

HFE Human Rights Salience Assessment Report



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About Hero Future Energies

Hero Future Energies (HFE) is a premier global independent power producer (IPP) and a strategic arm of the prestigious Hero Group, one of India's most iconic industrial conglomerates. Established in 2012, the company was created to spearhead the group's transition into the sustainable energy sector. Headquartered in London, HFE has rapidly scaled its operations across India, the UK, Vietnam, Ukraine, and Singapore, positioning itself as a major force in the global fight against climate change.

The company's operational philosophy is centred on the "**Planet, People, Profit**" framework, aiming to provide affordable and innovative clean-tech solutions. As of 2025, Hero Future Energies boasts a robust global portfolio of 6.5 GWp + 2 GWh (BESS) in wind and solar assets. Our technical expertise is diverse, covering utility-scale wind, solar, and hybrid plants designed to provide stable, round-the-clock power to the national grid.

A significant portion of HFE's operations is dedicated to the Commercial and Industrial (C&I) sector. By partnering with over 250 corporate clients, the company delivers customised rooftop and open-access solar solutions that help businesses drastically reduce their carbon footprints. Beyond traditional renewables, HFE is a pioneer in the Green Hydrogen space. They have successfully commissioned advanced pilot projects, including facilities that blend green hydrogen with industrial fuels like LPG and PNG to decarbonise heavy manufacturing processes.

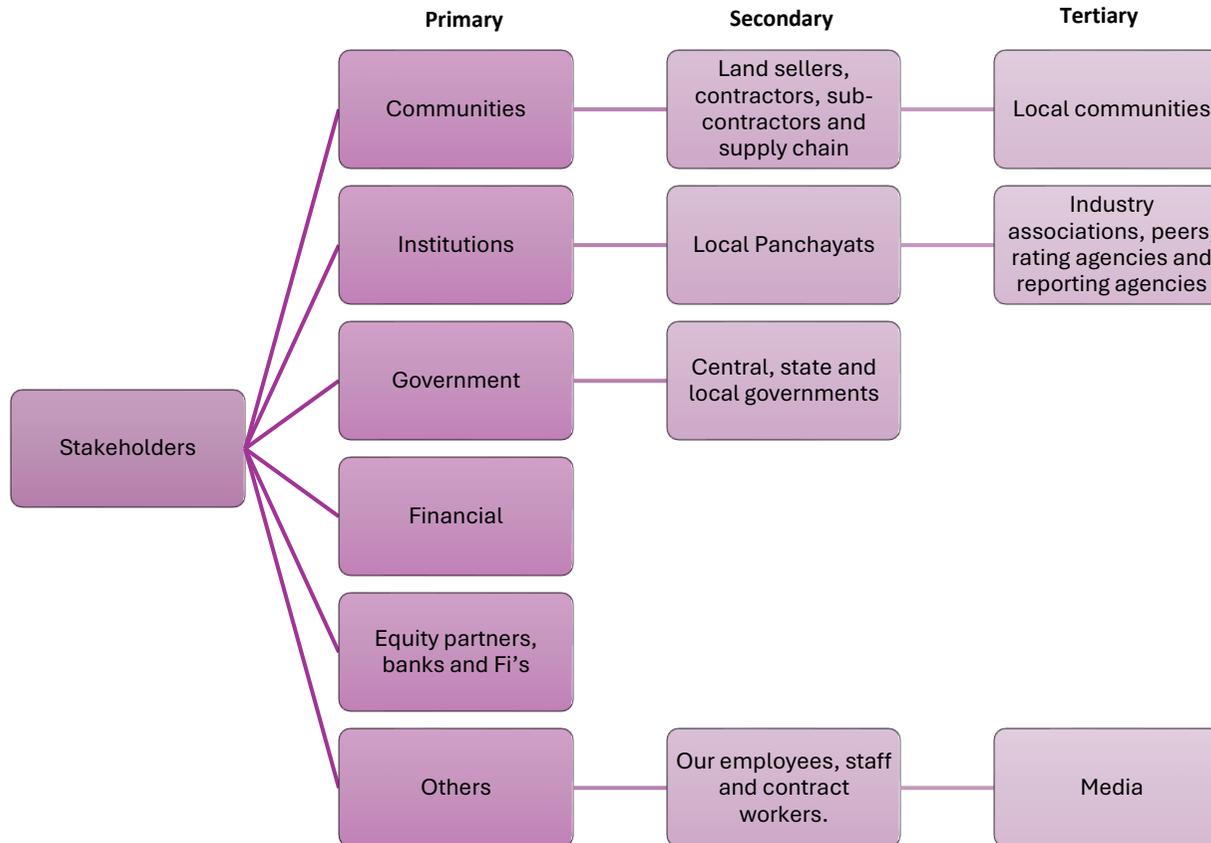
Value creation for stakeholders

Hero Future Energies generates value by integrating sustainable growth with technological innovation. For financial partners, the company offers a high-yield, de-risked portfolio backed by long-term contracts and geographic diversification across Asia and Europe. Pioneering hybrid plants and battery storage, it provides the grid with stable, round-the-clock power, solving the reliability issues of traditional renewables and supporting national decarbonization targets.

Industrial partners benefit from customised energy solutions that lower operational costs and fulfil net-zero commitments with lower upfront investments. Beyond the balance sheet, the company's "profit for purpose" model creates a lasting environmental legacy, aiming for carbon and water neutrality by 2030. This holistic approach ensures that every megawatt produced not only drives economic returns but also fosters local employment and ecological preservation, securing a resilient future for the global energy landscape.

HFE's Stakeholders

As a forward-looking enterprise committed to sustainability and social responsibility, Hero Future Energies (HFE) recognizes that meaningful engagement with its stakeholders is essential to uphold human rights and build trust across its operations. HFE has established a structured and inclusive stakeholder engagement framework that helps identify, understand, and respond to the needs, concerns, and expectations of all groups affected by its business activities. These include employees, contractors, suppliers, local communities and other partners making this engagement process an integral part of how HFE assesses and manages human rights risks, ensuring that potential impacts are identified early, communicated transparently, and addressed collaboratively. Through ongoing dialogue, grievance mechanisms, and active involvement in decision-making, HFE strives to respect the dignity, rights and wellbeing of people across its value chain, while reinforcing its commitment to ethical conduct and responsible business practice.:



Context Setting

In line with HFE’s commitment to strengthening its long-term value creation in an increasingly globalized environment, and to delivering responsible and sustainable value to all stakeholders, it is essential to understand and comply with international, national, and regional or local laws and frameworks governing human rights across sectors and industries.

International and national human rights frameworks provide critical guidance for HFE to respect, protect, and promote fundamental human rights throughout its operations and value chain. Alignment with these frameworks enables HFE to ensure legal compliance, manage risks effectively, and reinforce its commitment to ethical and responsible business conduct. Additionally, these frameworks support HFE in anticipating and responding to evolving stakeholder expectations.

The timeline below highlights key international human rights laws and frameworks and explains their relevance within the Indian context.



Indian Context

India's human rights framework is multi-layered and highly relevant to the renewable energy sector as large-scale solar and wind projects expand their footprint across the country. The Constitution of India guarantees fundamental rights including the right to life and personal liberty (Article 21), equality before the law (Article 14), freedoms under Article 19, and protections against exploitation (Articles 23 and 24). Judicial interpretation has expanded Article 21 to include the right to livelihood, health, safe working conditions, and a clean and healthy environment. These protections are directly relevant to renewable energy development, where project siting, construction activities, and operational impacts may affect local communities, workers, and surrounding ecosystems.

