

HFE Human Rights Assessment

FY 2024-25



About the Report



Purpose of This Document

This Human Rights Impact Assessment (HRIA) Report for HFE Limited is based on primary evidence collected through a site visit to the Bhadla Solar Plant, Rajasthan, along with structured interactions across management levels at the corporate office in Okhla, New Delhi. During the site visit, consultations were conducted with site-level management, employees, and contract workers. At the corporate-level, interactions included interviews and Focus Group Discussions (FGDs) with senior management and corporate employees alongside an interview with the company HR Head.

The assessment adopts a participatory approach to capture diverse perspectives across organisational levels and operational locations, ensuring that the findings reflect both policies and practices. The purpose is to provide HFE with structured insights into its existing policies, practices, and initiatives related to human rights across its operations. It also benchmarks these efforts against relevant international best practices and peer approaches, enabling HFE to identify gaps, strengthen its systems, and enhance its alignment with evolving human rights expectations and standards.



About This Report

This report translates field-level evidence into a structured **Risk Exposure Matrix** classifying every finding into a risk matrix and providing structured approaches to mitigate risks and realise opportunities the following information is captured in this report:

- A structured risk rating that translates on-ground findings into prioritised areas for attention.
- A management-systems review linking corporate commitments and policies to last-mile delivery.
- Insights into the site-specific risks and best practices, and possible good practice case studies that can be implemented by HFE

Risk Level

Definitions



High likelihood of current practices having a significant impact, which may require actions to be taken immediately or in the short-term.



Moderate likelihood of current practices having a significant impact, which may require mitigating action to be taken in the medium-term.



Low likelihood of current practices having a significant impact, but further improvement in managing risks may be advisable to prevent escalation in the future



Current practices are adequate, and no further actions or areas for improvement identified

Statement of Limitation

Data Collection Limitations

This statement ensures that the findings of this report are read in their proper context, acknowledging both what the assessment can reliably represent and that interpretive caution is warranted.

This assessment employed a **mixed-methods approach**, combining both primary and secondary research to ensure a comprehensive understanding of the salient issues relevant to the industry in which HFE operates.

Secondary Research (Desk-Based): The process began with an extensive desk review of existing literature, industry reports, and regulatory frameworks. This secondary research was used to identify key themes and issues pertinent to HFE's operating environment. Insights from this stage informed the design of the structured questionnaire, ensuring that the questions were grounded in sector-relevant challenges and opportunities.

Primary Research : Building on the questionnaire, primary data was collected through **structured interviews** with relevant stakeholders. These interactions included both corporate-level engagements and field visits, conducted in formats such as one-on-one interviews and focus group discussions (FGDs). The purpose of these interviews was to validate the presence or absence of the issues identified during the desk research, thereby reaffirming their relevance in practice.

Qualitative Methodology: The assessment deliberately adopted a qualitative methodology, as the objective was to capture nuanced stakeholder perspectives rather than quantify trends. Structured interviews allowed for depth of insight into stakeholder experiences, perceptions, and priorities. No quantitative data analysis was undertaken, as the focus remained on understanding context, validating issues, and surfacing actionable insights through narrative evidence rather than statistical measurement.



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We will be highlighting the group-level insights for HFE.

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Detail our observations made at the group-level corporate human rights management system

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Level of Analysis

Provide insights into human rights issues across identified level of operations and mitigation strategies

04

Best Practice & Case Studies

Identified strategic intervention areas identified through our engagement with HFE and peer best practices.

01

Executive Summary



Overall Approach of the Human Rights Assessment

Our approach was conceptualized around four stages: Scan, Collect, Assess, Mitigate, and Report. Each stage fed into the next, and through this process, we augmented HFE's comprehension of salient human rights risks and the means to mitigate these issues.

How was the assessment undertaken?

Scan

- **Built background information of the sector & location** by evaluating HFE's current human resources and labor practices against international standards (UNGP, ILO, SA8000, OECD) and applicable national laws.
- **Aligned Standards with Operations:** Mapped these standards to HFE's operations, including management, corporate HR, employees, and facility employees and workers.
- **Conducted an in-depth desk review of the existing Management system** for the Human Rights of the company through secondary research, available policies and ESG reports.

Collect

- **Prepared data collection framework** by defining the approach (quantitative or qualitative), method (Online/offline), sampling (across business division).
- **Developed and circulated stakeholder relevant questionnaires** which were administered through structured questionnaires and online interviews at the corporate and site level.
- **Collecting qualitative data from the critical stakeholders** through physical and online interviews.

Assess

- **Conducting the analysis post-data sanitization** based on the comparison between potential risk identified from desk-based research and actual risks identified during the stakeholder interactions.
- **Risk Context and Mitigation Understanding:** Once the risks were identified, the context behind them was outlined to help HFE better understand where mitigation steps are necessary, highlighting their relevance to international standards and national laws and regulations.

Mitigate

- **Developed mitigation measures** to minimize the impact of the gaps in the human rights practices and management system.
- **Comprehensive Report on Human Rights Practices and Mitigation Strategy:** A comprehensive report was developed to disclose HFE's current human rights practices and mitigation strategies, highlighting the company's approach to addressing identified risks and demonstrating its commitment to compliance with international standards and national regulations.

What outcome was delivered?

Salience Assessment Report

Data Collection Methodology & Questionnaire for each stakeholder group

A comprehensive report outlining critical human rights issues and risk-wise mitigation and remediation plan



Summary of Findings



How we conducted the assessment ?

This report consolidates findings across HFE operations, focusing on the Human Rights Impact Assessment (HRIA) conducted at two levels: corporate-level engagements with management and employees, and site-level analysis at Bhadla, Rajasthan with employees and contract workers

Overall Summary of HRIA

No significant risks were identified for Hero Future Energies in our scope of assessment. The Company has strong systems in place at the corporate and site levels. That said, the company can work on continued strengthening of its existing systems to ensure best practices are accentuated.



