ReNew

Human Rights Due Diligence (HRDD) Report

FY 2025-26

ReNew

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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** has since been completed, comprising independent third-party physical assessments at nine operational sites spanning manufacturing, solar, wind, hydro and RenServ operations, and structured virtual assessments of critical Tier-I suppliers. Across the two phases, fifteen operational sites and eighty four critical Tier-I suppliers across India, China and Vietnam have been covered.

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, human trafficking, freedom of association 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 prioritised 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 institutionalised, 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 634,824 hours of safety and human rights training. Approximately 100% 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. Although all 84 critical Tier-I suppliers were assessed as low to medium risk, each supplier received tailored recommendations to further strengthen responsible business practices and alignment with ReNew's ethical and operational standards. Suppliers acknowledged the findings and committed to implementing the recommended improvement actions within agreed timelines, with the majority of actions targeted for completion within mutually agreed timelines. 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.

Within its own operations, the physical verification carried out under Phase II confirmed that the most severe categories of human rights harm - child labour, forced labour, restrictions on freedom of association and discrimination were not identified at any site assessed. Two areas were identified for strengthening: **the consistent availability of menstrual hygiene provisions, including sanitary napkins,** at certain sites; and **awareness of the grievance mechanism,** where limited understanding of grievance categories and scope to strengthen shop-floor grievance redressal were observed. Both are being addressed through defined corrective actions.

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 ~20 GW (as of March 31, 2026) on a gross basis, ReNew operates globally and is 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. Accordingly, ReNew's human rights approach addresses a broad range of issues, including the prevention of child labour, forced labour, modern slavery and human trafficking, discrimination, and harassment; the promotion of diversity, equity, and inclusion; fair remuneration; safe and healthy working conditions; education and skills development; freedom of association; the rights of migrant workers; community and land rights; indigenous peoples' rights; security-related issues; and employee well-being through initiatives such as flexible working arrangements, part-time working options (on a case to case basis) and health and nutrition programs.

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 recognised 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, 3% contractors and Tier I suppliers. A total of 84 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.

Across the two phases, fifteen operational sites have been covered - nine assessed physically during Phase II (Jaipur and Dholera manufacturing, Rudraprayag hydro, Jaisalmer, Barmer and Solapur solar, Solapur and Kurudagi wind, and Jath Renserve) and six assessed virtually during Phase I. All critical Tier-I supplier engagements, across India, China and Vietnam, were conducted virtually.

In FY 2023-24, ReNew conducted its first Double Materiality Assessment (DMA), which enabled us to prioritise 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 500 responses to customised 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. In FY 2025-26, the scope of assessment was also expanded to include Tier 2 suppliers, enabling a deeper evaluation of risks and practices across the supply chain. 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 Traceability and Forced Labour Guidelines to enhance transparency and ethical sourcing, achieving full traceability for solar wafers and over 100% 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 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 and CHRO, along with 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, health and safety, and freedom of association. Responses were collected and analysed, 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 recognised 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 labourers, 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 analysed 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 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 summarise key findings, risk hotspots, and recommended actions. This report served as the 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 has been completed and focused on physical verification of the findings and recommendations identified during the desk-based assessment in Phase I. This phase involved on-site visits to nine operational locations 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 review, the team evaluated the effectiveness of existing controls and identified discrepancies between reported practices and ground realities. Focused group discussions were held with migrant workers, on-roll and contract workers (male and female), workers in hazardous areas, security personnel, land givers and members of neighbouring communities. For suppliers, ReNew carried out virtual assessments of critical Tier-I suppliers, comprising structured questionnaires, documentary evidence review and live interviews with Human Resources, EHS, Compliance and Community Relations representatives. The insights gathered during Phase II have been used to refine mitigation strategies, strengthen governance mechanisms and ensure that ReNew's human rights commitments are upheld in practice, supporting a more robust and evidence-based remediation framework, 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, human trafficking 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 centralised 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. Physical verification during Phase II confirmed that no person below the statutory working age was employed at any of the sites assessed. During Sustainable

Supply Chain engagement, it was observed that critical suppliers had aligned their practices with legal standards prohibiting child labour.

