Company name: EDF Renewables
Sub-sector: Project developer
Overall score: 29.2% weighted average

Section score | Weighting | For section
--- | --- | ---
52.9% | 20% | 1. UNGP core indicators
23.5% | 40% | 2. Salient human rights risks
2.1% | 20% | 3. Serious allegations
43.8% | 20% | 4. ACT assessment as conducted by the World Benchmarking Alliance

Please read the disclaimer at the end of this scorecard and refer to the full methodology when perusing this scorecard. The methodology as well as additional analysis can be found here: business-humanrights.org

The use of the label “Not met” in the research does not necessarily mean that the company does not meet the requirements as they are described in the accompanying bullet point short text. Rather, it means that the analysts could not find information in public sources that met the requirements as described in full in the 2023 Renewable Energy & Human Rights Methodology document. It is possible that a Company meets the criteria without yet publishing the relevant evidence of doing so. This may include cases where a company has claimed to meet the criteria in the engagement phase or otherwise but where the public record was still not sufficient to meet the criteria by the relevant cut off dates.

### Detailed assessment

1. **UNGP core indicators based on the 2022 CHRB methodology (20% of total)**

#### A. Policy commitments and governance

<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
</table>
| A.1.1 | Commitment to respect human rights | 2 | The individual elements of the assessment are met or not as follows: Score 1  
  • Met: General HRs commitment: The EDF Group's commitment and requirements document states that 'The EDF group tolerates no violations of human rights or fundamental freedoms, in any of its activities, and strives to enforce this principle in all activities carried out by third parties when those activities are included in the scope of the Group’s business relationships. The EDF group is committed to complying, and expects its business relations to comply, as a minimum, with the international standards regarding protection and defence of human rights and fundamental freedoms, in particular including the United Nations International Bill of Human Rights and the International Labour Organization’s eight Fundamental Conventions.' [The EDF group’s commitments and requirements, 03/2021: edf.fr]  
  • Met: International Bill of Human Rights: See above.  
  Score 2  

* For information on the ACT methodology and scoring criteria please refer to the World Benchmarking Alliance.
<table>
<thead>
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</tr>
</thead>
</table>
| A.1.2.a       | Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work | 2               | The individual elements of the assessment are met or not as follows: Score 1  
  • Met: Commitment to ILO core principles: The EDF Group’s commitments and requirements document states: 'The EDF group is committed to complying, and expects its business relations to comply, as a minimum, with the international standards regarding protection and defence of human rights and fundamental freedoms, in particular including the [...] International Labour Organisation’s eight Fundamental Conventions'. [The EDF group’s commitments and requirements, 03/2021: edf.fr]  
  • Met: Explicitly lists all four ILO core principles: The EDF Group’s commitments and requirements document states: 'The EDF group rejects all forms of forced labour, as defined in the ILO’s Fundamental Conventions [...] The EDF group rejects all forms of child labour, as defined in the ILO’s Fundamental Conventions [...] The EDF group respects freedom of association and the right to collective bargaining, as defined by the ILO [...] The EDF group guarantees equality of treatment for employees and refuses to accept any form of distinction, exclusion or preference on grounds of a person’s supposed race, skin colour, sex, age, religious views, political opinions, national background, social background, disability, family situation, sexual orientation or gender identity.' This document also states: 'If there are inconsistencies between the laws in a host country and these international standards, the EDF group strives to find an approach that conforms to the spirit of the international standards and concurrently complies with the country’s laws'. [The EDF group’s commitments and requirements, 03/2021: edf.fr]  
  Score 2  
  • Met: Expects suppliers to commit to ILO core principles: The CSR Charter between EDF and its suppliers states that 'The EDF Group undertakes to respect at least the international standards to protect and defend human rights and basic freedoms, particularly the UN International Human Rights Charter and the International Labour Organization’s fundamental conventions'. It then indicates that 'The supplier undertakes to consult, respect and enforce its employees, direct subcontractors, suppliers and business relationships to comply with the EDF Group’s abovementioned commitments'. As described below, the charter contains commitments to each ILO core area. [Corporate Social Responsibility charter between EDF and its suppliers, 01/2023: edf.fr]  
  • Met: Explicitly lists all four ILO core principles for suppliers: See above. The Charter states that 'The EDF Group commits to its staff to fight discrimination, harassment and violence, forced labour and child labour; to respect freedom of association and the right to collective bargaining, and to guarantee fair and favourable working conditions'. [Corporate Social Responsibility charter between EDF and its suppliers, 01/2023: edf.fr] |
| A.1.4         | Commitment to remedy                      | 0               | The individual elements of the assessment are met or not as follows: Score 1  
  • Not Met: Commitment to remedy adverse HRs impacts: The EDF Group’s commitments and requirements document states: 'If a violation of human rights or fundamental freedoms relating its activities is confirmed, the Group will reach out to the victims and/or their representatives with a view to remediying the situation.' However, 'reach out [...] with a view to remedying' is not considered a formal statement of commitment according to the methodology wording criteria regarding formal commitments. [The EDF group’s commitments and requirements, 03/2021: edf.fr]  
  Score 2  
  • Not Met: Expects suppliers to make this commitment  
  • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms  
  • Not Met: Commitment to work with suppliers on remedy: In its Corporate Social Responsibility charter between EDF and its suppliers, the Company declares that 'Any severe environmental or social breach noted with respect to the EDF Group’s commitments and requirements will be subjected to an in-depth joint analysis between the EDF Group and the supplier to define the actions to be taken to rapidly remedy these discrepancies.' However, it is not clear if the Company is formally committed to work with suppliers in providing the actual remediation. [Corporate Social Responsibility charter between EDF and its suppliers, 01/2023: edf.fr] |
| A.2.1         | Commitment from the top                    | 0.5             | The individual elements of the assessment are met or not as follows: Score 1  
  • Met: Board level responsibility for HRs: The Company’s 2022 URD reveals in the section "Ethics, compliance and human rights" that 'The Board of Directors of EDF, through its Corporate and Social Responsibility Committee, oversees the
### B Embedding respect and human rights due diligence

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<tr>
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<th>Explanation</th>
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<tbody>
<tr>
<td>B.1.1</td>
<td>Responsibility and resources for day-to-day human rights functions</td>
<td>1.5</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Met: Score of 1 on A.1.2.a • Met: Senior responsibility for HRs implementation and decision making: The Company’s 2022 URD states that 'The CSR Strategic Committee, which is chaired by the Chairman &amp; Chief Executive Officer and composed of the Group’s Executive Directors, conducts an in-depth review of all CSR issues, for which it provides strategic management and coordination. Changing the agenda, the conclusions of the meetings are reported to the Board of Directors'. This includes human rights. [Universal Registration Document 2022, 2023: edf.fr] Score 2 • Met: Describes day-to-day responsibility for implementing HRs commitments: The Company’s also indicates that 'The SDC [Sustainable Development Committee] prepares the files presented to the CSR Strategy Committee and acts as a sector committee for environmental and societal competencies. It is chaired by the Sustainable Development Director and is made up of some twenty representatives in charge of sustainable development within their respective entities'. Specificaly, the Vigilance Plan Framework states that in regards to the Vigilance Plan, 'The Sustainable Development Committee (SDC) represents all of the Group’s businesses and prepares the files presented to the CSR Strategic Committee'. This includes human rights [Universal Registration Document 2022, 2023: edf.fr] &amp; [Vigilance Plan Framework 2022, 04/2023: edf.fr] • Met: Day-to-day resources and expertise allocation in own operations: The Company’s website discloses that 'A Duty of Care Chief Compliance Officer, is tasked with managing and coordinating the Duty of Care plan and reporting on its effective implementation based on feedback from the entities, in conjunction with the Group Legal Division, the Group Ethics and Compliance Division and the Group Risks Division. He manages the network of Duty of Care Officers.' Additionally, the 2022 URD declares that 'EDF has strengthened its oversight of the Vigilance Plan with the appointment, in December 2020, of a Group Duty of Vigilance Compliance Officer by two members of the Executive Committee: the Group Corporate Secretary and the Group Executive Director in charge of Innovation, Corporate Responsibility and Strategy. This officer is responsible for the development, deployment and coordination of the vigilance plan and its application within the Group.' Finally, the URD states 'The deployment and coordination of the Vigilance Plan is based on a network of Duty-of-Vigilance Officers appointed in each Group entity concerned.' [Ethics and compliance: governance, charter and policy- web, 28/01/2021: edf.fr/en/the-edf-group/taking-action-as-a-responsible-company/ethics-and-compliance-programme/the-edf-groups-commitment-to-ethics-and-compliance] &amp; [Universal Registration Document 2022, 2023: edf.fr]</td>
</tr>
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</table>
### B.2.1 Identifying human rights risks and impacts

