



Business & Human Rights
Resource Centre

Renewable Energy & Human Rights Benchmark Methodology

A photograph showing a person in a brown jacket and grey pants working on a rooftop solar panel installation. The person is holding a large solar panel in place, which is being supported by a metal frame. Other solar panels are already installed on the roof. In the background, there are residential buildings and hills under a clear sky.

Context

The need for a global transition to a low-carbon economy is urgent. Investors, businesses, and governments must lead on fundamental shifts in our energy systems in order to achieve climate and energy access goals set out in the Paris Agreement and the Sustainable Development Goals, including moving from fossil fuels to renewable energy. However, this shift will only result in a sustainable low-carbon future if respect for human rights underpins it from the outset as part of a just transition.

Many of the same human rights abuses associated with the extractives and agribusiness industries are now occurring in renewable energy projects and supply chains, and early indications show this industry is ill-prepared to address them. Between 2010 and June 2019, the Business & Human Rights Resource Centre identified 152 allegations of abuses related to renewable energy projects and asked 103 companies to respond to these allegations.¹ At the same time, our baseline studies² analysing the policies of 108 companies in five major renewable energy subsectors (solar, wind, geothermal, bioenergy, and hydropower) identified significant gaps with regard to human rights policy and practice. Nearly half of the companies analysed were found not to have a basic human rights policy in place, and several of the companies that did have human rights policies nonetheless had human rights allegations against them, demonstrating a lack of effective policy implementation.

Increased investment in renewable energy must be coupled with corporate human rights due diligence to ensure companies respect the rights of indigenous and affected communities as well as labour rights throughout supply chains. Upholding human rights is not just a moral and normative responsibility for all companies, there is also a compelling business case: neglecting to do so can result in delays or cancellations of renewable energy projects, threatening financial investments as well as our collective goal of keeping the planet habitable for future generations.

¹ For more information on the types of allegations, including breakdowns by renewable energy subsector, see the Resource Centre's June 2019 briefing, [Fast and Fair Renewable Energy Investments: A Practical Guide for Investors](#).

² For a full analysis of company policies and behaviors, see the Resource Centre's two briefings: [Renewable Energy Impacts on Communities](#), and [Renewable Energy: Risking Rights and Returns](#).

Benchmark Methodology

This benchmark methodology is the result of three years of research, analysis, and global consultations. It establishes the first-ever set of indicators against which renewable energy companies' human rights policies and practices can be evaluated both on an individual company level and in comparison to their industry peers. The pilot benchmark, including company names and scores, will be released in 2020. It will aim to create a race to the top on human rights in the renewable energy sector, bolstered by investors, in support of a just transition to a low-carbon economy.

The methodology consists of two main sections:

1 Core United Nations (UN) Guiding Principles indicators from the Corporate Human Rights Benchmark (50% weighting): These indicators cover core elements companies in any sector are expected to undertake as per the UN Guiding Principles on Business and Human Rights, using the well-established methodology of the [Corporate Human Rights Benchmark](#). They are primarily policy and process indicators and cover the following themes:

- Theme A:** Governance and Policy Commitments
- Theme B:** Embedding Respect and Human Rights Due Diligence
- Theme C:** Remedies and Grievance Mechanisms

2 Renewable Energy Sector-Specific indicators (50% weighting): These indicators were developed through a combination of seven global in-person consultations,³ individual interviews, and an online consultation period. More than 100 individuals engaged in the consultation processes, representing civil society, indigenous peoples, affected communities, investors, renewable energy companies, and academics, among others. An advisory group of experts in these fields also provided in-depth feedback on the indicators.

The sector-specific indicators often complement policy and process indicators covered under the Core UN Guiding Principles indicators with more specific practice and performance proxies. These indicators cover the following themes:

- Theme D:** Indigenous Peoples' and Affected Communities' Rights
- Theme E:** Land Rights
- Theme F:** Security and High-Risk Contexts
- Theme G:** Human Rights and Environmental Defenders
- Theme H:** Labour, Health, and Safety
- Theme I:** Right to a Healthy and Clean Environment
- Theme J:** Transparency and Anti-Corruption
- Theme K:** Equality and Inclusion

The indicators aim to be both ambitious and achievable, with scoring options to differentiate between companies that do not meet basic expectations, those that have some commitments and practices in place, and those that demonstrate a serious commitment to proactive and agile human rights due diligence. Because the human rights risks in the renewables sector are complex and overlapping, many indicators in our methodology reinforce or build on one another. For example, fundamental labour rights policy commitments are addressed in the Core UN Guiding Principle indicators while the labour rights measurement theme in the Renewable Energy Sector-Specific indicators section measures company practices that complement these policy commitments. While we are no longer seeking input on the indicators for the pilot phase, we welcome any reactions and feedback from stakeholders as we move towards the benchmark release in 2020.

