)
- › **CLP Holdings** (Hong Kong)
- › **Duke Energy** (USA)
- › **EDF Renewables** (France)<sup>1</sup>
- › **Eletrobras** (Brazil)
- › **Enel Green Power** (Italy)<sup>2</sup>
- › **Energias de Portugal** (EDP)
- › **Engie** (France)
- › **Iberdrola** (Spain)
- › **NextEra Energy** (USA)
- › **Ørsted** (Denmark)
- › **RWE** (Germany)
- › **Southern Company** (USA)
- › **Tata Power** (India)

#### Independent Power Producers<sup>3</sup>

- › **ACCIONA Energía** (Spain)
- › **Adani Green Energy** (India)
- › **Apex Clean Energy** (USA)
- › **Brookfield Renewables Partners** (Canada)
- › **Invenergy** (USA)
- › **Juwi Renewables** (Germany)

#### Oil & gas companies

- › **Lightsource bp** (part of bp) (UK)<sup>4</sup>
- › **Shell Plc** (UK/Netherlands)
- › **TotalEnergies** (France)

## Manufacturers

The Benchmark will be covering key wind turbine and solar panel manufacturers due to the key role they play in the sector. Companies in these sectors have been selected based on total shipments of wind turbines or solar panels by GW capacity as of December 2024, and adjusted for geographic balance.

The following manufacturers are included in the scope of the 2025 edition of the Benchmark:

### Solar panel manufacturers

- › **First Solar** (USA)
- › **Hanwha Qcells** (part of Hanwha Solutions) (South Korea)
- › **JA Solar** (China)
- › **Jinko Solar** (China)
- › **LONGi Solar** (China)
- › **Canadian Solar** (Canada)
- › **Trina Solar** (China)

### Wind turbine manufacturers

- › **GE Vernova** (USA)
- › **Goldwind** (China)
- › **Nordex** (Germany)
- › **Siemens Gamesa** (part of Siemens Energy) (Germany)
- › **Suzlon** (India)
- › **Vestas** (Denmark)

## Key updates: Methodology

- ➔ **Alignment with relevant benchmarks:** Indicators in the Benchmark have been brought to align more closely with World Benchmarking Alliance indicators (including [CHRB 2024 revised methodology](#), Just Transition and ACT) and other benchmarks where relevant. The methodology relies on international standards and best practices, which are cross-referenced.
- ➔ **Scoring simplification:** To simplify and align with other WBA benchmarks, the Renewable Energy & Human Rights Benchmark adopted WBA's unified scoring approach. Under this system, each element is scored independently and carries equal weight within an indicator. All indicators carry equal weight within a measurement area and are scored on a scale from 0 to 2. Measurement areas will continue to be individually weighted.
- ➔ **Indicator clarification:** All indicators have been reviewed and adjusted for clarity and to reflect best practices based on feedback.

## Methodology sections

The Renewable Energy & Human Rights Benchmark's methodology is anchored to international standards on business and human rights and relies on existing indicators of the World Benchmarking Alliance where possible. It is split across four parts:

- 1. Core policies and practices based on the UN Guiding Principles:** Indicators follow the World Benchmarking Alliance's Corporate Human Rights Benchmark.
- 2. Salient human rights issues:** Specific policy, practice and performance proxies for key salient risks and issues for the wind and solar energy sectors.
- 3. Serious allegations:** Assessment of responses to serious allegations of negative impacts.
- 4. Low-carbon transition:** WBA utilities/oil & gas benchmark scores will be cross-referenced for relevant project developers (Electric Utilities and Oil & Gas companies).

## Guidance on documents considered for the assessment

- ➔ The assessment considers publicly available disclosure from the company's website(s), its formal financial and non-financial reporting or other types of documents such as reports and policy statements.
- ➔ Documents need to specifically be applicable / refer to the assessed company. When the company is a subsidiary of a group, group-level / parent company documents will be considered if they explicitly apply to subsidiaries.
- ➔ An exception to this general rule is where the methodology requires a statement of policy. This is the case for the indicators A.1, A.2, A.3, A.5, D1, E1, G1 and I3. In these cases, commitments must be made in formal policy documents. These are documents approved at the highest levels of the business. Policy commitments are considered important to set the "tone at the top" of the company that is needed to continually drive respect for human rights into the core values and culture of the business. It indicates that top management considers respect for human rights to be a minimum standard for conducting business with legitimacy; it sets out their expectations of how staff and business relationships should act, as well as what its stakeholders can expect of the company. It should trigger a range of other internal actions that are necessary to meet the policy in practice.

## Note on comparison of scores

- ➔ Due to methodology revisions in 2023, scores of companies in 2019 and 2021 benchmarks should not be compared directly.
- ➔ The benchmark's methodology aims to capture both baseline expectations of companies as well as aspirational practices. The salient human rights issues section was specifically developed with a view to capture leading best practices where only the most advanced companies will achieve full scores.
- ➔ Scores for companies in the different project developers' sub-categories (electric utilities, oil & gas, independent power producers) should not be compared to one another as these company assessment categories have been designed to allow for integration of an assessment of efforts towards full decarbonisation of energy production portfolio for electric utilities and oil & gas companies, based on the World Benchmarking Alliance Oil & Gas Benchmark and Electric Utilities Benchmark, using ACT methodologies. Scores of companies can be compared against each other within their specific sub-sectors.
- ➔ Scores for equipment (wind turbines and solar) manufacturers should not be compared to project developers' scores as indicators have been tailored to reflect their position in renewable energy value chains. Scores of companies can be compared against each other within their specific sub-sectors.

# 1. Core UNGP Indicators from the WBA's Corporate Human Rights Benchmark<sup>5</sup>

## Theme A. Governance and Policy Commitments

### A.1 Commitment to respect human rights

Sources: CHRB A01; UNGP 11 and 12; UNGPRF A1; GRI 103-2

The Company publicly commits to respecting all internationally recognised human rights across its activities. It must be clear the commitment relates to all internationally recognised human rights, rather than to only one or more selected human rights. This only considers commitments to avoid adverse human rights impacts and does not include philanthropic commitments.

- ➔ **A:** The Company has a publicly available policy statement committing it to respect human rights.
- ➔ **B:** The Company's publicly available policy statement commits it to the UN Guiding Principles on Business and Human Rights or the OECD Guidelines for Multinational Enterprises.

### A.2 Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work

Sources: CHRB A02; UNGP 12 and 16(c), UNGPRF, A1; FLA Code of Conduct; GRI 103-2

The Company publicly commits to respecting the principles concerning fundamental rights at work in the eight ILO core conventions as set out in the Declaration on Fundamental Principles and Rights at Work. It also has a publicly available statement of policy committing it to respect the human rights of workers in its business relationships.

- ➔ **A:** The Company has a publicly available policy statement committing it to respect the human rights that the ILO has declared to be fundamental rights at work.
- ➔ **B:** The Company has a publicly available policy statement that expects its business relationships to commit to respecting the human rights that the ILO has declared to be fundamental rights at work.

## The five fundamental principles and rights at work

The ILO Declaration on Fundamental Principles and Rights at Work covers the following five fundamental principles and rights at work, laid out in the referenced conventions:

- ➔ Freedom of association and the effective recognition of the right to collective bargaining (Convention No.87 and No.98)
- ➔ Elimination of all forms of forced or compulsory labour (Convention No.29 and No.105)
- ➔ Effective abolition of child labour (Convention No.138 and No.182)
- ➔ Elimination of discrimination in respect of employment and occupation (Convention No.100 and No.111)
- ➔ Safe and Healthy Working Environment (Convention No. 155 and No.187)

Additional ILO labour standard:

- ➔ Working hours (Convention No.1, No.14, No.30 and No.106)

### A.3 Commitment to remedy

Sources: CHRB A08; UNGP 22; UNGPRF C6

The Company publicly commits to providing for or cooperating in remediation for affected individuals, workers and communities through legitimate processes (including judicial and non-judicial mechanisms, as appropriate), where it identifies that it has caused or contributed to adverse impacts.

- ➔ **A.** The Company has a publicly available policy statement committing it to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to.
- ➔ **B.** The Company expects its business relationships to commit to the right to remedy.
- ➔ **C.** The Company has a publicly available policy statement committing it to co-operate with judicial and non-judicial mechanisms to provide access to remedy.
- ➔ **D.** The Company has a publicly available policy statement committing it to work with business relationships to remedy adverse impacts which are directly linked to the company's operations, products or services.

