

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

Company name Duke Energy
Sub-sector Project developer
Overall score 23 % weighted average

Section score	Weighting	For section
20%	20%	1. UNGP core indicators
8%	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
68%	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	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: General HRs commitment: The Company states that 'Duke Energy respects international human rights principles, including those identified in the United Nations Universal Declaration of Human Rights' [Duke Energy Human Rights Policy Statement, 12/2023: duke-energy.com] • Met: Commitment to UNGPs: The Company states that 'Duke Energy respects international human rights principles, including those identified in the United Nations Universal Declaration of Human Rights and the International Labor Organization's Declaration of Fundamental Principles and Rights at Work within the framework of the United Nations Guiding Principles on Business and Human Rights.' [Duke Energy Human Rights Policy Statement, 12/2023: duke-energy.com]
A.2	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Commitment to ILO core principles: The Company states that 'Duke Energy respects international human rights principles, including those identified in [...] the International Labor Organization's Declaration of Fundamental Principles and Rights at Work' [Duke Energy Human Rights Policy Statement, 12/2023: duke-energy.com] • Not Met: Expects business relationships to commit to ILO core principles: The Company indicates 'Duke Energy's expectations for its suppliers while performing work on behalf of Duke Energy are described in more detail in Duke Energy's Supplier Code of Conduct and include, but are not limited to: [...] Comply with the letter and spirit of applicable labor and employment laws, including those associated with equal opportunity, immigration, child labor, forced, trafficked or

Indicator Code	Indicator name	Score (out of 2)	Explanation
			compulsory labor, the right to collective bargaining and the freedom of association, working hours, wages and benefits, and a harassment-free work environment [...]' In its supplier code of conduct the company further states 'All Duke Energy suppliers must comply with the letter and spirit of applicable U.S. and international labor and employment laws.' However, it is unclear if the Company requires to suppliers to follow the ILO Core principles for fundamental rights at work. It is unclear if it considers international labour laws to take precedent over national labour laws under all circumstances. [Duke Energy Human Rights Policy Statement, 12/2023: duke-energy.com] & [Supplier Code of Conduct, 12/2018: p-cd.duke-energy.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: In its human rights policy statement the Company indicates 'Duke Energy conducts periodic human rights assessments to determine whether its processes and systems used to identify and evaluate human rights concerns are appropriate and assessment findings are integrated into internal mitigation and remediation functions. [...] Employees, suppliers, customers, community members and other stakeholders are encouraged to report concerns without fear of retaliation and may do so anonymously, if desired. All concerns will be thoroughly investigated, and action will be taken, as appropriate. These measures may include, but are not limited to, disciplinary action for employees and enhanced controls to prevent further issues.' However, no statement of commitment to provide remedy for adverse human rights impacts the Company has caused or contributed to. [Duke Energy Human Rights Policy Statement, 12/2023: duke-energy.com] • Not Met: Expects business relationships to make this commitment • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms • Not Met: Commitment to work with business relationships on remedy
A.4	Commitment from the top	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Board level responsibility for HRs: The Company indicates that 'Human Rights activities also are discussed at least annually by the Strategy and Disclosures Committee, and as needed with the Board of Directors.' However, no evidence of a specific board member or board committee was found. [2023 Duke Energy Impact Report, 04/2024: s201.q4cdn.com] • Not Met: Describes HRs expertise of Board member • Not Met: Board member/CEO signal importance of HRs in their communications • Not Met: CEO or board incentives
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 states that 'Duke Energy principles governing corporate political expenditures and Political Action Committee contributions, and engagement of corporate political consultants and external lobbyists: Political expenditures shall reflect the company's interests and not those of its individual officers or directors. No political expenditure shall be made in anticipation of, in recognition of, or in return for any official act. Political expenditure decisions will be made based upon the following principles: promotion of sound and sustainable energy and environmental policies; efficient and effective regulatory systems; and; commitment to our company values of Safety, Integrity and Service.' However, this statement was not made in a formal policy document. [Political Expenditures Webpage, 01/03/2024: duke-energy.com] • Met: Monetary value of direct political contributions: The Company regularly publishes a report on its political expenditure. This report lists any political contribution made, as well as organisation dues. [Corporate Political Expenditure Report July-December 2023: duke-energy.com] • Met: Monetary value of indirect political contributions: see above. [Corporate Political Expenditure Report July-December 2023: duke-energy.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	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Senior responsibility for HRs implementation and decision making: The Company states 'The Legal, Ethics & Compliance, Supply Chain, and ESG teams are actively engaged in our human rights program [...]' The ESG team keeps current on best practices and potential human rights risks in collaboration with Legal. Human rights activities also are discussed at least annually by the ESG Strategy and Disclosure Committee, and as needed with the Board of Directors.' However, no clear statement outlining the senior management responsibly for human rights

