

**Renewable Energy & Human Rights Benchmark 2023  
Company Profile**

**Company name** CLP Holdings  
**Sub-sector** Project developer  
**Overall score** 16.6% weighted average

Section score	Weighting	For section
23.5%	20%	1. UNGP core indicators
6.8%	40%	2. Salient human rights risks
0.0%	20%	3. Serious allegations
45.7%	20%	4. ACT assessment as conducted by the World Benchmarking Alliance*

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: [business-humanrights.org](https://business-humanrights.org)

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 2023 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 2022 CHRB methodology (20% of total)**

**A. Policy commitments and governance**

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: General HRs commitment: CLP's Group Labour Standards contain "CLP's Commitment to Human Rights at Work," which states that "[w]e respect all internationally recognised human rights relevant to our operations. In accordance with the United Nations Guiding Principles on Business and Human Rights, our commitments are based on the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work." [CLP's Group Labour Standards: <a href="https://clpgroup.com">clpgroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Commitment to UNGPs: See above. [CLP's Group Labour Standards: <a href="https://clpgroup.com">clpgroup.com</a>]</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not Met: Commitment to ILO core principles: CLP's Group Labour Standards contain "CLP's Commitment to Human Rights at Work," which states that "[w]e respect all internationally recognised human rights relevant to our operations. In accordance with the United Nations Guiding Principles on Business and Human Rights, our commitments are based on the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work."</li> </ul>

\* For information on the ACT methodology and scoring criteria please refer to the [World Benchmarking Alliance](https://worldbenchmarkingalliance.com).

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>However, 'based on' the principles is not considered strong enough wording to indicate commitment. [CLP's Group Labour Standards: <a href="http://clpgroup.com">clpgroup.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Explicitly lists all four ILO core principles: CLP's Group Labour Standards include specific commitments covering child labour and forced labour, freedom of association and to join labour unions in accordance with local law, working hours, fair and decent work, working conditions, and equality, discrimination and harassment. However, it is unclear if the Company is committed to respecting the right to FoA/CB in all circumstances. No information was found on how the Company would guarantee those rights where local laws prohibit the exercise of those rights. [CLP's Group Labour Standards: <a href="http://clpgroup.com">clpgroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expects suppliers to commit to ILO core principles: CLP's Supplier Code of Conduct has dedicated provisions covering freedom of association, collective bargaining, child labour, forced labour and discrimination. [CLP's Supplier Code of Conduct: <a href="http://clpgroup.com">clpgroup.com</a>]</li> <li>• Met: Explicitly lists all four ILO core principles for suppliers: See above. [CLP's Supplier Code of Conduct: <a href="http://clpgroup.com">clpgroup.com</a>]</li> </ul>
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to remedy adverse HRs impacts: CLP's Group Labour Standards states that "[i]f employees feel uncomfortable doing this, they may follow CLP's Whistleblowing Policy and contact Group Internal Audit to raise concerns. CLP places importance on the provision of effective remedy wherever any labour rights issues occur in our operations." Criterion is not met for the lack of a policy commitment to remedy adverse impacts caused to individuals and communities affected by the Company's operations. [CLP's Group Labour Standards: <a href="http://clpgroup.com">clpgroup.com</a>]</li> <li>• Not Met: Expects suppliers to make this commitment: CLP's Supplier Code of Conduct states that CLP expects its suppliers to "[p]rovide access to remedy for the supplier's workers and those employed in their supply chains if they are exposed to harm or violation of their human rights." It also expects suppliers to "[e]stablish a process to identify and mitigate risks imposed by products and operational activities on local communities." Criterion is not met because the Code of Conduct makes no mention of a requirement to remedy affected individuals or communities. [CLP's Supplier Code of Conduct: <a href="http://clpgroup.com">clpgroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to collaborate with judicial or non-judicial mechanisms</li> <li>• Not Met: Commitment to work with suppliers on remedy</li> </ul>
A.2.1	Commitment from the top	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Board level responsibility for HRs: Referring to the CLP Code on Corporate Governance, CLP has six board committees. The TOR for the Sustainability Committee encompasses the following elements: social; environmental; health and safety; security; relationships with employees; relationships with communities and other stakeholders; and ethical. [CLP Code on Corporate Governance, 01/2019: <a href="http://clpgroup.com">clpgroup.com</a>] &amp; [CLP Holdings Limited Sustainability Committee, 26/02/2015: <a href="http://clpgroup.com">clpgroup.com</a>]</li> <li>• Not Met: Describes HRs expertise of Board member</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Board member/CEO signal importance of HRs in their communications: In CLP's Group Labour Standards, CEO Richard Lancaster indicates that "[w]e believe that embedding respect for human rights in the workplace improves the lives of everyone who works with us, their families and the communities in which we operate, and ensures that no one is left behind as the energy industry evolves. [...] Our commitment to operating in line with these Standards applies to all aspects of our business operations and is integrated across Group and local policies and processes. We assess, identify, monitor and manage the human rights impacts of our business activities on an on-going basis." However, criterion is not met because the foreword of a Code of Conduct does not qualify here. [CLP's Group Labour Standards: <a href="http://clpgroup.com">clpgroup.com</a>]</li> </ul>