## A.4 Commitment from the top

Sources: CHRB B01 and B03; UNGP 16(a); UNGPRF A1.1 and A2; GRI 102-26

The Company's human rights policy commitments are communicated at board level and a board member or board committee oversees the Company's strategy, policies and processes for respecting human rights. The board member or board committee possesses relevant knowledge, skills and competence in the area of human rights. Board members or the chief executive officer (CEO) talk publicly about the Company's approach to addressing risks to people and the importance of human rights to the business.

**Note:** Management-level responsibility is assessed under indicator B.1. and therefore, not considered in this indicator.

- ➔ **A.** The Company indicates that a board member or board committee is tasked with specific governance oversight of respect for human rights.
- ➔ **B.** The Company describes the human rights expertise of the board member or board committee tasked with that governance oversight.
- ➔ **C.** Board members or the CEO clearly signal the Company's commitment to human rights (e.g., speeches, presentations or other communications) discussing why human rights matter to the business or any challenges to respecting human rights encountered by the business.
- ➔ **D.** The CEO or at least one board member have an incentive or performance management scheme linked to the company's human rights policy commitment(s) or strategy, with public criteria.

## A.5 Responsible lobbying and political engagement fundamentals

Source: World Benchmarking Alliance's Core Social Indicator 18 (CSI 18)

The Company has an approach to lobbying and political engagement and has related controls in place.

- ➔ **A.** The Company has a publicly available policy statement(s) (or policy(ies)) setting out its lobbying and political engagement approach.
- ➔ **B.** The Company discloses the total monetary value of financial and in-kind political contributions made directly by the organisation by country and by recipient/beneficiary.<sup>6</sup>
- ➔ **C.** The Company discloses the total monetary value of financial and in-kind political contributions made indirectly by the organisation by country and by recipient/beneficiary, including its lobbying expenses.
- ➔ **D.** The Company requires third-party lobbyists to comply with its lobbying and political engagement policy (or policies).

## Theme B. Embedding Human Rights Due Diligence

### B.1 Responsibility and resources for day-to-day human rights functions

Sources: CHRB C01; UNGP 19; UNGPRF A2 and A2.1; GRI 102-19 and 102-20

The Company outlines senior level responsibility for human rights within the Company as well as the organisation of the day-to-day responsibility for human rights across relevant internal functions. This includes responsibility for the ILO core labour standards at a minimum. The Company also allocates resources and expertise for the day-to-day management of human rights within its operations and business relationships

**Note:** Board level responsibility is assessed under indicator A.4 and therefore not considered in this indicator

- ➔ **A.** The Company indicates the senior manager role(s) accountable for implementation and decision making on human rights issues within the Company.
- ➔ **B.** The Company describes how it assigns responsibility for implementing its human rights policy commitment(s) for day-to-day management across relevant departments.
- ➔ **C.** The Company describes how it allocates resources and expertise for the day-to-day management of relevant human rights issues within its own operations.
- ➔ **D.** The Company describes how it allocates resources and expertise for the day-to-day management of relevant human rights issues within its supply chain.

### B.2 Identifying human rights risks and impacts

Sources: CHRB D01; UNGP 17 and 18; UNGPRF B2 and C3; HRIB, 1.2.1; GRI 412-1 and 414-2

The Company proactively identifies its human rights risks and impacts on an on-going basis, including when these are triggered by key moments in the Company's activities (e.g. policy change, market entry, new projects). This includes engaging with stakeholders and vulnerable groups as part of the identification process.

- ➔ **A.** The Company describes the process(es) it uses to identify its human rights risks and impacts in specific locations or activities, covering its own operations.
- ➔ **B.** The Company describes the process(es) it has in place to identify its human rights risks and impacts through relevant business relationships, including its supply chain.
- ➔ **C.** The Company describes how it involves affected stakeholders and internal or independent external human rights experts in its human rights risks and impact identification process(es).
- ➔ **D.** The Company describes how its risk and impact identification process(es) are triggered by new country operations, new business relationships, new human rights challenges or conflict affecting particular locations.

### B.3 Assessing human rights risks and impacts

**Sources:** CHRB D02; UNGP 17, 18 and 24; UNGPRF B1, B2 and C3; HRIB, 1.2.1.; GRI 412-1 and 414-2

Having identified its human rights risks and impacts, the Company assesses them and then prioritises its salient human rights risks and impacts. This includes engaging with stakeholders and vulnerable groups as part of the assessment process.

- ➔ **A.** The Company describes the process(es) it has in place to assess its human rights risks and impacts and discloses what it considers to be its salient human rights issues, covering its own operations.
- ➔ **B.** The Company describes the process(es) it has in place to assess its human rights risks and impacts in its supply chain.
- ➔ **C.** The Company publicly discloses the results of its human rights risks and impact assessments, which may be aggregated across its operations and locations.
- ➔ **D.** The Company describes how it involves affected stakeholders in its human rights risks and impact assessment process(es).

### B.4 Integrating and acting on humanrights risks and impact assessments

**Sources:** CHRB D03; UNGP 17, 19 and 24; UNGPRF C4; GRI 103-2

The Company integrates the findings of its assessments of human rights risks and impacts into relevant internal functions and processes in order to take appropriate actions to prevent, mitigate or remediate its salient human rights risks and impacts. This includes engaging with stakeholders and vulnerable groups on any action taken or to be taken.

- ➔ **A.** The Company describes its global system to prevent, mitigate or remediate its salient human rights issues in its own operations.
- ➔ **B.** The Company describes its global system to prevent, mitigate or remediate its salient human rights issues in its supply chain.
- ➔ **C.** The Company provides an example of the specific actions taken or to be taken on 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.
- ➔ **D.** The Company describes how it involves affected stakeholders in decisions about the actions to take in response to its salient human rights issues.

## B.5 Tracking the effectiveness of actions to respond to human rights risks and impacts

Sources: CHRB D04; UNGP 17, 20 and 24; UNGPRF C5; GRI 103-3

The Company tracks and evaluates the effectiveness of actions taken in response to its human rights risks and impacts and describes how it uses that information to improve processes and systems on an on-going basis. This includes engaging with stakeholders and vulnerable groups when evaluating the effectiveness of any action taken.

- ➔ **A.** The Company describes its system(s) for tracking or monitoring the actions taken in response to human rights risks and impacts and for evaluating whether the actions have been effective or have missed key issues or not produced the desired results.
- ➔ **B.** The Company provides an example of the lessons learned while tracking the effectiveness of its actions on at least one of its salient human rights issues as a result of its due diligence process(es).
- ➔ **C.** The Company describes how it involves affected stakeholders in evaluation(s) of whether the actions taken have been effective.

## B.6 Communicating on human rights impacts

Sources: CHRB D05; UNGP 20 and 21; UNGPRF C2

The Company communicates externally how it addresses its human rights impacts (i.e., throughout its due diligence process(es)) in a manner that is accessible to its intended audiences, especially affected stakeholders who have raised concerns, provides enough information to evaluate the adequacy of the response(s) and does not pose risks to affected stakeholders or personnel. Such communications should provide accurate, balanced and complete information. This type of communication is distinct from engagement with affected stakeholders for the purposes of assessing or addressing specific impacts.

- ➔ **A.** The Company provides an example demonstrating how it communicates with affected stakeholders regarding specific human rights issues raised by the stakeholders or on their behalf.
- ➔ **B.** The Company describes any challenge(s) to effective communication it has identified and how it is working to address them.

## Theme C. Remedies and Grievance Mechanisms

### C.1 Grievance channels/mechanisms to receive complaints or concerns from workers

Sources: CHRB E01; UNGP 22, 29 and 30; UNGPRF C6.1 and C6.3; GRI 103-2: ARP 7.1, 8.1 and 8.8

The Company has one or more mechanisms (its own, third party or shared) through which workers can raise complaints or concerns, including in relation to human rights issues. The mechanism(s) is available to all workers and takes into account accessibility by marginalised groups. The mechanism(s) is not used to undermine the role of legitimate trade unions (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law) in addressing labour-related disputes, nor precludes access to judicial or other non-judicial grievance mechanisms. UN Guiding Principle 31 provides relevant criteria for the design and operation of such mechanisms.

