

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

**Company name** EDF Renewables  
**Sub-sector** Project developer  
**Overall score** 30% weighted average

| Section score | Weighting | For section                                      |
|---------------|-----------|--|
| 54%           | 20%       | 1. UNGP core indicators                          |
| 20%           | 40%       | 2. Salient human rights risks                    |
| 0%            | 10%       | 3a Response to risk of exposure to forced labour |
| 4%            | 10%       | 3.b Serious allegations                          |
| 55%           | 20%       | 4. Low Carbon Transition Assessment              |

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

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

**Detailed assessment**

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

**A. Policy commitments and governance**

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
| A.1            | Commitment to respect human rights  | 2                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: General HRs commitment: The Code of ethics states that 'EDF has joined the United Nations Global Compact since 2001 and is committed to upholding ten principles relating to human rights, labour, the environment and, since 2004, the fight against corruption. [...] Business should support and respect the protection of internationally proclaimed human rights'. Also, see below, the Code of conduct contains a commitment to the UDHR. [Ethics Charter, 03/2019: <a href="#">edf.fr</a>]</li> <li>• Met: Commitment to UNGPs: EDF and its employees undertake to respect the fundamental principles and rights laid down in the Universal Declaration of Human Rights, the Charter of Fundamental Rights of the European Union, the International Labour Organisation Conventions, the OECD Guiding Principles and the United Nations Convention against Corruption [Code of Conduct, 01/07/2021: <a href="#">edf.fr</a>]</li> </ul> |
| A.2            | Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work | 2                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Commitment to ILO core principles: The Ethics charter states that 'DF has joined the United Nations Global Compact since 2001 and is committed to upholding ten principles relating to human rights, labour, the environment and, since 2004, the fight against corruption'. Then the Company lists these principles including the four ILO core areas. [Ethics Charter, 03/2019: <a href="#">edf.fr</a>]</li> <li>• Met: Expects business relationships 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</li> </ul>   |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
|                |  |                  | 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: <a href="#">edf.fr</a> ]  |
| A.3            | Commitment to remedy                                       | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to remedy adverse HRs impacts: The EDF Group's Commitments and Requirements indicates: '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 remedying the situation'. However, it is not clear if there's an actual commitment to provide access to remedy, as the wording 'with a view to' is not considered a formal commitment to proceed with remediation, according to the methodology wording criteria. [The EDF group's commitments and requirements, 03/2021: <a href="#">edf.fr</a>]</li> <li>• Not Met: Expects business relationships to make this commitment</li> <li>• Not Met: Commitment to collaborate with judicial or non-judicial mechanisms</li> <li>• Not Met: Commitment to work with business relationships on remedy: The 2024 Universal Registration Document indicates: 'Any serious environmental or social breach of EDF group's commitments and requirements will be subject to an in-depth joint analysis between EDF group and the supplier in order to define the actions to be taken to promptly address these gaps. If the Group's whistleblowing system is used, the reported facts are investigated by persons appointed according to the nature of the breach. A dialogue with the supplier is then initiated, and an external audit can also be carried out by EDF. The recommendations and actions made by EDF are then shared with the supplier'. Regarding affected communities, it explains its channels to raise concerns. However, no formal commitment to work with business relationships to remedy adverse impacts which are directly linked to the company's operations, products or services. Commitments are expected to be placed in Company policy documents. [2024 Document d'enregistrement universel (in French), 45658: <a href="#">edf.fr</a>]</li> </ul>  |
| A.4            | Commitment from the top                                    | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• 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 Company's incorporation of ethical and compliance considerations into its works.' [Universal Registration Document 2022, 2023: <a href="#">edf.fr</a>]</li> <li>• Not Met: Describes HRs expertise of Board member</li> <li>• Not Met: Board member/CEO signal importance of HRs in their communications</li> <li>• Not Met: CEO or board incentives</li> </ul>  |
| A.5            | Responsible lobbying and political engagement fundamentals | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• 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: <a href="#">edf.fr</a>] &amp; [Code of Conduct, 01/07/2021: <a href="#">edf.fr</a>]</li> <li>• Not Met: Monetary value of direct political contributions: The 2024 Universal Registration Document indicates: 'The 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 provides no financing to political parties. The Group's Italian and UK subsidiaries have written directly into their codes of conduct the prohibition of financing political parties. It should be noted that such financing is prohibited by law in Belgium. 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. In 2024, only EDF Renewables made payments in the United States, consisting of US\$87,150 in the form of Political Action Committee contributions and US\$270,500 in the form of Corporate Contributions'. However, it</li> </ul> |

| Indicator Code | Indicator name | Score (out of 2) | Explanation  |
|----------------|----------------|------------------|--|
|                |                |                  | <p>is not clear if it only allows contribution exceptionally. Moreover, the Company is expected to state the criteria for making them as well as include a disclosure by country as it only seems to include data on the US Political Engagement Expenditure. [2024 Universal Registration Document, 45658: <a href="#">edf.fr</a>]</p> <ul style="list-style-type: none"> <li>• Met: Monetary value of indirect political contributions: In its 2022 URD, the Company discloses that 'In 2022, EDF Renewables made payments in the United States, consisting of US\$44,190 in the form of Political Action Committee contributions and US\$348,000 in the form of Corporate Contributions'. [Universal Registration Document 2022, 2023: <a href="#">edf.fr</a>]</li> <li>• Not Met: Requirement for third-party lobbyists to comply with the Company's lobbying and political engagement policy (or policies)</li> </ul> |

## B. Embedding respect and human rights due diligence

| Indicator Code | Indicator name   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
| B.1            | Responsibility and resources for day-to-day human rights functions | 2                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• 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. Depending on the agenda, the conclusions of the meetings are reported to the Board of Directors'. This includes human rights. [Universal Registration Document 2022, 2023: <a href="#">edf.fr</a>] &amp; [Vigilance Plan Framework 2022, 04/2023: <a href="#">edf.fr</a>]</li> <li>• 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'. Specifically, 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: <a href="#">edf.fr</a>] &amp; [Vigilance Plan Framework 2022, 04/2023: <a href="#">edf.fr</a>]</li> <li>• Met: Day-to-day resources and expertise allocation in own operations: The Company's website discloses that 'The DECG [The Group Ethics and Compliance Division] manages and coordinates, in liaison with the divisions concerned, the implementation of the Group's ethics and compliance programme [...]. This programme is created to meet the requirements of national and international regulatory authorities and local practices. The programme places all EDF executive directors and, more generally, all employees at the heart of the compliance system [...] In 2016, the DECG set up a network of around fifty Ethics and Compliance Officer (ECOs) at the French entities and internationally. The Ethics and Compliance Officer report directly to the directors of the entities and take part in Management Committee meetings on ethics and compliance matters and on the associated action plans. They have the means and powers necessary to implement and ensure compliance with the requirements of the programme and related policies'. The website states 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: <a href="#">edf.fr/en/the-edf-group/taking-action-as-a-responsible-company/ethics-and-compliance-programme/the-edf-groups-commitment-to-ethics-and-compliance</a>] &amp; [Universal Registration Document 2022, 2023: <a href="#">edf.fr</a>]</li> </ul> |

| Indicator Code | Indicator name                             | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
|                |  |                  | <ul style="list-style-type: none"> <li>• Met: Resources and expertise allocation in supply chain: The Company indicates that 'The salient risks relating to the duty of vigilance concerning suppliers and subcontractors are identified on the basis of a risk mapping covering all EDF purchasing categories within the scope of purchases covered by the Group Purchasing Department [...] The methodology takes into account all matters relating to [...] health and safety, human rights, and ethics and compliance'. The department 'continued the CSR documentary audit campaign on human rights, especially for suppliers in the purchasing categories targeted in international reports on non-compliance with human rights in the fields of textiles, electronics, order-control and IT equipment'. It also adds that 'Buyers are also educated about the importance of the responsible purchasing approach, mainly through their training. Every new purchaser joining the Group Purchasing Department attends a "PURCHASER PASS" training course focusing on the main principles of sustainable purchasing'. [2023 Vigilance Plan, 05/2024: <a href="https://www.edf.fr">edf.fr</a>]</li> </ul>  |
| B.2            | Identifying human rights risks and impacts | 2                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• 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: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Met: Describes process for 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: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Met: Describes 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 "Enterprises 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</li> </ul> |

| Indicator Code | Indicator name                                   | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
|                |  |                  | <p>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 Vigilance Plan'. Also, see below further details. [Universal Registration Document 2022, 2023: <a href="#">edf.fr</a>]</p> <ul style="list-style-type: none"> <li>• Met: Describes how risk identification system is triggered by new circumstances: The Company states that, at pre-development phase, 'for new countries, an assessment is carried out using the Verisk Maplecroft tool or other internal and external sources. Specific due diligence can also be carried out for particular sectors with identified risks'. [2023 Vigilance Plan, 05/2024: <a href="#">edf.fr</a>]</li> </ul>   |
| B.3            | Assessing human rights risks and impacts         | 2                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• 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: <a href="#">edf.fr</a>]</li> <li>• Met: Describes how process applies to supply chain: The Company's Vigilance Plan Framework states: '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: <a href="#">edf.fr</a>]</li> <li>• 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: <a href="#">edf.fr</a>]</li> <li>• 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: <a href="#">edf.fr</a>]</li> </ul> |
| B.4            | Integrating and acting on human rights risks and | 1.5              | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• 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</li> </ul>   |



| Indicator Code | Indicator name                                      | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
|                | impact assessments                                  |                  | <p>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: <a href="#">edf.fr</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how global system applies to supply chain: The 2023 Vigilance Plan describes the 'main prevention, mitigation and monitoring measures implemented', including implementing CSR and supplier commitments through validation of a compliance commitment for all bidders, development of productivity partnerships, incorporation of CSR criteria in tenders, integrating a CSR clause (covering human rights) in purchasing conditions. It also describes how it monitors suppliers. The 2024 Universal Registration Document indicates: 'The EDF group implements a vigilance plan, including a mapping of the risks identified among its suppliers and subcontractors, a risk assessment, and appropriate actions for risk mitigation'. However, this subindicator looks for evidence of proactive actions it takes to face specific salient issues in the supply chain. No details were found in relation to productivity partnerships and what does this entail. [2023 Vigilance Plan, 05/2024: <a href="#">edf.fr</a>] &amp; [2024 Universal Registration Document, 45658: <a href="#">edf.fr</a>]</li> <li>• 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: <a href="#">edf.fr</a>]</li> <li>• 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: <a href="#">edf.fr</a>]</li> </ul> |
| B.5            | Tracking the effectiveness of actions to respond to | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• 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</li> </ul>   |

| Indicator Code | Indicator name                        | Score (out of 2) | Explanation  |
|----------------|---------------------------------------|------------------|--|
|                | human rights risks and impacts        |                  | <p>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. No further evidence was found during last review [Universal Registration Document 2022, 2023: <a href="#">edf.fr</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Example of lessons learned from evaluation effectiveness of actions</li> <li>• Not Met: Involves stakeholders in evaluation effectiveness of actions</li> </ul> |
| B.6            | Communication on human rights impacts | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Provides one example of comms with stakeholders</li> <li>• Not Met: Describes challenges to effective comms and how it is working to address them</li> </ul>   |