## B Embedding respect and human rights due diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	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> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Senior responsibility for HRs implementation and decision making</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes day-to-day responsibility for implementing HRs commitments</li> <li>• Not Met: Day-to-day resources and expertise allocation in own operations</li> <li>• Not Met: Resources and expertise allocation in supply chain</li> </ul>
B.2.1	Identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes process of identifying risks in own operations: The 2022 Sustainability Report outlines CLP's materiality assessment process, which covers its human rights impacts: "Identify impacts, risks and opportunities: Applying the assessment process, in 2022 (Year 2) CLP identified over 80 potential stakeholder impacts and financial risks and opportunities. 'Impact materiality' refers to significant positive or negative impacts on people, the economy and the environment, including impacts on human rights, as per the GRI definition." One of the sub-topics identified is "Upholding human rights in the supply chain." Criterion is not met for the lack of a more detailed description of the human rights risk identification process. [2022 Sustainability Report, 2023: <a href="https://www.clpgroup.com">clpgroup.com</a>]</li> <li>• Not Met: Describes process for identifying risks in business relationships</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes global risk identification system incl. stakeholder consultation: The 2022 Sustainability Report outlines CLP's stakeholder engagement approach in relation to capital providers, customers, our people, partners, and community. Criterion is not met for the lack of a more detailed description of how the Company identifies human rights risks in consultation with affected stakeholders/experts. [2022 Sustainability Report, 2023: <a href="https://www.clpgroup.com">clpgroup.com</a>]</li> <li>• Not Met: Describes how risk identification system is triggered by new circumstances</li> <li>• Not Met: Describes risks identified in relation to new circumstances</li> </ul>
B.2.2	Assessing human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes assessment process and discloses salient HRs risks: The 2022 Sustainability Report outlines CLP's materiality assessment process, which covers its human rights impacts: "Identify impacts, risks and opportunities: Applying the assessment process, in 2022 (Year 2) CLP identified over 80 potential stakeholder impacts and financial risks and opportunities. 'Impact materiality' refers to significant positive or negative impacts on people, the economy and the environment, including impacts on human rights, as per the GRI definition." One of the sub-topics identified is "Upholding human rights in the supply chain." In a subsequent chapter, the Company identifies the elimination of modern slavery and labour exploitation as its responsibility: "Human rights due diligence is critical in managing supply chain risks. In becoming a Utility of the Future, CLP continues to promote supply chain transparency as a competitive advantage and recognises its responsibility to eliminate all forms of modern slavery and labour exploitation." Criterion is not met given the report only outlines the general risks facing the Company and does not describe how relevant factors, such as geographical, economic, social and other factors, are taken into account. [2022 Sustainability Report, 2023: <a href="https://www.clpgroup.com">clpgroup.com</a>]</li> <li>• Not Met: Describes how process applies to supply chain: According to the 2022 Sustainability Report, "[h]aving introduced this SCoC, CLP is now establishing a third-party risk management framework to ensure transparency of supplier performance along the value chain and to enhance its capability to assess the different types of risks associated with its supply chain. In introducing these measures, CLP will work with its suppliers in a collaborative way and help them in building sustainable businesses." However, it is not clear how the Company conducts the assessment. [2022 Sustainability Report, 2023: <a href="https://www.clpgroup.com">clpgroup.com</a>]</li> <li>• Not Met: Public disclosure of results of HRs risk assessment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how assessment involved affected stakeholders: The 2022 Sustainability Report outlines CLP's stakeholder engagement approach in relation to capital providers, customers, our people, partners, and community. Criterion is not met for the lack of a more detailed description of how the Company engages with stakeholders in the process. [2022 Sustainability Report, 2023: <a href="https://www.clpgroup.com">clpgroup.com</a>]</li> </ul>
B.2.3	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> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes system to prevent, mitigate and remediate HRs issues: With regard to the supply chain risks identified, the 2022 Sustainability Report outlines the Company's risk management approach: "In accordance with this new</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>roadmap, CLP released its first Supplier Code of Conduct (SCoC) in December 2022, and updated the Responsible Procurement Policy Statement which has been in use by the Group since 2012. The SCoC is derived from CLP's values, policies, standards and objectives, and clearly states CLP's expectations on the suppliers it is doing business with and those who want to do business with CLP. The SCoC articulates 11 responsible procurement practices." Criterion is not met due to the lack of a global system to prevent, mitigate or remediate salient human rights issues at large. The above example only applies to one type of human rights risk identified. [2022 Sustainability Report, 2023: <a href="https://www.clpgroup.com">clpgroup.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how global system applies to supply chain: See above.</li> <li>• Not Met: Example of actions decided on at least 1 salient HRs issue</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how stakeholders involved in decisions about actions taken</li> </ul>
B.2.4	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> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes system for evaluation effectiveness of actions: According to the 2022 Sustainability Report, "[h]aving introduced this SCoC, CLP is now establishing a third-party risk management framework to ensure transparency of supplier performance along the value chain and to enhance its capability to assess the different types of risks associated with its supply chain. In introducing these measures, CLP will work with its suppliers in a collaborative way and help them in building sustainable businesses." Criterion not met due to lack of information on evaluation of effectiveness of actions and risk management system beyond its supply chain risks. [2022 Sustainability Report, 2023: <a href="https://www.clpgroup.com">clpgroup.com</a>]</li> <li>• Not Met: Example of lessons learned from evaluation effectiveness of actions</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involves stakeholders in evaluation effectiveness of actions</li> </ul>
B.2.5	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Provides two examples of comms with stakeholders</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes challenges to effective comms and how it is working to address them</li> </ul>