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			<p>implementation and decision making could be found. [2023 Duke Energy Impact Report, 04/2024: s201.q4cdn.com]</p> <ul style="list-style-type: none"> • Not Met: Describes day-to-day responsibility for implementing HRs commitments • Not Met: Day-to-day resources and expertise allocation in own operations • Not Met: Resources and expertise allocation in supply chain: The Company states in the Impact Report 2023 that 'The Legal, Ethics & Compliance, Supply Chain, and ESG teams are actively engaged in our human rights program.' However, no clear description of how resources are allocated could be found. [2023 Duke Energy Impact Report, 04/2024: s201.q4cdn.com]
B.2	Identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes process of identifying risks in own operations: The Company indicates that 'We periodically engage third parties to conduct human rights assessments across our enterprise reviewing our practices regarding human rights and sustainability.' However, no description of the process employed to identify human rights risks was found. [2023 Duke Energy Impact Report, 04/2024: s201.q4cdn.com] • Not Met: Describes process for identifying risks in business relationships: The Company states that 'Supplier adherence to Duke Energy's responsible terms and conditions and our Supplier Code of Conduct are conditions of doing business with the company. If a supplier is unable to agree to adhere to the Supplier Code of Conduct, then the supplier must certify that their internal Code of Conduct is substantially similar to, and no less stringent than the principles of our Supplier Code of Conduct. Our Duke Energy Sourcing Standards provide direction on bid events, evaluations and awarded contracts. Duke Energy's supply chain adheres to the Supply Chain Operating Model, Supply Chain Sourcing Standards, Human Rights Policy Statement, Purchasing Controls Policy, Purchasing Authority Policy and Accounts Payable Policy, promoting fair labor practices, ethical principles and financial and regulatory compliance. Suppliers are contractually required to report policy violations to the Supplier Code of Conduct by any party to Duke Energy. In addition, if we receive any reports of potential policy violations, we follow up with the supplier to address the issue.' However, this indicator is looking for a proactive system of risk identification rather than addressing individual cases of non-compliance. [2023 Duke Energy Impact Report, 04/2024: s201.q4cdn.com] • Not Met: Describes risk identification system incl. stakeholder consultation • Not Met: Describes how risk identification system is triggered by new circumstances
B.3	Assessing human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes assessment process and discloses salient HRs risks: The Company indicates that 'Duke Energy conducts periodic human rights assessments to determine whether its processes and systems used to identify and evaluate human rights concerns are appropriate and assessment findings are integrated into internal mitigation and remediation functions. Human rights-related activities are disclosed annually in our Impact Report.' However, it is not clear if this is already being carried out, or if it is an aspiration for the future. Furthermore, it appears that this assessment is used only for the processes an system used where human rights violations are already alleged to have taken place. It is not clear if the Company also applies this to assess human rights risks. [Duke Energy Human Rights Policy Statement, 12/2023: duke-energy.com] • Not Met: Describes how process applies to supply chain • Not Met: Public disclosure of results of HRs risk assessment • Not Met: Describes how assessment involved affected stakeholders
B.4	Integrating and acting on human rights risks and impact assessments	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes system to prevent, mitigate and remediate HRs issues • Not Met: Describes how global system applies to supply chain • Not Met: Example of actions decided on at least 1 salient HRs issue • Not Met: Describes how stakeholders involved in decisions about actions taken
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 • Not Met: Example of lessons learned from evaluation effectiveness of actions • Not Met: Involves stakeholders in evaluation effectiveness of actions

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B.6	Communication on human rights impacts	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Provides one example of comms with stakeholders • Not Met: Describes challenges to effective comms and how it is working to address them

