



# Renewable Energy & Human Rights Benchmark 2025 Company Profile

Company name Jinko Solar

Sub-sectorSolar PV ManufacturerOverall score8% weighted average

Section score	Weighting	For section
18%	20%	1. UNGP core indicators
7%	40%	2. Salient human rights risks
0%	10%	3.a Response to risk of exposure 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 <u>here</u>.

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		The individual elements of the assessment are met or not as follows:  Not Met: General HRs commitment: The Company's ESG report states that 'Jinko Solar strictly adheres to laws and regulations such as the Labor Law of the People's Republic of China, the Labor Contract Law of the People's Republic of China, and the Employment Promotion Law of the People's Republic of China, as well as relevant laws and regulations of overseas operation locations, actively responds to international initiatives and standards such as the Universal Declaration of Human Rights, the International Labour Organization Conventions, and the United Nations Guiding Principles on Business and Human Rights. We value and respect the basic rights and interests of all employees and have a "zero tolerance" policy towards any infringement of these rights'. However, these commitments are expected to be placed in a formal policy statement document. [2023 Environmental, Social and Governance (ESG) Report, 45404: <a href="mailto:jinkosolarcdn.shwebspace.com">jinkosolarcdn.shwebspace.com</a> Not Met: Commitment to UNGPs: As indicated above, commitments for this indicator are expected to be placed in policy documents rather than periodic reports.
A.2	Commitment to respect the human rights of workers: ILO Declaration on Fundamental	1	The individual elements of the assessment are met or not as follows:  • Met: Commitment to ILO core principles: Although the Company does not have a formal policy statement of commitment to the ILO declaration, the code of conduct has provisions on all ILO core areas of forced labour, child labour and anti-discrimination. In relation to freedom of association and collective bargaining it states the following: 'The Company shall ensure that their employees, without distinction, have the right of