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 behaviour is met with disciplinary action. These practices are comprehensively documented in ReNew's BRSR and are fully aligned with the GRI standards. Phase II consultations identified no material incidents of prohibited discrimination across the sites assessed. 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 marginalised 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 recognised 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; Phase II engagements indicated limited female representation across several suppliers, largely concentrated in support rather than technical or leadership roles, and suppliers have been encouraged to set time-bound gender targets.

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 2025-26, ReNew collaborated with the British Safety Council to conduct 57 external audits: 34 at asset management sites and 23 at EPC sites. Extensive safety training programs are implemented, with a total of 634,824 hours of safety training delivered to employees and workers in FY 2025-26. 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. Phase II physical verification confirmed that foundational occupational safety measures are in place at the sites assessed. It was observed that awareness of the general grievance mechanism was limited among workers at the shop-floor level, with a tendency to treat all workplace concerns as POSH matters, indicating a limited understanding of grievance categories and scope to strengthen grievance redressal at the shop floor. A structured, multilingual awareness programme clearly distinguishing the general grievance mechanism from the POSH mechanism, together with a unified and QR-enabled reporting channel accessible to all worker categories, has been recommended and is being implemented. Suppliers reported that fair and safe working conditions are maintained; occupational health and safety infrastructure emerged as the most systemic supplier theme, particularly on-site medical capacity, certified first-aiders, ambulance access and safety-audit cadence.

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. In FY 2025-26, a total of 174,549 hours of training was delivered to 3,710 participants. 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; and suppliers have been advised to strengthen awareness training including formal career-progression pathways and to initiate human rights due diligence for their own operations.

f. Fair Remuneration

ReNew ensures transparent and equitable compensation practices across its workforce. All employees and workers receive clear, itemised payslips detailing wages, statutory deductions, and benefits. The company is committed to equal remuneration for all, regardless of gender, and actively works to minimise 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, Modern Slavery and Human Trafficking

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 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 labour laws, including the Labour Law and Labour Contract Law, and explicitly prohibit forced labour. ReNew recognises human trafficking and modern slavery as salient human rights risks, particularly in relation to contract and migrant workers engaged through third-party agencies, and in upstream

segments of the solar PV value chain. ReNew's Human Rights Policy, Code of Business Conduct and Ethics and Supplier Code of Conduct prohibit all forms of forced, bonded or compulsory labour, human trafficking and modern slavery, in line with the UN Guiding Principles on Business and Human Rights and UNGC Principle 4.

Phase II physical verification, including dedicated consultations with migrant worker groups, identified no indicators of forced, bonded or compulsory labour or human trafficking at the sites assessed. For suppliers, third-party verified polysilicon-to-module traceability and diversification of sourcing from higher-risk regions have been recommended.

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 unionised, 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. Phase II consultations identified no restrictions or reprisals at the sites assessed, and suppliers were found to comply with applicable labour laws.

i. Rights of Migrant Workers

At present, ReNew does not directly employ migrant workers. However, the company ensures that contractors who engage migrant labourers uphold their rights and comply with relevant labour laws. ReNew maintains oversight of contractor practices, and dedicated consultations with migrant worker groups, along with inspection of contractor-managed facilities, were completed as part of Phase II. The suppliers have policies in place to protect the rights of migrant workers.

j. Health & Nutrition

ReNew prioritises 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. Phase II identified that menstrual hygiene provisions, including the consistent availability of sanitary napkins, were not in place at certain sites. Sanitary napkin vending and disposal facilities, supported by defined replenishment and periodic verification protocols, are being provided across sites as a priority corrective action. Suppliers reported that new and departing employees undergo physical examinations, and first-aid kits are available on-site; gaps relating to occupational health centres, health insurance and availability of female medical staff were noted during Phase II which were communicated to the suppliers.

