

# **Human Rights Due Diligence (HRDD) Report**

**FY 2024-25**

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## Executive Summary

ReNew reaffirms its commitment to ethical and inclusive growth through this Human Rights Due Diligence (HRDD) Report, which outlines the company's structured approach to identifying, assessing, and mitigating human rights risks across its operations and supply chain. ReNew recognises that environmental sustainability must be matched by social responsibility, ensuring that its business practices uphold the dignity, safety, and rights of all stakeholders.

This report builds on ReNew's broader ESG strategy and aligns with the international frameworks mentioned in detail in the report. The HRDD process was conducted in two distinct phases to ensure comprehensive coverage and meaningful insights. **Phase I** involved a desk-based review and assessment, carried out internally by designated SPOCs across ReNew's operational sites and through the Supplier Sustainability Cell (SSC) for suppliers. This phase covered virtually 100% of ReNew's operations and included documentation review for 100% of the critical suppliers. **Phase II** will be focused on detailed on-site assessments of all manufacturing facilities and selected solar, wind, hydro sites, and suppliers.

ReNew began by identifying potential human rights-related risks through benchmarking against international frameworks. These risks included child labour, forced labour, discrimination, fair wages, occupational health and safety, and the rights of migrant and indigenous communities. To assess these risks, ReNew employed a Double Materiality Assessment (DMA) and Sustainable Supply Chain Engagement (SSC) in parallel. The DMA covered 100% of ReNew's operations including the corporate office, manufacturing units, and renewable energy sites while the SSC evaluated 100% of the critical suppliers through a third-party assessment. These risks were prioritized based on their potential impact on people and the business, and mitigation strategies were developed accordingly.

In order to strengthen the governance around human rights risks, ReNew has implemented enhanced supplier screening and onboarding protocols, strengthened grievance redressal mechanisms including whistleblower protections, and delivered targeted human rights training for employees and contractors. Inclusive workplace policies fostering gender equity and non-discrimination have been institutionalized, alongside independent third-party supplier assessments to ensure compliance and continuous improvement. Governance of human rights at ReNew is structured to ensure clear accountability and oversight. Operational responsibility rests with the designated functional Apex Committee member, while overall governance is jointly overseen by the Chief Sustainability Officer (CSO) and Chief Human Resources Officer (CHRO), enabling coordinated leadership across key functions. Human rights performance indicators are embedded in ESG disclosures, investor communications, and internal audit processes.

ReNew has delivered over 631,944 hours of safety and human rights training. Approximately 49% of security staff received human rights training, underscoring ReNew's commitment to ethical conduct and respectful engagement across operational sites. ReNew actively communicated tailored mitigation measures and recommendations to relevant stakeholders whenever risks were detected. All 53 critical suppliers (100%) received tailored mitigation plans to address specific risks and align with ReNew's ethical and operational standards; out of these, 29 have committed to act within a specific time period. The company also actively

engages local communities to promote sustainable development and minimise environmental and social impacts, adhering to ethical land acquisition and security practices.

As ReNew moves forward, the company will deepen its commitment to human rights by expanding field-level engagement, refining supplier oversight, and embedding human rights metrics into its broader ESG performance framework. By integrating human rights into every facet of its operations, ReNew aims to set a benchmark for responsible business conduct in the renewable energy sector, ensuring that its growth is not only sustainable, but also equitable and transformative.

## Introduction

ReNew Energy Global Plc (“ReNew”) is a leading global decarbonisation solutions provider, incorporated under the laws of England and Wales and listed on Nasdaq (Nasdaq: RNW, RNWWW). With a robust clean energy portfolio of 18.5 GW (*as of May 31, 2025*) on a gross basis, ReNew operates globally and deeply anchored in India’s energy landscape, driving innovation and sustainability. Since its founding in 2011, ReNew has remained at the forefront of combating climate change by delivering a comprehensive suite of solutions, including utility-scale wind and solar, hydropower, energy storage, digitalisation, solar manufacturing, and emerging technologies such as green hydrogen and carbon markets.

ReNew’s commitment to sustainability extends beyond environmental stewardship to encompass the protection and promotion of human rights. The Company recognises that respect for human rights is a foundational pillar of a just, inclusive, and resilient society. ReNew is aware of its responsibility to respect, protect, and promote human rights across its operations, supply chains, and communities. This commitment is central to ReNew’s long-term resilience, stakeholder trust, and contribution to inclusive development.

This Human Rights Due Diligence Report reflects ReNew’s progress in identifying, assessing, and addressing human rights risks and opportunities across its value chain. It showcases the company’s efforts to uphold the rights of workers, communities, and vulnerable groups, while fostering a culture of respect, inclusion, and ethical conduct. ReNew is translating its human rights commitments into measurable progress by deepening supplier collaboration, advancing inclusive workplace practices, and reinforcing transparent grievance redressal systems driven by a shared vision with its employees, partners, and global stakeholders.