Indicator Code	Indicator name	Score (out of 2)	Explanation
	Principles and Rights at Work		association, union membership and collective bargaining. No retaliation may arise from the exercise of such right and no remuneration or payment whatsoever may be offered to the employees in order to hinder the exercise of such a right.  Likewise, they shall adopt an open and collaborative attitude towards the activities of workers' union. Where the rights to Freedom of Association are restricted under law, the appropriate channels to ensure a reasonable and independent exercise of such rights must be designed'. [Code of Business Conduct and Ethics, N/A:  iinkosolarcdn.shwebspace.com]  Not Met: Expects business relationships to commit to ILO core principles: The Supply Chain Partner Code of Conduct contains express clauses on forced labour, child labour and anti-discrimination. No details found in relation to Freedom of Association and Collective Bargaining (although it mentions legal rights of Freedom
A.3	Commitment to remedy	0	of Association). [Supply Chain Partner Code of Conduct, 2022: jinkosolar.eu]  The individual elements of the assessment are met or not as follows:  Not Met: Commitment to remedy adverse HRs impacts  Not Met: Expects business relationships to make this commitment: Although the supply chain due diligence policy presents deadlines to 'remedy' breaches in relation to suppliers, no further details found, including a formal expectation for suppliers to commit to remedy adverse impacts caused. [Supply Chain Due Diligence Policy, 2023: jinkosolarcdn.shwebspace.com]  Not Met: Commitment to collaborate with judicial or non-judicial mechanisms  Not Met: Commitment to work with business relationships on remedy
A.4	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows:  • Met: Board level responsibility for HRs: The ESG report states that 'During the reporting period, the Company continued to iterate the ESG management structure of "decision-management-execution" and upgraded the Strategy Committee under the Board of Directors to the Strategy and Sustainable Development Committee, which is the overall gatekeeper of ESG management and reports regularly to the Board of Directors to provide opinions'. ESG topics include human rights. [2023 Environmental, Social and Governance (ESG) Report, 45404:  iinkosolarcdn.shwebspace.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:  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	1	The individual elements of the assessment are met or not as follows:  • Met: Senior responsibility for HRs implementation and decision making: The Company reports that, at management level, 'The ESG Management Committee, comprised of the heads of core associated departments related to ESG work, is responsible for formulating ESG-related policies, strategic plans and objectives, managing ESG-related risks, developing and facilitating the execution of annual ESG work plans, overseeing the ESG progress of each department, and promptly addressing significant challenges encountered in the implementation of ESG work'. ESG includes human rights. [2023 Environmental, Social and Governance (ESG) Report, 45404: iinkosolarcdn.shwebspace.com]  • Met: Describes day-to-day responsibility for implementing HRs commitments: The Company reports that 'Collaborative departments, consisting of the heads of core associated departments and main contact persons related to ESG work, are responsible for decomposing ESG objectives into actionable plans tailored to their respective areas of responsibility. They periodically undertake the identification and assessment of thematic risks and opportunities, instituting corresponding countermeasures. Moreover, they actively participate in a range of ESG training sessions and are responsible for cascading this training down to subordinate departments or disseminating the knowledge through appropriate channels'. ESG includes human rights. [2023 Environmental, Social and Governance (ESG) Report, 45404: jinkosolarcdn.shwebspace.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Not Met: Day-to-day resources and expertise allocation in own operations:     Although there's a comprehensive description of ESG systems, no specific evidence found in relation to how human rights expertise and day-today resources are allocated in the Company's own operations. [2023 Environmental, Social and Governance (ESG) Report, 45404: <a href="mailto:jinkosolarcdn.shwebspace.com">jinkosolarcdn.shwebspace.com</a> 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:  Not Met: Describes process of identifying risks in own operations: The Supply chain due diligence policy states that 'The Company has carried out a risk analysis on the human rights and environment-related risks in its own business area, at the Group Companies and at the Group Companies' suppliers. On the basis of such risk analysis, the Company has identified modern slavery as priority risk. In order to ensure the implementation of, and compliance with, the applicable laws and the Principles, the Company has set up a risk management system under which it conducts regular, at least annual, risk analyses and, to the extent necessary, ad hoc risk analyses in its own business area, at the Group Companies and at the Group Companies' suppliers'. However, no details were found of the specific steps taken to identify which are the potential risks and impacts. [Supply Chain Due Diligence Policy, 2023: jinkosolarcdn.shwebspace.com]  Not Met: Describes process for identifying risks in business relationships: See above. Although the Company indicates that it conducts risk analysis in both own operations and supply chain, no evidence was found on the specific steps followed. [Supply Chain Due Diligence Policy, 2023: jinkosolarcdn.shwebspace.com]  Not Met: Describes risk identification system incl. stakeholder consultation  Not Met: Describes how risk identification system is triggered by new circumstances: As indicated above, 'the Company has set up a risk management system under which it conducts [] to the extent necessary, ad hoc risk analyses in its own business area, at the Group Companies and at the Group Companies'. No further details were found. [Supply Chain Due Diligence Policy, 2023: jinkosolarcdn.shwebspace.com]
B.3	Assessing human rights risks and impacts	0	The individual elements of the assessment are met or not as follows:  Not Met: Describes assessment process and discloses salient HRs risks: The Supply chain due diligence policy states that 'The Company has carried out a risk analysis on the human rights and environment-related risks in its own business area, at the Group Companies and at the Group Companies' suppliers. On the basis of such risk analysis, the Company has identified modern slavery as priority risk. In order to ensure the implementation of, and compliance with, the applicable laws and the Principles, the Company has set up a risk management system under which it conducts regular, at least annual, risk analyses and, to the extent necessary, ad hoc risk analyses in its own business area, at the Group Companies and at the Group Companies' suppliers'. However, no details were found of the specific steps taken to assess saliency/relevancy of risks and impacts, including what factor(s) are taken (social, geographical, economic or other) into account to determine it. [Supply Chain Due Diligence Policy, 2023: <a href="mailto:jinkosolarcdn.shwebspace.com">jinkosolarcdn.shwebspace.com</a> ]  Not Met: Describes how process applies to supply chain: See above. Although the Company indicates that it conducts risk analysis in both own operations and supply chain, no evidence was found on the specific steps followed. [Supply Chain Due Diligence Policy, 2023: <a href="mailto:jinkosolarcdn.shwebspace.com">jinkosolarcdn.shwebspace.com</a> ]  Not Met: Public disclosure of results of HRs risk assessment: The Company reports that 'On the basis of such risk analysis, the Company has identified modern slavery as priority risk'. However, it is not clear whether these are all the risks and impacts that the Company considers salient. [Supply Chain Due Diligence Policy, 2023: <a href="mailto:jinkosolarcdn.shwebspace.com">jinkosolarcdn.shwebspace.com</a> ]  Not Met: Describes how assessment involved affected stakeholders
B.4	Integrating and acting on human rights risks and impact assessments	0	The individual elements of the assessment are met or not as follows:  • Not Met: Describes system to prevent, mitigate and remediate HRs issues: Following risk analysis, the Company states that 'Having considered the priority risks already identified and taking into account other risks regarded by the Company as particularly significant, the Company has established the following risk and breach levels'. These include high level breach, which refers to 'any ILO forced labour indicator', 'any discrimination, harassment, violence (including psychological violence) or any violation or breach of any applicable law and any risk o the afore-mentioned shall be considered a high level breach or risk'. Medium level, which refers to health and safety, and low level, which are those that don't fall in the previous one. For each type of breach the Company the Company's

Indicator Code	Indicator name	Score (out of 2)	Explanation
			handling mechanism establishes a process. However, this process just refers to the supply chain management department establishing a deadline to remedy or reassess the relation with the supplier. No details were found in relation to how it proactively takes action to address different salient risks, as this process seems to focus in breaches detected in the supply chain. [Supply Chain Due Diligence Policy, 2023: jinkosolarcdn.shwebspace.com]  • Not Met: Describes how global system applies to supply chain: See above. The process refers to the supply chain. However, seems to focus in deadlines to apply remedy measures and consequences for not addressing them. [Supply Chain Due Diligence Policy, 2023: jinkosolarcdn.shwebspace.com]  • 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	The individual elements of the assessment are met or not as follows:  Not Met: Describes system for evaluation effectiveness of actions: The Company describes the 'risk and handling mechanism' it seems to focus in determining whether specific actions to remedy breaches have been implemented or otherwise terminate relationship with suppliers or, if low level, decide how to address the matter. However, this indicator looks for a broader perspective, showing how the Company, following proactive actions taken for the different risks and impacts, tracks these actions to determine whether risks and impacts are being addressed. Current evidence seems to focus in a particular situation, which is if the supplier is correcting a specific breach. [Supply Chain Due Diligence Policy, 2023: iinkosolarcdn.shwebspace.com]  Not Met: Example of lessons learned from evaluation effectiveness of actions
B.6	Communicatin g on human rights impacts	0	The individual elements of the assessment are met or not as follows:  Not Met: Provides one example of comms with stakeholders  Not Met: Describes challenges to effective comms and how it is working to address them