- ➔ **A.** The Company indicates that it has one or more mechanism(s), or participates in a third-party or shared mechanism, accessible to all workers to raise complaints or concerns related to the Company.
- ➔ **B.** The Company describes how it ensures the mechanism(s) is available in all appropriate languages and that workers are aware of it (e.g., specific communication(s)/training).
- ➔ **C.** The Company describes how it ensures workers in its supply chain have access to either: the Company's own mechanism(s) to raise complaints or concerns about human rights issues at the company's business relationships, or the company expects its business relationships to establish a mechanism(s) for their workers to raise such complaints or concerns.
- ➔ **D.** The Company expects its business relationships to convey the same expectation on access to grievance mechanism(s) to their own business relationships.

### C.2 Grievance mechanism(s) for external individuals and communities

Sources: CHRB E02; UNGP 22, 29 and 30; UNGPRF C6.1 and C6.3; GRI 103-2; ARP 7.1, 8.1 and 8.8

The Company has one or more mechanisms (its own, third party or shared) through which individuals and communities who may be adversely impacted by the Company can raise complaints or concerns, including in relation to human rights issues. The mechanism(s) is available to all external individuals and communities and takes into account accessibility by marginalised groups. The mechanism(s) does not preclude access to judicial or other non-judicial grievance mechanisms. UN Guiding Principle 31 provides relevant criteria for the design and operation of such mechanisms.

- ➔ **A.** The Company indicates that it has one or more mechanism(s), or participates in a shared mechanism, accessible to all external individuals and communities who may be adversely impacted by the Company, or those acting on their behalf, to raise complaints or concerns.
- ➔ **B.** The Company describes how it ensures the mechanism(s) is available in local languages and that all affected external stakeholders at its own operations are aware of it (e.g., specific communication(s)/training).

- ➔ **C.** The Company describes how it ensures external individuals and communities have access to either: the company's own mechanism(s) to raise complaints or concerns about human rights issues at the company's business relationships, or the company expects its business relationships to establish a mechanism for external individuals and communities to raise such complaints or concerns.
- ➔ **D.** The Company expects its business relationships to convey the same expectation on access to grievance mechanism(s) to their own business relationships.

## C.7 Remediating adverse impacts

**Sources:** CHRB E07; UNGP 19, 22 & 31; UNGPRF C6, C6.4 & C6.5; GRI 103-2 & 413-2; ARP 12.2 & 13.1

The Company provides for or cooperates in remediation to victims where it has identified that it has caused or contributed to adverse human rights impacts (or others have brought such information to the Company's attention, such as through its grievance mechanism(s)). It also incorporates changes to systems, processes (e.g., human rights due diligence processes) and practices to prevent similar adverse impacts in the future.

- ➔ **A.** For adverse human rights impacts which it has caused or to which it has contributed, the Company describes the approach it took to provide or enable a timely remedy for victims **OR** if no adverse impacts have been identified then the Company describes the approach it would take to provide or enable timely remedy for victims.
- ➔ **B.** For adverse human rights impacts which it has caused or to which it has contributed, the Company also describes changes to systems, processes and practices to prevent similar adverse impacts in the future.
- ➔ **C.** The Company describes its approach to monitoring implementation of the agreed remedy.

## 2. Salient Human Rights Risks Indicators

This section covers salient human rights issues for the wind and solar energy sectors. Each indicator covers actions companies can take to address the issues. These actions are differentiated by the type of Company assessed for clarity where relevant.

### Cause, contribute and directly linked

The three main levels of participation that determine the appropriate range of actions businesses can take according to the UN Guiding Principles on Business and Human Rights are the following, noting that businesses may move along this continuum:

- ➔ **Cause:** “[W]here a business enterprise causes or may cause an adverse human rights impact, it should take the necessary steps to cease or prevent the impact.”
- ➔ **Contribute:** “Where a business enterprise contributes or may contribute to an adverse human rights impact, it should take the necessary steps to cease or prevent its contribution and use its leverage to mitigate any remaining impact to the greatest extent possible...”
- ➔ **Directly linked:** “Where a business enterprise has not contributed to an adverse human rights impact, but that impact is nevertheless directly linked to its operations, products or services by its business relationship with another entity, the situation is more complex...The more complex the situation and its implications for human rights, the stronger is the case for the enterprise to draw on independent expert advice in deciding how to respond.”

The interpretation of these terms has been the subject of debate with notable inputs by the OHCHR, the OECD and Shift.

### Summary of salient human rights risks indicators

- ➔ Indigenous Peoples’ and Affected Communities’ Rights (D1, D2, D3)
- ➔ Land and resource rights (E1, E2, E3)
- ➔ Security & conflict-affected areas (F1, F2)
- ➔ Responsible mineral sourcing (G1, G2, G3)
- ➔ Human rights & environmental defenders (H1)
- ➔ Labour rights incl. forced labour (I1, I2, I3, I4, I5)
- ➔ Right to a Healthy and Clean Environment (J1, J2)
- ➔ Transparency and Anti-Corruption (K1, K2)
- ➔ Equality & Inclusion (L1, L2, L3)
- ➔ Just transition (JT1, JT2, JT3, JT4, JT5, JT6)

## Overview of key salient human rights risks by operational stage

| Operational stages                            | Salient human rights issues (indicator ID)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Raw material sourcing</b>                  | <ul style="list-style-type: none"> <li>➔ Indigenous Peoples' and Affected Communities' Rights (D1, D2, D3, D4)</li> <li>➔ Land and resource rights (E1, E2)</li> <li>➔ Security &amp; conflict-affected areas (F1, F2)</li> <li>➔ Responsible mineral sourcing (G1, G2, G3)</li> <li>➔ Human rights &amp; environmental defenders (H1)</li> <li>➔ Labour rights incl. forced labour (I1, I2, I3, I4, I5, I6)</li> <li>➔ Right to a Healthy and Clean Environment (J1)</li> <li>➔ Transparency and Anti-Corruption (K1, K2)</li> <li>➔ Equality &amp; Inclusion (L1, L2, L3)</li> </ul> |
| <b>Processing of minerals</b>                 | <ul style="list-style-type: none"> <li>➔ Land and resource rights (E1, E2)</li> <li>➔ Security &amp; conflict-affected areas (F1, F2)</li> <li>➔ Responsible mineral sourcing (G1, G2, G3)</li> <li>➔ Human rights &amp; environmental defenders (H1)</li> <li>➔ Labour rights incl. forced labour (I1, I2, I3, I4, I5, I6)</li> <li>➔ Right to a Healthy and Clean Environment (J2)</li> <li>➔ Transparency and Anti-Corruption (K1, K2)</li> <li>➔ Equality &amp; Inclusion (L1, L2, L3)</li> </ul>                                                                                  |
| <b>Solar wafer/panel assembly</b>             | <ul style="list-style-type: none"> <li>➔ Responsible mineral sourcing (G1, G2, G3)</li> <li>➔ Labour rights incl. forced labour (I1, I2, I3, I4, I5, I6)</li> <li>➔ Right to a Healthy and Clean Environment (J2)</li> <li>➔ Transparency and Anti-Corruption (K1, K2)</li> <li>➔ Equality &amp; Inclusion (L1, L2, L3)</li> </ul>                                                                                                                                                                                                                                                     |
| <b>Wind turbine/solar panel manufacturing</b> | <ul style="list-style-type: none"> <li>➔ Responsible mineral sourcing (G1, G2, G3)</li> <li>➔ Labour rights incl. forced labour (I1, I2, I3, I4, I5, I6)</li> <li>➔ Right to a Healthy and Clean Environment (J2)</li> <li>➔ Transparency and Anti-Corruption (K1, K2)</li> <li>➔ Equality &amp; Inclusion (L1, L2, L3)</li> </ul>                                                                                                                                                                                                                                                     |

**Operational stages    Salient human rights issues (indicator ID)**

---

- Project siting**
- ➔ Indigenous Peoples’ and Affected Communities’ Rights (D1, D2, D3, D4)
  - ➔ Land and resource rights (E1, E2)
  - ➔ Security & conflict-affected areas (F1, F2)
  - ➔ Human rights & environmental defenders (G1)
  - ➔ Right to a Healthy and Clean Environment (I1)
  - ➔ Transparency and Anti-Corruption (J1, J2)
- 

- Construction**
- ➔ Indigenous Peoples’ and Affected Communities’ Rights (D2)
  - ➔ Security & conflict-affected areas (F1, F2)
  - ➔ Human rights & environmental defenders (H1)
  - ➔ Labour rights incl. forced labour (I1, I2, I3, I4, I5, I6)
  - ➔ Right to a Healthy and Clean Environment (J1)
  - ➔ Transparency and Anti-Corruption (K1, K2)
  - ➔ Equality & Inclusion (L1, L2, L3)
- 