As ReNew moves forward, it remains committed to learning, adapting, and leading by example. The journey toward human rights stewardship is ongoing, and this report serves as both a reflection of progress and a roadmap for the future.

## ReNew’s Commitment to Human Rights

ReNew believes that businesses have both the responsibility to respect human rights and the capacity to actively safeguard them. As part of its commitment to ethical and sustainable operations, ReNew has established a robust Human Rights Due Diligence Framework that guides its actions across all levels of the organization and its value chain.

ReNew’s Human Rights Policy, Code of Business Conduct and Ethics and Supplier Code of Conduct, are grounded in internationally recognized standards, including the **UN Universal**

**Declaration of Human Rights (UDHR), United Nations Global Compact (UNGC) principles and the OECD Due Diligence Guidance for Responsible Business Conduct.** These policies reflect ReNew's dedication to upholding the dignity, freedom, and equality of all individuals impacted by its business activities.

ReNew also draws on the principles outlined in the **UN Guiding Principles on Business and Human Rights** and the **OECD Guidelines for Multinational Enterprises**, ensuring that its approach is aligned with global best practices. These frameworks inform ReNew's efforts to identify, prevent, and mitigate adverse human rights impacts across its operations, supply chains, and stakeholder engagements.

The [Human Rights Policy](#) applies to all entities within the ReNew group across business units, geographies, and functions and extends to suppliers, contractors, and other business partners. It serves as a foundational reference for ReNew's values and expectations regarding labor rights, non-discrimination, health and safety, freedom of association, and access to remedy. The policy is regularly reviewed and updated to reflect evolving standards and stakeholder expectations.

ReNew is committed to continuous improvement in its human rights performance. Through proactive risk assessments, stakeholder consultations, and grievance mechanisms, the company seeks to embed human rights considerations into strategic decision-making and day-to-day operations. This ensures that ReNew not only meets its legal and ethical obligations but also contributes meaningfully to a more just and equitable global society.

## Scope of the Assessment

ReNew's HRDD process covers 100% of our operational footprint, including our own operations, 1.6% contractors and Tier I suppliers. A total of 53 Suppliers (100% Critical Suppliers) were assessed on ESG criteria, accounting for 91% of our emissions and 73% of our spend. Currently, ReNew does not have any joint ventures as we focus on wholly owned projects and strategic acquisitions. This comprehensive coverage ensures that human rights considerations are embedded across all levels of our business and supply chain.

In FY 2023-24, ReNew conducted its first Double Materiality Assessment (DMA), which enabled us to prioritize human rights risks based on both financial and impact materiality. This assessment was supported by a thorough review of our Enterprise Risk Management (ERM) framework to identify newly emerging human rights-related risks. The DMA has been refreshed in the current reporting year to reflect evolving stakeholder expectations and risk dynamics.

To ensure a robust and inclusive assessment, we undertook extensive consultations with our Apex Committee (ApCom), whose expertise helped identify all relevant material topics, including salient human rights issues. We also engaged in wide-ranging stakeholder interactions through dedicated Double Materiality workshops and received over 300 responses to customized surveys shared with internal and external stakeholders.

Further reinforcing our commitment to a responsible and future-ready supply chain, in FY 2024-25, ReNew partnered with a third-party expert to conduct a comprehensive assessment of our critical suppliers. This evaluation provided valuable insights into supplier performance

and highlighted key areas of strength and improvement, with a particular focus on human rights practices across our supply chain ecosystem. As part of this effort, ReNew also implemented a Traceability and Forced Labour Guidelines to enhance transparency and ethical sourcing, achieving full traceability for solar wafers and over 95% traceability for newly procured solar cells and modules.

## **Human Rights Governance and Policy Framework**

Human rights governance at ReNew is structured to ensure clear accountability and effective oversight across all levels of the organization. The Human Rights Due Diligence is overseen by the by the designated functional Apex Committee member, while overall governance and strategic oversight are jointly held by the Chief Sustainability Officer (CSO) and Chief Human Resources Officer (CHRO), ensuring coordinated leadership and accountability. This collaborative governance model ensures that human rights considerations are systematically integrated into ReNew's operational practices, workforce policies, and supply chain management.

Our governance approach is anchored by a robust policy framework that guides our commitment to ethical conduct and responsible business. ReNew's Human Rights Policy affirms our respect for the dignity, freedom, and equality of all individuals. It outlines our expectations for fair treatment, non-discrimination, and zero tolerance for child labor, forced labor, harassment, or exploitation. Guiding principles within this framework include respect and inclusion, safe and fair working conditions, transparency and accountability, stakeholder engagement, and continuous improvement.

Together, the CSO, CHRO alongwith the functional Apex Committee members monitor compliance, assess risks, and drive continuous improvement across our operations and supply chain. Human rights issues are addressed proactively through supplier assessments, stakeholder engagement, and internal reviews. This governance structure enables ReNew to uphold its values, respond effectively to emerging challenges, and foster a culture of respect, inclusion, and accountability throughout the organization.