#### C. Remedies and grievance mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s)fo r workers	1.5	The individual elements of the assessment are met or not as follows:  • Met: Grievance mechanism accessible to all workers: The ESG report indicates that 'The Company has established a formal employee complaint-handling mechanism and process to categorize and manage employee feedback, with appropriate follow-up plans assigned based on the type and urgency of the issues raised, to ensure timely resolution'. It provides a figure showing different channels (U-Talk with executives platform, phone or email communication, labour union and employee representative meetings, etc) [2022 ESG Report, 2023: jinkosolar.eu]  • Not Met: Grievance mechanism available in appropriate languages and workers made aware  • Met: Describes how workers in supply chain access grievance mechanism: Jinkosolar's Supply Chain Partner Code of Conduct requires its partners to "[e]stablish an effective grievance mechanism, encourage employees to propose suggestions and ideas, and implement a zero-tolerance policy for retaliation in response to employee grievances or suggestions'. In addition, the Company has a specific document on 'complaint procedure for human rights and the environment' where it provides an email address, a telephone number and a postal address. It's devoted to 'prevent and minimize risks to human rights and the environment and to end violations of human rights-related or environment-related obligations in its supply chains'. In future assessments the Company will be expected to demonstrate this applies to all business relationships. [Complaint Procedure for Human Rights And The Environment, N/A: jinkosolar.eu]  • Met: Expects business relationships to convey expectation to their business relationships: The Supply chain partner code states that 'This Partner COC applies to JKS partners throughout the entire supply chain, including but not limited to all raw material suppliers (direct and/or indirect), service providers, distributors, vendors, customers, consultants, independent contractors and other partners'. It also adds th
C.2	Grievance mechanism(s) for external	1	Code of Conduct, 2022: jinkosolar.eu]  The individual elements of the assessment are met or not as follows:  • Met: Grievance mechanism accessible to all external individuals and communities: The Complaint procedure for human rights and the environment

Indicator Code	Indicator name	Score (out of 2)	Explanation
	individuals and communities		establishes three means to report concerns including email and postal address and phone number. It states that 'Any person who learns of risks or violations described above (item 1.) can make a report, regardless of whether that person is itself affected by such risk or violation'. In relation to the information that can be reported, it indicates: 'You can report information on risks to human rights or the environment or violations of human rights-related or environment-related obligations if such risks or violations have arisen as a result of the economic activities of the Company itself, its affiliates or its direct or indirect suppliers of goods or services'. [Complaint Procedure for Human Rights And The Environment, N/A: inkosolarcdn.shwebspace.com]  Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware  Met: Describes how external individuals/communities access grievance mechanism: As indicated above: 'You can report information on risks to human rights or the environment or violations of human rights-related or environment-related obligations if such risks or violations have arisen as a result of the economic activities of the Company itself, its affiliates or its direct or indirect suppliers of goods or services'. [Complaint Procedure for Human Rights And The Environment, N/A: jinkosolarcdn.shwebspace.com]  Not Met: Expects business relationships to convey expectation to their business relationships: As indicated above: 'You can report information on risks to human rights or the environment or violations of human rights-related or environment-related obligations if such risks or violations have arisen as a result of the economic activities of the Company itself, its affiliates or its direct or indirect suppliers of goods or services'. [Complaint Procedure for Human Rights And The Environment, N/A:
C.3	Remedying adverse impacts	0	<ul> <li>jinkosolarcdn.shwebspace.com</li> <li>The individual elements of the assessment are met or not as follows:         <ul> <li>Not Met: Describes approach taken to remedy adverse HRs impacts</li> <li>Not Met: Describes changes to systems, processes and practices to prevent future impacts</li> <li>Not Met: Describes approach to monitoring/implementing agreed remedy</li> </ul> </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.M	Commitment to respect indigenous peoples' rights	0	The individual elements of the assessment are met or not as follows:  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	0.5	The individual elements of the assessment are met or not as follows:  • Met: Describes how local communities identified and engaged in the last two years: The Company reports engagement with communities in the context of constructions, including Community impact assessment, community engagement and community volunteer actions. It states that 'We regard ourselves as part of the community, [] We regularly identify and assess the impact of business operations on the community environment and society through environmental impact assessments for new projects, EHS audits, and social responsibility audits, thereby minimizing any potential negative impacts on local communities. We actively engage in maintaining effective communication and interaction with stakeholders, and identify and collect issues that need urgent attention to the development of surrounding communities on the premise of respecting local cultural practices and customs. [] . The Company has designated Community Relations Managers in overseas production bases to assist in various community development activities'. [2023 Environmental, Social and Governance (ESG) Report, 45404: iinkosolarcdn.shwebspace.com]  • Not Met: Provides two examples of engagement with communities: The ESG report indicates that 'We actively engage in maintaining effective communication and interaction with stakeholders, and identify and collect issues that need urgent attention to the development of surrounding communities on the premise of respecting local cultural practices and customs. We address and respond to legitimate concerns raised by community residents, and establish good communication and connections with the community. The Company has designated Community Relations Managers in overseas production bases to assist in various community development activities'. However, no details were found of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			examples of specific engagements related to human rights issues. [2023 Environmental, Social and Governance (ESG) Report, 45404:  jinkosolarcdn.shwebspace.com]  Not Met: Examples of engagement refer to marginalised groups and provide additional detail  Not Met: The company meets B2.C, B3.D, B4.D and B.5.C
D.3.M	Benefit and ownership sharing policy	0	The individual elements of the assessment are met or not as follows:  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:  Not Met: Actions taken to support access and affordability of renewable energy in the value chain  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

