

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

Company name Goldwind
Sub-sector Wind turbine manufacturer
Overall score 2% weighted average

Section score	Weighting	For section
4%	20%	1. UNGP core indicators
3%	40%	2. Salient human rights risks
0%	10%	3.a Response to exposure of risk to forced labour
0%	10%	3.b Serious allegations
N/A	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	1	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> Met: General HRs commitment: Goldwind's Commitment to Human Rights policy was approved in February 2021. It states that 'Goldwind is committed to respecting and supporting internationally recognized human rights standards and principles'. [Commitment to Human Rights, 08/02/2021: goldwind.com] Not Met: Commitment to UNGPs
A.2	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> Not Met: Commitment to ILO core principles: Goldwind's Commitment to Human Rights policy does not make specific reference to ILO standards, but it contains references to child labour, forced labour and non-discrimination. However, it does not address other labour rights such as the freedom of association and the right to collective bargaining. [Commitment to Human Rights, 08/02/2021: goldwind.com] Not Met: Expects business relationships to commit to ILO core principles: The Company states that 'Since its founding more than 25 years ago, Goldwind has respected fundamental human rights and fair labour practices, setting high standards internally and within its supply chains. We strictly prohibit the use of any form of child labour, forced labour, bonded labour or the trafficking of persons throughout our company operations and within our supply chain.' However, no evidence is found that the Company has a publicly available policy statement that expects its business relationships to commit to respecting the human rights that the ILO has declared to be fundamental rights at work. Goldwind Australia also states in its Supplier Social Responsibility Code of Conduct that 'The Supplier shall respect the human dignity and basic human rights of all its Employees. This Code of Conduct applies to all Employees of the Supplier, including temporary workers,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			foreign workers, apprentice.’ However, no evidence is found that the Company has an expectation for its business relationship to commit to respecting the human rights that the ILO has declared to be fundamental rights at work. Furthermore, it is unclear if the documents published by Goldwind Canada and Goldwind Australia apply to the whole group. [GST Canada Supply Chains Act Report: goldwind.com] & [Goldwind_Australia_Supplier_Social_Responsibility_Code_of_Conduct: goldwind.com]
A.3	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Commitment to remedy adverse HRs impacts: The Company states that ‘the Company has clearly defined the remedy rules for violations of child labor and standardized the channels for employees to file complaints.’ However, no evidence is found the Company has a publicly available policy statement to remedy all adverse human rights impacts on individuals, workers and communities. [2023 Sustainability Report: goldwind.com] • Not Met: Expects business relationships to make this commitment • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms • Not Met: Commitment to work with business relationships on remedy
A.4	Commitment from the top	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Board level responsibility for HRs: The Company states that it has a Sustainable Development Management Committee. The Chairman Wu Gang chairs the Committee, with executive directors and some senior executives as its members. The Committee is responsible for managing and supervising all sustainable development efforts and reporting to the Board of Directors on a regular basis. However, no evidence is found that the Company has a board level responsibility specific for human rights issues. [2023 Sustainability Report: goldwind.com] • Not Met: Describes HRs expertise of Board member • Not Met: Board member/CEO signal importance of HRs in their communications • Not Met: CEO or board incentives
A.5	Responsible lobbying and political engagement fundamentals	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Publicly available policy statement(s) (or policy(ies)) setting out lobbying and political engagement approach. • Not Met: Monetary value of direct political contributions • Not Met: Monetary value of indirect political contributions • Not Met: Requirement for third-party lobbyists to comply with the Company's lobbying and political engagement policy (or policies)