## **Our Approach to Human Rights Due Diligence**

To strengthen its commitment to ethical business practices and stakeholder well-being, ReNew partnered with an independent third-party expert to conduct a comprehensive HRDD assessment. The methodology is structured into two distinct phases to ensure a comprehensive and credible assessment of human rights risks across its operations and supply chain. This phased approach allows for both strategic desk-based analysis and on-ground verification, aligning with global standards and stakeholder expectations.

### **a. Phase I: Desk-Based Assessment**

The first phase focused on mapping human rights risks through structured research, stakeholder engagement, and policy analysis. This foundational assessment was aligned with international standards and designed to inform future remediation and field-level validation. ReNew conducted a comprehensive internal desk-based assessment across its own operations. Supplier assessment questionnaires (SAQ) were circulated to all identified critical suppliers. These questionnaires aimed to evaluate supplier practices across key human rights

dimensions including child labour, forced labour, fair working conditions, and freedom of association. Responses were collected and analyzed, providing valuable insights into supplier-level risks, documentation gaps, and areas requiring further engagement or verification.

### Step 1: Identify

The first step of the assessment focused on identifying potential human rights risks across ReNew's operations and supply chain. This began with a comprehensive mapping of human rights requirements against globally recognized frameworks, and other relevant sectoral and regional standards. This mapping exercise helped establish a clear benchmark for evaluating ReNew's current practices and obligations. In parallel, a stakeholder profiling exercise was conducted to identify groups most vulnerable to human rights impacts. These included contract workers, migrant laborers, women, and local communities, particularly those residing near project sites or engaged in outsourced activities. To gather baseline data, ReNew developed structured questionnaires tailored to different stakeholder groups. These were distributed to internal teams, , and other relevant actors, enabling the collection of insights on existing policies, operational practices, perceived risks, and areas of concern. In parallel, ReNew partnered with a third-party expert to conduct a comprehensive assessment of its critical suppliers. Supplier Assessment Questionnaires (SAQs) were circulated to evaluate practices across key human rights issues. The data collected during this phase formed the foundation for the subsequent assessment and gap analysis.

### Step 2: Assess

In the second step, ReNew undertook a detailed evaluation of its existing human rights policies and governance structures to assess their alignment with international standards. The review focused on the scope, clarity, and implementation of the Human Rights Policy, as well as its integration into operational and supply chain protocols. Responses from the structured questionnaires were analyzed alongside supporting documentation such as supplier codes of conduct, audit reports, and internal training materials. This evidence-based analysis helped identify systemic strengths and areas where practices fell short of global expectations. This benchmarking exercise provided a clear view of ReNew's current performance and highlighted specific areas for improvement, particularly in relation to labor rights, grievance mechanisms, and supplier oversight.

### Step 3: Remediate, Report, and Communicate

The final step of Phase I focused on translating assessment findings into actionable recommendations and strategic communication. Based on the identified gaps, updates were proposed to strengthen ReNew's human rights policies, governance mechanisms, and operational controls. These recommendations are aimed to enhance policy clarity, improve supplier engagement, and reinforce internal accountability. High-risk areas such as sites with high dependency on contract labor or suppliers were identified as key focus areas to strengthen systemic safeguards, improve monitoring mechanisms, and enhance overall human rights governance. Preliminary mitigation strategies were developed to address these risks, including enhanced due diligence protocols, targeted audits, and capacity-building initiatives. A high-level HRDD risk and remediation report was prepared to summarize key findings, risk hotspots, and recommended actions. This report now serves as a strategic input for Phase II and broader ESG planning. Additionally, outputs from Phase I are being

integrated into ReNew's public disclosures, reinforcing the organization's dedication to ethical and inclusive business practices.

### **b. Phase II: On-Site Assessment**

Phase II of the process will focus on physical verification of the findings and recommendations identified during the desk-based assessment in Phase I. This phase will involve on-site visits to operational locations and sites to validate the implementation of human rights policies, assess working conditions, and engage directly with affected stakeholder groups. Through interviews, observations, and field-level documentation, the team will evaluate the effectiveness of existing controls and identify any discrepancies between reported practices and ground realities. For suppliers, ReNew will carry out virtual assessments of selected critical suppliers, including virtual interviews, documentation reviews, and walkthroughs where feasible. The insights gathered during Phase II will be instrumental in refining mitigation strategies, strengthening governance mechanisms, and ensuring that ReNew's human rights commitments are upheld in practice. This phase will also support the development of a more robust and evidence-based remediation framework, contributing to transparent disclosures and continuous improvement across the organization.

### **Salient Human Rights Risks**

As part of its commitment to ethical operations, the company has identified a range of salient human rights issues that may arise across its direct operations and extended supply chain. These include risks related to child labour, discrimination, forced labour, fair remuneration, occupational health and safety, and the rights of vulnerable groups such as migrant workers and indigenous communities. Each issue is addressed with a combination of preventive measures, monitoring systems, and grievance redressal mechanisms accessible to all stakeholders with clear procedures for resolution and follow-up. This ensures that human dignity, equity, and justice are upheld throughout the organization's value chain.