#### 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	The individual elements of the assessment are met or not as follows:  • Not Met: Expectation for clients to have commitment to respect land ownership/natural resources as in VGGT  • Not Met: Steps taken to use leverage to resolve land rights issues
E.2.M	Just and fair physical and economic displacement policy implementatio n including free, prior and informed consent	0	The individual elements of the assessment are met or not as follows:  • Not Met: Expectations for clients to commit to IFC PS 5 for physical and economic displacements  • Not Met: Steps taken to use leverage

# F. Security and conflict-affected areas

<b>Indicator Code</b>	Indicator name	Score (out of 2)	Explanation
F.1.M	Operating in or sourcing from conflict-affected areas	0	The individual elements of the assessment are met or not as follows:  • 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	The individual elements of the assessment are met or not as follows:  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	The individual elements of the assessment are met or not as follows:  • Not Met: Policy statement on OECD Guidance aligned due diligence: The ESG report states that 'Jinko Solar is committed to advancing the responsible mineral management with the goal of "zero conflict mineral sourcing and use". We regularly monitor and actively identify procurement processes associated with conflict minerals, and continuously track the attributes and origins of all mineral materials in supply chain'. It adds that 'Based on the Basic List of Conflict Minerals, Jinko Solar has prioritized tin-plated copper strip suppliers for focused oversight, requiring all tin-plated copper strip suppliers to provide a Conflict-Minerals Free Declaration annually and actively trace the source of materials. Such suppliers are also required to commit that the materials provided to Jinko Solar are not sourced from the Democratic Republic of Congo or surrounding countries or regions. In addition, they are required to ensure there are no violations of labor rights during the mining process, including but not limited to child labor, forced labor, and unsafe working conditions'. However, no policy statement of commitment to follow OECD Guidance was found. [2023 Environmental, Social and Governance (ESG)

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Report, 45404: <a href="mailto:jinkosolarcdn.shwebspace.com">jinkosolarcdn.shwebspace.com</a> ] & [Supply Chain Partner Code of
			Conduct, 2022: jinkosolar.eu]
			Not Met: The policy explicitly covers all minerals
			• Not Met: Policy expectations of business relationships: The supplier code states,
			regarding 'supply chain transparency & responsible procurement': 'Truthfully and
			accurately disclose the manufacturing, production, and sales information of
			suppliers throughout its supply chain, in accordance with the reasonable
			requirement of JKS. Any falsification or fabrication of information is prohibited.
			Promote responsible sourcing in own supply chain, encourage upstream suppliers
			to take the social, environmental & ethical responsibilities; No use or trading of
			"conflict minerals" and provide due diligence measures and results as required by
			JKS'. No evidence of a formal expectation to follow the OECD Guidance. [Supply
			Chain Partner Code of Conduct, 2022: jinkosolar.eu
6.2.14	D 11.1		Not Met: Contractual requirement for smelters/refiners to follow OECD  The individual plants of the appearance of all accessors and the property of the appearance of the property of the property of the appearance of the property of the p
G.2.M	Responsible		The individual elements of the assessment are met or not as follows:  Not Met: Identification and mapping of suppliers: The Company states that 'We
	sourcing of		regularly monitor and actively identify procurement processes associated with
	minerals:		conflict minerals, and continuously track the attributes and origins of all mineral
	mapping and		materials in supply chain. The Company has included requirements related to "no
	disclosing the		use, and no sale of conflict minerals" in the Supply Chain Partner Code of Conduct,
	supply chain		requiring all core suppliers to provide due diligence measures and results'. It adds
			that 'During the reporting period, a total of 6 suppliers were involved in the supply
			of tin-plated copper strips, all of whom have signed the Conflict-Minerals Free
			Declaration, confirming that materials provided to Jinko Solar did not originate
			from the Democratic Republic of Congo or surrounding countries or regions, with
			no involvement of conflict minerals'. However, it is not clear whether it identifies
		0	indirect suppliers or only relies in direct suppliers' conflict free declaration. [2023
			Environmental, Social and Governance (ESG) Report, 45404:
			jinkosolarcdn.shwebspace.com]
			• Not Met: Traceability system for mineral supply chain: As indicated above, 'The
			Company has included requirements related to "no use, and no sale of conflict
			minerals" in the Supply Chain Partner Code of Conduct, requiring all core suppliers
			to provide due diligence measures and results'. However, it is not clear if there are
			more suppliers of minerals beyond those 'core suppliers', and whether it has a
			complete traceability system in place [2023 Environmental, Social and
			Governance (ESG) Report, 45404: jinkosolarcdn.shwebspace.com
			Not Met: Discloses smelters/refiners that are most significant part of supply chain     Not Met: Compliant in high or right activities account high and the compliant in high or right activities.
C 2 M	Danis and Halla		Not Met: Suppliers in higher risk activities, geographies, products  The individual elements of the assessment are met or not as follows:
G.3.M	Responsible		
	sourcing of		Not Met: Identification and prioritising of risks in supply chain: The Company states that it 'has included requirements related to "no use, and no sale of conflict
	minerals:		minerals" in the Supply Chain Partner Code of Conduct, requiring all core suppliers
	risk		to provide due diligence measures and results. Moreover, the Company considers
	identification in		whether conflict minerals are involved as a crucial management item in the access
	mineral supply		of new suppliers and audits of qualified suppliers. Based on the Basic List of Conflict
	chains		Minerals, Jinko Solar has prioritized tin-plated copper strip suppliers for focused
			oversight, requiring all tin-plated copper strip suppliers to provide a Conflict-
			Minerals Free Declaration annually and actively trace the source of materials. Such
			suppliers are also required to commit that the materials provided to Jinko Solar are
		0	not sourced from the Democratic Republic of Congo or surrounding countries or
			regions. In addition, they are required to ensure there are no violations of labor
			rights during the mining process, including but not limited to child labor, forced
			labor, and unsafe working conditions'. However, no detailed description of the
			process used to identify and prioritise risks and impacts in its mineral supply chain
			was found. [2022 ESG Report, 2023: jinkosolar.eu]
			• Not Met: Description of process to identify smelters/refiners and whether they
			carry out DD: See above. It is not clear if the Company actually identifies
			smelters/refines and whether they have carried out due diligence processes in
			accordance with the OECD Guidance.
			Not Met: Disclosure of qualified smelters/refiners     Not Met: Processes source minerals assessed as highest risk
	]		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		The individual elements of the assessment are met or not as follows:
	respect the		Not Met: Zero tolerance of threats/attacks on HRDs
	rights of human	0	Not Met: Expectation on business partners in value chain to make this commitment