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 minimise negative impacts and ensure fair compensation and support. No adverse impacts on indigenous or tribal communities were identified at any of the sites assessed during Phase II.

l. Community Issues

ReNew actively engages with local communities to promote sustainable development and minimise 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; they have been encouraged to strengthen community programming addressing health, education, skilling and rights awareness.

m. Land Rights

ReNew's approach to ethical land practices includes the assessment and management of land-related risks, concerns, and stakeholder impacts through established due diligence processes.ReNew adopts a proactive approach to land stewardship by engaging with stakeholders, assessing land-related considerations, and addressing matters through established governance and engagement mechanisms..

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. No incidents involving supplier security personnel were flagged during Phase II.

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 and suppliers where risks have been identified across Phase I and Phase II are as follows:

- Own operations: 10%
- Critical suppliers: 64% of the suppliers assessed have been identified with some form of human rights risk

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. The comprehensive third-party assessment has since been completed in Phase II, comprising physical verification at nine operational sites and structured virtual engagements with critical Tier-I suppliers. Every supplier assessed has received a tailored set of recommendations.

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. Phase II physical verification confirmed that no person below the statutory age was employed at any site assessed.	Robust policy and systems in place, no remediation needed. Verified through on-site assessment in Phase II; periodic age-verification audits to continue.	No violations were identified during the Phase II supplier assessments.	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 child labour is employed by them. To meet the requirements of ReNew's contract documents, suppliers have implemented induction cards issued to contractors and workers which include their age details for transparency.
Discrimination	Comprehensive anti-discrimination policies, grievance mechanisms, and POSH policy in place. No material incidents of discrimination were identified during Phase II consultations.	-	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.

Key Human Rights Issue	Impact & Risk Overview: Own Operations	Mitigation Actions / Recommendations	Impact & Risk Overview: Suppliers	Mitigation Actions / Recommendations
				Implementation was verified in Phase II through a third-party assessment; parity in medical-examination policies has been recommended.
Diversity and Inclusivity	Inclusive recruitment, accessible infrastructure, and third-party audited DEI data in place.	-	Suppliers claimed DEI compliance. Phase II highlighted opportunities to further enhance gender diversity for a few suppliers.	Suppliers were recommended to set quantifiable targets to be achieved in short, medium and long term.
Fair and Safe Working Conditions	Extensive safety training and certification programs, and grievance registers in place. Phase II physical verification confirmed that foundational occupational safety systems are in place at the sites assessed. Discussions highlighted opportunities to further strengthen communication and awareness of grievance channels available, supporting	Continue to strengthen awareness of available grievance channels through periodic multilingual communications and refresher sessions, streamline reporting and resolution processes, including accessible digital channels and resolution pathways for all worker categories.	Suppliers reported fair conditions. Phase II highlighted opportunities to further strengthen occupational health and safety infrastructure across a few suppliers	Suppliers were recommended to conduct safety audits. Suppliers were encouraged to strengthen access to medical support services, trained first-aid resources, and emergency response arrangements, .

Key Human Rights Issue	Impact & Risk Overview: Own Operations	Mitigation Actions / Recommendations	Impact & Risk Overview: Suppliers	Mitigation Actions / Recommendations
	effective access to existing redressal mechanisms.			
Education, Skills, Development, Training	Structured training programs covering safety and technical skills; dedicated training wing.	-	Training claimed by suppliers. Phase II identified opportunities to enhance communication around grievance mechanisms and career growth initiatives at a few supplier locations.	A few suppliers were encouraged to further build on existing people practices by increasing awareness of grievance mechanisms and exploring structured approaches to employee development, including learning and career progression opportunities.
Fair Remuneration	Transparent, equitable pay reported in accordance with statutory requirements.	Continued benchmarking will help maintain competitiveness and fairness.	Suppliers reported compliance. Phase II observed varying approaches to employee welfare benefits for a few suppliers, presenting opportunities for greater alignment with evolving workforce well-being practices.	Recommendations also included exploring opportunities to further enhance employee welfare provisions through greater standardisation of key workforce benefits, including health coverage and employee support measures.
Forced Labour, Modern Slavery and Human Trafficking	Zero tolerance embedded in contracts and policies. No indicators of human	Continued oversight of contractor recruitment and migrant worker practices; grievance channels extended	Suppliers affirmed compliance. no specific evidence of forced labour	Third-party verified polysilicon-to-module traceability and diversification of sourcing from higher-risk regions

