

Human Rights Due Diligence Framework

Human Rights Due diligence is a continuous and proactive process integral to responsible business conduct. It enables the identification, assessment, and mitigation of potential risks and adverse impacts across our operations, value chain, and the products and services we deliver. These risks may pertain to environmental sustainability, social welfare, and the protection of fundamental human rights.

An effective human rights due diligence approach extends beyond internal accountability to encompass collective efforts aimed at addressing systemic challenges at both industry and national levels. Through collaborative action, we strive to foster sustainable solutions that uphold the dignity and well-being of vulnerable individuals and communities, thereby reinforcing our commitment to ethical and inclusive business practices.

Purpose of this framework

ReNew's unwavering respect for human rights constitutes the non-negotiable foundation of our business operations. Our human rights strategy is firmly anchored in the United Nations Guiding Principles on Business and Human Rights (UNGPs), which serve as the global standard for responsible corporate conduct.

This document outlines ReNew's approach to Human Rights Due Diligence (HRDD), a core operational principle of the UNGPs. It is intended to be a continuously evolving framework, subject to regular updates that incorporate emerging insights that illustrate the application of our commitments in real-world contexts.

Human Rights Risk Identification

We are committed to identifying, evaluating, and addressing actual and potential human rights risks across our operations, supply chain, and business relationships. As a leader in the clean energy sector, we are attentive to risks associated with land acquisition, community engagement, labour practices, and environmental impact. We also consider geography-specific factors such as regulatory environments, socio-economic conditions, and the presence of vulnerable populations in regions where our projects are located. These contextual insights allow us to tailor our risk assessments to the realities on the ground and to respond with appropriate mitigation strategies. Our assessments are guided by internationally recognised standards, including the **UN Universal Declaration of Human Rights (UDHR)**, **United Nations Global Compact** and **OECD Due Diligence Guidance for Responsible Business Conduct**, **International Labour Organization (ILO) standards** and local laws & regulations.

We recognise that human rights risks are not uniform and they vary significantly depending on the sector in which we operate and the geographic context. Sector-specific risks may include labour exploitation in manufacturing, land rights violations in agricultural land sourcing, or privacy concerns in digital services. Geography-specific risks may arise in regions with weak governance, limited legal protections, or systemic discrimination. Our assessments consider these contextual factors to ensure that our risk identification is both relevant and responsive to local realities.

Scope of the Framework

ReNew's HRDD framework is designed to ensure that human rights considerations are systematically integrated into every facet of our business. This framework aligns with global standards and reflects our commitment to ethical, inclusive, and sustainable growth.

The scope of the framework extends to:

- **Direct operations**, including corporate offices, project development sites, and operational facilities and manufacturing sites across India
- **Employees** (whether employed on a temporary, fixed term, permanent or part-time basis), including those working with ReNew's subsidiaries, and ReNew's **contractors and business partners**. ReNew expects all its service providers to adhere to this policy when operating from ReNew's sites **Local communities**, particularly those residing near project sites, whose rights, livelihoods, and access to resources may be affected
- **Vulnerable groups**, including:
 - Own employees
 - Women
 - Children
 - Indigenous peoples
 - Migrant workers
 - Third-party employees
 - Local communities

Scope of Risk Identification

Our HRDD process encompasses a multi-layered approach to risk identification, ensuring that human rights considerations are integrated into both strategic and operational decision-making. The key areas of focus include:

- **Own Operations:** We assess human rights risks within our direct business activities, including corporate functions, project development, and operational sites. This includes evaluating labour conditions, workplace safety, and employee rights.
- **Value Chain and Related Activities:** We extend our risk assessments to suppliers, contractors, and other entities within our value chain. This includes monitoring labour practices, ethical sourcing, and community impacts associated with all our projects.
- **New Business Relationships:** Human rights risks are systematically evaluated during the initiation of new business relationships, including mergers, acquisitions, joint ventures, and strategic partnerships. Due diligence is conducted to ensure alignment with our human rights commitments and to prevent exposure to unethical practices.
- **Periodic Review of Risk Mapping:** ReNew conducts regular reviews of its human rights risk mapping to reflect evolving business contexts, regulatory developments, and stakeholder feedback. This systematic reassessment allows us to update mitigation strategies and remain responsive to emerging risks.