In India, companies operating in the independent power generation sector are subject to a comprehensive regulatory framework spanning labour, environmental and sector-specific energy laws. Labour compliance is governed by the four consolidated labour codes, which set requirements on wages, industrial relations, occupational health and safety, and social security contributions. These obligations are particularly material during construction and installation phases involving contractor workforces, as well as during ongoing operations and maintenance. Environmentally, while most grid-connected solar and wind projects are typically exempt from full environmental impact assessments, clearances may be required where projects involve forest land, protected areas, coastal regulation zones or other ecologically sensitive regions. Applicable legislation includes the Environment (Protection) Act, 1986, the Forest (Conservation) Act, 1980 and the Wildlife (Protection) Act, 1972, alongside relevant state-level consents and land acquisition requirements.

Institutional mechanisms such as the National and State Human Rights Commissions, labour authorities, and environmental regulators provide formal avenues for oversight and redress. However, broader systemic challenges including uneven enforcement, informal labour markets, and barriers to access to justice for vulnerable groups, heighten the importance of robust corporate-level due diligence and grievance mechanisms. In this context, renewable energy companies must address human rights risks holistically across the project lifecycle and value chain, encompassing worker welfare, non-discrimination, community health and safety, environmental stewardship, supply chain integrity, and access to remedy.

India has also engaged with the international human-rights architecture that underpins contemporary corporate due diligence expectations. The country participates in UN processes and has engaged with the UN Guiding Principles on Business and Human Rights (UNGPs), which are increasingly relevant to private and public sector actors in the renewable energy value chain. The Government of India initiated a National Action Plan (NAP) process on Business and Human Rights, releasing a zero draft and conducting public consultations in 2019, to articulate how the State intends to implement the UNGP "protect, respect and remedy" framework. Although the NAP remains under development, the process and accompanying policy discourse signal a clear shift toward formalising expectations around corporate human-rights due diligence. For renewable energy developers, investors, and manufacturers, this emerging policy direction underscores the growing expectation that clean energy transitions in India must be pursued in a manner that respects human rights, ensures meaningful stakeholder engagement, and provides effective grievance and remedy mechanisms. In practice, a number of national laws translate into binding obligations that matter directly for companies and their supply chains:

Key Affected Groups Across Value Chains in India

Labour and worker rights

India has consolidated central labour statutes into four comprehensive labour codes to set standards on wages & social security

Child Labour

Banned hazardous child labour and restricted other forms of child work through the Child & Adolescent Labour Act.

OHS & environment

The government has established Strict environmental and social norms and for renewable energy operations.

Sexual harassment

Mandated Internal Committees and formal redress systems in all workplaces and project sites under the POSH Act.

Land & Forest Rights

India has recognised forest-dwelling communities' customary rights through the Forest Rights Act with encroachment coming with significant penalties.

Corporate Disclosure

India has required human-rights-related reporting through the BRSR Core and CSR obligations for the top 1000 companies by market capitalization.



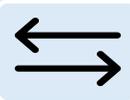
Occupational Hazards: While solar operations tend to be low risk, wind turbine operations can be dangerous if the right safeguards are not installed and SOPs are not clear on how to conduct operations in a low risk manner according to applicable guidelines such as the HIRA that



Informal workers are highly exposed because India's workforce is predominantly informal (88.4% per ILO, 2024), leaving most workers without formal contracts, labour protections, social security, or bargaining power.



Women workers are concentrated in informal, home-based and low-wage supply-chain roles. Structural gender inequalities, lower pay, limited social protection and heightened risks of exploitation and harassment increase their vulnerability.



Migrant workers often work in temporary, insecure roles with weak contracts, limited social networks and poor access to housing, healthcare and social security. Their exposure intensifies during crises such as heatwaves, economic shocks or public-health emergencies.



Children and adolescent workers remain at risk in agriculture, small-scale manufacturing and subcontracting due to poverty, lack of schooling, debt cycles and weak enforcement of child-labour laws.



Communities living near renewable energy sites face risks from noise, deforestation, clean water access and land-use change, which can affect health, livelihoods and access to natural resources. They often bear the downstream impacts of weak environmental compliance.



Low-income and energy-vulnerable consumers may face safety, affordability, and reliability risks in the renewable energy sector where product quality, marketing practices, installation standards, or supply-chain transparency are weak.

An Overview of Human Rights Issues Across High-Risk States in India

State	Maharashtra	Rajasthan	Madhya Pradesh
Description of Risk	In Maharashtra, rapid deployment of solar and wind projects has occasionally led to disputes with farming communities. Land that has been cultivated or used for generations is sometimes allocated to renewable energy developers without proper consultation or compensation, leading to tensions. Farmers have protested and even staged hunger strikes, highlighting the state's human rights concerns around agrarian land rights and the inclusion of affected communities in planning processes.	Rajasthan, a leader in solar energy, similarly faces significant human rights challenges. The massive solar parks required for the state's ambitious renewable targets have at times encroached upon lands historically used by local communities, including the Oran forests in the Thar Desert, which have cultural, ecological, and economic significance. These developments have limited access to grazing land, threatened local livelihoods, and curtailed Indigenous communities' rights to free, prior, and informed consent. The state exemplifies the tension between rapid renewable expansion and the protection of community and environmental rights.	In Madhya Pradesh, the renewable energy sector has seen some of the highest human rights tensions in India, primarily due to land acquisition and tribal rights conflicts. There have been a lot of reports of industrialists establishing projects on lands belonging to tribal and Scheduled Caste farmers without proper consultation or compensation. These projects often exploited gaps in literacy and land documentation, leaving marginalized communities vulnerable. The resulting issues include loss of land, disruption of livelihoods, and violation of Indigenous rights, highlighting the need for stronger safeguards and community engagement in project planning.

State	Karnataka	Tamil Nadu	Telangana & Andhra Pradesh
Description of Risk	In Karnataka, while the state has become a hub for solar energy, conflicts have arisen as solar parks occupy agricultural and grazing lands, affecting farmers, pastoral communities, and landless laborers. Protests and project delays, including the scrapping of a 500 MW solar park in Bidar due to resistance from local farmers, highlight the need to balance livelihood protection and	Tamil Nadu, another major renewable energy player, faces challenges primarily around the use of agricultural and communal lands for wind and solar projects. The conversion of these lands can negatively impact small farmers and landless laborers who rely on them for income or grazing, creating a livelihood and environmental rights issue. While less severe than in Rajasthan or Madhya Pradesh, the human rights dimension emphasizes	Telangana and Andhra Pradesh, while actively expanding renewable energy capacity, currently show relatively lower levels of documented human rights conflict compared with the northern and western states. Telangana faces emerging risks in rural areas where land for solar and wind projects overlaps with agricultural and community use, while Andhra Pradesh has

	equitable benefit-sharing alongside energy goals.	the importance of participatory decision-making and fair compensation in renewable project planning.	experienced few large-scale disputes to date. Nonetheless, both states need proactive policies to ensure community consultation, fair compensation, and protection of marginalized groups before large-scale projects escalate conflicts.
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State	Delhi
Description of Risk	New Delhi, being predominantly urban, experiences the lowest human rights risk in the renewable energy sector. Its renewable generation focuses mainly on rooftop solar and urban-scale projects, which require minimal land acquisition. Human rights concerns in Delhi center less on displacement and more on equitable access to clean energy and affordability, ensuring that low-income households benefit from the transition to renewable energy without being marginalized.

HFE’s Human Rights Scoping Framework

HFE has developed a Human Rights Scoping Framework that systematically identifies and prioritizes the most salient human rights risks across its renewable energy operations and value chain, mapping potential impacts on employees, contracted workers, suppliers, customers, and host communities and is available in their ESGMF policy. Grounded in international standards such as the ILO Core Conventions, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines, alongside applicable national laws, the framework ensures that safeguards are maintained and risks are mitigated. By embedding stakeholder engagement, transparent reporting, and collaborative risk management into its processes, HFE strengthens accountability and fosters positive human rights outcomes.