Medium Risk



Low Risk



No Risk / Best Practices

Solar Park Site (Bhadla)

- Employees demonstrated low awareness of HFE's existing career progression framework, indicating a gap between policy existence and its effective communication at the site level.
- Limited awareness of critical policies such as POSH, OHS, grievance Redressal was observed among site employees and contractual workers.

No low risks were identified at the site level based on the scope of this assessment.

- Strong community engagement programs, the company has been engaging in CSR activities since 2012, long prior to compliance mandates.
- No OHS incidents in the past 2000+ working days

Corporate Office (Okhla)

No medium risks were identified at the corporate level based on the scope of this assessment.

- Performance review program is in nascent stages and is based on an annual review and informal mid-year reviews, which is contradictory to management's response on a comprehensive PMS structure and policies.
- Gender targets of 30% by 2030 is looking unachievable due to a lack of lateral hires in the industry
- Inconsistencies in awareness of compliance trainings beyond POSH, which could point to lack of awareness
- Strong women leadership programs (Women leadership in AI)
- Flexible work culture based on accountability and delegation of authority, with a strong culture of trust within the organisation
- Assessment based L&D program with compliance trainings

Location Specific Observations

Observations: Human Rights Risk Assessment



The subsequent slides provide an overview of our observations and risk classification across salient human rights themes identified for each of the four divisions within the scope of this assessment.

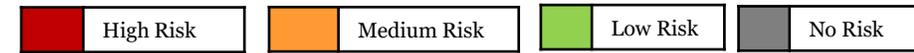
We have provided insights on the following three themes aligned with ILO and UNGP principles, where remedial interventions may be considered, or potential opportunities for improvement exist:

- Career Progression & Transparency
- Policy Commitment, Training and Awareness
- Diversity, Equity & Inclusion

These are specific areas that have been identified from the limited sample that we assessed.



Career Progression & Transparency

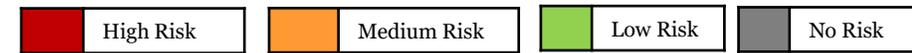


Level of Analysis	Site- Level	Corporate Office
Risk Type		
 <p>Observations</p>	<p>Employees at the site appeared to have limited understanding of career progression pathways, including the criteria, eligibility parameters, and timelines applicable to role upgrades and advancement opportunities. While HFE has a well-established career progression framework at the organizational level, feedback suggests that the framework may not have been sufficiently reinforced at the site level.</p>	<p>According to reporting during FGDs, employees noted that performance review program is in its nascent stages and currently relies on an annual performance review cycle supplemented by informal mid-year check-ins with direct management. KRA's are set at the beginning of the year. This is contradictory to the management's reporting of a thorough PMS system with defined KRA and career progression requirements laid out in the portal. This leads the assessor to believe there is a lack of formal awareness about current systems and processes</p>
 <p>Potential implications</p>	<p>Limited visibility of HFE's career progression metrics at the site level, if not proactively addressed, carries the potential to inadvertently impact workforce engagement, influence individual retention decisions, and give rise to perceptions of inequity in career advancement. Timely reinforcement of the framework would serve as a strategic measure in safeguarding talent retention, operational continuity, and the organization's commitment to transparent and equitable growth practices.</p>	<p>A lack of understanding of the performance review structure may, over time, lead to perceptions of bias, lack of transparency, and inequitable career progression due to a surface-level understanding of practices. Without holistic assessment channels, employees may feel undervalued and unheard, increasing the risk of workplace dissatisfaction, attrition, and potential discriminatory practices going undetected in evaluation decisions.</p>
<p>Possible mitigation measure/ improvement opportunities</p>	<p>HFE can initiate targeted trainings and capacity building across all site-level employees to effectively communicate the existing career progression framework through town halls, team briefings, accessible documentation, and mandated HR-led career pathway discussions to bridge the current awareness gap. Additionally, a structured mechanism should be established to ensure periodic reinforcement of career progression policies, including integration of progression milestones into performance review cycles and deployment of a digital dashboard enabling employees to track their eligibility, criteria fulfillment, and timelines for role upgrades.</p>	<p>Awareness sessions on PMS and career development should be more targeted and intensive to ensure there is a complete understanding of PMS systems. HFE can consider a multi-source performance framework incorporating structured mid-year reviews, 360-degree feedback, and clearly documented goal-setting criteria. Introduce mid-year milestone reviews and accessible feedback channels where employees can raise concerns about evaluation fairness, ensuring transparency, non-discrimination, and meaningful worker participation in their professional development.</p>

Policy Commitment, Training & Awareness

Level of Analysis	Site-Level	Corporate Level
Risk Type		
 <p>Observations</p>	<p>Policy awareness across the workforce at the Bhadla Solar Park facility was found to be inconsistent, with employees demonstrating limited fluency on key organisational policies and contractual workers exhibiting surface-level familiarity with critical policies such as POSH, Health & Safety, and Grievance Redressal.</p>	<ul style="list-style-type: none"> It was reported by individuals during an FGD with junior management position employees that they were nudged on having to reiterate compliance requirements from their LMS and L&D programs. While individuals in the FGD were able to name the intensive POSH training with external lawyers coming in for interactive sessions, other training compliances were not noted, showcasing a possible lack of overall L&D policy requirements.
 <p>Potential implications</p>	<p>Gaps in policy awareness across the workforce may result in the inadvertent non-adherence to statutory obligations and internal governance standards, weakened ability of workers to exercise their rights and access available protection mechanisms, and diminished effectiveness of the organisation's due diligence framework—collectively elevating exposure to regulatory, operational, and reputational risk.</p>	<p>Inconsistent awareness of compliance training beyond POSH among junior management indicates potential gaps in knowledge retention and policy dissemination. This raises the risk of non-compliance with regulatory and workplace obligations, weakened organizational safeguards, and employees being inadequately equipped to identify and respond to workplace rights violations or operational risks.</p>
<p>Possible mitigation measure/ improvement opportunities</p>	<p>HFE can undertake capacity building for all employees and workers at the site-level on key organisational policies through simplified and vernacular-friendly communication, while integrating policy awareness into performance metrics for site-level management to drive accountability and ensure sustained internalisation across the facility.</p>	<p>HFE can strengthen the L&D framework by implementing periodic refresher modules, structured compliance training calendars, and measurable completion tracking through the LMS. Ensure all mandatory trainings are clearly communicated, consistently reinforced, and supplemented with interactive delivery methods. It would also be useful to eventually inculcate a learning hours requirement for employees varying by management levels.</p>