³ Consultations were held in Paris, Washington DC, London, Nairobi, San Francisco, Palo Alto, and Mexico City.

We incorporated indicators that aim to serve as proxies for performance, but it is nonetheless possible a company that scores well on paper could be revealed to fall short on implementation. One approach to addressing this discrepancy between policy and performance is to note when companies face lawsuits or semi-judicial complaints on human rights, as this indicates a failure to effectively implement their stated policies. We will incorporate this approach and continue our core organisational work of collecting and seeking responses to allegations of corporate human rights abuses, including as they relate to the companies in the benchmark.

Company Selection

The pilot benchmark will rank some of the largest publicly traded renewable energy companies in the world, representing over 130,000 MW of wind and solar operating capacity, as per Bloomberg's New Energy Finance database. The companies are headquartered in nine countries and together have operations in all regions of the world. While project scale and scope are not the only measurements for influence, large companies often can spur the most progress across their industry. The list of company names, scores, and scoring analysis will be released along with the pilot benchmark in 2020.

The focus on wind and solar for the pilot benchmark is due to the rapid expansion of these technologies as compared to other renewable energy sub-sectors. In future iterations of the benchmark we hope to expand to other renewable energy sub-sectors, including bioenergy, geothermal, and hydropower. It is important to note that we agree with serious concerns raised by many environmental groups who believe [large-scale hydropower](#) and [some forms of bioenergy](#) should not be considered sustainable energy sources because of their human and environmental impacts. Hydropower and bioenergy are included in our work on new energy sources to ensure they are held accountable for their policies, practices, and impacts, especially as many investors classify them as renewable energy in their portfolios. To exclude these subsectors would have the perverse effect of not holding them to account on respect for human rights. While each of these five energy sources have the potential to [contribute to a decarbonised future](#), each of them – and most notably, large-scale hydropower – also have allegations of human rights abuses associated with their production, often intimately linked to environmental destruction.

Next Steps

We will be conducting a review and analysis of all publicly available information from the selected companies in order to evaluate them under this methodology. Companies will be provided the opportunity to review their initial scores and feed into the information gathering phase. As only publicly available information will be evaluated in the benchmark, companies may wish to make additional relevant information public prior to the end of the research period. The pilot benchmark will be released in 2020, followed by a round of outreach to key stakeholders including companies, investors, and members of communities impacted by renewable energy projects.

Methodology Indicators

Core United Nations Guiding Principles Indicators from the Corporate Human Rights Benchmark

Theme A. Governance and Policy Commitments

A.1.1 Commitment to respect human rights

The Company publicly commits to respecting human rights across its activities. It must be clear the commitment relates to all internationally recognised human rights, rather than to only one or more selected human rights. This only considers commitments to avoid adverse human rights impacts and does not include philanthropic commitments.

SCORE 1

The Company has a publicly available statement of policy committing it to respect human rights **OR** the ten principles of the UN Global Compact (as principles 1 and 2 include a commitment to respect human rights) **OR** the rights under the Universal Declaration of Human Rights (UDHR) **OR** the International Bill of Human Rights.

SCORE 2

The Company's publicly available statement of policy also commits it to: the UN Guiding Principles on Business and Human Rights **OR** the OECD Guidelines for Multinational Enterprises.

A.1.2 Commitment to respect the human rights of workers

The Company publicly commits to respecting the principles concerning fundamental rights at work in the eight ILO core conventions as set out in the Declaration on Fundamental Principles and Rights at Work, together with those human rights of workers that are particularly relevant to the industry. It also has a publicly available statement of policy committing it to respect the human rights of workers in its business relationships, and in particular respecting the rights of workers in its supply chain.