Type of Rightsholders	Overall Human Rights Issues Identified	Standard Alignment
Employees	Discrimination & Equal Opportunity Issues Working Conditions (Employee Support Programs) Freedom of Association Health, Safety & Psychosocial Risks Inclusion & Accessibility Gaps	ILO UNGP OECD SA8000 ISO 26000, ISO 45001, ISO 45003, ISO/IEC 27001,
On Site Workers/ Laborers	Discrimination, Harassment & Gender-Based Violence Working Conditions (Water, Sanitation and Hygiene facilities) Forced, Bonded & Child Labour Fair Wages, Payment Practices & Working Hours Occupational Health & Safety Freedom of Association Migrant Worker Exploitation	ILO UNGP OECD Guidelines SA8000 UN Convention on the Rights of Persons with Disabilities (CRPD) GDPR / Global Data Protection Frameworks ISO 26001, ISO 45001
Suppliers	Wages, Payment Practices & Working Time Occupational Health & Safety at Supplier Sites Discrimination, Harassment & Gender-Based Violence Migrant Worker Vulnerabilities	ILO UNGPs OECD Guidelines SA8000 ISO 26000, ISO 45001 UN Migrant Workers Convention
Local Project Communities	Land Rights & Involuntary Resettlement Environmental pollution & shared resource impacts (water, air, soil) Cultural heritage & Indigenous rights	ILO IFC Performance Standards ISO 14001 / ISO 26000 UNESCO conventions

Identification of Salient Human Rights Risks

In line with the UN Guiding Principles, this report concentrates on the human rights issues most exposed to severe negative impacts across our operations and business relationships. These salient risks were identified through a structured process that combined cross-functional dialogue, online surveys, and expert input. The assessment considered the seriousness of potential harm to people, the breadth of those affected, and the challenges of remedying harm once it occurs. By integrating stakeholder perspectives and validating our findings externally, we established a clear set of priorities that now form the backbone of our human rights reporting.

Salient Human Rights Risk	Scope	Scale	Irredeemability	Likelihood	Final Risk Rating
Land & resettlement	High	High	Not redeemable	High	High
Indigenous & cultural rights	Medium	High	Not redeemable	Medium–High	High
Community health & pollution	Medium	Medium	Possibly redeemable	Medium	Medium
Water use & local resources	Medium	Medium	Possibly redeemable	Medium	Medium
Forced & child labour	Medium	High	Not redeemable	Medium	High
Wages & working hours	Medium–High	Medium	Likely redeemable	High	High
OHS & construction safety	Medium	High	Not redeemable	Medium	High
Discrimination & harassment	Medium	Medium	Possibly redeemable	Medium–High	Medium–High
Freedom of association	Medium	Medium	Possibly redeemable	Medium	Medium

The human rights risk matrix presents an initial prioritization of salient human rights risks across HFE’s operations and value chain. Each right has been assessed across four dimensions- scope, scale, remediability, and likelihood, based on desk research and internal inputs. The resulting salience prioritization reflects both the severity of potential impacts on people and plausibility of their occurrence.

Salient Human Rights

Land & Resettlement		
Forced & Child Labour		OHS & Construction Safety
Wages & working hours	Discrimination & harassment	Freedom of Association

Let’s now explore each of the identified human rights issues in greater depth. The level of detail varies across topics, reflecting the maturity of our programmes and the extent of experience we have in certain areas. Variation does not imply that some issues carry greater importance for our business or stakeholders, nor does it signal any difference in our commitment. As our strategy evolves and our reporting expands, we expect the depth of coverage to shift, ensuring that all issues are addressed with increasing rigor over time.

Salient Human Rights Risks

Child Labour and Young Workers



Workers



Suppliers

ILO Conventions 138 and 182, United Nations Convention on the Rights of the Child

Child labour remains a significant human rights risk within India’s informal and contract-driven economy, particularly in sectors such as energy and renewable infrastructure that rely heavily on subcontracted, temporary, and migrant labour. Socio-economic vulnerabilities including poverty, seasonal migration, limited access to education, and dependence on informal employment can create conditions where children are engaged in ancillary or support activities linked to project sites, supply chains, or labour camps. These may include material handling, site housekeeping, waste collection, basic assembly tasks, or assistance in informal workshops, exposing children to hazardous environments, heavy equipment, electrical risks, and unsafe working conditions while disrupting their education and development.

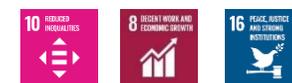
The risk is particularly relevant across HFE’s operating geographies, including Maharashtra, Rajasthan, Madhya Pradesh, Karnataka, Tamil Nadu, Telangana, and Andhra Pradesh, where large-scale renewable energy projects, transmission infrastructure, and associated construction activities often depend on migrant and informal labour during peak installation phases. In states such as Rajasthan, MP, Maharashtra, Telangana, and AP, the scale of infrastructure development, coupled with labour-intensive

construction and multi-tier subcontracting, heightens the risk of child labour within peripheral or upstream activities. In southern states like Karnataka and Tamil Nadu, while regulatory oversight is comparatively stronger, risks may persist within fragmented contractor networks and informal service providers. Despite national legislation and international conventions prohibiting child labour, enforcement gaps, limited visibility beyond primary contractors, and complex supply chains can allow such risks to persist beyond direct operations and into upstream and ancillary value chains.

Commitment	Detection & Prevention	Remediation
<p>HFE maintains a zero-tolerance approach to the employment of individuals under 18 years of age and to any form of child labour, forced or trafficked labour, discrimination, or harassment across its operations and value chain.</p>	<p>HFE seeks to prevent and detect child labour through robust due diligence and monitoring mechanisms across its operations and value chain, including age verification at hiring, mandatory compliance requirements for contractors and subcontractors, and periodic site audits and inspections, particularly at high-risk project locations. Where instances of child labour are identified or suspected, HFE takes immediate corrective action, including removal of the child from hazardous work, engagement with the contractor to ensure remediation, and referral to appropriate support mechanisms to facilitate access to education or welfare services, while strengthening oversight and controls to prevent recurrence.</p>	<p>We have a strict zero-tolerance policy towards child labour, and in the event that any instance is identified, HFE ensures the immediate removal of the child from the worksite and prioritises their safety and well-being through appropriate remediation measures, including facilitating access to education or welfare support in line with applicable laws. Corrective and disciplinary actions are undertaken with the responsible contractor or supplier, root causes are assessed, and controls and monitoring mechanisms are strengthened to prevent recurrence, and we also continue to train people on the same.</p>

Forced and Bonded Labour

ILO Convention 29 — Forced Labour Convention, ILO Convention 105 — Abolition of Forced Labour Convention, UN International Covenant on Civil and Political Rights (ICCPR), and UN Guiding Principles on Business and Human Rights (UNGPs)



Workers



Suppliers

Forced or compulsory labour represents a serious violation of human dignity and fundamental labour rights, and global frameworks such as ILO Conventions 29 and 105 clearly affirm that all work must be undertaken freely and without coercion. In practice, however, forced labour does not always manifest through visible force or confinement; it often emerges through more subtle mechanisms such as delayed or withheld wages, retention of identity documents, recruitment-related debt, excessive

dependence on contractors, or working conditions that make it practically impossible for a worker to leave employment. In the Indian context, the Bonded Labour System (Abolition) Act, 1976 reinforces these principles by prohibiting any arrangement that binds workers through debt, threat, or economic dependency. Together, these standards underscore a core principle relevant to HFE’s operations: employment must be voluntary, and any condition that compromises a worker’s freedom of choice or mobility may amount to forced labour.