B. Embedding respect and human rights due diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Senior responsibility for HRs implementation and decision making: The Company states that ‘The General Manager of Legal and Corporate Services is responsible for the overall monitoring and tracking of modern slavery risks across Goldwind Australia’s operations with the Head of ESG role to provide support with dedicated oversight and governance into this important area’. However, no evidence is found that the Company has a senior manager role for human rights issues at company group level. [2023 Modern Slavery Statement: goldwind.com] • Not Met: Describes day-to-day responsibility for implementing HRs commitments • Not Met: Day-to-day resources and expertise allocation in own operations • Not Met: Resources and expertise allocation in supply chain
B.2	Identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Describes process of identifying risks in own operations: The Company states that ‘A large effort has been placed in the reporting period to operationalise our Modern Slavery Risk Management Framework that helps us take a risk-based approach to effectively assess our inherent risk areas (see section above) and sets out a clear framework and approach on how, as a business, we utilise our training, risk identification process and action plans including contractual clauses and formal acceptance of our Supplier Social Responsibility Code of Conduct to manage supplier modern slavery risks.’ The Company also reports that ‘Together in partnership with the MS Specialist in 2022, we identified areas of heightened risk based on a risk assessment of our operations and supply chain. It is important to note that these areas represent inherent modern slavery risks only.’ However, no evidence is found that the Company has a process to identify all human rights risks and impacts. The statement does not seem to cover the whole Group. [2023 Modern Slavery Statement: goldwind.com] • Not Met: Describes process for identifying risks in business relationships: The Company states that ‘We acknowledge that there are inherent forced labour and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>child labour risks in our supply chain and that we must proactively identify, assess, address, and mitigate these risks as part of our responsibility to respect human rights.' The Company also reports that 'The Companies did not identify any instances of forced labour or child labour within their operations or supply chains during the Reporting Year.' However, no evidence is found that the Company has a process in place to identify its human rights risks, not only forced labour and child labour, through all its supply chains. [GST Canada Supply Chains Act Report: goldwind.com]</p> <ul style="list-style-type: none"> • Not Met: Describes risk identification system incl. stakeholder consultation: The 2022 Sustainability Report states that "[t]he Company has set up an all-round identification process on relevant issues, and determines the disclosure content and scope through communication with stakeholders and evaluation by management-level personnel, etc." But there is no further elaboration on how it engages with stakeholders. [2022 Sustainability Report, 2023: goldwind.com] • Not Met: Describes how risk identification system is triggered by new circumstances
B.3	Assessing human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes assessment process and discloses salient HRs risks: The Company states that Goldwind regularly assess the effectiveness of its anti-forced labour and anti-child labour controls. As part of the SRM System, Goldwind Science & Technology regularly reviews and audits its policies and procedures related to forced labour and child labour and their implementation.' However, no evidence is found that the Company has a group level process to assess all human rights risks and discloses its salient human rights risks. [GST Canada Supply Chains Act Report: goldwind.com] • Not Met: Describes how process applies to supply chain: The Company states that 'In accordance with the Code for Social Responsibility Evaluation of Suppliers of Wind Turbine Components and the Code of Conduct on Social Responsibility for Suppliers, Goldwind has set up a unique supplier social responsibility evaluation system to comprehensively evaluate suppliers' compliance with laws, employees' rights and interests, health and safety, environmental protection, and business ethics. The audit criteria cover three categories of issues: zero-tolerance issues, priority issues, and common issues. Zero-tolerance issues include unacceptable issues such as forced labour, child labour, inhumane treatment, corruption, and fatal safety accidents, which, if found, will lead to the immediate termination of all cooperation.' However, no evidence is found that the Company has a process to assess its human rights risks and impacts in all its supply chain. [2023 Sustainability Report: goldwind.com] • Not Met: Public disclosure of results of HRs risk assessment • Not Met: Describes how assessment involved affected stakeholders: According to the 2022 Sustainability Report, "[d]uring the development and construction of domestic wind farms, the Company has established such systems as Management measures for environmental and social risk evaluation and action planning, Management measures for cultural heritage, Management measures for ethnic minority affairs, and Management Measures for Stakeholder Consultation and Participation, stipulating the principles governing the business operation activities of wind power projects and establishing a working mechanism for communication, consultation and engagement with stakeholders such as community residents and government agencies, so as to achieve joint development of business and local communities. During the construction and operation of wind farms and water plants, the Company keeps in communication with local governments, community residents and other partners, communicating the latest progress of projects, and collecting and responding to the requests of all parties. It takes the initiative to help neighboring communities where the projects are located to solve their living problems, improve their quality of life, provide living convenience and create job development opportunities. For example, it helps remote village and town communities build roads and bridges to facilitate community transportation while accommodating project transportation needs; it helps repair canals and cultivate land to improve local living and production conditions; it helps villages and towns build distributed new energy sources to solve the problem of difficult access to electricity for residents; it provides jobs for local residents, employing local people as operation and maintenance workers, drivers, and cooks, for example, to raise their income." The statement falls short of describing how affected stakeholders are involved in the risk assessment process. [2022 Sustainability Report, 2023: goldwind.com]
B.4	Integrating and acting on human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes system to prevent, mitigate and remediate HRs issues • Not Met: Describes how global system applies to supply chain

Indicator Code	Indicator name	Score (out of 2)	Explanation
	risks and impact assessments		<ul style="list-style-type: none"> • Not Met: Example of actions decided on at least 1 salient HRs issue • Not Met: Describes how stakeholders involved in decisions about actions taken
B.5	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes system for evaluation effectiveness of actions • Not Met: Example of lessons learned from evaluation effectiveness of actions • Not Met: Involves stakeholders in evaluation effectiveness of actions
B.6	Communicating 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"> • Not Met: Provides one example of comms with stakeholders: According to the 2022 Sustainability Report, "[d]uring the development and construction of domestic wind farms, the Company has established such systems as Management measures for environmental and social risk evaluation and action planning, Management measures for cultural heritage, Management measures for ethnic minority affairs, and Management Measures for Stakeholder Consultation and Participation, stipulating the principles governing the business operation activities of wind power projects and establishing a working mechanism for communication, consultation and engagement with stakeholders such as community residents and government agencies, so as to achieve joint development of business and local communities. During the construction and operation of wind farms and water plants, the Company keeps in communication with local governments, community residents and other partners, communicating the latest progress of projects, and collecting and responding to the requests of all parties. It takes the initiative to help neighboring communities where the projects are located to solve their living problems, improve their quality of life, provide living convenience and create job development opportunities. For example, it helps remote village and town communities build roads and bridges to facilitate community transportation while accommodating project transportation needs; it helps repair canals and cultivate land to improve local living and production conditions; it helps villages and towns build distributed new energy sources to solve the problem of difficult access to electricity for residents; it provides jobs for local residents, employing local people as operation and maintenance workers, drivers, and cooks, for example, to raise their income." The statement falls short of specifying the human rights impacts raised by affected stakeholders. [2022 Sustainability Report, 2023: goldwind.com] • Not Met: Describes challenges to effective comms and how it is working to address them

