



## Renewable Energy & Human Rights Benchmark 2025 Company Profile

**Company name** Suzlon  
**Sub-sector** Wind turbine manufacturer  
**Overall score** 12% weighted average

Section score	Weighting	For section
25%	20%	1. UNGP core indicators
5%	40%	2. Salient human rights risks
N/A	10%	3.a Response to risk of exposure to forced labour
N/A	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	2	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"><li>• Met: General HRs commitment: The Human rights policy states that the Company 'is committed to protecting and promoting human rights in all aspects of its operations' [Human Rights policy, 22/07/2024: <a href="https://www.suzlon.com">suzlon.com</a>]</li><li>• Met: Commitment to UNGPs: It adds that 'This policy is in alignment with applicable international and national standards and frameworks, such as United Nations Guiding Principles on Business and Human Rights' [Human Rights policy, 22/07/2024: <a href="https://www.suzlon.com">suzlon.com</a>]</li></ul>
A.2	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	2	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"><li>• Met: Commitment to ILO core principles: The Human rights policy states that 'The Company upholds the rights of all workers, including the right to fair wages, safe working conditions, and freedom from exploitation. All workers have the rights of collective bargaining as a fundamental rights. The Company extends all labour-related policies to third-party workers and contractors to ensure fair treatment and promote a culture of respect and fairness'. it also indicates that 'the Company recognizes the right of individuals to form and join associations and trade unions'. Finally, it also points out that 'the company does not discriminate against anyone on the basis of [...]'. [Human Rights policy, 22/07/2024: <a href="https://www.suzlon.com">suzlon.com</a>]</li><li>• Met: Expects business relationships to commit to ILO core principles: The Supplier code states that 'The suppliers must determine respect for employees rights to organize and bargain collectively'; 'all suppliers should ensure non-hiring of child labour under any circumstances'; 'Suppliers must not engage in or tolerate any form of modern slavery including forced labor, bonded labour, or human</li></ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			trafficking'. 'We expect all suppliers and business partners to respect their people and to treat all people equally, with respect and dignity, ensure non-discrimination discrimination on the grounds of age, colour, disability, ethnicity, gender, and religion'. [Supplier code of conduct, 22/07/2024: <a href="https://www.suzlon.com">suzlon.com</a> ]
A.3	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Not Met: Commitment to remedy adverse HRs impacts</li> <li>• Not Met: Expects business relationships to make this commitment: The Company indicates it requires suppliers to provide remediation in cases of child labour. However, no evidence of a general expectation for business relationships to commit to remediation in cases of adverse human rights impacts was found. [Supplier code of conduct, 22/07/2024: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Commitment to collaborate with judicial or non-judicial mechanisms</li> <li>• Not Met: Commitment to work with business relationships on remedy</li> </ul>
A.4	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Met: Board level responsibility for HRs: The Company indicates that 'The CSR &amp; ESG Board Committee, comprising two Non-Executive Independent Directors and two Executive Directors, oversees strategic directions, recognizing the issues, forces, and risks that define our long-term sustainability performance. The committee chairperson updates the Board at each meeting, where members actively discuss various ESG initiatives and progress against commitments'. Both CSR and Sustainability policies include human rights. [Sustainability report 2023 - 2024, N/A: <a href="https://www.suzlon.com">suzlon.com</a>] &amp; [CSR policy, 12/11/2021: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Describes HRs expertise of Board member</li> <li>• Not Met: Board member/CEO signal importance of HRs in their communications</li> <li>• Not Met: CEO or board incentives</li> </ul>
A.5	Responsible lobbying and political engagement fundamentals	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Not Met: Publicly available policy statement(s) (or policy(ies)) setting out lobbying and political engagement approach.</li> <li>• Not Met: Monetary value of direct political contributions</li> <li>• Not Met: Monetary value of indirect political contributions</li> <li>• Not Met: Requirement for third-party lobbyists to comply with the Company's lobbying and political engagement policy (or policies)</li> </ul>