- Operation and maintenance**
- ➔ Indigenous Peoples’ and Affected Communities’ Rights (D2, D3)
  - ➔ Security & conflict-affected areas (F1, F2)
  - ➔ Human rights & environmental defenders (H1)
  - ➔ Labour rights incl. forced labour (I1, I2, I3, I4, I5, I6)
  - ➔ Right to a Healthy and Clean Environment (J1)
  - ➔ Transparency and Anti-Corruption (K1, K2)
  - ➔ Equality & Inclusion (L1, L2, L3)
- 

- Balance of plant**
- ➔ Security & conflict-affected areas, incl. responsible mineral sourcing (F1, F2, F3, F4, F5)
  - ➔ Human rights & environmental defenders (H1)
  - ➔ Labour rights incl. forced labour (I1, I2, I3, I4, I5, I6)
- 

- Decommissioning**
- ➔ Right to a Healthy and Clean Environment (J2)
-

## Theme D. Indigenous Peoples' and Affected Communities' Rights

### D.1 Commitment to respect Indigenous Peoples' rights, including free, prior and informed consent

**Sources:** UN Declaration on the Rights of Indigenous Peoples, ILO Convention 169, UNGP 12; UNGPRF A1.2; IFC PS 7; GRI 411-1; GRI 103; CHRB F19

The Company commits to respect Indigenous Peoples' rights and describes how that commitment is implemented in practice.

#### Project developers

- ➔ **A.** The Company has a policy commitment 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.
- ➔ **B.** The Company describes 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.
- ➔ **C.** The Company indicates it is committed to free prior and informed consent (FPIC) 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.
- ➔ **D.** The Company provides the most recent example where it has obtained FPIC or where it decided not to pursue activities impacting on Indigenous Peoples, where their free, prior and informed consent was not forthcoming.

#### Wind turbine & solar panel manufacturers<sup>7</sup>

- ➔ **A.** The Company expects business partners in its value chain (at minimum project developer clients developer clients) to have a policy commitment to respect Indigenous Peoples' rights in line with international law and standards (in downstream due diligence processes for clients, business partner code of conduct or other relevant practices).
- ➔ **B.** The Company demonstrates it is committed to only working with business partners in its value chain that respect free prior and informed consent (FPIC) in line with international human rights law including UNDRIP.

**Note:** This can be demonstrated in practice over time, for example, by working with business partners on ensuring respect of FPIC and gradually increasing threshold/criteria for clients in downstream due diligence processes and/or for suppliers in contracts or supplier codes of conduct.

## D.2 Engagement with all affected communities

**Source:** UNGP 18 & 21; UNGPRF C2 & C2.1; GRI 102-42, GRI 102-43, GRI 102-44; CHR B 1.8

The Company has an approach to engaging with communities affected by its activities on a regular basis. In doing so, it identifies affected communities and engages in regular dialogue on human rights issues with them and their legitimate representatives. It also pays particular attention to those at heightened risk of vulnerability or marginalisation and prohibits bribes or other favours that may divide communities. To facilitate informed engagement, the Company provides meaningful information in accessible formats and languages.

**Note:** For manufacturers, this criterion is looking for a process to engage with communities on potential impacts related to the operational phase of the project the manufacturer is involved in (i.e.: impacts of the construction, operation/maintenance on communities for example). While manufacturers may not have direct involvement in undertaking consultations with communities at the project siting stage, they can use their leverage through downstream human rights due diligence practices to ensure the projects they supply have undertaken these in line with international best practice.

### Project developers

- ➔ **A.** The Company describes how it has identified, and engaged with affected communities, in the last two years.
- ➔ **B.** The Company provides at least two examples of its engagement with communities whose human rights have been or may be affected by its activities in the last two years.
- ➔ **C.** The examples include a description of how affected communities were identified, how consultations took place, if and how traditionally marginalised groups were included (for example, women, Indigenous Peoples, afro-descendants, religious minorities, people with disabilities, LGBTQA+, children).
- ➔ **D.** The company meets requirements in B2.C, B3.D, B4.D and B5.C.

### Wind turbine & solar panel manufacturers<sup>8</sup>

- ➔ **A.** The Company describes how it has identified, and engaged with affected communities, in the last two years on potential impacts related to the operational phase of the project the manufacturer is involved in (i.e.: impacts of the construction, operation/maintenance on communities for example).
- ➔ **B.** The Company provides at least two examples of its engagement with communities whose human rights have been or may be affected by its activities in the last two years.
- ➔ **C.** The examples include a description of how affected communities were identified, how consultations took place, if and how traditionally marginalised groups were included (for example, women, Indigenous Peoples, afro-descendants, religious minorities, people with disabilities, LGBTQA+, children).
- ➔ **D.** The company meets requirements in B2.C, B3.D, B4.D and B5.C.

### D.3 Benefit and ownership sharing policy

Source: [Right Energy Partnership](#), [IRENA](#), [Mapping the Renewable Energy Sector to the SDGs: An Atlas](#), Exploring Shared Prosperity: Indigenous leadership and partnerships for a just transition (BHRR)

The Company discloses its process for engaging with affected communities for identifying benefit and ownership sharing opportunities, and reports on the implementation of that process.

#### Project developers

- ➔ **A.** The Company has a public commitment to identify potential benefit and ownership sharing options with affected communities and Indigenous Peoples. This includes a commitment to explore co-ownership models.
- ➔ **B.** This commitment recognises that affected communities have a right to decide their own priorities in terms of how they may benefit from projects.
- ➔ **C.** The Company discloses statistics for each of its projects and/or operations describing the demographics of its benefits and ownership sharing processes, including any final agreements, percentage of revenue of projects and/or equity shares paid to local communities and Indigenous Peoples.
- ➔ **D.** The Company also discloses how members of affected communities participated in the decision-making.

#### Wind turbine & solar panel manufacturers

- ➔ **A.** The Company rewards/incentivises relevant businesses in its value chain (i.e.: project developer clients) for having a commitment to identify potential benefit and ownership sharing options that serve affected communities and Indigenous Peoples. The policy can take the form of incentives such as rebates, better contractual terms, etc.
- ➔ **B.** The Company rewards/incentivises relevant businesses in its value chain (i.e.: project developer clients) for disclosing statistics for each of its projects and/or operations describing the demographics of its benefits and ownership sharing processes, including any final agreements, percentage of revenue of projects and/or equity shares paid to local communities and Indigenous Peoples, and how members of affected communities participated in the decision-making. This can take the form of incentives such as rebates, better contractual terms, etc.

## D.4 Local wind & solar energy access, affordability

Source: SDGs Goal 7, SEforAll, [IRENA, Mapping the Renewable Energy Sector to the SDGs: An Atlas](#)

The Company contributes to the goal of ensuring “access to affordable, reliable and modern energy for all by 2030” including by facilitating access to its renewable energy sources for communities where projects are developed.

### Project developers

- ➔ **A.** The Company discloses its actions to support access and affordability of renewable energy in the communities in which it operates including but not limited to supporting local energy initiatives, facilitating mini grids and/or stand-alone system, connections to grid infrastructure, knowledge sharing with governments, communities and civil society about electrification initiatives, etc.
- ➔ **B.** The Company publishes a timebound actions plan and reporting on targets developed in consultation with communities including marginalised groups at heightened risk of energy poverty.
- ➔ **C.** The Company publicly supports government policies and actions to address energy access challenges (including but not limited to affordability of electricity, grid electrification, mini grids, etc).

### Wind turbine & solar panel manufacturers

- ➔ **A.** The Company discloses its actions to support access and affordability of renewable energy in the communities affected by the projects it supplies including but not limited to supporting local energy initiatives, facilitating mini grids and/or connections to grid infrastructure, knowledge sharing with governments, communities and civil society about electrification initiatives, etc.
- ➔ **B.** The Company publishes a timebound actions plan and reporting on targets developed in consultation with communities including marginalised groups at heightened risk of energy poverty.
- ➔ **C.** The Company publicly supports government policies and actions to address energy access challenges (including but not limited to affordability of electricity, grid electrification, mini grids, etc).