#### **a. Child Labour**

ReNew maintains a strict zero-tolerance policy towards child labour across all its operations and supply chain. To ensure compliance, the HR team conducts internal audits at every site and location, verifying the age of all employees. A centralized system-based repository is maintained, storing official documents such as Aadhaar and PAN cards to confirm that no individual below the legal working age is employed. Contractors are also required to verify the age of their workforce during onboarding, and vendor agreements include specific clauses prohibiting child labour. These practices are transparently disclosed in ReNew's Business Responsibility and Sustainability Report (BRSR) and are aligned with Global Reporting Initiative (GRI) standards, reinforcing the company's commitment to ethical employment. During Sustainable Supply Chain engagement, it was observed that critical suppliers had aligned their practices with legal standards prohibiting child labor. They have policies in place to prevent the employment of minors, reflecting a commitment to ethical labor practices.

#### **b. Discrimination**

ReNew is committed to fostering a workplace free from discrimination, ensuring equal



treatment and opportunities for all individuals regardless of gender, caste, religion, or background. A comprehensive grievance redressal mechanism is in place for employees, workers, communities, customers, value chain partners, shareholders, and investors. The company upholds the principle of equal pay for equal work, with compensation determined solely by skills, experience, and job performance. ReNew has adopted a Gender Pay Parity Policy to proactively monitor and address any gender-based pay disparities. This policy reinforces our commitment to fairness, transparency, and inclusive growth across all levels of the organization. We have also implemented a dedicated Prevention of Sexual Harassment (POSH) policy across all operational sites. The policies are actively communicated to employees and contract workers through multiple channels, including visible displays on site notice boards, integration into onboarding and regular training sessions, and reinforcement during workplace sensitization programs. All reported incidents of discrimination are investigated promptly, impartially, and confidentially by the ethics committee, with resolution timelines aligned to legal requirements. ReNew strictly prohibits retaliation against individuals who report discrimination or participate in investigations, and any such behavior is met with disciplinary action. These practices are comprehensively documented in ReNew's BRSR and are fully aligned with the GRI standards. All suppliers affirmed their commitment to non-discrimination.

### **c. Diversity and Inclusivity**

ReNew actively promotes diversity and inclusivity throughout its recruitment and workplace practices. The hiring process is designed to encourage applications from individuals of all backgrounds, including marginalized communities and people with disabilities. Infrastructure at operational sites includes accessible features such as ramps and specially designed toilets to accommodate differently abled individuals. Diversity and inclusivity are recognized as material topics in ReNew's Double Materiality Assessment (DMA), and the associated data has been audited by third-party agencies to ensure accuracy and accountability. The suppliers also claimed compliance with diversity, equity, and inclusion (DEI) principles.

### **d. Fair and Safe Working Conditions**

Ensuring safe and dignified working conditions is a core priority for ReNew. Regular internal checks are conducted at all operational sites to ensure adherence to safety protocols and identify areas for improvement. These checks are complemented by both scheduled and ad hoc audits. In FY 2024-25, ReNew collaborated with the British Safety Council to conduct 54 external audits – 26 during asset creation, 1 at a manufacturing facility, and 27 across asset management sites. Additionally, 42 internal audits were carried out by ReNew's trained internal auditors, focusing on site-level implementation, hazard identification, and corrective actions. Extensive safety training programs are implemented, with a total of 631,944 hours of safety training delivered to employees and workers in FY 2024-25. Personal protective equipment (PPE) is provided free of cost, and gender-segregated sanitation and rest areas are available at sites. Employees and workers are encouraged to promptly report any health, safety and environment related observations such as spills, environmental events, incidents, or unsafe conditions and incidents including near misses to ensure swift and effective resolution. Incidents are reported and documented using consistent organisational protocols across all sites through the Gensuite Platform. Suppliers reported that fair and safe working conditions are maintained.

#### **e. Education, Skills Development, Training**

ReNew places strong emphasis on continuous learning and skill development for its workforce. Structured induction programs are provided to all new hires, including contractual workers, ensuring they are well-integrated into the company's culture and operations. Regular training sessions are conducted through classroom formats and the ReNew Academy, covering safety protocols, technical skills, and job-specific competencies. These programs are tailored to different workforce categories and are audited by third-party agencies to ensure quality and relevance. The training data has been verified by a third-party and reported in our BRSR. Through SSC assessment, it was indicated that necessary training is provided to employees and workers.

#### **f. Fair Remuneration**

ReNew ensures transparent and equitable compensation practices across its workforce. All employees and workers receive clear, itemized payslips detailing wages, statutory deductions, and benefits. The company is committed to equal remuneration for all, regardless of gender, and actively works to minimize pay gaps. Statutory benefits such as Provident Fund, Employee State Insurance (ESI), maternity and paternity leave, bonuses, and gratuity are provided in accordance with applicable labour laws. ReNew is committed to upholding the principle of fair pay, ensuring that all workers receive wages aligned with their roles, responsibilities, and applicable legal standards. Information related to fair wages is transparently disclosed in our BRSR. Suppliers confirmed that employees receive wages at or above the statutory minimum and that they do not rely on overtime to meet basic income needs.