## B. Embedding respect and human rights due diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1	Responsibility and resources for day-to-day human rights functions	1	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Met: Senior responsibility for HRs implementation and decision making: The Company indicates that 'The Corporate Sustainability &amp; ESG Head drives sustainability across the company through the creation and implementation of policies, systems, internal controls, and mechanisms that align with the strategic vision. This role oversees the development and implementation of the sustainability strategy, commitments, and roadmap, coordinating with CEOs of business verticals to achieve these goals'. It also states that ', respect for human rights is a fundamental aspect of our commitment to ethical business practices and corporate responsibility'. [Sustainability report 2023 - 2024, N/A: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Met: Describes day-to-day responsibility for implementing HRs commitments: The report continues: 'The Head bridges the gap between top-level leadership and implementation teams across various business units, providing strategic guidance to the Corporate Sustainability &amp; ESG team. This team supports the execution of the ESG strategy and coordinates with sustainability champions and functional heads to ensure effective and consistent implementation of sustainability initiatives. They collect and analyze data, prepare reports, and communicate progress to stakeholders'. [Sustainability report 2023 - 2024, N/A: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Day-to-day resources and expertise allocation in own operations: Although the Human rights policy states that the Company 'will appoint an ambassador to drive this policy across the organization and ensure that any complaints/feedback are acted on suitable', no further details were found. No details found of the specific expertise existing within the teams mentioned in previous datapoints. [Human Rights policy, 22/07/2024: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Resources and expertise allocation in supply chain</li> </ul>
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"> <li>• Not Met: Describes process of identifying risks in own operations: Although the Company indicates that 'due diligence/Audit to identify and assess human rights related risks are conducted', and indicates that it undertakes due diligence on a number of matters in its human rights policy, no details were found in relation to the actual processes followed to identify which are the potential human rights risks and impacts is the Company facing in its own operations. [Sustainability</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>report 2023 - 2024, N/A: <a href="https://suzlon.com">suzlon.com</a>] &amp; [Human Rights policy, 22/07/2024: <a href="https://suzlon.com">suzlon.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Describes process for identifying risks in business relationships: The Company indicates that 'Our supply chain Due Diligence procedures are in place for onboarding and annual monitoring'. The supplier code also refers to due diligence and human rights. However, no details were found in relation to the actual processes followed to identify which are the potential human rights risks and impacts is the Company facing through its business relationships (beyond individual supplier risks and impacts, it is expected that the Company provides a panoramic vision of what are the issues it may face in its business relationships). [Sustainability report 2023 - 2024, N/A: <a href="https://suzlon.com">suzlon.com</a>] &amp; [Supplier code of conduct, 22/07/2024: <a href="https://suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Describes risk identification system incl. stakeholder consultation</li> <li>• Not Met: Describes how risk identification system is triggered by new circumstances</li> </ul>
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"> <li>• Not Met: Describes assessment process and discloses salient HRs risks: The Company states that 'In FY 23-24, 69.5% of our plants and offices were assessed for human rights violations, including child labour, forced labour, discrimination at workplace, sexual harassment, collective bargaining etc'. However, no details were found in relation to the process followed, including factors taken into account to determine saliency (i.e. social, geographical, economic or other factors). [Sustainability report 2023 - 2024, N/A: <a href="https://suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Describes how process applies to supply chain: The Company indicates that 'Suppliers are onboarded based on quality, cost-effectiveness, timeliness, and ESG considerations. We also ensure they respect human rights, including no child labor and fair wages. Regular supplier audits and vendor meetings address concerns and share learnings. Our Supply Chain Due Diligence procedures are in place for onboarding and annual monitoring. We plan to develop a comprehensive supply chain management framework to identify improvement areas, mitigate risks, and leverage opportunities'. However, no details were found in relation to the specific steps it follows to assess which are the concrete topics that it considers to be salient through its supply chain, including how social, geographical, economic or other factors are taken into account. [Sustainability report 2023 - 2024, N/A: <a href="https://suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Public disclosure of results of HRs risk assessment: The Company indicates that 'Supply chains can expose us to hidden and uncontrollable ESG risks such as depletion of natural resources, human rights abuses, workforce health and safety incidents'. It also states that impacts identified include 'human rights violations across the supply chain and during sourcing'. However, no details found on the actual human rights issues considered to be salient following due diligence identification &amp; assessment process. Only health and safety is mentioned as specific issue. Also, despite the Company indicates that it assessed its plants and offices, it is not clear what was the outcome. [Sustainability report 2023 - 2024, N/A: <a href="https://suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Describes how assessment involved affected stakeholders</li> </ul>
B.4	Integrating and acting on human rights risks and impact assessments	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Describes system to prevent, mitigate and remediate HRs issues</li> <li>• Not Met: Describes how global system applies to supply chain: The Company indicates that 'We carry our supplier audits and vendor meets at regular intervals to highlight concerns and exchange learnings. The Supply Chain Due Diligence procedures and assessment of suppliers during onboarding and monitoring on annual basis is already under implementation'. Further, we are planning to develop a comprehensive supply chain management framework that will serve as a tool to help us identify key areas for improvement and therefore mitigate risks and leverage the opportunities associated with robust supply chain management'. As per the quoted evidence, current disclosure seems to focus in a compliance monitoring process. This subindicator looks for a general process to prevent, mitigate and remediate human rights issues in a consolidated manner, even if the compliance program is part of it.</li> <li>• Not Met: Example of actions decided on at least 1 salient HRs issue</li> <li>• Not Met: Describes how stakeholders involved in decisions about actions taken</li> </ul>
B.5	Tracking the effectiveness of actions to respond to human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Describes system for evaluation effectiveness of actions</li> <li>• Not Met: Example of lessons learned from evaluation effectiveness of actions</li> <li>• Not Met: Involves stakeholders in evaluation effectiveness of actions</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	risks and impacts		
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"> <li>• Not Met: Provides one example of comms with stakeholders</li> <li>• Not Met: Describes challenges to effective comms and how it is working to address them</li> </ul>