# Theme E. Land and Resource Rights

## E.1 Respect for land and natural resource tenure rights

**Source:** Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests, IFC PS 5; Interlaken Group 2015; CHRB Extractives A.1.3.a, CHRB F17; EO100 Standard

The Company commits to respect ownership/use of land and natural resources and respect legitimate tenure rights related to the ownership and use of land and natural resources.

### Project developers

- ➔ **A.** The Company has a policy commitment to respecting land rights of legitimate tenure rights holders, including where land and ownership rights are customary and/or not formally recorded.
- ➔ **B.** When acquiring, leasing or making other arrangements to use (or restrict the use of) land and/or resources in its own operations, the Company discloses how it identifies legitimate tenure rights holders, with particular attention to vulnerable tenure rights holders.  
~~The Company also discloses the locations of its projects including number or percentage of projects in urban, rural or natural areas.~~
- ➔ **C.** The Company's policy extends these expectations to all relevant parts of its value chain including suppliers, contractors, subcontractors, and other business relationships.
- ➔ **D.** When land rights are contested in a project or business relationship the Company is involved in, the Company discloses the steps it has taken to use its leverage to work towards a resolution in line with international standards.

### Wind turbine & solar panel manufacturers<sup>9</sup>

- ➔ **A.** The Company expects business partners in its value chain (project developer clients) to have a policy commitment to respecting land rights of legitimate tenure rights holders, including where land and ownership rights are customary and/or not formally recorded (including via contractual agreements with suppliers, supplier code of conduct or other relevant practices).
- ➔ **B.** When land rights are contested in a project or business relationship the Company is involved in (i.e.: impacts of the construction, operation/maintenance on communities for example), the Company discloses the steps it has taken to use its leverage to work towards a resolution in line with international standards.

## E.2 Just and fair physical and economic displacement policy implementation

Source: IFC Performance Standard 5 & 7, Interlaken Group 2015; CHRB F17, EO100 Standard

The Company uses physical and economic displacement as a matter of last resort, following IFC Performance Standard 5. The Company tracks the impacts of its physical and economic displacement policies and practices.

### Project developers

- ➔ **A.** The Company has a public commitment to follow IFC Performance Standard 5 when physical and economic displacement for a project is determined to be necessary, and only as a last resort measure.
- ➔ **B.** For any new or on-going land resettlements, the company describes how it provides financial compensation or other compensation alternatives, including its valuation methods and how legitimate tenure rights holders were involved in determining the valuation.
- ➔ **C.** The Company publishes statistics regarding the number of people relocated by current and planned projects it is involved in.
- ➔ **D.** The Company publishes regular (at least annually, throughout the life of the project) reviews of living conditions of relocated communities in scenarios where housing or other related compensation agreements were made **OR** if the Company has not engaged in any projects involving physical and economic displacements, it describes its approach in relation to all elements above.

### Wind turbine & solar panel manufacturers<sup>10</sup>

- ➔ **A.** The Company expects relevant business partners in its value chain (project developer clients) to commit to follow IFC Performance Standard 5 when physical and economic displacement for a project is determined to be necessary, and only as a last resort measure.
- ➔ **B.** When the implementation of just and fair economic displacement policies are contested in a project or business relationship the Company is involved in (impacts of the construction, operation/maintenance on communities for example), the Company discloses the steps it has taken to use its leverage to work towards a resolution in line with international standards.

## Theme F. Security and Conflict-Affected areas

### F.1 Operating in or sourcing from conflict-affected areas

Source: UN Working Group on business and human rights report on conflict-affected regions

The Company acknowledges the increased risks associated with operating in or sourcing materials from conflict-affected and high-risk areas, and reports on any identified risks in its own operations or business relationships in these contexts in line with the recommendations of the UN Working Group on business and human rights.<sup>11</sup>

- ➔ **A.** The Company explicitly commits to address the heightened human rights risks associated with operations in or sourcing from conflict-affected and/or high-risk area.
- ➔ **B.** The Company outlines the steps it takes to assess and mitigate these risks with a conflict-sensitive lens (or references where this information can be found in the Company's human rights due diligence policy).
- ➔ **C.** The Company describes how it engages with stakeholders as part of its process to mitigate risks when operating in or sourcing from conflict-affected and/or high-risk areas region.

### F.2 Security providers & human rights

Source: Voluntary Principles on Security and Human Rights, International Code of Conduct for Private Security Providers, EO100 Standard

The Company discloses information about the implementation of its risk assessment processes with regards to the use of security forces and arrangements and integrates a commitment to only engaging with private security forces that are held to international standards.

- ➔ **A.** The Company describes how it implements its security approach and provides 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.
- ➔ **B.** The Company describes how it ensures its business partners, including joint ventures, implement an equivalent approach to security management that ensures respect for human rights.
- ➔ **C.** The Company provides evidence that its security and human rights assessments include inputs from the local community, including about their security concerns.
- ➔ **D.** The Company provides at least one example of working with community members to improve security or prevent or address tensions related to its operations.

## Theme G. Responsible mineral sourcing

### G.1 Responsible sourcing of minerals: arrangements with suppliers

**Source:** CHRB A06 and F21, OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, KnowTheChain

The Company has a management system for the responsible sourcing of raw materials to support supply chain due diligence aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the OECD Guidance) to identify and manage risks of contributing to or being directly linked to significant adverse impacts. This includes requirements for suppliers.

#### Project developers

- ➔ **A.** The Company has a responsible sourcing policy statement committing it to follow the OECD Guidance.
- ➔ **B.** The policy explicitly covers all minerals
- ➔ **C.** The company has a publicly available policy statement that expects its business relationships to require their business relationships to follow the OECD Guidance.
- ➔ **D.** The Company indicates that it incorporates into commercial contracts/written agreements with business relationships requirements to conduct due diligence in accordance with the OECD Guidance.

#### Wind turbine & solar panel manufacturers

- ➔ **A.** The Company has a responsible sourcing policy statement committing it to follow the OECD Guidance.
- ➔ **B.** The policy explicitly covers all minerals.
- ➔ **C.** The company has a publicly available policy statement that expects its business relationships to require their business relationships to follow the OECD Guidance.
- ➔ **D.** The Company indicates that it incorporates into commercial contracts/written agreements with smelters and refiners and business relationships requirements to conduct due diligence in accordance with the OECD Guidance.

## G.2 Responsible sourcing of minerals: mapping and disclosing the supply chain

Source: CHRB C09

**Note:** For specific indicators on solar panels supply chain transparency, see serious allegations section.

### Project developers

- ➔ **A.** The Company indicates that it identifies and maps its suppliers, including direct and indirect suppliers.
- ➔ **B.** The Company indicates that it has a traceability system in place for its mineral supply chains.
- ➔ **C.** The Company discloses the names and specific locations of the direct and indirect suppliers who make up the most significant parts of its supply chain and explains how it has defined what are the most significant parts of its supply chain.
- ➔ **D.** The Company discloses which direct or indirect suppliers it considers to be involved in higher risk activities, geographies and products.

### Wind turbine & solar panel manufacturers

- ➔ **A.** The Company indicates that it identifies and maps its suppliers, including direct and indirect suppliers.
- ➔ **B.** The Company indicates that it has a traceability system in place for its mineral supply chains.
- ➔ **C.** The Company discloses the names and specific locations of the direct and indirect suppliers who make up the most significant parts of its supply chain (including smelters and refiners) and explains how it has defined what are the most significant parts of its supply chain.
- ➔ **D.** The Company discloses which direct or indirect suppliers it considers to be involved in higher risk activities, geographies and products.

### G.3 Responsible sourcing of minerals: risk identification in mineral supply chains

**Source:** CHRB F22; OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

The Company actively identifies and assesses risks and impacts in its mineral supply chain, including approaches to focus its risk assessments on those minerals and suppliers that raise red flags as identified in the OECD Guidance.

#### Project developers

- ➔ **A.** The Company describes its processes for identifying and prioritising risks and impacts in its supply chain as set out in the OECD Guidance and discloses the risks identified.
- ➔ **B.** The Company expects suppliers (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.
- ➔ **C.** The Company indicates that the risk identification processes and disclosures cover minerals assessed as highest risk.

#### Wind turbine & solar panel manufacturers

- ➔ **A.** The Company describes its processes for identifying and prioritising risks and impacts in its supply chain as set out in the OECD Guidance and discloses the risks identified.
- ➔ **B.** The Company describes its processes to identify the smelters/refiners in its supply chain and assess whether the smelters/refiners have carried out due diligence processes in accordance with the OECD Guidance.
- ➔ **C.** The Company also publicly discloses the list of all the qualified smelters/refiners in its supply chain that it has independently judged to conform to the due diligence processes set out in the OECD Guidance.
- ➔ **D.** The Company indicates that the risk identification processes and disclosures cover minerals assessed as highest risk.

