

Sustainability Code of Conduct for Suppliers

(Amended on 25th September, 2024)

ReNew Energy Global PLC and its subsidiaries (the “Company” or “ReNew”) continuously strive to enhance net positive impact on the environment and society that it operates in through initiatives around GHG emissions, resource efficiency, greening its operations and building a sustainable supply chain. To integrate Environment, Social, Governance (ESG) concerns within its operations, ReNew works towards aligning itself with global frameworks such as Sustainable Development Goals (SDG), Science Based Targets (SBT), the Ten Principles of United Nations Global Compact (UNGC)¹.

In this context, ReNew has instituted the Sustainability Code of Conduct for Suppliers (the “Code”) which sets the ESG expectations from its suppliers, manufacturers, vendors, service providers, and others who work with ReNew (collectively referred to as “Supplier/(s)”). The Code will serve as a mechanism for ReNew’s suppliers to operate ethically and in compliance with the laws. Further, the Code is aligned with the Ten Principles of the United Nations Global Compact and international best practices.

Suppliers and their personnel are expected to observe and implement the Code across their operations:

- Suppliers using / working across ReNew’s sites and / or facilities will comply with ReNew’s applicable policies and requirements while on-site
- Suppliers will respond to and adhere to any additional requests, in timely manner, for certifications such as ISO 9001 (for quality management systems), 14001 (for environment management systems), ISO 45001 (for occupational health and safety management systems)
- Suppliers are bound to share information with ReNew (if not available in public domain) regarding Supplier’s labour, health and safety, environmental practices, business activities and financial situation. Additional information as requested by ReNew, will also need to be shared.
- Suppliers will also need to cooperate during any audits that may be conducted by ReNew or on its behalf by a third party.
- While ReNew seeks to work with its Suppliers to engage and support them in achieving higher sustainability and ESG standards, it may, post examination and in case of failure to comply with this Code, suspend / terminate its relationship with any Supplier that fails to meet these responsibilities.
- ReNew expects its Suppliers to go beyond their own operations and include these criteria as a part of their supply chain and engage with their sub-suppliers to ensure the ESG risks are identified and appropriately mitigated across the supply chain.

Obey the Law of Land

ReNew expects its Suppliers and their sub-suppliers to maintain complete awareness and fully abide by all the applicable laws and regulations, directive and guidelines and all obligations in any contract that the Supplier has with ReNew. This will be including but not limited to environment, employment labour, health and safety, human rights, and governance.

The Suppliers will be responsible for highlighting and alerting ReNew for any non-compliances, penalties, fines, and warnings that may be received by them from the competent authorities.

Human and Labour Rights

ReNew expects its Suppliers and their sub-suppliers to address impacts on human and labour rights including but not limited to International Bill of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, United Nations Convention on the Rights of the Child and other applicable regulations on modern slavery.

¹ Ten Principles of the United Nations Global Compact are derived from: the Universal Declaration of Human Rights, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

The Suppliers should have written human and labour rights policies and standards.

- **Child Labour:** ReNew expects its Suppliers and their sub-suppliers to ensure that they prohibit the use of child labour in any form across their organization. Suppliers should ensure they prohibit the economic employment of individuals under the age of 18 years or as per local regulations, whichever is higher.
- **Forced Labour, bonded labour and modern slavery:** Suppliers and their sub-suppliers will prohibit use of forced, bonded or involuntary and prison labour in any form across their organization. Suppliers to ensure that its sub-suppliers and workers have legal right to perform work at the Supplier premises. Workers shall enjoy the freedom of movement during the employment and have the freedom to terminate employment after the agreed notice and the Supplier shall not withhold any original documents such as identify, immigration, work permit, personal belongings, financial guarantee, or wages, beyond reasonably necessary for administrative reasons. Suppliers are expected to provide written agreement to its employees describing the worker's terms of employment in a language understood by the worker.
- **Remuneration:** Suppliers and their sub-suppliers comply with all the wage and benefit laws and regulations, applicable laws, and regulations as per the land where they operate, including but not limited to minimum wages, overtime wages, wage deductions, sick leave, piece rates and other elements of compensation. Suppliers should not deduct wages as a disciplinary measure.
- **Working hours:** Suppliers and their sub-suppliers should not allow their employees for working beyond applicable industry standard, collective agreement, or law of land.
- **Health and Safety:** ReNew expects its Suppliers and their sub-suppliers not only to maintain awareness and abide by the applicable health and safety laws where they operate but also ensure safe and healthy working conditions and take necessary measures to protect employees from any work-related hazards and dangers at the workplace. Suppliers should work towards continuously improving working conditions and reducing workplace related risks and hazards.
- **Discrimination and Equal Opportunity:** ReNew expects its Suppliers and their sub-suppliers to treat its employees fairly and take steps to promote diversity and ensure a healthy working environment free from discrimination in hiring, compensation, access to training, promotion, wages, retirement, working conditions, assignments, benefits, and discipline based on personal characteristics including but not limited to ethnic background, race, religion, age, gender, disability, sexual orientation, outlook or social status.
- **Freedom of Association and Collective Bargaining:** Suppliers and their sub-suppliers should allow its employees to associate freely, bargain collectively, and seek representation in accordance with local laws. Suppliers should not discriminate against representatives and employees who choose to affiliate or not to affiliate with the respective associations.
- **Harassment and Abuse:** ReNew expects its Suppliers and their sub-suppliers to treat its employees with respect and dignity. Factories should have a harassment-free workplace, which can take many forms including physical, sexual, verbal, or visual activity that generates an atmosphere that is offensive, aggressive, or threatening.
- **Grievance Redressal:** ReNew expects its Suppliers and their sub-suppliers to ensure that their employees have a proper channel to report grievances to the management maintaining anonymity and confidentiality. The grievance redressal system should include addressing grievances in a timely manner and documenting management's action on grievances.