### C. Remedies and grievance mechanisms

| Indicator Code | Indicator name  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
| C.1            | Grievance mechanism(s) for workers                              | 1.5              | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism accessible to all workers: The Company's code of conduct contains a section explaining the Company's whistleblowing system which is accessible to all employees. [Code of Conduct, 01/07/2021: <a href="#">edf.fr</a>]</li> <li>• 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: <a href="#">edf.fr</a>] &amp; [Universal Registration Document 2022, 2023: <a href="#">edf.fr</a>]</li> <li>• Met: Describes how workers in supply chain access grievance mechanism: The supplier charter states that it 'provides an accessible whistleblowing system [...] For third parties to report any risk of a serious infringement of human rights and basic freedoms, the environment, health and safety due to the EDF Group's activities'. In future assessments the Company will be expected to demonstrate this applies to all business relationships. [Corporate Social Responsibility charter between EDF and its suppliers, 01/2023: <a href="#">edf.fr</a>]</li> <li>• Met: Expects business relationships to convey expectation to their business relationships: The supplier code states that 'The supplier undertakes to communicate this charter or an equivalent internal charter, whose equivalence has been checked to its employees, subcontractors, suppliers and business relationships wherever it operates'. As indicated above, the charter/code explains access to the Company's whistleblowing system. [Corporate Social Responsibility charter between EDF and its suppliers, 01/2023: <a href="#">edf.fr</a>]</li> </ul> |
| C.2            | Grievance mechanism(s) for external individuals and communities | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• 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: <a href="#">edf.fr</a>]</li> <li>• 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. No further details found during the last review. [Vigilance Plan Framework 2022, 04/2023: <a href="#">edf.fr</a>]</li> <li>• Not Met: Describes how external individuals/communities access grievance mechanism: The 2024 Universal Registration Document indicates: 'Systems to collect and handle complaints, alerts, warnings and claims have been set up at Group level(3) [...] and are accessible for each project. These systems are accessible to any person potentially impacted by the Group's activities and guarantee the</li> </ul>   |

| Indicator Code | Indicator name            | Score (out of 2) | Explanation  |
|----------------|---------------------------|------------------|--|
|                |                           |                  | <p>confidentiality of alerts and callers. Furthermore, systems to collect and process questions are also set up locally. At the international level, each project sets up a request and complaints management mechanism (RCMM)'. However, it is not clear that external individuals and communities have access to it, in order to raise Complaints or concerns about human rights issues at the Company's business relationships (suppliers). [2024 Universal Registration Document, 45658: <a href="#">edf.fr</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Expects business relationships to convey expectation to their business relationships</li> </ul>   |
| C.3            | Remedying adverse impacts | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Describes approach taken to remedy adverse HRs impacts: The Company has provided feedback for this datapoint, however, no evidence found of the approach it took to provide or enable a timely remedy for victims or if no adverse impacts have been identified then the Company describes the approach it would take to provide or enable timely remedy for victims. [2024 Universal Registration Document, 45658: <a href="#">edf.fr</a>]</li> <li>• Not Met: Describes changes to systems, processes and practices to prevent future impacts: The Company has provided feedback for this datapoint, however, no description found of changes to systems, processes and practices to prevent similar adverse impacts in the future for adverse human rights impacts which it has caused or to which it has contributed. [2024 Universal Registration Document, 45658: <a href="#">edf.fr</a>]</li> <li>• Not Met: Describes approach to monitoring/implementing agreed remedy: The Company has provided feedback for this datapoint, however, no evidence found of a description of its approach to monitoring implementation of the agreed remedy. [2024 Universal Registration Document, 45658: <a href="#">edf.fr</a>]</li> </ul> |

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

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

| Indicator Code | Indicator name                                   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
| D.1.PD         | Commitment to respect indigenous peoples' rights | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• 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: <a href="#">edf.fr</a>]</li> <li>• Not Met: Description of process for identifying indigenous persons and customary lands.: The 2024 Universal Registration Document indicates: 'The EDF group recognises the criteria for characterising indigenous peoples included in these standards, including historical and geographic "pre-existence", "cultural distinctiveness", "self-identification", and "non-dominance"'. Similar information is available in the Vigilance Plan, that adds: 'Whenever its operations threaten or affect the livelihood of a community, the Group implements compensation and/or restoration measures for their livelihood matching or exceeding the level prior to its operations. The EDF group is committed to respecting and protecting or safeguarding, in agreement with the populations concerned, any expressions of their culture, religion or heritage present on the land used for its operations'. However, no details were found in relation to the actual operative process followed for identifying Indigenous Peoples and their lands and resources. [2024 Universal Registration Document, 45658: <a href="#">edf.fr</a>] &amp; [2023 Vigilance Plan, 05/2024: <a href="#">edf.fr</a>]</li> <li>• Not Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources</li> <li>• Not Met: Commitment to FPIC: The 2024 Universal Registration Document indicates: 'The EDF group is committed to respecting the specific characteristics and rights of indigenous peoples as defined in the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) and ILO Convention 169, which provides, in particular, 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." The EDF group 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</li> </ul> |



| Indicator Code | Indicator name                           | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
|                |  |                  | Indigenous Peoples), ILO Convention 169 and World Bank standards. [...] The EDF group upholds the individual and collective rights of indigenous peoples and communities, including [...] their right to FPIC [...] in its projects and activities, as defined by ILO Convention 169. [...] Projects are subject to an informed consultation process, respecting the rights and protections guaranteed to indigenous people by national and international legislation. The specific circumstances that require the Free, Prior and Informed Consent (FPIC) of indigenous peoples may notably include the following cases: projects having an impact on the lands and natural resources subject to the traditional ownership or customary use of those peoples; projects requiring the displacement of indigenous peoples; projects with a significant impact on the cultural heritage essential to the identity of these peoples'. However, no evidence was found of reference to the right of Indigenous peoples to define the process by which FPIC is achieved and to withhold consent, regardless of an opposing claim by the government. [2024 Universal Registration Document, 45658: <a href="#">edf.fr</a> ]   |
| D.2.PD         | Engagement with all affected communities | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• 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&amp;S) due diligence is carried out, all stakeholders are identified. Dialogue and consultation are established as far upstream as possible along with the E&amp;S impact assessments, including human rights. Special attention is paid to traditionally marginalized groups (e.g. indigenous peoples, religious minorities, people with disabilities or LGBTQIA+). A public grievance mechanism is set at an early stage to provide fair access to remedy along the project value chain. This allows the deployment of an efficient social "avoid, mitigate, offset" approach to optimize the management of both positive and negative social impacts'. See below details of engagement in last two years. [EDF's Just Transition Principles, 10/2022: <a href="#">edf.fr</a>]</li> <li>• 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&amp;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 Toumangué 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: <a href="#">edf.fr</a>] &amp; [Universal Registration Document 2022, 2023: <a href="#">edf.fr</a>]</li> <li>• Not Met: Examples of engagement refer to marginalised groups and provide additional detail: The 2024 Universal Registration Document indicates that at the international scale, projects development includes a Stakeholder Engagement Plan (SEP): 'In total, more than 140 meetings were organised with stakeholders on the topics of resettlement, livelihood restoration, training, economic development and</li> </ul> |

| Indicator Code | Indicator name                                  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
|                |   |                  | <p>awareness-raising. [...] In Chile, [...] at the Quebrada Locayo Wind Farm and the Fénix Wind Farm (two wind projects under development), EDF Renewables works with consultants in community relations before the start of the project's environmental assessment. In the event that indigenous peoples are identified, EDF Renewables deploys early dialogue with these communities taking into account the standard of ILO Convention 169, for example on the Fénix Wind Farm project with the Mapuche communities'. However, no description found of how affected communities were identified, how consultations took place, if and how traditionally marginalised groups were included (for example, women, Indigenous Peoples, afro descendants, religious minorities, people with disabilities, LGBTQA+, children). The Company has provided additional comments regarding this indicator. However, its content has not been found in publicly available sources. [2024 Universal Registration Document, 45658: <a href="https://www.edf.fr">edf.fr</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: The company meets B2.C, B3.D, B4.D and B.5.C: In order to satisfy the criterium, the Company is expected to meet requirements in B2.C, B3.D, B4.D and B.5.C. The latter datapoint was not met.</li> </ul>  |
| D.3.PD         | Benefit and ownership sharing policy            | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to identify benefit and ownership sharing: Although the Company is committed to invest in local communities and develop different programmes, no details were found in relation to benefit and sharing options. [2024 Impact report, 2024: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Not Met: Commitment includes right to decide own priorities for communities</li> <li>• Not Met: Disclosure of statistics for each project describing demographics of benefit/ownership sharing: The 2024 Universal Registration Document indicates: 'More than 95% of purchases are made in France, mainly due to the division of contracts into lots, which facilitates access to the Group's contracts. 97% of purchases are made in the European Union [...]. In France, the supplier policy also has a long track record of giving preference to relationships with SMEs and companies who employ disabled people only (STPA) and structures for integration through economic activity (SIAE). [...] In 2024, EDF's purchases from the solidarity sector amounted to €17.1 million. [...] Furthermore, the EDF group contributes to the development of France's regions; it pays over €1 billion annually in local taxes to local government. [...] Internationally, as part of the construction of the Nachtigal hydropower plant [...], the project accelerated the socio-economic development of the region in five areas': health, access to water, education and professional development, the development of income-generating activities, and electrification. 'The Project also supported local employment, during the construction phase, with the employment of 1,004 workers, 93% of whom were nationals and 12% were women, and the recruitment, at NHPC, of 126 employees, of whom 95% were nationals and 31% were women. In the field of hydropower in mainland France, the "EDF, one river, one territory" programme, organised through seven regional agencies, has been working since 2012 with the industrial actors of hydropower valleys to facilitate access to EDF Hydro's markets for very small enterprises and SMEs. More than 1,800 companies are listed on supplier purchasing panels. Through loans from their investment fund, this local programme has created or preserved more than 730 jobs in the valleys by granting loans to more than sixty local companies'. However, this subindicator looks for disclosures regarding demographics of its benefits and ownership sharing processes, including any final agreements, percentage of revenue of projects and/or equity shares paid to local communities and Indigenous Peoples. No further evidence found. [2024 Universal Registration Document, 45658: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Not Met: Disclosure how affected communities participated in decision-making</li> </ul> |
| D.4.PD         | Local wind & solar energy access, affordability | 0.6667           | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• 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 and 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 [...]'</li> </ul>   |

