

Clearway 2020 ESG Report

Global Reporting Initiative (GRI) Index

These disclosures pertain to Clearway's 2020 ESG report, which is available at www.clearwayenergygroup.com/sustainability/.

General Disclosures

STANDARD NUMBER	DESCRIPTION	RESPONSE
ORGANIZATIONAL PROFILE		
102-1	Name of the organization	Clearway Energy Group LLC and our public affiliate Clearway Energy, Inc., collectively "Clearway." Where specified, selected information pertains solely to either Clearway Energy Group LLC or Clearway Energy, Inc.
102-2	Activities, brands, products, and services	About Clearway (p. 5)
102-3	Location of headquarters	Clearway Energy Group LLC is headquartered in San Francisco, CA. Our public affiliate Clearway Energy, Inc. is headquartered in Princeton, NJ. The companies share corporate offices in Carlsbad, CA, Scottsdale, AZ and Houston, TX and also have several site-based offices.
102-4	Location of operations	United States
102-5	Ownership and legal form	About Clearway (p. 5)
102-6	Markets served	Our Projects Clearway Community Solar Our Business Activities (p. 14)
102-7	Scale of the organization	About Clearway Our Projects About Clearway (p. 5) Our Business Activities (p. 14) Our People (p. 28)
102-8	Information on employees and other workers	Clearway Energy Group LLC and Clearway Energy, Inc. share multiple departments. Together, the two companies have more than 900 employees spread across five corporate offices as well as our site locations, all of which are in the U.S. Our team offers a diverse range of experience, including leaders in the solar, wind, and thermal energy industries, engineers, project developers and investment specialists, as well as experts in environmental issues, permitting, interconnection, transmission and power plant operations.
102-9	Description of supply chain	Supply Chain (p. 34)
102-10	Significant changes to the organization and its supply chain	In 2020, there were no significant changes to Clearway's organizational structure, ownership, or supply chain. However, our organization did increase in size in 2020, growing from 879 employees to 918 employees.
102-11	Precautionary principle or approach	Clearway's mission and business model align with the precautionary principle, and our environmental practices are aligned with ISO 14001 standards. We rely on a robust set of criteria when determining the potential impact of our activities. Assessments are performed in the course of siting and permitting new developments, as part of the evaluation of proposed expansions or introduction of new activities to existing sites, and in the context of due diligence for new acquisitions.
102-12	External initiatives	Industry Leadership Supply Chain (p. 34) Environmental Stewardship (p. 37) Industry Leadership (p. 42)
102-13	Membership in associations	In keeping with our commitment to expand the production and use of renewable energy, Clearway maintains active memberships in industry trade associations. Where appropriate, we seek to play a leadership role and to leverage associations' resources to advance initiatives that will make our industry more sustainable.