C. Remedies and grievance mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism accessible to all workers: The Company states 'The Company has developed a reporting and investigation procedure, made available channels such as complaint and reporting phone lines and mailboxes, and arranged for dedicated personnel to record and handle them in a timely manner. In case of a report or a complaint, the Company promptly informs the whistleblower and all persons receiving the report that the matter is being handled, and cooperates with relevant departments and external experts to carry out investigations and take the initiative to provide feedback to the parties concerned and the whistleblower on the progress of the investigations. The Company encourages all employees and insiders to report violations of anti-corruption rules. It has published the hotline and email address for complaints and reporting in places such as its official website and office areas, and even sets up complaint boxes to facilitate stakeholders' reporting of actual or suspected corruption incidents.' However, no evidence is found the channels are also available for reporting human rights issues. [2023 Sustainability Report: goldwind.com] • Not Met: Grievance mechanism available in appropriate languages and workers made aware • Not Met: Describes how workers in supply chain access grievance mechanism • Not Met: Expects business relationships to convey expectation to their business relationships
C.2	Grievance mechanism(s) for external	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism accessible to all external individuals and communities: Seen as above. The Company has channels for reporting violations of anti-corruption rules. However, no evidence is found the channels are available for external stakeholders (individuals and communities) to report violations of human

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	individuals and communities		rights. Goldwind Australia states that 'The Supplier shall establish an anonymous complaint mechanism for managers and employees to report concern or grievance in their work, ensure this mechanism is clearly and frequently communicated to all of its Employees and contractors and otherwise comply with all applicable whistleblower laws and regulations.' However, no evidence found the Company has such a mechanism for all its business operations. [2023 Sustainability Report: goldwind.com] & [Goldwind_Australia_Supplier_Social_Responsibility_Code_of_Conduct: goldwind.com] <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware • Not Met: Describes how external individuals/communities access grievance mechanism • Not Met: Expects business relationships to convey expectation to their business relationships
C.3	Remedying adverse impacts	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Describes approach taken to remedy adverse HRs impacts • Not Met: Describes changes to systems, processes and practices to prevent future impacts • Not Met: Describes approach to monitoring/implementing agreed remedy

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

D. Indigenous Peoples' and Affected Communities' Rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.M	Commitment to respect indigenous peoples' rights	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Expectation of project developer clients to have a public commitment to respect indigenous rights • Not Met: Commitment to only work with business partners that respect FPIC
D.2.M	Engagement with all affected communities	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Describes how local communities identified and engaged in the last two years: The Company states 'When selecting the location and laying out wind turbines, the surrounding landscape features are fully considered, and active consultations are held with the local community to build wind farms in conjunction with the layout of local industrial planning, thus minimizing the impact on the surrounding landscape. Painting is customized for wind turbines and multicolored wind turbines are available, so that they are blended perfectly with the culture and the environment. [...] The Company attaches importance to maintaining good relationships with the communities where it operates, pays attention to the rights and interests of the communities, strengthens community communication, and solves the needs of the communities. At the same time, the Company organizes and participates in a variety of local cultural activities to build positive and harmonious relationships between the company and the local communities, and works with the communities to promote sustainable development.' However, no information was found on how the company identified local communities in the last two years.' [2023 Sustainability Report: goldwind.com] <ul style="list-style-type: none"> • Not Met: Provides two examples of engagement with communities • Not Met: Examples of engagement refer to marginalised groups and provide additional detail • Not Met: The company meets B2.C, B3.D, B4.D and B.5.C
D.3.M	Benefit and ownership sharing policy	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Rewards for clients that have a commitment to identify potential benefit and ownership sharing • Not Met: Rewards for clients for disclosing statistics for each project (demographics of ownership sharing)
D.4.M	Local wind & solar energy access, affordability	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Actions taken to support access and affordability of renewable energy in the value chain: The Company state that 'As a globally trusted strategic partner in clean energy, Goldwind is committed to promoting energy transformation, bringing affordable, reliable, and sustainable energy to the world, and building a "sustainable and better" future.' However, no evidence is found on the Company's actions to support access and affordability of renewable energy in the communities. [2023 Sustainability Report: goldwind.com] <ul style="list-style-type: none"> • Not Met: Public support for government policies addressing energy access • Not Met: Including a timebound action plan and reporting targets on supporting energy access and affordability in consultation with communities