### C. Remedies and grievance mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism accessible to all workers: According to the 2022 Sustainability Report, "[e]ach CLP business has an employee grievance procedure in place that reflects the CLP Value Framework and any applicable local legal requirements. Where any employee has concerns, established procedures are followed to address grievances. These procedures ensure fairness and independence in the investigation process, and respect the confidentiality of the parties involved. CLP's Whistleblowing Policy is publicly accessible, enabling employees and related third parties to raise concerns about any irregularity through a confidential channel." [2022 Sustainability Report, 2023: <a href="https://www.clpgroup.com">clpgroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism available in appropriate languages and workers made aware: The 2022 Sustainability Report indicates that "[t]he Whistleblowing Policy is available to the public in both English and Chinese." Additionally, in terms of training, the subsequent paragraph indicates that "Code of Conduct training is mandatory for all staff joining the Company. CLP promotes the Code of Conduct and Whistleblowing Policy to employees, on a regular basis, by advising of any updates or revisions." [2022 Sustainability Report, 2023: <a href="https://www.clpgroup.com">clpgroup.com</a>]</li> <li>• Met: Describes how workers in supply chain access grievance mechanism: CLP's Whistleblowing Policy states that "[t]his policy is designed to encourage employees of CLP Group and related third parties (e.g. customers, suppliers, etc., who deal with the Company) ('Third Parties') to raise concerns, in confidence, about misconduct, malpractice or irregularities in any matters related to the Company. [...]" [Whistleblowing Policy, 10/2021: <a href="https://www.clpgroup.com">clpgroup.com</a>]</li> <li>• Not Met: Expects suppliers to convey expectation to their suppliers</li> </ul>
C.2	Grievance mechanism(s) for external	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism accessible to all external individuals and communities: CLP's Whistleblowing Policy states that "[t]his policy is designed to</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	individuals and communities		<p>encourage employees of CLP Group and related third parties (e.g. customers, suppliers, etc., who deal with the Company) ("Third Parties") to raise concerns, in confidence, about misconduct, malpractice or irregularities in any matters related to the Company. [...] It is not possible to give an exhaustive list of the activities that constitute misconduct, malpractice or irregularity covered by this policy. For example, CLP Group expects all employees to observe and apply the CoC principles in the conduct of CLP Group's business. Employee behaviour that is not in line with CoC principles could constitute a misconduct, malpractice, or irregularity that should be reported." However, it is not clear what the Company considers to be "related third parties". The examples given suggest a business relationship to be necessary. The Company further states in its Supplier Code of Conduct that 'As we cascade our commitments and expectations in doing business responsibly to our suppliers, we encourage our suppliers to do the same with their upstream suppliers.' However, an expectation for suppliers was not found. [Whistleblowing Policy, 10/2021: <a href="http://clpgroup.com">clpgroup.com</a>] &amp; [CLP's Supplier Code of Conduct: <a href="http://clpgroup.com">clpgroup.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware</li> <li>• Not Met: Describes how external individuals/communities access grievance mechanism</li> <li>• Not Met: Expects supplier to convey expectation to their suppliers</li> </ul>
C.7	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes approach taken to remedy adverse HRs impacts</li> <li>• Not Met: Describes how remedy would be provided if no adverse impact identified</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes changes to systems, processes and practices to prevent future impacts</li> <li>• Not Met: Describes approach to monitoring/implementing agreed remedy</li> <li>• Not Met: Describes approach to learning from incidents if no adverse impacts identified</li> </ul>

### CSI. Responsible lobbying and political engagement fundamentals

Indicator Code	Indicator name	Score (out of 2)	Explanation
CSI.18	Responsible lobbying and political engagement fundamentals	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Publicly available policy statement(s) (or policy(ies)) setting out lobbying and political engagement approach.: CLP Group has a Policy on Making Political Contributions (updated Aug 2022). However, this document does not contain a statement on lobbying and political engagement. The 2022 Sustainability Report outlines CLP Group's approach to public policy and political engagement (see pp.113-116). In future assessments, the Company will be expected to have embedded this commitment in a policy document. [2022 Sustainability Report, 2023: <a href="http://clpgroup.com">clpgroup.com</a>] &amp; [Policy on making political contributions, 08/2022: <a href="http://clpgroup.com">clpgroup.com</a>]</li> <li>• Met: Publicly available policy statement that specifies the Company does not make political contributions: The Policy on Making Political Contributions indicates that "[i]t is CLP Group's general policy to avoid making political contributions (donations). CLP Group is non-political and chooses to remain politically neutral except in those instances where shareholder interests are directly impacted. In these instances, the Company will attempt to influence governments or individuals through direct negotiations." The 2022 Sustainability Report also indicates that from 2020 to 2022, CLP Group made no political contributions to lobbying groups or political campaigns/organisations, except for trade associations and/or tax-exempt groups. In the 2022 Sustainability Report, CLP Group has listed out the organisations it has contributed to in the last three years. Criterion is met because the Company only allows political contributions by exception and clearly states the criteria for making them. [Policy on making political contributions, 08/2022: <a href="http://clpgroup.com">clpgroup.com</a>] &amp; [2022 Sustainability Report, 2023: <a href="http://clpgroup.com">clpgroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Meets all requirements under score 1</li> <li>• Met: Disclosure of expenditures on lobbying activities: The 2022 Sustainability Report indicates that from 2020 to 2022, CLP Group made \$0 political contributions to "Lobbying, interest representation or similar," "Local, regional or national political campaigns, organisations or candidates" or "Others (e.g. spending related to ballot measures or referendums)" in the last three years. [2022 Sustainability Report, 2023: <a href="http://clpgroup.com">clpgroup.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Requirement for third-party lobbyists to comply with the Company's lobbying and political engagement policy (or policies)</li> </ul>