STANDARD NUMBER	DESCRIPTION	RESPONSE
STRATEGY		
102-14	Statement from senior decision-maker	Message from Our CEOs (p. 1)
102-15	Key impacts, risks and opportunities	<p>Clearway is one of the largest developers, owners, and operators of clean energy in the U.S. with 5 GW of wind, solar, and energy storage, and district energy systems in operation in more than 25 states and Puerto Rico. As such, our biggest impact is the displacement of fossil-fuel fired generation and corresponding reductions in greenhouse gas emissions.</p> <p>Growing concern about the impacts of climate change and increased demand for clean energy production, as well as a heightened awareness of the importance of sustainability, present significant opportunities for our industry and our company. However, the energy industry is highly regulated and policy changes have the potential to affect our business activities.</p> <p>Our commitment to our stakeholders is that we will conduct our business in an ethical and responsible manner that conserves our shared resources and creates a better future. Our mission is to produce clean, reliable, competitively priced renewable energy. We strive to do right by, and generate benefits for, our customers, our communities, our environment, and our people.</p>
ETHICS & INTEGRITY		
102-16	Values, principles, standards, and norms of behavior	<p>Our Vision & Values About Clearway (p. 5)</p> <p>Clearway is committed to sustainability in all aspects of our operations and governance. We are guided by our operating principles, in conjunction with a robust framework of policies that ensure our actions are fair, balanced, and ethical.</p>
102-17	Mechanisms for advice and concerns about ethics	<p>Governance Governance (p. 43)</p> <p>Clearway considers ethics and accountability to be of the utmost importance. Our Codes of Conduct and Supplier Codes of Conduct address ethics matters and expectations. New employees and subcontractors receive training on these Codes, and we require that all employees acknowledge the company Codes of Conduct annually. In addition, we encourage employees to bring concerns to their supervisor, our General Counsels, or the Vice President of Human Resources. We also offer a telephonic Ethics Helpline and a web-based Ethics Alertline, which are available 24 hours a day, seven days a week. They are administered by an outside company to ensure confidentiality and anonymity, if desired. Calls are not traced or recorded, and the company does not keep any identifiable information regarding the sender of an online communication. All legitimate concerns are objectively investigated and, where appropriate, remedial measures are taken. We prohibit retaliation of any kind against individuals who report concerns in good faith.</p>
GOVERNANCE		
102-18	Governance structure	<p>Governance</p> <p>Clearway Energy Group LLC (CEG) is governed by a Board of Directors comprised of 6 individuals and chaired by Jonathan Bram, a founding partner of CEG's parent company GIP who serves on GIP's Investment and Operating Committees. CEG's purpose, values, and strategy are determined by the Board of Directors and our leadership. Information on Clearway Energy, Inc.'s governance may be found on their website.</p>
102-20	Executive-level responsibility for economic, environmental, and social topics	<p>Governance</p> <p>Clearway's leadership teams are comprised of executives and department heads that have extensive experience across their specific disciplines as well as deep expertise in the renewable energy and thermal industries. Every individual brings knowledge, perspective, and an innovative mindset to our initiatives and goals. The leadership teams meet regularly to discuss the company's business and report any issues that may have arisen.</p> <p>The decision to report on our ESG performance was initiated by our CEOs in coordination with our Boards of Directors, and they reviewed and approved this report prior to its release. They invited our leadership teams to undertake the task of delivering this report and reviewed and approved it prior to its release.</p>
102-21	Consulting stakeholders on economic, environmental, and social topics	<p>Clearway Energy Group works closely with property owners, local government, utilities, state and federal environmental agencies, qualified technical consultants, and other stakeholders to ensure our projects are responsibly sited, developed, constructed, and operated. During the project development phase, we may host or attend neighborhood "town halls" to share project details and discuss concerns with local residents. We work with experts in environmental and cultural resources to identify protected species.</p> <p>Most of our projects require public hearings and permits issued by town councils or county supervisors, who take the economic benefits from our projects (increased tax revenue and the creation of construction and operations jobs) into consideration when determining if this type of development is appropriate for their community.</p>

STANDARD NUMBER	DESCRIPTION	RESPONSE
102-22	Composition of the highest governance body and its committees	Governance
102-23	Chair of the highest governance body	Jonathan Bram Governance
102-25	Conflicts of interest	Clearway commits to making business decisions based upon the best interest of our company, and not allow these decisions to be influenced by personal considerations. Our company Codes of Conduct discuss the potential for conflicts of interest or the appearance thereof, and provide clear guidelines for how employees and our suppliers should avoid or report such conflicts.
102-26	Role of highest governance body in setting purpose, values, and strategy	Governance
102-27	Collective knowledge of highest governance body	Our Leadership
102-30	Effectiveness of risk management processes	Clearway's Boards of Directors and senior management facilitate the effective management of risk through proper organizational structure and reporting relationships; demands for timely and meaningful performance, compliance and risk reporting; and by integrating themselves into an appropriate governance hierarchy regarding risk issues.
102-32	Highest governance body's role in sustainability reporting	Board of Directors The decision to report on our ESG performance was initiated by our CEOs in coordination with our Boards of Directors, and they reviewed and approved this report prior to its release. They invited our leadership team to undertake the task of delivering this report and reviewed and approved it prior to its release.
102-33	Communicating critical concerns	Governance
102-34	Nature and total number of critical concerns	Climate Change Analysis Climate Change Analysis (p. 40) Governance (p. 43) Risks to the long-term viability of Clearway's business include climate change and its impacts on weather patterns, the availability and price of major project components like wind turbines, solar panels, and batteries, as well as future price trends and technological advances related to those components. The international, national and state-level policy and regulatory landscape also has the potential to impact our business. Risks to the viability of specific projects include changes to incentives, laws, regulations, and statutes, as well as the ability to interconnect to the regional electric grid and the availability of capacity on the transmission lines used to deliver the electricity produced from our sites to end users.