Indicator Code	Indicator name	Score (out of 2)	Explanation
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E. Land and resource rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
E.1.M	Respect for land and natural resource tenure rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Expectation for clients to have commitment to respect land ownership/natural resources as in VGGT: The 2022 Sustainability Report indicates that the Company "considers labor and working conditions, resource efficiency and pollution prevention, land acquisition and involuntary relocation, sustainable management of bio-natural resources, ethnic minority affairs, and cultural heritage management as important elements of risk identification, and identifies, evaluates and manages them in accordance with the risks of major matters and routine risks in investment decisions." No evidence found of an expectation for project developer clients to have a public commitment to respecting land rights of legitimate tenure rights holders as set out in the VGGT. [2022 Sustainability Report, 2023: goldwind.com] • Not Met: Steps taken to use leverage to resolve land rights issues
E.2.M	Just and fair physical and economic displacement policy implementation including free, prior and informed consent	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Expectations for clients to commit to IFC PS 5 for physical and economic displacements: No reference to a commitment to follow IFC Performance Standard 5. The 2022 Sustainability Report only indicates that the Company "considers labor and working conditions, resource efficiency and pollution prevention, land acquisition and involuntary relocation, sustainable management of bio-natural resources, ethnic minority affairs, and cultural heritage management as important elements of risk identification, and identifies, evaluates and manages them in accordance with the risks of major matters and routine risks in investment decisions." [2022 Sustainability Report, 2023: goldwind.com] • Not Met: Steps taken to use leverage

F. Security and conflict-affected areas

Indicator Code	Indicator name	Score (out of 2)	Explanation
F.1.M	Operating in or sourcing from conflict-affected areas	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to heightened HRDD in conflict affected areas • Not Met: Steps taken to assess and mitigate these risks with conflict sensitive lens • Not Met: How stakeholders are involved in the process to mitigate risks
F.2.M	Evidence of security provider human rights assessments	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Description of implementation of security approach and example • Not Met: Description of monitoring of business partners • Not Met: Local communities engaged in assessment of security • Not Met: Example of working with community on this issue

G. Responsible mineral sourcing

Indicator Code	Indicator name	Score (out of 2)	Explanation
G.1.M	Responsible sourcing of minerals: arrangements with suppliers	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Policy statement on OECD Guidance aligned due diligence: The Company states that 'Goldwind follows the procurement principles of "openness and transparency, fair competition, compliance with laws and regulations, and honesty and trustworthiness", and continuously improves the supply chain management system. It has formulated such management rules as the Procurement Management System and the Supplier Approval Management System, which clearly define the procurement management methods and requirements for exploring new suppliers, so as to avoid potential risks in the supply chain, and ensure fair, just and open cooperation with suppliers. During the reporting period, the platform strengthened the development of suppliers' social responsibility management and organized suppliers to sign the Social Responsibility Commitment Letter and the Transparent Cooperation Commitment Letter, requiring suppliers to be committed to complying with such social responsibility requirements as workers' rights and human rights, health and safety, environment, and business ethics.' However, no evidence found on a responsible sourcing policy statement committing it to follow the OECD Guidance. [2023 Sustainability Report: goldwind.com] • Not Met: The policy explicitly covers all minerals • Not Met: Policy expectations of business relationships • Not Met: Contractual requirement for smelters/refiners to follow OECD
G.2.M	Responsible sourcing of minerals:	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Identification and mapping of suppliers • Not Met: Traceability system for mineral supply chain • Not Met: Discloses smelters/refiners that are most significant part of supply chain

Indicator Code	Indicator name	Score (out of 2)	Explanation
	mapping and disclosing the supply chain		<ul style="list-style-type: none"> • Not Met: Suppliers in higher risk activities, geographies, products
G.3.M	Responsible sourcing of minerals: risk identification in mineral supply chains	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Identification and prioritising of risks in supply chain • Not Met: Description of process to identify smelters/refiners and whether they carry out DD • Not Met: Disclosure of qualified smelters/refiners • Not Met: Processes cover minerals assessed as highest risk