## 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> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to respect indigenous peoples' rights with explicit reference to UN Declaration</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Description of process for identifying indigenous persons and customary lands.</li> </ul> <p>Commitment to FPIC (in line with ILO No.169)</p> <ul style="list-style-type: none"> <li>• Not Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources</li> </ul>
D.2.PD	Engagement with all affected communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how local communities identified and engaged in the last two years</li> <li>• Not Met: Provides two examples of engagement with communities</li> <li>• Not Met: Examples of engagement refer to marginalised groups and provide additional detail</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HRs issues</li> <li>• Not Met: Describes how stakeholders views influenced company's HRs approach</li> </ul>
D.3.PD	Benefit and ownership sharing policy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to identify benefit and ownership sharing</li> <li>• Not Met: Commitment includes right to decide own priorities for communities</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Disclosure of statistics for each project describing demographics of benefit/ownership sharing</li> <li>• Not Met: Disclosure how affected communities participated in decision-making</li> </ul>
D.4.PD	Local wind & solar energy access, affordability	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Actions taken to support access and affordability of renewable energy in the value chain: The 2022 Climate-related Disclosure Report states that "CLP will also progressively phase out its coal-based assets before 2040 – a decade earlier than previously pledged. The transition will be accelerated where market conditions allow, with CLP acting responsibly and taking a considered approach that limits adverse effects on its communities and on power supply reliability, system security and affordability." CLP's affordability initiatives however pertain to energy-saving in the context of conventional energy sources. The Company provided additional evidence to the BHRRC outlining its support for renewable energy development, FiT and RECs to transit low carbon energy sources. However, it was not material for the assessment. [2022 Climate-related Disclosures Report, 2023: <a href="https://www.clpgroup.com">clpgroup.com</a>] &amp; [CLP INFORMATION KIT, 11/2022: <a href="https://www.clp.com.hk">clp.com.hk</a>]</li> <li>• Not Met: Including a timebound actions plan and reporting targets</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Public support for government policies addressing energy access: The Company states that 'CLP Power Hong Kong Limited ("CLP Power") welcomes and supports the net-zero carbon emissions long-term and medium-term targets and new measures set out for Hong Kong's long-term decarbonisation strategy in the "Hong Kong's Climate Action Plan 2050" announced by the Government today (8 October). This will help Hong Kong achieve carbon neutrality before 2050.' It also states that 'CLP Power Hong Kong Limited ("CLP Power") welcomes and supports the acceleration of decarbonisation efforts announced by the Chief Executive Mr John Lee in the 2022 Policy Address today (19 October) to help Hong Kong achieve carbon neutrality before 2050, including expediting the incorporation of district cooling systems in New Development Areas and providing a roadmap for the promotion of electric public transport and commercial vehicles. CLP Power also supports the Government's housing supply and infrastructure development plans by providing a stable and reliable power supply to energise Hong Kong's future development.' However, both examples are mainly focused on achieving net zero, but are not addressing energy access challenges. [Decarbonisation Efforts and</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			Housing and Infrastructure Development Plans Announced in Policy Address, 19/12/2022: <a href="http://clp.com.hk">clp.com.hk</a> & [Net-Zero Carbon Emissions Targets and New Measures Announced in the Climate Action Plan 2050, 18/10/2021: <a href="http://clp.com.hk">clp.com.hk</a> ]

## 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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Commitment to respect land ownership/natural resources as in VGGT. Discloses how identifies legitimate tenure holders.</li> <li>• Not Met: Disclosure of locations of projects including numbers in urban, rural, natural areas</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Extends expectation to business relationships</li> <li>• Not Met: Steps taken to use leverage to resolve land rights issues or disclosure that no such issues arose</li> </ul>
E.2.PD	Just and fair physical and economic displacement policy implementation including free, prior and informed consent	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Commitment to follow IFC PS 5 for physical and economic displacements</li> <li>• Not Met: Commitment not to relocate without FPIC and to providing compensation</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Publishes statistics on numbers affected by relocations (current and planned projects)</li> <li>• Not Met: Publishes regular reviews of living conditions after relocation</li> <li>• Not Met: Description of approach to physical and economic displacement</li> </ul>

## F. Security and conflict-affected areas (incl. responsible mineral sourcing)

Indicator Code	Indicator name	Score (out of 2)	Explanation
F.1.PD	Operating in or sourcing from conflict-affected areas	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Commitment to heightened HRDD in conflict affected areas</li> <li>• Not Met: Steps taken to assess and mitigate these risks with conflict sensitive lens</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How stakeholders are involved in the process to mitigate risks</li> </ul>
F.2.PD	Evidence of security provider human rights assessments	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Regularly conducts risk assessment regarding security forces</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Commitment to Voluntary Principles on Security and HRs</li> <li>• Not Met: If applicable, discloses use of private security providers and uses only ICoCA members.</li> </ul> If direct employment of security, commitment to follow ICoCA itself.
F.3.PD	Responsible sourcing of minerals: Arrangements with suppliers	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Statement on OECD Guidance aligned due diligence: The 2022 Sustainability Report indicates that "[h]uman rights due diligence is critical in managing supply chain risks. In becoming a Utility of the Future, CLP continues to promote supply chain transparency as a competitive advantage and recognises its responsibility to eliminate all forms of modern slavery and labour exploitation." Criterion is not met due to the lack of specific reference to the due diligence steps outlined in the OECD Guidance. [2022 Sustainability Report, 2023: <a href="http://clpgroup.com">clpgroup.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Requirement on OECD Guidance aligned due diligence in contracts/codes with suppliers</li> <li>• Not Met: Describes work with suppliers on risk assessment and improving DD</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
F.4.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> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes risk identification and disclosure in line with OECD Guidance: The 2022 Sustainability Report indicates that "[h]uman rights due diligence is critical in managing supply chain risks. In becoming a Utility of the Future, CLP continues to promote supply chain transparency as a competitive advantage and recognises its responsibility to eliminate all forms of modern slavery and labour exploitation." However, this sub indicator looks for the description of its processes for identifying and prioritising risks and impacts in its supply chain as set out in the OECD Guidance in relation to renewable energies business (solar/wind). The Company is also expected to disclose the risks identified. [2022 Sustainability Report, 2023: <a href="https://www.clpgroup.com">clpgroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Expectation of suppliers to disclose supply chain mapping</li> <li>• Not Met: Risk identification process covers all minerals</li> </ul>
F.5.PD	Responsible sourcing of minerals: Risk management in the mineral supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Suppliers using minerals in equipment provided to describe steps taken to respond to risks in supply chain</li> <li>• Not Met: Those suppliers to describe monitoring of risk prevention/mitigation measures</li> <li>• Not Met: Those suppliers to disclose significant improvement over time</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How suppliers and affected stakeholders engaged on strategy</li> <li>• Not Met: Processes cover all minerals</li> </ul>