#### **g. Forced or Compulsory Labour**

ReNew strictly prohibits forced or bonded labour in its operations and supply chain. Contractual agreements with vendors and subcontractors include clauses mandating adherence to labour laws and explicitly prohibiting coercive practices. Any violation of these clauses can result in immediate termination of the contract. The company's variable pay policy is designed to be fair and transparent, aligning with industry's best practices and recognizing employee contributions. Grievance redressal channels are clearly defined and accessible, with policy guidelines displayed prominently across all sites to ensure awareness and accountability. Suppliers stated adherence to applicable national labor laws, including the Labor Law and Labor Contract Law, and explicitly prohibit forced labor. To further validate these commitments, Phase II of the HRDD process will focus on acquiring additional evidence through targeted engagement and virtual assessments, enhancing visibility into supplier practices.

#### **h. Freedom of Association & Right to Collective Bargaining**

ReNew respects the right of employees to freely associate and join trade unions, in accordance with applicable laws and regulations. While no workers are currently unionized, the company remains open to engaging in collective bargaining should such representation arise in the future. This commitment to freedom of association is also reflected in ReNew's GRI-aligned disclosures, demonstrating its support for democratic workplace practices.

### i. Rights of Migrant Workers

At present, ReNew does not directly employ migrant workers. However, the company ensures that contractors if at all engage migrant labourers uphold their rights and comply with relevant labour laws. ReNew maintains oversight of contractor practices and has committed to conducting a detailed assessment of migrant worker conditions in Phase II of its human rights due diligence process, ensuring comprehensive coverage and protection. The suppliers have policies in place to protect the rights of migrant workers. To further validate these commitments and assess implementation, Phase II of the HRDD process will focus on gathering additional evidence.

### j. Health & Nutrition

ReNew prioritizes the health and nutritional well-being of its workforce. Health check-ups are conducted during onboarding, throughout employment, and annually to monitor and maintain employee wellness. Canteens and food facilities at operational sites are regularly inspected to ensure hygiene, food safety, and nutritional standards are consistently upheld. Suppliers reported that new and departing employees undergo physical examinations, and first-aid kits are available on-site.

### k. Indigenous People Issues

ReNew is committed to respecting the rights of indigenous communities and avoiding adverse impacts on their livelihoods. The company acquires only Class-I land from farmers after thorough due diligence and does not occupy disputed or indigenous territories. In cases where project development may affect local households, ReNew implements mitigation measures to minimize negative impacts and ensure fair compensation and support.

### l. Community Issues

ReNew actively engages with local communities to promote sustainable development and minimize environmental and social impacts. The facilities maintain a strict no-discharge policy for water effluents beyond its premises. No untreated or inadequately treated wastewater is discharged into water bodies, and no ecosystems have been impacted by runoff or effluent from any of our operations. To eliminate pollution risks from domestic wastewater, ReNew has installed Zero Liquid Discharge (ZLD) systems at both its manufacturing facility and hydro site, ensuring responsible water management. Environmental and Social Impact Assessments (ESIA) are conducted at project sites, and measures such as water sprinkling are implemented during dust-generating activities. Periodic monitoring of air, water, and noise levels is carried out, and waste is segregated, stored, and disposed of in accordance with regulatory requirements. ReNew is committed to fostering an inclusive and equitable workplace through its Equal Opportunity Policy, which ensures that all individuals have fair access to employment, advancement, and development opportunities. The suppliers, demonstrated a structured mechanism for engaging with local communities.

### m. Land Rights

ReNew demonstrates its commitment to ethical land practices by voluntarily considering and disclosing ongoing land-related disputes and litigations in its Human Rights Due Diligence. While these challenges reflect concerns raised by external stakeholders, the company's openness and active pursuit of resolution through legal channels and community engagement reflects a responsible and inclusive approach. By compensating landowners above

government-mandated rates for Class-I land, ReNew reinforces its dedication to fairness, transparency, and continuous improvement in stakeholder relationships.

## n. Security

ReNew maintains a secure working environment through regular monitoring and patrols conducted by security personnel. Site teams hold periodic meetings to ensure continuous improvements and security teams report directly to site in-charges, ensuring accountability and swift response to any concerns. In alignment with ReNew's commitment to human rights, all security staff undergo dedicated training.

## Impact Assessment and Findings

Based on a comprehensive review of ReNew's salient human rights risks across its operations and supply chain, the following impact assessment and findings have been identified. These highlight areas of strength, ongoing challenges, and opportunities for improved management of human rights impacts.