Indicator Code	Indicator name	Score (out of 2)	Explanation
	environmental		Not Met: Description of how working with HRDs as part of risk assessment and
	defenders		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	,	The individual elements of the assessment are met or not as follows:
	safety		Met: Discloses quantitative information on H&S in own operations (injury rate or lost days and fatalities) in last reporting period: The Company reports on both injury rates (0,39 per million working hours) and fatalities (there were no work-related fatalities). [2022 Environmental Social and Covernance (ESC) Papert
			related fatalities). [2023 Environmental, Social and Governance (ESG) Report, 45404: <a href="mailto:jinkosolarcdn.shwebspace.com">jinkosolarcdn.shwebspace.com</a>
			Not Met: Expects disclosure of H&S information of relevant business
			relationships: The Company's Supply Chain Partner Code of Conduct states that it expects its suppliers to "[s]trictly adhere to laws and regulations on safety and
			occupational health, establish a comprehensive management system to ensure a
			safe and healthy working environment for employees'. No further evidence was found. [Supply Chain Partner Code of Conduct, 2022: <a href="mailto:jinkosolar.eu">jinkosolar.eu</a> ]
			Met: Targets for H&S performance (including injury rates or lost days and fatalities): The Company has disclosed goals on different health and safety.
			fatalities): The Company has disclosed goals on different health and safety indicators including injury rate. On this matter, goal was 0,85 per million working
		1.5	hours and it achieved 0,39. During the report, there were no work-related fatalities.  [2023 Environmental, Social and Governance (ESG) Report, 45404:
			jinkosolarcdn.shwebspace.com]
			Met: The Company describes the process(es) it has in place to identify its health     and a few cities and inspect to Process(es).
			and safety risks and impacts: Regarding production the company indicates that 'conducts EHS audits quarterly, covering all production bases, to identify and assess
			the risks in production processes and facilities, construction safety, production
			environment, and occupational health and safety accidents. During the reporting
			period, the Company circularly conducted 98 internal safety audits and carried out
			comprehensive rectification after the completion of the audits'. In relation to
			'mechanism for safety risk investigation and management' it also refers to 'expert support': 'Engage external technical experts to conduct comprehensive risk
			identification and analysis for various
			processes, summarize and diagnose the identified hazards, and then develop
			focused improvement measures'.
I.2.M	Forced labour		The individual elements of the assessment are met or not as follows:
	risk		<ul> <li>Not Met: Board level oversight over policies on forced labour in supply chain.</li> <li>How relevant stakeholders informed board discussions</li> </ul>
	management		Not Met: Capacity building with suppliers
			Not Met: Discloses ongoing efforts to prevent and mitigate forced labour in own
			ops and supply chain: The Company's supply chain due diligence policy document
			describes its risk management system in relation to forced labour. However, no
			specific proactive measure was found to prevent and mitigate forced labour using
			its leverage (i.e. capacity building, collaboration, etc.) [Supply Chain Due Diligence Policy, 2023: jinkosolarcdn.shwebspace.com] & [2023 Environmental, Social and
			Governance (ESG) Report, 45404: jinkosolarcdn.shwebspace.com
		0	Not Met: Factors to be considered when ending a business relationship incl.
			responsible disengagement: The Company states that, in relation to breaches
			related to forced labour 'breach is classified as high level', 'The Company, at the
			expiry of such deadline, shall inspect whether the provided instructions were implemented to its satisfaction. In case of failure to remedy within such deadline,
			the business relationship with the relevant supplier shall be terminated by the
			relevant Group Company'. 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). [Supply Chain Due Diligence Policy, 2023:
			jinkosolarcdn.shwebspace.com]
I.3.M	Prohibition of		The individual elements of the assessment are met or not as follows:
	forced labour:		Not Met: Employer Pays Principle in policy for own ops and supply chain: The  Code of conduct states that the Company of all not require yearless to real
	Wage practices		Code of conduct states that 'the Company shall not require workers to pay recruitment fees or other related fees for their employment, to anyone. If any such
		0	fees are found to have been paid by workers, such fees shall be repaid over to the
			worker'. Regarding suppliers, the supplier code states: 'There shall be no
			incurrence of fees or charges during the recruitment process'. No evidence found
			of reimbursement requirement for suppliers. [Code of Business Conduct and Ethics,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			N/A: <u>jinkosolarcdn.shwebspace.com</u> ] & [Supply Chain Partner Code of Conduct,
			2022: jinkosolar.eu]
			• 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		The individual elements of the assessment are met or not as follows:
	forced labour:		• Met: Requirements on free movement in supplier codes and contracts and own
	Restrictions on		operations: The Code of conduct states that 'The Company shall not allow any form
	workers		of forced or involuntary labor in their workplace. They may not require their
	Workers		employees to make any kind of "deposits", nor are they entitled to retain
			employees' identity documents. The Company shall acknowledge the right of their
			employees to leave their employer after reasonable notice'. The supplier codes
		0.6667	includes the following requirement: 'Each employee shall be ensured with the right
			to freedom of movement. There shall be no incurrence of fees or charges during
			the recruitment process. Employees shall be able to keep or access their
			identification and traveling documents at any time'. [Code of Business Conduct and
			Ethics, N/A: <u>jinkosolarcdn.shwebspace.com</u> ] & [Supply Chain Partner Code of
			Conduct, 2022: jinkosolar.eu]
			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		The individual elements of the assessment are met or not as follows:
	association and		Not Met: Commitment on FoA/CB and requirements in suppliers codes and
	collective		contracts: No evidence was found of requirements regarding collective bargaining
	bargaining	0	for suppliers, including measures in place to prevent it in both own operations and
		· ·	supply chain. [Supply Chain Partner Code of Conduct, 2022: <u>jinkosolar.eu</u> ]
			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		The individual elements of the assessment are met or not as follows:
	supply chains)		Not Met: Requirements on living wage in supplier codes and contracts
		0	Not Met: Describes work with suppliers on living wage
			• Not Met: Description of process to determine living wages with unions: The code
			refers to minimum wage. No reference was found to living wages. [Code of
			Business Conduct and Ethics, N/A: <u>jinkosolarcdn.shwebspace.com</u> ]