### C. Remedies and grievance mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism accessible to all workers: The Sustainability report indicates that 'Employees have the option to report issues via the Whistle-blower mechanism, POSH or ethics helpline. Additionally, concerns about unsafe working conditions can be directed to the Safety Committee'. [Sustainability report 2023 - 2024, N/A: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Grievance mechanism available in appropriate languages and workers made aware: The whistle-blower policy states that 'Protected Disclosures should preferably be reported in writing so as to ensure a clear understanding of the issues raised and should either be typed or written in a legible handwriting in English, Hindi or in the regional language of the place of employment / engagement of the Whistle-blower'. However, no evidence found of awareness campaigns or training in a way that all employees are aware of the mechanism. [Whistleblower policy /Vigil Mechanism: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Met: Describes how workers in supply chain access grievance mechanism: The Sustainable sourcing policy states that 'The Company expects the suppliers to report in good faith any potential or actual violation of the Suppliers Code of Conduct, laws, regulations or ethical or professional standards. Unless prohibited by Applicable Laws, the Company expects the suppliers to raise concerns related to the Suppliers Code of Conduct by making a protected and confidential disclosure through the reporting channels mentioned in the Company's Whistle Blower Policy'. In future assessments the Company will be expected to demonstrate this applies to all business relationships. [Sustainable sourcing policy: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Expects business relationships to convey expectation to their business relationships: The sustainable sourcing policy states that it applies to the Company's 'immediate business partners'. No evidence found that suppliers are expected to cascade down this requirements down their supply chains. [Sustainable sourcing policy: <a href="https://www.suzlon.com">suzlon.com</a>]</li> </ul>
C.2	Grievance mechanism(s) for external individuals and communities	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism accessible to all external individuals and communities: The Whistleblower policy states that 'all employees, directors and stakeholders of the Company or its subsidiary are eligible to make Protected Disclosures under the Policy'. The policy clarifies that stakeholders 'means and includes vendors, suppliers, lenders, customers, subcontractors, consultants, shareholders, business associates etc'. In addition, the annual report describes 'community grievance redressal mechanism': 'Suzlon follows a detailed grievance redressal mechanism that tackles three major categories of grievances originating from: (1) the community (2) media (3) persons of power. For the first category of grievances, the sources can be further sub-divided into: (a) genuine community grievances (b) community expectations, and, (c) threats from antisocials. Regional level CSR managers are the principal troubleshooters and negotiators for such incidents, mediating between internal decisionmakers and external stakeholders to resolve issues, in conformance with human rights principles [...] This grievance redressal mechanism was instituted from the FY18. Tracking and redressing community grievances has helped Suzlon identify and address systemic issues, thereby improving stakeholder relations and organisational accountability'. [Whistleblower policy /Vigil Mechanism: <a href="https://www.suzlon.com">suzlon.com</a>] &amp; [Annual report 2023-24, 03/2024: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: Although language availability can be assumed in community grievance (regional level CSR managers are in charge) and the whistleblower policy allows for language of the place of employment, it is not clear how external affected stakeholders are made aware of the mechanisms. [Whistleblower policy /Vigil Mechanism: <a href="https://www.suzlon.com">suzlon.com</a>] &amp; [Annual report 2023-24, 03/2024: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Describes how external individuals/communities access grievance mechanism</li> <li>• Not Met: Expects business relationships to convey expectation to their business relationships</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.3	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Describes approach taken to remedy adverse HRs impacts: Although the Company reports in relation to the number of complaints by employees (69) and communities (25), no details found on description of actual human rights impact(s) caused and remedy(ies) provided. [Sustainability report 2023 - 2024, N/A: <a href="https://www.suzlon.com">suzlon.com</a>]</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>