| Indicator Code | Indicator name | Score (out of 2) | Explanation   |
|----------------|----------------|------------------|---|
|                |                |                  | <p>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&amp;D teams are also continuing their research on microgrids, to industrialise a reliable, low-cost solution that meets local needs and markets'. [EDF's Just Transition Principles, 10/2022: <a href="https://www.edf.fr">edf.fr</a>] &amp; [Universal Registration Document 2022, 2023: <a href="https://www.edf.fr">edf.fr</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Public support for government policies addressing energy access</li> <li>• Not Met: Including a timebound actions plan and reporting targets</li> </ul> |

## E. Land and resource rights

| Indicator Code | Indicator name                                      | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
| E.1.PD         | Respect for land and natural resource tenure rights | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Policy commitment to respect land ownership/natural resources: The 2024 Universal Registration Document indicates: 'The EDF group is committed to respecting the specific characteristics and rights of indigenous peoples as defined in the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) and ILO Convention 169, which provides, in particular, 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." The EDF group 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. [...] The EDF group 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'. [...] Indigenous people may constitute vulnerable groups among the communities affected by a new development. Projects are subject to an informed consultation process, respecting the rights and protections guaranteed to indigenous people by national and international legislation. The specific circumstances that require the Free, Prior and Informed Consent (FPIC) of indigenous peoples may notably include the following cases: projects having an impact on the lands and natural resources subject to the traditional ownership or customary use of those peoples; projects requiring the displacement of indigenous peoples; projects with a significant impact on the cultural heritage essential to the identity of these peoples'. Although the Company has commitments in relation to Indigenous people and FPIC, no evidence was found of a formal policy statement (placed in a formal policy rather than a periodic report) committing to respecting land rights of legitimate tenure rights holders, including where land and ownership rights are customary and/or not formally recorded. [2024 Universal Registration Document, 45658: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Not Met: Identification of legitimate tenure rights holders: Although identifying rights-holders is part of the Human Rights Impact Assessment, no description was found of the process the company follows to identify them. [2023 Vigilance Plan, 05/2024: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Not Met: Extends expectation to business relationships: The EDF Group's Commitments and Requirements indicates in Chapter 3: '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."' It adds: 'The EDF group's commitments also constitute requirements vis-à-vis its business relations under the conditions provided in chapters 3, 4 and 5. The notion of business relations includes suppliers and subcontractors it has established business relationships with, and partners on projects'. However, it is not clear it expects all relevant parts of its value chain to</li> </ul> |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
|                |   |                  | <p>respecting land rights of legitimate tenure rights holders and to disclose how it identifies legitimate tenure rights holders, with particular attention to vulnerable tenure rights holders. [The EDF group's commitments and requirements, 03/2021: <a href="#">edf.fr</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Steps taken to use leverage to resolve land rights issues or disclosure that no such issues arose: The 2024 Universal Registration Document indicates: 'In 2018, an NGO made a complaint to the OECD's French national contact point (NCP) about the planned Gunaa Sicaru wind farm, to be managed by a subsidiary of EDF Renewables in Mexico. During the course of the OECD mediation process, the EDF group took part in two dialogue meetings with the applicants and provided some responses to the concerns raised. The French NCP closed the matter in spring 2020. On 12 July 2022, the same NCP published a follow-up statement noting the strengthening of EDF's corporate policy and its work done on human rights and engagement with stakeholders. As these measures met its recommendations, the NCP ended its monitoring of the matter. The indigenous consultation process conducted by the Mexican authorities was suspended following an earthquake in 2018, and then due to the Covid-19 pandemic. The consultation process had still not resumed as of 31 December 2024, despite an order from a local judge requiring it to be resumed at the end of August 2024'. It provides further information, however, it is in French and only sources in English are accepted. However, it is not clear the nature of the complaint, if it is related to land rights. Moreover, it is not clear the steps it took to use its leverage to work towards a resolution in line with international standards. [2024 Universal Registration Document, 45658: <a href="#">edf.fr</a>]</li> </ul>  |
| E.2.PD         | Just and fair physical and economic displacement policy implementation including free, prior and informed consent | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to follow IFC PS 5 for physical and economic displacements: Regarding the restoration of livelihoods, at least to pre-project conditions, the EDF Group's Commitments and Requirements indicates: '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'. However, no explicit commitment was found to follow IFC PS 5 when physical and economic displacement for a project is determined to be necessary, and only as a last resort measure. [The EDF group's commitments and requirements, 03/2021: <a href="#">edf.fr</a>] &amp; [2023 Vigilance Plan, 05/2024: <a href="#">edf.fr</a>]</li> <li>• Not Met: Description of compensation for resettlement: The Company has provided a 2018 press release, however, it is considered outdated according to the three-reporting-year timeframe policy. [The Nam Theun 2 Project, 44824: <a href="#">edf.fr</a>]</li> <li>• Not Met: Publishes statistics on numbers affected by relocations (current and planned projects)</li> <li>• Not Met: Publishes regular reviews of living conditions after relocation OR description of approach to physical and economic displacement: 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. No further details found during last review. [Universal Registration Document 2022, 2023: <a href="#">edf.fr</a>]</li> </ul> |

## F. Security and conflict-affected areas

| Indicator Code | Indicator name  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
| F.1.PD         | Operating in or sourcing from conflict-affected areas | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to heightened HRDD in conflict affected areas: The Company has provided comments regarding this indicator. However, its content has not been found in publicly available sources.</li> <li>• Not Met: Steps taken to assess and mitigate these risks with conflict sensitive lens: The Company has provided comments regarding this indicator. However, its content has not been found in publicly available sources.</li> <li>• Not Met: How stakeholders are involved in the process to mitigate risks: The Company has provided comments regarding this indicator. However, its content has not been found in publicly available sources.</li> </ul> |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
| F.2.PD         | Evidence of security provider human rights assessments | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Description of implementation of security approach and example: The 2023 Vigilance Plan reports that 'In terms of the use of security forces, the Group is committed to protecting the safety of its employees and sites in strict compliance with human rights, including those of local communities, and only authorises the use of force for preventive or defensive purposes in a manner proportionate to the nature and severity of the threat'. It adds that depending on the context of the project, it conducts Human Rights Impact Assessments (HRIAs), which's conclusions are intended to be integrated in the life of the project, including the use of security forces'. Risks related to security forces 'close to conflict zones or security regimes' are considered 'intermediate risk'. Similarly, the 2024 Universal Registration Document indicates: 'Depending on the context of the project, a Human Rights Impact Assessment (HRIA) is conducted. It relies on the principles defined by the UN Guiding Principles on business and human rights. These studies place the identification of impacted human rights at the centre of the analysis. [...] They concern both affected communities and workers, the use of security forces [...]'. However, no further details found, including how it ensures respect for human rights during the operation by security forces and providing an example. [2023 Vigilance Plan, 05/2024: <a href="#">edf.fr</a>] &amp; [2024 Universal Registration Document, 45658: <a href="#">edf.fr</a>]</li> <li>• Not Met: Description of monitoring of business partners</li> <li>• Not Met: Local communities engaged in assessment of security</li> <li>• Not Met: Example of working with community on this issue</li> </ul> |

## G. Responsible mineral sourcing

| Indicator Code | Indicator name   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
| G.1.PD         | Responsible sourcing of minerals: arrangements with suppliers                  | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Statement on OECD Guidance aligned due diligence: The 2024 Universal Registration Document indicates: 'EDF Renewables EDF Renewables maps CSR risks across all its strategic supplies, taking into account country risks related to suppliers' production sites, as well as any potential reputational risks. EDF Renewables' responsible procurement is based on two pillars: 1- the supplier qualification process [...]. 2 environmental and social clauses in contracts [...]'. It adds: 'The reciprocal commitments between EDF and its suppliers in terms of social responsibility are enshrined in the social and environmental responsibility charter, a contractual document of the trade. [...] Through this charter, the supplier undertakes to respect the conventions of the [...] the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises'. However, no evidence found that it has a responsible sourcing policy statement committing it to follow the OECD Guidance in the context of responsible sourcing of minerals. [2024 Universal Registration Document, 45658: <a href="#">edf.fr</a>]</li> <li>• Not Met: The policy explicitly covers all minerals</li> <li>• Not Met: Policy expectations of suppliers: The 2024 Universal Registration Document indicates that EDF's vigilance plan follows the OECD Guidelines. It adds: 'In this context, the Group published on its website its duty of vigilance framework entitled "Human rights and fundamental freedoms, health and safety, environment, business ethics: the EDF group's commitments and requirements". This framework brings together [...] the fundamental requirements of its business relationships in terms of respect for human rights and fundamental freedoms [...]'. However, it is not clear it expects its business relationships to require their business relationships to follow the OECD Guidance in the context of responsible sourcing of minerals. [2024 Universal Registration Document, 45658: <a href="#">edf.fr</a>]</li> <li>• Not Met: Contractual requirement for smelters/refiners to follow OECD</li> </ul> |
| G.2.PD         | Responsible sourcing of minerals: mapping and disclosing the supply chain      | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Identification and mapping of suppliers</li> <li>• Not Met: Traceability system for mineral supply chain</li> <li>• Not Met: Discloses smelters/refiners that are most significant part of supply chain</li> <li>• Not Met: Suppliers in higher risk activities, geographies, products</li> </ul>  |
| G.3.PD         | Responsible sourcing of minerals: risk identification in mineral supply chains | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Identification and prioritising of risks in supply chain: The 2024 Universal Registration Document indicates: 'EDF Renewables EDF Renewables maps CSR risks across all its strategic supplies, taking into account country risks related to suppliers' production sites, as well as any potential reputational risks. EDF Renewables' responsible procurement is based on two pillars: 1- the supplier qualification process takes place in two stages: a request for the information phase, during which suppliers answer a list of questions and provide documents about their environmental and societal management, including information about human</li> </ul>   |