## Theme H. Protection of Human Rights and Environmental Defenders

### H.1 Commitment to respect the rights of human rights and environmental defenders

Source: CHRB A.09, UNGP 12, UNGPRF A.1.2, UN Working Group Guidance on HRDs

The Company publicly commits to not tolerating threats, intimidation, violence, punitive action, surveillance or physical or legal attacks against human rights defenders, including those exercising their rights to freedom of expression, association, peaceful assembly and protest against the business or its operations. This includes avoiding the use of SLAPPs (Strategic Litigation Against Public Participation) and placing equivalent expectations on its business relationships. The Company also commits to engaging with human rights defenders as part of operational processes of risk assessment and due diligence and supporting the work of human rights defenders to create a safe and enabling environment for the work of civil society in locations where it operates, at both local and national levels.

**Note:** The term ‘human rights defender’ is a broad and inclusive definition that refers to individuals or groups that, in their personal or professional capacity and in a peaceful manner, strive to protect and promote human rights. This includes, but is not limited to, affected communities, nongovernmental organisations and individuals, members of the media, lawyers, judges, academics, government officials and civil servants or members of the private sector (including Company employees such as trade unionists and whistle-blowers).

- ➔ **A.** The Company commits to neither tolerate nor contribute to threats, intimidation and attacks (both physical and legal) against human rights defenders.
- ➔ **B.** The Company expects business partners in its value chain to make this commitment.
- ➔ **C.** The Company describes how it engages with human rights defenders as part of operational processes of risk assessment and due diligence.
- ➔ **D.** The Company describes how it works with human rights defenders to create safe and enabling environments for civic engagement and human rights at local, national or international levels.

# Theme I. Labour rights (including protection against forced labour)

## I.0 Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work

**Source:** CHRB A02; UNGP 12 and 16(c), UNGPRF, A1; FLA Code of Conduct; GRI 103-2

**Note:** This indicator is replicated in the forced labour section for clarity, but is assessed as part of the CHRB core indicators as A.2

The Company publicly commits to respecting the principles concerning fundamental rights at work in the eight ILO core conventions as set out in the Declaration on Fundamental Principles and Rights at Work. It also has a publicly available statement of policy committing it to respect the human rights of workers in its business relationships.

- ➔ **A.** The Company has a publicly available policy statement committing it to respect the human rights that the ILO has declared to be fundamental rights at work.
- ➔ **B.** The Company has a publicly available policy statement that expects its business relationships to commit to respecting the human rights that the ILO has declared to be fundamental rights at work.

## I.1 Health and safety

**Source:** CHRB F09; F10; CHRB health and safety performance indicators in automotive and extractives benchmarks

The Company discloses key data regarding its health and safety performance.

- ➔ **A.** The Company describes the process(es) it has in place to identify its health and safety risks and impacts.
- ➔ **B.** The Company discloses quantitative information on health and safety for its workers related to injury rates or lost days (or near miss frequency rate) and fatalities.
- ➔ **C.** The Company extends this expectation to all relevant suppliers, contractors, subcontractors, and other business relationships.
- ➔ **D.** The Company has set targets related to injury rates or lost days (or near miss frequency rate) and fatalities for the last reporting period. The Company has met those targets or provides an explanation of why these were not met or how it works to improve its health and safety management systems.

## 1.2 Forced labour risk management

**Source:** ILO Forced Labor Convention, Fair Labor Association Code of Conduct and Compliance Benchmarks, ILO Forced Labor Convention, UNGP 16, UNGP 19 Commentary, KnowTheChain

The Company has established clear responsibilities and accountability for the implementation of its supply chain policies that address forced labour, both within the Company and at the board level.

- ➔ **A.** The Company has tasked a board member or board committee with oversight of its supply chain policies that address forced labour, and describes how the experiences of affected workers, rights-holders or relevant stakeholders (such as civil society, unions, and workers or their representatives) informed board discussions.
- ➔ **B.** 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 and/or trains suppliers below the first tier on such policies, and measures the effectiveness of capacity building.
- ➔ **C.** The Company also discloses its own ongoing efforts to prevent and mitigate forced labour in its operations and supply chain including by using and increasing its leverage (for example through capacity building, collaboration with others, public statement of expectations).
- ➔ **D.** The Company explains 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.

## 1.3 Prohibition of forced labour: wage & recruitment practices

**Source:** CHRB F05, F06; Fair Labor Association Code of Conduct and Compliance Benchmarks IV.F.2.3 and IV.F.12, KnowTheChain methodology

The Company requires that workers, in its own operations and in suppliers' operations, are paid in full and on time in a recognised currency, and that their wages are not withheld. In alignment with the ILO definition of recruitment fees and related costs, the Company requires no worker in its supply chains is charged recruitment fees pay for a job – the costs of recruitment-related fees should be borne not by the worker but by the employer (Employer Pays Principle).

- ➔ **A.** The Company has a publicly available policy requiring no job seekers and workers, in own operations or supply chains, should pay any recruitment fees or related costs to secure a job (Employer Pays Principle) and commits to fully reimburse them if they have been required to pay any fees or related costs during recruitment.
- ➔ **B.** In its contractual arrangements with suppliers or supplier code of conduct, the Company requires suppliers to pay workers directly, in full and on time. The Company provides its assessment of the number affected by failure to pay directly, in full and on time in its supply chain.
- ➔ **C.** The Company describes how it works with its supply chain to pay workers regularly, in full and on time.
- ➔ **D.** The Company also describes how it implements and monitors this practice, particularly with employment agencies/labour brokers/recruitment intermediaries.

## I.4 Prohibition of forced labour: restrictions on workers

**Source:** CHRB F05, F06 (ICCPR, Art. 12; ILO, No. 29 & No. 105; ILO 2019; HRIB 8.2.6; ETI 1.2; FLA IV.F.4, IV.F.5, IV.F.6, IV.F.9 and IV.F.10; SA8000; GRI 409-1; SA8000 IV.2.4)

The Company requires that its own operations and suppliers do not restrict workers' mobility, including through the retention of passports, other personal identification or travel documents or bank payment cards or similar arrangements workers use for accessing wages. The supplier also refrains from requiring workers to use Company provided accommodation.

- ④ **A.** In its own operations and contractual arrangements with suppliers or supplier code of conduct the Company prohibits retaining workers' personal documents or restricting workers' freedom of movement or requiring workers to use Company provided accommodation.
- ④ **B.** The Company describes how it works with its supply chain including contractors and business relationships to eliminate retention of workers' documents or other actions to physically restrict movement.
- ④ **C.** The Company also describes how it implements and monitors this practice, particularly with employment agencies/labour brokers/recruitment intermediaries.

## I.5 Freedom of association and collective bargaining

**Source:** CHRB F07, 08 (ICESCR, Art. 7, ICCPR, Art. 22; ILO, No. 87 & No. 98; HRIB 2.6; ETI, 2; FLA VI.FOA.1, VI.FOA.3 and VI.FOA.4; FWF, 4; SA8000; GRI 407- 1; SA8000 IV.4)

The Company requires that its suppliers respect the right of all workers 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) and to bargain collectively. In addition, the Company requires that its suppliers provide workers' representatives with appropriate facilities to assist in the development of effective collective bargaining agreement(s). The Company also requires that its suppliers prohibit intimidation, harassment, retaliation and violence against trade union members and trade union representatives.

- ④ **A.** In its own operations as well as in contractual arrangements with its suppliers or supplier code of conduct, the Company requires respect for the right of all workers 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) and to bargain collectively and puts in place 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).
- ④ **B.** The Company describes how it works to support the practices of its suppliers in relation to freedom of association and collective bargaining.
- ④ **C.** The Company discloses the proportion of its total direct operations workforce covered by collective bargaining agreements; and its assessment of the number affected by restrictions to freedom of association or collective bargaining in its supply chain.
- ④ **D.** The Company has entered into a Global Framework Agreement with a global trade union federation (credited where there is confirmation from both parties that an agreement is finalised).