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<th>Score (out of 2)</th>
<th>Explanation</th>
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</table>
|                | The individual elements of the assessment are met or not as follows: Score 1 | 1.5 | - Not Met: Resources and expertise allocation in supply chain: The Registration document describes EDF’s approach to responsible procurement, including the principles and commitments expected from suppliers, and the integration of CSR considerations throughout the procurement process. However, this information does not provide details on how the Company allocates human resources and expertise for the day-to-day management of relevant human rights issues in its supply chain, which is what the sub-indicator is seeking. [Universal Registration Document 2022, 2023: edf.fr]  
- Met: Describes process of identifying risks in own operations: The Company’s 2022 URD states: ‘In the area of human rights and fundamental freedoms, the Group’s ethics and compliance policy, which includes the duty of vigilance, has led the EDF group to implement an approach that results in the identification of key risks and associated mitigation measures, assessed according to the Group’s activities and the countries where the Company and its subsidiaries operate. Two categories of salient risks related to human rights and fundamental freedoms were identified: [1] at the cross-functional/global level: risks related to harassment and discrimination; [2] in the Group’s international activities and projects, and in particular in geographical areas where local practices and situations, as well as legislation, are less demanding than the standards of OECD countries: risks of infringing on the rights of local communities: these risks are linked to land issues and population displacements, or to the consequences of inadequate consultation of local communities, particularly indigenous ones, risk of infringement of workers’ rights including risks related to decent working conditions at the Group’s construction sites, risks related to the use of security forces for projects near conflict zones or security regimes’. [Universal Registration Document 2022, 2023: edf.fr]  
- Met: Describes process of identifying risks in business relationships: The Vigilance Plan Framework states: ‘The salient risks relating to the duty of vigilance concerning suppliers and subcontractors are identified on the basis of a risk map covering all of EDF’s purchasing categories within the scope of purchases covered by the Group Purchasing Department. The method takes into account all aspects of CSR (environment, working relations and conditions, human rights, ethics and compliance). Its ultimate aim is to determine the degree of residual risk and identify actions for the supplier. This risk analysis covers approximately 11,000 suppliers who have a contract with EDF. More than 97% of its purchases are made in France and 99.4% in Europe. Risks are assessed per purchasing categories. The evaluation and prioritisation of risks is based on the activities of suppliers, and their geographical location is also a major factor in the assessment of risk’. [Vigilance Plan Framework 2022, 04/2023: edf.fr]  
- Score 2 | 1.5 | - Met: Describes global risk identification system incl. stakeholder consultation: The Company indicates that ‘Dialogue with stakeholders is a major part of EDF’s culture. It forms the basis of our cooperation with our stakeholders. The Global Framework Agreement on Corporate Social Responsibility signed by EDF in 2018 and extended for two years on 29 November 2021 with the Group’s trade unions and two international trade union federations (IndustriAll and ISP) states that EDF’s Vigilance Plan will be “developed and set up in association with the Company stakeholders, including workers’ representative organisations” (see section 3.5.3.1.1. “The Global Social Responsibility Agreement”). Since 2018, the Committee for Dialogue on Social Responsibility (CDRS), made up of representatives of all the signatories of the agreement, has been working on numerous topics related to the Duty of Vigilance (health and safety, exercise of the group’s responsibility in the context of international projects, impacts of the pandemic, etc.) […] Externally, EDF participated in discussions with other companies, lawyers, NGOs, and trade union federations within the framework of the “Entreprises pour les droits de l’homme” (Businesses for Human Rights) (EDH 1) non-profit organisation, in order to openly exchange on the expectations of all stakeholders, practices and improve Vigilance Plan preparation processes. In November 2021, EDF also took part in a peer review on the Vigilance plan, organised by Global Compact (2), bringing together other groups subject to the law, and personalities from the world of non-profits and research […] In June 2022, EDF submitted its Vigilance Plan and its Group-wide implementation to the Stakeholder Council. At the same time, the Group is steadfastly pursuing discussions opened with a range of members of civil society (non-profits, leading figures) keen to maintain this dialogue, with the aim of continuously improving its quality.' |
B.2.2 Assessing human rights risks and impacts 2

The individual elements of the assessment are met or not as follows:

Score 1

* Met: Describes assessment process and discloses salient HRs risks: The Company's 2022 URD states: 'The identified risks are qualitatively prioritised according to: their impact, i.e. their potential criticality, assessed using multiple criteria, including the assessment of the impact on the physical or human environment; their probability of occurrence, i.e. its degree of likelihood evaluated over a relevant time horizon, estimated on the basis of the history of the activity, feedback, or internal or external expertise; their level of risk control, i.e. the efficiency of the actions implemented. The main purpose of the general risk mapping exercise is to define and implement action plans (prevention, protection, mitigation etc.) to reduce the impact of the risks and/or risk probability [...] In the area of human rights and fundamental freedoms, the Group’s ethics and compliance policy, which includes the duty of vigilance, has led the EDF group to implement an approach that results in the identification of key risks and associated mitigation measures, assessed according to the Group’s activities and the countries where the Company and its subsidiaries operate. Two categories of salient risks related to human rights and fundamental freedoms were identified: See further details below and b.2.1. [Universal Registration Document 2022, 2023: edf.fr]

* Not Met: Describes risks identified in relation to new circumstances: The Company devotes a section to explain 'main prevention mitigation and monitoring measures implemented'. However, this sub indicator looks for description of risks identified as consequence of conducting a risk identification process following new circumstances such as changes in social, political context, entry in new country or region of operation, new relationships etc. [Universal Registration Document 2022, 2023: edf.fr]

* Met: Public disclosure of results of HRs risk assessment: Two categories of salient risks related to human rights and fundamental freedoms were identified: [1] at the cross-functional/global level: risks related to harassment and discrimination; [2] in the Group’s international activities and projects, and in particular in geographical areas where local practices and situations, as well as legislation, are less demanding than the standards of OECD countries: risks of infringing on the rights of local communities: these risks are linked to land issues and population displacements, or to the consequences of inadequate consultation of local communities, particularly indigenous ones, risk of infringement of workers’ rights including risks related to decent working conditions at the Group’s construction sites, risks related to the use of security forces for projects near conflict zones or security regimes.' [Universal Registration Document 2022, 2023: edf.fr]
### B.2.3

#### Integrating and acting on human rights risks and impact assessments

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<th>Score (out of 2)</th>
<th>Explanation</th>
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| 1.5              | The individual elements of the assessment are met or not as follows: Score 1

- **Met:** Describes system to prevent, mitigate and remediate HRs issues: The Company’s 2022 URD states: ‘Global actions to prevent and mitigate risks related to the duty of vigilance: Risk prevention and mitigation measures are implemented by each relevant entity by way of applying cross-functional and sectorial policies and using ordinary Group methodology for risk control as a basis. This methodology provides a description of risk treatment action plans and an evaluation of their efficacy. Industrial projects are subject to a risk analysis within the scope of application of the duty of vigilance, taking into account their nature, size, technical features and location. For this purpose, environmental and social impact assessments are based on the most demanding international standards (mostly IFC, WB, ADB). In addition, issues relating to the environment, personal health and safety and human rights are systematically addressed as part of the assessment process for projects submitted to the Group Executive Committee’s Commitments Committee (CECEG) and to the Committee that validates the Group’s international development projects, the International Business Development Committee (CBDI). The Company describes measures for ‘preventing and dealing with […] violence, intolerance or injustice in the workplace’, ‘combating sexism and all forms of discrimination’, ‘preventing risks related to the […] violations of the rights of communities and workers and the use of security forces’, where the Company also discloses some actions in specific projects. [Universal Registration Document 2022, 2023: edf.fr]

- **Not Met:** Describes how global system applies to supply chain: The Company describes the ‘main prevention, mitigation and monitoring measures implemented’, including implementing CSR and supplier commitments through validation of a compliance commitment for all bidders, incorporation of CSR criteria in tenders, integrating a CSR clause (covering human rights) in purchasing conditions. It also describes how it monitors suppliers. However, this subindicator looks for evidence of proactive actions it takes to face specific salient issues in the supply chain. [Universal Registration Document 2022, 2023: edf.fr]

- **Met:** Example of actions decided on at least 1 salient HRs issue: The Company indicates that ‘The EDF group and some of its subsidiaries have decided to apply for an international certification (GEEIS certification) to assess the quality and relevance of their commitments to gender diversity and equality in the workplace. The certification was renewed in 2019 and, for the very first time, it was extended to all the Group’s other fields of action in terms of diversity and inclusion. Signing a GEEIS commitment charter, marking the Group’s commitment to fighting stereotypes by deploying inclusive artificial intelligence without gender stereotypes in all business processes and environments. The EDF group is committed to preventing and combating all forms of violence against women, in the workplace (sexism, harassment) and also domestic and family violence (support, guidance and job retention). The aim is to train and raise the awareness of managers and Human Resources personnel on the subjects of sexism and both moral and sexual harassment […] A toll-free hotline for all employees of the Company, operating seven days a week, to allow employees to confide in someone and obtain advice on all harassment and discrimination issues; a support team (with internal and external skills) intervenes in investigations carried out when alerts are reported’. [Universal Registration Document 2022, 2023: edf.fr]