Within the energy and renewables sector, forced labour risks are particularly relevant due to the scale, geographic spread, and project-based nature of operations, which often rely on contract labour, migrant workforces, and multi-tier subcontracting, especially during construction, installation, and maintenance phases. For HFE, these risks may arise not only at core project sites but also across ancillary and upstream activities such as civil works, electrical installation, transportation of equipment, warehousing, security, housekeeping, and facilities management. Economic vulnerability, lack of stable employment, and migration from rural or economically weaker regions can push workers to accept unfavourable conditions, including advance payments that lead to debt dependency, excessive overtime, restricted mobility due to contractor-controlled accommodation or transport, or informal arrangements without written contracts. Limited awareness of labour rights, fear of retaliation, and weak grievance access can further entrench coercive conditions, making forced labour a systemic risk rather than an isolated violation within complex project ecosystems.

Across HFE’s operating geographies - Maharashtra, Rajasthan, Madhya Pradesh, Karnataka, Tamil Nadu, Telangana, Andhra Pradesh, and Delhi, forced labour risks are influenced by local socio-economic conditions, migration patterns, and reliance on informal recruitment and subcontracting. This risk for HFE is most pronounced where subcontracting, labour intermediaries, and limited site-level oversight intersect, reinforcing the need for strong contractor management and targeted due diligence.

Commitment	Detection & Prevention	Remediation
HFE strictly prohibits all forms of forced or compulsory labour, including bonded labour, modern slavery, and human trafficking, as well as any practices such as the retention of original identity documents, wage withholding, or coercive conditions that restrict a worker’s freedom to leave employment, across its operations and value chain.	HFE ensures the prevention and detection of forced labour through strong onboarding and contractor management processes, including a strict zero-tolerance policy and the clear requirement that no original identity documents are requested, retained, or held during recruitment or employment. Regular site-level monitoring, contractor audits, and checks on wage payments, working hours, and living conditions are carried out to identify any indicators of coercion, while accessible grievance mechanisms enable workers to report concerns without fear of retaliation.	Where forced or bonded labour is identified or suspected, HFE initiates immediate corrective action to safeguard affected workers, including ensuring their freedom to leave employment, recovery of any withheld wages or documents, and access to appropriate support or legal remedies where required. Non-compliant contractors or suppliers are subject to corrective and disciplinary measures, root causes are investigated, and we uphold internal due-diligence processes and periodically undertake human rights due diligence to support effective management, oversight, and monitoring of this policy and to identify and address any gaps or shortcomings in its implementation.

Working Hours

ILO Convention No. 1: Hours of Work (Industry) Convention, 1919
Article 24 – Right to rest and leisure , Factories Act, 1948, Labor Code,2025



Employees



Workers



Suppliers

Given the project-driven and operational nature of **HFE’s energy and renewables business**, managing working hours is essential to protect worker health, safety, and well-being. Activities such as construction, installation, commissioning, and maintenance often involve tight timelines, peak execution phases, and reliance on contract and migrant labour, which can result in extended shifts, night work, or limited rest if not properly controlled. Excessive working hours increase the risk of fatigue, reduced alertness, and accidents, particularly in high-risk environments involving heavy equipment, electrical systems, and work at heights.

Unregulated or prolonged working hours therefore remain a salient human rights risk across HFE’s operations and value chain, especially where subcontracting and informal work arrangements are prevalent. Workers in vulnerable positions, including contract and migrant labour, may have limited ability to refuse overtime or raise concerns, potentially leading to stress, health impacts, and compromised dignity. This underscores the importance of effective working-time management, legal compliance, and alignment with international standards to ensure safe, fair, and sustainable working conditions across all HFE activities.

Commitment	Detection & Prevention	Remediation
HFE is committed to ensuring reasonable and legally compliant working hours that safeguard the health, safety, and well-being of all workers across its operations and value chain, in alignment with applicable labour laws and internationally recognized standards	HFE prevents and detects risks related to excessive working hours through clear working-time policies, regular monitoring of attendance and overtime records, and oversight of contractors and subcontractors to ensure compliance with statutory limits. Overtime is strictly minimised and permitted only in exigent circumstances, in accordance with a defined standard operating procedure that requires necessary internal approvals and full adherence to applicable legal requirements, while site-level supervision and worker grievance mechanisms enable early identification and correction of any deviations.	Where instances of excessive or non-compliant working hours are identified, HFE undertakes immediate corrective action, including adjusting work schedules, enforcing mandatory rest periods, and ensuring appropriate overtime compensation in line with legal requirements. Root causes are assessed with the responsible teams or contractors, corrective measures are implemented to prevent recurrence, and enhanced monitoring and training are carried out to reinforce compliance with working-time standards across operations and the value chain.

Ensuring Fair Wages and Income

ILO Convention 131- Minimum Wage Fixing Convention, ILO Convention 173- Protection of Workers' Claims (Employer's Insolvency) Convention, ILO Convention 100- Equal Remuneration Convention, ILO Convention No. 95 – Protection of Wages (1949), ILO Convention No. 100 - Equal Remuneration, 1951, ILO Convention No. 131 - Minimum Wage Fixing Convention, 1970, Code on Wages, 2019



Employees



Workers



Suppliers

Fair wages and income security are fundamental labour rights and remain a key challenge within India’s infrastructure and energy ecosystem, particularly in project-based sectors that rely on contract, migrant, and temporary workforces. Despite the existence of statutory minimum wage requirements and social security frameworks, risks persist due to inconsistent enforcement, informal employment arrangements, and dependence on labour intermediaries. These challenges can result in underpayment, delayed wage disbursement, unpaid overtime, or limited access to statutory benefits, with migrant workers, women, and contract labour often facing heightened vulnerability due to limited bargaining power and documentation gaps.

Within HFE’s energy and renewables operations, wage-related risks may arise across construction, installation, operations and maintenance activities, as well as ancillary services such as logistics, security, housekeeping, and facilities management that are commonly executed through contractors and subcontractors. Exposure typically stems from multi-tier contracting, piece-rate or irregular payment structures, delayed payments, unauthorised deductions, or incomplete coverage under social security schemes. Ensuring fair wages is therefore a critical component of HFE’s human rights responsibilities, requiring strong contractor oversight, payroll and wage compliance checks, clear contractual requirements, and accessible grievance mechanisms in line with applicable labour laws and internationally recognised standards.

Commitment	Detection & Prevention	Remediation
<p>HFE is committed to ensuring fair, timely, and lawful wages for all workers across its operations and value chain, in compliance with applicable labour laws and aligned with internationally recognised standards on fair remuneration and income security.</p>	<p>HFE ensure fair wages through defined standard operating procedures that require compliance with applicable minimum wage laws, timely wage payments, and accurate payroll records across operations and contractor-managed activities. Wage rates are periodically benchmarked against statutory requirements and industry standards, and monitoring mechanisms are in place to identify deviations, supported by oversight of contractors and accessible grievance channels.</p>	<p>HFE addresses wage-related issues through regular monitoring of workforce and supplier performance, based on which wage levels and payment practices are reviewed and determined, including for contractors and suppliers. Fair wages are reviewed monthly to ensure payments are made in accordance with the applicable minimum wage requirements This process is supported by periodic benchmarking against statutory minimum wage requirements and industry standards, ensuring that remuneration remains fair, consistent, and aligned with applicable legal obligations across operations and the value chain.</p>

Discrimination and Equal Treatment

Universal Declaration of Human Rights (UDHR, 1948), ILO Convention No. 111 (Discrimination, Employment and Occupation, 1958), Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW, 1979), Constitution of India (Articles 14–18), Protection of Civil Rights Act (1955), The Rights of Persons with Disabilities Act (2016)



Employees



Workers



Suppliers

At
Hero

Future Energies (HFE), preventing discrimination is a fundamental organisational principle and central to fostering a diverse, equitable, and inclusive workplace. This commitment applies to all employees across corporate offices, project sites, and operational roles. DEI principles are embedded across recruitment, remuneration, performance management, and talent development processes to ensure that growth, recognition, and rewards are based solely on merit, skills, and role requirements, without bias related to gender, caste, disability, religion, or social background.