SCORE 1

The Company has a publicly available statement of policy committing it to respecting the human rights that the ILO has declared to be fundamental rights at work (ILO Core Labour Standards) **OR** the Company has a publicly available statement of policy committing it to respecting the ten principles of the UN Global Compact (principles 3 to 6 are based on the ILO Declaration on Fundamental Principles and Rights at Work). **AND**, in addition to one of the above, the Company's policy commitment(s) also states that it expects its suppliers to commit to respecting each of the ILO core labour standards and explicitly lists them in that commitment.

SCORE 2

The Company's policy statement on the ILO Core Labour Standards includes explicit commitments to respect: freedom of association and the right to collective bargaining and the rights not to be subject to forced labour, child labour or discrimination in respect of employment and occupation. **AND** the Company's publicly available statement of policy also commits it to respecting the ILO conventions on labour standards on working hours and the health and safety of its workers **AND** the Company's policy commitment(s) also states that it expects its suppliers to commit to respecting the ILO conventions on labour standards on working hours and the health and safety of their workers.

A.1.4 Commitment to engage with stakeholders

The Company publicly commits to engage with its stakeholders, including potentially and actually affected stakeholders, and/or their legitimate representatives.

SCORE 1

The Company has a publicly available statement of policy committing it to engage with its potentially and actually affected stakeholders, including in local communities where relevant **OR** there is evidence that the Company regularly engages with potentially and actually affected stakeholders and/or their legitimate representatives.

SCORE 2

The Company's publicly available statement of policy also commits it to engaging with affected stakeholders and/or their legitimate representatives in the development or monitoring of its human rights approach **OR** there is evidence that the Company regularly engages with potentially and actually affected stakeholders and/or their legitimate representatives in the development or monitoring of its human rights approach.

I A.1.5 Commitment to remedy

The Company publicly commits to providing for or cooperating in remediation for affected individuals, workers and communities through legitimate processes (including judicial and non-judicial mechanisms, as appropriate), where it identifies that it has caused or contributed to adverse impacts.

SCORE 1

The Company has a publicly available statement of policy committing it to remedy the adverse impacts on individuals, workers and communities that it has caused or contributed to.

SCORE 2

The policy commitment also includes a commitment to the following: Working with its suppliers to remedy adverse impacts which are directly linked to its operations, products or services through the suppliers' own mechanisms or through collaborating with its suppliers on the development of third party non-judicial remedies **AND** the Company's policy commitment recognises its approach to remedy should not obstruct access to other remedies, or it includes commitments to collaborating in initiatives that provide access to remedy.

Theme B. Embedding Respect & Human Rights Due Diligence

I B.1.1 Embedding: Responsibility and resources for day-to-day human rights functions

The Company outlines senior level responsibility for human rights within the Company as well as the organisation of the day-to-day responsibility for human rights across relevant internal functions.

SCORE 1

The Company indicates the senior manager role(s) responsible for relevant human rights issues within the Company (i.e. responsibility for human rights is assigned to a senior manager(s)) and this includes responsibility for the ILO core labour standards at a minimum.

SCORE 2

The Company also describes how day-to-day responsibility is allocated across the range of relevant functions of the Company. **AND** The Company describes how day-to-day responsibility for managing human rights issues within its supply chain is allocated.

I B.2.1 Identifying: Processes and triggers for identifying human rights risks and impacts

The Company proactively identifies its human rights risks and impacts on an on-going basis, including when these are triggered by key moments of the Company's activities (e.g. policy change, market entry, new projects, amongst others).

SCORE 1

The Company describes the process(es) to identify its human rights risks and impacts: in specific locations or activities, covering its own operations (i.e. impacts that it may cause or contribute to) **AND** through relevant business relationships, including its supply chain.

SCORE 2

The Company describes the global systems it has in place to identify its human rights risks and impacts on a regular basis across its activities, in consultation with affected or potentially affected stakeholders and internal or independent external human rights experts. This includes how the systems are triggered by new country operations, new business relationships or changes in the human rights context in particular locations. **AND** The Company's description includes an explanation of when human rights impact assessments (HRIAs) or environmental and social impact assessments (ESIAs) covering human rights are/will be carried out.

