

**Renewable Energy & Human Rights Benchmark 2025
Company Profile**

Company name CLP Holdings
Sub-sector Project developer
Overall score 20% weighted average

Section score	Weighting	For section
36%	20%	1. UNGP core indicators
10%	40%	2. Salient human rights risks
0%	10%	3.a Response to risk of exposure to forced labour
N/A	10%	3.b Serious allegations
34%	20%	4. Low Carbon Transition Assessment

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

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

Detailed assessment

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

A. Policy commitments and governance

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • 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: clpgroup.com] • Met: Commitment to UNGPs: See above, the Company is committed to respect rights 'in accordance' with the UNGPs [CLP's Group Labour Standards: clpgroup.com]
A.2	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	1	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Commitment to ILO core principles: 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." However, 'based on' the principles is not considered strong enough wording to indicate commitment. The Company has commitments regarding the different ILO core areas. In relation to Freedom of Association, it states that 'We are committed to recognising employees' rights to freedom of association and respecting relevant

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			<p>processes and laws on collective bargaining'. However, in cases where companies place its commitment in the context of local laws, it is expected that they are committed to allow for alternative mechanisms in those locations where these rights are legally restricted. [CLP's Group Labour Standards: clpgroup.com]</p> <ul style="list-style-type: none"> • Met: Expects business relationships 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, 12/2022: clpgroup.com]
A.3	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to remedy adverse HRs impacts: 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: clpgroup.com] • Not Met: Expects business relationships 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, 12/2022: clpgroup.com] • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms • Not Met: Commitment to work with business relationships on remedy
A.4	Commitment from the top	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Board level responsibility for HRs: 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. [2024 Annual report, 2025: clpgroup.com] & [2024 Sustainability Committee Charter, 01/01/24: clpgroup.com] • Not Met: Describes HRs expertise of Board member • 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: clpgroup.com] • Met: CEO or board incentives: In relation to the annual incentive affecting the CEO's remuneration, the Company indicates that 'there is not a formulaic mathematical determination of performance, rather is a balanced judgement by the HR&RC taking all relevant factors into account'. These factors include 'safety performance: fatalities, Lost Time Injury and Total Recordable Injury Rates'. 'stewardship of other sustainability risks including the social and economic impacts of energy transition, health and wellbeing and diversity and inclusion'. Also 'internal control: number of not satisfactory audits and code of conduct cases'. Annual incentive for the CEO accounted for HK\$M 1.7M [2023 Annual report, 2024: clpgroup.com]
A.5	Responsible lobbying and political engagement fundamentals	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Publicly available policy statement(s) (or policy(ies)) setting out lobbying and political engagement approach.: The Company's policy on political contributions states that 'It 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'. No evidence found of lobbying. [Policy on making political contributions, 08/2022: clpgroup.com] • Met: Monetary value of direct political contributions: The sustainability report indicates that CLP Group made \$0 political contributions to "Lobbying, interest representation or similar," "Local, regional or national political campaigns,

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			<p>organisations or candidates" or "Others (e.g. spending related to ballot measures or referendums)" in the last three years. [2023 Sustainability report, 2024: clpgroup.com]</p> <ul style="list-style-type: none"> • Met: Monetary value of indirect political contributions: It indicates that made contributions of 8,05 HK\$M to 'trade associations or tax-exempt groups (e.g think tanks). [2023 Sustainability report, 2024: clpgroup.com] • Not Met: Requirement for third-party lobbyists to comply with the Company's lobbying and political engagement policy (or policies)

B. Embedding respect and human rights due diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1	Responsibility and resources for day-to-day human rights functions	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Senior responsibility for HRs implementation and decision making: The Company indicates that 'The Sustainability Executive Committee (SEC) has the strategic responsibility of assessing and managing sustainability issues. The SEC is chaired by the Chief Executive Officer (CEO) as part of that role's executive-level responsibility for economic, environmental and social matters'. It has seven members including CEO, CFO, COO, Chief Strategy, Sustainability and Governance Officer, Chief Human Resources Officer and Director - Group sustainability. 'The SEC steers the sustainability strategy of the Group and approves relevant deliverables. The CEO and CFO also hold management responsibilities for the assurance of ESG data, and jointly sign off the General Representation Letter connected with the assurance process'. ESG includes human rights. [2023 Sustainability report, 2024: clpgroup.com] • Met: Describes day-to-day responsibility for implementing HRs commitments: The Company adds that 'The Director-led Group Sustainability Department regularly reports to and seeks guidance from the Sustainability Committee and the SEC. The Department is responsible for managing the implementation of the Group's climate change strategy [...] The Department works to embed sustainability into existing operational practices and to inform the development of CLP's business strategy and planning processes. It monitors sustainability issues and updates the Sustainability Committee and the SEC on emerging risks and opportunities. It also leads corporate sustainability reporting and identifies areas for improving operational performance'. [2023 Sustainability report, 2024: clpgroup.com] • Not Met: Day-to-day resources and expertise allocation in own operations • Not Met: Resources and expertise allocation in supply chain: The 2024 Sustainability Report indicates: 'Procurement and business unit personnel work collaboratively to review and assess the performance of incumbent suppliers in the market. They also monitor sustainability risks in the areas of human rights/modern day slavery, environment and community. These initiatives provide useful information for formulating effective sourcing strategies as well as managing risk and supplier relationships'. However, no further details found on these teams (size, location, specific human-rights related expertise, etc.). [2024 Sustainability Report, 2025: clpgroup.com]
B.2	Identifying human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Describes process of identifying risks in own operations: The 2024 Sustainability Report indicates: 'In 2024, CLP raised the bar by undertaking a comprehensive due diligence process to assess human rights risks across functions and regions in accordance with the United Nations Guiding Principles. This assessment evaluated non-financial impacts in areas like employment practices, environmental concerns, community relations and other stakeholder impacts. Human rights risks were assessed and mapped through extensive desk-based research, based on an analysis of CLP's current human rights management status quo. Interviews with internal stakeholders were conducted to review and gather perspectives on the initial findings with the aim of identifying salient human rights risks for prioritisation'. Identification of impacts is part of its Human rights assessment process. [2024 Sustainability Report, 2025: clpgroup.com] • Met: Describes process for identifying risks in business relationships: The Company indicates: 'In accordance with its Corporate Risk Matrix, CLP conducts ongoing risk profiles monitoring of strategic suppliers with high business criticality and spend value. The profiles are conducted in conjunction with supplier risk management and supplier relationship management processes, and cover risks related to modern slavery, labour practices, supplier continuity, employee health and safety and cyber security. [...] CLP takes a risk-based approach to sustainable procurement across the procurement lifecycle. ESG risks are identified and evaluated regularly at category, project and supplier levels, taking into account