## G. Protection of human rights and environmental defenders

Indicator Code	Indicator name	Score (out of 2)	Explanation
G.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> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Zero tolerance of threats/attacks on HRDs</li> <li>• Not Met: Expectation on business partners in value chain to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Description of how working with HRDs to create safe and enabling environment</li> </ul>

## H. Labour rights (incl. protection against forced labour)

Indicator Code	Indicator name	Score (out of 2)	Explanation
H.1.PD	Health and safety	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Discloses quantitative H&amp;S information (injury rates or lost days, and fatalities): The 2022 Sustainability Report discloses CLP Group's quantitative information relating to fatalities, days away from work injuries, lost time injury rate, high-consequence injuries, total recordable injury rate, work-related ill health, and lost days across different regions, covering both employees and contractors. Specifically, CLP recorded zero fatalities in 2022. The total number of lost days (employees) was 176 in 2022 (breakdown available in the 2022 Sustainability Report). [2022 Sustainability Report, 2023: <a href="https://www.clpgroup.com">clpgroup.com</a>]</li> <li>• Met: Expectation extends to relevant business relationships: CLP's Supplier Code of Conduct states that CLP expects its suppliers to "[c]ontinuously monitoring health and safety performance and regularly disclosing the progress to CLP and wider stakeholders." The Company further discloses quantitative health and safety information of its contractors. [CLP's Supplier Code of Conduct: <a href="https://www.clpgroup.com">clpgroup.com</a>] &amp; [2022 Sustainability Report, 2023: <a href="https://www.clpgroup.com">clpgroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Sets targets for H&amp;S performance (including injury rates or lost days and fatalities): The 2022 Sustainability Report indicates that, under "Goals and targets," "CLP is committed to ensuring all its activities and operations focus on the elimination of fatalities, life-altering injuries, and the occurrence of significant HSE events." The Company provided feedback for this indicator, however the subindicator was already awarded. [2022 Sustainability Report, 2023: <a href="https://www.clpgroup.com">clpgroup.com</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Met targets or explains why not or how improve H&amp;S management systems: 2022 Sustainability Report explains that "[b]oth the lost time injury rate (LTIR) and total recordable injury rate (TRIR) have slightly increased in 2022. This is in part due to a single event with multiple injuries in our Hong Kong business and a significant increase of over 2 million work exposure hours conducted in 2022." The 2022 Annual Report also states that "In 2022, the total recordable injury rate (TRIR) and lost time injury rate (LTIR) for employees and contractors were marginally higher than a year earlier, mostly related to maintenance activity at Castle Peak Power Station. There was a reduction in injury rates at EnergyAustralia, reflecting ongoing safety improvements in its operations. Meanwhile, additional project activities at Apraava Energy resulted in a small increase in minor incidents. In 2022, there was an increase of more than two million manhours for operational and project activities across the Group." Criterion is not met because the Company does not explain why the targets were not met. The Company states under the section Continuous Improvement that 'Thorough investigations are conducted into all incidents that have the potential to cause serious injuries. The aim is to move beyond simply looking at human error as a cause, and to understand the more complex latent conditions within the systems people operate in that contribute to incidents, to prevent recurrence of similar incidents. CLP is committed to understanding how decisions and actions would be made by employees at a particular point in time in their work, by understanding the context which our people operate in.' [2022 Annual Report, 2023: <a href="https://www.clpgroup.com">clpgroup.com</a>] &amp; [2022 Sustainability Report, 2023: <a href="https://www.clpgroup.com">clpgroup.com</a>]</li> </ul>
H.2.PD	Forced labour risk management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Board level oversight over policies on forced labour in supply chain. How relevant stakeholders informed board discussions</li> <li>• Not Met: Suppliers to have these arrangements in place</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Discloses ongoing efforts to prevent and mitigate forced labour in own ops and supply chain: CLP outlines its policy and practices addressing forced labour in its reply to BHRRC Just Transition: "To further assess our supply chains, CLP Power Hong Kong Limited is undertaking a pilot study of about 100 direct suppliers, of which 15% are located in Mainland China, to map where their products or services were sourced from and to understand more about their procurement practices. The study is expected to be completed by the end of 2023. CLP will then analyse the results and decide the next steps. [...] It also has stringent processes in place that are regularly reviewed to identify where risks of modern slavery exist within its business. The process includes surveying its suppliers by asking a range of questions relating to suppliers' knowledge of their supply chain; organisational policies, including modern slavery; countries from which the products or services were sourced from; the country in which they are headquartered; awareness of allegations of modern slavery in their operations, industry or supply chain; organisational size; and whether they screen suppliers in their supply chain for modern slavery risks."</li> <li>• Not Met: Factors to be considered when ending a business relationship</li> </ul>
H.3.PD	Prohibition of forced labour: Wage practices	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on paying in full and on time in supplier codes and contracts: CLP's Group Labour Standards states that "[w]e are committed to treating employees fairly and respecting the fundamental right of Decent Work. We safeguard this by: [...] Making wage payments directly to employees or to an employee-controlled account. Payments shall be made regularly and on time." However, there is no mention of supplier expectation in relation to timely, direct and full payments. [CLP's Group Labour Standards: <a href="https://www.clpgroup.com">clpgroup.com</a>]</li> <li>• Not Met: Describes work with suppliers on paying workers regularly, in full and on time</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment scope of failure to pay workers in full and on time in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
H.4.PD	Prohibition of forced labour: Restrictions on workers	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on free movement in supplier codes and contracts</li> <li>• Not Met: Describes working with suppliers on free movement of workers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of restriction of movement in supply chain</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Capacity building to enable suppliers to cascade forced labour policies down supply chain</li> </ul>
H.5.PD	Freedom of association and collective bargaining	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment on FoA/CB and requirements in suppliers codes and contracts: CLP's Supplier Code of Conduct requires suppliers to "[r]espect workers' right to freedom of association and collective bargaining; allow employees to form or join professional unions and other organisations and professional bodies of their choice." Criterion is not met however because there is no mention of the prohibition of intimidation, harassment, retaliation and violence against trade union members. [CLP's Supplier Code of Conduct: <a href="http://clpgroup.com">clpgroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on FoA/CB</li> <li>• Not Met: Assessment of scope of restriction of FoA/CB in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
H.6.PD	Living wage (in supply chains)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on living wage in supplier codes and contracts: CLP's Supplier Code of Conduct states that CLP expects its suppliers to "[p]ay a living wage or legally established minimum wage; with a similar obligation on suppliers in the upstream supply chain." However, it is not clear what the expectation on suppliers is where the legally established minimum wage is below what is considered a living wage for the area. [CLP's Supplier Code of Conduct: <a href="http://clpgroup.com">clpgroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on living wage, beyond tier 1 suppliers</li> <li>• Not Met: Requirement for suppliers to regularly review definition of living wages with relevant trade unions</li> </ul>