I B.2.2 Assessing: Assessment of risks and impacts identified (salient and key industry risks)

Having identified its human rights risks and impacts, the Company assesses them and then prioritises its salient human rights risks and impacts.

SCORE 1

The Company describes its process(es) for assessing its human rights risks and impacts and what it considers to be its salient human rights issues including how relevant factors are taken into account, such as geographical, economic, social and other factors **OR** The Company publicly discloses the results of the assessments, which may be aggregated across its operations and locations.

SCORE 2

The Company meets both of the requirements under Score 1.

B.2.3 Integrating and Acting: Integrating assessment findings internally and taking appropriate action

The Company integrates the findings of its assessments of human rights risks and impacts into relevant internal functions and processes by taking appropriate actions to prevent, mitigate or remediate its salient human rights issues.

SCORE 1

The Company describes its global system to take action to prevent, mitigate or remediate its salient human rights issues, **AND** this includes a description of how its global system applies to its supply chain **OR** The Company provides an example of the specific conclusions reached and actions taken or to be taken on at least one of its salient human rights issues as a result of assessment processes in at least one of its activities/operations.

SCORE 2

The Company meets both of the requirements under Score 1.

B.2.4 Tracking:

Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts

The Company tracks and evaluates the effectiveness of actions taken in response to its human rights risks and impacts and describes how it uses that information to improve processes and systems on an ongoing basis.

SCORE 1

The Company describes the system(s) for tracking the actions taken in response to human rights risks and impacts assessed and for evaluating whether the actions have been effective or have missed key issues or not produced the desired results. **OR** It provides an example of the lessons learned while tracking the effectiveness of its actions on at least one of its salient human rights issues as a result of the due diligence process.

SCORE 2

The Company meets both of the requirements under Score 1.

B.2.5 Reporting: Accounting for how human rights impacts are addressed

The Company communicates externally how it addresses its human rights impacts in a manner that is accessible to its intended audiences, especially affected stakeholders who have raised concerns, providing enough information to evaluate the adequacy of the response(s) and does not pose risks to affected stakeholders or personnel. This communication is distinct from engagement with potentially affected stakeholders for the purposes of assessing or addressing specific impacts (See also Indicators B.2.1 and B.2.2)

SCORE 1

The Company describes or demonstrates how it communicates externally about its human rights impacts and how effective it has been in addressing those impacts (i.e. through the steps described in B.2.1 to B.2.4) **AND** The description includes communications covering human rights impacts involving the Company's supply chain.

SCORE 2

The Company also describes how it has responded to specific human rights concerns raised by, or on behalf of, affected stakeholders. **AND** The Company also describes how it ensures that the affected or potentially affected stakeholders and their legitimate representatives are able to access these communications.

Theme C. Remedies and Grievance Mechanisms

C.1 Grievance channels/mechanisms to receive complaints or concerns from workers

The Company has one or more channel(s)/mechanism(s) (its own, third party or shared) through which workers can raise complaints or concerns, including in relation to human rights issues. The channel(s)/mechanism(s) is available to all workers and takes into account accessibility by marginalised groups. The channel(s)/mechanism(s) is not used to undermine the role of legitimate trade unions (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law) in addressing labour-related disputes, nor to preclude access to judicial or other non-judicial grievance mechanisms.

SCORE 1

The Company indicates that it has one or more channel(s)/mechanism(s), or participates in a shared mechanism, accessible to all workers to raise complaints or concerns related to the Company.

SCORE 2

The Company also discloses data about the practical operation of the channel(s)/mechanism(s), including the number of grievances about human rights issues filed, addressed or resolved. **AND** The Company indicates that the channel(s)/mechanism(s) is available in all appropriate languages. **AND** The workers in its supply chain have access to either: the Company's own channel(s)/mechanism(s) to raise complaints or concerns about human rights issues at the Company's suppliers or the Company expects its suppliers to establish a channel/mechanism for their workers to raise such complaints or concerns and to convey the same expectation on access to grievance channel(s) / mechanism(s) to their own suppliers.

C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities

The Company has one or more channel(s)/mechanism(s) (its own, third party or shared) through which individuals and communities of users who may be adversely impacted by the Company can raise complaints or concerns, including in relation to human rights issues.