HFE recognises that discrimination and bias can adversely affect career progression, pay equity, and workplace safety, particularly in operational and site-based roles. Ensuring fairness and inclusion is therefore critical to maintaining a strong safety culture, enabling grievance reporting without fear of retaliation, and supporting employee well-being and performance.

Operating across multiple regions in India, including semi-urban and rural areas, HFE acknowledges heightened risks of exclusion due to socio-economic disparities and social norms. The company implements inclusive workplace practices to ensure equal access to training, development, and career opportunities for all employees, including women and individuals from underrepresented communities.

Commitment to Women’s Empowerment and Workplace Equality

HFE is committed to safeguarding women at the workplace through equal opportunity hiring, merit-based career progression, and fair remuneration. The company enforces a zero-tolerance approach to harassment through a robust POSH policy, supported by awareness programmes and formal grievance mechanisms. These measures align with national legislation and global best practices, reinforcing HFE’s commitment to a safe, respectful, and inclusive workplace.

Commitment	Detection & Prevention	Remediation
Hero Future Energies is committed to providing a safe, inclusive, and discrimination-free workplace where equal opportunities for employment, growth, and remuneration are ensured for all, based solely on merit and in line with applicable laws and human rights standards.	We have clearly defined an Equal Employment Opportunity Policy that applies across all Hero Future Energies operations and employment stages. Non-discrimination principles are embedded in recruitment, compensation, performance evaluation, training, promotion, transfer, and termination processes to ensure fair and merit-based decision-making. Risks of discrimination, harassment, or unsafe behaviour are detected through formal grievance redressal mechanisms, POSH Internal Committees,	Hero Future Energies has established formal mechanisms to ensure timely and effective remediation of any instance of discrimination, harassment, or unequal treatment. All complaints are addressed through defined grievance redressal procedures, POSH Internal Committees, and whistleblower mechanisms, ensuring confidentiality, impartial investigation, and protection against retaliation. Where violations are identified, HFE takes appropriate corrective and disciplinary action in line with internal policies and applicable laws, which may

	<p>whistleblower channels, and periodic HR and management reviews. We maintain zero tolerance for violence, harassment, intimidation, or retaliation, supported by regular policy communication, employee awareness programmes, and leadership oversight to prevent discriminatory practices and ensure a safe, respectful, and inclusive workplace.</p>	<p>include counselling, training, warnings, role reassignment, or termination of employment. The company also undertakes corrective measures to restore fairness, strengthen controls, and prevent recurrence through policy reinforcement, capacity building, and management accountability.</p>
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Land & Resettlement



*Universal Declaration of Human Rights (UDHR, 1948), UN Declaration on the Rights of Indigenous Peoples (UNDRIP, 2007), ILO Convention 169 (Indigenous and Tribal Peoples, 1989), Art. 21: Right to life includes right to livelihood and healthy environment
 Art. 46: Protection of Scheduled Tribes and weaker sections.
 Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013 (LARR Act, 2013)*



At Hero Future Energies (HFE), we recognise that respecting community rights is central to responsible renewable energy development and to maintaining our social licence to operate. Communities in and around our project areas have the right to land, safe water, health, a clean environment, and meaningful participation in decisions that affect them. We respect the right of communities, particularly indigenous, tribal, and other vulnerable groups to ensure that no land acquisition, resettlement, or change in land use occurs without free, prior, and informed consent (FPIC), where applicable. Failure to respect these rights can result in social conflict, legal exposure, project delays, and long-term reputational risk.

While renewable energy projects contribute to climate mitigation, they may pose risks to communities if not managed responsibly. Land acquisition for solar and wind projects, substations, and transmission infrastructure can lead to loss of agricultural land, grazing areas, or common property resources, affecting livelihoods and traditional land-use patterns. Construction activities may generate dust, noise, traffic, and safety risks, while water use in water-stressed regions can affect access to safe water. Inadequate consultation, weak grievance mechanisms, or exclusion of communities from decision-making, particularly in tribal or forest-adjacent areas can increase marginalisation, conflict, and opposition to projects.

We therefore place community rights at the centre of our planning, construction, and operations. HFE is committed to respecting land and water rights, ensuring FPIC where applicable, preventing pollution and environmental degradation, and maintaining accessible and effective grievance mechanisms. By integrating community-rights considerations into project development and ongoing engagement, we aim to minimise adverse impacts, build trust, and contribute to the long-term wellbeing and resilience of the communities in which we operate.

Commitment	Detection & Prevention	Remediation
Hero Future Energies is committed to respecting community rights by ensuring inclusive engagement, protecting land and water resources, securing free, prior, and informed consent where applicable, and preventing adverse impacts across all stages of our operations.	Hero Future Energies approaches land rights for its renewable energy projects including wind, solar, and hybrid developments through a framework grounded in legal compliance, comprehensive assessment, and meaningful community engagement, with the aim of being “People Positive.” Land acquisition is managed through a mix of outright purchase and long-term lease arrangements, often in collaboration with state	In the event of any adverse impact on biodiversity, land rights, water access, or community livelihoods, HFE will implement a structured remediation process that includes: conducting a detailed impact re-assessment to confirm the nature, extent, and root cause of the issue; developing and executing an action plan to restore affected land and ecosystems, including re-vegetation with native species, soil stabilization, and habitat

	<p>authorities and local communities. Prior to project development, HFE undertakes assessments of land tenure, ownership, and land-use rights to identify and mitigate potential risks, and ensures adherence to applicable national and local regulations covering land acquisition as well as environmental, social, and safety requirements. Through ongoing engagement, HFE seeks to minimise disruption to livelihoods and create shared value, including enabling continued agricultural use of land by original landowners in wind project areas wherever feasible.</p>	<p>enhancement where disturbance has occurred; and working collaboratively with affected communities, landowners, and relevant authorities to agree on corrective measures, compensation where appropriate, and long-term monitoring to ensure recovery. The remediation plan will be aligned with applicable legal and regulatory requirements and guided by the mitigation hierarchy to first avoid, then minimize, and finally restore or offset impacts, with progress tracked through HFE’s environmental and social monitoring systems until closure of the issue is verified.</p>
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Occupational Health and Safety



ILO Convention 155 — Occupational Safety and Health Convention

ILO Convention 187 — Promotional Framework for Occupational Safety and Health Convention

ISO 45001 — Occupational Health and Safety Management, Factories Act



Employees



Workers



Suppliers

Occupational Health and Safety (OHS) is recognised as a fundamental human right and a salient issue for the renewable energy sector, where project development, construction, and operations expose workers to a range of physical, electrical, mechanical, environmental, and ergonomic risks. As the sector expands rapidly to support the energy transition, increasing project scale, geographic dispersion, and the use of advanced technologies heighten the importance of protecting both the physical and mental wellbeing of workers. Unsafe working conditions can result in serious injury, loss of life, social and economic harm, and project disruption, making robust OHS management a cornerstone of responsible business conduct and sustainable development.

For Hero Future Energies (HFE), with operations spanning wind, solar, and hybrid renewable energy projects across multiple geographies, the scope of OHS is diverse and complex. Construction and operations activities involve working at heights, electrical systems, heavy machinery, civil works, and exposure to extreme weather conditions, while transmission infrastructure and remote site locations add further safety challenges. Office and control-room environments also require attention to ergonomics, stress management, and mental wellbeing. The extensive use of contractors and subcontractors further underscores the need for consistent safety standards across the value chain.