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			<p>responsible procurement practices. This evaluation considers the following risks: Country-specific risks; [...] Labour practices and sub-contracting risks; Health and safety risks. [...] Specifically, the risk profiling process helps CLP manage ESG matters in areas such as labour practices, human rights, modern slavery, child labour, harassment, safety, environment, [...] along the value chain'. [2024 Sustainability Report, 2025: clpgroup.com]</p> <ul style="list-style-type: none"> • Not Met: Describes risk identification system incl. stakeholder consultation: Regarding its due diligence process, the 2024 Sustainability Report indicates: 'Interviews with internal stakeholders were conducted to review and gather perspectives on the initial findings with the aim of identifying salient human rights risks for prioritisation'. However, it is not clear affected stakeholders and internal or independent external human rights experts were involved in the process. [2024 Sustainability Report, 2025: clpgroup.com] • Not Met: Describes how risk identification system is triggered by new circumstances: See above. However, no description found of how its process to identify human rights risks and impacts are triggered by new country operations, new business relationships, new human rights challenges or conflict affecting particular locations. [2024 Sustainability Report, 2025: clpgroup.com]
B.3	Assessing human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes assessment process and discloses salient HRs risks: The 2024 Sustainability Report indicates: 'In 2024, CLP raised the bar by undertaking a comprehensive due diligence process to assess human rights risks across functions and regions in accordance with the United Nations Guiding Principles. This assessment evaluated non-financial impacts in areas like employment practices, environmental concerns, community relations and other stakeholder impacts [...]. Human rights risks were assessed and mapped through extensive desk-based research, based on an analysis of CLP's current human rights management status quo. Interviews with internal stakeholders were conducted to review and gather perspectives on the initial findings with the aim of identifying salient human rights risks for prioritisation'. The process took place across the value chain. However, it is not clear how relevant factors are taken into account, such as geographical, economic, social and other factors. [2024 Sustainability Report, 2025: clpgroup.com] • Met: Describes how process applies to supply chain: The 2024 Sustainability Report indicates: 'In accordance with its Corporate Risk Matrix, CLP conducts ongoing risk profiles monitoring of strategic suppliers with high business criticality and spend value. The profiles are conducted in conjunction with supplier risk management and supplier relationship management processes, and cover risks related to modern slavery, labour practices, supplier continuity, employee health and safety and cyber security. [...] CLP takes a risk-based approach to sustainable procurement across the procurement lifecycle. ESG risks are identified and evaluated regularly at category, project and supplier levels, taking into account responsible procurement practices. This evaluation considers the following risks: Country-specific risks; [...] Labour practices and sub-contracting risks; Health and safety risks. [...] Specifically, the risk profiling process helps CLP manage ESG matters in areas such as labour practices, human rights, modern slavery, child labour, harassment, safety, environment, [...] along the value chain. The risk profiling results provide CLP with insights for developing sourcing strategies and risk mitigation measures for its strategic suppliers in each category'. [2024 Sustainability Report, 2025: clpgroup.com] • Met: Public disclosure of results of HRs risk assessment: See above. It adds: 'A total of 12 salient human rights topics were mapped across CLP's value chain. These topics underwent detailed risk assessments, providing valuable insights for developing risk management measures'. The Company provides a summary of the salient topics identified, and respective level of management systems currently in place across the supply chain, development and construction and operations. The 12 salient human rights topics are: occupational health and safety, forced labour and modern slavery, working conditions, non-discrimination and diversity, child labour and juvenile work, freedom of association and collective bargaining, community impact, health environment, tribal/indigenous people's rights, just transition and responsible decommissioning, grievance mechanisms and access to remedy and privacy and responsible use of technology. [2024 Sustainability Report, 2025: clpgroup.com] • Not Met: Describes how assessment involved affected stakeholders: See above. The 2024 Sustainability Report indicates: 'Interviews with internal stakeholders were conducted to review and gather perspectives on the initial findings with the aim of identifying salient human rights risks for prioritisation'. However, no details