## 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	The individual elements of the assessment are met or not as follows:  • Not Met: Expectation for business partners to conduct EIA: The Company states that 'During the reporting period, the Company systematically promoted the identification and evaluation of environmental impact factors of projects, completed the environmental impact evaluation of 100% of all newly built projects and obtained the EIA approval, and there were no incidents of any newly constructed, renovated and expanded projects having significant impact on the environment'. it is not clear, however, if it requires its business partners (project developers) to undertake environmental impact assessments. [2023 Environmental, Social and Governance (ESG) Report, 45404: <a href="mailto:jinkosolarcdn.shwebspace.com">jinkosolarcdn.shwebspace.com</a> ]  • 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	The individual elements of the assessment are met or not as follows:  • Met: Conducts regular public life cycle assessments: JinkoSolar announced on its website that "it has obtained the first photovoltaic module LCA (Life Cycle Assessment) certificate in the Greater China region issued by TÜV Rheinland (China) Ltd. ("TÜV Rheinland"), and concurrently passed the Italian EPD certification. The modules that have been certified are monocrystalline mainstream modules, with a total of 6 series and 43 sub-models. It is currently the sole domestic project with the largest number of products that have passed the Italian EPD photovoltaic certification at the same time. The LCA certificate issued by TÜV Rheinland is an important foundation for the Italian EPD certification. Based on the requirements of ISO 14040/ISO 14044, it adopts a life cycle assessment method focusing on environmental impact such as global warming potential, from raw material mining to the production of silicon wafers, cells, modules, upstream and downstream transportation, power station construction, operation and maintenance to final dismantling and disposal, and comprehensively evaluates and demonstrates multiple environmental impacts of JinkoSolar's photovoltaic products

<b>Indicator Code</b>	Indicator name	Score (out of 2)	Explanation
			throughout their life cycle index'. The ESG report states that 'As of the end of the
			reporting period, 15 products have carried out product Life Cycle Assessment (LCA);
			9 products have passed the Italian Environmental Product Declaration Certification,
			of which 4 products have passed the certification during the reporting period'.
			[First LCA Certificate for PV Modules issued by TÜV Rheinland China, 08/09/2021:
			ir.jinkosolar.com] & [2023 Environmental, Social and Governance (ESG) Report,
			45404: jinkosolarcdn.shwebspace.com]
			Not Met: Reports on progress made on action plan