C. Remedies and grievance mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	1	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all workers: The Company indicates that 'Employees, suppliers, customers, community members and other stakeholders are encouraged to report concerns without fear of retaliation and may do so anonymously, if desired.' Channels are available online, via a telephone number, email, and mail. [Duke Energy Human Rights Policy Statement, 12/2023: duke-energy.com] • Not Met: Grievance mechanism available in appropriate languages and workers made aware: The Company indicates that at least the telephone number is 'available 24/7 in English and Spanish and more than 100 other languages' However, no information was found on how the Company ensures all workers are aware of the grievance mechanisms. [Duke Energy Human Rights Policy Statement, 12/2023: duke-energy.com] • Met: Describes how workers in supply chain access grievance mechanism: Workers in the supply chain can report to Duke Energy's grievance mechanism. In future assessments the Company will be expected to demonstrate this applies to all business relationships. [Supplier Code of Conduct, 12/2018: p-cd.duke-energy.com] • Not Met: Expects business relationships to convey expectation to their business relationships
C.2	Grievance mechanism(s) for external individuals and communities	0.5	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all external individuals and communities: The Company indicates that the Ethics line is available to 'Employees, suppliers, customers and other stakeholders can report a human rights concern'. [Duke Energy Human Rights Policy Statement, 12/2023: duke-energy.com] • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware • Not Met: Describes how external individuals/communities access grievance mechanism • Not Met: Expects business relationships to convey expectation to their business relationships
C.3	Remedying adverse impacts	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Describes approach taken to remedy adverse HRs impacts: The Company states in its impact report that it provides remedy mechanisms but no details of the process or approach taken was found. [2023 Duke Energy Impact Report, 04/2024: s201.q4cdn.com] • 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	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Commitment to respect indigenous peoples' rights with explicit reference to UN Declaration: The Company states in its 2023 Impact Report that 'Throughout the clean energy transition, we are focused on environmental justice and a just transition for our customers, workforce and communities – including the consideration of tribal lands and Indigenous peoples. In 2023, less than 1% (.05) of our own operational footprint is located on tribal lands, but that doesn't lessen the importance of our engagement.' However, no public commitment was found to respect the right of indigenous peoples. [2023 Duke Energy Impact Report, 04/2024: s201.q4cdn.com] • 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	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Describes how local communities identified and engaged in the last two years: The Company indicates 'Duke Energy builds relationships with local leaders,

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	affected communities		<p>historically marginalized groups, and the wide range of stakeholders who depend on our service so we can be better equipped to serve changing needs. Through the Duke Energy Foundation, we engage with our local communities to build vibrant economies, enhance climate resiliency and expand justice, equity and inclusion. The vitality of our communities and quality of our relationships are key to the clean energy transition.' However, this indicator is looking for engagement with communities regarding human rights issues that may arise from the Company's operations. The Company further states 'We also incorporate additional due diligence into the siting, technology and design of new potential projects to maximize benefits, including economic to communities while simultaneously reducing environmental impacts. [...] Completion of over 100 initial environmental justice assessments as part of our holistic approach to project development and execution. See the Environmental Compliance section for more details on our siting and due diligence process. These environmental justice assessments help us identify communities with potential environmental justice concerns earlier in the project planning cycle, enhancing our opportunities for collaboration.' However, this does not describe in detail how local communities are identified. [2023 Duke Energy Impact Report, 04/2024: s201.q4cdn.com]</p> <ul style="list-style-type: none"> • Not Met: Provides two examples of engagement with communities • 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: The Company states 'Our transformation for the future is also an important driver of vitality for our customers and our communities. For example, our previous capital plan from 2022 (\$145+ billion) is anticipated to deliver at least \$250 billion in positive economic outputs, and potentially more, from job creation to community investment in the form of property taxes and other local benefits. [...] Customers are also directly supporting accessible and affordable renewables through programs like Clean Energy Connection in Florida. Participating residential and business customers pay a monthly subscription fee to support the construction and operational costs of solar power plants in exchange for credits toward their electricity bills without equipment installation or maintenance. The program also sets aside 26 MW for low-income customers who participate in government subsidy programs or Duke Energy Florida's low-income energy efficiency program. [...] We continue to advance our work with stakeholders in each of our jurisdictions by listening, learning and adjusting. Our Integrated Resource Plans (IRPs) are designed to deliver a beneficial outcome for the community and for the company. Sustaining effective partnership is essential to reliably meet current and future customers' energy needs, while also planning for the companies' longer-term energy transition. In 2023, Duke Energy developed a Carolinas Resource Plan detailing how it can exit from remaining coal in North Carolina and advance a balanced energy portfolio in North Carolina and South Carolina while protecting reliability for customers and communities and providing economic benefits to both states.' In its Climate Report the Company states 'We will incorporate a process to evaluate Duke Energy infrastructure and land for replacement generation, alternative economic development opportunities and/or land restoration to benefit the vitality and well-being as well as the environment of the local community. We will partner with the community to evaluate additional regional economic opportunities that will promote employment and sustainable economic benefit' However, no evidence was found of a commitment found to identify potential ownership sharing options that serve affected communities and Indigenous People. [2023 Duke Energy Impact Report, 04/2024: s201.q4cdn.com] & [2022 Climate Report: duke-energy.com] • Not Met: Commitment includes right to decide own priorities for communities • Not Met: Disclosure of statistics for each project describing demographics of benefit/ownership sharing • Not Met: Disclosure how affected communities participated in decision-making
D.4.PD	Local wind & solar energy access, affordability	1.3333	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Actions taken to support access and affordability of renewable energy in the value chain: The Company states that 'Our business model strategy centers on delivering accessible, reliable and affordable energy to our customers and communities where we operate, while progressing toward cleaner energy to achieve NetZero methane emissions from our natural gas business by 2030 and net-zero carbon emissions from electricity generation by 2050. [...] Customers are also directly supporting accessible and affordable renewables through programs like Clean Energy Connection in Florida. Participating residential and business