#### Explanation

Score 2

- **Met:** Meets all requirements under score 1

- **Met:** Describes how assessment involved affected stakeholders: The Company indicates that ‘The Global Framework Agreement on Corporate Social Responsibility […] states that EDF’s Vigilance Plan will be developed and set up in association with the Company stakeholders, including workers’ representative organisations […]Since 2018, the Committee for Dialogue on Social Responsibility (CDRS), made up of representatives of all the signatories of the agreement, has been working on numerous topics related to the Duty of Vigilance (health and safety, exercise of the Group’s responsibility in the context of international projects, impacts of the pandemic, etc.) and on the actions to be implemented to roll out and improve the Group’s Vigilance Plan […] Externally, EDF participated in discussions with other companies, lawyers, NGOs, and trade union federations within the framework of the “Enterprises pour les droits de l’homme” (Businesses for Human Rights) (EDH) non-profit organisation, in order to openly exchange on the expectations of all stakeholders, practices and improve Vigilance Plan preparation processes’. [Universal Registration Document 2022, 2023: edf.fr]
### Indicator Code  | Indicator name | Score (out of 2) | Explanation
--- | --- | --- | ---

| • Met: Describes how stakeholders involved in decisions about actions taken: The Company indicates that 'The Global Framework Agreement on Corporate Social Responsibility [...] states that EDF’s Vigilance Plan will be developed and set up in association with the Company stakeholders, including workers’ representative organisations [...]Since 2018, the Committee for Dialogue on Social Responsibility (CDRS), made up of representatives of all the signatories of the agreement, has been working on numerous topics related to the Duty of Vigilance (health and safety, exercise of the Group’s responsibility in the context of international projects, impacts of the pandemic, etc.) and on the actions to be implemented to roll out and improve the Group’s Vigilance Plan [...] Externally, EDF participated in discussions with other companies, lawyers, NGOs, and trade union federations within the framework of the “Enterprises pour les droits de l’homme” (Businesses for Human Rights) (EDH) non-profit organisation, in order to openly exchange on the expectations of all stakeholders, practices and improve Vigilance Plan preparation processes'. [Universal Registration Document 2022, 2023: edf.fr]

| B.2.4 | Tracking the effectiveness of actions to respond to human rights risks and impacts | 0 | The individual elements of the assessment are met or not as follows:
Score 1
• Not Met: Describes system for evaluation effectiveness of actions: The Company has provided evidence to BHRRC regarding this sub-indicator. However, the provided evidence primarily focuses on the Group’s ongoing efforts to enhance the monitoring and assessment of its Vigilance Plan. However this sub-indicator seeks evidence related to the Company’s system for tracking or monitoring specific actions taken in response to human rights risks and impacts, as well as evaluating their effectiveness. This includes assessing whether these actions have achieved their intended outcomes, identified any missed key issues, or failed to produce the desired results. [Universal Registration Document 2022, 2023: edf.fr]

| B.2.5 | Communicating on human rights impacts | 0 | The individual elements of the assessment are met or not as follows:
Score 1
• Not Met: Provides two examples of comms with stakeholders
Score 2
• 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:
Score 1
• Met: Grievance mechanism accessible to all workers: The EDF Group’s commitments and requirements document states: ‘The EDF group is committed to providing a whistleblowing mechanism for: [1] All Group employees, external employees or occasional workers, enabling them to report violations of laws and regulations, crimes and offences, failure to comply with the Code of Conduct, violation of an international undertaking ratified by France, or a threat or serious harm to the general interest; [2] Third parties to report any risk of serious violations of human rights and individual freedoms, or harm to the environment, health and safety arising from the Group’s activities.’ [The EDF group’s commitments and requirements, 03/2021: edf.fr]

Score 2
• Not Met: Grievance mechanism available in appropriate languages and workers made aware: The Company's Vigilance Plan Framework declares that 'The Group whistleblowing system, managed from an independent platform, may be accessed at any time via the EDF group website, in French, English, Italian, Portuguese, Dutch and Mandarin, in France or abroad. The whistleblower can report in the language of their choice.' In regard to employees' awareness, the Company's 2022 URD states: 'They [Executives] must provide regular information about the Group whistleblowing system [...] With regard to training, in 2021, the Group developed an e-learning module dedicated to the duty of vigilance to raise awareness and help deploy the Group’s compliance plan.' However, it is not clear if mechanism is available in all appropriate languages, as the Group also operates in the Middle East. [Vigilance Plan Framework 2022, 04/2023: edf.fr] & [Universal Registration Document 2022, 2023: edf.fr]
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<th>Explanation</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td>1</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Met: Grievance mechanism accessible to all external individuals and communities: The Company indicates that 'The Group whistleblowing system allows Group employees and external staff [...] as well as third parties, to report wrongdoing of which the EDF group or its staff are the culprits or victims.' [Universal Registration Document 2022, 2023: edf.fr] Score 2 • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The Company's Vigilance Plan Framework declares that 'The Group whistleblowing system, managed from an independent platform, may be accessed at any time via the EDF group website, in French, English, Italian, Portuguese, Dutch and Mandarin, in France or abroad. The whistleblower can report in the language of their choice.' However, despite EDF Group operating in the Middle East, its whistleblowing platform is not currently accessible in Arabic. Furthermore, no evidence was found of how the Company ensures that external stakeholders who may be affected are made aware of the existence of this platform. [Vigilance Plan Framework 2022, 04/2023: edf.fr] • Not Met: Describes how external individuals/communities access grievance mechanism: No evidence was found to suggest that the Company has established mechanisms to guarantee access to this platform for suppliers' external stakeholders and local communities. • Not Met: Expects supplier to convey expectation to their suppliers</td>
</tr>
<tr>
<td>C.7</td>
<td>Remedying adverse impacts</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes approach taken to remedy adverse HRs impacts • Not Met: Describes how remedy would be provided if no adverse impact identified Score 2 • Not Met: Describes changes to systems, processes and practices to prevent future impacts • Not Met: Describes approach to monitoring/implementing agreed remedy • Not Met: Describes approach to learning from incidents if no adverse impacts identified</td>
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**CSI. Responsible lobbying and political engagement fundamentals**

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<tr>
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<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
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</table>
| CSI.18         | Responsible lobbying and political engagement fundamentals | 0.5             | The individual elements of the assessment are met or not as follows: Score 1 • Met: Publicly available policy statement(s) (or policy(ies)) setting out lobbying and political engagement approach.: The EDF Group's commitments and requirements document states the following: 'The EDF group is committed to carrying out all its endeavours involving interest representation in a completely transparent manner and based on reliable, verified and up-to-date information. The EDF group is committed to complying with the laws, regulations and international conventions governing lobbying in the country where it is carried out, and to complying with the codes of ethics of the organisations it targets. The EDF group shall not attempt to influence a public official’s position by offering an undue advantage or encourage them to breach their organisation’s ethical rules.' In addition, the Group Code of Conduct states: 'Lobbying actions must be carried out transparently. This entails clearly informing your contacts of your affiliation with EDF and using reliable, verified and updated information'. [The EDF Group’s commitments and requirements, 03/2021: edf.fr] & [Code of Conduct, 01/07/2021: edf.fr] • Not Met: Publicly available policy statement that specifies the Company does not make political contributions: The Company's 2022 URD reveals that 'The EDF group complies with the laws and regulations in force concerning the
financing of political parties. In accordance with the legislation in force in France, EDF makes no payments to political parties. The Group’s Italian and UK subsidiaries have written directly into their codes of conduct the prohibition of financing political parties. In countries where it is allowed (such as the United States), EDF group companies may determine whether they wish to provide financial support. In such case, the financing shall comply with the principle of neutrality. Every year, the Group companies concerned must report any financing to their parent company. [Universal Registration Document 2022, 2023: edf.fr]

Score 2
- Not Met: Meets all requirements under score 1
- Met: Disclosure of expenditures on lobbying activities: In its 2022 URD, the Company discloses that ‘In 2022, EDF Renewables made payments in the United States, consisting of US$4,190 in the form of Political Action Committee contributions and US$348,000 in the form of Corporate Contributions’. [Universal Registration Document 2022, 2023: edf.fr]
- Not Met: Requirement for third-party lobbyists to comply with the Company’s lobbying and political engagement policy (or policies)