SCORE 1

The Company indicates that it has one or more channel(s)/mechanism(s), or participates in a shared mechanism, accessible to all external individuals and communities who may be adversely impacted by the Company (or individuals or organisations acting on their behalf or who are otherwise in a position to be aware of adverse impacts) to raise complaints or concerns, including about human rights issues related to the Company, particularly in high risk locations.

SCORE 2

The Company also describes how it ensures the channel(s)/mechanism(s) is accessible to all potentially affected external stakeholders at all its own operations, including in local languages. **AND** The Company describes how it ensures external individuals and communities have access to the Company's own channel(s)/mechanism(s) to raise complaints or concerns about human rights issues at the Company's suppliers or the Company expects its suppliers to establish a channel/mechanism for them to raise such complaints or concerns, and to convey the same expectation on access to grievance channel(s) / mechanism(s) to their suppliers.

C.7 Remedying adverse impacts and incorporating lessons learned

The Company provides for or cooperates in remediation to victims where it has identified that it has caused or contributed to adverse human rights impacts (or others have brought such information to the Company's attention, such as through its grievance channel(s)/mechanism(s)). It also incorporates the lessons learned from remediation approaches into its channel(s)/mechanism(s) and processes to prevent future impacts.

SCORE 1

For adverse human rights impacts which it has caused or to which it has contributed, the Company describes the approach it took to provide or enable a timely remedy for victims, **OR** if no adverse impacts have been identified then the Company describes the approach it would take to provide or enable timely remedy for victims.

SCORE 2

For adverse human rights impacts which it has caused or to which it has contributed, the Company also describes changes to systems and procedures to prevent similar adverse impacts in the future **OR** if no adverse impacts have been identified then the Company describes the approach it would take to review and change systems and procedures to prevent similar adverse impacts in the future. **AND** The Company provides an evaluation of the effectiveness of the grievance channel(s)/mechanism(s).

Renewable Energy Sector-Specific Indicators

Theme D. Indigenous Peoples' and Affected Communities' Rights

I D.1 Commitment to respect indigenous peoples' rights

The Company commits to respect indigenous peoples' rights and describes how that commitment is implemented in practice.

SCORE 1

The Company has a public policy committing to respect indigenous peoples' rights in line with international law and standards, through its own operations and through supply chains and business relationships. The policy explicitly references and commits to respecting the rights outlined in the UN Declaration on the Rights of Indigenous Peoples **OR** the policy explicitly references and commits to all of the following: right to customary, ancestral, and collective lands, territories, and resources; right to practice cultural traditions; right to self-determination; right to livelihood; and right to free, prior and informed consent (including the right to reject to projects or major project updates).

SCORE 2

The Company meets the criteria in SCORE 1 **AND** describes its process, in adherence with international standards, for understanding who is an indigenous person and what constitutes customary, ancestral, or collective land, territories, and resources.

I D.2 Commitment to respect all affected communities' rights

The Company discloses key information regarding the implementation of its policies on affected communities' rights (in addition to engagement as outlined in A.1.4). It ensures that these policies are applied equitably to all stakeholders within affected communities, with particular attention to traditionally marginalized groups.

SCORE 1

The Company has a public policy committing to respect the rights of all communities affected by its projects and operations (including right to livelihoods, right to land, right to health, right to a healthy environment, consultations, etc) **AND** the Company regularly (at least annually) publishes information on the implementation of this policy that includes a description of how affected communities were identified, how consultations took place, if and how traditionally marginalized groups were included (for example, women, indigenous peoples, afro-descendants, religious minorities, people with disabilities, LGBTQA+, children), evidence of if, how, and when free, prior and informed consent for projects was achieved, and what happened when it was not. **OR** if the Company has not engaged in any projects affecting specific communities in the annual reporting period, it states that and describes its approach in relation to all elements above.

SCORE 2

The Company's policy extends this expectation to all relevant suppliers, contractors, subcontractors, and other business relationships, **AND** its policy and implementation reports are published in all relevant local languages.

I D.3 Benefit and ownership sharing policy

The Company discloses its process for engaging with affected communities for identifying benefit and ownership sharing opportunities, and reports on the implementation of that process.

SCORE 1

The Company has a public policy to identify potential benefit and ownership sharing options that serve affected communities. This policy recognises that affected communities have a right to decide their own priorities in terms of how they may benefit from projects.