| Indicator Code | Indicator name | Score (out of 2) | Explanation   |
|----------------|----------------|------------------|---|
|                |                |                  | <p>rights (policies, codes of conduct, commitments, procedures, supply chain management, and any sanctions), an audit phase on the production sites of the suppliers to verify that the practices adopted correspond to EDF Renewables' standards; 2 environmental and social clauses in contracts: when they enter into the agreement, providers undertake to abide by EDF Renewables environmental and societal requirements and to apply these to their own suppliers and subcontractors'. However, no description found of its processes for identifying and prioritising risks and impacts in its supply chain, in the context of responsible sourcing of minerals, as set out in the OECD Guidance and discloses the risks identified. [2024 Universal Registration Document, 45658: <a href="https://www.edf.fr">edf.fr</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Expectation on suppliers to disclose</li> <li>• Not Met: Processes cover minerals assessed as highest risk</li> </ul> |

## H. Protection of human rights and environmental defenders

| Indicator Code | Indicator name   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
| H.1.PD         | Commitment to respect the rights of human rights and environmental defenders | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• 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: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Not Met: Expectation on business partners in value chain to make this commitment: The Company, in the feedback, explains the steps taken to carry out the environmental and social assessment of suppliers. It also provides information on its whistleblower system, which is also used to report and investigate non-compliance/unlawful behaviour. However, no evidence found that it expects business partners in its value chain to commit to neither tolerate nor contribute to threats, intimidation and attacks (both physical and legal) against human rights defenders. [2024 Universal Registration Document, 45658: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Not Met: Description of how working with HRDs as part of risk assessment and DD: The Company provides information on its whistleblower system. However, it is not clear how it engages with human rights defenders as part of operational processes of risk assessment and due diligence. [2024 Universal Registration Document, 45658: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Not Met: Description of how working with HRDs to create safe and enabling environment: The Company provides information on its whistleblower system. However, it is not clear how it works with human rights defenders to create safe and enabling environments for civic engagement and human rights at local, national or international levels. [2024 Universal Registration Document, 45658: <a href="https://www.edf.fr">edf.fr</a>]</li> </ul> |

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

| Indicator Code | Indicator name    | Score (out of 2) | Explanation  |
|----------------|-------------------|------------------|--|
| I.1.PD         | Health and safety | 2                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: The Company describes the process(es) it has in place to identify its health and safety risks and impacts: The Company indicates that 'The mapping of risks to the health and safety of employees and service providers is carried out by the Health and Safety Division, which is responsible for health and safety management, on the basis of risk analyses carried out by the Group's various entities and subsidiaries, in line with the Group's risk mapping system. Salient risks to the health and safety of employees and service providers are connected to the operation of industrial facilities. Risks concerning consumers and local residents relate to the operation of industrial facilities'. The Company discloses the level of risk criticality for the different health and safety-related salient risks identified. [2023 Vigilance Plan, 05/2024: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Met: Discloses quantitative information on H&amp;S in own operations (injury rate or lost days and fatalities) in last reporting period: The Company reports LTRI and fatal accidents for the last three reporting years [2023 Vigilance Plan, 05/2024: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Met: Expects disclosure of H&amp;S information of relevant business relationships: The supplier code states that 'The EDF Group and the supplier come together in a shared approach to identify critical points in the</li> </ul> |

| Indicator Code | Indicator name                               | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
|                |  |                  | <p>supply chain regarding the principles upheld, define the concrete actions for progress required to control the resulting risks and ensure monitoring [...] Each year the EDF Group and the supplier draw up a review of their actions as part of this approach to check that these principles are being complied with'. The commitments that suppliers have to uphold include 'The EDF Group's Health and Safety policy aims to eradicate severe and fatal accidents by raising both shared awareness of major risks and all the Group's employees' awareness. Taking into account health topics and developing partnership relationships with service providers represents one of the major focuses of this policy'. [Corporate Social Responsibility charter between EDF and its suppliers, 01/2023: <a href="https://www.edf.fr">edf.fr</a>]</p> <ul style="list-style-type: none"> <li>• Met: Targets for H&amp;S performance (including injury rates or lost days and fatalities): The Company reports LTRI target for FY23 (&lt;1.8), which has been achieved (1.7). It also discloses that its target for fatal accidents was 0 and there were 4. In relation to fatalities it indicates the following: 'Four fatal accidents directly linked to professional activities occurred in 2023. These tragedies concerned three employee partners and one employee of the Group. In addition to these four fatal accidents, the EDF group deplores the five fatal illnesses that affected four of its employees and one of its service providers, as well as one fatal commuting accident suffered by one of its employees'. It further states that 'In line with the steps taken within the Group to eradicate serious and fatal accidents, the policy aims to develop a collective safety requirement supported by both Group and subcontractor employees. It reinforces the momentum for progress among service providers (four action sheets or "assets" were drawn up in this regard) [2023 Vigilance Plan, 05/2024: <a href="https://www.edf.fr">edf.fr</a>]</li> </ul>   |
| I.2.PD         | Forced labour risk management                | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Board level oversight over policies on forced labour in supply chain. How relevant stakeholders informed board discussions</li> <li>• Not Met: Capacity building with suppliers: Although Edison, the Company's subsidiary in Italy held meetings 'involving the entire ecosystem of its supply chain stakeholders (suppliers, partners, buyers and colleagues from the company's business units)', no evidence found of capacity building including EDF renewables supply chain, particularly on how to help suppliers to cascade down human rights requirements on forced labour. [2023 Vigilance Plan, 05/2024: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Not Met: Discloses ongoing efforts to prevent and mitigate forced labour in own ops and supply chain</li> <li>• Not Met: Factors to be considered when ending a business relationship incl. responsible disengagement: The Company's CSR charter between EDF and its suppliers states 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. If the supplier refuses to implement an improvement process making it possible to remove these discrepancies or in the event of the proven persistence of these discrepancies after several evaluations or checks, the EDF Group reserves the right to terminate the contract with the supplier. Commitments and requirements include forced labour. However, no information was found on the factors it would consider when deciding whether to end the business relationship if it is not able to adequately use leverage to prevent or mitigate adverse impacts, in the context of forced labour risk management (i.e. relevancy of the supplier, responsible exit). [Corporate Social Responsibility charter between EDF and its suppliers, 01/2023: <a href="https://www.edf.fr">edf.fr</a>]</li> </ul> |
| I.3.PD         | Prohibition of forced labour: Wage practices | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on paying in full and on time in supplier codes and contracts: The EDF Group's Commitments and Requirements indicates 'The EDF group's commitments also constitute requirements vis-à-vis its business relations under the conditions provided in chapters 3, 4 and 5'. In Chapter 3, the Company states: 'The EDF group strives to comply with the ILO's standards related to compensation and fringe benefits. The EDF group is committed to paying decent wages enabling employees and their family to meet their basic needs, and to providing all its employees with adequate welfare protection'. Although the Company provides guidelines on compensation and wages, no evidence found that in its contractual arrangements with suppliers or supplier code of conduct, the Company requires suppliers to pay workers directly, in full and on time. [The EDF group's commitments and requirements, 03/2021: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Not Met: Describes work with suppliers on paying workers regularly, in full and on time</li> <li>• Not Met: Assessment scope of failure to pay workers in full and on time in supply chain</li> </ul>   |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
|                |   |                  | <ul style="list-style-type: none"> <li>• Not Met: Employer Pays Principle in policy for own ops and supply chain: The EDF Group's Commitments and Requirements indicates: 'The EDF group rejects all forms of forced labour, as defined in the ILO's Fundamental Conventions. In particular, on the projects and activities it carries out, the EDF group ensures employees give their free and informed consent before carrying out their duties. The EDF group in particular ensures that intermediaries and employment agencies do not resort to practices that may entail forced labour. The EDF group is committed to never impeding the free movement of workers. In particular, the Group shall not confiscate workers' travel documents, identity documents or any other personal item'. However, although the Company has guidelines to intermediaries and employment agencies, no policy found requiring no job seekers and workers, in own operations or supply chains, should pay any recruitment fees or related costs to secure a job (Employer Pays Principle) and commits to fully reimburse them if they have been required to pay any fees or related costs during recruitment. [The EDF group's commitments and requirements, 03/2021: <a href="https://www.edf.fr">edf.fr</a>]</li> </ul>   |
| I.4.PD         | Prohibition of forced labour: Restrictions on workers | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on free movement in supplier codes and contracts and own operations: The EDF Group's Commitments and Requirements indicates 'The EDF group's commitments also constitute requirements vis-à-vis its business relations under the conditions provided in chapters 3, 4 and 5'. In Chapter 3, the Company states: 'The EDF group is committed to never impeding the free movement of workers. In particular, the Group shall not confiscate workers' travel documents, identity documents or any other personal item'. However, it is not clear this policy is part of contractual arrangements with suppliers. Alternatively, it could be placed on a supplier code of conduct. [The EDF group's commitments and requirements, 03/2021: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Not Met: Describes working with suppliers on free movement of workers</li> <li>• Not Met: Description of implementation and monitoring of this practice: See above, although the Company states that it ensures that its recruitment intermediaries and agencies do not use these practices, no details were found on how it does so. [2023 Vigilance Plan, 05/2024: <a href="https://www.edf.fr">edf.fr</a>]</li> </ul>  |
| I.5.PD         | Freedom of association and collective bargaining      | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: 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, warranties 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'. The EDF Group's Commitments and Requirements indicates 'The EDF group's commitments also constitute requirements vis-à-vis its business relations under the conditions provided in chapters 3, 4 and 5'. In Chapter 3, the Company states: 'The EDF group respects freedom of association and the right to collective bargaining, as defined by the ILO. The EDF group acknowledges that all employees are free to establish and/or join the worker organisation of their choice and does not interfere with this right. The EDF group shall not in any way threaten, harass, punish or discriminate employees on account of their trade union activities, and does not discourage them from joining the organisations of their choice. The EDF group respects the right to collective bargaining and the role of worker organisations in related talks'. Although the suppliers are required to respect Company's commitments including FoA &amp; CB, no evidence was found of explicit requirement in contractual arrangements or supplier code of conducts for suppliers to have measures in place to prevent retaliation or intimidation against workers seeking to exercise these rights. [Universal Registration Document 2022, 2023: <a href="https://www.edf.fr">edf.fr</a>] &amp; [Global Framework Agreement on the EDF Group's Corporate Social Responsibility, 26/06/2018: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Not Met: Describes work with suppliers on FoA/CB</li> </ul> |