Diversity, Equity, and Inclusion



Level of Analysis	Corporate Level
Risk Type	
 <p>Observations</p>	<p>HFE has set a target of 30% women's representation by 2030 but currently stands at 16%. Leadership acknowledged that the pipeline for women lateral hires in management is insufficient and listed this as a key organisational challenge. While the company is building capacity interanlly by prioritizing DEI hires, the company's DEI approach prioritises meritocracy, with diversity considered when two candidates are equally meritorious.</p>
 <p>Potential implications</p>	<p>A meritocracy-first approach can unknowingly perpetuate structural imbalances if pipeline barriers prevent women from reaching the evaluation stage in equal numbers. The discontinuation of anonymised screening removes a proven bias-reduction tool. With a 14-point gap to close in five years, the current trajectory risks the 30% target remaining aspirational rather than achievable, exposing HFE to scrutiny on the gap between stated commitments and demonstrated outcomes.</p>
<p>Possible mitigation measure/ improvement opportunities</p>	<p>HFE can choose to reinstate anonymised screening for initial recruitment stages only. They can also set measurable interim milestones at the quarterly level towards the 2030 target. In parallel, they can conduct a gender pay equity audit, develop a structured DEI Action Plan covering recruitment, retention, promotion, and leadership pipeline development, and create dedicated mentoring and sponsorship programs for women in mid-management to build the internal talent pool.</p>



02

Management System Review



Priority Human Rights Landscape: Corporate Commitments, Policies & Practices (1/2)

As part of the Human Rights Due Diligence and Impact Assessment engagement, a review was conducted across HFE’s corporate policies and Standard Operating Procedures (SOPs), anchored in the **UN Guiding Principles on Business and Human Rights (UNGPs)**, **ILO Core Conventions**, and **UN Global Compact (UNGC) Principles**. Based on extensive desk research, document review, and analysis of the company’s responses to the Information Request List (IRL), **nine priority human rights themes** were identified. The table below maps each right against HFE’s existing corporate commitments, policy instruments, and on-ground practices, thereby establishing a baseline that informs the impact assessment findings presented in the subsequent sections.

Priority Human Rights	HFE’s Corporate Commitment	Key Policies and SOPs
Land & resettlement	Respecting community rights; protecting land & water resources; securing FPIC where applicable; preventing adverse impacts; aim to be "People Positive"	<ul style="list-style-type: none"> <input type="checkbox"/> Impact re-assessment to confirm the nature, extent, and root cause of any adverse impact on land rights <input type="checkbox"/> Action plan for restoration and mitigation hierarchy for offsetting impacts
Indigenous & cultural rights	Respecting rights of indigenous, tribal & vulnerable groups; meaningful community participation in decisions	<ul style="list-style-type: none"> <input type="checkbox"/> Community engagement integrated into project planning, construction & operations
Forced & child labour	Strictly prohibits all forms of forced/compulsory labour, bonded labour, modern slavery & human trafficking	<ul style="list-style-type: none"> <input type="checkbox"/> Human Rights Policy <input type="checkbox"/> Slavery and Trafficking Statement
Water use & local resources	Protecting community access to safe water; promoting health and wellbeing	<ul style="list-style-type: none"> <input type="checkbox"/> Water conservation initiatives across plants <input type="checkbox"/> Periodic water stress assessments
Community health & pollution	Preventing environmental harm; responsible resource use; effective management of waste & emissions	<ul style="list-style-type: none"> <input type="checkbox"/> Defined Pollution Prevention and Management Plan



Priority Human Rights Landscape: Corporate Commitments, Policies & Practices (2/2)

Priority Human Rights	HFE's Corporate Commitment	Key Policies and SOPs
Wages & working hours	Fair, timely & lawful wages for all workers; reasonable and legally compliant working hours	<ul style="list-style-type: none"> ❑ Contract agreement adheres to applicable regulations on wages, and overtime
OHS & construction safety	OHS is a priority; every employee, contractor & partner works in an environment where risks are rigorously assessed, hazards controlled & safety upheld	<ul style="list-style-type: none"> ❑ Comprehensive OHS policy aligned as per international standards and applicable across all operations ❑ Site specific HSE plans to promptly address safety risks
Discrimination & harassment	Safe, inclusive, discrimination-free workplace; equal opportunities based solely on merit; zero tolerance for violence, and harassment	<ul style="list-style-type: none"> ❑ POSH Policy ❑ Equal Opportunity Policy
Freedom of association	Upholding universal right to freedom of association & collective bargaining; employees & contractors can freely form/join representative bodies & raise concerns without fear of retaliation	<ul style="list-style-type: none"> ❑ Accessible, transparent & responsive grievance mechanisms ❑ Dialogue with worker representatives to strengthen workplace democracy



03

Level of Analysis



How To Interpret The Top Tables For Each Level of the Organisation:

UNGP Salience	Assessment Scales			
Salience	1	2	3	4
Scope How many people could be affected by the harm	Very Small Less than 5% of the workforce considered impacted	Small >=5% of the workforce ~ <20% of the population considered impacted	Medium >=20% of the workforce ~ 80% of the population considered impacted	Large >=80% of the workforce impacted
Scale How serious would the impacts be for the victim?	Minor Unlikely to cause bodily harm/psychological damage/change to standard of living/livelihood	Moderate Could result in indirect bodily harm/psychological damage/moderate change to standard of living/livelihood	Significant Likely to result in direct bodily harm/lasting psychological damage/major change of standard of living/livelihood	Extreme May result in death or irreversible loss of physical or mental capacities/significant disruption in standard of living/livelihood
Remediability Will the remedy restore the victim to the same or equivalent position before the harm?	Remediable Remedy will return the victim to the same or equivalent position	Likely Remediable Remedy is likely to return the victim to the same or equivalent position before the harm occurred	Possibly Remediable Remedy may help return the victim to the same or equivalent position before the harm occurred	Not Remediable Most serious harm, remedies will not return the victim to the same or equivalent condition before harm occurred
Likelihood of Occurrence What is the likelihood of the risk occurring considering context and business relationships	Very unlikely Although a risk, it is highly unlikely that impacts on rights-holders may occur considering countries context and business relationships	Unlikely There is some minor risk that the impacts may occur considering countries context and business relationships	Likely It's more probable than not that the impacts on rights-holders may occur considering countries context and business relationships	Very Likely Currently occurring or high likelihood that the impacts on rights-holders may occur considering countries context and business relationships

UNGP Attribution

Ability to Address Risk	Levels	
Attribution	1	2
How closely connected is/would the company be to the human rights impact	Directly Linked The organization's operations or activities are directly impacting the stakeholders	Indirectly Linked The organisation's operations or activities are indirectly impacting the stakeholders (via supply chain)



Corporate Level Findings

Best Practices

01

Comprehensive Policy Infrastructure: Corporate employees demonstrated strong awareness of key policies and confirmed robust induction trainings (3–4 months with dedicated SPOCs), annual LMS refreshers for 7–8 policies, and interactive POSH training with external lawyers.

02

Strong Culture of Dignity & Respect: All respondents across corporate cadres consistently described a respectful, flat, non-hierarchical work culture. The open-door access to senior leadership, and responsiveness to junior colleagues were highlighted.

03

Open Door culture: The company operates in a flat hierarchy and enables communication across the different management levels in a free and open manner, enabling deeper connections across management levels.

04

Responsible Land & Community Due Diligence: Employees described pre-feasibility studies, ESIA processes, IFC Performance Standard alignment, stakeholder consultation, avoidance of indigenous community lands, and proactive resolution of community protests.

05

Employee Wellbeing Investment: Employees described 1to1 Health mental health app, monthly health vans, cardiovascular screenings, financial advisory, NPS trainings, women's health events, and national safety week activities, all well beyond baseline compliance requirements.

06

Strong Recognition & Employee Voice Architecture: Employees described GPTW surveys conducted for 4–5 years, internal theme-based surveys, results shared at board-level NRC meetings, the HFE “Expressions” WhatsApp instant gratitude framework, Green Awards, Cheers for Peers, showcasing a commitment to culture



Corporate-Level Analysis Summary

High Risk	Medium Risk	Low Risk	No Risk
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HFE's corporate operations reflect a genuinely well-intentioned, values-driven organization with a positive workplace culture, strong policy infrastructure, and meaningful community and environmental due diligence. The company's candour in self-identifying its gaps, particularly around supply chain DD, women's hiring pipeline, and contractor OHS, is itself a marker of organizational maturity.

Thematic Area	Scope	Scale	Remediability	Likelihood	Attribution	Actual Impact	Potential Impact	Risk Rating
Policy Commitment, Training, and Awareness	Medium	Minor	Remediable	Unlikely	Directly Linked	Inequality of Opportunity	Increased vulnerability to bias	Low Risk
Career Progression & Transparency	Medium	Minor	Remediable	Unlikely	Directly Linked	None	High attrition rates, employee dissatisfaction	Low Risk
Diversity, Equity, Inclusion	Medium	Minor	Remediable	Likely	Directly Linked	Not achieving the target of 30% females	Lack of a diverse workforce, lower social license	Low Risk

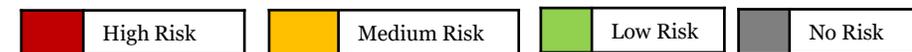
Impacted Rights-holder

- Employees
- New Joiners

Risk, Mitigation, & Remediation (1/2)

#	Thematic Area	Human Rights Risk (ILO/UNGP Alignment)	Observation	Remediation & Mitigation Strategy
1	Policy Commitment, Training & Awareness	Right to Information	During the Section D FGD with junior management-level corporate employees, respondents had to be nudged to recall compliance requirements from their LMS and L&D programs. While participants were able to recall the intensive POSH training, which involved external lawyers and interactive sessions, other mandatory training requirements could not be readily recalled without prompting. This suggests that while high-impact, event-based training (such as POSH) leaves a lasting impression, the broader suite of annual LMS-based policy refreshers may not be achieving the same level of retention or salience among employees,	<p>Short Term:</p> <ul style="list-style-type: none"> Review the current LMS training format to assess whether modules are engaging and scenario-based, or primarily passive/click-through in nature. Supplement LMS modules with periodic interactive touchpoints such as team-level discussion sessions or case-study workshops to reinforce retention. <p>Medium Term</p> <ul style="list-style-type: none"> Redesign the annual compliance training calendar to incorporate a blended learning approach by combining digital LMS modules with at least one in-person or live-virtual interactive session

Corporate-Level Analysis Summary



Risk, Mitigation, & Remediation (2/2)