Conflict Minerals

ReNew expects its Suppliers and their sub-suppliers take steps to ensure complete transparency in terms of the origin of minerals used for production of manufactured goods supplied to ReNew. Its Suppliers should ensure minerals used in production of manufactured goods supplied to ReNew are not sourced from conflict-affected areas and / or support / fund conflicts.

Environment

ReNew expects its Suppliers and their sub-suppliers to conduct their business operations and supply products or offer services to ReNew in a manner that doesn't have significant negative impact on the environment. Suppliers are encouraged to have a formal environment policy document which states their commitment for adherence to relevant local and national law and regulations with regards to preventing pollution, protecting biodiversity, reducing GHG emissions and energy consumption,, efficient use of land and natural resources including avoiding deforestation to the extent possible, water management, handling and management of hazardous and non-hazardous waste, discharges, , noise, transportation of products, wastes and materials, environmental issues management and community consultation, and also a written environmental management plan to identify and minimize the impact of their activities on the environment.

Corporate Governance and Ethics

- **Anti-Corruption:** ReNew expects its Suppliers and their sub-suppliers to comply with anti-corruption laws and regulations, which includes the Indian Prevention of Corruption Act, 1988, and the United States Foreign Corrupt Practices Act, 1977. This would require Suppliers to not engage in any form of corrupt proceedings such as extortion, fraud, or money laundering.
- **No gift policy:** ReNew expects its Suppliers and their sub-suppliers to not offer/accept any form of bribe from anyone in return for any business advantage. The bribe offering may include money, gifts, travel, business, or employment opportunities etc.
- **Integrity:** ReNew expects the implementation and preservation of a culture of honesty to be supervised by its Suppliers. The Suppliers must cultivate a culture of honesty that permeates all facets of the organization and ensure that its vision, mission, and priorities are ethically sound.
- **Conflict of Interest:** ReNew expects its Suppliers and their sub-suppliers to have a process to identify and manage conflicts of interest the directors or key managerial persons may have. They should not engage in any transaction or work with an entity that creates conflict of interest for the business.
- **Data privacy:** ReNew expects its Suppliers to not use any confidential information for activities that are not related to their own business.
- **Compliance with trade laws:** ReNew expects its Suppliers and their sub-suppliers to comply with all relevant trade control laws and regulations relating to the importation, exportation, re- export or transfer of products, services, software, technology, or technical data.
- **Anti-competitiveness:** ReNew expects its suppliers and their sub-suppliers to abstain from any unfair or anti-competitive practices as per the laws applicable.

Management System

In relation to the content of this Code, Suppliers and their sub-suppliers shall enforce or create a management scheme to provide materials or labour for all their plants and suppliers in manufacture of goods ordered by ReNew. The management system shall be designed to ensure consistency with relevant laws and regulations, compliance with this Code, and detection and prevention of organizational risks consistent with this Code as a means of disclosing alleged or actual bribery or unethical behavior. It should also promote quality improvement.

Compliance with the Code of Conduct

ReNew will track compliance with this Code and ReNew, or its members, will contact factories to ensure that this regulation is complied with. Suppliers are required to share their affirmation in line with the Code along with the invoice / purchase order. Infringements of its Code shall be communicated to the Supplier for monitoring and remediation steps. Suppliers would be required to take corrective action and report on it to ReNew within the discussed timelines (determined by ReNew in its sole discretion basis the severity of the non-compliance). Suppliers and their sub-suppliers must comply with the process. In case of breaches, ReNew reserves the right to discontinue business with Suppliers.