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			<p>customers pay a monthly subscription fee to support the construction and operational costs of solar power plants in exchange for credits toward their electricity bills without equipment installation or maintenance. The program also sets aside 26 MW for low-income customers who participate in government subsidy programs or Duke Energy Florida's low-income energy efficiency program.' In its Climate Report it states that 'These strategic priorities are founded on the fundamental customer and community needs for affordable prices, reliability, and a lower carbon dioxide (CO₂ or "carbon") footprint. The transition to clean energy and grid modernization will provide reliability and affordability through (1) taking advantage of decreasing prices and incentives for cleaner sources of energy, (2) replacing aging generating capacity that has increasing operation and maintenance costs, (3) mitigating the impacts of volatile fuel prices and less reliable fuel supplies, and (4) providing greater resilience to weather events' [2023 Duke Energy Impact Report, 04/2024: s201.q4cdn.com] & [2022 Climate Report: duke-energy.com]</p> <ul style="list-style-type: none"> • Met: Public support for government policies addressing energy access: The Company states in its Climate Report that 'Transformation of this scale and scope requires partnering with stakeholders to champion durable public policies at the local, state and federal levels that enable us to transition our generating fleet, expand and adapt our electric grid and natural gas infrastructure, and adopt new carbon-free technologies that will reduce emissions while keeping energy affordable, reliable, and accessible. It is therefore essential for us to engage in public policy discussions – both on our own behalf and through trade associations – to advocate for the interests of our customers, employees, communities and shareholders.' The Company further indicates it has reviewed its memberships in trade associations regarding alignment with the Paris Agreement. It also states that in 2023 it has 'Supported Environmental Protection Agency's (EPA's) interest in a clean energy future and provided comments to EPA's 111 proposal, asking that the proposal (1) aligns with the pace of technology development, demonstration and installation of supporting infrastructure and (2) works diligently to make energy accessible and affordable for our customers.' [2023 Duke Energy Impact Report, 04/2024: s201.q4cdn.com] & [2022 Climate Report: duke-energy.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 Company outlines its approach to both cybersecurity and physical security of their assets. It states that 'The EST is responsible for infrastructure defence and security controls, performing vulnerability assessments and third-party information security assessments, employee awareness and training programs and security incident management [...]. The electric, nuclear power and natural gas sectors are also subject to a range of mandatory regulations and security directives, as well as cybersecurity standards and voluntary guidelines. Each year, Duke Energy

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Corporate Audit Services (CAS) performs various audits of key Duke Energy security systems and functions, such as third-party risk management programs, to assess whether appropriate security controls are in place and operating effectively. We continue to implement advanced security measures for operational technology at our substations, power plants and new grid mechanisms. We regularly communicate and coordinate with peer utilities, industry partners, security organizations and government agencies – including the Department of Homeland Security and the FBI – to share intelligence and best practices.' However, no example of how it ensures respect for human rights in the course of maintaining the security of company managed operations was found. [2023 Duke Energy Impact Report, 04/2024: s201.q4cdn.com]</p> <ul style="list-style-type: none"> • 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 • 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	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: The Company describes the process(es) it has in place to identify its health and safety risks and impacts: The Company indicates that 'Duke Energy is guided by our EHS Management System (EHSMS), which is built upon a Plan-DoCheck-Adjust accountability model. Our EHSMS drives consistency and effectiveness of our EHS activities and is designed to reduce adverse impacts to employees and the environment. The EHSMS facilitates critical planning processes that are important for having a comprehensive understanding of applicable safety risks that need to be mitigated. [...] In 2023, we accelerated integration of EEI's Safety Classification and Learning (SCL) module tactics, embedding them into our incident investigation and reporting processes. The SCL model was created by an integrated team of academic and industry professionals and is designed to prevent serious injuries and fatalities through identification of high energy hazards and mitigation measures.' However, no description of the process in place to identify health and safety risks was found. [2023 Duke Energy Impact Report, 04/2024: s201.q4cdn.com] • Met: Discloses quantitative information on H&S in own operations (injury rate or lost days and fatalities) in last reporting period: The Company states in its 2023