Key Human Rights Issue	Impact & Risk Overview: Own Operations	Mitigation Actions / Recommendations	Impact & Risk Overview: Suppliers	Mitigation Actions / Recommendations
	trafficking were identified during Phase II consultations, including with migrant worker groups.	to contract and migrant workers.	was identified during the Phase II engagements.	have been recommended.
Freedom of Association & Right to Collective Bargaining	Respects employee rights; no unions currently but open to engaging in collective bargaining. No restrictions or reprisals were reported during Phase II consultations.	Continue to strengthen employee engagement and participation through structured dialogue and feedback mechanisms, including employee forums, feedback channels, and regular communication platforms.	Suppliers complied with labour laws.	Suppliers were recommended to encourage transparent worker representation mechanisms.
Rights of Migrant Workers	Not applicable - ReNew does not directly employ migrant workers; contractor practices are overseen. Dedicated consultations with migrant worker groups were completed during Phase II.	-	Suppliers have policies. Relocation support mechanisms were in place, with opportunities to further enhance employee support arrangements during relocation.	Suppliers were suggested to ensure policies are documented and inclusive. Provision of interim accommodation for relocated workers has been recommended.
Health & Nutrition	Regular health check-ups, hygienic canteens, and nutrition standards. Phase II noted opportunities to	Explore opportunities to strengthen menstrual hygiene infrastructure at applicable sites through appropriate facilities, awareness	Suppliers have proper health infrastructure. Health and welfare measures were generally in place, a few	Suppliers were recommended to develop robust occupational health infrastructure and conduct periodic health assessments.

Key Human Rights Issue	Impact & Risk Overview: Own Operations	Mitigation Actions / Recommendations	Impact & Risk Overview: Suppliers	Mitigation Actions / Recommendations
	further strengthen employee wellbeing initiatives at certain sites, including the provision of menstrual hygiene resources and support measures.	measures, and regular maintenance and replenishment practices.	suppliers had opportunities to further strengthen occupational health and employee wellbeing provisions.	
Indigenous People Issues	Ethical land acquisition and mitigation measures. No adverse impacts on indigenous or tribal communities were identified during Phase II.	Continue to integrate indigenous and tribal community considerations and stakeholder engagement, where relevant.	Limited direct impact on suppliers.	-
Community Issues	Active local engagement.	-	Proper mechanism to engage with communities in place. Phase II highlighted opportunities for a few suppliers to further strengthen community engagement practices through formalised feedback mechanisms and structured community development initiatives.	. Establishment of multilingual community grievance mechanisms with defined escalation timelines has also been recommended.

Key Human Rights Issue	Impact & Risk Overview: Own Operations	Mitigation Actions / Recommendations	Impact & Risk Overview: Suppliers	Mitigation Actions / Recommendations
Land Rights	Fair compensation provided, above mandates; ongoing land disputes.	Maintain ongoing engagement with local communities and relevant stakeholders through established consultation and feedback processes.	Limited direct impact on suppliers.	-
Security	Regular monitoring by security personnel.	-	Limited direct impact on suppliers. No supplier security incidents were flagged during Phase II.	-

Mitigation and Remediation Measures

a. Coverage of Mitigation Actions Across Operational Layers

The consolidated human rights assessment disclosure below summarises the proportion of the value chain assessed, the proportion where human rights risks were identified, and the proportion where mitigation actions have been taken.

Category	A. % of total assessed in the last three years	B. % of assessed (Column A) where risks have been identified	C. % of risks (Column B) with mitigation actions taken
Own Operations	100%	10%	100%
Contractors and Tier-I Suppliers	3% of the total supplier base, including 100% of critical suppliers	64%	100%
Joint Ventures	Not Applicable	Not Applicable	Not Applicable

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 recognise 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. Following Phase II, these channels are being extended explicitly to contract, migrant and community stakeholders, and targeted awareness campaigns are clarifying the distinction between the general grievance mechanism and the POSH mechanism, with dedicated focus on shop-floor redressal.