H. Protection of human rights and environmental defenders

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.1.M	Health and safety	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Discloses quantitative information on H&S in own operations (injury rate or lost days and fatalities) in last reporting period: The Company reports that 'In 2023, the number of employee deaths due to work is 0, the number of major safety accidents is 0, and the number of occupational disease onset is 0. Lost days due to work injury were 334 in 2023.' [2023 Sustainability Report: goldwind.com] • Not Met: Expects disclosure of H&S information of relevant business relationships: No clear reference to supplier or other business relationships expectation when it comes to quantitative information on health and safety. The Commitment to Human Rights policy document only states that "Goldwind's Administrative Measures for Qualified Suppliers of Wind Turbine Components require that our suppliers comply with environmental regulations, safe production, and occupational health management to supplier evaluation standards." [Commitment to Human Rights, 08/02/2021: goldwind.com] • Not Met: Targets for H&S performance (including injury rates or lost days and fatalities) • Not Met: The Company describes the process(es) it has in place to identify its health and safety risks and impacts: The Company states that 'To protect the occupational health and safety of every employee, the Company has set up detailed occupational health records and employee health monitoring files. Besides, the Company inspects and evaluates the risk factors of occupational diseases and examines hazards on a regular basis.' However, no further details found on a process to identify its health and safety risks. [2023 Sustainability Report: goldwind.com]
I.2.M	Forced labour risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Board level oversight over policies on forced labour in supply chain. How relevant stakeholders informed board discussions • Not Met: Capacity building with suppliers • Not Met: Discloses ongoing efforts to prevent and mitigate forced labour in own ops and supply chain: Reference to forced labour in overall supplier social responsibility system, but no specific details on how forced labour is prevented and mitigated. The 2022 Sustainability Report however outlines the general supplier policy, which contains references to forced labour: "The Company has established a social responsibility assessment system for suppliers, comprehensively evaluating suppliers' performance in labor rights, health and safety, environment, business ethics and management system, and making it a zero-tolerance item to be punished by labor inspection department for forced labor, child labor and bribery of Goldwind employees. If a supplier is found to exhibit any zero-tolerance issue in the course of social responsibility assessment, the cooperation will be terminated immediately. Meanwhile, more than 20 primary items are defined, mainly including the establishment of child labor prevention identification and rescue procedures, the provision of humane working environment, the establishment of work procedures to avoid discrimination against employees, and the management of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>conflict minerals. If a supplier is found to exhibit any primary issue, it will be required to rectify it within two months; if an ordinary issue is detected, the supplier will be required to rectify it within three months. If a supplier fails to pass the rectification within the time limit, it will be removed from the list of qualified suppliers and cancel the cooperation qualification. The Company adopts methods of supplier self-inspection and random checks by the Company to evaluate the social responsibility performance of suppliers, and expands the scope and number of audits year by year, with the priority put on auditing suppliers of blades, castings, bearings and other core components, as well as key suppliers with large purchase amounts. In 2022, the Company hired an international authority as an independent third party to complete social responsibility audits of 215 suppliers in China (manufacturing), accounting for 85% of the total number of the Company's major wind turbine component suppliers (manufacturing). Three suppliers were removed from the partnering supplier list because their performance in environmental protection and other aspects did not meet Goldwind's requirements and they failed to rectify the faults afterwards. The annual percentage of suppliers passing social responsibility audits stood at 98.6%." [2022 Sustainability Report, 2023: goldwind.com]</p> <ul style="list-style-type: none"> • Not Met: Factors to be considered when ending a business relationship incl. responsible disengagement: The 2022 Sustainability Report however outlines the general supplier policy, which contains references to forced labour: "If a supplier is found to exhibit any primary issue, it will be required to rectify it within two months; if an ordinary issue is detected, the supplier will be required to rectify it within three months. If a supplier fails to pass the rectification within the time limit, it will be removed from the list of qualified suppliers and cancel the cooperation qualification. The Company adopts methods of supplier self-inspection and random checks by the Company to evaluate the social responsibility performance of suppliers, and expands the scope and number of audits year by year, with the priority put on auditing suppliers of blades, castings, bearings and other core components, as well as key suppliers with large purchase amounts. Three suppliers were removed from the partnering supplier list because their performance in environmental protection and other aspects did not meet Goldwind's requirements and they failed to rectify the faults afterwards." 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). [2022 Sustainability Report, 2023: goldwind.com]
I.3.M	Prohibition of forced labour: Wage practices	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Employer Pays Principle in policy for own ops and supply chain • Not Met: Describes work with suppliers on paying workers regularly, in full and on time • Not Met: Description of implementation and monitoring of this practice • Not Met: Requirements on paying in full and on time in supplier codes and contracts
I.4.M	Prohibition of forced labour: Restrictions on workers	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Requirements on free movement in supplier codes and contracts and own operations • Not Met: Describes working with suppliers on free movement of workers • Not Met: Description of implementation and monitoring of this practice
I.5.M	Freedom of association and collective bargaining	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment on FoA/CB and requirements in suppliers codes and contracts: Goldwind Australia states that 'The Supplier shall grant its Employees lawful rights to freely associate, to form and join (or not join) trade unions and other organizations in accordance with local laws, and to engage in collective bargaining at their option, without interference, discrimination, retaliation, or harassment.' However, no evidence found the Company itself has a requirement for all suppliers at group level. No evidence is found on measures to prohibit any form of intimidation, harassment, retaliation or violence against workers seeking to exercise the right to form and join a trade union. [Goldwind_Australia_Supplier_Social_Responsibility_Code_of_Conduct: goldwind.com] • Not Met: Describes work with suppliers on FoA/CB • Not Met: Assessment of scope of restriction of FoA/CB in supply chain • Not Met: Global Framework Agreement
I.6.M	Living wage (in supply chains)	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Requirements on living wage in supplier codes and contracts: The 2022 Sustainability Report refers to "wage agreements", but makes no mention of the provision of a living wage: "[t]he Company respects employees' right to establish

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>labor unions on their own initiative and continues to improve the democratic management approach based on labor union consultation. Goldwind Group and its subsidiaries have established labor union committees in accordance with the laws, which perform their duties according to the labor union work system and protect the legitimate rights and interests of employees. The labor union committees negotiate and sign Collective contracts, Wage agreements, Occupational safety and health agreements and Protection of female employees' rights and interests agreements on behalf of employees, with all agreements being valid and legal, thus effectively safeguarding the legitimate rights and interests of both parties in the labor relations." Goldwind Australia states that 'The Supplier shall pay its Employees in accordance with all applicable wage laws and regulations, including those related to minimum wage, overtime payment and statutory benefits. The Supplier shall inform its Employees of the wage structure and payment time, pay its Employees in full and on time and provide a clear and understandable payroll. Wage deduction or compensation shall not be used as a disciplinary measure.' However the Company itself does not have a requirement for all of its suppliers to pay workers a living wage. [2022 Sustainability Report, 2023: goldwind.com] & [Goldwind_Australia_Supplier_Social_Responsibility_Code_of_Conduct: goldwind.com]</p> <ul style="list-style-type: none"> • Not Met: Describes work with suppliers on living wage • Not Met: Description of process to determine living wages with unions