STAKEHOLDER ENGAGEMENT

102-40	List of stakeholder groups	Internal <ul style="list-style-type: none"> • Employees External <ul style="list-style-type: none"> • Project lenders and equity investors • Customers and off-takers • Vendors and suppliers • Insurers and guarantors • Participating landowners • Non-participating landowners • Project area communities • Federal, regional, and local governments • Permitting authorities • Regulators and government agencies • Industry associations • Non-governmental organizations • Industry subject matter experts and academics
102-43	Approach to stakeholder engagement	Our Partners Clearway Energy Group's development, construction, operations and maintenance, and asset management teams engage with our stakeholders on a regular basis. We tailor our development, construction, and maintenance practices to align with our priorities of protecting natural resources and creating positive and lasting relationships with our projects' landowners and neighbors.

STANDARD NUMBER	DESCRIPTION	RESPONSE
REPORTING PRACTICE		
102-46	Report content and topic boundaries	<p>About This Report (p. 4)</p> <p>This report describes the environmental, social, and governance aspects of the activities of Clearway Energy Group LLC and our public affiliate Clearway Energy, Inc. (collectively, "Clearway") for fiscal year 2020 (January 1 – December 31, 2020). Topics related to Clearway's portfolio are primarily focused on the renewable energy assets we own and operate.</p>
102-47	List of material topics	<p>In 2019 Clearway conducted a materiality survey, which identified 46 topics that are relevant for us to report on and address in our sustainability efforts. The resulting materiality matrix is included in our 2019 report. It is our intention that our next materiality survey will inform our 2022 report.</p>
102-48	Restatements of information	<p>About This Report (p. 4)</p> <p>None</p>
102-49	Changes in reporting	<p>About This Report (p. 4)</p> <p>This report differs from Clearway Energy Group's 2019 report in that it includes additional information that pertains to Clearway Energy, Inc. Where specified, selected information pertains solely to either Clearway Energy Group LLC or to Clearway Energy, Inc.</p>
102-50	Reporting period	Calendar year 2020
102-51	Date of most recent report	Clearway Energy Group's 2019 sustainability report was released in May, 2020.
102-52	Reporting cycle	Annual
102-53	Contact point for questions regarding the report	<p>Zadie Oleksiw, Director, Communications zadie.oleksiw@clearwayenergy.com</p>
102-54	Claims of reporting in accordance with the GRI Standards	This report references GRI disclosures, but it is not in accordance with the GRI reporting standards.
102-55	GRI content index	This is the GRI content index.
102-56	External assurance	About This Report (p. 4)
103-2	The management approach and its components	<p>We strive to create an inclusive environment considerate of all employees, and to nurture a culture that aligns with our values. We uphold fair employment practices and are committed to complying with all applicable laws pertaining to freedom of association, privacy, immigration, working time, wages, and hours.</p>
EU1	Installed capacity, broken down by primary energy source and by regulatory regime	<p>Our Business Activities (p. 14)</p> <p>As of December 31, 2020, Clearway Energy Group LLC and Clearway Energy, Inc. own and operate more than 7.5 GW of renewable and conventional energy assets as well as district energy systems across the country. Approximately 5 GW of this capacity is comprised of wind, solar, and energy storage assets.</p>