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			found on how affected stakeholders are actually involved in the assessment process. [2024 Sustainability Report, 2025: clpgroup.com]
B.4	Integrating and acting on human rights risks and impact assessments	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes system to prevent, mitigate and remediate HRs issues: Following its due diligence process to assess human rights risks 'action plans were developed to mitigate the identified risks effectively'. It adds: 'Evaluating the mapped human rights impacts enables the identified topics to be prioritised for developing follow up action plans based on their relative saliency. [...] High saliency of a human rights topic means that the topic is particularly prominent due to its potential for negative impact. In the table above, the order of the identified human rights topics in each category is based on the prioritisation of saliency across CLP's value chain. Furthermore, there is an additional layer of analysis of organisational capacity for impact mitigation, which reflects CLP's ability to mitigate salient human rights impacts. This is based on how closely the company is connected to the impact, the level of control over key factors influencing the impact, and current management practices'. However, no description found of how the actions of a global system to prevent, mitigate or remediate its salient human rights issues are actually taken. [2024 Sustainability Report, 2025: clpgroup.com] • Not Met: Describes how global system applies to supply chain: See above. Salient topics were also identified in the supply chain and the procedure described above seems to apply for the entire value chain. However, no description found of how the actions of a global system to prevent, mitigate or remediate its salient human rights issues in its supply chain are actually taken. [2024 Sustainability Report, 2025: clpgroup.com] • Met: Example of actions decided on at least 1 salient HRs issue: Based on the due diligence results, the Company discloses the key highlights and action plans formulated to manage human rights-related risks including: 'Occupational health and safety is identified as the most salient labor rights topic due to the nature and potential workplace hazards in the context of power generation operations, servicing and maintenance of electricity lines, and other similar activities. This aligns with CLP's priorities to have put in place a robust safety management for its own operation. Meanwhile, CLP will also emphasise the management of third-party workforce labor conditions at all CLP sites in the standalone human rights policy.' [2024 Sustainability Report, 2025: clpgroup.com] • Not Met: Describes how stakeholders involved in decisions about actions taken: Following its due diligence process to assess human rights risks 'action plans were developed to mitigate the identified risks effectively. [...] Interviews with internal stakeholders were conducted to review and gather perspectives on the initial findings with the aim of identifying salient human rights risks for prioritisation'. However, no further description found of how it involves affected stakeholders in decisions about the actions to take in response to its salient human rights issues. [2024 Sustainability Report, 2025: clpgroup.com]
B.5	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes system for evaluation effectiveness of actions: The 2023 Sustainability Report states that 'Regular meetings with suppliers are conducted to discuss the progress of mitigation plans and explore opportunities for further improvement'. The 2024 Sustainability Report indicates: 'CLP believes in the importance of minimising any adverse impacts or potential effects on local communities living near CLP's project sites and the third-party contractors working at these locations. Existing processes for engagement activities with contractors and local residents will be further reviewed to ensure proper management of labour conditions, land use, construction activities, as well as the topics mapped with high salient level'. However, no further description found of its system 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. [2023 Sustainability report, 2024: clpgroup.com] & [2024 Sustainability Report, 2025: clpgroup.com] • Not Met: Example of lessons learned from evaluation effectiveness of actions: Regarding one of its action plans formulated to manage human rights-related risks, the 2024 Sustainability Report indicates: 'Given that three community-related and three crosscutting topics have been identified among the 12 salient human rights risks, it has become evident that it is appropriate for CLP to develop a standalone Group-level policy on human rights. This policy will ensure that human rights matters are addressed clearly and comprehensively as part of due diligence efforts. The standalone policy will align with UN Global Compact principles inclusive of just transition elements and taking into account local context. In addition, detailed local implementation strategies will be formulated to ensure

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			robust tracking, assessing and feedback mechanism are in place'. However, in order to meet to requirement, the Company is expected to provide an example of a lesson learned while tracking the effectiveness of an action on at least one of its salient human rights issues. [2024 Sustainability Report, 2025: clpgroup.com] <ul style="list-style-type: none"> • Not Met: Involves stakeholders in evaluation effectiveness of actions: The 2024 Sustainability Report indicates: 'CLP believes in the importance of minimising any adverse impacts or potential effects on local communities living near CLP's project sites and the third-party contractors working at these locations. Existing processes for engagement activities with contractors and local residents will be further reviewed to ensure proper management of labour conditions, land use, construction activities, as well as the topics mapped with high salient level'. However, no description found of how it involves affected stakeholders in evaluation of whether the actions taken have been effective. [2024 Sustainability Report, 2025: clpgroup.com]
B.6	Communication on human rights impacts	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Provides one example of comms with stakeholders: The 2024 Sustainability Report indicates: 'Existing processes for engagement activities with contractors and local residents will be further reviewed to ensure proper management of labour conditions, land use, construction activities, as well as the topics mapped with high salient level'. However, no example found where the Company demonstrates how it communicates with affected stakeholders regarding specific human rights issues raised by the stakeholders or on their behalf. [2024 Sustainability Report, 2025: clpgroup.com] • Not Met: Describes challenges to effective comms and how it is working to address them

C. Remedies and grievance mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	1.5	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all 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: clpgroup.com] • 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: clpgroup.com] • 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: clpgroup.com] • Not Met: Expects business relationships to convey expectation to their business relationships
C.2	Grievance mechanism(s) for external individuals and communities	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Grievance mechanism accessible to all external individuals and communities: 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. [...]" 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>suppliers, we encourage our suppliers to do the same with their upstream suppliers.' However, an expectation for suppliers was not found. The Company has published the 2024 Sustainability Report, however, no evidence of a mechanism accessible to all external individuals and communities found. [Whistleblowing Policy, 10/2021: clpgroup.com] & [CLP's Supplier Code of Conduct, 12/2022: clpgroup.com]</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware • Not Met: Describes how external individuals/communities access grievance mechanism: The supplier code expects 'accessible channels for employees and stakeholders to raise complaints in a confidential manner and without fear of retaliation'. However, the Company differentiates requirements as a 'must' and as 'expectation'. Therefore, it is not clear if this is a mandatory requirement. [CLP's Supplier Code of Conduct, 12/2022: clpgroup.com] • Not Met: Expects business relationships to convey expectation to their business relationships
C.3	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes approach taken to remedy adverse HRs impacts • Not Met: Describes changes to systems, processes and practices to prevent future impacts • Not Met: Describes approach to monitoring/implementing agreed remedy

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

D. Indigenous Peoples' and Affected Communities' Rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.PD	Commitment to respect indigenous peoples' rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to respect indigenous peoples' rights with explicit reference to UN Declaration • Not Met: Description of process for identifying indigenous persons and customary lands. • Not Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources • Not Met: Commitment to FPIC
D.2.PD	Engagement with all affected communities	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Describes how local communities identified and engaged in the last two years: The Company has a stakeholder engagement framework: 'Each business unit develops its own project-specific engagement plan according to their needs, based on the framework steps below. 1) establishing engagement scope and aligning with business objectives; 2) mapping issues and concerns; 3) Identifying relevant stakeholders: CLP engages with a diverse range of stakeholders, each with distinct attributes, concerns and interests. Key stakeholder groups for each project are identified and prioritised based on the issues mapped, how stakeholders will be impacted, and the nature of their influence on the business. 4) Developing a communications and engagement plan [...] 5) conducting engagement activities; 6) Capturing feedback and reporting on outcomes'. [2023 Sustainability report, 2024: clpgroup.com] • Not Met: Provides two examples of engagement with communities: The Company reports in relation to its investments in community initiatives. It includes: a partnership with Morwell Neighbourhood House that is tackling food insecurity in the Latrobe Valley; a contributed to local non-profit initiatives by EnergyAustralia since 2016; a project that promotes arts and culture alongside green living, among others However, no evidence was found on engagement to discuss specific human rights impacts on human rights during last two years. [2024 Sustainability Report, 2025: clpgroup.com] • Not Met: Examples of engagement refer to marginalised groups and provide additional detail • Not Met: The company meets B2.C, B3.D, B4.D and B.5.C
D.3.PD	Benefit and ownership sharing policy	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to identify benefit and ownership sharing • Not Met: Commitment includes right to decide own priorities for communities • Not Met: Disclosure of statistics for each project describing demographics of benefit/ownership sharing • Not Met: Disclosure how affected communities participated in decision-making
D.4.PD	Local wind & solar energy	1.3333	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Actions taken to support access and affordability of renewable energy in the value chain: The Company reports in relation to different initiatives to support communities and renewable energies, such as the Community energy saving fund