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			<p>Impact Report that 'For the ninth straight year, we expect to maintain our industry leading performance as measured by the Total Incident Case Rate (TICR), which was 0.31 in 2023. We experienced nine serious employee injuries across our operations.' The Company further reports zero fatalities. [2023 Duke Energy Impact Report, 04/2024: s201.q4cdn.com]</p> <ul style="list-style-type: none"> • Not Met: Expects disclosure of H&S information of relevant business relationships • Not Met: Targets for H&S performance (including injury rates or lost days and fatalities): The Company indicates that 'Our goal is to achieve an injury free workplace and to deliver event-free operations'. However, according to its disclosures the Company has not met this target in the last reporting period. No explanation of why the target was missed was found. [2023 Duke Energy Impact Report, 04/2024: s201.q4cdn.com]
I.2.PD	Forced labour risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Board level oversight over policies on forced labour in supply chain. How relevant stakeholders informed board discussions: The Company states that it 'The Legal, Ethics and Compliance, Supply Chain, and other cross-functional teams are actively engaged in our Human Rights program. Human Rights concerns are escalated through the existing grievance mechanism channels, to HR, management, the Ethics Office or EthicsLine. Supply Chain enforces and upholds our policies and practices daily while coordinating with suppliers and contingent workers, and Ethics and Compliance provides oversight and remedy mechanisms to protect and respect human rights. An enterprise wide cross functional team stays current on best practices and potential human rights risks in collaboration with Legal. Human Rights activities also are discussed at least annually by the Strategy and Disclosures Committee, and as needed with the Board of Directors.' However, no evidence was found of a specific board member or board committee tasked with oversight over policies on forced labour in the supply chain. Furthermore, no evidence was found of relevant stakeholder input informing the board discussions. [2023 Duke Energy Impact Report, 04/2024: s201.q4cdn.com] • Not Met: Capacity building with suppliers • Not Met: Discloses ongoing efforts to prevent and mitigate forced labour in own ops and supply chain • 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: The Company indicates that 'Suppliers must compensate workers in a manner that meets all legal requirements associated with wages [...] and benefits.' However, no requirement to pay workers in full and on time in all circumstances was found. [Supplier Code of Conduct, 12/2018: p-cd.duke-energy.com] • Not Met: Describes work with suppliers on paying workers regularly, in full and on time • Not Met: Assessment scope of failure to pay workers in full and on time in supply chain • Not Met: Employer Pays Principle in policy for own ops and supply chain
I.4.PD	Prohibition of forced labour: Restrictions on workers	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Requirements on free movement in supplier codes and contracts and own operations • Not Met: Describes working with suppliers on free movement of workers • Not Met: Description of implementation and monitoring of this practice
I.5.PD	Freedom of association and collective bargaining	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment on FoA/CB and requirements in suppliers codes and contracts: The Company states that 'We have collective bargaining relationships with 15 different local labor unions. We have a grievance process in place for our represented employees and each collective bargaining agreement allows for a review of various employment actions through this formal process. The Employee Rights Under National Labor Relations Act notice is posted in our locations and available online with our Human Relations policies. We fully support freedom of association as described by the International Labour Organization's Declaration on