## 1.6 Living wage (in own operations and supply chains)

**Source:** CHRB F01, F02 (ICESCR, Art. 7, HRIB, 8.2.3, ETI, 5; FWF, 5; SA8000; GLWC; SA8000, IV.8.1), CHRB extractives D.3.1 (ICESCR, Art. 7; HRIB, 2.4.1, ETI, 5; SA8000; GLWC; SA8000, IV.8.1)

The Company commits to paying all its employees a living wage and extends this requirement to all relevant business partners.

- ➔ **A.** The Company describes its process to determine a living wage for the locations where it operates, which is periodically reviewed, including with relevant trade unions (or equivalent worker bodies where the rights to freedom of association and collective bargaining are restricted under law).
- ➔ **B.** The Company includes requirements to pay workers a living wage in its contractual arrangements with business relationships and suppliers (this can be via the supplier code of conduct).
- ➔ **C.** The Company discloses evidence of activities to further the payment of living wages by its business relationships.

## Theme J. Right to a Healthy and Clean Environment

### J.1 Environmental impact assessment and remediation

**Source:** United Nations General Assembly resolution 76/300, Espoo Convention, EU Environmental Impact Assessment Directive, [IFC Cumulative Impact Good Practice Handbook](#)

The Company conducts and publishes environmental impact assessments for all its renewable energy projects, including specific information on potential harms and plans for mitigation.

**Note:** In the 2023 assessment, companies were awarded partial points for undertaking environmental impact assessments even if they did not make it clear whether and how these include cumulative impacts. In future assessments, companies will be expected to demonstrate or explain under what circumstances it undertakes cumulative impact assessments for its renewable energy projects.

#### Project developers

- ➔ **A.** The Company undertakes environmental impact assessments for its renewable energy projects.
- ➔ **B.** The Company publishes environmental impact assessments.
- ➔ **C.** The Company explains under what circumstances it undertakes cumulative impact assessments for its renewable energy projects.

#### Wind turbine & solar panel manufacturers

- ➔ **A.** The Company expects business partners to undertake environmental impact assessments (ie: via code of conduct, downstream due diligence process or similar).
- ➔ **B.** The Company expects business partners to publish environmental impact assessments.
- ➔ **C.** The Company expects business partners to explain under what circumstances they undertake cumulative impact assessments for its renewable energy projects

## J.2 Life cycle assessment

Source: ISO 14040/14044

The Company analyses and reports on and the life cycle assessments of the primary technologies it uses, including raw materials sourcing and waste generation as per ISO 14040/14044.

### Project developers

- ➔ **A.** The Company expects its suppliers (at minimum wind turbine and/or solar panel manufacturers) to undertake regular public life cycle assessments of its primary technologies.
- ➔ **B.** The Company expects suppliers to have action plans in place to address potential adverse impacts identified during life cycle assessments with regular progress reporting.

### Wind turbine & solar panel manufacturers

- ➔ **A.** The Company undertakes regular public life cycle assessments of its primary technologies such as solar panels or wind turbines.
- ➔ **B.** The Company demonstrates and continually reports (at least annually) on action plans to address potential adverse impacts identified during life cycle assessments.

## Theme K. Transparency and Anti-Corruption

### K.1 Anti-corruption due diligence and reporting

Source: OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, OECD Convention on Combatting Bribery of Foreign Public Officials, EITI

The Company adopts internationally recognized standards for prohibiting and addressing bribery and corruption, and reports on alleged instances of corruption as part of its reporting on grievance mechanism use and implementation.

- ➔ **A.** The Company commits not to engage in any active or passive act of bribery and corruption of public officials or employees of business relationships, or their relatives and associates, directly or through business intermediaries;
- ➔ **B.** The Company extends this expectation to all relevant suppliers, contractors, subcontractors, and other business relationships.
- ➔ **C.** The Company reports information regarding any corruption or bribery complaints or concerns received via its grievance mechanism/channels for internal and external individuals and communities (see C.2).  
OR If no corruption reports were made on this platform the Company notes that.

## K.2 Payments to governments & contract transparency

Source: EITI Standard, EITI Guidance note on contracts and licenses, GRI 207-4

The Company discloses project-level information on payments-to-governments, and its full tax Country-by-Country report (CbCR) in line with GRI 207-4, and it discloses its contracts and/or agreements with governments. Manufacturers disclose their full tax CbCR or expects clients to publish payments to governments information, and either disclose contracts or expect clients to disclose them.

### Project developers

- ➔ **A.** The Company publishes a Country-by-country tax report (CbCR), in line with GRI Standard 207-4, at group level when applicable.
- ➔ **B.** The Company discloses payments it made to governments at project-level including for purchase or rent of land or natural resources related to its renewable energy projects.
- ➔ **C.** The Company publicly declares support for governments to publicly disclose contracts and licenses that govern renewable energy projects in line with the EITI Standard and related guidance note.
- ➔ **D.** The Company discloses the terms, contracts and/or agreements under which those payments were made, including all annexes.

### Wind turbine & solar panel manufacturers

- ➔ **A.** The Company publishes a Country-by-country tax report (CbCR), in line with GRI Standard 207-4, at group level when applicable.
- ➔ **B.** The Company expects project developer clients to disclose the payments they made to governments at project-level including for purchase or rent of land or natural resources related to its renewable energy projects.
- ➔ **C.** The Company publicly declares support for governments to publicly disclose contracts and licenses that govern renewable energy projects in line with the EITI Standard and related guidance note.
- ➔ **D.** The Company discloses the terms, contracts and/or agreements under which those payments were made, including all annexes.  
**OR** If the Company is not involved in direct payments to governments, it expects its relevant business relationships to disclose this information.

## Theme L. Diversity, Equality and Inclusion

### L.1 Diversity, equality & inclusion training for management and employees

Source: ILO Convention 190 (Convention on the Elimination of All Forms of Racial Discrimination)

The Company conducts regular equality training for both management and staff and extends this expectation to relevant business partners.

- ➔ A. The Company provides mandatory and regular (at least annual) in person, virtual, and/or written training, as per ILO Convention 190, to its staff on all types of contracts on equality, equity, diversity, anti-discrimination.
- ➔ B. The trainings include gender-based violence and the Company's policies and mechanisms for addressing it.
- ➔ C. The Company requires its suppliers to provide trainings on equality, equity, diversity, anti-discrimination.
- ➔ D. The Company provides materials and access to relevant resources for those who will be conducting trainings.

### L.2 Gender balance and sensitivity

Source: WBA gender benchmark, Equileap, UN Women's Empowerment Principles

The Company commits to and demonstrates progress towards gender sensitive approaches in its human rights policies and practices.

- ➔ A. The Company commits to and adopts a timebound action plan to integrate a gender lens to human rights policies and practices including its human rights due diligence process, risk management and remedy.
- ➔ B. The Company demonstrates progress against its action plan through regular (at least annual) reporting.
- ➔ C. The Company discloses information that shows women and non-binary people make up at least 40% of the Company's executives.
- ➔ D. The Company discloses information that shows women and non-binary people make up at least 40% of the Company's board of directors.

### L.3 Gender wage gap reporting

Source: WBA gender benchmark, Equileap, UN Women's Empowerment Principles

The Company provides gender wage gap information and extends this requirement to all relevant business partners.

- ➔ A. The Company demonstrates that it has already closed the gender wage gap **OR** that it has a timebound commitment for closing the gender wage gap.
- ➔ B. The Company reports gender wage gap information at the Company level across multiple pay bands.
- ➔ C. The Company extends this expectation to all relevant suppliers, contractors, subcontractors, and other business relationships.

## Theme JT. Just transition

The World Benchmarking Alliance has developed six Just Transition indicators that are used to assess companies in the Renewable Energy & Human Rights Benchmark. For more information on the WBA's Just Transition methodology, see [here](#).

Electric utility companies and oil & gas companies are assessed under all six indicators. IPPs, wind turbine and solar panel manufacturers are assessed under indicators relevant to their role in the renewable energy value chain.

# 3. Serious allegations

In order for responses to serious allegations to be included in the benchmark's serious allegations assessment, they will need to meet a range of criteria, in line with the CHRB methodology:

- ➔ **Severity:** Based on scale, scope and irremediability of adverse impacts
- ➔ **Clear human rights link:** Alleged impacts related to the issues covered under the key sector/salient human rights issues list
- ➔ **Recent:** Allegations must have occurred no more than 3 years prior to the benchmarking cycle
- ➔ **Source:** The indicators in this measurement theme are based on allegations from the BHRRRC database
- ➔ **Detail:** Sufficient level of detail provided on the allegation
- ➔ **Relevance to sector:** The allegations in this section only cover adverse impacts raised about the company's operations and services related to renewable energy

Companies were notified about the serious allegations they were assessed against and given an opportunity to respond or share information in the public domain as part of the benchmarking process if they had not done so already.