## I. Right to a healthy and clean environment

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.1.PD	Environmental impact assessment and remediation	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Conducts public EIA and CIA for renewable energy projects: According to the 2022 Sustainability Report, CLP undertakes environmental impact assessments for its energy projects (mandatory prior to project construction and applicable to all projects over which CLP has majority ownership or operational control): "CLP considers the Environmental Impact Assessment (EIA) a crucial step in ensuring all relevant environmental impacts such as air quality and biodiversity have been properly considered and addressed by effective mitigation measures. CLP has processes in place to fulfil the strict EIA requirement and recommendations stipulated by local regulators and it follows these same assessment requirements in countries where regulations are not as stringent. For instance, CLP mandates an EIA for all major generation projects in India, even though it is not a statutory requirement for renewable energy projects in the country." However it remains unclear if the company also undertakes cumulative impact assessments. In future assessments, the Company will also be expected to explain or demonstrate under what circumstances it undertakes Cumulative Impact Assessments for its renewable energy projects in order to meet this criteria. [2022 Sustainability Report, 2023: <a href="http://clpgroup.com">clpgroup.com</a>]</li> <li>• Not Met: Assessments comply with Espoo Convention and/or the EU Environmental Impact Assessment Directive and fulfil certain standards: The Company provided further evidence to the BHRRC regarding this indicator. However, no publicly available statement on the requirements of this subindicator was found.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Reports on compliance with government-mandated remediation fund requirements</li> <li>• Not Met: Reports on how an entity guarantees payment for environmental restoration or compensation</li> </ul>
I.2.PD	Life cycle assessment	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Expectation for suppliers to conduct regular public life cycle assessments (including risks related to raw material sourcing, waste, and decommissioning)</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Requires suppliers to have action plans to address adverse impacts identified</li> </ul>

## J. Transparency and anti-corruption

Indicator Code	Indicator name	Score (out of 2)	Explanation
J.1.PD	Anti-corruption due diligence and reporting	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to prohibiting bribes to public officials: No specific reference to bribery of public officials, but in terms of bribery, the CLP Code of Conduct indicates that "The Company is committed to abiding by all laws and regulations or if necessary to exceeding them, to prevent bribery wherever we do business. We interpret the term 'bribe' broadly to include any illicit advantage offered or accepted as an inducement to or reward for performing or abstaining from performing any Company duties. Items considered bribes include cash, cash equivalents, loans, commissions, benefits in kind or other advantages. Bribery does not include traditional gifts of nominal value given during festive seasons. The Code forbids paying, offering, asking for, proposing terms for, or accepting, bribes directly or with the assistance of any organization or individual. We are strictly prohibited from discussing terms with people who ask for or offer bribes. Avoiding the no bribery provisions of this Code through the use of agents, partners, contractors, family members or any others acting on someone's behalf is also prohibited. Any employee who receives an offer of bribery must immediately report it to their manager and GIA." [CLP Code of Conduct, 04/2021: <a href="https://www.clpgroup.com">clpgroup.com</a>]</li> <li>• Not Met: Expectation extends to relevant business relationships: No specific reference to the OECD Convention nor foreign public officials, but CLP's Supplier Code of Conduct requires suppliers to "[h]ave a zero-tolerance policy to unethical business activities such as bribery and corruption, money laundering, fraud, extortion and embezzlement, collusion (including participation in cartels), conflict of interest, anti-competitive behaviour, insider trading, and infringement of intellectual property." Additionally, according to the 2022 Sustainability Report, "CLP takes a risk-based approach to responsible procurement across the procurement lifecycle. [...] Specifically, the risk assessment aims to help CLP manage ESG issues, such as labour practices, human rights, modern slavery, child labour, harassment, safety, environment, subcontractor management and anti-bribery along the value chain." However, it remains unclear how CLP extends the no-bribery expectation to other business relationships, in particular in relation to foreign public officials. [CLP's Supplier Code of Conduct: <a href="https://www.clpgroup.com">clpgroup.com</a>] &amp; [2022 Sustainability Report, 2023: <a href="https://www.clpgroup.com">clpgroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Reports on any complaints on corruption and bribery: The 2022 Sustainability Report discloses that "[i]n 2022, 10 breaches of the Code of Conduct were reported, though none were financially or operationally material to the Group, nor did they involve employees at the grade level of senior manager and above. [...] Regarding whistle-blowing cases, five cases were received in 2022 compared with 25 in 2021." It further discloses 'Convicted cases of corruption reported to the Audit &amp; Risk Committee'. However, no evidence was found on cases that did not lead to a conviction. [2022 Sustainability Report, 2023: <a href="https://www.clpgroup.com">clpgroup.com</a>] &amp; [2022 Annual Report, 2023: <a href="https://www.clpgroup.com">clpgroup.com</a>]</li> <li>• Not Met: Reports that no such complaints were made</li> </ul>
J.2.PD	Payments to governments & contract transparency	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Publishing a tax CbCR in line with GRI 207-4, or discloses payments made to governments at project-level including for purchase or rent of land or natural resources related to its renewable energy projects: No information has been identified in the company's policies and reports. In future assessments, the Company will be expected to demonstrate it publishes a tax CbCR and a report on its payments to governments at project level, including for purchase or rent of land or natural resources related to its renewable energy projects</li> <li>• Not Met: Disclosure of terms, contracts, agreements for those payments</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Supports governments to disclose contracts and licenses on renewable energy project in line with EITI</li> </ul>