J. Right to a healthy and clean environment

Indicator Code	Indicator name	Score (out of 2)	Explanation
J.1.M	Environmental impact assessment and remediation	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Expectation for business partners to conduct EIA: The Company states that 'it has formulated the ecological protection plan for wind farms, compiled environmental impact assessment reports and soil and water conservation plans during the development stage, and paid attention to protecting the biodiversity of the sites; we have incorporated environmental protection and soil and water conservation measures/facilities into the construction plan during the design stage; in the construction stage, we focus on the implementation of various environmental protection and soil and water conservation measures facilities, strictly implement the principle of simultaneous design, simultaneous construction and simultaneous use of wind farms and environmental protection facilities, and at the same time we carry out flood control and drainage, slope treatment, temporary blocking and vegetation restoration; in the acceptance stage, we ensure that all environmental protection and soil and water conservation measures/facilities are put into use simultaneously with wind farms to meet relevant national environmental policy requirements.' However, no evidence was found of expectations for business partners to conduct EIAs. [2023 Sustainability Report: goldwind.com] • Not Met: Expectation for business partners to publish EIA • Not Met: Expectation for business partners to explain CIA
J.2.M	Life cycle assessment	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Conducts regular public life cycle assessments: The Company states that it 'continues to carry out Life Cycle Assessment (LCA) of wind turbines to analyze their environmental impact factors throughout their life cycle, identify opportunities to improve their environmental performance at different stages, and explore opportunities to reduce carbon emissions and gradually reduce carbon footprints. The Company has continued to carry out the Life Cycle Assessment of 9 types of turbines, of which the assessment on 4 types were carried out in 2023. All 9 types have passed one of the world most well-accepted environmental product declaration mechanism- EPD Italy certification..' [2023 Sustainability Report: goldwind.com] • Not Met: Reports on progress made on action plan

K. Transparency and anti-corruption

Indicator Code	Indicator name	Score (out of 2)	Explanation
K.1.M	Anti-corruption due diligence and reporting	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to prohibiting bribes to public officials: The Company states that 'We have developed documents such as Specifications for Anti-fraud Management, Professional Ethics and Code of Conduct for Goldwind Employees and Sunshine Cooperation Agreement, and established anti-corruption mechanisms regarding supervision, inspection and restriction. These measures are aimed at continuously improving the anti-corruption prevention and control system, fostering a culture that creates enough deterrence so that officials neither dare, nor even think of being corrupt, and thus prevent corruption.' The Company also states

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>that the Code 'requires employees to strictly abide by national laws and regulations, the Code of Business Conduct and the Company's rules and regulations; it explicitly prohibits bribery and money laundering, and proposes fair competition and opposition to monopoly, respect for suppliers and other business partners, lawful and compliant business practices with governments, opposition to discrimination and harassment, the guarantee of information security, as well as respect for and protection of intellectual property rights and social morality; it also requires employees to actively identify and prevent compliance risks, refuse illegal acts, assume responsibility for their own behavioral compliance, and take the initiative to report violations.' However, the Professional Ethics and Code of Conduct is not publicly available, which means it is not possible to independently verify its contents beyond the Company's summary. No further evidence is found. [Integrity and Compliance Operation: goldwind.com]</p> <ul style="list-style-type: none"> • Not Met: Expectation extends to relevant business relationships: Goldwind Australia states that 'The Supplier shall comply with Goldwind Australia's Anti-Bribery & Corruption Policy'. However, no evidence is found for the Company itself has a policy for its suppliers and business relationships on anti-corruption. [Goldwind_Australia_Supplier_Social_Responsibility_Code_of_Conduct: goldwind.com] • Not Met: Reports on any complaints on corruption and bribery
K.2.M	Payments to governments & contract transparency	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Publishing a tax CbCR in line with GRI 207-4, or • Not Met: Disclosure of terms, contracts, agreements for those payments • Not Met: Supports governments to disclose contracts and licenses on renewable energy project in line with EITI • Not Met: Expectation for project developers clients to disclose payments to governments at project level (including on land and natural resources)

L. Diversity, equality and inclusion

Indicator Code	Indicator name	Score (out of 2)	Explanation
L.1.M	Diversity, equality & inclusion training for management and employees	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Provides mandatory and regular training as per ILO No 190: The 2022 Sustainability Report contains references to general training in terms of labour rights but no indication of regular training on the contents of the ILO Convention 190: "In order to ensure the implementation of the system and to enhance employees' awareness of rights protection and legal knowledge, the Company has adopted both online and offline approaches to provide special training on the employee rights protection system for all employees, and played relevant content on the multimedia screens in the elevators and corridors of the Company to strengthen employees' understanding of the system." The Company states that 'Goldwind released its Diversified Employment Policy applicable to all business units of the Company. Goldwind prohibits discrimination based on race, color, religion, creed, gender, national origin, sexual orientation, disability, age, marital, and other any other legally protected status where Goldwind operates.' However, no evidence is found that the Company provides mandatory and regular training, as per ILO Convention 190 to its staff. [2022 Sustainability Report, 2023: goldwind.com] & [Commitment to Human Rights, 08/02/2021: goldwind.com] • Not Met: Requires suppliers to provide training • Not Met: Provides materials and access to resources for trainings • Not Met: The trainings include gender-based violence and the Company's policies and mechanisms for addressing it
L.2.M	Gender balance and sensitivity	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Timebound action plan to integrate gender lens to all relevant documents • Not Met: Demonstrates progress through annual reporting • Not Met: Women and non-binary people make up at least 40% of the Company's executives • Not Met: Women and non-binary people make up at least 40% of the Company's board of directors: The Company reports that the proportion of female managers was 19.89% in 2023. However, this number does not meet the requirement of this indicator [2023 Sustainability Report: goldwind.com]
L.3.M	Gender wage gap reporting	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Has closed gender wage gap or timebound commitment • Not Met: Reports information at company level across multiple pay bands • Not Met: Expects business relationships to do the same