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Fundamental Principles and Rights at Work' It further states in its supplier code of conduct 'workers must be allowed to join or not join any association as protected by law.' However, it is not clear whether this includes the protection of the rights to FoA and CB under all circumstances. Furthermore, no statement requiring the suppliers to prohibit retaliation and harassment against workers who are members or representatives of trade unions or equivalent worker bodies was found. [Supplier Code of Conduct, 12/2018: p-cd.duke-energy.com] & [2023 Duke Energy Impact Report, 04/2024: s201.q4cdn.com]</p> <ul style="list-style-type: none"> • Not Met: Describes work with suppliers on FoA/CB • Not Met: Assessment of scope of restriction of FoA/CB in supply chain: The Company discloses its 'Collective bargaining unit members as percent of workforce' to have been 18.7% in 2023. However, no assessment of the of the number affected by restrictions to freedom of association or collective bargaining in its supply chain was found. [2023 Duke Energy Impact Report, 04/2024: s201.q4cdn.com] • Not Met: Global Framework Agreement
I.6.PD	Living wage (in supply chains)	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Requirements on living wage in supplier codes and contracts: In its Supplier Code of Conduct it states that 'Suppliers must compensate workers in a manner that meets all legal requirements associated with wages'. However, as stated above, national wage requirements are not always equivalent to a living wage. [Supplier Code of Conduct, 12/2018: p-cd.duke-energy.com] • Not Met: Describes work with suppliers on living wage • Not Met: Description of process to determine living wages with unions: The Company states in its Human Rights Statement that it recognises its role to 'Provide [...] wages [...] in compliance with applicable laws and regulations' and 'Engage and collaborate with the workforce respectfully and Commit to respect the principle of freedom of association and the right to collective bargaining consistent with applicable laws and practice.' However, it cannot be assumed that national wage regulations always guarantee a living wage. [Duke Energy Human Rights Policy Statement, 12/2023: duke-energy.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	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Conducts EIA for renewable energy projects • 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 Company states in the Code of Ethics: 'We comply with U.S. and international anti-corruption laws, including the Foreign Corrupt Practices Act (FCPA). We do not offer or accept bribes, kickbacks, illegal gratuities or similar payments, and we will never punish an employee for refusing to pay a bribe, even if it results in lost business. In addition, our prohibition against corrupt payments and activities includes bribes, kickbacks, or facilitation payments offered or made to individuals in the private sector or domestic public officials' However, no reference was found to family members or associates of public officials or employees of business partners. [Code of Business Ethics, 03/10/2016: p-cd.duke-energy.com] • Not Met: Expectation extends to relevant business relationships: The Company indicates that 'Suppliers must comply with the letter and spirit of applicable U.S. and international laws, including those prohibiting bribery, kickbacks, corruption and other unethical business practices intended to obtain an improper advantage.' However, as above, this statement is not sufficient to meet the requirements of this indicator. [Supplier Code of Conduct, 12/2018: p-cd.duke-energy.com] • Not Met: Reports on any complaints on corruption and bribery

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: No disclosure of payments made at project level was found. [2023 Duke Energy Impact Report, 04/2024: s201.q4cdn.com] • Not Met: Disclosure of terms, contracts, agreements for those payments • Not Met: Supports governments to disclose contracts and licenses on renewable energy project in line with EITI • Not Met: Disclosure of payments for land purchase made to governments at project-level