## 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	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Expectation of project developer clients to have a public commitment to respect indigenous rights: The Company's responsible business conduct policy includes a commitment to 'respect the rights of indigenous people and their communities, including their right to land, resources, and self-determination'. Similar commitments appear in the Human rights policy. No evidence was found, however, of a similar expectation in its value chain, including project developer clients. [Responsible business conduct policy, 22/07/2024: <a href="https://www.suzlon.com">suzlon.com</a>] &amp; [Human Rights policy, 22/07/2024: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Commitment to only work with business partners that respect FPIC</li> </ul>
D.2.M	Engagement with all affected communities	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Describes how local communities identified and engaged in the last two years: The annual report indicates that 'the village communities that adjoin Suzlon's sites lie at the core of the Company's CSR focus. Over the 25-year lifecycle of Suzlon's turbines, Suzlon CSR works with these communities following the Engage-Empower-Sustain process. Village Development Committees (VDCs), Self Help Groups and other village institutions are the vehicles of change and development, and their formation marks the first crucial level of "engagement" with a village' [...] These VDCs consist of key stakeholders within a village, with care being taken to eschew any vested interests and to represent those that are traditionally marginalized. VDC members plan, implement, monitor and support village level sustainable development interventions and postlaunch, they track, monitor and evaluate the success of these programmes. A unique feature of our model is that all the community members must contribute money. This is in addition to our annual allocation of funds, and helps to ensure involvement, ownership and accountability on the part of the villagers'. In this context of community involvement the Company explains the community grievance redressal mechanism (see indicator C.2) [Annual report 2023-24, 03/2024: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Provides two examples of engagement with communities: Although the Company explains its engagement with communities, no particular evidence was found showing two cases of engagement related to human rights impacts. It indicates that 'community members have the option to voice their concerns either to the local CSR manager overseeing sites or to the CSR Grievance Cell. out of the 25 complaints submitted by the communities in FY 23-24, 15 have been resolved'. However, no details found on actual engagement in the context of human rights. [Annual report 2023-24, 03/2024: <a href="https://www.suzlon.com">suzlon.com</a>] &amp; [Sustainability report 2023 - 2024, N/A: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Examples of engagement refer to marginalised groups and provide additional detail</li> <li>• Not Met: The company meets B2.C, B3.D, B4.D and B.5.C</li> </ul>
D.3.M	Benefit and ownership sharing policy	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Rewards for clients that have a commitment to identify potential benefit and ownership sharing</li> <li>• Not Met: Rewards for clients for disclosing statistics for each project (demographics of ownership sharing)</li> </ul>
D.4.M	Local wind & solar energy access, affordability	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Actions taken to support access and affordability of renewable energy in the value chain: As part of the work with communities, mid-term objectives include the program 'zero darkness' with the aim of 'lighting up unelectrified households and hamlets'. However, no further details were found [Annual report 2023-24, 03/2024: <a href="https://www.suzlon.com">suzlon.com</a>] &amp; [Sustainability report 2023 - 2024, N/A: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Public support for government policies addressing energy access</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Including a timebound action plan and reporting targets on supporting energy access and affordability in consultation with communities</li> </ul>