Indicator Code	Indicator name	Score (out of 2)	Explanation
	access, affordability		<p>in Hong Kong: 'The subsidies are a part of the community support programmes in 2023 with an allocation of over HK\$200 million from the Community Energy Saving Fund. Additional initiatives include a HK\$20 million scheme to subsidise families living in transitional housing to purchase energy-efficient appliances, and a HK\$5 million project to rewire subdivided units so that individual electricity meters can be installed'. [2022 Climate-related Disclosures Report, 2023: clpgroup.com] & [CLP INFORMATION KIT, 11/2022: clp.com.hk]</p> <ul style="list-style-type: none"> • Met: Public support for government policies addressing energy access: The Company reports that 'CLP Power has worked closely with the Hong Kong SAR Government to promote the development of renewable energy under the Scheme of Control (SoC) Agreement to which a Feed-in Tariff (FiT) Scheme was added in 2018. The scheme is applicable to electricity produced by solar and wind power systems with a generation capacity of up to 1MW. Under the scheme, CLP Power will purchase electricity produced by an approved renewable energy system once it is successfully connected to the Company's power grid. A smart meter is installed to record the amount of electricity generated by the renewable energy system. CLP Power then offers a FiT rate ranging from HK\$2.5 to HK\$4 per unit of electricity. By the end of 2023, 376MW of renewable energy was approved under the Scheme, amounting to the annual electricity usage of 89,700 residential customers. This FiT Scheme, offering attractive financial incentives, is further promoting the adoption of renewable energy by customers'. [2022 Sustainability Report, 2023: clpgroup.com] • Not Met: Including a timebound actions plan and reporting targets

E. Land and resource rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
E.1.PD	Respect for land and natural resource tenure rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Policy commitment to respect land ownership/natural resources • Not Met: Identification of legitimate tenure rights holders • Not Met: Extends expectation to business relationships • Not Met: Steps taken to use leverage to resolve land rights issues or disclosure that no such issues arose
E.2.PD	Just and fair physical and economic displacement policy implementation including free, prior and informed consent	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to follow IFC PS 5 for physical and economic displacements • Not Met: Description of compensation for resettlement • Not Met: Publishes statistics on numbers affected by relocations (current and planned projects) • Not Met: Publishes regular reviews of living conditions after relocation OR description of approach to physical and economic displacement

F. Security and conflict-affected areas

Indicator Code	Indicator name	Score (out of 2)	Explanation
F.1.PD	Operating in or sourcing from conflict-affected areas	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to heightened HRDD in conflict affected areas • Not Met: Steps taken to assess and mitigate these risks with conflict sensitive lens • Not Met: How stakeholders are involved in the process to mitigate risks
F.2.PD	Evidence of security provider human rights assessments	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Description of implementation of security approach and example: The 2024 Sustainability Report indicates: 'As part of the Group's overall sustainability management, the Board-level Sustainability Committee (SusCom) maintains oversight of nature-related impacts, risks and opportunities and has a role in evaluating the adequacy and effectiveness of CLP's Health, Safety and Environment (HSE) Governance Framework and HSE Management System, supported by the CLP Group Health, Safety, Security and Environment (HSSE) Executive Committee. [...]' The CLP Group HSSE Executive Committee, also chaired by the CEO, appoints senior executives to review and evaluate CLP's overall governance, strategy, performance and assurance in Health, Safety, Security & Environment'. However, no description found of how it implements a security approach that ensures respect for human rights in Company managed operations. [2024 Sustainability Report, 2025: clpgroup.com] • Not Met: Description of monitoring of business partners • Not Met: Local communities engaged in assessment of security • Not Met: Example of working with community on this issue

G. Responsible mineral sourcing

Indicator Code	Indicator name	Score (out of 2)	Explanation
G.1.PD	Responsible sourcing of minerals: arrangements with suppliers	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Statement on OECD Guidance aligned due diligence: The 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. The Company has published an updated version of its Sustainability Report, however, no commitment to follow the OECD Guidance was found. [2022 Sustainability Report, 2023: clpgroup.com] & [2024 Universal Registration Document, 45729: engie.com] • Not Met: The policy explicitly covers all minerals • Not Met: Policy expectations of suppliers • Not Met: Contractual requirement for smelters/refiners to follow OECD
G.2.PD	Responsible sourcing of minerals: mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Identification and mapping of suppliers • Not Met: Traceability system for mineral supply chain • Not Met: Discloses smelters/refiners that are most significant part of supply chain • Not Met: Suppliers in higher risk activities, geographies, products
G.3.PD	Responsible sourcing of minerals: risk identification in mineral supply chains	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Identification and prioritising of risks in supply chain • Not Met: Expectation on suppliers to disclose • Not Met: Processes cover minerals assessed as highest risk