L. Diversity, equality and inclusion

Indicator Code	Indicator name	Score (out of 2)	Explanation
L.1.PD	Diversity, equality & inclusion training for management and employees	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Provides mandatory and regular training as per ILO No 190: The Company states that 'Employees are required to complete ethics training in their first 30 days on the job, as well as an annual ethics refresher and compliance training based on their role. Each year, all employees are also required to acknowledge their responsibility to comply with the Code of Business Ethics and confirm their obligation to report violations of laws, rules or company policies.' The Code of Conduct includes the commitment to not tolerate discrimination. However, no evidence of a training specifically targets towards diversity, equality and inclusion was found. [2023 Duke Energy Impact Report, 04/2024: s201.q4cdn.com] • Not Met: Requires suppliers to provide training • Not Met: Provides materials and access to resources for trainings • Not Met: The trainings include gender-based violence and the Company's policies and mechanisms for addressing it
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: The Company discloses that in 2023 52 Executive/Senior-Level Officials were female while 115 were male. This is less than 40%, thereby not meeting the requirement under this indicator. [2023 Duke Energy Impact Report, 04/2024: s201.q4cdn.com] • Not Met: Women and non-binary people make up at least 40% of the Company's board of directors: The Company states that '7 out of 14 director nominees are female or identify as part of a minority group.' However, is unclear if the term 'minority group' refers to gender in this context. [2023 Duke Energy Impact Report, 04/2024: s201.q4cdn.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 • 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. • 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	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Demonstrates how it engages in social dialogue, especially with unions and with stakeholders, in the development of its transition planning.: The Company states 'Our approach to the just transition relies on constant communication with our employees. Understanding employee needs through transparent and frequent conversations has steered Duke Energy toward equitable solutions to unavoidable shifts in the workforce, particularly as we phase out coal plants. Overall, we have been able to find an opportunity for most Duke Energy employees who would like to stay with the company, and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>our skills-based development programs have contributed to this success. [...] Duke Energy collaborates with union leadership where employees are represented to develop employee transition plans.' [The Just Transition Approach: p-micro.duke-energy.com]</p> <ul style="list-style-type: none"> • Not Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on workers. • Not Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on affected stakeholders • Not Met: Sets time-bound and measurable indicators to mitigate social impacts of low carbon transition on business relationships.
JT.3.PD	Fundamentals of creating and providing or supporting access to green and decent jobs for an inclusive and balanced workforce	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Public Commitment to create and provide or support access to green and decent jobs, as part of the low carbon transition.: The Company states that ' Fundamental to our transformation is our commitment to enable sustainable career opportunities and build a talented, diverse workforce across the communities we serve. We will support the workforce needed to safely run and maintain the plants through retirement. Additional support for employees affected by our clean energy transformation will include providing assistance to pursue new career paths, including re-skilling and internal placement opportunities and, if needed, external career transition support.' [The Just Transition Approach: p-micro.duke-energy.com] • Not Met: Assesses and discloses the risk of employment dislocation caused by low carbon transition and related impacts on affected stakeholders. • Met: Demonstrates measures taken to create and support access to green and decent jobs for affected stakeholders.: The Company states that ' Fundamental to our transformation is our commitment to enable sustainable career opportunities and build a talented, diverse workforce across the communities we serve. We will support the workforce needed to safely run and maintain the plants through retirement. Additional support for employees affected by our clean energy transformation will include providing assistance to pursue new career paths, including re-skilling and internal placement opportunities and, if needed, external career transition support.' [The Just Transition Approach: p-micro.duke-energy.com] • 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	1	<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 Company states 'Fundamental to our transformation is our commitment to enable sustainable career opportunities and build a talented, diverse workforce across the communities we serve. We will support the workforce needed to safely run and maintain the plants through retirement. Additional support for employees affected by our clean energy transformation will include providing assistance to pursue new career paths, including re-skilling and internal placement opportunities and, if needed, external career transition support.' [The Just Transition Approach: p-micro.duke-energy.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. • Met: Demonstrates measures taken to provide re-and/or upskilling, training or education opportunities for relevant stakeholders.: The Company presents the example of the closing of the Gallagher Station in Floyd County, Indiana: 'At the time of its closure, the Gallagher Station facility had 24 employees. Duke Energy worked with each employee to identify their preferred transition plan, whether that was continued employment with the company in a different location or retirement. Duke Energy's goal with this facility retirement was to help every employee who wanted to continue working for the company to find other opportunities wherever possible as part of a just transition. Ultimately, more than half of the Gallagher Station employees transitioned to other jobs within Duke Energy. Many other employees chose to retire when the plant ceased operations. Some employees chose to continue working for the decommissioning and deconstruction team for a defined period of time.'" [The Just Transition Approach: p-micro.duke-energy.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.

Indicator Code	Indicator name	Score (out of 2)	Explanation
JT.5.PD	Fundamentals of social protection and social impact management for a just transition	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Discloses contribution to social protection systems for relevant stakeholders, and expectations on business relationships to contribute to social protection of affected stakeholders. • Not Met: Discloses its processes for identifying impacts of low carbon transition on workers' and affected stakeholders' social protection. • Not Met: Demonstrates contribution to addressing the impact of the low carbon transition on workers' social protection. • Not Met: Demonstrates contribution to addressing the impact of the low carbon transition on affected stakeholders' social protection.
JT.6.PD	Fundamentals of advocacy for policies and regulation on green and decent job creation, employee retention, education and reskilling, and social protection supporting a just transition	0.5	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Met: Discloses process(es) for aligning its lobbying activities with policies and regulation supporting the just transition.: The Company demonstrates it has conducted an assessment of alignment of its trade association memberships with the Paris Agreement. [2023 Duke Energy Impact Report, 04/2024: s201.q4cdn.com] • 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". Duke Energy 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 panel supply chain is in Xinjiang"]</p>
M(0).1	Publication of independently verified full solar panel	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Public commitment to full solar supply chain transparency: In response to the BHRRC in 2021, the Company states that "We have talked directly with vendors to certify the materials we have procured from them do not contain