| Indicator Code | Indicator name                 | Score (out of 2) | Explanation  |
|----------------|--------------------------------|------------------|--|
|                |                                |                  | <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of restriction of FoA/CB in supply chain: The Company discloses collective bargaining indicators for 2024: Percentage of employees covered by a collective bargaining agreement, 86.1%; Percentage of employees covered by a collective agreement in the EEA, 93.9%; Percentage of employees covered by a collective agreement in France, 94.3%; Percentage of employees covered by a collective agreement outside the EEA. However, no evidence found it its assessment of the number affected by restrictions to freedom of association or collective bargaining in its supply chain. [2024 Universal Registration Document, 45658: <a href="#">edf.fr</a>]</li> <li>• Met: Global Framework Agreement: The Company reports that 'In accordance with the Group's Global Framework Agreement on Corporate Social Responsibility, EDF is committed to respecting and protecting the autonomy and independence of trade unions, in compliance with applicable laws and regulations. It aims to guarantee the effective exercise of trade union rights and recognizes the representative trade union organisations in the Company as contact people and partners. The EDF group respects strict neutrality as to whether or not its employees choose to belong to a trade union, and if so, which trade union they wish to be represented by. Employees are not discriminated against because of their union membership and/ or activities. Facilities are granted to employee representatives in order for them to perform their duties'. [2023 Vigilance Plan, 05/2024: <a href="#">edf.fr</a>]</li> </ul> |
| I.6.PD         | Living wage (in supply chains) | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on living wage in supplier codes and contracts</li> <li>• Not Met: Describes work with suppliers on living wage</li> <li>• Not Met: Description of process to determine living wages with unions: The Company states that 'The EDF group strives to comply with the ILO standards on pay, working conditions and benefits. The Group is committed to paying a living wage, covering the basic needs of its employees and their families, and to providing adequate social security cover for all its employees. When employee accommodation is provided by the Company, the EDF group ensures that decent housing or accommodation is provided in compliance with the ILO standards'. However, no evidence was found on the process to determine a living wage in the locations where it operates. [2023 Vigilance Plan, 05/2024: <a href="#">edf.fr</a>]</li> </ul>  |

## J. Right to a healthy and clean environment

| Indicator Code | Indicator name                                  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
| J.1.PD         | Environmental impact assessment and remediation | 0.6667           | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Conducts EIA 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'. [Universal Registration Document 2022, 2023: <a href="#">edf.fr</a>]</li> <li>• Not Met: Publishes EIA for renewable energy projects</li> <li>• Not Met: Explains when CIA is conducted</li> </ul> |
| J.2.PD         | Life cycle assessment                           | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Expectation for suppliers to conduct regular public life cycle assessments: The Company indicates that for each purchasing category it has 'life cycle analysis sheets', 'which make it possible to assess the environmental challenges of the category throughout the value chain of a product or service, to summarise the maturity of the supplier panel, and to capitalise on the concrete purchasing CSR levers to be used for this category'. However, no evidence was found that the company expects that its wind turbine and/or solar panel manufacturers suppliers undertake regular public life cycle assessments of its primary technologies. [2023 Vigilance Plan, 05/2024: <a href="#">edf.fr</a>]</li> <li>• Not Met: Requires suppliers to have action plans to address adverse impacts identified</li> </ul>   |

## K. Transparency and anti-corruption

| Indicator Code | Indicator name                              | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
| K.1.PD         | Anti-corruption due diligence and reporting | 0.6667           | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Commitment to prohibiting bribes to public officials: The Code of conduct states 'no employee must carry out, promote or authorise any act of corruption or</li> </ul> |

| Indicator Code | Indicator name                                  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
|                |   |                  | <p>influence peddling'. In this context it defines corruption as: 'The act of promising, giving or offering (active corruption) to a third party, but also the act of soliciting or receiving (passive corruption) from a third party, directly or through another person, an improper advantage, for yourself or for others, to facilitate, perform or refrain from performing an act'. Influence peddling is defined as 'influence peddling requires the presence of an intermediary, between the potential beneficiary and the public authority, that uses its influence to obtain or attempt to obtain the desired decision (awards, jobs, contracts or any other favourable decision)'. There is also an explicit prohibition to 'influence the position of public officials by offering them undue advantages or compelling them to infringe on the ethical rules of their organisation [...] use the services of a third party paid directly or indirectly with the aim to achieve a dishonest, non-updated or incomplete position'. [Code of Conduct, 01/07/2021: <a href="#">edf.fr</a>]</p> <ul style="list-style-type: none"> <li>• Not 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'. However, this evidence refers to a period before last three reporting years. The supplier code states that 'The EDF Group undertakes to prevent corruption of every kind, only have business relationships complying with the EDF Group's rules of integrity, set limits on gifts and invitations offered or received to prevent conflicts of interest and fraud of every kind. However, it is not clear what to 'rules of integrity' imply. The 2024 Universal Registration Document contains additional information on its anti-corruption programme and on its revised Code of Conduct. The programme has a third-party integrity control system which 'ensure[s] that there is no risk of exposure to international sanctions, as well as to include, in each contract, a clause giving EDF or its subsidiary the right to immediately terminate the relationship in the event of non-compliance with an international sanctions programme'. No explicit evidence was found that suppliers are subject to the same expectations as the Company (see above, active or passive bribery covering explicitly public officials or other business relationships and their associates or relatives either by the supplier itself or through intermediaries). [Our procurement process at EDF- website, 27/03/2023: <a href="#">edf.fr/en/the-edf-group/dedicated-sections/suppliers/become-a-supplier/our-process</a> ] &amp; [Corporate Social Responsibility charter between EDF and its suppliers, 01/2023: <a href="#">edf.fr</a>]</li> <li>• Not Met: Reports on any complaints on corruption and bribery: The indicators relating to corruption are as follows: 'In 2024, there were no convictions for corruption offences involving legal entities or individuals'. As for its whistleblowing results it indicates: 'In 2024, 449 admissible alerts were recorded (including 93 in the Group whistleblowing system) [...] Among them, 45% of the cases reported relate to harassment/discrimination'. However, no information found regarding any corruption or bribery complaints or concerns received via its grievance mechanism for internal and external individuals and communities. If no corruption reports were made on this platform, the Company is expected to state it. [2024 Universal Registration Document, 45658: <a href="#">edf.fr</a>]</li> </ul> |
| K.2.PD         | Payments to governments & contract transparency | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Publishing a tax CbCR in line with GRI 207-4: The 2024 Universal Registration Document indicates: 'At the end of 2024, as in 2023, the Group electronically transmitted its country-by-country reporting for the 2023 financial year to the French tax authorities, in accordance with the provisions of Article 223 quinquies C of the French General Tax Code'. It also discloses the total amount of taxes paid. However, although the Company indicates it issues a country-by-country reporting to the French tax authorities, no evidence was found of a public country-by-country tax report. [2024 Universal Registration Document, 45658: <a href="#">edf.fr</a>]</li> <li>• Not Met: Disclosure of terms, contracts, agreements for those payments</li> <li>• Not Met: Supports governments to disclose contracts and licenses on renewable energy project in line with EITI</li> <li>• Not Met: Disclosure of payments for land purchase made to governments at project-level</li> </ul>  |



| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|----------------|------------------|-------------|
|----------------|----------------|------------------|-------------|