Total sites where risks have been identified based on virtual assessments conducted in phase 1 are as following:

- Own operations: 27.27%
- Critical suppliers: 92.45% of the suppliers assessed, have been identified with some form of human rights risks, spread across low to medium risk categories

Some sites exhibited land-related issues as part of the overall assessment. From SSC engagement, risks have been identified across prohibition of child labour, non-discrimination, diversity and inclusion, Freedom of association & the right to collective bargaining and health and nutrition. To ensure a thorough evaluation, ReNew will initiate a comprehensive third-party assessment in Phase II.

Key Human Rights Issue	Impact & Risk Overview: Own Operations	Mitigation Actions/Recommendations	Impact & Risk Overview: Suppliers	Mitigation Actions/Recommendations
Child Labour	Zero-tolerance child labour policy and age verification controls in place. Renew is adhering to this policy	Robust policy and systems in place, no remediation needed.  Detailed onsite assessment will follow in phase II	Suppliers have policies prohibiting child labour	Suppliers were recommended to develop relevant policies, that clearly state their commitment towards ensuring zero violation of child labour in their operations.  Renew mandates all suppliers through onboarding and contract documents that no

				<p>child labour is employed by them.</p> <p>To meet the requirements of Renew's contract documents, suppliers have implemented Induction cards issued to the contractors and workers which includes their age details for transparency</p>
<b>Discrimination</b>	Robust policies Comprehensive anti-discrimination policies, grievance mechanisms, and POSH policy in place	-	Suppliers committed to non-discrimination	Suppliers were recommended to develop relevant policies, that clearly state their commitment towards ensuring zero tolerance of discriminatory practices. Suggested to conduct training sessions to promote non-discrimination. ReNew shall verify the implementation in Phase II through a third-party assessment
<b>Diversity and Inclusivity</b>	Inclusive recruitment, accessible infrastructure, and Third party audited DEI data in place	-	Suppliers claimed DEI compliance	Suppliers were recommended to set quantifiable targets to be achieved in short, medium and long term
<b>Fair and Safe Working Conditions</b>	Extensive safety training and certification programs, and grievance registers in place	Continued monitoring will ensure consistency and responsiveness	Suppliers reported fair conditions	Suppliers were recommended to conduct safety audits

<b>Education, Skills, Development, Training</b>	Structured training programs covering safety and technical skills, Dedicated training wing	-	Training claimed by suppliers	Suppliers were suggested to conduct training sessions to promote non-discrimination and initiate HRDD for their operations
<b>Fair Remuneration</b>	Transparent, equitable pay reported in accordance with statutory requirements	Continued benchmarking will help maintain competitiveness and fairness	Suppliers reported compliance	Suppliers were recommended that wage benchmarks and audit reports shall be thoroughly verified
<b>Forced or Compulsory Labour</b>	Zero tolerance embedded in contracts and policies	-	Suppliers affirmed compliance	Suppliers were recommended to conduct third-party verification of labour practices
<b>Freedom of Association &amp; Right to Collective Bargaining</b>	Respects employee rights; no unions currently but open to engaging in collective bargaining	Establish structured worker engagement platforms such as worker councils, anonymous feedback systems, and regular dialogue forums to ensure representation and voice in the absence of formal unions	Suppliers complied with labour laws	Suppliers were recommended to encourage transparent worker representation mechanisms
<b>Rights of Migrant Workers</b>	Not applicable	-	Suppliers have policies	Suppliers were suggested to ensure policies are documented and inclusive
<b>Health &amp; Nutrition</b>	Regular health check-ups, hygienic canteens, and nutrition standards	-	Suppliers have proper health infrastructure	Suppliers were recommended to conduct robust occupational health infrastructure and periodic health assessments
<b>Indigenous People Issues</b>	Ethical land acquisition and mitigation measures	Maintain proactive engagement in sensitive regions	Limited direct impact on suppliers	-
<b>Community Issues</b>	Active local engagement	-	Proper mechanism to engage with	Suppliers were recommended to

			communities in place	strengthen CSR activities
<b>Land Rights</b>	Fair compensation provided; above mandates; on-going land disputes	Strengthen stakeholder engagement by involving local communities, legal experts, and independent mediators. Develop a transparent resolution roadmap with clear timelines and public reporting	Limited direct impact on suppliers	-
<b>Security</b>	Regular monitoring by security personnel;	-	Limited direct impact on suppliers	-

## Mitigation and Remediation Measures

### a. Coverage of Mitigation Actions Across Operational Layers

Following the HRDD assessment, ReNew prioritized mitigation actions across its operational footprint. The percentage of sites with identified risks where mitigation actions have to be taken is as follows:

Operational Category	% of Risk Sites with Mitigation Actions
Own Operations	100%
Contractors & Tier I Suppliers	54.7%

### b. Processes implemented to mitigate human rights risks

ReNew has adopted a structured and multi-layered approach to mitigate human rights risks across its operations, supply chain, and partnerships. The company has strengthened supplier governance by introducing mandatory human rights screening during supplier selection, embedding ethical labour clauses in contracts, and conducting periodic audits, including third-party assessments of critical suppliers and contractors. These measures ensure that human rights standards are upheld throughout the procurement process.