Indicator Code	Indicator name	Score (out of 2)	Explanation
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JT. Just transition

Indicator Code	Indicator name	Score (out of 2)	Explanation
JT.3.M	Fundamentals of creating and providing or supporting access to green and decent jobs for an inclusive and balanced workforce	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Public Commitment to create and provide or support access to green and decent jobs, as part of the low carbon transition. • Not Met: Demonstrates measures taken to create and support access to green and decent jobs for affected stakeholders. • Not Met: Demonstrates measures taken to ensure green and decent jobs promoting equality of opportunity for women and vulnerable groups
JT.4.M	Fundamentals of retaining and re- and/or up-skilling workers for an inclusive and balanced workforce	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Public commitment to re-and/or up-skills workers displaced by the transition to a low carbon economy. • Not Met: Disclosure of its process(es) for identifying skills gaps for workers and affected stakeholders, in the context of the low carbon transition. • Not Met: Demonstrates measures taken to provide re-and/or upskilling, training or education opportunities for relevant stakeholders. • Not Met: Demonstrates measures taken to ensure that the re-and/or upskilling, training or education opportunities promoting equality of opportunity for women and vulnerable groups.
JT.6.M	Fundamentals of advocacy for policies and regulation on green and decent job creation, employee retention, education and reskilling, and social protection supporting a just transition	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> • Not Met: Discloses process(es) for aligning its lobbying activities with policies and regulation supporting the just transition. • Not Met: Discloses where its lobbying activities do not align with policies and regulation that support the just transition. • Not Met: Discloses action plan addressing misalignment of lobbying activities with policies and regulation that support just transition. • Not Met: Demonstrates lobbying for just transition and regulations enabling green and decent jobs, reskilling and/or social protection

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(0).0	Serious risks of supply chain forced labour		<ul style="list-style-type: none"> • Area: Exposure to high risk of forced labour • Story: According to media reports, Goldwind is a company based in Xinjiang and has signed a deal with Xinjiang Production and Construction Corps (XPCC), exposing it to potential risks related to Xinjiang. The XPCC is an organisation that was found to be involved in the rights violations of the Uyghur population in the XUAR. Investigations by UN bodies, academics and journalists have presented evidence on a number of human rights abuses including the use of forced labour in XUAR. In its July 2022 report to the UN General Assembly, the UN Special Rapporteur on Contemporary Forms of Slavery “regards it as reasonable to conclude that forced labour among Uyghur, Kazakh and other ethnic minorities has been occurring in the Xinjiang Uyghur Autonomous Region of China” and finds that some instances of forced labour in the Region “may amount to enslavement as a crime against humanity”. The Special Rapporteur states he “considers that indicators of forced labour pointing to the involuntary nature of work rendered by affected communities have been present in many cases” in the context of “State-mandated systems”. Further analysis by independent UN experts concluded that the violations in the Region “may constitute international crimes, in particular crimes against humanity” and have urged China to address their “repeatedly raised concerns about widespread violations of the rights of Uyghurs and other Muslim minorities in the Xinjiang Uyghur Autonomous Region (XUAR) on the basis of religion or belief and under the pretext of national security and preventing extremism”. <p>[United Nations General Assembly, 19/07/2022, "Contemporary forms of slavery affecting persons belonging to ethnic, religious and linguistic minority</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			communities - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences": documents-dds-ny.un.org] [United Nations Special Procedures, 07/09/2022, "Xinjiang report: China must address grave human rights violations and the world must not turn a blind eye, say UN experts": ohchr.org] [International Service for Human Rights, "Repository of United Nations recommendations on human rights in China": ishr.ch] [Business and Human Rights Resource Centre, 02/08/2021, "China: Significant proportion of global solar panel supply chains to raw materials level, including names of suppliers and locations for all destination markets"]
M(0).1	Publication of independently verified full solar panel supply chains to raw materials level, including names of suppliers and locations for all destination markets	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Public commitment to full solar supply chain transparency: In its 2023 Sustainability Report, Goldwind states that it "follows the procurement principles of 'openness and transparency, fair competition, compliance with laws and regulations, and honesty and trustworthiness', and continuously improves the supply chain management system." However, there is no evidence indicating that the company has adopted a public commitment to a full transparent mapping of its supply chain at the time this research was conducted. [2023 Sustainability Report: goldwind.com] • Not Met: Publication of verified full solar supply chains: Goldwind has a supplier social responsibility evaluation system to evaluate suppliers' compliance with laws, employees' rights and interests, health and safety, environmental protection, and business ethics. Its "audit criteria cover three categories of issues: zero-tolerance issues, priority issues, and common issues. Zero-tolerance issues include forced labor, child labor, inhumane treatment, corruption, and fatal safety accidents, which, if found, will lead to the immediate termination of all cooperation." <p>Additionally, the Company states that it expands the scope and number of supplier social responsibility audits every year. In 2023, the Company engaged an independent third party auditor and completed audits of 226 suppliers, covering 100% of major suppliers of wind turbine components (manufacturing category), of which 212 were rated as Grade A suppliers (accounting for 93.81%), and 14 as Grade B (accounting for 6.19%). Furthermore, Goldwind also provides a breakdown its wind turbine parts suppliers by region in 2023: China (386), other Asian countries (5), Europe (50), North American (7), and South America (70). While the Company provides a regional breakdown of its suppliers, it does not provide further granular details such as name, location, size, etc. [2023 Sustainability Report: goldwind.com]</p>
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"> • Not Met: Steps taken aligned with UNGPs: A Goldwind representative stated to the South China Morning Post in 2020 that the Company has "'manufacturing bases" throughout China, "all of which play an important role in the supply of Goldwind's wind turbine products to the domestic and international markets. [...] Among them, the manufacturing bases for seaborne exports are mainly located in the eastern coastal areas.'" The Company representative is further quoted to state 'As a company registered in Xinjiang, Goldwind keeps a close eye on the legislation and actions related to Chinese companies in the United States. [...] We are monitoring and evaluating the possible impact on our business in the United States. Goldwind's current business in the United States is conducted in a normal and orderly manner.' However, the company's response did not 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. [SCMP, 30/12/2020, "As US moves to renewable energy, wind turbines from Xinjiang may get caught in political tempest": scmp.com] • Not Met: Information relevant to all destination markets