## 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"> <li>• Not Met: Expectation for clients to have commitment to respect land ownership/natural resources as in VGGT</li> <li>• Not Met: Steps taken to use leverage to resolve land rights issues</li> </ul>
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"> <li>• Not Met: Expectations for clients to commit to IFC PS 5 for physical and economic displacements</li> <li>• Not Met: Steps taken to use leverage</li> </ul>

## 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"> <li>• Not Met: Commitment to heightened HRDD in conflict affected areas</li> <li>• Not Met: Steps taken to assess and mitigate these risks with conflict sensitive lens</li> <li>• Not Met: How stakeholders are involved in the process to mitigate risks</li> </ul>
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"> <li>• Not Met: Description of implementation of security approach and example</li> <li>• Not Met: Description of monitoring of business partners</li> <li>• Not Met: Local communities engaged in assessment of security</li> <li>• Not Met: Example of working with community on this issue</li> </ul>

## G. Responsible mineral sourcing

Indicator Code	Indicator name	Score (out of 2)	Explanation
G.1.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"> <li>• Not Met: Policy statement on OECD Guidance aligned due diligence</li> <li>• Not Met: The policy explicitly covers all minerals</li> <li>• Not Met: Policy expectations of business relationships</li> <li>• Not Met: Contractual requirement for smelters/refiners to follow OECD</li> </ul>
G.2.M	Responsible sourcing of minerals: mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Identification and mapping of suppliers</li> <li>• Not Met: Traceability system for mineral supply chain</li> <li>• Not Met: Discloses smelters/refiners that are most significant part of supply chain</li> <li>• Not Met: Suppliers in higher risk activities, geographies, products</li> </ul>
G.3.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"> <li>• Not Met: Identification and prioritising of risks in supply chain</li> <li>• Not Met: Description of process to identify smelters/refiners and whether they carry out DD</li> <li>• Not Met: Disclosure of qualified smelters/refiners</li> <li>• Not Met: Processes cover minerals assessed as highest risk</li> </ul>