Human Rights Issues Covered/Identified

Through our HRDD process, ReNew actively monitors and addresses a range of actual and potential human rights issues.

As part of ReNew's human rights due diligence (HRDD) process, we have identified a focused set of actual and potential human rights risks that are most relevant to our operations and value chain. These issues are prioritised based on severity, likelihood, and the potential impact on affected individuals and communities. These priorities were shaped through internal assessments, stakeholder engagement, and sector-specific risk analysis. Accordingly, we actively monitor and address issues such as forced labour, modern slavery and human trafficking, child labour, freedom of association, the right to collective bargaining, discrimination, land rights and Indigenous rights, and broader concerns around ethical conduct. Our commitment to addressing these risks is reflected in our policies, training programs, stakeholder engagement efforts, and grievance mechanisms.

Governance Structure and Oversight

The operational oversight rests with the designated functional Apex Committee member, who ensures the day-to-day integration of human rights considerations across relevant business functions. Overall accountability and strategic oversight are jointly shared by the Chief Sustainability Officer (CSO) and the Chief Human Resources Officer (CHRO), who guide the alignment of human rights priorities with ReNew's broader sustainability and people strategies. This governance structure facilitates coordinated decision-making, continuous monitoring, and effective implementation of human rights commitments throughout the organization and its value chain.

Our Approach to HRDD Framework

1. Identification and Assessment of Adverse Impacts

ReNew actively identifies and assesses potentially adverse impacts of its business activities on human rights. This process involves a regular review of human rights issues to determine which ones require priority attention. Each issue is carefully examined to understand how it relates to ReNew, whether our business activities directly cause the impact, contribute to it indirectly, or are connected through our partners or supply chain. We also assess how serious the impact could be and how likely it is to happen, so we can respond appropriately and prioritise effectively. When incidents are flagged through media reports or external sources, ReNew conducts a thorough assessment to understand the nature and implications of the issue. Conversations with stakeholders are held when necessary to validate findings and guide prioritisation.

2. Prevention and Mitigation of Adverse Impacts

If adverse human rights impacts are identified, ReNew will take proactive steps to prevent or mitigate them. The company has established policies and procedures for its business operations to address such risks. All employees, contractors, and suppliers are

expected to adhere to these standards, which are communicated through training, contractual obligations, and codes of conduct. These mechanisms are designed to ensure that human rights are respected throughout the organisation and its value chain. In cases where material incidents are detected, ReNew investigates the response of the involved party such as a client or supplier and engages with them to request improvements or corrective actions as needed.

Refer to our Human Rights Policy [here](#).

3. Monitoring of Response Status

ReNew's commitment to respecting and protecting human rights includes actively monitoring the status of its responses to identified risks and grievances. Through ongoing due diligence and issue management, the company seeks to minimize adverse impacts and ensure that concerns raised by affected stakeholders are addressed effectively. The management also ensures a strong commitment to driving continuous improvement of this Human Rights Policy, reinforcing accountability and enhancing practices across its operations.

4. Disclosure and Publication of Information

Transparency is a key principle in ReNew's approach to human rights. The company discloses its initiatives, progress, and challenges through public documents such as the Human Rights Report and the Annual Integrated Report. These publications reflect ReNew's commitment to accountability and continuous improvement in respecting human rights across its operations and partnerships.

For Employees and Contract Workers

ReNew applies its HRDD framework to workforce by embedding human rights principles into workplace policies, labour practices, and grievance mechanisms. The company regularly assesses risks such as discrimination, forced labour, child labour, and violations of freedom of association. Training programs are conducted to raise awareness of rights and responsibilities, and internal audits are used to monitor compliance.