## L. Diversity, equality and inclusion

| Indicator Code | Indicator name  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
| L.1.PD         | Diversity, equality & inclusion training for management and employees | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Provides mandatory and regular training as per ILO No 190: The Company reports training on diversity ('Experiencing Diversity Together') to raise awareness. 1.825 employees trained in 2023 (18.023 since its launch). Also reports training courses on 'recruiting without discrimination'. Also reports e-learning training to prevent ordinary sexism (14.893 employees since its launch), gender-based sexual violence (919 attendees). However, it is not clear if these covers employees generally (the Company has +100k employees) as some of these are targeted for specific groups of employees, or at least EDF renewables employees. Training is expected to be mandatory and conducted on annual basis. [2023 Registration Document, 2024: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Not Met: Requires suppliers to provide training: The 2024 Universal Registration Document indicates: 'To carry out and deploy its actions and systems, EDF relies on a network of HR correspondents within the company. This network enables the company to address gender equality issues more effectively, by adapting them to very different professional environments according to the business lines and regions, while providing awareness-raising and training actions for all stakeholders (employees, managers, HR, employee representative bodies, etc.)'. However, it is not clear it requires its suppliers to provide trainings on equality, equity, diversity, anti-discrimination. [2024 Universal Registration Document, 45658: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Not Met: Provides materials and access to resources for trainings</li> <li>• Not Met: The trainings include gender-based violence and the Company's policies and mechanisms for addressing it: Regarding its actions to fight against sexism and violence it indicates: 'EDF provides a toll-free hotline, operating seven days a week, for all employees to confidentially seek support and obtain guidance on all harassment and discrimination concerns. A support team (with in-house and external skills) intervenes in investigations carried out when alerts are reported. The EDF group maintains a strict zero-tolerance policy for any form of workplace violence. EDF launched an action to promote employee dialogue on gender diversity and changing mentalities: "Let's talk about gender diversity", the objectives of which are to: dialogue directly with employees on gender and gender equality; gather employees' perceptions of the reality and effectiveness of the actions carried out in their daily work; identify weak signals and priorities for action using collective intelligence'. Also, it 'has created a new awareness-raising tool: "Stop sexist and sexual violence" [...], inspired by the Centre Hubertine Auclert's "violentometer" [...] but specifically tailored to address workplace violence'. This tool is intended for all employees. However, it is not clear how employees at all levels are regularly trained on this. [2024 Universal Registration Document, 45658: <a href="https://www.edf.fr">edf.fr</a>]</li> </ul> |
| L.2.PD         | Gender balance and sensitivity  | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Timebound action plan to integrate gender lens to all relevant documents including on value chain</li> <li>• Not Met: Demonstrates progress through annual reporting</li> <li>• Not Met: Women and non-binary people make up at least 40% of the Company's executives: The Company indicates: 'The EDF group employed 304 women executives, representing 26.7%'. As for the Executive Committee, 4 out of 13 members are women, which represents about 31%. [Executive Committee on website, N/A: <a href="https://www.edf.fr">edf.fr</a>] &amp; [2024 Universal Registration Document, 45658: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Met: Women and non-binary people make up at least 40% of the Company's board of directors: The board of directors is composed of 18 people, nine of which are women. [2024 Universal Registration Document, 45658: <a href="https://www.edf.fr">edf.fr</a>]</li> </ul>  |
| L.3.PD         | Gender wage gap reporting   | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Has closed gender wage gap or timebound commitment: The 2024 Universal Registration Document declares that the gender gap for 2024 is 1.8%. It clarifies: 'The material scope for calculating this indicator includes all employees of the main EDF group companies in France [...] and in the United Kingdom [...] representing more than 80% of the Group's workforce worldwide'. However, the gap does not seem to be closed. Also, evidence is expected to cover the whole company, and current evidence seems to focus in France and in the UK. Alternatively, it could provide a timebound commitment for closing the gender wage gap. No further evidence found. [2024 Universal Registration Document, 45658: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Not Met: Reports information at company level across multiple pay bands</li> <li>• Not Met: Expects business relationships to do the same</li> </ul>   |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|----------------|------------------|-------------|
|----------------|----------------|------------------|-------------|

## JT. Just transition

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
| JT.1           | Fundamentals of social dialogue and stakeholder engagement in a just transition | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Public commitment to engage in social dialogue with appropriate parties for purposes of bipartite or tripartite negotiations: The Company has a Global Framework Agreement in place [2024 Universal Registration Document, 45658: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Met: Discloses the categories of stakeholders it engages with on a Just Transition and how they were identified.: The Company states in its impact report that 'EDF Group is convinced that the energy transition must be accompanied by an in-depth discussion of a more inclusive model of society. True to its values of responsibility and solidarity, the Group is committed to considering the expectations of all its stakeholders, both internal and external. It then reflects about employees social protection. In addition, it states that it has 'ongoing dialogue with the ecosystem' through its 'Stakeholder Advisory Committee' that 'brings together 13 leading figures from civil society with a wide range of backgrounds: environmental and climate specialists, academics, representatives of student groups, economists and players in the social and solidarity economy' 'These complementary experts convey the expectations of civil society and are able to question EDF about its activities'. Finally, in relation to local communities, particularly in isolated areas, 'The Group is committed to developing and maintaining a high level of dialogue with all its stakeholders. This enables it to play an active part in the social and economic development of the regions in which it operates. By working closely with regional institutions, companies and residents, EDF helps to create jobs, support local initiatives and promote renewable energies in the regions'. [2024 Impact report, 2024: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Not Met: Disclosure of steps taken to engage with identified stakeholders and its approach to supporting a just transition.: The 2024 Universal Registration Document indicates: 'On 27 January 2025, the EDF group, along with 18 trade unions representing the Group's employees and two global trade union federations (IndustriAll Global Union and ISP), signed the new 2025-2030 global master agreement on the EDF group's Social and Environmental Responsibility. This agreement commits the entire Group to a set of principles common to all its companies in terms of respect for employees and all stakeholders impacted by the Group's activities and projects and the fight against global warming'. In the context of supporting a just transition for all, the 2025-2030 Global Framework Agreement on Corporate Social and Environmental Responsibility indicates: 'As a responsible employer, the EDF Group recognises the importance of Dialogue, through consultation or collective bargaining, in the development and implementation of actions aimed at ensuring a just transition'. However, no details were found on the actual steps followed following the signing of the GFA. [2024 Universal Registration Document, 45658: <a href="https://www.edf.fr">edf.fr</a>] &amp; [2025-2030 GLOBAL FRAMEWORK AGREEMENT, N/A: <a href="https://industrialunion.org">industrialunion.org</a>]</li> <li>• Not Met: Demonstrates social dialogue and meaningful engagement with stakeholders on all aspects of a just transition.: As indicated above, the Company has signed a Global Framework Agreement on Corporate Social and Environmental Responsibility, along with 18 trade unions representing the Group's employees and two global trade union federations. However, no specific details found on how it proceeds on transition planning; creating and providing or supporting access to green and decent jobs for an inclusive and balanced workforce; retaining and re-and/or up-skilling workers for an inclusive, balanced workforce; social protection and social impact management; and lobbying for policies and regulation supporting a just transition. [2025-2030 GLOBAL FRAMEWORK AGREEMENT, N/A: <a href="https://industrialunion.org">industrialunion.org</a>]</li> </ul> |
| JT.2           | Fundamentals of just transition planning  | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Demonstrates how it engages in social dialogue, especially with unions and with stakeholders, in the development of its transition planning.: The Company has signed a Global Framework Agreement on Corporate Social and Environmental Responsibility, along with 18 trade unions representing the Group's employees and two global trade union federations. However, no evidence found of how it engages both in social dialogue in the development of its just transition planning social dialogue with workers in places where the right to freedom of association and collective bargaining is restricted under law, hence cannot be part of this Agreement, or to other affected stakeholders. The Company submitted a full document without context, therefore it is not clear what it expects to be considered. [2025-2030 GLOBAL FRAMEWORK AGREEMENT, N/A: <a href="https://industrialunion.org">industrialunion.org</a>]</li> </ul>   |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
|                |  |                  | <ul style="list-style-type: none"> <li>• Not Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on workers.</li> <li>• Not Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on affected stakeholders</li> <li>• Not Met: Sets time-bound and measurable indicators to mitigate social impacts of low carbon transition on business relationships.</li> </ul>   |
| JT.3.PD        | Fundamentals of creating and providing or supporting access to green and decent jobs for an inclusive and balanced workforce | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Public Commitment to create and provide or support access to green and decent jobs, as part of the low carbon transition.: The Company states that 'EDF Group is convinced that the energy transition must be accompanied by an in-depth discussion of a more inclusive model of society. True to its values of responsibility and solidarity, the Group is committed to considering the expectations of all its stakeholders, both internal and external. For its employees, it has defined a social protection policy guided by the principles of responsibility and balance between competitiveness and sustainability. Offering them an inclusive working environment, making jobs more attractive and maintaining a high level of social dialogue are all ways to boost performance and retain talented individuals'. [2024 Impact report, 2024: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Not Met: Assesses and discloses the risk of employment dislocation caused by low carbon transition and related impacts on affected stakeholders.: The Company has provided comments regarding this indicator, however, no sources were provided. Only publicly available data is accepted.</li> <li>• Met: Demonstrates measures taken to create and support access to green and decent jobs for affected stakeholders.: The Company states that '3.693 employees redeployed since 2018 to the energy sectors of the future'. The Group makes use of Ecological Transition Contracts, which involve regional stakeholders in a concerted effort to convert the local economic fabric through sustainable projects. This mechanism was used at the Aragon thermal power plant (in the Gard), which has been replaced by a solar power plant. 300 jobs were thus maintained and 38 created'. In addition, it indicates that 'the EDF FAPE fund (Fonds Agir Pour l'Emploi) supports and finances concrete, innovative projects that meet the needs of vulnerable people in the jobs market, with 4 themes: integration, creation of VSEs, mobility, and the emergence of social and solidarity economy projects. Every year, more than 300 projects are supported and almost 3,500 jobs are created or consolidated'. [2024 Impact report, 2024: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Not Met: Demonstrates measures taken to ensure green and decent jobs promoting equality of opportunity for women and vulnerable groups</li> </ul>                              |
| JT.4.PD        | Fundamentals of retaining and re- and/or up-skilling workers for an inclusive and balanced workforce                         | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Public commitment to re-and/or up-skills workers displaced by the transition to a low carbon economy.: The Company states that 'All employees affected by job cuts are given specific support. They benefit from specific schemes in terms of priority mobility (individual personalised support and financial support), external career plans and pre-retirement paid leave'. The Company describes 'sandwich-based redeployment courses': 'The EDF group is continuing to develop retraining courses enabling employees to improve their skills in new jobs. These courses not only target employees positioned in declining jobs but also employees who voluntarily wish to move towards jobs for which there is a need for redeployment. In 2023, 86 employees, including one employee in a redeployment situation, benefited from one of the nine retraining courses provided during the year'. [2023 Registration Document, 2024: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Not Met: Disclosure of its process(es) for identifying skills gaps for workers and affected stakeholders, in the context of the low carbon transition.: The Company has provided comments regarding this indicator, however, no sources were provided. Only publicly available data is accepted.</li> <li>• Met: Demonstrates measures taken to provide re-and/or upskilling, training or education opportunities for relevant stakeholders.: The Company states that 'The EDF group has joined forces with the public authorities and industry players in order to develop initial training in line with its skills challenges. The aim is also to increase the attractiveness of the professions concerned and of the training available, notably through the Université des Métiers du Nucléaire (UMN(1)), by raising awareness of the nuclear professions in collaboration with industry and regional training bodies, in order to adapt the training on offer to the needs of the industry. With regard to initial training, efforts focus on integrating a sector-specific approach into cross functional training courses, from the upper high school level through to post-graduate education, which are not specific to the nuclear industry. In 2023, training modules targeting these skills were integrated into 10 professional and graduate diplomas, as well as 10 engineering schools. For example, a comparable approach is used in the new energy systems sector.</li> </ul> |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
|                |  |                  | <p>Moreover, the new "network schools for the energy transition" were set up in 2023 by the electricity networks sector (electricity network classes in 50 vocational high schools with dedicated teaching and also mentoring by Group employees)'. [2023 Registration Document, 2024: <a href="https://www.edf.fr">edf.fr</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Demonstrates measures taken to ensure that the re-and/or upskilling, training or education opportunities promoting equality of opportunity for women and vulnerable groups. : The 2025-2030 Global Framework Agreement on Corporate Social and Environmental Responsibility discloses information on training it promotes to develop employees' skills. However, no evidence found of measures it takes to ensure that the re- and/or up-skilling, training or education opportunities embed equality of opportunity for women and vulnerable groups. The Company submitted a full document, therefore it is not clear what it expects to be analysed. [2025-2030 GLOBAL FRAMEWORK AGREEMENT, N/A: <a href="https://www.industriall-union.org">industriall-union.org</a>]</li> </ul>  |
| JT.5.PD        | Fundamentals of social protection and social impact management for a just transition | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses contribution to social protection systems for relevant stakeholders, and expectations on business relationships to contribute to social protection of affected stakeholders.: The Company states that 'EDF Group is convinced that the energy transition must be accompanied by an in-depth discussion of a more inclusive model of society. True to its values of responsibility and solidarity, the Group is committed to considering the expectations of all its stakeholders, both internal and external. For its employees, it has defined a social protection policy guided by the principles of responsibility and balance between competitiveness and sustainability. Offering them an inclusive working environment, making jobs more attractive and maintaining a high level of social dialogue are all ways to boost performance and retain talented individuals. The same principles of responsibility and solidarity apply to the Group's external stakeholders: EDF helps its customers to control their energy consumption and is proactively committed to combating fuel poverty. In addition to individual support, EDF also develops community programmes and partnerships to promote universal access to electricity'. See below further details. However, no evidence was found of similar evidence for suppliers' workers and affected stakeholders. The 2025-2030 Global Framework Agreement on Corporate Social and Environmental Responsibility indicates: 'EDF Group undertakes to communicate and promote this agreement to its tier-1 suppliers and subcontractors'. It discloses its requirements: 'Compliance with the national law of the country where a contract is performed; Compliance with international labour and human rights standards; Employee health and safety, including the applicable international standards; Respect for the environment, including reducing the carbon footprint, conserving resources and adapting to climate change; Compliance with EDF Group's Ethics and Compliance policy'. However, no evidence found it expects its business relationships to contribute to social protection of workers and affected stakeholders. The Company submitted a full document, therefore it is not clear what it expects to be analysed. [2024 Impact report, 2024: <a href="https://www.edf.fr">edf.fr</a>] &amp; [2025-2030 GLOBAL FRAMEWORK AGREEMENT, N/A: <a href="https://www.industriall-union.org">industriall-union.org</a>]</li> <li>• Not Met: Discloses its processes for identifying impacts of low carbon transition on workers' and affected stakeholders' social protection.: The 2025-2030 Global Framework Agreement on Corporate Social and Environmental Responsibility discloses information on how the Company manages its risk identification. However, it is not clear its process for identifying the impacts of the low carbon transition on workers' and affected stakeholders' social protection. The Company submitted a full document, therefore it is not clear what it expects to be analysed. [2025-2030 GLOBAL FRAMEWORK AGREEMENT, N/A: <a href="https://www.industriall-union.org">industriall-union.org</a>]</li> <li>• Met: Demonstrates contribution to addressing the impact of the low carbon transition on workers' social protection.: The Company states that 'The Group's other employees [non-statutory] in France are covered by several collective bargaining agreements and can have fringe benefits provided by their own employer. Each employer must ensure that the benefits provided are consistent with the Group policy. For Group companies outside France, even if the regulatory context specific to each country must be taken into account, each entity is required to ensure that the capital paid out in the event of a death under death benefit contracts covers one year's salary at the very least'. [2023 Registration Document, 2024: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Met: Demonstrates contribution to addressing the impact of the low carbon transition on affected stakeholders' social protection.: The Company reports that it operates a network of 230 employees who work with local social action partners and regional authorities to address payment difficulties and energy debt among vulnerable households. [2024 Impact report, 2024: <a href="https://www.edf.fr">edf.fr</a>]</li> </ul> |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
| JT.6.PD        | Fundamentals of advocacy for policies and regulation on green and decent job creation, employee retention, education and reskilling, and social protection supporting a just transition | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Discloses process(es) for aligning its lobbying activities with policies and regulation supporting the just transition.: The Company indicates that 'EDF promotes public policies that encourage actual carbon reduction in the economy. The assessment of its lobbying involves a review process that triggers follow-up actions, where necessary. It notably involves annual reviews and assessments of EDF's partner professional associations, based on their alignment with EDF's, with the Paris Agreement and its goal of limiting global warming to 1.5°C, compared with pre-industrial levels, and with the principles of just transition'. [2023 Registration Document, 2024: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Not Met: Discloses where its lobbying activities do not align with policies and regulation that support the just transition.: No evidence was found of the Company disclosing where its lobbying activities have not been aligned. It, however, does disclose the action plans for addressing such misalignments. See details below. [2023 Registration Document, 2024: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Met: Discloses action plan addressing misalignment of lobbying activities with policies and regulation that support just transition.: It adds that 'If a gap is detected between the principles of an association and what the Group promotes in its raison d'être, the goals of the Paris Agreement and the principles of Just Transition, EDF provides an analysis of the degree to which it can continue to promote its values whilst remaining a member of the association in question. Once this analysis has been completed, if it reveals material misalignments, EDF's position is to encourage the association in question to adopt a more proactive approach in terms of climate advocacy. [...] However, if EDF deems the probability of any positive change to be low, the review process may lead to the Group reconsidering its membership of certain organisations and/or considering joining new ones'. [2023 Registration Document, 2024: <a href="https://www.edf.fr">edf.fr</a>]</li> <li>• Not Met: Demonstrates lobbying for just transition and regulations enabling green and decent jobs, reskilling and/or social protection: The Company reports on its lobbying activities, at national level (France), European level and international level. However, no evidence was found how it particularly lobbies for green and decent job creation, plus either retention, education and reskilling, or social protection. [2023 Registration Document, 2024: <a href="https://www.edf.fr">edf.fr</a>]</li> </ul> |