H. Protection of human rights and environmental defenders

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.1.PD	Health and safety	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: The Company describes the process(es) it has in place to identify its health and safety risks and impacts: The HSE management system document includes mandatory steps including, among others 'Develop and implement a health risk assessment (HRA) process or equivalent that identifies and assesses health hazards and potential impact groups or individuals in CLP controlled operations; Communicate to workers the identified health hazards and corresponding controls in the work activities; Develop and implement an ongoing monitoring and protection program to assess and control the exposure of physical, biological and chemical hazards found within the CLP controlled operation for identified groups or individuals'. [2022 Sustainability Report, 2023: clpgroup.com] • Met: Discloses quantitative information on H&S in own operations (injury rate or lost days and fatalities) in last reporting period: The Company reports absolute and relative figures on fatalities for the last reporting period (0), Lost Time due to injury (0.14), total recordable injury (0.24) and work-related ill health (0). [2024 Sustainability Report, 2025: clpgroup.com] • Met: Expects disclosure of H&S information of relevant business relationships: The supplier code has expectations regarding suppliers including 'continuously monitoring health and safety performance and regularly disclosing the progress to CLP and wider stakeholders' [CLP's Supplier Code of Conduct, 12/2022: clpgroup.com] • Not Met: Targets for H&S performance (including injury rates or lost days and fatalities): The Company explains the HSE [Health, Safety and Environment] strategy and some of the actions carried out: 'In 2024, there were no fatalities or

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>actual Serious Injury and Fatality (SIF) events. The total number of SIF events decreased by 29% from 55 in 2023 to 41 in 2024. Notably, 31 of the SIF events in 2024 were classified as SIF observations, where intervention occurred before any control was lost. [...] There has been a decline in our overall lost time injury rate (LTIR) and total recordable injury rate (TRIR) performance compared to 2023. [...] A significant observation within our LTIR and TRIR metrics includes a mixture of lower impact incidents such as twisted ankles, being struck by doors, and tripping, alongside more damaging events like serious lacerations and fractures'. It adds: 'CLP continued to address serious injury and fatality risks, with a particular focus on gravitational energy, guided by a shift in approach to find improved ways of working across its operations. Businesses across the Group are implementing HSE measures guided by approaches based on principles of learning from normal work (LFNW) and human and organisational performance (HOP) [...]. These guiding principles are tailored to specific local business unit needs and backed by training and learning resources for employees. Additionally, in 2024, CLP introduced a new CEO HSE Award category, the "Fatality Prevention Award" to ensure its sustained attention and promote learning across business units. [...] Progress continues on implementing the HSE risk management platform Enablon [...]. In 2024, the team successfully delivered the following modules, which are now operational: Management of Change (MOC), Occupational Health, Ergonomics Analysis (DSE), Management System Assurance and Independent Assurance Assessment. The CLP China team is now also using this platform. [...] The Group remains dedicated to enhancing the safety of its people during daily operations. Major progress has been made both by adopting technology and redesigning systems work approaches. [...] CLP China inaugurated a Safety Skills Practical Training Centre to address business needs for both staff and contractors'. Although the Company discloses information on work being done to improve its health and safety management systems, no targets related to injury rates or lost days (or near miss frequency rate) and fatalities for the last reporting period were found. [2024 Sustainability Report, 2025: clpgroup.com]</p>
I.2.PD	Forced labour risk management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Board level oversight over policies on forced labour in supply chain. How relevant stakeholders informed board discussions: There are five Board Committees and 'The two committees most involved in sustainability-related matters are the Sustainability Committee and the Audit & Risk Committee'. According to the TOR for the Sustainability Committee, it has among its duties to review and evaluate the adequacy and effectiveness of the Supplier Code of Conduct. However, no further details found in relation to supply chain oversight including forced labour and how relevant stakeholders informed Board discussions. [2024 Sustainability Committee Charter, 01/01/24: clpgroup.com] & [2024 Sustainability Committee Charter, 01/01/24: clpgroup.com] • Not Met: Capacity building with suppliers • 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." • Not Met: Factors to be considered when ending a business relationship incl. responsible disengagement
I.3.PD	Prohibition of forced labour: Wage practices	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Requirements on paying in full and on time in supplier codes and contracts: 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			and full payments. [CLP's Group Labour Standards: clpgroup.com] & [CLP's Supplier Code of Conduct, 12/2022: clpgroup.com] <ul style="list-style-type: none"> • Not Met: Describes work with suppliers on paying workers regularly, in full and on time • Not Met: Assessment scope of failure to pay workers in full and on time in supply chain • Not Met: Employer Pays Principle in policy for own ops and supply chain
I.4.PD	Prohibition of forced labour: Restrictions on workers	0.6667	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Met: Requirements on free movement in supplier codes and contracts and own operations: The Company's group labour standards include commitment 'Ensuring that original copies of employees' identity documents are never withheld'. The supplier code include expectation of observing the CLP's Group Labour standards. [CLP's Supplier Code of Conduct, 12/2022: clpgroup.com] & [CLP's Group Labour Standards: clpgroup.com] • Not Met: Describes working with suppliers on free movement of workers • Not Met: Description of implementation and monitoring of this practice
I.5.PD	Freedom of association and collective bargaining	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • 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. Regarding own operations, Company's labour standards require 'complying fully with all legal requirements regarding union membership and collective bargaining in the countries we operate in'. No further details found beyond legal compliance. [CLP's Supplier Code of Conduct, 12/2022: clpgroup.com] & [CLP's Group Labour Standards: clpgroup.com] • Not Met: Describes work with suppliers on FoA/CB • Not Met: Assessment of scope of restriction of FoA/CB in supply chain • Not Met: Global Framework Agreement
I.6.PD	Living wage (in supply chains)	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • 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, 12/2022: clpgroup.com] • Not Met: Describes work with suppliers on living wage • Not Met: Description of process to determine living wages with unions: The 2024 Sustainability Report indicates: 'With the launch of its refreshed performance management system, in 2024, CLP further strengthened its wage communications with employees in Hong Kong and placed greater emphasis on the linkage between rewards and performance. CLP regularly reviews its remuneration policies and practices to ensure competitive and fair pay. This is achieved through independent external assessments of job size and complexity together with external pay range benchmarking, allowing pay differentials to reflect only each employee's experience, performance and certain market factors. Performance and pay outcomes are reviewed internally and externally for gender bias and differences in the average pay between females and males are moderate [...]. CLP offers entry-level salaries that are well above statutory minimums, demonstrating our commitment to providing wages that support employees and their families.' However, it is not clear whether the Company is paying and defining living wage. Also, not clear whether it is involving unions or equivalent worker bodies in revision. [2024 Sustainability Report, 2025: clpgroup.com]