SCORE 2

The Company discloses statistics for each of its projects and/or operations describing the demographics of its benefits and ownership sharing processes, including any final agreements, and if and how members of affected communities participated in the decision-making.

Theme E. Land Rights

E.1 Commitment to respect land rights

The Company commits to respect land rights in its own operations and extends this commitment to relevant business relationships.

SCORE 1

The Company has a public policy committing to respecting land rights of legitimate tenure rights holders as set out in the UN Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests, including where land titles are not formally recorded.

SCORE 2

The Company's policy extends this expectation to all relevant suppliers, contractors, subcontractors, and other business relationships.

E.2 Land acquisition in supply chains

The Company discloses its process for identifying legitimate tenure rights holders in its own operations and extends this commitment to relevant business relationships.

SCORE 1

When acquiring, leasing or making other arrangements to use (or restrict the use of) land in its own operations, the Company has a policy in place to identify legitimate tenure rights holders, with particular attention to vulnerable tenure rights holders.

SCORE 2

The Company's policy extends this expectation to all relevant suppliers, contractors, subcontractors, and other business relationships.

E.3 Just and fair relocation policy implementation

The Company uses relocation as a matter of last resort, following IFC Performance Standard 5, and applying free, prior, and informed consent when relocation is deemed necessary. The Company tracks the impacts of its relocation policies and practices.

SCORE 1

The Company has a public policy that commits it to follow the substance of IFC Performance Standard 5 when relocation for a project is determined to be necessary **AND** the Company commits to not relocate or displace affected communities without obtaining free, prior, and informed consent (FPIC) and providing just and fair compensation, as agreed during the FPIC and resettlement process with relevant stakeholders. **OR** if the Company does not develop project sites directly, it states that and commits not to engage in projects where developers do not have these commitments in place.

SCORE 2

The Company meets the criteria in SCORE 1 **AND** also publishes statistics regarding the number of people relocated by current and planned projects it is involved in, **AND** publishes regular (at least annually, throughout the life of the project) reviews of living conditions of relocated communities in scenarios where housing or other related compensation agreements were made. **OR** if the Company has not engaged in any projects involving relocations, it describes its approach in relation to all elements above.

Theme F: Security and High-Risk Contexts

F.1 Public reporting on identified security risks and incidents

The Company acknowledges the increased risks associated with operating in or sourcing materials from conflict-affected and high-risk areas, and reports on any identified risks in its own operations or business relationships in these contexts.

SCORE 1

The Company explicitly commits to address the heightened human rights risks associated with operations in conflict-affected and/or high-risk areas. **AND** The Company outlines the steps it takes to assess and mitigate these risks (or references where this information can be found in the Company's human rights due diligence policy).

SCORE 2

The Company meets the criteria in SCORE 1 **AND** regularly (at least annually) reports on security incidents identified and measures taken to address them both in its own operations and those of relevant suppliers, contractors, subcontractors, and other business relationships. **OR** If no security incidents were identified in the annual reporting period, the Company reports that.

F.2 Evidence of security provider human rights assessments

The Company discloses information about the implementation of its risk assessment processes with regards to the use of security forces and integrates a commitment to only engaging with private security forces that are held to international standards.

SCORE 1

The Company regularly (at least annually) conducts and publicly reports on the outcomes of its risk assessment process with regards to the use of security forces, referencing how its process aligns with human rights.

SCORE 2

The Company commits to adhere to the Voluntary Principles on Security and Human Rights **AND** if the Company uses private security forces, it discloses that and commits to only contract companies that are signatories to the International Code of Conduct for Private Security Providers. If the Company directly employs its security forces, it commits to abiding by the International Code of Conduct itself.

F.3 Risk identification and mitigation in minerals supply chains

The Company actively identifies and assesses human rights risks and impacts in its minerals supply chains in line with the OECD Guidance on Responsible Mineral Sourcing or equivalent international standards and the Company takes action to mitigate or prevent identified risks in its mineral supply.

SCORE 1

The Company publicly describes its processes for implementing the OECD Guidance on Responsible Mineral Sourcing or equivalent international standards, including Step 5 which mandates an annual public report on risk identification and mitigation. If the Company does not produce renewable energy technology using minerals, it requires any relevant technology providers, including battery storage providers, to do the above.