Internally, ReNew has embedded human rights principles into its Code of Conduct and sustainability policies, reinforcing a culture of respect and accountability. Targeted training programs have been rolled out for employees, contractors, and suppliers, covering key topics such as non-discrimination, fair wages, and grievance redressal. These sessions also promote awareness of international frameworks like the UN Guiding Principles on Business and Human Rights (UNGPs) and India's National Guidelines on Responsible Business Conduct (NGRBC). Additionally, we recognize labour rights risks in the Solar PV value chain, and ensure ethical

sourcing by avoiding high-risk regions and mandating supplier compliance with ILO conventions. Through our Traceability and Supply Chain Due Diligence Framework and Traceability Addendum, we enable component-level traceability and require regular supplier declarations, affirming adherence to human rights and labour standards.

To ensure transparency and responsiveness, ReNew has expanded its grievance redressal mechanisms. The whistleblower platform supports anonymous reporting of human rights violations, and multilingual, culturally sensitive channels have been established to serve vulnerable worker groups. These systems are backed by clear escalation protocols and timely resolution processes.

Special attention is being given to protecting vulnerable groups, including migrant workers, women, and indigenous communities. ReNew has conducted need assessments to identify region-specific vulnerabilities and partnered with NGOs and community organizations to build awareness and capacity. Workplace safeguards such as anti-harassment policies, gender-sensitive infrastructure, and inclusive hiring practices have been implemented to foster equity and safety. The suppliers have responded to a structured questionnaire and their responses and respective documentary evidence have been assessed by a third party. Recommendations have been provided against Minor, Major and Critical Observations. The suppliers have agreed to the recommendations and have provided a timeline to implement these Corrective Action Plans.

To uphold decent work standards, ReNew mandates that all agencies engaging contract workforce strictly adhere to the payment of minimum wages as prescribed by applicable laws. The company monitors working hours, and occupational health standards using digital compliance tools, aligning its practices with the principles of UNSDGs.

### c. Number of sites with mitigation plans

Mitigation plans are underway at the following number of sites:

- **Own Operations:** 03 sites (All 100% of the sites where risks were identified)
- **Contractors & Tier I Suppliers:** 29 suppliers (54.7% of suppliers where risks were identified)

These plans are tailored to the specific risks identified at each location and are monitored for effectiveness.

### d. Type of remediation actions taken

Where human rights issues have been identified, ReNew has taken swift and context-sensitive remediation actions. Corrective action plans have been issued to suppliers and contractors, with defined timelines to ensure compliance. Where gaps are identified, ReNew engages suppliers to address concerns and strengthen practices. Continued alignment is encouraged through ongoing dialogue, and appropriate actions are taken to uphold responsible sourcing principles.

Fair and timely compensation has been provided to affected households at identified project sites, in accordance with the nature and extent of impact. ReNew has also facilitated community-level engagement, particularly with indigenous and local populations, to address their concerns.



Through SAQ, wide range of remediation actions are in the process of implementation at the supplier's end. Some of these Include (but not limited to) Development of policy commitment (around Human rights), setting quantifiable targets, conducting human rights training and HRDD. The suppliers have been suggested to implement these actions within a maximum of 6 months. The timeline has been agreed by the suppliers.

100% of critical suppliers assessed fall under the low to medium risk category, with 71% classified as low risk and 29% as medium risk. Some of the key deficiencies noted amongst the remaining suppliers include absence of policy and procedure around human rights, absence of detailed risk assessments, weakness in health and safety practices, lack of training and capacity building, weakness or absence of traceability practices, no commitment on diversity, Equity, Inclusion (DEI) etc. These suppliers have been recommended (with granular details) to strengthen their systems and procedures, review and revise their risk assessment and management systems, establish monitoring mechanisms, define policies & targets, generate awareness amongst the workforce and value chain. Suppliers have acknowledged the recommendations and have committed to work towards the betterment of their approaches, as per suggestion, within an agreed and realistic timeline.

Insights from Phase I of the HRDD process have informed the design of Phase II, which will focus on deeper field-level engagement and continuous improvement. Policy reforms have been initiated based on field learnings and stakeholder feedback, ensuring that remediation efforts evolve alongside ReNew's broader ESG and governance goals.

## Roadmap Ahead

As ReNew continues to scale its operations, embedding human rights into its business strategy remains a key priority. Looking ahead, the company aims to build on the global standards already integrated during Phase I by strengthening implementation across internal policies and operational practices. The next step is the execution of Phase II: Physical Verification, which will involve on-site assessments at selected operational locations and supplier facilities.

To promote transparency and accountability, ReNew will continue to integrate HRDD findings into its ESG disclosures and stakeholder communications. ReNew also plans to conduct regular human rights impact assessments across its operational sites and supply chains, supported by a dynamic risk mapping system that highlights vulnerable geographies and communities. Stakeholder engagement will be deepened through enhanced grievance mechanisms, annual dialogues, and transparent disclosures on risks and mitigation efforts. Finally, the company will implement a robust monitoring and evaluation framework, including third-party audits to ensure continuous improvement and alignment with the best global practices. By creating a culture of responsibility, inclusiveness, and ethical conduct, ReNew aims to not only mitigate risks but also create shared value for all stakeholders.

