



## RENEW ENERGY GLOBAL PLC

### POLICIES AND PROCEDURES FOR COMPLAINTS REGARDING ACCOUNTING, INTERNAL ACCOUNTING CONTROLS, FRAUD OR AUDITING MATTERS

(Effective from August 23, 2021)

#### I. INTRODUCTION

ReNew Global Energy plc (the “*Company*”), is committed to full and accurate financial disclosure and to maintaining its books and records in Designated with all applicable laws, rules and regulations. The Company wishes to encourage employees, independent contractors, third-party vendors, customers and business partners to make the Company aware of any practices, procedures or circumstances that raise concerns about the integrity of its financial disclosures, books and records. The following policies and procedures (this “*Policy*”) have been adopted by the Audit Committee (the “*Audit Committee*”) of the Board of Directors of the Company to govern the receipt, retention and treatment of complaints regarding the Company and its subsidiaries (Collectively the Company) accounting, internal accounting controls or auditing matters, and to protect the confidential, anonymous reporting of employee concerns regarding questionable accounting or auditing matters.

All employees and third parties making reports are asked to provide as much detail and supporting information as possible about their concerns in order to assist the investigative process. It is the policy of the Company to treat complaints about accounting, internal accounting controls, auditing matters or questionable financial practices (the “*Accounting Complaints*”) seriously and expeditiously.

Employees will be made aware of the procedures contained herein and will be given the opportunity to submit for review by the Company confidential and anonymous Accounting Complaints regarding the following matters. The following is not an exhaustive list, and Accounting Complaints regarding matters not listed here may be submitted as well.

- Fraud against investors, securities fraud, mail or wire fraud, bank fraud or fraudulent statements made to the U.S. Securities and Exchange Commission (the “*SEC*”) or the investing public.
- Violations of SEC rules and regulations or any other laws applicable to the Company’s financial accounting, maintenance of financial books and records, internal accounting controls and financial statement reviews or audits.
- Fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company.
- Significant deficiencies in or intentional non compliance with the Company’s internal accounting controls.

- Misrepresentations or false statements regarding a matter contained in the financial records, financial reports or audit reports of the Company.
- Deviation from the full and fair reporting of the Company’s financial condition.

If requested by the employee, the Company will protect the confidentiality and anonymity of the employee to the fullest extent possible, consistent with the need to conduct an adequate review. Independent contractors, vendors, customers, business partners and other parties external to the Company will also be given the opportunity to submit Accounting Complaints; however, the Company is not obligated to keep Accounting Complaints from non-employees confidential or to maintain the anonymity of non-employees.

Accounting Complaints will be reviewed by the Company’s Chief Financial Officer (CFO) or such other persons as the Audit Committee determines to be appropriate (the “*Designated Officer*”), under the Audit Committee’s direction and oversight. In the event that the Company contracts with a third party to handle complaints or any part of the complaint process, the third party will comply with these policies and procedures. The Company will abide by all laws that prohibit retaliation against employees who lawfully submit complaints under these procedures.

## II. PROCEDURES

The Company urges any person desiring to make an Accounting Complaint to contact the CFO or Designated Officer directly. For persons who wish to make an Accounting Complaint but do not wish to contact the CFO or Designated Officer directly, the Company has established alternative procedures to report an Accounting Complaint anonymously. Any person who desires to report an Accounting Complaint has three options for doing so (and may elect to use any of them).

### A. Receipt of Accounting Complaints

#### 1. *Ethics Hotline*

Any person with an Accounting Complaint can contact the Ethics Hotline, which the Company has established and which is available 24 hours a day, 7 days a week, by telephone at 18008890242 or email at [whistleblower@renewpower.uk](mailto:whistleblower@renewpower.uk) to submit his or her Accounting Complaint. Employees who contact the Ethics Hotline may submit their complaint confidentially or anonymously and need not provide their name or other personal information. If such information is provided, reasonable efforts will be used to conduct the investigation that follows from any employee call in a manner that protects the confidentiality and anonymity of the employee making the call. The intake information may be received by a third-party contractor specifically engaged to provide the hotline services or an internal person specifically designated to receive hotline calls. Among other things, the following information may be requested by the person receiving the complaint:

- if the reporting person is an employee, the business function in which such person works and, if the reporting person is a non-employee, where such person is employed or such person's relationship to the Company;
- any relevant information concerning the allegations; and
- the name of the reporting person (unless an employee decides to remain anonymous).