#### K. Transparency and anti-corruption

<b>Indicator Code</b>	Indicator name	Score (out of 2)	Explanation
K.1.M	Anti-corruption due diligence and reporting	0	The individual elements of the assessment are met or not as follows:  Not Met: Commitment to prohibiting bribes to public officials: The Company's Code of Business Conduct and Ethics states that 'The U.S. Foreign Corrupt Practices Act (the "FCPA") prohibits the Company and its employees and agents from offering or giving money or any other item of value to win or retain business or to influence any act or decision of any governmental official, officer or employee of a government-owned or -controlled business or company, political party, candidate for political office or official of a public international organization. [] Violation of the FCPA is a crime that can result in severe fines and criminal penalties, as well as disciplinary action by the Company, up to and including termination of employment'. It also states that 'no employee may give or receive kickbacks, bribe others, or secretly give or receive commissions or any other personal benefits' and that 'This prohibition also extends to payments to a sales representative or agent if there is reason to believe that the payment will be used indirectly for a prohibited payment to government officials'. No evidence was found on whether this commitment is extensive to associates or relatives of public officials or employees of business relationships. [Business Code of Conduct and Ethics, N/A: jinkosolar.eu]  Not Met: Expectation extends to relevant business relationships: The Company's Supply Chain Partner Code of Conduct contains a general reference to corruption and bribery: 'Anti-Bribery and Anti-Corruption: All forms of bribery, corruption, extortion, and unfair or illegal business practices shall be prohibited.' However, no specific expectation on public officials was found. [Supply Chain Partner Code of Conduct, 2022: jinkosolar.eu]
K.2.M	Payments to governments & contract transparency	0	The individual elements of the assessment are met or not as follows:  Not Met: Publishing a tax CbCR in line with GRI 207-4, or: Not met. But please note that JinkoSolar discloses the purchase of land rights in its Annual Reports. See for example its 2022 Annual Report where it discloses land use rights representing fees paid to the government to obtain the rights to use certain lands over periods of 50 to 70 years. In future assessments, the Company will be expected to demonstrate it publishes a tax CbCR and expects project developers clients to report on its payments to governments at project level, including for purchase or rent of land or natural resources related to their renewable energy projects. No further details found, including taxes paid by country. [Form 20-F, 2023: ir.jinkosolar.com] & [Form 20-F, 2023: ir.jinkosolar.com]  Not Met: Disclosure of terms, contracts, agreements for those payments  Not Met: Supports governments to disclose contracts and licenses on renewable energy project in line with EITI  Not Met: 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	The individual elements of the assessment are met or not as follows:  • Not Met: Provides mandatory and regular training as per ILO No 190: The Company states that 'Each year, Jinko Solar regularly conducts training on diversity and policies related to rights and interests. The Company takes the management and personnel in key positions as the link to ensure that all employees learn and master employment compliance knowledge. During the reporting period, focusing on the theme of "labor's rights and interests", the Company conducted four specialized training sessions on employment compliance for management and personnel in key positions, providing in-depth interpretations of key employment compliance issues such as [] diversity and inclusive equality, health and [] anti-discrimination, anti-harassment and anti-abuse, female care []. However, it does not seem to cover its workers generally on all types of contracts, since it specifies that were conducted for 'management and personnel in key positions'. [2023

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Environmental, Social and Governance (ESG) Report, 45404:  jinkosolarcdn.shwebspace.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	The individual elements of the assessment are met or not as follows:  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: There is one woman on the board, accounting for approximately 14% of the board.  Not Met: Women and non-binary people make up at least 40% of the Company's board of directors
L.3.M	Gender wage gap reporting	0	The individual elements of the assessment are met or not as follows:  Not Met: Has closed gender wage gap or timebound commitment  Not Met: Reports information at company level across multiple pay bands  Not Met: Expects business relationships to do the same

#### JT. Just transition

<b>Indicator Code</b>	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:  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:  Not Met: Public commitment to re-and/or up-skills workers displaced by the transition to a low carbon economy.: The Company reports on its 'employee training system', however, no specific reference was found in relation to the topic of this indicator. [2023 Environmental, Social and Governance (ESG) Report, 45404: <a href="mailto:imkosolarcdn.shwebspace.com">imkosolarcdn.shwebspace.com</a> 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:  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		Area: Exposure to high risk of forced labour
	supply chain		
	supply chain forced labour		• Story: According to recent data, approximately 35% of the world's polysilicon, and 32% of global metallurgical grade polysilicon, the material from which polysilicon is made, is produced in Xinjiang Uyghur Autonomous Region (XUAR). Investigations by UN bodies, academics and journalists have presented evidence on a number of human rights abuses including the use of forced labour in XUAR. In its July 2022 report to the UN General Assembly, the UN Special Rapporteur on Contemporary Forms of Slavery "regards it as reasonable to conclude that forced labour among Uyghur, Kazakh and other ethnic minorities has been occurring in the Xinjiang Uyghur Autonomous Region of China" and finds that some instances of forced labour in the Region "may amount to enslavement as a crime against humanity". The Special Rapporteur states he "considers that indicators of forced labour pointing to the involuntary nature of work rendered by affected communities have been present in many cases" in the context of "State-mandated systems". Further analysis by independent UN experts concluded that the violations in the Region "may constitute international crimes, in particular crimes against humanity" and have urged China to address their "repeatedly raised concerns about widespread violations of the rights of Uyghurs and other Muslim minorities in the Xinjiang Uyghur Autonomous Region (XUAR) on the basis of religion or belief and under the pretext of national security and preventing extremism".  [United Nations General Assembly, 19/07/2022, "Contemporary forms of slavery affecting persons belonging to ethnic, religious and linguistic minority communities - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences": documents-dds-ny.un.org] [United Nations Special Procedures, 07/09/2022, "Xinjiang report: China must address grave human rights violations and the world must not turn a blind eye, say UN
M(0).1	Publication of independently verified full solar panel supply chains to raw materials level, including names of suppliers and locations for all		Nations Special Procedures, 07/09/2022, "Xinjiang report: China must address
	destination markets	0	Additionally, in its 2023 ESG Report, the Company shared that it "also actively promotes local procurement of raw materials. When conditions permit, priority is given to cooperating with suppliers in the regions where production bases are located in or nearby At the same time, local procurement helps track the attributes and origins of all mineral materials in the supply chain. As of the end of the reporting period, the proportion of local procurement has reached 76.53%." 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 Environmental, Social and Governance (ESG) Report, 45404: <a href="mailto:jinkosolarcdn.shwebspace.com">jinkosolarcdn.shwebspace.com</a> ]  • Not Met: Publication of verified full solar supply chains: In its 2023 ESG Report, JinkoSolar shared that it has a total of 1,728 (76.53%) domestic suppliers and 530 (23.46%) overseas suppliers. However, the Company does not provide further details on these suppliers such as name, location, size, etc. [2023 Environmental, Social and Governance (ESG) Report, 45404: <a href="mailto:jinkosolarcdn.shwebspace.com">jinkosolarcdn.shwebspace.com</a> ]