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

| Indicator Code | Indicator name                              | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
| M(0).0         | Serious risks of supply chain forced labour |                  | <ul style="list-style-type: none"> <li>• Area: Exposure to high risk of forced labour</li> <li>• Story: According to recent data, approximately 35% of the world's polysilicon, and 32% of global metallurgical grade polysilicon, the material from which polysilicon is made, is produced in Xinjiang Uyghur Autonomous Region (XUAR). Investigations by UN bodies, academics and journalists have presented evidence on a number of human rights abuses including the use of forced labour in XUAR. In its July 2022 report to the UN General Assembly, the UN Special Rapporteur on Contemporary Forms of Slavery "regards it as reasonable to conclude that forced labour among Uyghur, Kazakh and other ethnic minorities has been occurring in the Xinjiang Uyghur Autonomous Region of China" and finds that some instances of forced labour in the Region "may amount to enslavement as a crime against humanity". The Special Rapporteur states he "considers that indicators of forced labour pointing to the involuntary nature of work rendered by affected communities have been present in many cases" in the context of "State-mandated systems". Further analysis by independent UN experts concluded that the violations in the Region "may constitute international crimes, in particular crimes against humanity" and have urged China to address their "repeatedly raised concerns about widespread violations of the rights of Uyghurs and other Muslim minorities in the Xinjiang Uyghur Autonomous Region (XUAR) on the basis of religion or belief and under the pretext of national security and preventing extremism". 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.</li> </ul> <p>[United Nations General Assembly, 19/07/2022, "Contemporary forms of slavery affecting persons belonging to ethnic, religious and linguistic minority communities - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences": <a href="https://documents-dds-ny.un.org/doc/UNDOC/GEN/GA/22/07/2022/GA_2207_12372.pdf?OpenElement">documents-dds-ny.un.org</a>] [United Nations Special Procedures, 07/09/2022, "Xinjiang report: China must address grave human rights violations and the world must not turn a blind eye, say UN</p> |



| Indicator Code | Indicator name   | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
|                |  |                  | experts": <a href="https://www.ohchr.org/">ohchr.org</a> ] [International Service for Human Rights, "Repository of United Nations recommendations on human rights in China": <a href="https://www.ishr.ch/">ishr.ch</a> ] [Business and Human Rights Resource Centre, 02/08/2021, "China: Significant proportion of global solar"]  |
| M(0).1         | Publication of independently verified full solar panel supply chains to raw materials level, including names of suppliers and locations for all destination markets  | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Public commitment to full solar supply chain transparency: In response to the BHRRC in 2021, 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 a transparent mapping of the Company's full solar supply chain. [Business and Human Rights Resource Centre, 11/07/2023, "EDF Renewables' response": <a href="https://media.business-humanrights.org/">media.business-humanrights.org</a>]</li> <li>• Not Met: Publication of verified full solar supply chains: In EDF's ESG Pack 2023, the Company discloses that it had 3,200 self-CSR assessing suppliers in 2022. This number increased by 1,000 the following year. No further information is shared about the total number of suppliers and their details. [Pack ESG 2023: <a href="https://www.edf.fr/">edf.fr</a>]</li> </ul> |
| M(0).2         | The company explains steps taken and how these align with steps expected by the UN Guiding Principles (including reference to assessment of severity of risks, leverage, and crucial nature of business relationships) | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Steps taken aligned with UNGPs: The Company provided a statement to the BHRRC in 2021. 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. [Business and Human Rights Resource Centre, 11/07/2023, "EDF Renewables' response": <a href="https://media.business-humanrights.org/">media.business-humanrights.org</a>]</li> <li>• Not Met: Information relevant to all destination markets</li> </ul>  |