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

D. Indigenous Peoples’ and Affected Communities’ Rights

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<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
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</thead>
<tbody>
<tr>
<td>D.1.PD</td>
<td>Commitment to respect indigenous peoples’ rights</td>
<td>1</td>
<td>The individual elements of the assessment are met or not as follows: Score 1金币</td>
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<td></td>
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<td>• Met: Commitment to respect indigenous peoples’ rights with explicit reference to UN Declaration: The EDF’s commitments and requirements document states that ‘The EDF group is committed to respecting the rights and distinctive features of indigenous populations as defined in the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) and ILO Convention 169. The UNDRIP in particular stipulates that Indigenous peoples shall not be forcibly removed from their lands or territories. No relocation shall take place without the free, prior and informed consent of the indigenous peoples concerned and after agreement on just and fair compensation.’ In this document, the Company assure that this Group commitment is also a requirement for business relations. [The EDF group’s commitments and requirements, 03/2021: edf.fr]</td>
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<td></td>
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<td>Score 2</td>
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<td></td>
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<td>• Not Met: Description of process for identifying indigenous persons and customary lands. Commitment to FPIC (in line with ILO No.169): In its Universal Registration Document (UDR) 2022, the Company states: ‘EDF is aware of the unique issues facing indigenous peoples and is committed to following the best international standards in this area and, more specifically, the UNDRIP (United Nations Declaration on the Rights of Indigenous Peoples), ILO Convention 169 and World Bank standards. In particular, EDF recognises the criteria for characterising indigenous peoples included in these standards, including historical and geographic “pre-existence,” “cultural distinctiveness,” “self-identification,” and “non-dominance.” EDF upholds the individual and collective rights of indigenous peoples and communities, including their right to self-determination, their right to land, territories and resources, and their right to FPIC (Free Prior and Informed Consent) in its projects and activities, as defined by ILO Convention 169’. However, no details were found in relation to the process followed to determine who is an indigenous person and what constitutes customary, ancestral or collective lands or resources. The Company has provided comments to BHRRNC regarding this sub-indicator. However, the provided evidence was not public available (nor descriptive of the steps followed). [Universal Registration Document 2022, 2023: edf.fr]</td>
</tr>
</tbody>
</table>

| D.2.PD         | Engagement with all affected communities         | 0.5              | The individual elements of the assessment are met or not as follows: Score 1                                                                 |
|                |                                                  |                  | • Met: Describes how local communities identified and engaged in the last two years: In 2022 The Company updated its Just Transition Principles which discloses that ‘EDF engages with local communities to address the risks of energy transition regarding regional economies […] We closely monitor social impacts for each project. First, an early environmental and social (E&S) due diligence is carried out, all stakeholders are identified. Dialogue and consultation are established as far upstream as possible along with the E&S impact assessments, including human |
The individual elements of the assessment are met or not as follows:

Score 1
• 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 of statistics for each project describing demographics of benefit/ownership sharing

Score 2
• Not Met: Provides two examples of engagement with communities: Also in its Just Transition Principles the Company shares the following example of stakeholder engagement: 'During the development of the EDEN Solar Plant in Bap Tehsil (Rajasthan, India), dialogue with local communities has been well established and taken into account on several topics: Avoidance of negative impacts: a bypass road was built to avoid traffic disturbances in the village; Mitigation of negative impacts: the design of the plant has been revised to save trees, as it was important for the local communities to avoid cutting them; Offset of negative impacts: when trees needed to be removed (tree cutting limited to those directly affecting the solar panels), three trees were planted instead; Offset of negative impacts: community investments have been implemented, such as the creation of a water pond in the village. During the O&M phase, dialogue and CSR investments have continued: A social budget is dedicated every year to programs such as construction of toilets in schools, provision of fans, bags or sport materials to students, provisions of bicycles to the poorest villagers, etc. The development of the project created several job opportunities for people living in the surrounding area, with priority given to directly affected households'. Additionally, in its URD 2022, the Company discloses the following example: 'Concerning the BIOVEA Energie biomass power plant project in Côte d'Ivoire, a specific study was carried out on child labour in order to understand its nature and causes in the agro-industrial sector of the region in which the power plant will be located. On the basis of this study, BIOVEA Energie has chosen to act, in particular through a collaborative venture with the cooperative of the Toundoué region, which alone covers the vast majority of small planters in this area. The objective is to develop Champs École Paysans ("Farmer Field Schools" or CEPs), which allow the implementation of good agricultural and management practices based on 6 themes, including a specific one on child labour. A budget of €150,000 is planned for the first two years for the launch and development of the CEPs, followed by €24,000 of support per year for 14 years. In this connection should be noted the operational implementation in 2022 of the committees for follow-up, shortlisting and for the mechanism to settle complaints of communities (11 complaints were recorded mid-year, with 7 settled, and 4 under investigation'). [EDF’s Just Transition Principles, 10/2022: edf.fr]
• Met: Provides two examples of engagement with communities: Also in its Just Transition Principles the Company shares the following example of stakeholder engagement: 'During the development of the EDEN Solar Plant in Bap Tehsil (Rajasthan, India), dialogue with local communities has been well established and taken into account on several topics: Avoidance of negative impacts: a bypass road was built to avoid traffic disturbances in the village; Mitigation of negative impacts: the design of the plant has been revised to save trees, as it was important for the local communities to avoid cutting them; Offset of negative impacts: when trees needed to be removed (tree cutting limited to those directly affecting the solar panels), three trees were planted instead; Offset of negative impacts: community investments have been implemented, such as the creation of a water pond in the village. During the O&M phase, dialogue and CSR investments have continued: A social budget is dedicated every year to programs such as construction of toilets in schools, provision of fans, bags or sport materials to students, provisions of bicycles to the poorest villagers, etc. The development of the project created several job opportunities for people living in the surrounding area, with priority given to directly affected households'. Additionally, in its URD 2022, the Company discloses the following example: 'Concerning the BIOVEA Energie biomass power plant project in Côte d'Ivoire, a specific study was carried out on child labour in order to understand its nature and causes in the agro-industrial sector of the region in which the power plant will be located. On the basis of this study, BIOVEA Energie has chosen to act, in particular through a collaborative venture with the cooperative of the Toundoué region, which alone covers the vast majority of small planters in this area. The objective is to develop Champs École Paysans ("Farmer Field Schools" or CEPs), which allow the implementation of good agricultural and management practices based on 6 themes, including a specific one on child labour. A budget of €150,000 is planned for the first two years for the launch and development of the CEPs, followed by €24,000 of support per year for 14 years. In this connection should be noted the operational implementation in 2022 of the committees for follow-up, shortlisting and for the mechanism to settle complaints of communities (11 complaints were recorded mid-year, with 7 settled, and 4 under investigation'). [EDF’s Just Transition Principles, 10/2022: edf.fr]
• Not Met: Examples of engagement refer to marginalised groups and provide additional detail:

The Environmental and Social Action Plan (ESAP) for the Koudia El Baida Wind Farm Project - Morocco, sets the following action: 'Publish and implement the Stakeholder Engagement Plan (SEP) prepared by the Project, according to modalities that vary depending on the stakeholder’s category. Implementation of the SEP will guarantee access to information for all parties with an interest in the project, including vulnerable groups. The SEP is to be regularly updated when necessary, as the Project progresses. Establish a grievance mechanism. The mechanism will apply to grievances of all kinds that external stakeholders could raise about the Project [...] Once implemented, the SEP will be self-supporting and accessible to the public, and will include the contact details of the Project officials (including community liaison officers) in charge of engaging with stakeholders and recording grievance'. However, no further details found, including a 2nd example and whether FPIC was achieved. [Environmental and Social Action Plan-Koudia El Baida Wind Farm Project, 27/06/2022: ebrd.com]

Score 2
• Not Met: Analysis of stakeholder views on company’s HRs issues
• Not Met: Describes how stakeholders views influenced company’s HRs approach

Score 0
• 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
The individual elements of the assessment are met or not as follows:

**Score 1**
- **Met:** Actions taken to support access and affordability of renewable energy in the value chain: The Just Transition Principles document declares that 'EDF is helping to make energy accessible through rural electrification, off-grid and micro-grid projects and other innovative technologies. In partnership with local entrepreneurs, EDF offers decentralized electricity generation services that prioritize clean energy. The off-grid projects provide electricity services to individuals or very small businesses, mainly in rural areas in six African countries (ZECI in Ivory Coast, ZEGHA in Ghana, BBETO in Togo, KES in South Africa, and since 2020 with SunCulture in Kenya and SMG in Zambia). Additionally, in its 2022 URD, the Company shares that 'in terms of new business lines, EDF is aiming to have a portfolio of 1 million off-grid kits by 2030 and is pursuing the development of new markets such as microgrids, smart grids, storage, hydrogen, mobility, etc., as well as further strengthening its positions in energy efficiency services, grids, and engineering services [...] In the field, EDF takes measures to fight energy poverty and engages in mediation alongside institutions and non-profit organisations [...]'.

Also, in its URD, 2022 the Company shares that 'a partnership to deploy solar pumps was set up in 2020 with the Kenyan company SunCulture (owned by EDF International via an indirect stake) and the Togolese government. [...] EDF Renewables has launched 60 crowdfunding initiatives raising over €9 million from 4,944 private individuals to finance solar and wind power projects. This funding method has intensified: in 2022 alone, 19 such initiatives were launched by EDF Renewables in partnership with crowdfunding operators, raising over €2 million from 1,414 investors. In Belgium, following on from the success of Luminus Wind Together (its first crowdfunding initiative for wind farms), Luminus launched Lumiwind, a cooperative allowing the general public and those living close to wind farms to invest in energy transition.' Furthermore, the Company’s 2021 Impact Report states that ‘EDF’s R&D teams are also continuing their research on microgrids, to industrialise a reliable, low-cost solution that meets local needs and markets’. However, no evidence found of actions taken including value chain.