#	Thematic Area	Human Rights Risk (ILO/UNGP Alignment)	Observation	Remediation & Mitigation Strategy
2	Career Progression & Transparency	Right to Information	Corporate employees reported the absence of a structured promotion framework as a direct concern, noting that there is no fixed promotion cycle, no documented protocol for how upgrades are decided. Although during management discussions, reporting was of a comprehensive PMS system that enables growth with defined growth trajectories. This can be primarily due to a lack of awareness. They also noted that while annual performance reviews with HR exist, there are no mid-year reviews, only informal check-ins with managers on performance and KRAs. These KRAs are set at the start of the year, but no respondent across the different interview groups described a written promotion policy with defined criteria, timelines, or appeal processes.	<ul style="list-style-type: none"> • Short Term: <ul style="list-style-type: none"> • Issue interim guidance to all employees explaining the criteria and process used for promotion decisions in depth. • Introduce formal mid-year performance conversations to supplement annual reviews and provide employees with clearer progression signals and growth paths. • Medium term: <ul style="list-style-type: none"> • Design and publish a Career Progression & Promotion Policy with defined eligibility criteria, assessment timelines, evaluation methodology, and an appeal mechanism. • Analyse promotion data by gender and tenure to detect any patterns. • Train people managers on objective, bias-free promotion decision-making.
3	Diversity, Equity and Inclusion	Stagnation and Gender Pay Gap	HFE has set a target of 30% women's representation by 2030 but currently stands at 16%. HR Leadership acknowledged that the pipeline for women lateral hires in management levels in the industry is insufficient and listed this as a key cross-organisational challenge. The company's DEI approach prioritises meritocracy, with diversity considered only when two candidates are equally meritorious. A previous practice of anonymised recruitment screening, hiding the gender and name of candidates, has been discontinued as it is 'not considered' and hiring is based solely on KRA's and how the candidate matches up to them.	<ul style="list-style-type: none"> • Short Term <ul style="list-style-type: none"> • Reinstate anonymised screening for initial recruitment stages • Set annual interim milestones tracked at board level. • Medium term: <ul style="list-style-type: none"> • Conduct a gender pay equity audit. • Develop a structured DEI Action Plan covering recruitment, retention, promotion, and leadership pipeline. • Create mentoring and sponsorship programs for women in mid-management

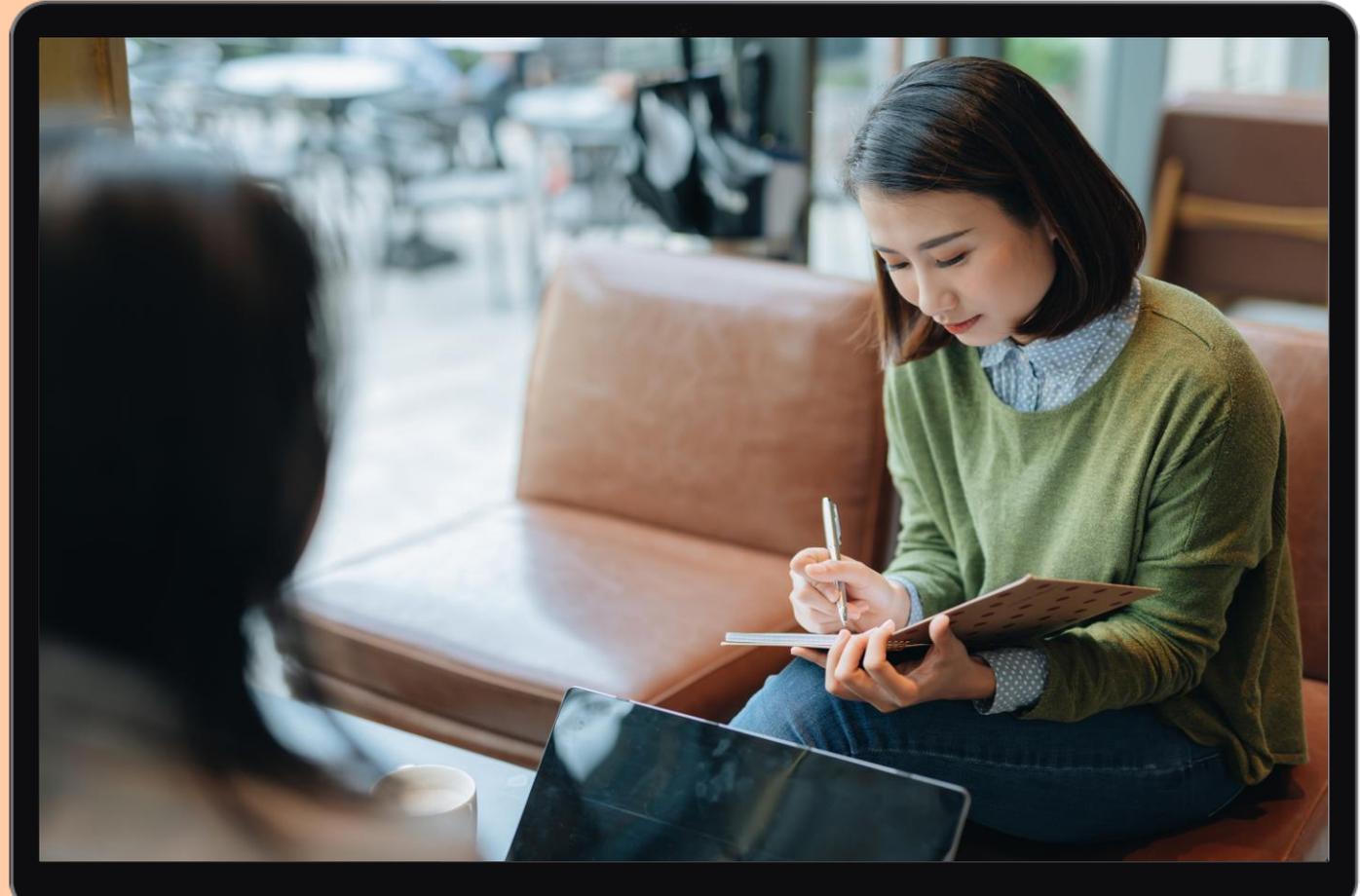
Field Insights

“The values that we started with are being carried forward and emphasised, dignity and respect are the utmost priority, and our employees’ rights must be protected”

The HR head stated that the ethos of the company has stayed the same since its inception, highlighting their strong practices from the onset

“We don’t use the term workforce, it’s like one big HFE family”

Employees highlighted that the organization prioritises unity and enhances workplace experiences through this culture.