Given its geographically dispersed projects and varied work environments, HFE faces the challenge of maintaining uniform safety standards while complying with region-specific regulatory requirements and addressing local risk conditions. As a result, OHS is not only a regulatory requirement for HFE but a strategic priority integral to operational excellence, workforce wellbeing, and long-term stakeholder trust.

Commitment	Detection & Prevention	Remediation
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<p>At Hero Future Energies (HFE), we are committed to embedding Occupational Health and Safety (OHS) as a non-negotiable priority across all operations, ensuring that every employee, contractor, and partner works in an environment where risks are rigorously assessed, hazards are controlled, and safety is upheld as the foundation of sustainable growth.</p>	<p>We have a standalone Occupational Health and Safety (OHS) Committee that oversees and enforces OHS policies, ensuring all workers and contractors are informed and that policies are routinely reviewed. This includes developing and supervising training programmes on OHS procedures, emergency response techniques, and risk mitigation measures, alongside conducting regular risk assessments to identify potential health and safety concerns.</p> <p>Additionally, we require our contractors and suppliers to adhere to the same stringent safety standards we uphold, with our principal contractors for operations and maintenance certified under ISO 9001:2008, ISO 45001:2018, and ISO 14001:2015, ensuring alignment with our operational safety principles.</p> <p>At HFE, strict enforcement of HSE policies and SOPs is non-negotiable, with each project site implementing a site-specific HSE plan aligned to our ESMS framework. No job proceeds without a risk assessment, and contractors are responsible for implementing and assessing identified hazards and controls, while HFE maintains oversight of occupational health, safety, and welfare. Hazard Identification and Risk Assessment (HIRA) and Job Safety Analysis (JSA) techniques are used to validate processes, with hazards classified according to Indian Standards (IS 3786) and OSHA guidelines. All employees and workers at construction and operational sites are provided with appropriate PPE, receive adequate training, and comply with applicable laws and statutes.</p> <p>Our Occupational Health and Safety Plan addresses all aspects of workplace risks, aiming to prevent injuries, illnesses, and fatalities by embedding safe behaviours and procedures. Complementing this, our Emergency Preparedness and Response Plan (EPRP) outlines arrangements for fire safety, medical response, hazardous material release, and natural calamities, ensuring effective collaboration with stakeholders and minimizing injury, damage, and loss.</p>	<p>At HFE, remediation in Occupational Health and Safety (OHS) begins immediately after an incident or risk is identified through monitoring, audits, or worker reporting. The first step is a thorough investigation to establish root causes, followed by corrective actions that address both immediate hazards and systemic gaps. Site OHS committees oversee the process, ensuring that injured workers receive appropriate medical care, support, and compensation, while contractors are required to participate in corrective measures under our ESMS framework. Findings are documented and escalated to senior management, with lessons learned integrated into updated site-specific HSE plans, revised SOPs, and enhanced training programmes. Hazard Identification and Risk Assessment (HIRA) and Job Safety Analysis (JSA) techniques are reapplied to validate the effectiveness of remediation, and performance indicators such as injury rates and near-misses are tracked to measure improvement. This cycle of investigation, corrective action, and continuous learning ensures that remediation strengthens prevention and reinforces HFE's commitment to safeguarding the health, safety, and welfare of all workers across project sites.</p>
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Freedom of Association and Collective Bargaining



ILO Convention 87 — Freedom of Association and Protection of the Right to Organise
ILO Convention 98 — Right to Organise and Collective Bargaining
UN Universal Declaration of Human Rights (UDHR) — Article 20 & 23
UN International Covenant on Civil and Political Rights (ICCPR) — Article 22
UN International Covenant on Economic, Social and Cultural Rights (ICESCR) — Article 8
UN Guiding Principles on Business and Human Rights (UNGPs)
Industrial Retaliation Codes, 2020, Industrial Disputes Act, 1947



Employees



Workers



Suppliers

Freedom of Association and Collective Bargaining are universally recognised labour rights and are particularly relevant in the renewable energy sector, where large-scale projects depend on collaboration between diverse workforces, contractors, and local communities. For HFE, these rights are critical to fostering workplace democracy, reducing power imbalances, and building trust across project sites that often operate in semi-urban and rural regions. Our workforce includes engineers, technicians, site workers, and contractors engaged in construction, operations, and maintenance of wind and solar plants, roles where collective representation helps address concerns around health and safety, working hours, fair treatment, and career progression. In addition, the renewable energy sector requires close engagement with local communities and supply chain partners, making sensitivity to regional socio-economic conditions essential. Upholding freedom of association and collective bargaining ensures that workers and contractors can raise concerns without fear of retaliation, strengthens industrial harmony, and mitigates risks of labour unrest or reputational damage. For HFE, respecting these rights is not only a legal obligation but also a cornerstone of responsible business conduct, enabling sustainable growth and reinforcing our role as a trusted partner in India’s clean energy transition.

Commitment	Detection & Prevention	Remediation
At Hero Future Energies (HFE), we are committed to upholding the universal right to Freedom of Association and Collective Bargaining, ensuring that all employees and contractors can freely form or join representative bodies, engage in dialogue, and raise workplace concerns without fear of retaliation. We view these rights as essential to fostering trust, reducing power imbalances, and strengthening collaboration across	Hero Future Energies (HFE) maintains a strong commitment to ethical business practices, including full respect for employees’ right to freedom of association and collective bargaining. To mitigate risks and prevent violations, HFE embeds these rights within its ESG management framework, ensuring that grievance mechanisms are accessible, transparent, and responsive to worker concerns. We proactively monitor workforce representation, reporting on the percentage of employees covered by independent trade unions or collective bargaining agreements, and engage in dialogue with worker representatives to strengthen trust and workplace democracy. Contractors and	At HFE, remediation of issues related to Freedom of Association and Collective Bargaining begins with prompt investigation whenever concerns are raised through grievance mechanisms, worker representatives, or site-level committees. The first step is to ensure that employees or contractors who report violations are protected from retaliation and that their concerns are documented transparently. Corrective actions are then implemented, which may include revising site-level policies, strengthening dialogue platforms, or addressing contractor non-compliance with our ESG standards. Where disputes arise, HFE facilitates structured engagement between management and worker

<p>our renewable energy projects, particularly in semi-urban and rural regions where diverse workforces and community engagement are central to our operations.</p>	<p>suppliers are required to uphold the same standards, aligning with our ethical business principles and reinforcing consistency across the value chain. By integrating these practices into recruitment, compensation, and operational policies, HFE reduces power imbalances, prevents retaliation, and fosters an environment where employees can raise concerns safely. This approach not only fulfils international standards and IFC requirements but also supports sustainable growth by ensuring harmonious industrial relations and safeguarding human rights across our renewable energy projects.</p>	<p>representatives to resolve grievances fairly and restore trust. Findings are escalated to senior management and integrated into our ESG management framework, ensuring lessons learned inform future practices. Contractors and suppliers are required to participate in remediation, aligning with our ethical business standards and IFC requirements, so that corrective measures extend across the value chain. By embedding remediation into our monitoring and reporting processes, HFE ensures that freedom of association is not only respected in principle but actively protected in practice, reinforcing workplace democracy and sustainable growth across our projects.</p>
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Water and Sanitation Facilities



WHO Guidelines on Sanitation and Health
WHO/UNICEF Joint Monitoring Programme (JMP) for Water Supply, Sanitation and Hygiene
ISO 30500 — Non-sewered sanitation systems — Prefabricated integrated treatment units
ISO 24510 — Activities relating to drinking water and wastewater services — Guidelines for service assessment and improvement
Factories Act, 1948



Employees



Workers



Suppliers

At Hero Future Energies (HFE), we believe that access to safe water, hygienic sanitation, and essential workplace facilities is fundamental to protecting health, dignity, and productivity. Providing clean drinking water, well-maintained toilets, and canteen facilities is not simply a compliance requirement, it reflects our commitment to creating a respectful and supportive environment where employees and contractors can thrive. These facilities reduce health risks, prevent absenteeism, and foster inclusion, particularly by ensuring that women and all workers have equal access to safe and hygienic amenities. For HFE, such measures are critical to operational excellence: they enable our workforce to focus on delivering renewable energy projects safely and efficiently, while reinforcing our values of equity, sustainability, and responsible business conduct. By embedding these provisions into our site-specific HSE plans, we demonstrate that basic needs are never overlooked but instead treated as the foundation of a safe and equitable workplace.