- **Not Met:** Including a timebound actions plan and reporting targets: No evidence was found that the Company set a time-bound action plan nor targets (regarding access and affordability of renewable energy in the communities it operates and its value chain) developed in consultation with communities including marginalised groups at heightened risk of energy poverty.

**Score 2**
- **Not Met:** Public support for government policies addressing energy access

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### E. Land and resource rights

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<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
</table>
| E.1.PD | Respect for land and natural resource tenure rights | 0 | The individual elements of the assessment are met or not as follows: Score 1  
- **Not Met:** Commitment to respect land ownership/natural resources as in VGGT. Discloses how identifies legitimate tenure holders.: The Company has provided evidence to BHRRC regarding this sub-indicator. However, the provided evidence does not include a public statement of commitment to the UNVGGT nor a description of how the company identifies the legitimate tenure rights holders, including where land and ownership rights are customary and or not formally recorded.  
- **Not Met:** Disclosure of locations of projects including numbers in urban, rural, natural areas: In its UDR 2022, the Company provides an update on its electricity generation activities in France and abroad and discloses the names and locations of some of its projects, for example, the Company shares an update on its nuclear unit Sizewell B located in Suffolk, United Kingdom. However, no evidence was found that the Company discloses the exact location of all its projects including the number or percentages of projects in urban, rural or natural areas. [Universal Registration Document 2022, 2023: edf.fr]  
Score 2  
- **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 |
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<th>Indicator Code</th>
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<th>Score (out of 2)</th>
<th>Explanation</th>
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</thead>
<tbody>
<tr>
<td>E.2.PD</td>
<td>Just and fair physical and economic displacement policy implementation including free, prior and informed consent</td>
<td>0.5</td>
<td>The individual elements of the assessment are met or not as follows: Score 1  • Not Met: Commitment to follow IFC PS 5 for physical and economic displacements: The Company's URD 2022 states, 'The EDF group identifies, for each project, the potential impact on the health, living conditions and environment of local communities, with reference to the performance standards of the International Finance Corporation (World Bank Group) and proposes suitable measures.' The Company also indicates that 'Risk prevention and mitigation measures are implemented by each relevant entity by way of applying cross-functional and sectorial policies and using ordinary Group methodology for risk control as a basis. This methodology provides a description of risk treatment action plans and an evaluation of their efficacy. Industrial projects are subject to a risk analysis within the scope of application of the duty of vigilance, taking into account their nature, size, technical features and location. For this purpose, environmental and social impact assessments are based on the most demanding international standards (mostly IFC, WB, ADB14)'. Nevertheless, this sub-indicator is looking for an explicit commitment to follow the IFC Performance Standard 5 in case physical and economic displacement is determined necessary. [Universal Registration Document 2022, 2023: edf.fr]  • Met: Commitment not to relocate without FPIC and to providing compensation: The EDF Group's commitments and requirements document states that 'The EDF group is committed to respecting the rights and distinctive features of indigenous populations as defined in the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) and ILO Convention 169. The UNDRIP in particular stipulates that “Indigenous peoples shall not be forcibly removed from their lands or territories. No relocation shall take place without the free, prior and informed consent of the indigenous peoples concerned and after agreement on just and fair compensation.” [...] In cases where its activity threatens or affects a community’s livelihood, the EDF group is committed to providing compensation and/or restoring livelihoods, at least to the conditions preceding its work.' [The EDF group’s commitments and requirements, 03/2021: edf.fr] Score 2  • Not Met: Publishes statistics on numbers affected by relocations (current and planned projects)  • Not Met: Publishes regular reviews of living conditions after relocation: The Company states that since the construction of its Nam Theun 2 Project in Laos- a trans-basin hydro project- began 'Houses have been built for all the affected households, alongside 2 dispensaries and 32 schools. Following a programme to support economic activity, Nakai plateau has undergone economic development; 97% of displaced households have achieved the revenue levels established by the programme. The median levels of consumption in the area are three times higher than the poverty threshold determined by the government. The entire population now has access to healthcare and education. 37% of those on village Committees are women'. However, no evidence was found of a systemic and regular review process put in place on the living conditions of all people displaced by the Company's covering current and planned projects in which it’s involved. [Universal Registration Document 2022, 2023: edf.fr]  • Not Met: Description of approach to physical and economic displacement</td>
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**F. Security and conflict-affected areas (incl. responsible mineral sourcing)**

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<thead>
<tr>
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<tbody>
<tr>
<td>F.1.PD</td>
<td>Operating in or sourcing from conflict-affected areas</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1  • Not Met: Commitment to heightened HRDD in conflict affected areas  • Not Met: Steps taken to assess and mitigate these risks with conflict sensitive lens Score 2  • Not Met: How stakeholders are involved in the process to mitigate risks</td>
</tr>
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</table>
### F. Security and conflict-affected areas (incl. responsible mineral sourcing)

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</table>
| F.2.PD         | Evidence of security provider human rights assessments | 0 | The individual elements of the assessment are met or not as follows: Score 1  
• Not Met: Regularly conducts risk assessment regarding security forces: The Company’s 2022 UDR, states that ‘at the project management level depending on the context of the project, a Human Rights Impact Assessment (HRIA) is conducted [...] These studies place the identification of impacted human rights at the centre of the analysis[...] This type of study identifies the activities at risk according to their importance and sensitivity [...] The conclusions of these studies are intended to be integrated into all development, construction, operation and end-of-life activities of the project, via an ad hoc management system [...] They concern both the affected communities and workers, the use of security forces, the whistleblowing system and the protection of whistleblowers, etc.’ Nonetheless, this particular sub-indicator seeks a regularly (at least annually) and thorough evaluation of risks associated with the use of security forces and arrangements, emphasizing the compatibility of its approach with the preservation of human rights. Furthermore, it looks for the public disclosure of assessment results. No suitable evidence was found. [Universal Registration Document 2022, 2023: edf.fr]  
Score 2  
• Not Met: Commitment to Voluntary Principles on Security and HRs  
• Not Met: If applicable, discloses use of private security providers and uses only ICoCA members. |
| F.3.PD         | Responsible sourcing of minerals: Arrangements with suppliers | 0 | The individual elements of the assessment are met or not as follows: Score 1  
• Not Met: Statement on OECD Guidance aligned due diligence  
• Not Met: Requirement on OECD Guidance aligned due diligence in contracts/codes with suppliers  
• Not Met: Describes work with suppliers on risk assessment and improving DD  
Score 2  
• Not Met: Disclosure of supply chain mapping |
| F.4.PD         | Responsible sourcing of minerals: Risk identification in mineral supply chains | 0 | The individual elements of the assessment are met or not as follows: Score 1  
• Not Met: Describes risk identification and disclosure in line with OECD Guidance  
Score 2  
• Not Met: Expectation of suppliers to disclose supply chain mapping  
• Not Met: Risk identification process covers all minerals |
| F.5.PD         | Responsible sourcing of minerals: Risk management in the mineral supply chain | 0 | The individual elements of the assessment are met or not as follows: Score 1  
• Not Met: Suppliers using minerals in equipment provided to describe steps taken to respond to risks in supply chain  
• Not Met: Those suppliers to describe monitoring of risk prevention/mitigation measures  
• Not Met: Those suppliers to disclose significant improvement over time  
Score 2  
• Not Met: How suppliers and affected stakeholders engaged on strategy  
• Not Met: Processes cover all minerals |

### G. Protection of human rights and environmental defenders

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<th>Explanation</th>
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</thead>
</table>
| G.1.PD         | Commitment to respect the rights of human rights and environmental defenders | 0.5 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Met: Zero tolerance of threats/attacks on HRDs: The Company’s 2022 URD declares that ‘The Group recognises the role of human rights and environmental defenders from all walks of life, both among its suppliers and in civil society. It is committed to protecting the exercise of their rights and ensures that it identifies the risks to human rights and environmental activists caused by its business operations and allows them to speak freely about its operations [...] The EDF group will not tolerate any intimidation, harassment, sanction or discrimination against an employee due to union activities and does not discourage employees from joining the organisations of their choice. The Group respects the right to collective bargaining and the role of workers’ organisations in the collective bargaining process’. [Universal Registration Document 2022, 2023: edf.fr]  
Score 2  
• Not Met: Expectation on business partners in value chain to make this commitment  
• Not Met: Description of how working with HRDs to create safe and enabling environment |