Site-Level Findings: Bhadla Solar Park, Rajasthan

Best Practices

01

No evidence of child labour, forced labour, document withholding, or restriction of movement was reported across any employment category, indicating strong adherence to fundamental labour rights

02

Robust safety culture through daily toolbox talks, monthly safety trainings, seasonal hazard-specific trainings, regular PPE inspections and replacements.

03

Employee Wellbeing: Provision of dedicated mental health support through the Onetone Health app, periodic health check-ups via on-site health vans, financial literacy sessions, and seasonal welfare measures such as heat stress provisions.

04

Inclusive Workplace Culture: A good organisational culture was consistently noted across all groups, with employees highlighting the practice of addressing all personnel by name regardless of designation, and open accessibility to senior management.

05

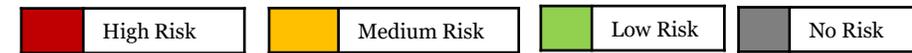
Adequate facilities for workers: Clean drinking water, hygienic canteen with complimentary meals, separate washrooms for men and women.

06

Comprehensive Statutory Benefits: Statutory benefits including PF, ESI, health insurance, and accident insurance are extended to both full-time employees and contractual workers, with extended coverage also provided to the contract workforce.



Site Level Analysis Summary



HFE's site-level operations fosters an inclusive and supportive work culture, with visible commitment towards maintaining a safe, respectful, and equitable working environment for all employees across levels.

Thematic Area	Scope	Scale	Remediability	Likelihood	Attribution	Actual Impact	Potential Impact	Risk Rating
Policy Commitment	Small	Moderate	Possibly Remediable	Likely	Directly Linked	Lack of policy comprehension	Operational non-compliance	Medium Risk
Career Progression & Transparency	Small	Moderate	Possibly Remediable	Likely	Directly Linked	Workforce disengagement	Employee attrition	Medium Risk

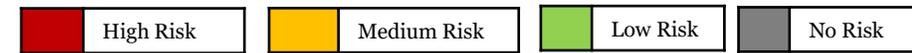
Impacted Rights-holder

- Employees
- Workers

Risk, Mitigation, & Remediation (1/2)

#	Thematic Area	Human Rights Risk (ILO/UNGP Alignment)	Observation	Remediation & Mitigation Strategy
1	Policy Commitment	Right to Information	It was reported that there exists a notable variance in the depth of policy awareness across different levels of the workforce at the facility. While management personnel demonstrated working knowledge of key organizational policies, they were unable to articulate these with reasonable fluency without referring to supporting documentation. Similarly, contractual workers exhibited only a surface-level familiarity with critical policies such as POSH, Health & Safety and Grievance Redressal, and required prompting to recall relevant trainings and provisions.	<ul style="list-style-type: none"> • Immediate: Undertake capacity building for all employees and workers on key organisational policies, with simplified and vernacular-friendly communication to ensure functional understanding across all levels. • Medium-Term: Integrate policy awareness into performance metrics for site-level management to drive accountability and ensure sustained internalisation of corporate policy commitments at the facility level.

Site-Level Analysis Summary



Risk, Mitigation, & Remediation (2/2)

#	Thematic Area	Human Rights Risk (ILO/UNGP Alignment)	Observation	Remediation & Mitigation Strategy
2	Career Progression & Transparency	Right to Information	It was observed that employees exhibited limited awareness and understanding of the existing career progression framework established by HFE. Despite HFE having a structured career progression framework in place — encompassing defined promotion cycles, role upgrade criteria, and associated timelines	<ul style="list-style-type: none"> • Immediate: HFE must provide targeted trainings and capacity building initiatives across all employees at the site level to effectively communicate the existing career progression framework through structured town halls, team briefings, and easily accessible policy documentation. Additionally, site HR teams should be mandated to conduct career pathway discussions with all employees, enabling them to understand the criteria, timelines, and opportunities available to them, thereby bridging the current awareness gap. • Medium-Term: A structured mechanism should be established at the site-level to ensure periodic and consistent communication of career progression policies at the site level, including the integration of career progression milestones into performance review cycles and the deployment of a digital dashboard enabling employees to track their eligibility, criteria fulfillment, and timelines for role upgrades.