## K. Diversity, equality and inclusion

Indicator Code	Indicator name	Score (out of 2)	Explanation
K.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> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Provides mandatory and regular training as per ILO No 190: The 2022 Sustainability Report indicates that "CLP launched its Diversity &amp; Inclusion (D&amp;I) Council in Hong Kong in the second half of 2022. Comprising members of the senior leadership team, the Council aims to strengthen business outcomes and foster innovation through D&amp;I. While the primary focus on gender diversity remains, other key D&amp;I themes relevant to CLP's business were identified. Going into 2023, the Council will further define roles and responsibilities and set a clear roadmap to drive D&amp;I progress in the business, including developing priorities and establishing operational guidelines in key employment practices. [...] The CLP Group was named Hong Kong's most inclusive employer and ranked fourth in the Asia-Pacific region in the Inclusive Index Report by international consultancy, Equality Group." Criterion is not met because it remains unclear if and how CLP provides diversity training to staff. [2022 Sustainability Report, 2023: <a href="https://www.clpgroup.com">clpgroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Requires suppliers to do the same</li> <li>• Not Met: Provides materials and access to resources for trainings</li> </ul>
K.2.PD	Gender balance and sensitivity	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Timebound action plan to integrate gender lens to all relevant documents including on value chain</li> <li>• Not Met: Demonstrates progress through annual reporting</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Women and non-binary people make up at least 40% of the Company's board of directors and executives, or executive board: CLP has a clear target of not less than 30% for female Directors representation on the CLP Holdings Board (see for example the Corporate Governance Report in the 2022 Annual Report). Referring to the 2022 Sustainability Report, there is also a "Women in Leadership target," i.e. "To achieve gender balance in leadership positions by 2030 against a 2016 baseline of 22%." Criterion is not met because the ratio of women in leadership was 35.7% in 2022, according to the 2022 Annual Report. [2022 Sustainability Report, 2023: <a href="https://www.clpgroup.com">clpgroup.com</a>] &amp; [2022 Annual Report, 2023: <a href="https://www.clpgroup.com">clpgroup.com</a>]</li> </ul>
K.3.PD	Gender wage gap reporting	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Has closed gender wage gap: According to the 2022 Sustainability Report, "[i]ndependent gender pay equity analysis of CLP's Hong Kong payroll, based on UK disclosure requirements, continued to show a reverse gender pay gap for both hourly pay and bonuses, due to a higher proportion of women in professional and managerial roles." Criterion is not met due to the lack of global pay gap information. [2022 Sustainability Report, 2023: <a href="https://www.clpgroup.com">clpgroup.com</a>]</li> <li>• Not Met: Timebound commitment to close gender wage gap: The 2022 Sustainability Report indicates that "[l]ong-term aspirational Group-wide gender diversity targets have been set, reflecting UN Sustainable Development Goals. [...] Ensuring equal pay for work of equal value is maintained in all CLP Group businesses, that any gender pay equity gap is eliminated, and that CLP meets all relevant local compliance and disclosure standards." Criterion is not met due to the lack of a timebound plan. [2022 Sustainability Report, 2023: <a href="https://www.clpgroup.com">clpgroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Reports information at company level across multiple pay bands</li> <li>• Not Met: Expects business relationships to do the same</li> </ul>

## JT. Just transition<sup>†</sup>

Indicator Code	Indicator name	Score (out of 2)	Explanation
JT.1	Fundamentals of social dialogue and stakeholder engagement in a just transition	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Public commitment to engage in social dialogue with appropriate parties for purposes of bipartite or tripartite negotiations</li> <li>• Not Met: Discloses the categories of stakeholders it engages with on a Just Transition and how they were identified.</li> <li>• Not Met: Disclosure of steps taken to engage with identified stakeholders and its approach to supporting a just transition.</li> </ul>