## H. Protection of human rights and environmental defenders

Indicator Code	Indicator name	Score (out of 2)	Explanation
H.1.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"> <li>• Not Met: Zero tolerance of threats/attacks on HRDs</li> <li>• Not Met: Expectation on business partners in value chain to make this commitment</li> <li>• Not Met: Description of how working with HRDs as part of risk assessment and DD</li> <li>• Not Met: Description of how working with HRDs to create safe and enabling environment</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.1.M	Health and safety	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Discloses quantitative information on H&amp;S in own operations (injury rate or lost days and fatalities) in last reporting period: The Company reports Lost time injury frequency rate, fatalities, fatality rate, Total recordable work-related injuries, total recordable incident rate and high consequence work-related injury or ill-health (excluding fatalities) for the last three reporting years. [Sustainability report 2023 - 2024, N/A: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Met: Expects disclosure of H&amp;S information of relevant business relationships: We proactively engage with our value chain partners to implement health and safety system in their operations and in the FY 23-24, 89.5% of our value chain partners were assessed on health &amp; safety practices and working conditions'. The Company reports figures on the indicators disclosed above for 'value chain workers'. [Sustainability report 2023 - 2024, N/A: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Targets for H&amp;S performance (including injury rates or lost days and fatalities)</li> <li>• Met: The Company describes the process(es) it has in place to identify its health and safety risks and impacts: The Company indicates that 'Our Occupational Health and Safety Management System (OHSMS) covers all workplaces, Occupational Health and Safety manufacturing plants, projects sites and operation and maintenance sites. All our employees and value chain workers are covered under OHSMS. The identification of hazards and risk assessment is conducted for all activities, whether routine or non-routine. Risks are evaluated using a rating scale, where the risk score is calculated by multiplying the severity and probability of the hazard'. It adds that 'We employ the Hazard Identification and Assessment of Risk and Opportunity (HIARO) method to meticulously evaluate and manage H&amp;S risks across our business activities. This process involves assessing potential physical, chemical, mechanical, and biological risks across our operations'. [Sustainability report 2023 - 2024, N/A: <a href="https://www.suzlon.com">suzlon.com</a>]</li> </ul>
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"> <li>• Not Met: Board level oversight over policies on forced labour in supply chain. How relevant stakeholders informed board discussions: Although there is a Board Committee tasked with sustainability oversight, which includes human rights, no specific evidence regarding explicit oversight of supply chain policies, including also a description of how experiences of affected workers inform board discussions. [Sustainability report 2023 - 2024, N/A: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Capacity building with suppliers</li> <li>• Not Met: Discloses ongoing efforts to prevent and mitigate forced labour in own ops and supply chain: The Company acknowledges forced labour risk: 'Any incidents of child labor or forced labor, human trafficking or any other such incident occurrence across the value chain may lead to deprivation of basic human rights'. It also states that 'regular training to the employees and business partners on human rights issues are provided'. No further details found on such trainings, including how specifically forced labour is covered. [Sustainability report 2023 - 2024, N/A: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Factors to be considered when ending a business relationship incl. responsible disengagement: The supplier code states that 'The violation or non-adherence of Supplier Code of Conduct or nonimplementation of corrective actions specified in a Corrective Action Plan within stipulated timeline can lead to suspension or termination of business relations with Suzlon'. However, it is not clear 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). [Supplier code of conduct, 22/07/2024: <a href="https://www.suzlon.com">suzlon.com</a>]</li> </ul>
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"> <li>• Not Met: Employer Pays Principle in policy for own ops and supply chain</li> <li>• Not Met: Describes work with suppliers on paying workers regularly, in full and on time</li> <li>• Not Met: Description of implementation and monitoring of this practice</li> <li>• Not Met: Requirements on paying in full and on time in supplier codes and contracts</li> </ul>
I.4.M	Prohibition of forced labour: Restrictions on workers	0.6667	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Requirements on free movement in supplier codes and contracts and own operations: The supplier code states that 'the supplier must ensure that all work is voluntary, without coercion or deception, and that workers have freedom of movement'. [Supplier code of conduct, 22/07/2024: <a href="https://www.suzlon.com">suzlon.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes working with suppliers on free movement of workers</li> <li>• Not Met: Description of implementation and monitoring of this practice</li> </ul>
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"> <li>• Not Met: Commitment on FoA/CB and requirements in suppliers codes and contracts: The Company states that 'We maintain open channels of communication with employee representatives and ensures that the rights of workers to form and join trade unions are upheld. We believe that constructive dialogue between management and employees is essential for maintaining a positive work environment'. Although the Company is committed to freedom of association and collective bargaining, no evidence found of measures in place to prevent intimidation or violence against workers seeking to exercise these rights. [Sustainability report 2023 - 2024, N/A: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Describes work with suppliers on FoA/CB</li> <li>• Not Met: Assessment of scope of restriction of FoA/CB in supply chain: The Company indicates that 'in FY 23-24 1,94% of our employees are covered under collective bargaining agreements'. However, no evidence was found of the Company conducting an assessment of the number affected by restrictions to freedom of association or collective bargaining in its supply chain [Sustainability report 2023 - 2024, N/A: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Global Framework Agreement</li> </ul>
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"> <li>• Not Met: Requirements on living wage in supplier codes and contracts</li> <li>• Not Met: Describes work with suppliers on living wage</li> <li>• Not Met: Description of process to determine living wages with unions: The Company indicates that 'Our compensation practices are regularly reviewed and benchmarked against industry standards to ensure that they remain competitive and equitable. Fair pay is a fundamental principle at our organization, and we are committed to ensuring that all employees are compensated fairly, transparently, and equitably'. However, no mention of living wage was found. Furthermore, no evidence was found that the Company involves unions or other worker representatives in the determination of wages. [Sustainability report 2023 - 2024, N/A: <a href="https://www.suzlon.com">suzlon.com</a>]</li> </ul>