SCORE 2

The Company meets the criteria in SCORE 1 **AND** the Company's Step 5 report describes in detail at least one risk that was identified in its minerals supply chains and how that risk was mitigated (or what future plans for mitigating it are). **OR** If the Company identified no risks in the annual reporting period the Step 5 report notes that. If the Company does not produce renewable energy technology using minerals, it requires all relevant technology providers, including battery storage providers, to do the above.

Theme G. Protection of Human Rights and Environmental Defenders

I G.1 Commitment to respect the rights of human rights and environmental defenders

The Company commits to non-retaliation against human rights and environmental defenders, and explicitly supports their rights.

SCORE 1

The Company publicly commits to not retaliate against human rights or environmental defenders exercising their fundamental rights to freedom of expression, association, peaceful assembly, or protest, whether directly against the Company and its operations or not, and regardless of whether they are workers or community members affected by the Company's operations, including journalists and local NGO members. **AND** The Company extends this expectation to all relevant suppliers, contractors, subcontractors, and other business relationships.

SCORE 2

The Company describes how this commitment is applied in practice (e.g. including in its due diligence process, doing analysis of civil society space in countries of operation, or continuous monitoring of risks to and attacks on defenders), and how it uses its leverage to mitigate these risks.

Theme H. Labour, Health, and Safety

NOTE: Protection of all fundamental labour rights are covered under Core UNGP indicator A.1.2 (this includes: freedom of association and collective bargaining, elimination of forced labour, abolition of child labour, and elimination of discrimination). The indicators below aim to complement these with more specific performance proxies.

I H.1 Health and safety statistics disclosure

The Company discloses key data regarding its health and safety performance.

SCORE 1

The Company discloses quantitative information on health and safety for its employees related to injury rates or lost days (or near miss frequency rate) and fatalities. **AND** The Company extends this expectation to all relevant suppliers, contractors, subcontractors, and other business relationships

SCORE 2

The Company explains any significant incidents or adverse trends from the disclosures in SCORE 1 **AND** the Company has a procedure to review suppliers' safety statistics during pre-qualification, including disqualifying suppliers if they do not meet pre-established standards.

I H.2 Living wage

The Company commits to paying all its employees a living wage and extends this requirement to all relevant business partners.

SCORE 1

The Company has a policy committing it to pay all its employees a living wage and discloses how it calculates this wage, including if and how it engages relevant trade unions or equivalent worker bodies in the setting of the wage rate.

SCORE 2

The Company's policy extends this expectation to all relevant suppliers, contractors, subcontractors, and other business relationships.

I H.3 Gender wage gap reporting

The Company provides gender wage gap information and extends this requirement to all relevant business partners.

SCORE 1

The Company demonstrates that it has already closed the gender wage gap **OR** that it has a timebound commitment for closing the gender wage gap. **AND** The Company reports gender wage gap information at the company level across multiple pay bands.

SCORE 2

The Company extends this expectation to all relevant suppliers, contractors, subcontractors, and other business relationships.

Theme I. Right to a Healthy and Clean Environment

I.1 Environmental impact assessment and remediation

The Company conducts and publishes environmental impact assessments for all its renewable energy projects, including specific information on potential harms and plans for mitigation.

SCORE 1

The Company undertakes public environmental impact assessments for all its renewable energy projects **OR** commits to only participating in projects where a public environmental impact assessment is undertaken. The assessments comply with the principles settled by the Espoo Convention and/or the EU Environmental Impact Assessment Directive and include all of the following: a) timely consultations with affected communities, b) activities in protected areas c) environmental impacts affecting communities (such as access to clean water, impacts on soil), d) impacts on biodiversity, flora and forestry, or natural habitats (in compliance with the Convention on Biological Diversity and other relevant instruments), e) impacts on climate change, and f) plans for restoring the impacted environment, including through compensation measures, during and upon closure of the project.

SCORE 2

The Company meets the criteria in SCORE 1 **AND** the Company reports on its compliance with government-mandated remediation fund requirements **OR** where it is not mandated by government, the Company reports on how it ensures there is an entity (either the Company itself, a bank, or an insurance company) to guarantee the payment for environmental restoration or compensations to people who may suffer from Company operations.