## Annexure

The table below presents a comprehensive mapping of key human rights issues relevant to ReNew's operations, aligned with internationally recognized human rights standards. It highlights the activities and stakeholders most affected, as well as the groups most vulnerable to adverse impacts. This framework serves as a foundational tool for assessing ReNew's human rights risks and responsibilities, guiding ethical decision-making and inclusive policy development across its value chain.

Key Human Rights Issue	Internationally Recognized Human Rights	Affected Stakeholders	Most Vulnerable Groups
<b>Child Labour</b>	Freedom from child labor (ICCPR 24 - ICESCR 10.3) / Right to education (UDHR art 26) / Right to a family life (UDHR art 16.3) / Protection from economic exploitation (CRC art 32) / UNGC Principle 5	Operations/Supply chain/Other activities (Employees/workers, local communities)	Children
<b>Discrimination</b>	Freedom from discrimination (UDHR art 1 and 2) / Equal pay for equal work (UDHR art 23.2) / Freedom of belief and religion (UDHR art 18) / Rights of minorities (ICCPR art 27) / UNGC Principle 6	Operations/Supply chain/Other activities (Employees/workers and local communities)	Women, minorities, persons with disabilities, local communities (including Indigenous people)
<b>Diversity and Inclusivity</b>	Right to equality and non-discrimination (UDHR art 2) / UNGC Principle 6	Operations (employees)	Women, minorities, persons with disabilities
<b>Fair and Safe Working Conditions</b>	Freedom from degrading treatment (UDHR art 5) / Right to just and favorable working conditions (UDHR art 23.1) / Right to equal treatment (UDHR art 1 and 2) / Freedom of expression (UDHR art 19) / UNGC Principle 1	Operations/Supply chain (Employees/workers)	Women, minorities, persons with disabilities
<b>Education, Skills, Development, Training</b>	Right to education (UDHR art 26) / Right to work (UDHR art 23.1) / UNGC Principle 1	Operations / Other activities (employees, trainees)	Young workers, women, economically disadvantaged groups
<b>Fair Remuneration</b>	Equal pay for equal work (UDHR art 23.2) / Right to just and favorable working conditions	Operations/Supply chain (Employees/workers)	Women, minorities, persons with disabilities, migrant workers, contract laborers

	(UDHR art 23.1) / UNGC Principle 1		
<b>Forced or Compulsory Labour</b>	Right not to be subjected to slavery, servitude or forced labor (UDHR art 4 and 5) / Freedom of movement (UDHR art 13) / UNGC Principle 4	Operations/Supply chain/Other activities (Employees/workers)	Migrant and temporary employees/ workers
<b>Freedom of Association &amp; Right to Collective Bargaining</b>	Right to belong to a trade union and bargain collectively (UDHR art 23.4) / Freedom of association (UDHR art 23.1) / Right to strike (ICESCR art 8.1 [d]) / UNGC Principle 3	Operations/Supply chain (Employees/workers)	Employees/workers (in general)
<b>Rights of Migrant Workers</b>	Right to equal protection of the law (ICCPR art 26) / Right to work (ICESCR art 6) / UNGC Principle 1	Supply chain / Other activities (migrant workers)	Migrant laborers, seasonal workers
<b>Health &amp; Nutrition</b>	Right to health (ICESCR art 12.1) / Right to life (UDHR art 3) / UNGC Principle 1	Operations/Supply chain (Employees/workers)	Pregnant women, night workers, young workers
<b>Indigenous People Issues</b>	Rights of minorities (ICCPR art 27) / Right to culture and land (UNDRIP) / UNGC Principle 1	Community engagement / Land use activities	Indigenous peoples, tribal communities
<b>Community Issues</b>	Right to participation and development (UDHR art 21) / Right to adequate standard of living (ICESCR art 11) / UNGC Principle 1	Other activities (local communities)	Economically marginalized communities, rural populations
<b>Land Rights</b>	Right to property (UDHR art 17) / Right to adequate housing (ICESCR art 11.1) / UNGC Principle 1	Community engagement / Project development	Indigenous peoples, land-dependent communities
<b>Security</b>	Right to life, liberty and security (UDHR art 3) / Freedom from arbitrary interference (ICCPR art 9) / UNGC Principle 1	Operations / Community engagement (employees, local communities)	Women, vulnerable community members

*CRC- Convention on the Rights of the Child*

*ICCPR- International Covenant on Civil and Political Rights*

*ICESCR- International Covenant on Economic, Social and Cultural Rights*

*UNDRIP- United Nations Declaration on the Rights of Indigenous Peoples*

*UDHR- Universal Declaration of Human Rights*

*UNGC- United Nations Global Compact*