J. Right to a healthy and clean environment

Indicator Code	Indicator name	Score (out of 2)	Explanation
J.1.PD	Environmental impact assessment and remediation	0.6667	The individual elements of the assessment are met or not as follows:

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Conducts EIA 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." [2022 Sustainability Report, 2023: clpgroup.com] • Not Met: Publishes EIA for renewable energy projects • Not Met: Explains when CIA is conducted
J.2.PD	Life cycle assessment	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Expectation for suppliers to conduct regular public life cycle assessments • Not Met: Requires suppliers to have action plans to address adverse impacts identified

K. Transparency and anti-corruption

Indicator Code	Indicator name	Score (out of 2)	Explanation
K.1.PD	Anti-corruption due diligence and reporting	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to prohibiting bribes to public officials: 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'. However, no explicit reference was found to public officials. [CLP Code of Conduct, 04/2021: clpgroup.com] • Not Met: Expectation extends to relevant business relationships: The CLP's Supplier Code of Conduct requires suppliers to 'Have 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. [...] However, no evidence was found of expectation of suppliers not committing bribery including public officials, relatives or associates, including through business intermediaries. [CLP's Supplier Code of Conduct, 12/2022: clpgroup.com] • Not Met: Reports on any complaints on corruption and bribery: The 2024 Sustainability Report indicates: 'In 2024, 31 breaches of the Code of Conduct were reported. None were financially or operationally material to the Group, and none involved employees at the grade level of senior manager and above. In addition, there were no convicted cases of corruption. [...] Regarding whistleblowing cases, 20 cases were received in 2024 [...].Between 2020 and 2024, CLP did not have any breaches related to six Code of Conduct principles, namely Political Contributions, Gift & Entertainment, Laws & Regulations, Representation, Response to Incidents and Compliance & Report'. However, it is not clear whether any of these breaches or complaints were related to bribery or corruption. [2024 Sustainability Report, 2025: clpgroup.com]
K.2.PD	Payments to governments & contract transparency	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Publishing a tax CbCR in line with GRI 207-4 • Not Met: Disclosure of terms, contracts, agreements for those payments • Not Met: Supports governments to disclose contracts and licenses on renewable energy project in line with EITI

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Disclosure of payments for land purchase made to governments at project-level

L. Diversity, equality and inclusion

Indicator Code	Indicator name	Score (out of 2)	Explanation
L.1.PD	Diversity, equality & inclusion training for management and employees	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Provides mandatory and regular training as per ILO No 190 • Not Met: Requires suppliers to provide training • Not Met: Provides materials and access to resources for trainings • Not Met: The trainings include gender-based violence and the Company's policies and mechanisms for addressing it
L.2.PD	Gender balance and sensitivity	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Timebound action plan to integrate gender lens to all relevant documents including on value chain • Not Met: Demonstrates progress through annual reporting • Not Met: Women and non-binary people make up at least 40% of the Company's executives: Two women out of 14 are part of the executive team, 14%. [2024 Annual report, 2025: clpgroup.com] & [Our Leadership on website, N/A: clpgroup.com] • Not Met: Women and non-binary people make up at least 40% of the Company's board of directors: The Board has five women out of 15 members, 33% [2024 Annual report, 2025: clpgroup.com] & [Our Leadership on website, N/A: clpgroup.com]
L.3.PD	Gender wage gap reporting	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Has closed gender wage gap or timebound commitment: The 2024 Sustainability Report indicates: 'CLP [...] conducts regular reviews to identify any gender pay gaps and to ensure equal pay for work of equal value'. Also: 'EnergyAustralia has maintained its partnership with the Champions of Change Energy coalition and contributed to key initiatives including efforts to close the gender pay gap, strategies to increase female representation in traditionally male-dominated fields and enhancing gender balance within its talent pipeline. Since 2018, EnergyAustralia has continued to maintain a zero gender pay gap across all like for like job roles, reflected in its annual Workplace Gender Equity Agency reporting and analysis.' However, no evidence found it has already closed the gender wage gap or that it has a timebound commitment for closing the gender wage gap across the entire Company. [2024 Sustainability Report, 2025: clpgroup.com] • Not Met: Reports information at company level across multiple pay bands • Not Met: Expects business relationships to do the same

JT. Just transition

Indicator Code	Indicator name	Score (out of 2)	Explanation
JT.1	Fundamentals of social dialogue and stakeholder engagement in a just transition	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Public commitment to engage in social dialogue with appropriate parties for purposes of bipartite or tripartite negotiations • Not Met: Discloses the categories of stakeholders it engages with on a Just Transition and how they were identified.: The 2024 Annual Report indicates: 'the Group is committed to decarbonising its own generation and operation, while supporting customers to reduce their carbon footprint'. Regarding the establishment of a standalone policy on human rights and just transition, the 2024 Sustainability Report notes: 'The standalone policy will align with UN Global Compact principles inclusive of just transition elements and taking into account local context. In addition, detailed local implementation strategies will be formulated to ensure robust tracking, assessing and feedback mechanism are in place.' Also 'CLP recognises its obligations to meet evolving stakeholder expectations around the positive role businesses should play in society. This includes demonstrating leadership in its decarbonisation ambitions, investing in green energy solutions that support the electrification of society and transparently reporting on its ESG performance. [...] Employee and supplier wellbeing is another priority. The Group recognises the importance of ensuring ethical human rights practices in its value chain, as well as of supporting employees and communities impacted by the energy transition.' However, it is not clear the categories of stakeholders it engages with on a just transition. Moreover, the Company is expected to disclose information on how they are identified (at a minimum including workers, unions or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law, and affected