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 **including menstrual hygiene and sanitary napkin provisions,** 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: 15 sites (100% of the sites where risks were identified)
- Contractors & Tier I Suppliers: 54 suppliers (100% of the critical suppliers assessed)

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.

Within own operations, remediation has focused on the two areas identified during physical verification: the provision of menstrual hygiene facilities, including sanitary napkin vending and disposal at the sites concerned; and the strengthening of grievance awareness and shop-floor redressal through multilingual communication, clear differentiation of grievance categories from POSH matters, and accessible reporting channels for all worker categories.

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, a wide range of remediation actions are in the process of implementation at the supplier's end. Some of these include (but are not limited to) development of policy commitments around human rights, setting quantifiable targets, conducting human rights training and HRDD. Following Phase II, **these also include strengthening occupational health infrastructure, establishing grievance and incident-reporting mechanisms, setting diversity targets, creating career-progression pathways, and strengthening community engagement and upstream traceability.** 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. The assessment highlighted opportunities for suppliers to further strengthen and formalise certain management practices across areas such as human rights governance, risk assessment processes, health and safety management, workforce awareness and training, supply chain traceability, and diversity and inclusion. Tailored recommendations were provided to support the continued enhancement of policies, procedures, monitoring mechanisms, targets, and capacity-building initiatives. Suppliers responded positively to the findings and expressed their commitment to progressively strengthening these practices within realistic and mutually agreed timelines.

Insights from Phase I informed the design of Phase II, which has now been completed and has deepened 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. With Phase II now complete, ReNew has moved from a desk-based understanding of its human rights risk profile to an evidence-based, verified view of implementation across its operational sites and critical Tier-I suppliers. The priority ahead is to close the corrective actions arising from Phase II and to extend the assessment to more operational sites and suppliers, including selected sub-tier vendors in higher-risk segments of the solar value chain. Site-level and supplier-level mitigation plans will be tracked to completion through management dashboards, with evidence of closure verified through follow-up engagement and, for higher-risk suppliers, progressive on-site verification.

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 recognised 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 Recognised Human Rights	Affected Stakeholders	Most Vulnerable Groups
Child Labour	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
Discrimination	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)
Diversity and Inclusivity	Right to equality and non-discrimination (UDHR art 2) / UNGC Principle 6	Operations (employees)	Women, minorities, persons with disabilities
Fair and Safe Working Conditions	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
Education, Skills,	Right to education (UDHR art 26) / Right to work (UDHR art 23.1) / UNGC Principle 1	Operations / Other activities	Young workers, women, economically

Key Human Rights Issue	Internationally Recognised Human Rights	Affected Stakeholders	Most Vulnerable Groups
Development, Training		(employees, trainees)	disadvantaged groups
Fair Remuneration	Equal pay for equal work (UDHR art 23.2) / Right to just and favorable working conditions (UDHR art 23.1) / UNGC Principle 1	Operations / Supply chain (Employees/workers)	Women, minorities, persons with disabilities, migrant workers, contract laborers
Forced Labour, Modern Slavery and Human Trafficking	Right not to be subjected to slavery, servitude or forced labor (UDHR art 4 and 5) / Freedom of movement (UDHR art 13) / Protection against trafficking in persons (UN Palermo Protocol) / ILO Forced Labour Convention (C029) and Protocol (P029) / UNGC Principle 4	Operations / Supply chain / Other activities (Employees/workers)	Migrant and temporary employees/workers, contract workers engaged through third-party agencies
Freedom of Association & Right to Collective Bargaining	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)
Rights of Migrant Workers	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
Health & Nutrition	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
Indigenous People Issues	Rights of minorities (ICCPR art 27) / Right to culture and land (UNDRIP) / UNGC Principle 1	Community engagement / Land use activities	Indigenous peoples, tribal communities
Community Issues	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 marginalised communities, rural populations
Land Rights	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

Key Human Rights Issue	Internationally Recognised Human Rights	Affected Stakeholders	Most Vulnerable Groups
Security	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