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**Note:** The explanations provided are based on the given text and may need to be interpreted further for complete understanding.
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<th>Explanation</th>
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<tbody>
<tr>
<td>H.1.PD</td>
<td>Health and safety</td>
<td>2</td>
<td>The individual elements of the assessment are met or not as follows:</td>
</tr>
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</table>
|               |                                |                  | 1. **Met:** Discloses quantitative H&S information (injury rates or lost days, and fatalities): In its 2022 URD, the Company discloses that 'There were two work-related fatal accidents directly in 2022. These fatalities concerned one employee who was electrocuted during removal of a line, and one employee who fell from a height during work in a mountainous area. In addition to these two fatal accidents, we are saddened to report eight deaths, of six of our employees and two of our service providers who reported feeling unwell, as well as a fatal accident to one of our employees while travelling.' Furthermore, this document presents quantitative data for its last three reporting years, on the Group employees' Lost Time Injury Rate (LTIR), the number of employee work-related accidents with at least one lost day, the accident severity rate, and the number of occupational illnesses. [Universal Registration Document 2022, 2023: edf.fr]  
|               |                                |                  | 2. **Met:** Expectation extends to relevant business relationships: In its 2022 URD, the Company discloses its Suppliers’ LTIR and its Suppliers' work-related accidents with at least one lost day, for its last three reporting years. Also, see above: 'we are saddened to report eight deaths, of six of our employees and two of our service providers who reported feeling unwell.' [Universal Registration Document 2022, 2023: edf.fr] |
|               |                                |                  | 2. **Met:** Sets targets for H&S performance (including injury rates or lost days and fatalities): The Company’s 2022 URD declares that 'EDF is committed to improving the physical and mental health of its employees and subcontractors. The top priority is to protect them and, most importantly, to eradicate serious and fatal accidents.' In addition, the EDF Health and Safety Group Policy affirms: the Company’s ‘first objective is to eradicate serious and fatal accidents: zero serious accidents and zero fatalities in 2023. Meeting this requirement will play a role in developing our prevention culture and allow us to reduce the injury rate [overall LTIR < 1 in 2030] [and] improve health and well-being at work [absenteeism < 8 days per employee per year in 2023]. [EDF Group Health and Safety Policy V2.0, 26/04/2021: edf.fr]  
|               |                                |                  | 2. **Met:** Met targets or explains why not or how improve H&S management systems: While explaining its Health and Safety Management The Company discloses: 'The Group focused its commitment on the 10 key rules, identified on the basis of an analysis of the fatal accidents that have befallen the EDF group over the past 30 years [...] When safety conditions related to key rules are not met, a “NoGo” must be activated to correct the situation before starting. In the same way, when unforeseen circumstances no longer allow the safety rules to be respected, a “safety STOP” should be marked. A pause was observed throughout the Group on 13 October 2021 for each work team to discuss how to adapt the new policy to their own situation and ensure its adoption [...] In order to ensure the continuous improvement loop, and to maintain risk awareness, High-Potential Events (HPE) are collected, analysed, and shared throughout the Group. 72% of these HPEs are near-misses or dangerous situations. Particular emphasis is placed on those related to the Group’s 10 key rules. In 2022 the safety criterion of the EDF profit-sharing agreement focused on developing analyses of accidents involving halting, and reducing the number of HPE-classified accidents with or without halting [...] Audits are carried out each year throughout the Group, in particular in the form of site visits. These visits are written up in a site visit report shared locally with the audited teams.' [Universal Registration Document 2022, 2023: edf.fr] |
| H.2.PD        | Forced labour risk management  | 0.5              | The individual elements of the assessment are met or not as follows:                                                                                                                                       |
|               |                                |                  | 1. **Not Met:** Board level oversight over policies on forced labour in supply chain. How relevant stakeholders informed board discussions  
|               |                                |                  | 2. **Not Met:** Suppliers to have these arrangements in place [Global Framework Agreement on the EDF Group’s Corporate Social Responsibility, 26/06/2018: edf.fr] |
|               |                                |                  | 2. **Not Met:** Discloses ongoing efforts to prevent and mitigate forced labour in own ops and supply chain |


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</table>
| **H.3.PD** | Prohibition of forced labour: Wage practices | 0 | The individual elements of the assessment are met or not as follows:  
**Score 1**  
• Not Met: Requirements on paying in full and on time in supplier codes and contracts  
• Not Met: Describes work with suppliers on paying workers regularly, in full and on time  
**Score 2**  
• Not Met: Assessment scope of failure to pay workers in full and on time in supply chain  
• Not Met: Analysis of trends demonstrating progress |
| **H.4.PD** | Prohibition of forced labour: Restrictions on workers | 0 | The individual elements of the assessment are met or not as follows:  
**Score 1**  
• Not Met: Requirements on free movement in supplier codes and contracts  
• Not Met: Describes working with suppliers on free movement of workers  
**Score 2**  
• Not Met: Assessment of scope of restriction of movement in supply chain  
• Not Met: Capacity building to enable suppliers to cascade forced labour policies down supply chain |
| **H.5.PD** | Freedom of association and collective bargaining | 0.5 | The individual elements of the assessment are met or not as follows:  
**Score 1**  
• Met: Commitment on FoA/CB and requirements in suppliers codes and contracts: The Company’s 2022 UDR shares that ‘In 2018, EDF and two global trade union federations (IndustriAll and PSI) along with 15 trade union organisations representing EDF group employees signed a global framework agreement on the Group’s social responsibility, later extended for two years on 29 November 2021. This agreement automatically applies to all the Group’s employees, warrants the right to collective bargaining and effectively reflects its commitment to “make upholding human rights a prerequisite to all its business activities, and not to tolerate any violation of these rights whatsoever, whether during the course of its business, or by its suppliers, subcontractors and partners”. It confirms that, in the event of conflicting standards with applicable laws in countries in which it operates, the EDF group undertakes to apply the most protective human rights provisions while complying with the national laws. All controlled subsidiaries of the EDF group have now been informed of the agreement and are developing a social progress action plans [...] The EDF group will not tolerate any intimidation, harassment, sanction or discrimination against an employee due to union activities and does not discourage employees from joining the organisations of their choice. The Group respects the right to collective bargaining and the role of workers’ organisations in the collective bargaining process.’ [Universal Registration Document 2022, 2023: edf.fr] & [Global Framework Agreement on the EDF Group’s Corporate Social Responsibility, 26/06/2018: edf.fr]  
• Not Met: Describes work with suppliers on FoA/CB  
**Score 2**  
• Not Met: Assessment of scope of restriction of FoA/CB in supply chain  
• Not Met: Analysis of trends demonstrating progress |
| **H.6.PD** | Living wage (in supply chains) | 0 | The individual elements of the assessment are met or not as follows:  
**Score 1**  
• Not Met: Requirements on living wage in supplier codes and contracts  
• Not Met: Describes work with suppliers on living wage, beyond tier 1 suppliers  
**Score 2**  
• Not Met: Requirement for suppliers to regularly review definition of living wages with relevant trade unions |
## I. Right to a healthy and clean environment

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</thead>
</table>
| I.1.PD         | Environmental impact assessment and remediation   | 0.5              | The individual elements of the assessment are met or not as follows: Score 1  
• Met: Conducts public EIA and CIA for renewable energy projects: The Company's 2022 URD states that 'The Group applies the principles of the mitigation hierarchy or the regulations of the country where it is located, if these are more stringent (particularly in Europe). Group companies apply the PMO (Prevent, Minimize, Offset) hierarchy for all projects and facilities in operation. The environmental and societal impact assessments are completed prior to projects, pursuant to the current regulations and best practices (such as IFC Performance Standards if they are more restrictive) [...] EDF Renewables prioritises derelict sites and develops all its projects based on the "Prevent Minimize Offset" (PMO) hierarchy plus systematic impact assessments.' However, no evidence was found that the Company has in place cumulative impact assessments. In future assessments, the Company will also be expected to explain or demonstrate under what circumstances it undertakes Cumulative Impact Assessments for its renewable energy projects in order to meet this criteria. [Universal Registration Document 2022, 2023: edf.fr]  
• Not Met: Assessments comply with Espoo Convention and/or the EU Environmental Impact Assessment Directive and fulfil certain standards  
• Not Met: Reports on compliance with government-mandated remediation fund requirements  
• Not Met: Reports on how an entity guarantees payment for environmental restoration or compensation |
| I.2.PD         | Life cycle assessment                              | 0               | The individual elements of the assessment are met or not as follows: Score 1  
• Not Met: Expectation for suppliers to conduct regular public life cycle assessments (including risks related to raw material sourcing, waste, and decommissioning): The Company's 2022 UDR discloses that 'EDF Renewables, which uses raw materials to manufacture equipment, carried out life-cycle assessments on its technologies (onshore wind turbines, photovoltaic solar, battery storage) to identify the main environmental impacts, and the life-cycle phases making the biggest contributions, and to study the technical & economic feasibility of possible improvements.' Nonetheless, no evidence was found indicating that the Company had any expectations of its suppliers in this regard. [Universal Registration Document 2022, 2023: edf.fr]  
• Not Met: Requires suppliers to have action plans to address adverse impacts identified |

## J. Transparency and anti-corruption

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</table>
| J.1.PD         | Anti-corruption due diligence and reporting       | 1                | The individual elements of the assessment are met or not as follows: Score 1  
• Met: Expectation extends to relevant business relationships: The Company’s website states: 'In 2017, EDF reinforced its monitoring mechanism for its suppliers, by setting up a conformity undertaking. Its suppliers are required to comply with the Group’s values. Suppliers may not take part in any tendering procedures unless they have signed a compliance undertaking relating to bribery and corruption, money laundering, terrorist financing and conflicts of interest [...] This commitment and any other document attached are taken into account to assess suppliers involved in call for tenders. Our ambition is that 100% of suppliers sign this undertaking every year. This objective was reached in 2017, 2018 and 2019.' [Our procurement process at EDF- website, 27/03/2023: edf.fr/en/the-edf-group/dedicated-sections/suppliers/become-a-supplier/our-process]  
• Not Met: Reports on any complaints on corruption and bribery  
• Not Met: Reports that no such complaints were made |
K. Diversity, equality and inclusion