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>stakeholders). [2024 Sustainability Report, 2025: clpgroup.com] & [2024 Annual report, 2025: clpgroup.com]</p> <ul style="list-style-type: none"> • Not Met: Disclosure of steps taken to engage with identified stakeholders and its approach to supporting a just transition. • Not Met: Demonstrates social dialogue and meaningful engagement with stakeholders on all aspects of a just transition.
JT.2	Fundamentals of just transition planning	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Demonstrates how it engages in social dialogue, especially with unions and with stakeholders, in the development of its transition planning.: The 2024 Sustainability Report notes: 'CLP provides comprehensive support to employees whose jobs are affected by business change or restructuring. Support is tailored to individual needs and includes training and skills development, career planning, assistance in redeployment and financial counselling. To this end, CLP has actively engaged with local stakeholders from employee representative organisations and local educational institutions to ensure that study opportunities are available to help meet the needs of its people and the region's new and emerging industries. Following the announcement of the 2028 closure of Yallourn Power Station in 2021, EnergyAustralia implemented the Yallourn Workforce Transition Programme to provide career transition support to employees. The comprehensive support programme includes components covering employee engagement, training, re-skilling and accreditation, financial advice, job search skills and other specialist support'. However, although it mentions that engaged with employee representative organisations, no details were found demonstrating how the Company engages in social dialogue, both with unions and other stakeholders, in the development of a just transition planning. [2024 Sustainability Report, 2025: clpgroup.com] • Not Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on workers. • Not Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on affected stakeholders • Not Met: Sets time-bound and measurable indicators to mitigate social impacts of low carbon transition on business relationships.
JT.3.PD	Fundamentals of creating and providing or supporting access to green and decent jobs for an inclusive and balanced workforce	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Public Commitment to create and provide or support access to green and decent jobs, as part of the low carbon transition.: The 2024 Sustainability Report indicates: 'CLP provides comprehensive support to employees whose jobs are affected by business change or restructuring. Support is tailored to individual needs and includes training and skills development, career planning, assistance in redeployment and financial counselling. To this end, CLP has actively engaged with local stakeholders from employee representative organisations and local educational institutions to ensure that study opportunities are available to help meet the needs of its people and the region's new and emerging industries. Following the announcement of the 2028 closure of Yallourn Power Station in 2021, EnergyAustralia implemented the Yallourn Workforce Transition Programme to provide career transition support to employees. The comprehensive support programme includes components covering employee engagement, training, re-skilling and accreditation, financial advice, job search skills and other specialist support'. However, no evidence found that this entails a commitment to access to green or decent jobs, beyond reskill support. [2024 Sustainability Report, 2025: clpgroup.com] • Met: Assesses and discloses the risk of employment dislocation caused by low carbon transition and related impacts on affected stakeholders.: The Company states that 'As CLP decarbonises its operations, a 'just transition' for its employees — through retraining, repurposing or a supported transition into new roles — will be essential. Failure to do so may negatively impact their economic and personal wellbeing, and those of their dependents'. In particular, 'Failing to provide a 'just transition' for coal-fired power plant employees may result in negative economic, health and social impacts for workers, their families and their communities'. [2023 Sustainability report, 2024: clpgroup.com] • Not Met: Demonstrates measures taken to create and support access to green and decent jobs for affected stakeholders.: The 2024 Sustainability Report indicates: 'Following the announcement of the 2028 closure of Yallourn Power Station in 2021, EnergyAustralia implemented the Yallourn Workforce Transition Programme to provide career transition support to employees. The comprehensive support programme includes components covering employee engagement, training, re-skilling and accreditation, financial advice, job search skills and other specialist support'. No evidence found of measures that explicitly target other

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>affected stakeholders for green jobs opportunities. [2024 Sustainability Report, 2025: clpgroup.com]</p> <ul style="list-style-type: none"> • Not Met: Demonstrates measures taken to ensure green and decent jobs promoting equality of opportunity for women and vulnerable groups
JT.4.PD	Fundamentals of retaining and re- and/or up-skilling workers for an inclusive and balanced workforce	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Public commitment to re-and/or up-skills workers displaced by the transition to a low carbon economy.: The CEO states the following in his letter: 'In response to the changing business environment, it is critical for us to upskill and reskill our people so that we are ready for change'. [2023 Sustainability report, 2024: clpgroup.com] • Not Met: Disclosure of its process(es) for identifying skills gaps for workers and affected stakeholders, in the context of the low carbon transition. • Not Met: Demonstrates measures taken to provide re-and/or upskilling, training or education opportunities for relevant stakeholders.: The 2024 Sustainability Report indicates: 'Following the announcement of the 2028 closure of Yallourn Power Station in 2021, EnergyAustralia implemented the Yallourn Workforce Transition Programme to provide career transition support to employees. The comprehensive support programme includes components covering employee engagement, training, re-skilling and accreditation, financial advice, job search skills and other specialist support'. However, there was no reference to low carbon transition context. No further evidence found. [2024 Sustainability Report, 2025: clpgroup.com] • Not Met: Demonstrates measures taken to ensure that the re-and/or upskilling, training or education opportunities promoting equality of opportunity for women and vulnerable groups.
JT.5.PD	Fundamentals of social protection and social impact management for a just transition	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Discloses contribution to social protection systems for relevant stakeholders, and expectations on business relationships to contribute to social protection of affected stakeholders.: The Company states that 'We seek to improve quality of life for the communities we operate in by supporting initiatives that serve the need of the socioeconomically disadvantaged. This includes, but is not limited to, [...] improving access to healthcare for the underserved; increasing access to healthy food and wellbeing programmes for improving physical and mental health; [...]. In the face of population ageing, we also support programmes that promote an age-friendly community and active aging by equipping senior citizens with the skills that enhance their quality of life. As innovation and technology are key enablers in accelerating global developments to address social needs, we also support initiatives that promote technology-enabled enhancements in living standards'. No further details found, including social protection of workers. [Community initiatives, sponsorship and donation policy, N/A: clpgroup.com] • Not Met: Discloses its processes for identifying impacts of low carbon transition on workers' and affected stakeholders' social protection. • Not Met: Demonstrates contribution to addressing the impact of the low carbon transition on workers' social protection. • Not Met: Demonstrates contribution to addressing the impact of the low carbon transition on affected stakeholders' social protection.
JT.6.PD	Fundamentals of advocacy for policies and regulation on green and decent job creation, employee retention, education and reskilling, and social protection supporting a just transition	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Discloses process(es) for aligning its lobbying activities with policies and regulation supporting the just transition. • Not Met: Discloses where its lobbying activities do not align with policies and regulation that support the just transition. • Not Met: Discloses action plan addressing misalignment of lobbying activities with policies and regulation that support just transition. • Not Met: Demonstrates lobbying for just transition and regulations enabling green and decent jobs, reskilling and/or social protection