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(0).2	The company explains steps taken and how these align with steps expected by the UN Guiding Principles (including reference to assessment of severity of risks, leverage, and crucial nature of business relationships)	0	The individual elements of the assessment are met or not as follows:  Not Met: Steps taken aligned with UNGPs: In its response to the Sheffield Halam University in August 2023, the Company indicated that "on May 24, JinkoSolar announced the sale of its 100% equity interest in the Xinjiang ingot operation. The capacity of the Xinjiang ingot entity was small, and JinkoSolar has multiple ingot manufacturing facilities inside and outside China that will suffice for the company's global needs in 2023 and beyond. By the end of 2023, JinkoSolar anticipates having 75GW of ingot and wafer capacity, matching the 75GW of global solar cell production." Additionally, in its 2023 Annual Report, the company states that it does "not tolerate any use of forced labor, whether in [its] own manufacturing facilities or, to the best of [its] knowledge, throughout our supply chain. [It] monitor[s] [its] manufacturing facilities to ensure no forced labor is used Given the fact that [it] had a manufacturing facility in Xinjiang in the past, [it] cannot assure you that the relevant U.S. authorities will not decide that forced labor exists in the manufacturing of [its] products or in [its] supply chain and, put [its] facilities or their affiliate companies on the list of entities to be issued pursuant to UFLPA." Direct sales to the US accounted for 4.5% and 8.8% of JinkoSolar's total revenues in 2022 and 2023. Furthermore, the company also highlights in the same report that "there is a growing concern regarding the alleged used of forced labor issue in the XUAR in the European Union, Canada, Australia, Japan and certain other countries If any new legislation or regulatory action with respect to these issues were to be enacted in those regions that impose additional restrictions or requirements on importation of goods that are produced or manufactured, wholly or in part, in the XUAR, our business and operation in these regions would be adversely affected."  No information was found that meets the criteria on explaining steps expecte

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(1).0	Serious allegation No 1		Area: Land Rights; Right to safe, clean, healthy and sustainable environment
			Headline: Civil society report examines rights violations by Chinese business activities in Latin America
			• Story: As part of the 49th session of the UN Human Rights Council, more than 60 civil society organizations released a new report that evaluates 26 projects backed by Chinese companies and capital across nine Latin American countries. The investigation found a pattern of failure to comply with international standards on human rights and the environment by the Chinese government.
			The report, Human Rights and Chinese Business Activities in Latin America, evaluates compliance with the recommendations adopted by China in its latest Universal Periodic Review (UPR) in 2018, based on the examination on violations of human rights and the rights of nature in 26 projects. The report implicated 23 consortiums and at least six banks that are involved in developing projects in the mining (12), hydroelectric (6), oil and gas (3), and other (5) sectors. The case studies serve as an external mechanism to point out that China has failed to implement its commitments.
			The Chinese government has participated in three cycles of the Universal Periodic Review (2009, 2013, and 2018), and in the last one, the Collective on Chinese Financing and Investments, Human Rights and the Environment (CICDHA), which includes Amazon Watch as a member, prepared eight "shadow reports" on its extraterritorial responsibility regarding the activities of Chinese companies and banks in Latin America.
			Among the cases presented is the Yucatan Solar Project in Mexico. Which is part of a package of 35 renewable energy projects in the Yucatan peninsula. It consists of a photovoltaic solar park on 246.8 hectares of jungle, classified as private property in the municipality of Valladolid109. It is the only alternative energy project in which indigenous peoples and human rights defenders have received death threats and harassment.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			[Amazon Watch, 23/03/2022, "Human Rights and Chinese Business Activities in Latin America": <a href="mailto:amazonwatch.org">amazonwatch.org</a> ]
M(1).1	The company has responded publicly to the allegation	0	The individual elements of the assessment are met or not as follows:  • Not Met: Public response: No response to Yucatan Solar project CRM.  • Not Met: Detailed response
M(1).2	The company has investigated and taken appropriate action	0	The individual elements of the assessment are met or not as follows:  Not Met: Engaged with stakeholders  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	The individual elements of the assessment are met or not as follows:  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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<sup>\*</sup> 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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