3.b Serious Allegations (10% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(1).0	Serious allegation No 1		<ul style="list-style-type: none"> Area: The right to a safe, clean, healthy and sustainable environment; Land rights Headline: Human Rights concerns regarding rare earth mining in Myanmar Story: In 2022 Global Witness and AP News reported severe environmental destruction by unregulated and illegal rare earths extraction (REE) in northeastern Myanmar bordering China, associated to the supply chain for the development of wind turbines in several companies, including Goldwind. The allegations included severe environmental degradation, as well as unlawful expropriations of land. Reports included that individuals and human rights defenders that spoke out on their concerns being arrested. <p>A follow up investigation of Global Witness found that the impact on workers' health, on the environment and on local communities continue to be devastating. One community member in the town of Chipwe said: "There are no longer fish in the waters. Stepping into the water can cause itching and infections. When the animals drink the water, they die." Across the mining region, workers complain of coughing, numbness, skin conditions and kidney issues, all known health risks from the chemical cocktail used in the mines. Global Witness accessed interviews with the wife and mother of two miners who died shortly after being discharged from work. Both were suffering from severe gastrointestinal issues, including ruptured organs and fluid buildup in the abdomen. Their families were convinced their deaths were caused by chemical exposure, although neither was diagnosed.</p> <p>Global Witness identified Goldwind as being named as client of JL Mag, one of the companies with alleged links to the rights violations in Myanmar through their supplier China Rare Earths Group (REGCC). [Business and Human Rights Resource Centre, 12/12/2022, "Myanmar: Rare earth mining grows in Kachin State along border with China": business-humanrights.org] [Global Witness, 09/08/2022, "Myanmar's poisoned mountains": globalwitness.org]</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"> Not Met: Public response: In 2022 AP News reported they had reached out to Xinjian Goldwind for comment but received no response. [AP News, 09/08/2022, "'The Sacrifice Zone': Myanmar bears cost of green energy": apnews.com] Not Met: Detailed response
M(1).2	The company has investigated and taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> Not Met: Engaged with stakeholders: JL Mag stated in response to Global Witness that it did not source HREE from Myanmar. "It said that it sourced HREE from REGCC subsidiary China Southern Rare Earth Group, a firm named in Global Witness' 2022 investigation into rare earth mining in Myanmar, but that it had requested its supplier "to guarantee that 100% of its heavy rare earth materials come from recycling," and do not involve materials from Myanmar. JL Mag added that it conducts in-depth environmental and social due diligence into all suppliers as outlined in the firm's "Code of conduct for sustainable supplier development." REGCC was contacted by Global Witness and stated that the company 'attaches great importance to ESG and supply chain management' and "insists on law-based operation and social responsibilities." It added that each subsidiary of the group "is an independent legal entity" but that REGCC took Global Witness' findings seriously and would therefore "form a special team to carry out relevant in-depth investigation and research, and strengthen targeted regulatory measures so that the Group's subsidiaries can better operate with standards and efficiency." However, it is unclear if this investigation included engagement with affected stakeholders or their legitimate representatives. Not Met: Identified cause Not Met: Identified and implemented improvements Not Met: Stakeholder input to steps taken
M(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> Not Met: Provided remedy Not Met: Remedy satisfactory to stakeholders

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.