<sup>†</sup> Assessment for this sub section has been conducted by the World Benchmarking Alliance, see: <https://www.worldbenchmarkingalliance.org/climate-and-energy-benchmark/>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Demonstrates social dialogue and meaningful engagement with stakeholders on all aspects of a just transition.</li> </ul>
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"> <li>• Not Met: Demonstrates how it engages in social dialogue, especially with unions and with stakeholders, in the development of its transition planning.</li> <li>• Not Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on workers.</li> <li>• Not Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on affected stakeholders</li> <li>• Not Met: Sets time-bound and measurable indicators to mitigate social impacts of low carbon transition on business relationships.</li> </ul>
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"> <li>• Not Met: Public Commitment to create and provide or support access to green and decent jobs, as part of the low carbon transition.</li> <li>• Not Met: Assesses and discloses the risk of employment dislocation caused by low carbon transition and related impacts on affected stakeholders.</li> <li>• Met: Demonstrates measures taken to create and support access to green and decent jobs for affected stakeholders.</li> <li>• Not Met: Demonstrates measures taken to ensure green and decent jobs promoting equality of opportunity for women and vulnerable groups</li> </ul>
JT.4.PD	Fundamentals of retaining and re-and/or up-skilling workers for an inclusive and balanced workforce	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Public commitment to re-and/or up-skills workers displaced by the transition to a low carbon economy.</li> <li>• Not Met: Disclosure of its process(es) for identifying skills gaps for workers and affected stakeholders, in the context of the low carbon transition.</li> <li>• Met: Demonstrates measures taken to provide re-and/or upskilling, training or education opportunities for relevant stakeholders.</li> <li>• 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.</li> </ul>
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"> <li>• Not Met: Discloses contribution to social protection systems for relevant stakeholders, and expectations on business relationships to contribute to social protection of affected stakeholders.</li> <li>• Not Met: Discloses its processes for identifying impacts of low carbon transition on workers' and affected stakeholders' social protection.</li> <li>• Not Met: Demonstrates contribution to addressing the impact of the low carbon transition on workers' social protection.</li> <li>• Not Met: Demonstrates contribution to addressing the impact of the low carbon transition on affected stakeholders' social protection.</li> </ul>
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"> <li>• Not Met: Discloses process(es) for aligning its lobbying activities with policies and regulation supporting the just transition.</li> <li>• Not Met: Discloses where its lobbying activities do not align with policies and regulation that support the just transition.</li> <li>• Not Met: Discloses action plan addressing misalignment of lobbying activities with policies and regulation that support just transition.</li> <li>• Not Met: Demonstrates lobbying for just transition and regulations enabling green and decent jobs, reskilling and/or social protection</li> </ul>

## M. Responses to Serious Allegations (20% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(0).0	Serious risks of supply chain forced labour		<p>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 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>CLP Holdings is a project developer active in the solar sector and therefore faces a risk of potential exposure to Uyghur forced labour through its solar panel supply chain. [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": <a href="https://documents-dds-ny.un.org/doc/UNDOC/GEN/G22/07/01/PDF/English/220701.pdf?OpenElement">documents-dds-ny.un.org</a>] [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": <a href="https://www.ohchr.org/en/press-releases/2022/09/xinjiang-report">ohchr.org</a>] [Sheffield Hallam University, May 2021, "In Broad Daylight - Uyghur Forced Labour and Global Solar Supply Chains": <a href="https://www.shu.ac.uk/news/2021/05/in-broad-daylight-uyghur-forced-labour-and-global-solar-supply-chains">shu.ac.uk</a>] [Business and Human Rights Resource Centre, 02/08/2021, "China: Significant proportion of global solar value chain vulnerable to alleged forced labour in Uyghur Region, says major study": <a href="https://www.business-humanrights.org/en/latest-news/china-significant-proportion-of-global-solar-value-chain-vulnerable-to-alleged-forced-labour-in-uyghur-region-says-major-study">business-humanrights.org</a>]</p>



Indicator Code	Indicator name	Score (out of 2)	Explanation
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	<ul style="list-style-type: none"> <li>• Not Met: The Company states that 'From our supplier database, we can track the registered addresses of our direct suppliers. In order to do business with CLP the suppliers of CLP Power Hong Kong Limited and CLPe Solutions Limited are required to complete self-assessments and declare they have no use of forced labour.' It further indicates that 'To further assess our supply chains, CLP Power Hong Kong Limited is undertaking a pilot study of about 100 direct suppliers, of which 15% are located in Mainland China, to map where their products or services were sourced from and to understand more about their procurement practices. The study is expected to be completed by the end of 2023. CLP will then analyse the results and decide the next steps.' However, no evidence was found of public disclosure of verified mapping of the Company's full solar supply chain at the time this research was conducted. With regard to its Australian subsidiary it states that 'It also has stringent processes in place that are regularly reviewed to identify where risks of modern slavery exist within its business. The process includes surveying its suppliers by asking a range of questions relating to suppliers' knowledge of their supply chain; organisational policies, including modern slavery; countries from which the products or services were sourced from; the country in which they are headquartered; awareness of allegations of modern slavery in their operations, industry or supply chain; organisational size; and whether they screen suppliers in their supply chain for modern slavery risks.' However, this only applies to the suppliers of the subsidiary. Moreover, it is unclear if this information is publicly disclosed and independently verified. <a href="#">[CLP Holdings' response]</a></li> </ul>
M(0).2	<p>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). The company indicates that this information is relevant to all destination markets.</p> <p>•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 &amp; 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.”</p>	0	<ul style="list-style-type: none"> <li>• Not Met: Referring to the research report published by Sheffield Hallam University the Company states that 'We confirm that the CLP Group had business with four suppliers since they were identified in the report in 2021. We have taken actions to address this.' However, no further information was found on what these actions have been and how they meet the requirements of this indicator. <a href="#">[CLP Holdings' response]</a></li> </ul>

## 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<sup>‡</sup> are not included for this year's Benchmark. As such this scorecard should be seen as a reflection of feedback received as of September 2023<sup>§</sup>.

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 2023 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 electric utilities 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.

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<sup>‡</sup> Cut-off dates: 30 June 2023 for companies that did not engage with the benchmark; the expiration of the feedback period (between Aug/Sep 2023) for companies that engaged with the benchmark.

<sup>§</sup> Further outreach and engagement with a subset of companies on the specific issue of exposure to forced labour risks was conducted in October 2023.