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<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
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</table>
| J.2.PD         | Payments to governments & contract transparency | 0 | The individual elements of the assessment are met or not as follows: Score 1  
• Not Met: Publishing a tax CbCR in line with GRI 207-4, or discloses payments made to governments at project-level including for purchase or rent of land or natural resources related to its renewable energy projects: The Company’s 2022 Universal Registration document states “At the end of 2022, as in 2021, the Group uploaded its country-by-country report (of data for fiscal year 2021) to the French tax authorities, in accordance with the provisions of Article 223(5)(c) of the French General Tax Code which follows the OECD’s recommendations.” However this report has not been made public. In future assessments, the Company will be expected to demonstrate it publishes a tax CbCR and a report on its payments to governments at project level, including for purchase or rent of land or natural resources related to its renewable energy projects [Universal Registration Document 2022, 2023: edf.fr]  
• Not Met: Disclosure of terms, contracts, agreements for those payments  
Score 2  
• Not Met: Supports governments to disclose contracts and licenses on renewable energy project in line with EITI |

K.1.PD Diversity, equality & inclusion training for management and employees 0 The individual elements of the assessment are met or not as follows:  
Score 1  
• Not Met: Provides mandatory and regular training as per ILO No 190: The EDF Group’s 2022 URD discloses that 'The executives must take all necessary steps to prevent discrimination, harassment and physical and emotional abuse within their entities by informing employees of these risks. They must provide regular information about the Group whistleblowing system and take appropriate disciplinary action in the event of proven wrongdoing [...]. Several training modules are available for everyone on e-Campus: the first module covers identifying and understanding the links between stereotypes and discrimination, [...] the second is about understanding and preventing ordinary sexism in the workplace and is entitled “Sexisme, pas notre genre” (Sexism is not for us); the third is a training module on preventing and combating sexual harassment [...] The e-learning programme dedicated to the prevention of ordinary sexism was attended by 2,888 employees on e-campus (i.e. 11,273 employees in aggregate since it went online) [...] An e-learning programme intended to prevent the risk of moral or sexual harassment was deployed for all target groups (management, HR, staff representatives, medical and social teams and employees) and was completed by 1,378 employees. Similar approaches are being deployed by EDF UK and Luminus [...]. A toll-free hotline for all employees of the Company, operating seven days a week, to allow employees to confide in someone and obtain advice on all harassment and discrimination issues [...] A support team (with in-house and external skills) intervenes in investigations carried out when alerts are reported’. However it is not clear that all company employees receive these trainings, including being made aware of the mechanisms for addressing it. [Universal Registration Document 2022, 2023: edf.fr]  
Score 2  
• Not Met: Requires suppliers to do the same  
• Not Met: Provides materials and access to resources for trainings |

K.2.PD Gender balance and sensitivity 0 The individual elements of the assessment are met or not as follows:  
Score 1  
• Not Met: Timebound action plan to integrate gender lens to all relevant documents including on value chain: The Company indicates that in 2021, EDF strengthened its gender diversity goals, including efforts to break the glass ceiling at all hierarchical levels, inspire interest in technical and digital professions among women, and promote balanced gender representation in internal and external communications, including public interventions. Notably, there was no information provided regarding efforts to close the gender wage gap.  
• Not Met: Demonstrates progress through annual reporting  
Score 2  
• Not Met: Women and non-binary people make up at least 40% of the Company's board of directors and executives, or executive board: The Company indicates that in 2022, the Group had a 29% representation of female managers, and the proportion of women in the Management Committees was 30.8%. However, the URD also states the following: ‘On the date of filing of this Universal Registration Document, EDF’s Board of Directors includes nine women, including two of the Directors elected by employees. Women thus make up 58.33% of the Board members taken into consideration to calculate this percentage (i.e. excluding Directors representing...
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</table>
| K.3.PD | Gender wage gap reporting | 0 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Not Met: Has closed gender wage gap: The Company indicates that: ‘The Group has succeeded in virtually eliminating the pay gap between men and women in terms of primary pay, with our progress reflected in equality indexes of between 75 and 95/100. In-depth work were conducted on equal pay for women and men, in partnership with the Institut national des études démographiques (National Institute for Demographic Studies or INED), to identify the sources of the gender pay gap, with a particular focus on the impact of additional pay components. Analyses have been carried out at the Division level, and social dialogue on the subject is ongoing.’ However, it seems that the ratio varies between 75 and 96, which does not seem to show that the gap is closed. Also, evidence is expected to cover the whole company, and current evidence seems to focus in France. [Universal Registration Document 2022, 2023: edf.fr]  
• Not Met: Timebound commitment to close gender wage gap  
• Not Met: Reports information at company level across multiple pay bands |

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<tr>
<th>JT. Just transition</th>
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| JT.1             | Fundamentals of social dialogue and stakeholder engagement in a just transition | 1.5 | The individual elements of the assessment are met or not as follows:  
• Met: Public commitment to engage in social dialogue with appropriate parties for purposes of bipartite or tripartite negotiations  
• Met: Discloses the categories of stakeholders it engages with on a Just Transition and how they were identified.  
• 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 | The individual elements of the assessment are met or not as follows:  
• Not Met: Demonstrates how it engages in social dialogue, especially with unions and with stakeholders, in the development of its transition planning.  
• 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 | The individual elements of the assessment are met or not as follows:  
• Met: Public Commitment to create and provide or support access to green and decent jobs, as part of the low carbon transition.  
• 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.  
• 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 | The individual elements of the assessment are met or not as follows:  
• Met: Public commitment to re-and/or up-skilling workers displaced by the transition to a low carbon economy.  
• Not Met: Disclosure of its process(es) for identifying skills gaps for workers and affected stakeholders, in the context of the low carbon transition.  
• Met: Demonstrates measures taken to provide re-and/or upskilling, training or education opportunities for relevant stakeholders.  
• 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. |

1 Assessment for this sub section has been conducted by the World Benchmarking Alliance, see: https://www.worldbenchmarkingalliance.org/climate-and-energy-benchmark/
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<tr>
<td>JT.5.PD</td>
<td>Fundamentals of social protection and social impact management for a just transition</td>
<td>1</td>
<td>The individual elements of the assessment are met or not as follows:</td>
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<tr>
<td></td>
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<td>• Not Met: Discloses contribution to social protection systems for relevant stakeholders, and expectations on business relationships to contribute to social protection of affected stakeholders.</td>
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<td>• Not Met: Discloses its processes for identifying impacts of low carbon transition on workers' and affected stakeholders' social protection.</td>
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<td>• Met: Demonstrates contribution to addressing the impact of the low carbon transition on workers' social protection.</td>
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<td></td>
<td></td>
<td>• Met: Demonstrates contribution to addressing the impact of the low carbon transition on affected stakeholders' social protection.</td>
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<tr>
<td>JT.6.PD</td>
<td>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</td>
<td>2</td>
<td>The individual elements of the assessment are met or not as follows:</td>
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<tr>
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<td>• Met: Discloses process(es) for aligning its lobbying activities with policies and regulation supporting the just transition.</td>
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<td>• Met: Discloses where its lobbying activities do not align with policies and regulation that support the just transition.</td>
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<td>• Met: Discloses action plan addressing misalignment of lobbying activities with policies and regulation that support just transition.</td>
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<td>• Met: Demonstrates lobbying for just transition and regulations enabling green and decent jobs, reskilling and/or social protection.</td>
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**M. Responses to Serious Allegations (20% of total)**

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| M(0).0         | Serious risks of supply chain forced labour                                   |                  | 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”.