I.2 Life cycle assessment

The Company analyses and reports on and the life cycle assessments of the primary technologies it uses, including raw materials sourcing and waste generation as per ISO 14040.

SCORE 1

The Company undertakes or requires its technology suppliers to undertake regular public life cycle assessments of its primary technologies such as solar panels or wind turbines as per ISO 14040. The life cycle assessment extends to risks related to raw material sourcing and waste generation, including minerals and metals.

SCORE 2

The Company meets the criteria in SCORE 1 **AND** has action plans in place to address potential adverse impacts identified during life cycle assessments **AND** the Company demonstrates and continually reports (at least annually) on progress made on the action plan.

I.3 Energy portfolio aligned with just energy transition

The Company demonstrates commitment to a just transition to fully renewable energy operations.

SCORE 1

The Company has a timebound plan in place for a just energy transition out of non-renewable energy production, if not reached already **AND** the Company regularly (at least annually) reports on progress against this plan.

SCORE 2

The Company's energy production portfolio is 100% renewable energy.

NOTE: See the [Context](#) section of this methodology document for further discussion on why a transition to a low-carbon economy is fundamental to human rights and the [Company Selection](#) section for an explanation of which subsectors we include in our definition of renewable energy.

Theme J. Transparency and Anti-Corruption

J.1 Anti-corruption due diligence and reporting

The Company adopts internationally recognized standards for prohibiting and addressing bribery and corruption, and reports on alleged instances of corruption as part of its reporting on grievance mechanism use and implementation.

SCORE 1

The Company commits to the principles outlined in the OECD Convention on Combatting Bribery of Foreign Public Officials in International Business Transactions including, at a minimum, prohibiting bribes to foreign public officials. **AND** The Company extends this expectation to all relevant suppliers, contractors, subcontractors, and other business relationships.

SCORE 2

The Company reports information regarding any corruption or bribery complaints or concerns received via its grievance mechanism/channels for external individuals and communities (see C.2). **OR** If no corruption reports were made on this platform the Company notes that.

J.2 Payments to governments and beneficial ownership disclosure

The Company discloses government payment information and requires beneficial ownership disclosure for its renewable energy operations.

SCORE 1

The Company discloses any payments made to governments for purchase or rent of land or natural resources related to its renewable energy projects **AND** discloses the terms under which those payments were made. **OR** If the Company is not involved in direct purchase or rent of land or natural resources, it expects its relevant suppliers, contractors, subcontractors, and other business relationships to disclose this information.

SCORE 2

The Company meets the criteria in SCORE 1 **AND** the Company includes this disclosure as a precondition requirement for conducting business with all relevant suppliers, contractors, subcontractors, and other business relationships involved in renewable energy operations.

Theme K. Equality and Inclusion

K.1 Equality training for management and employees

The Company conducts regular equality training for both management and staff and extends this expectation to relevant business partners.

SCORE 1

The Company provides mandatory and regular (at least annual) in person, virtual, and/or written training, as per ILO Convention 190, to its staff on all types of contracts on equality, equity, diversity, anti-discrimination (including gender-based violence), and the Company's policies and mechanisms for addressing it.

SCORE 2

The Company meets the criteria in SCORE 1 **AND** the Company incentivizes its suppliers to do the same by providing materials and access to relevant resources for those who will be conducting trainings.

K.2 Gender balance

The Company commits to and demonstrates progress towards gender balance.

SCORE 1

The Company commits to and has a public, timebound action plan to create gender balance at all company levels, **AND** demonstrates progress against it through regular (at least annual) reporting.

SCORE 2

The Company meets the criteria in SCORE 1 **AND** discloses information that shows no single gender makes up more than 60% of the Company's board of directors, executives, or executive board.



Business & Human Rights Resource Centre

December 2019

Business & Human Rights Resource Centre is an international NGO that tracks the human rights impacts (positive and negative) of over 9,500 companies in over 180 countries making information available on its eight-language website. We seek responses from companies when concerns are raised by civil society. The response rate is 75% globally.

The authors of this methodology document would like to thank the wide group of people who made this project possible, including the Global Team at the Business & Human Rights Resource Centre.

Special thanks to expert contributions from our advisory committee members and consultation attendees.

This project was made possible thanks to funding from
Omidyar Network and **Wallace Global Fund**.



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