The information from the Ethics Hotline will be documented in a format acceptable to the Company and shall include at a minimum a written description of the information received concerning the Accounting Complaint allegations and shall be provided to the CFO or Designated Officer.

## 2. *Written Complaints to Audit Committee*

Any person with an Accounting Complaint can report to the Chairman of Audit Committee openly, confidentially or anonymously. Fraud and accounting allegations can be made orally or in writing to the Chairman of the Audit Committee.

Employees submitting this information need not provide their name or other personal information. If such information is provided, reasonable efforts will be used to conduct the investigation that follows from any employee who reports an Accounting Complaint in accordance with the procedures set forth herein in a manner that protects the confidentiality and anonymity of the employee submitting the Accounting Complaint. Accounting Complaints to the Chairman of Audit Committee can be submitted in writing and should be marked CONFIDENTIAL and mailed to the following address:

ReNew Energy Global plc  
[manoj@manojpsingh.com](mailto:manoj@manojpsingh.com)  
Attention: Chairman of Audit Committee

## 3. *Written Complaints to CFO or Designated Officer*

Any person may submit a written Accounting Complaint to the CFO or Designated Officer at the following address:

ReNew Energy Global plc  
[whistleblower@renewpower.uk](mailto:whistleblower@renewpower.uk)  
Attention: Chief Financial Officer or Designated Officer

Employees submitting this information need not provide their name or other personal information. If such information is provided, reasonable efforts will be used to conduct the investigation that follows from an Accounting Complaint from an employee in a manner that protects the confidentiality and anonymity of the employee submitting the Accounting Complaint.

B. Treatment of Accounting Complaints

1. Any Accounting Complaint made to the Chairperson of Audit Committee shall be disposed of as he/she may deem fit.
2. Any Complaint made to the CFO or Designated Officer, as applicable, shall be reviewed by the CFO or Designated Officer, and they or he or she may investigate it himself or herself or themselves or may assign another employee, outside counsel, advisor, expert or third-party service provider to investigate or assist in investigating the Accounting Complaint. Investigating Officer shall report his or her findings or recommendations or disciplinary or corrective action to the CFO or Designated Officer, as applicable.
3. The CFO or Designated Officer, as applicable, may direct Investigating Officer to work at the direction of or in conjunction with the Company's legal department, outside legal counsel or any other attorney, as applicable, in the course of the investigation.
4. If determined to be necessary by the CFO or Designated Officer, as applicable, the Company shall provide for appropriate funding, as determined by the CFO or Designated Officer, as applicable, to obtain and pay for additional resources that may be necessary to conduct the investigation, including without limitation, retaining outside counsel and/or expert witnesses.

C. Reporting

At least once per calendar quarter and whenever else as deemed necessary, a report shall be presented to the Audit Committee that summarizes each Accounting Complaint made within the last 12 months and shows specifically: (a) the complainant (unless anonymous, in which case the report will so indicate), (b) a description of the substance of the Accounting Complaint, (c) the status of the investigation, (d) any conclusions reached by the investigator and (e) findings and recommendations.

D. Access to Reports and Records and Disclosure of Investigation Results

All reports and records associated with Accounting Complaints are considered confidential information and access will be restricted to the CFO or Designated Officer (and/or any person assigned to investigate the complaint on his or her behalf), Chairman of the Audit Committee, the Company's legal department (if applicable), concerned employees of the Company and outside legal counsel involved in investigating an Accounting Complaint, as contemplated by these procedures. Access to reports and records may be granted to other parties at the discretion of the Audit Committee.

Accounting Complaints and any resulting investigations, reports or resulting actions will generally not be disclosed to the public except as required by any legal requirements or regulations or by any corporate policy in place at the time.

E. Retention of Records

All Accounting Complaints and documents relating to such Accounting Complaints made through the procedures outlined above shall be retained for at least five years from the date of the complaint, after which the information may be destroyed unless the information may be relevant to any pending or potential litigation, inquiry or investigation at such time, in which case the information may not be destroyed and must be retained for the duration of that litigation, inquiry or investigation and thereafter as necessary.

F. Designated with Law

This Policy is intended to meet the requirements of Rule 10A-3(b)(3) under the U.S. Securities Exchange Act of 1934, as amended.

G. Review

This Policy will be subject to the periodic review of the Audit Committee. Any proposed changes to this Policy will be, upon recommendation of the Audit Committee, reviewed and approved by the Board.

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