For Suppliers

Suppliers are subject to ReNew's HRDD through pre-engagement screening, contractual obligations, and ongoing monitoring. The company evaluates risks such as labour exploitation, human trafficking, and child labour within its value chain. Suppliers are required to adhere to ReNew's Code of Business Conduct and Ethics & Supplier Code of Conduct, which includes human rights standards. In cases of non-compliance or material incidents, ReNew engages directly with the supplier to assess their response and demand improvements.

For Local Communities

ReNew engages with local communities through stakeholder consultations, impact assessments, and community development initiatives. The HRDD framework helps identify risks related to land use, displacement, cultural rights, and access to resources. ReNew

prioritises dialogue with community members to understand their concerns and co-develop mitigation strategies. Feedback mechanisms are in place to ensure that grievances are heard and addressed, and periodic reviews are conducted to evaluate the effectiveness of community engagement efforts. Through its CSR initiatives, ReNew has empowered local communities by enhancing skill development and elevating their standards of living.

For Investors and Shareholders

ReNew engages with investors and shareholders by ensuring transparency and accountability in its human rights practices. The Human Rights Due Diligence framework is reflected in the company's formal disclosures, which outline key risks, mitigation strategies, and progress made. Management remains committed to continuously strengthening the Human Rights Policy, ensuring it resolves grievances from affected stakeholders.

Prevention and Mitigation Measures

ReNew is committed to proactively preventing and mitigating adverse human rights impacts across its operations and value chain. The company has embedded human rights safeguards into its business processes, ensuring that risks are addressed before they escalate into violations.

To prevent potential human rights issues, ReNew has established comprehensive policies and procedures that align with international standards and national regulations. These include guidelines on labor practices, non-discrimination, child protection, and ethical sourcing. All employees, contractors, and suppliers are expected to adhere to these standards, which are communicated through training, contractual obligations, and codes of conduct.

When adverse impacts are identified through internal assessments, stakeholder feedback, or external sources, ReNew initiates targeted mitigation actions. This may involve revising operational practices, engaging with affected parties, or working directly with suppliers and partners to implement corrective measures. In cases of material incidents, ReNew evaluates the response of the involved entity and, where necessary, initiates dialogue to request improvements or enforce compliance.

The company also prioritises continuous improvement by integrating lessons learned from past incidents into future planning. This dynamic approach ensures that prevention and mitigation efforts remain effective, responsive, and aligned with ReNew's commitment to respecting human rights.

Grievance Mechanism

An effective grievance mechanism is a vital component of ReNew's Human Rights Due Diligence framework. It enables individuals and communities to raise concerns related to human rights in a safe, confidential, and structured manner. ReNew is committed to ensuring that all stakeholders including employees, contract workers, suppliers, business partners, local communities and vulnerable groups have access to this mechanism and are empowered to use it without fear of retaliation.

All stakeholders are trained on the grievance process as part of ReNew's broader human rights and ethics awareness programs. This ensures that everyone understands their rights,

knows how to lodge a complaint, and is aware of the support available throughout the process. Complaints can be submitted anonymously and, in any format – written, verbal, or digital, depending on the preference and accessibility of the individual.

ReNew has established dedicated channels for reporting any form of unprofessional behavior, misconduct, or human rights concerns. Stakeholders can file complaints directly via email to grievance.manager@renew.com, where trained personnel handle each case with discretion and urgency. Upon receiving a complaint, ReNew initiates a structured assessment to determine the nature and severity of the issue, followed by appropriate action to resolve it.

The grievance mechanism is designed not only to address individual incidents but also to inform broader improvements in policy and practice. Grievance trends and outcomes are periodically reviewed to inform decision-making, strengthen accountability, and support continuous improvement across operations.

Our Commitment to Action

The Human Rights Due Diligence framework at ReNew embodies our steadfast commitment to ethical governance, stakeholder inclusivity, and sustainable development. By systematically identifying, assessing, and addressing human rights risks across our operations and value chain, we reinforce our responsibility as conscientious corporate citizens. This framework not only ensures compliance with international standards and national regulations but also fosters a culture of transparency, accountability, and continuous improvement. As we advance toward our strategic goals, we remain resolute in our belief that respecting and promoting human rights is fundamental to building resilient communities, trusted partnerships, and long-term business value.