3.a Response to risk of exposure to forced labour (10% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(0).0	Serious risks of supply chain forced labour		<ul style="list-style-type: none"> Area: Exposure to high risk of forced labour Story: According to recent data, approximately 35% of the world's polysilicon, and 32% of global metallurgical grade polysilicon, the material from which polysilicon is made, is produced in Xinjiang Uyghur Autonomous Region (XUAR). Investigations by UN bodies, academics and journalists have presented evidence on a number of human rights abuses including the use of forced labour in XUAR. In its July 2022 report to the UN General Assembly, the UN Special Rapporteur on Contemporary Forms of Slavery "regards it as reasonable to conclude that forced labour among Uyghur, Kazakh and other ethnic minorities has been occurring in the Xinjiang Uyghur Autonomous Region of China" and finds that some instances of forced labour in the Region "may amount to enslavement as a crime against humanity". The Special Rapporteur states he "considers that indicators of forced labour pointing to the involuntary nature of work rendered by affected communities have been present in many cases" in the context of "State-mandated systems". Further analysis by independent UN experts concluded that the violations in the Region "may constitute international crimes, in particular crimes against humanity" and have urged China to address their "repeatedly raised concerns about widespread violations of the rights of Uyghurs and other Muslim 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". 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. <p>[United Nations General Assembly, 19/07/2022, "Contemporary forms of slavery affecting persons belonging to ethnic, religious and linguistic minority communities - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences": documents-dds-ny.un.org] [United Nations Special Procedures, 07/09/2022, "Xinjiang report: China must address grave human rights violations and the world must not turn a blind eye, say UN experts": ohchr.org] [International Service for Human Rights, "Repository of United Nations recommendations on human rights in China": ishr.ch] [Business and Human Rights Resource Centre, 02/08/2021, "China: Significant proportion of global solar"]</p>
M(0).1	Publication of independently verified full solar panel supply chains to raw materials level, including names of suppliers and locations for all destination markets	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> Not Met: Public commitment to full solar supply chain transparency: In its response to the BHRRC in 2023, 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. <p>Additionally, in its 2024 Sustainability Report the Company indicates "In accordance with its Corporate Risk Matrix, CLP conducts ongoing risk profiles monitoring of strategic suppliers with high business criticality and spend value. The profiles are conducted in conjunction with supplier risk management and supplier relationship management processes, and cover risks related to modern slavery, labour practices, supplier</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			continuity, employee health and safety and cyber security" However, as it states this only applies to strategic suppliers, so it does not amount to full supply chain transparency. [Business and Human Rights Resource Centre, 14 July 2023, "CLP response": media.business-humanrights.org] [2024 Sustainability Report, 2025: clpgroup.com] • Not Met: Publication of verified full solar supply chains
M(0).2	The company explains steps taken and how these align with steps expected by the UN Guiding Principles (including reference to assessment of severity of risks, leverage, and crucial nature of business relationships)	0	The individual elements of the assessment are met or not as follows: • Not Met: Steps taken aligned with UNGPs: 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. [Business and Human Rights Resource Centre, 14 July 2023, "CLP response": media.business-humanrights.org] • Not Met: Information relevant to all destination markets

3.b Serious Allegations (10% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(1).0	Serious allegation No 1		No allegations meeting the REB severity thresholds under this heading were found

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

Indicator Code	Indicator name	Score (%)	Explanation
n/a	Emissions targets	12.5	<ol style="list-style-type: none"> Has the Company set and disclosed a Scope 1+2 short term target? "The CLP Group commits to reduce scope 1, 2 and 3 GHG emissions from electricity sold 52% per kg CO2e/kWh by 2030 from a 2019 base year. Within that target, the Group commits to reduce scope 1 and 2 GHG emissions from electricity generated 50% per kg CO2e/kWh over the same timeframe." Source: 2024 Sustainability report, page 8. https://www.clpgroup.com/content/dam/clp-group/channels/sustainability/document/sustainability-report/2024/CLP_Sustainability_Report_2024_en.pdf.coredownload.pdf Has the Company set and disclosed a Scope 1+2 long term target set? The company has not set a long-term reduction target for Scope 1 and Scope 2 emissions. Is the Scope 1+2 short term target aligned with a net zero emissions scenario? No, without evidence Is the Scope 1+2 long term target aligned with a net zero emissions scenario? No, without evidence Has the Company set and disclosed a Scope 3 short term target? "The Group also commits to reduce absolute scope 3 GHG emissions from use of sold products 28% by 2030 from a 2019 base year Target NA NA Near-term 3 NA 2019 2030 2021-09-23." Source: SBTI Website, https://sciencebasedtargets.org/target-dashboard#dashboard Has the Company set and disclosed a Scope 3 long term target? No, without evidence Is the Scope 3 short term target aligned with a net zero emissions scenario?

			No, without evidence 8. Is the Scope 3 long term target aligned with a net zero emissions scenario? No, without evidence
n/a	Share of Low Carbon CAPEX	55	Low Carbon CAPEX: "Advancing zero-carbon energy infrastructure investment Throughout the year, CLP focused on investments to accelerate the energy transition. Non-carbon generation assets, transmission, distribution and retail operations accounted for 55% of the Group's capital investments of HK\$19,005 million, on an accrual basis. For 2025-2029, CLP plans to increase the ratio to 77%." Total CAPEX: "Capital investments (HK\$M) 18,773 12,844 16,009 14,163 11,691 Capital expenditure 15,076 11,776 14,553 12,431 10,586 Investments in joint ventures and associates, and additions to intangible assets 674 1,068 1,118 731 909 Acquisitions of businesses / assets 3,023 – 338 1,001 196." Source: 2024 Annual Report. https://www.clpgroup.com/content/dam/clp-group/channels/investor/document/3-3-financial-reports/2024/e_2024%20Annual%20Report.pdf
Final score		34	

Disclaimer

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

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

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

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

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

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

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