Indicator Code	Indicator name	Score (out of 2)	Explanation
	supply chains to raw materials level, including names of suppliers and locations for all destination markets		materials from the Xinjiang region. In addition, we have focused our spend away from vendors that present heightened Xinjiang risk, both for the CBP risk, and unrelated tariff risks, by limiting our solar panel providers to two manufacturers (First Solar and Canadian Solar) until at least 2027, which we will then reassess." However, this does not indicate a full transparent mapping of the Company's full solar supply chain. No further information was found in the company's recent disclosures. [Business and Human Rights Resource Centre, 17/07/2023, "Duke Energy's response": media.business-humanrights.org] • 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: In response to the BHRRC in 2021, the Company states that "We have proactively discussed the forced labor issues with all current battery and solar panel suppliers to ensure they are not sourcing materials from Xinjiang region. In 2021, we changed our terms and conditions to ensure that suppliers affirm they are not sourcing materials from Xinjiang." However, the statement is not sufficient evidence for full, verified disengagement. In addition, no information was found on whether the Company has conducted an assessment of severity of risks, leverage and crucial nature of business relationships. [Business and Human Rights Resource Centre, 17/07/2023, "Duke Energy's 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	50	<ol style="list-style-type: none"> Has the Company set and disclosed a Scope 1+2 short term target? "Reduce Scope 1 CO2 emissions from electric generation 50% from 2005 by 2030." Source: 2023 Impact Report page 15. https://s201.q4cdn.com/583395453/files/doc_downloads/2024/05/impact-report-2023-final.pdf Has the Company set and disclosed a Scope 1+2 long term target set? "Reduce Scope 1 CO2 emissions from electricity generation by 80% from 2005 by 2040." Source: 2023 Impact Report page 15. https://s201.q4cdn.com/583395453/files/doc_downloads/2024/05/impact-report-2023-final.pdf Is the Scope 1+2 short term target aligned with a net zero emissions scenario? No Is the Scope 1+2 long term target aligned with a net zero emissions scenario? No Has the Company set and disclosed a Scope 3 short term target? "Reduce Scope 2 and Scope 3 upstream and downstream emissions 50% by 2035." Source: 2023 Impact Report page 15. https://s201.q4cdn.com/583395453/files/doc_downloads/2024/05/impact-report-2023-final.pdf Has the Company set and disclosed a Scope 3 long term target? "Reduce Scope 3 upstream emissions from the procurement of fossil fuels used for generation to net zero by 2050 [.]Reduce Scope 3 upstream CO2 and

			<p>methane emissions from purchased natural gas to net zero by 2050 [.] Reduce Scope 3 emissions from power purchased for resale to net zero by 2050[.]Reduce Scope 3 downstream emissions from customer use of natural gas to net zero by 2050.” Source: 2023 Impact Report page 15 & 16. https://s201.q4cdn.com/583395453/files/doc_downloads/2024/05/impact-report-2023-final.pdf</p> <p>7. Is the Scope 3 short term target aligned with a net zero emissions scenario?</p> <p>No</p> <p>8. Is the Scope 3 long term target aligned with a net zero emissions scenario?</p> <p>No</p>
n/a	Share of Low Carbon CAPEX	86	<p>Low Carbon CAPEX: “Progressing toward a low-carbon future is a critical global responsibility across industries to slow the impacts of climate change. Those impacts include physical changes that can impact our business strategy and, as such, are also considered in our value chain transition planning. While maintaining a focus on accessibility, reliability and affordability, we are leading one of the largest clean energy transitions in North America. One of the ways we plan to achieve our transition is through our \$170 billion to \$180 billion planned capital investment over the next 10 years, with \$73 billion of that over the next five years. Of the \$170 billion to \$180 billion, 86% of the 10-year investment is dedicated to fleet transition and modernizing the grid to make it more resilient and better equipped to support cleaner energy sources.”</p> <p>Total CAPEX: “Capital expenditures 12,604 Years Ended December 31, 2023 in millions.”</p> <p>Sources: 2023 Impact Report https://s201.q4cdn.com/583395453/files/doc_downloads/2024/05/impact-report-2023-final.pdf and 2024 Annual Report and form 10-K https://d18rn0p25nwr6d.cloudfront.net/CIK-0001326160/e18d1b2c-d502-43be-871b-dbe6f401da6f.pdf</p>
Final score		68	

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

* 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.

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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