Commitment	Detection & Prevention	Remediation
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<p>We at Hero Future Energies (HFE) are committed to providing safe drinking water, hygienic toilets, and canteen facilities at all project sites, ensuring that basic workplace needs are never overlooked and form the foundation of dignity, health, and productivity.</p>	<p>To prevent risks and mitigate issues around access to safe water and sanitation, HFE integrates these essentials into its operational standards by ensuring clean drinking water stations, hygienic toilets, and canteen facilities are consistently available and maintained across all sites. Regular inspections, employee feedback mechanisms, and contractor compliance checks help identify gaps early, while proactive upgrades and training reinforce hygiene practices. This approach not only safeguards health and productivity but also strengthens workplace equity and trust by ensuring that basic needs are never overlooked.</p>	<p>In cases where deficiencies are identified, HFE initiates immediate corrective measures to restore safe and dignified conditions. This includes repairing or upgrading drinking water stations, ensuring toilets are cleaned and maintained, and addressing canteen hygiene or food safety concerns. Site-level HSE committees oversee the remediation, documenting issues and ensuring contractors comply with standards. Employees are engaged through feedback channels to validate improvements, while lessons learned are integrated into facility management protocols to prevent recurrence. By treating remediation as both corrective and preventive, HFE reinforces its commitment to health, equity, and operational excellence.</p>
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Migrant Worker Rights



ILO Convention No. 97
ILO Convention No. 143
ILO Declaration on Fundamental Principles and Rights at Work
UN International Convention on the Protection of the Rights of All Migrant Workers (1990)
Inter-State Migrant Workmen Act, 1979 (India)



Migrant labour rights are a salient issue for Hero Future Energies (HFE) given the nature of the renewable energy industry, which relies heavily on large-scale construction, installation, and maintenance activities. These operations often involve a significant proportion of contract and migrant workers, who are more vulnerable to risks such as wage disparities, lack of representation, unsafe working conditions, and limited access to grievance mechanisms. Ensuring fair treatment, safe facilities, and respect for freedom of association is therefore critical to maintaining operational integrity and aligning with international ESG standards. For HFE, protecting migrant workers is not only a compliance requirement but also a moral and strategic imperative that strengthens workforce trust and project sustainability.

The relevance of migrant labour rights becomes even sharper when contextualised to HFE’s operational footprint across Maharashtra, Rajasthan, Andhra Pradesh & Telangana, Delhi, Karnataka, and Tamil Nadu. These states present overlapping challenges: high reliance on contract labour in construction, risks of wage exploitation in informal labour markets, cultural and linguistic diversity that can hinder communication, and varying enforcement of labour laws. In industrial hubs like Maharashtra and Tamil Nadu, migrant workers may face housing and sanitation concerns, while in Rajasthan and Telangana, seasonal migration patterns can create instability in workforce continuity. Delhi and Karnataka add complexities of urban labour pressures and subcontracting practices. Together, these risks highlight the need for HFE to embed strong safeguards, covering fair wages, safe working conditions, grievance redressal, and representation—into its ESG framework to ensure migrant workers are treated with dignity and equity across all sites.

Commitment	Detection & Prevention	Remediation
Hero Future Energies (HFE) is committed to protecting the rights and dignity of migrant workers by ensuring fair wages, safe conditions, and access to basic facilities across all sites.	For Hero Future Energies (HFE), detection and prevention of risks to migrant labour rights are embedded into everyday operations. Regular audits, site inspections, and workforce surveys help identify early signs of wage exploitation, unsafe conditions, or lack of access to facilities. Preventive measures include strict contractor compliance checks, transparent wage systems, multilingual communication channels, and grievance mechanisms that ensure workers’ voices are heard. By combining proactive monitoring with strong preventive safeguards, HFE reduces vulnerabilities and	For Hero Future Energies (HFE), remediation of migrant labour rights issues is treated as an immediate and structured response. When violations or gaps are detected such as wage delays, unsafe conditions, or lack of access to facilities, HFE initiates corrective action through contractor accountability, rapid provision or repair of amenities, and direct engagement with affected workers. Site-level HSE committees document incidents, ensure compliance with labour laws, and track resolution timelines to restore safe and equitable conditions.

	builds a workplace culture where migrant workers' rights are consistently protected.	Remediation also extends beyond fixing the immediate issue: lessons learned are integrated into policies, contractor agreements, and monitoring systems to prevent recurrence. This approach reinforces HFE's commitment to dignity, fairness, and operational excellence, ensuring migrant workers' rights are consistently respected across all project sites.
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Annexure

Annexure 1: Description of Salient Human Rights risk identified as & Alignment with International standards

Human Rights Risks	Description	Stakeholders Affected	Standard Alignment
Child Labor & Young Workers	The right of every child to be protected from any form of work that is exploitative, hazardous, or inappropriate for their age, and that interferes with their education, health, physical development, mental well-being, or dignity. This right requires that children are not employed below the legally defined minimum working age and are never engaged in the worst forms of child labor, including work that exposes them to dangerous conditions, chemicals, or excessive working hours.	Employees Workers Suppliers Community	ILO Conventions No. 97 & 143 – Protect migrant workers’ rights and promote equality UN Convention on Migrant Workers (1990) Comprehensive rights framework Inter-State Migrant Workmen Act, 1979 [u/s 13, 14, 15 and 16] – Regulates recruitment and working conditions. Building and Other Construction Workers Act, 1996 – Welfare boards for construction workers
Force Labour/ Human Trafficking	The right of all individuals to freely choose their employment and to perform work without coercion, threats, violence, deception, debt bondage, or abuse of power. Forced labor occurs when a person is compelled to work under the threat of penalty or when their ability to leave employment is restricted	Employees Workers Suppliers Community	ILO Convention 29 — Forced Labour Convention ILO Convention 105 — Abolition of Forced Labour Convention UN International Covenant on Civil and

	through practices such as retention of identity documents, non-payment of wages, recruitment debt, intimidation, or state-imposed labor schemes		<p>Political Rights (ICCPR)</p> <p>UN Guiding Principles on Business and Human Rights (UNGPs)</p> <p>Bonded Labour System (Abolition) Act, 1976</p> <p>Indian Penal Code (IPC) — Sections on trafficking, forced labour, wrongful confinement</p> <p>Trafficking of Persons (Prevention, Protection and Rehabilitation) Act (draft legislation)</p> <p>Inter-State Migrant Workmen (Regulation of Employment and Conditions of Service) Act, 1979</p> <p>Contract Labour (Regulation and Abolition) Act, 1970</p>
Health & Safety	The right of all workers to carry out their work in an environment that prevents occupational injuries, illnesses, and fatalities, and that actively safeguards their physical and mental health. This includes the employer’s responsibility to identify and mitigate workplace hazards, provide adequate training, personal protective equipment, emergency	<p>Employees</p> <p>Workers</p> <p>Suppliers</p>	<p>ILO Convention 155 — Occupational Safety and Health Convention</p> <p>ILO Convention 187 — Promotional Framework for Occupational Safety and Health Convention</p>