#### 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"> <li>• Not Met: Expectation for business partners to conduct EIA: The Company indicates that 'During the year under review and as per applicable laws, environmental impact assessment is not applicable for any projects undertaken by Suzlon Group. However, few customers undertake environmental impact assessments of projects and share the findings based on which necessary mitigation measures are undertaken as may be relevant'. However, there is no evidence that the Company places this expectation on business partners. [Annual report 2023-24, 03/2024: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Expectation for business partners to publish EIA</li> <li>• Not Met: Expectation for business partners to explain CIA</li> </ul>
J.2.M	Life cycle assessment	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Conducts regular public life cycle assessments: The Company indicates that 'we plan to perform Product Carbon Footprint (PCF) and Life Cycle Assessments for WTGs (Wind Turbine Generators) by 2026'. No further references were found to LCA. [Sustainability report 2023 - 2024, N/A: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Reports on progress made on action plan</li> </ul>

#### 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"> <li>• Not Met: Commitment to prohibiting bribes to public officials: Regarding the impact identified of corruption and bribery, the Company indicates the following: 'We uphold strong ethical standards. Our directors and senior management follow a strict code of conduct. We have effective internal controls and a whistleblower mechanism, regularly evaluated by our management assurance and risk management teams. Continuous monitoring ensures alignment with our Code of Conduct. We have established clear reporting and whistleblowing channels'. It also indicates that 'There are specific protocols concerning gifts, favors and kickbacks from any external or internal party'. However, no evidence was found of an explicit commitment from the Company to not engage in any active or passive act of bribery and corruption including public officials, or employees of business relationships, or their relatives and associates, directly or through business intermediaries. [Annual</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			report 2023-24, 03/2024: <a href="https://www.suzlon.com">suzlon.com</a> ] & [Sustainability report 2023 - 2024, N/A: <a href="https://www.suzlon.com">suzlon.com</a> ] <ul style="list-style-type: none"> <li>• Not Met: Expectation extends to relevant business relationships</li> <li>• Not Met: Reports on any complaints on corruption and bribery: The Company notes that 'During the reporting period, none of our Directors, KMPs or employees faced any disciplinary action by any law enforcement agency for the charges of bribery or corruption. During the reporting period, there was 01 confirmed case of corruption within the organization, wherein the employee was dismissed'. No further details found on the case. [Sustainability report 2023 - 2024, N/A: <a href="https://www.suzlon.com">suzlon.com</a>]</li> </ul>
K.2.M	Payments to governments & contract transparency	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Not Met: Publishing a tax CbCR in line with GRI 207-4, or</li> <li>• Not Met: Disclosure of terms, contracts, agreements for those payments</li> <li>• Not Met: Supports governments to disclose contracts and licenses on renewable energy project in line with EITI</li> <li>• Not Met: Expectation for project developers clients to disclose payments to governments at project level (including on land and natural resources)</li> </ul>