Field Insights

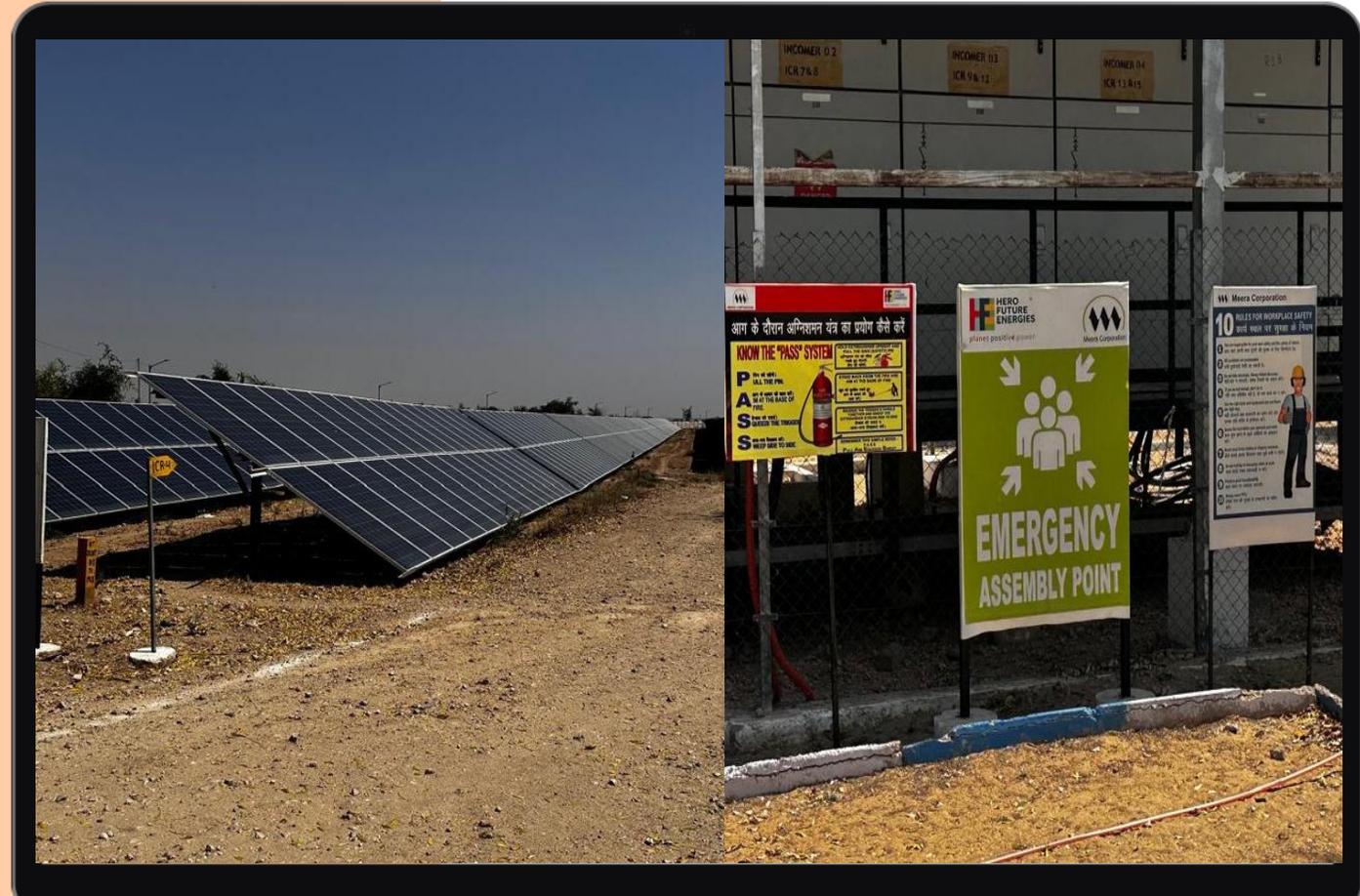
“Work pressure is less and the culture is better.”

Employees expressed a positive sentiment toward the overall work environment, indicating manageable workloads and a supportive organisational culture at the facility level.

"You can stop the generation also in case of any problems , safety is of maximum importance for all persons."

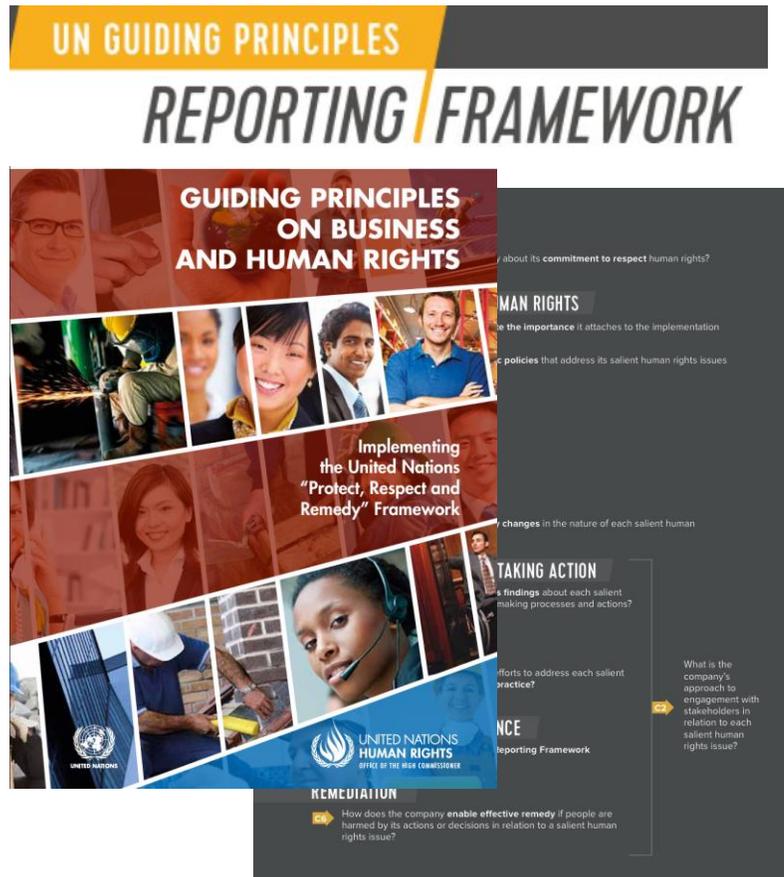
Employees highlighted that the organization prioritizes safety of all employees' over operational output.

Bhadla Solar Park



Annexure

Reference Documents for Human Rights Assessment



[GuidingPrinciplesBusinessHR_EN-7.pdf](#)

The UN Guiding Principles on Business and Human Rights (UNGPs) and ILO Labour Standards are the globally accepted benchmarks that define what responsible business conduct looks like when it comes to how companies treat their workers, communities, and supply chains.