	preparedness, and ensure that safety standards are applied consistently across all operations, including contractors and subcontractors.		<p>ISO 45001 — Occupational Health and Safety Management Systems</p> <p>Occupational Safety, Health and Working Conditions Code, 2020</p> <p>Factories Act, 1948</p> <p>Employee State Insurance Act, 1948 (ESI Act)</p>
Facility & Sanitation Practices	Guarantees access to basic facilities such as clean toilets, potable water, and safe meal areas. Facilities such as ensuring special protections for new, expectant, and nursing mothers. (eg- Childcare, Breastfeeding)	<p>Employees</p> <p>Workers</p> <p>Suppliers</p>	<p>WHO Guidelines on Sanitation and Health</p> <p>WHO/UNICEF Joint Monitoring Programme (JMP) for Water Supply, Sanitation and Hygiene</p> <p>ISO 30500 — Non-sewered sanitation systems — Prefabricated integrated treatment units</p> <p>ISO 24510 — Activities relating to drinking water and wastewater services — Guidelines for service assessment and improvement</p> <p>UN Sustainable Development Goal 6 (SDG 6) — Clean Water and Sanitation</p>
Freedom Of Association	The right of workers to freely form, join, or refrain from joining organizations of their own choosing, such as trade unions, and to engage	<p>Employees</p> <p>Workers</p>	<p>ILO Convention 87 — Freedom of Association and Protection of the Right to Organise</p>

	<p>in collective bargaining without fear of discrimination, retaliation, or interference. This right requires employers to respect worker representation, enable dialogue on working conditions, and provide accessible mechanisms for raising concerns and resolving disputes.</p>	Suppliers	<p>ILO Convention 98 — Right to Organise and Collective Bargaining</p> <p>UN Universal Declaration of Human Rights (UDHR) — Article 20 & 23</p> <p>UN International Covenant on Civil and Political Rights (ICCPR) — Article 22</p> <p>UN International Covenant on Economic, Social and Cultural Rights (ICESCR) — Article 8</p> <p>UN Guiding Principles on Business and Human Rights (UNGPs)</p> <p>Trade Unions Act, 1926</p> <p>Industrial Relations Code, 2020</p> <p>Industrial Disputes Act, 1947 (partially replaced by the IR Code)</p> <p>Factories Act, 1948 (worker representation provisions)</p>
Discrimination	<p>Non-discrimination means ensuring that all personnel are treated fairly and equally in hiring, pay, training, promotion, and</p>	Employees Workers	<p>ILO Convention 111 - Discrimination in employment and occupation</p>

	<p>separation, without bias based on identity, status, or personal conditions. It requires respecting employees' rights to practice their beliefs, prohibiting any form of abusive, exploitative, or sexually coercive behaviour, and ensuring no intrusive practices occur in the workplace or associated facilities.</p>	Suppliers	<p>ILO Convention 100- Equal remuneration</p> <p>UN Universal Declaration of Human Rights (UDHR) — Article 2 & 23</p> <p>Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) - Article 11</p> <p>Constitution (Article 15 and 16)</p> <p>Sexual Harassment of Women at Workplace Act, 2013</p> <p>Equal Remuneration Act, 1976</p> <p>Rights of Persons with Disabilities Act, 2016</p> <p>Transgender Persons (Protection of Rights) Act, 2019).</p>
Working Hours	<p>Working hours standards require the organisation to comply with all laws, industry norms, and applicable collective bargaining agreements, ensuring that the regular workweek does not exceed 48 hours, personnel receive at least one day off after six consecutive days of work, and overtime is voluntary, limited, and not regularly requested except where a freely negotiated collective</p>	<p>Employees</p> <p>Workers</p> <p>Suppliers</p>	<p>ILO Convention 1 - the Hours of Work (Industry)</p> <p>ILO Convention 14- Weekly Rest (Industry) Convention</p> <p>ILO Convention 132- Holidays with Pay Convention (Revised)</p>

	bargaining agreement permits short-term, lawful exceptions.		International Covenant on Economic, Social and Cultural Rights (ICESCR) - Article 6-8 Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) - Article 11
Minimum Wages	"The remuneration received for a standard work week by a worker in a particular place sufficient to afford a decent standard of living for the worker and her or his family. Elements of a decent standard of living include food, water, housing, education, health care, transport, clothing, and other essential needs including provision for unexpected events.	Employees Workers Suppliers	ILO Convention 131- Minimum Wage Fixing Convention ILO Convention 173- Protection of Workers' Claims (Employer's Insolvency) Convention ILO Convention 100- Equal Remuneration Convention ILO Convention No. 95 – Protection of Wages (1949) ILO Convention No. 100 - Equal Remuneration, 1951 ILO Convention No. 131 - Minimum Wage Fixing Convention, 1970
Community Rights	The right of individuals, communities, and Indigenous peoples to own, use, develop, and control their land, territories, and natural	Community	ILO Convention No. 169 – Indigenous and Tribal Peoples

	resources, and to be protected from forced eviction or displacement. This includes the right to Free, Prior, and Informed Consent (FPIC) before any project affecting their land or livelihoods is approved, as well as the right to fair compensation, livelihood restoration, and culturally appropriate engagement.		Forest Rights Act, 2006 - Section 3(1)(i): Community rights to protect, regenerate, or manage forest resources.
Right to Healthy Environment	The right of present and future generations to live in an environment that is clean, healthy, safe, and sustainable, and that supports human health, dignity, and livelihoods. This right requires the prevention of environmental harm, responsible use of natural resources, effective management of waste and emissions, protection of biodiversity, and avoidance of environmental impacts that disproportionately affect vulnerable communities.	Employees Workers Suppliers Consumers	UN recognition of the right to a healthy environment ICESCR UNGPs Environmental protection laws Water use and waste management regulations
Migrant Worker Exploitation	Communities' rights to land require that no dispossession or change in land use occurs without their free, prior, and informed consent (FPIC). Communities also have the right to safe water and to be protected from pollution or environmental practices that endanger their health and wellbeing.	Workers Suppliers	ILO Conventions No. 97 & 143 – Protect migrant workers' rights and promote equality UN Convention on Migrant Workers (1990) – Comprehensive rights framework Inter-State Migrant Workmen Act, 1979 [u/s 13, 14, 15 and 16] – Regulates recruitment and working conditions. Building and Other Construction Workers

			Act, 1996 – Welfare boards for construction workers
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Annexure 2 : Salience Human Rights Risk Assessment Criteria

The following table outlines the assessment rubric used to evaluate salient human rights risks. It defines the criteria and thresholds applied for determining scope, scale, remediability, and likelihood, which collectively inform the salience prioritisation:

Parameter	Definition	Legend
Scope	How many people could be affected	Very Small: Less than 5% of the population
		Small: 5-20% of the population
		Medium: 21-90% of the population
		Large: 91-100% of the population
Scale	How serious would the impacts be for the victim	Minor: Unlikely to cause bodily harm
		Moderate: Could result in indirect bodily harm
		Significant: Likely to result in direct bodily harm
		Extreme: May result in death or irreversible loss
Remediability	Will a remedy restore the victim to the same or equivalent position	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 into the same or equivalent condition before the 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 right 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 is more probable than not that the impacts on rights holders may occur considering countries contexts and business relationships

		Very likely: Currently occurring or high likelihood that the impacts on rights holders may occur considering countries context and business relationships
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