## 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: <ul style="list-style-type: none"> <li>• Not Met: Provides mandatory and regular training as per ILO No 190: The Company indicates that 'we demonstrate a strong commitment to a safe and respectful work environment and train employees on Prevention of Sexual Harassment (POSH) policies'. The DEIB Policy states that 'the role of the DEIB council shall be to [...] conduct workshops, seminars and awareness campaigns to educate employees or members about the benefits of diversity and how to create an inclusive environment'. No further details found, including the number of people trained and training content, including ILO 190-related information. [DEIB Policy, 22/07/2024: <a href="https://www.suzlon.com">suzlon.com</a>] &amp; [Sustainability report 2023 - 2024, N/A: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Requires suppliers to provide training</li> <li>• Not Met: Provides materials and access to resources for trainings</li> <li>• Not Met: The trainings include gender-based violence and the Company's policies and mechanisms for addressing it: See above. Although the Company indicates that it trains employees in prevention of sexual harassment policies, no further details were found. [Sustainability report 2023 - 2024, N/A: <a href="https://www.suzlon.com">suzlon.com</a>]</li> </ul>
L.2.M	Gender balance and sensitivity	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Not Met: Timebound action plan to integrate gender lens to all relevant documents</li> <li>• Not Met: Demonstrates progress through annual reporting</li> <li>• Not Met: Women and non-binary people make up at least 40% of the Company's executives: According to Company disclosures one out of 10 members of the Executive committee are women. This does not meet the requirements under this indicator. [Annual report 2023-24, 03/2024: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Women and non-binary people make up at least 40% of the Company's board of directors: According to Company disclosures two out of 12 members of the Board are women. This does not meet the requirements under this indicator. [Annual report 2023-24, 03/2024: <a href="https://www.suzlon.com">suzlon.com</a>]</li> </ul>
L.3.M	Gender wage gap reporting	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Not Met: Has closed gender wage gap or timebound commitment: The Company indicates that 'We are committed to the principle of equal pay for equal work'. No further details were found, including any references to wage gap. [Sustainability report 2023 - 2024, N/A: <a href="https://www.suzlon.com">suzlon.com</a>]</li> <li>• Not Met: Reports information at company level across multiple pay bands</li> <li>• Not Met: Expects business relationships to do the same</li> </ul>

## 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"> <li>• Not Met: Public Commitment to create and provide or support access to green and decent jobs, as part of the low carbon transition.</li> <li>• Not Met: Demonstrates measures taken to create and support access to green and decent jobs for affected stakeholders.</li> <li>• Not Met: Demonstrates measures taken to ensure green and decent jobs promoting equality of opportunity for women and vulnerable groups</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> <li>• Not Met: Public commitment to re-and/or up-skills workers displaced by the transition to a low carbon economy.</li> <li>• Not Met: Disclosure of its process(es) for identifying skills gaps for workers and affected stakeholders, in the context of the low carbon transition.</li> <li>• Not Met: Demonstrates measures taken to provide re-and/or upskilling, training or education opportunities for relevant stakeholders.</li> <li>• Not Met: Demonstrates measures taken to ensure that the re-and/or upskilling, training or education opportunities promoting equality of opportunity for women and vulnerable groups.</li> </ul>
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"> <li>• Not Met: Discloses process(es) for aligning its lobbying activities with policies and regulation supporting the just transition.</li> <li>• Not Met: Discloses where its lobbying activities do not align with policies and regulation that support the just transition.</li> <li>• Not Met: Discloses action plan addressing misalignment of lobbying activities with policies and regulation that support just transition.</li> <li>• Not Met: Demonstrates lobbying for just transition and regulations enabling green and decent jobs, reskilling and/or social protection</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(0).0	Serious risks of supply chain forced labour		No allegations meeting the REB severity thresholds under this heading were found

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(1).0	Serious allegation No 1		No allegations meeting the REB severity thresholds under this heading were found

#### 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.

\* 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.

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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