EDF is a project developer active in the solar sector and therefore faces a risk of potential exposure to Uyghur forced labour through its solar panel supply chain. [United Nations General Assembly, 19/07/2022, "Contemporary forms of slavery affecting persons belonging to ethnic, religious and linguistic minority communities - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences": 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] [Sheffield Hallam University, May 2021, "In Broad Daylight - Uyghur Forced Labour and Global Solar Supply Chains": shu.ac.uk] [Business and Human Rights Resource Centre, 02/08/2021, "China: Significant proportion of global solar value chain vulnerable to alleged forced labour in Uyghur Region, says major study": business-humanrights.org]                                                                                                                                                                                                                           |
<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                | • Not Met: The Company states that ‘We apply a strict qualification process to our equipment suppliers, carried out in two stages. First, a documentary audit during which we collect and analyze environmental and social information from suppliers – including information related to Human Rights such as code of business conduct, human rights policy, grievance mechanisms for workers, internal working conditions inspection, and responsible procurement process. If the supplier passes this first qualification stage, all the facilities used to produce our cells and modules are then audited in order to check that their processes are up to EDF Renewables’ standards, including on social aspects. Workers must have legal and decent working conditions, and any form of forced labor shall not be accepted.’ However, this does not indicate independently verified disclosure of the Company’s full solar supply chain. [EDF’s response]                                                                                                                                                                                                 |</p>
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<tr>
<td>M(0).2</td>
<td>If mapping identifies suppliers linked to regions where there is a high risk of forced labour including those identified by UN bodies, the company explains steps taken and how these align with steps expected by the UN Guiding Principles (including reference to assessment of severity of risks, leverage, and crucial nature of business relationships). The company indicates that this information is relevant to all destination markets. • Note: Any disengagement needs to be verified and decision-making to continue engagement with “crucial business relationships” in high-risk area needs to be explained, in line with OHCHR Guidance on Business &amp; Human Rights in Challenging Contexts: “Where a business enterprise has determined that a relationship is indeed “crucial” within the meaning of Guiding Principle 19, and that it will be continuing with the relationship on that basis, it should be transparent with stakeholders and the public at large about the decision-making process used to arrive at that determination and the criteria used, which should be objectively reasonable.”</td>
<td>0</td>
<td>• Not Met: The Company provided a statement to the BHRRC. However, no information was found that meet the criteria on explaining how steps taken align with steps expected by the UN Guiding Principles (including reference to assessment of severity of risks, leverage, and crucial nature of business relationships) at the time this research is conducted. [EDF’s response]</td>
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| M(1).0         | Serious allegation No 1 | 0                | - Area: Land Rights  
- Headline: EDF's Gunaa Sicarú wind farm in Oaxaca registers accusations of violation of indigenous consultation rights  
- Story: The Gunaa Sicarú wind farm project undertaken by the French business group Électricité de France (EDF) in the Zapotec indigenous community of Uniión Hidalgo in Oaxaca has been accused on several occasions of failing to meet international human rights standards related to the right to free, prior, informed and culturally appropriate indigenous consultation.  
Since 2015, the company EDF began various actions for the undertaking of the wind project, including the signing of contracts, a social impact assessment prepared by the company and the conclusion of agreements and permits with government authorities. The indigenous community of Uniión Hidalgo has stated that the process should be consulted in accordance with international human rights and indigenous peoples' standards and has used various remedies to defend their rights, including amparos and the use of the National Contact Point in France.  
A May 2018 court ruling ordered the suspension of the project after finding that the consultation was not carried out in accordance with ILO Convention 169. The subsequent consultation conducted in 2019 has been accused by the community of being illegitimate.  
On 17 August 2021, the UN Working Group on Business and Human Rights approached the Company with the allegation and asked for a response.  
| M(1).1         | The company has responded publicly to the allegation | 0                | The individual elements of the assessment are met or not as follows:  
Score 1  
- Not Met: Public response: The company responded in 2020 stating that it is participating in the current local consultation that is being conducted by the Energy Ministry. The consultation process is regulated and has to be directed by the government. The Company further stated its commitment to continue to work with the community to ensure the project meets their expectations.  
The Company also claims that it has organised several local meetings beyond the ongoing consultation to provide information and address questions under the OECD requests framework.  
However, no response was found to allegations raised by the UN Working Group in 2021. [Business and Human Rights Resource Centre, 03/06/2020. "Mexico: EDF’s Gunaa Sicarú wind farm in Oaxaca registers accusations of violation of the right to indigenous consultation; The company responds": business-humanrights.org] [UN Working Group on Business and Human Rights, 17/08/2021, "Communication to EDF": spcommreports.ohchr.org]  
Score 2  
- Not Met: Detailed response: The response provided by the company is not addressing the allegation of previous failures to... |
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</table>
| M(1).2 | The company has investigated and taken appropriate action | 0.5 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Not Met: Engaged with stakeholders: The Company is participating in a consultation process in order to obtain consent by the community. However, according to the UN Working Group it is unclear whether the Company is engaging with legitimate representatives of the affected stakeholders. [Business and Human Rights Resource Centre, 03/06/2020. "Mexico: EDF’s Gunaa Sicarú wind farm in Oaxaca registers accusations of violation of the right to indigenous consultation; The company responds": [UN Working Group on Business and Human Rights, 17/08/2021, "Communication to EDF": [spcommreports.ohchr.org]  
• Not Met: Identified cause  
Score 2  
• Met: Identified and implemented improvements: In 2018 the case was brought before the French NCP which issued recommendations for the Company. In a follow up statement the NCP evaluated the progress made by the Company regarding the recommendations. It states that ‘The NCP notes that EDF has strengthened its policies and tools contributing to carry out its due diligence; which it welcomes. [...] The NCP notes, however, that the Group has not yet put in place a systematic mechanism of engagement with all stakeholders potentially concerned by its projects, particularly with actors who defend social and cultural interests, but it also notes that works are under way on this subject; which it welcomes. [...] The NCP encourages the Group to finalise these works in order to formalise and harmonise its stakeholder engagement policy for the Group’s projects and its policy on the situation of human rights defenders, in particular for EDF Renewables. [...] The NCP welcomes EDF Renewables Mexico’s commitment to set up « CSR Committees » for its future projects in Mexico, where the Group has several wind farm projects, when the indigenous consultation for Gunaa Sicarú’s project will be over.’ [French NCP, 22/07/2022, "Specific instance “EDF and EDF Renewables in Mexico” Follow-up Statement of the French NCP": [tresor.economie.gouv.fr]  
• Not Met: Stakeholder input to steps taken |
| M(1).3 | The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies) | 0 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Not Met: Provided remedy  
• Not Met: Evidence for lack of Impact or link  
Score 2  
• Not Met: Remedy satisfactory to stakeholders  
• Not Met: Remedy delivered  
• Not Met: Independent remedy process used |
| M(2).0 | Serious allegation No 2 |  | • Area: Right to life  
• Headline: Defender of Unión Hidalgo, opponent of EDF wind farm in Oaxaca, suffers armed attack  
• Story: On 20 February 2022, Edgar Martín Regalado, a member of the Collective in Defence of Human Rights and Communal Property of Unión Hidalgo, was attacked with a firearm while he was travelling home in a motorbike taxi. Edgar had taken part in a press conference in the city of Oaxaca, where he spoke about the actions taken by the Collective against the construction and operation of the Gunaa Sicarú wind farm, which will occupy 4,700 hectares of communal lands and will be operated for 30 years by the company Électricité de France (EDF). |
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<th>Explanation</th>
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| M(2).1         | The Company has responded publicly to the allegation | 0                | The individual elements of the assessment are met or not as follows:  
Score 1  
• Not Met: Public response: The company indicates that it is aware of the incident and understands the authorities have commenced investigations into the events. It further condemned acts of violence and stated its commitment to human rights, including the right of community members to speak out during the consultation process without pressure.  
However, the Company did not address the alleged link to the events. [Business and Human Rights Resource centre, 22/02/2022 - "EDF response about the attack on Oaxaca wind farm opponent": business-humanrights.org]  
Score 2  
• Not Met: Detailed response  

M(2).2 | The Company has appropriate policies in place | 0                | The individual elements of the assessment are met or not as follows:  
Score 1  
• Not Met: Engaged with stakeholders  
• Not Met: Identified cause  
Score 2  
• Not Met: Identified and implemented improvements  
• Not Met: Stakeholder input to steps taken  

M(2).3 | The Company has taken appropriate action | 0                | The individual elements of the assessment are met or not as follows:  
Score 1  
• Not Met: Provided remedy  
• Not Met: Evidence for lack of Impact or link  
Score 2  
• Not Met: Remedy satisfactory to stakeholders  
• Not Met: Remedy delivered  
• Not Met: Independent remedy process used  

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 September 2023.

The use of the label "Not met" in the research does not necessarily mean that the company does not meet the requirements as they are described in the accompanying bullet point short text. Rather, it means that the analysts could not find information in public sources that met the requirements as described in full in the 2023 Renewable Energy & Human Rights Methodology document. It is possible that a Company meets the criteria without yet publishing the relevant evidence of doing so. This may include cases where a company has claimed to meet the criteria in the engagement phase or otherwise but where the public record was still not sufficient to meet the criteria by the relevant cut off dates.

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1 Cut-off dates: 30 June 2023 for companies that did not engage with the benchmark; the expiration of the feedback period (between Aug/Sep 2023) for companies that engaged with the benchmark.
2 Further outreach and engagement with a subset of companies on the specific issue of exposure to forced labour risks was conducted in October 2023.
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 remediying human rights harms as well as other responsible business conduct, it is not currently possible to measure certain human rights harms or other negative impacts directly. As such, a low score in respect of a particular indicator should not be read as implying that harms are necessarily taking place: rather it is a sign that companies have not demonstrated the steps set out in the methodology to reduce the risk of such harms or to uphold other responsible business conduct in the ways described. Conversely, a high score in a particular section or for a specific indicator should not be interpreted as a guarantee of future absence of human rights harm.

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

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

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