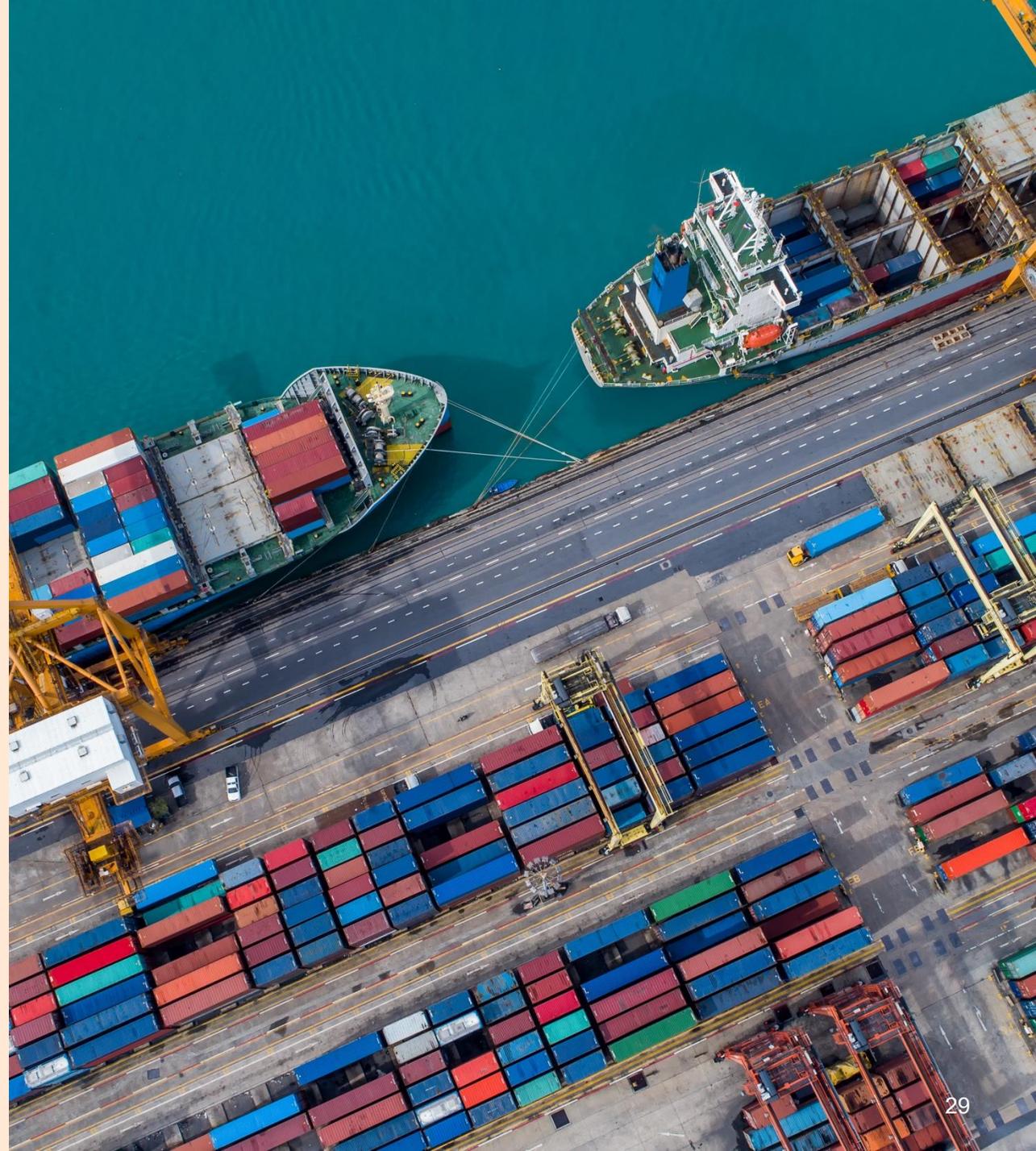
NORMLEX Information System on International Labour Standards

[Click on the link to search from the list of Human Rights \(Link\)](#)

International Labour Standards

[Click on this link for INTERNATIONAL LABOUR STANDARDS](#)

Approach & Methodology



Scope of Assessment

The objective of the study was to identify, assess and prioritise actual and potential human rights impacts across four business division of HFE, and evaluate the adequacy of existing mitigation measures.

The assessment examined human rights risks across

- **Direct operations** to gauge alignment between corporate policies and on-ground implementation and critical business divisions:
- **On-site full-time and contract workforce** to assess whether protections extend equally to all categories of workers
- **Critical suppliers** to understand risks arising through business relationships where the company may be linked to impacts but does not have direct operational control.

Stakeholders Engaged

- Full-time workers (on-site)
- Contract workers (on-site)
- Site Management
- Corporate employees
- HoD HR and senior management

Dates of Interaction

- Badla Site Visit- 10th March, 2026
- Corporate Interactions- 19th March, 2026



Data Collection Methodology



Steps for Data Collection

Development of Questionnaire & Field Guide

- Questionnaires were developed based on the salient rights identified and aligned with global standards such as UNGP, ILO and relevant Indian labour laws
- Separate interview guides were also prepared for each business division and stakeholder groups to acquire consent and ensure clarity, neutrality and appropriateness

Fieldwork & Logistics

- Field visits were conducted on across one operational site i.e Bhadla, Rajasthan
- Interviews with site level employees and workers were conducted face to face to allow deeper qualitative insights
- Participation was voluntary, and confidentiality was communicated to respondents
- Local language (Hindi) used where required

Sampling

Corporate Employees & Senior Management (varying samples) alongside HR Head of Department (Bhawna)

Site Level Employees & Workers (6 male contract employees)

Management Interactions (1 Site Manager and Safety Officer for Rajasthan region)

Snapshot of stakeholder interactions...

Team visited the site and interacted with site-level manager, permanent employees & contractual workers

Interaction with corporate level employees (virtually)

Thank you

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