## M.1 The company has responded publicly to the allegation

The Company has responded publicly to the allegation and provided further details.

- ➔ **A.** The Company has responded publicly to the allegation (or points to a response by any directly linked business, if relevant).

**Note:** This may be a response the Company has made public through a statement in a publicly accessible document on its website, in the press, or on the Business & Human Rights Resource Centre website.

- ➔ **B.** The response covers each aspect of the allegation in detail.

**Note:** Companies are not expected to provide details that might result in adverse impacts to named or identifiable individuals, nor, in the case of legal action, details of their legal case or evidence, but instead they should provide details of their general assessment of each aspect of the allegation in order to get a score of 2.

## M.2 The company has investigated and taken appropriate action

The Company has engaged with affected stakeholders to identify the causes of the impacts alleged. The Company also reviewed and improved its management systems, informed by the views of affected stakeholders and/or their legitimate representatives, to prevent similar impacts from occurring in the future.

- ➔ **A.** The Company (or the directly linked business, if relevant) has engaged with the affected stakeholders and/or their legitimate representatives as part of understanding the causes of the impacts alleged.
- ➔ **B.** The Company (or any directly linked business, if relevant) has identified what it believes to be the cause of the events concerned (whether or not it is agreed between the parties that human rights impacts arose from the alleged events).
- ➔ **C.** The Company has implemented improvements or reinforced its management system(s) that have been identified to avoid such human rights impacts in the future.
- ➔ **D.** The Company describes how the views of affected stakeholders or their legitimate representatives have influenced the actions the Company has taken to prevent similar human rights impacts in future.

## M.3 The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)

The Company has provided remedy to affected stakeholders. The Company also demonstrates that the remedy offered is satisfactory to affected stakeholders and that it has been provided as agreed. If the Company was not involved in the alleged impact(s), it provides evidence to demonstrate this.

**Note:** In circumstances where the Company is unable to locate the relevant stakeholder(s) to have a dialogue or provide remedy for reasons of anonymity, the CHRB still expects the Company to review its management systems and to engage in a dialogue with stakeholders, interpreted as the stakeholder type, not the specific alleged victims (e.g., individuals in similar working and living conditions in the same region, depending on the allegation).

- ➔ **A.** The Company has provided (or used its leverage to persuade any directly linked business, if relevant, to provide) remedy to the affected stakeholders **OR** the Company provides detailed evidence that the affected stakeholders did not suffer the impacts alleged or that the Company was not directly linked to the business or individuals who did cause or contribute to those impacts.
- ➔ **B.** The Company provides evidence that the remedy offered is satisfactory to the affected stakeholders **AND** the remedy has been provided as agreed **OR** the Company has participated in an independent process that has concluded that the affected stakeholders did not suffer the impacts or that the Company was not directly linked to the business or individuals who did cause or contribute to those impacts.

For serious allegations where the CHRB criteria are not applicable, alternative criteria may be used to assess company performance. In the 2025 Benchmark, the following indicators are applied to serious allegations related to linkages to forced labour in XUAR:

### **M1: Public mapping of full supply chain related to allegation**

- ➔ **A.** The Company has adopted a public commitment to full transparent mapping of its solar panels supply chains to raw materials level.
- ➔ **B.** The Company publishes independently verified full solar panel supply chains to raw materials level. The information published by the company includes names of suppliers and locations for all destination markets.<sup>12</sup> As a first step towards transparency, companies may have adopted traceability policies and processes.<sup>13</sup>

### **M2: Steps taken in line with UNGPs for any identified links in supply chains with areas at high risk of forced labour, including regions designated as such by UN bodies**

- ➔ **A.** If mapping identifies suppliers linked to regions where there is a high risk of forced labour, including those identified by UN bodies, 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).
- ➔ **B.** The company indicates that this information is relevant to all destination markets.

**Note:** Any disengagement needs to be verified and decision-making to continue engagement with “crucial business relationships” in high-risk area needs to be explained, in line with [OHCHR Guidance on Business & Human Rights in Challenging Contexts](#) (“Where a business enterprise has determined that a relationship is indeed “crucial” within the meaning of Guiding Principle 19, and that it will be continuing with the relationship on that basis, it should be transparent with stakeholders and the public at large about the decision-making process used to arrive at that determination and the criteria used, which should be objectively reasonable.”)

# 4. Low-carbon transition

Scores for Electric Utilities companies and oil & gas companies are directly issued from [WBA Climate & Energy benchmarks](#) (ACT – ‘Assessing low-Carbon Transition’ scores).

The ACT methodology is available [here](#).

- ➔ For Electric Utilities companies, the ACT assessment [methodology](#) looks at past and future expected emissions trends, adopted targets and alignment with 1.5° sectoral pathways developed by the Science-Based Targets Initiatives, corporate investments in low-carbon technologies and products (material and intangible), management oversight of climate change and low-carbon transition plan including scenario development, policy engagement and business model.
- ➔ For Oil & Gas companies, the ACT assessment [methodology](#) looks at alignment of company’s targets across value chains, future projected emissions and locked-in emissions, plans to develop low-carbon business activities and products including material and intangible investments, management oversight including scenario development, supplier and client engagement, policy engagement and overall contribution of business model to the drivers of the transition.

ACT overall scores provided by the World Benchmarking Alliance are directly integrated in the companies’ scorecard and calculation of overall scores.

# Endnotes

- 1 In the 2023 edition, EDF Renewables and Enel Green Power were assessed at subsidiary level but when their parent companies had relevant policies these were taken into consideration as applying to them.
- 2 In the 2023 edition, EDF Renewables and Enel Green Power were assessed at subsidiary level but when their parent companies had relevant policies these were taken into consideration as applying to them.
- 3 Note on Independent Power Producers: These Companies either produce >90% of their electricity from renewable energy sources and are not connected to broader energy companies in their corporate structure or have corporate structures that connect them to other energy companies but have not been included in this year's World Benchmarking Alliance Electric Utilities assessments to date.
- 4 bp has acquired Lightsource bp and sold its wind assets in 2024. Therefore, bp parent company policies are assessed as part of Lightsource bp's assessment.
- 5 In addition to the Core UNGPs indicators, two additional indicators have been included on this list from the WBA's Corporate Human Rights Benchmark (A.2.1) and Core Social Indicators (CSI 18).
- 6 Where a company allows political contributions, it would meet element (b) if it only allows them by exception and clearly states the criteria for making them.
- 7 While manufacturers may not have direct involvement in undertaking consultations with Indigenous Peoples at the project siting stage, they can use their leverage through downstream human rights due diligence practices to expect projects they supply respect Indigenous Peoples' rights in line with international law and standards.
- 8 While manufacturers may not have direct involvement in undertaking consultations with Indigenous Peoples at the project siting stage, they can use their leverage through downstream human rights due diligence practices to expect projects they supply respect Indigenous Peoples' rights in line with international law and standards.
- 9 While manufacturers may not have direct involvement in consultations with affected stakeholders whose land rights may be affected at the project siting stage, they can use their leverage through downstream human rights due diligence practices to expect projects they supply respect land rights in line with international law and standards.
- 10 While manufacturers may not have direct involvement in consultations with affected stakeholders whose land rights may be affected at the project siting stage, they can use their leverage through downstream human rights due diligence practices to expect projects they supply respect land rights in line with best practice, including through the promotion of transparency of the impact of potential displacements. Other actors, including investors, may also request project developers to disclose similar information.
- 11 ["Business, human rights and conflict-affected regions: towards heightened action,"](#) UN Working Group on business and human rights, July 2020.
- 12 For the majority of companies, this allegation is related to solar supply chains. For any companies where the allegation is related to wind supply chains, the indicator is as follows: "Company publishes independently verified full wind turbine supply chains to raw material level, including names of suppliers and locations for all destination markets."
- 13 While this will be recognised in the assessment, only full supply chain transparency can earn points for this indicator.



## Business & Human Rights Resource Centre

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**Business & Human Rights Resource Centre** is an international NGO which tracks the human rights impacts of over 10,000 companies in over 180 countries, making information available on our 10-language website.



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