### 3.b Serious Allegations (10% of total)

| Indicator Code | Indicator name          | Score (out of 2) | Explanation  |
|----------------|-------------------------|------------------|--|
| M(1).0         | Serious allegation No 1 |                  | <ul style="list-style-type: none"> <li>• Area: Land Rights</li> <li>• Headline: EDF's Gunaa Sicarú wind farm in Oaxaca registers accusations of violation of indigenous consultation rights</li> <li>• Story: The Gunaa Sicarú wind farm project undertaken by the French business group Électricité de France (EDF) in the Zapotec indigenous community of Unión 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.</li> </ul> <p>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 Unión 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.</p> <p>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</p> |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
|                |   |                  | <p>subsequent consultation conducted in 2019 has been accused by the community of being illegitimate.</p> <p>In October 2020 a legal case was launched against EDF under the French duty of vigilance law.</p> <p>On 17 August 2021, the UN Working Group on Business and Human Rights approached the Company with the allegation and asked for a response.</p> <p>A federal court in Oaxaca confirmed the suspension of the project in 2021. In 2022 Mexico's Federal Electricity Commission which operates the national grid, cancelled its power supply contract with EDF for buying the electricity generated in the Gunaa Sicaru project.</p> <p>In 2024 the duty of vigilance lawsuit received permission from the French court to proceed after initial concerns over procedural issues.<br/>[ECCHR, 11/2020, "Case Report - Wind farm in Mexico: French energy firm EDF disregards indigenous rights": <a href="https://ecchr.eu">ecchr.eu</a>] [UN Working Group on Business and Human Rights, 17/08/2021, "Communication to EDF": <a href="https://spcommreports.ohchr.org">spcommreports.ohchr.org</a>] [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": <a href="https://business-humanrights.org">business-humanrights.org</a>] [Mongabay, 26/06/2024, "French court greenlights lawsuit against EDF over wind farm in Mexico": <a href="https://news.mongabay.com">news.mongabay.com</a>]</p>   |
| M(1).1         | The company has responded publicly to the allegation      | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Public 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.</li> </ul> <p>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.</p> <p>However, no response was found to allegations raised by the UN Working Group in 2021.</p> <p>The Company is referencing the French lawsuit in its 2024 Universal Registration Document, however, it is not addressing the allegations made by the community but focuses on the timeline and developments of the lawsuit. Furthermore, the Company has a Website for the project, however, no information about the alleged rights violations could be found there. [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": <a href="https://business-humanrights.org">business-humanrights.org</a>] [UN Working Group on Business and Human Rights, 17/08/2021, "Communication to EDF": <a href="https://spcommreports.ohchr.org">spcommreports.ohchr.org</a>] [EDF, Universal Registration Document 2024.: <a href="https://edf.fr">edf.fr</a>] [EDF, "Gunaa Sicarú Wind Project": <a href="https://gunaa-sicaru.com">gunaa-sicaru.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Detailed response: The response provided by the company is not addressing the allegation of previous failures to comply with ILO convention No 169. Furthermore, no response was found addressing the allegations raised by the UN Working Group in 2021.</li> </ul> |
| M(1).2         | The company has investigated and taken appropriate action | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: 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.</li> </ul> <p>The Company provided comments for this indicator, highlighting the section of the 2024 URD that addresses the litigation and references the specific website for the project. However, the evidence provided was already in use. No further information was found. [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": <a href="https://business-humanrights.org">business-humanrights.org</a>] [UN Working Group on Business and Human Rights, 17/08/2021, "Communication to EDF": <a href="https://spcommreports.ohchr.org">spcommreports.ohchr.org</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Identified cause</li> </ul>   |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
|                |   |                  | <ul style="list-style-type: none"> <li>• 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 vigilance and 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 Gunaá 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": <a href="https://tresor.economie.gouv.fr">tresor.economie.gouv.fr</a>]</li> <li>• Not Met: Stakeholder input to steps taken</li> </ul>   |
| M(1).3         | The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies) | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Provided remedy</li> <li>• Not Met: Remedy satisfactory to stakeholders</li> </ul>  |
| M(2).0         | Serious allegation No 2   |                  | <ul style="list-style-type: none"> <li>• Area: Right to life</li> <li>• Headline: Defender of Unión Hidalgo, opponent of EDF wind farm in Oaxaca, suffers armed attack</li> <li>• 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 Gunaá 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).</li> </ul> <p>At the conference, the presentation of an appeal against the decision of the civil court in Paris to deny the suspension of the construction of the wind farm project on the grounds that it violates the rights of the Zapotec community of Unión Hidalgo, including the right to free, prior and informed consultation, was announced.</p> <p>Edgar affirmed that since they began their struggle against the installation of the project, the threats have been constant, as they regularly set fire to the land behind his house.</p> <p>[ProDESC, 11/02/2022, "URGENT APPEAL: DEFENDERS OF LAND, TERRITORY AND HUMAN RIGHTS OF UNIÓN HIDALGO, OAXACA, AT RISK": <a href="https://prodesc.org.mx">prodesc.org.mx</a>]</p> <p>[LaJornada, 13/02/2022, "Opositor a proyecto eólico en el Istmo denuncia atentado": <a href="https://jornada.com.mx">jornada.com.mx</a>] [Business and Human Rights Resource Centre, 22/02/2022. "Mexico: Defender of Unión Hidalgo, opponent of EDF wind farm in Oaxaca, suffers armed attack": <a href="https://business-humanrights.org">business-humanrights.org</a>]</p> |
| M(2).1         | The Company has responded publicly to the allegation  | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Public 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.</li> </ul> <p>However, the Company did not address the alleged link to the events.</p> <p>The Company provided feedback to the BHRRC pointing to the statement made on the 22nd February 2022. However, the evidence was already in use and for the reasons indicated above does not meet the requirements for this indicator.</p>  |

| Indicator Code | Indicator name                                | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
|                |   |                  | [Business and Human Rights Resource centre, 22/02/2022 - "EDF response about the attack on Oaxaca wind farm opponent": <a href="https://business-humanrights.org">business-humanrights.org</a> ]<br>• 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:<br>• Not Met: Engaged with stakeholders<br>• Not Met: Identified cause<br>• Not Met: Identified and implemented improvements<br>• 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:<br>• Not Met: Provided remedy<br>• Not Met: Remedy satisfactory to stakeholders   |

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

| Indicator Code | Indicator name            | Score (%) | Explanation  |
|----------------|---------------------------|-----------|--|
| n/a            | Emissions targets         | 50        | <ol style="list-style-type: none"> <li>Has the Company set and disclosed a Scope 1+2 short term target?<br/>“These SBTi objectives for 2030 are as follows: 50% reduction, compared with 2017 levels, of Scope 1 and 2 emissions, also including emissions from non-consolidated assets and emissions associated with purchased electricity (i.e. not generated) to be sold to end customers.” Source: Universal Registration Document 2024, page 216. <a href="https://www.edf.fr/sites/groupe/files/2025-04/2025-04-24-edf-urd-2024-en.pdf">https://www.edf.fr/sites/groupe/files/2025-04/2025-04-24-edf-urd-2024-en.pdf</a></li> <li>Has the Company set and disclosed a Scope 1+2 long term target set?<br/>No, without evidence</li> <li>Is the Scope 1+2 short term target aligned with a net zero emissions scenario?<br/>Yes, evidence above</li> <li>Is the Scope 1+2 long term target aligned with a net zero emissions scenario?<br/>No, without evidence</li> <li>Has the Company set and disclosed a Scope 3 short term target?<br/>“for Scope 3, three new targets: reduction of 30% by 2027, 35% by 2030 and 45% by 2035 (vs 2019 levels).[.] In December 2020, the Science Based Targets Initiative (SBTi) validated the Group’s greenhouse gas reduction targets for 2030, which it had set in 2020, as part of a Well Below 2°C trajectory, based on their(1) methodology specifically developed for the electricity sector(2).” Source: Universal Registration Document 2024, pages 15 and 216. <a href="https://www.edf.fr/sites/groupe/files/2025-04/2025-04-24-edf-urd-2024-en.pdf">https://www.edf.fr/sites/groupe/files/2025-04/2025-04-24-edf-urd-2024-en.pdf</a></li> <li>Has the Company set and disclosed a Scope 3 long term target?<br/>Scope 3 emissions (in MtCO2e) Net Zero 2050. Source: Universal Registration Document 2024, pages 215. <a href="https://www.edf.fr/sites/groupe/files/2025-04/2025-04-24-edf-urd-2024-en.pdf">https://www.edf.fr/sites/groupe/files/2025-04/2025-04-24-edf-urd-2024-en.pdf</a></li> <li>Is the Scope 3 short term target aligned with a net zero emissions scenario?<br/>Yes, evidence above</li> <li>Is the Scope 3 long term target aligned with a net zero emissions scenario?<br/>No, without evidence</li> </ol> |
| n/a            | Share of Low Carbon CAPEX | 59        | Low Carbon CAPEX: “In 2024, 59% of the Group’s investments were aligned with the European green taxonomy (64% in 2023), i.e. an amount of € 15.6 billion, including notably 26% in investments in nuclear in the European Union, 22% in network activities and 10% in renewable energy generation facilities (solar, wind, hydropower). [.]The Group has an active “green” financing policy using various instruments. Approximately 11.7 billion of equivalent financing was issued during the year, mainly to refinance investments made before 2024 (approximately 0.5 billion of green financing was allocated to nuclear and renewable investments made in 2024). By way of illustration, EDF issued three dedicated green bonds on 17 June 2024 to: — the existing nuclear fleet for an  |

|             |  |    |   |
|-------------|--|----|---|
|             |  |    | <p>amount of 1 billion € —new renewable and hydropower generation capacities for an amount of 750 million € —electricity distribution, linked in particular to adapting the network to the needs of the energy transition for an amount of 1,250 million €.</p> <p>Total CAPEX: 31/12/2024 CAPEX 26,431 (in millions of euros).</p> <p>Source: Universal Registration Document 2024, pages 256, 261 and 262.<br/> <a href="https://www.edf.fr/sites/groupe/files/2025-04/2025-04-24-edf-urd-2024-en.pdf">https://www.edf.fr/sites/groupe/files/2025-04/2025-04-24-edf-urd-2024-en.pdf</a></p> |
| Final score |  | 55 |   |

## Disclaimer

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

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

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

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

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

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



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