Specific Standard Disclosures

STANDARD NUMBER	DESCRIPTION	RESPONSE
EU SECTOR TOPIC: AVAILABILITY AND RELIABILITY		
EU10	Planned capacity against projected electricity demand over the long term, broken down by energy source and regulatory regime	Our Business Activities (p. 14) Clearway Energy Group has a 10 GW development pipeline of wind, solar, and energy storage projects. In 2020, we signed 1.2 GW of new renewable power purchase agreements related to projects in the development pipeline.
INDIRECT ECONOMIC IMPACTS		
203-2	Significant indirect economic impacts	Corporate Citizenship (p. 11) In 2020, the sites owned and operated by Clearway contributed \$35.4 million in property taxes and \$12.6 million in landowner payments to their host communities.
ANTI-CORRUPTION		
205-1	Operations assessed for risks related to corruption	<u>Governance</u> Governance (p. 43) In 2020, Clearway Energy Group implemented a formal risk management system to document and track risks at the enterprise level. This process involves identifying potential risks across a range of categories, assessing their causes, possible consequences and appropriate mitigants.
205-2	Communication and training about anti-corruption policies and procedures	<u>Governance</u> Governance (p. 43) Clearway's Codes of Conduct serve as the foundation for our ethical business culture, and employees are required to acknowledge receipt on an annual basis. In addition, our risk management policies provide our risk control framework, including financial controls necessary to ensure compliance with internal and external requirements, and employees who work with financial data are required to acknowledge they understand these policies.
205-3	Confirmed incidents of corruption and actions taken	Clearway does not engage in bribery, kickbacks or other acts of corruption. We're scrupulous in our business dealings and even more careful in our interactions with public or government officials. We are committed to complying with all applicable laws and regulations governing political activities and communications, including accurate reporting of lobbying activities, campaign contributions and gifts to public officials. We strictly comply with the letter and spirit of all applicable antibribery and anticorruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA). In 2020, there were no incidents of corruption identified within our organization.
ANTI-COMPETITIVE BEHAVIOR		
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Clearway is committed to competing lawfully based upon the merits of our products and services. We comply fully with antitrust and competition laws everywhere we engage in business. These laws vary from country to country, but in general, they protect consumers by prohibiting competitors from acting together to control prices or reducing competition. In 2020, there were no incidents of, or legal actions taken against us, for anti-competitive behavior, anti-trust, or monopoly practices.
WATER & EFFLUENTS		
303-1	Interactions with water as a shared resource	Wind and PV solar energy sites do not consume water to generate power. This means the renewable generation assets Clearway owns and operates do not divert scarce surface or groundwater supplies away from use for agriculture, drinking water or sanitation. The remote locations of most of our sites mean they do not have the convenience of city/urban water infrastructure. Our sites typically use groundwater wells with withdrawal rates that are permitted by local authorities and often set as part of our land use agreements. Several of these sites have poor water quality and require additional point-of-use treatment systems. Consumption is tracked by onsite meters, and wastewater is discharged onsite through wastewater systems. Sites that do not have groundwater wells obtain water from local agencies. As such, water use at our sites is minimal and is generally limited to the needs of site staff, basic landscaping, periodic washing of solar panels and dust control, and additional water management objectives for these uses are being developed. The remainder of our water consumption occurs at our corporate offices which are in buildings shared by other occupants, so we are not able to quantify the amount of water used by our office activities. We do not have any water use reduction goals for our offices at this time.

STANDARD NUMBER	DESCRIPTION	RESPONSE
303-2	Management of water discharge-related impacts	Clearway's storm water and wastewater management policies comply with federal, state, and local regulations, and are designed to minimize impacts to the natural environment and the communities that surround our project sites. Clearway Energy Group does not use water for any of its industrial processes, and so no discharge permits were required.
303-4	Water discharge	Clearway renewable energy sites with operations and maintenance buildings discharge water to the local aquifer after it passes through an approved onsite wastewater system comprised of a septic tank and drain field. None of our these sites discharge water to bodies of freshwater, seawater or surface water. In 2020, we tracked water discharge at 44% of these sites, and it totaled 1,318,645 gallons.
303-5	Water consumption	Environmental Stewardship (p. 37) Water consumption at Clearway's corporate offices occurs in buildings shared by other occupants, so we are not able to quantify our use. Water use at our renewable energy sites is minimal and is generally limited to the needs of site staff, basic landscaping, dust control and periodic rinsing of solar panels so the modules can produce the maximum amount of clean energy. Several of these sites do not have the ability to track water consumption and we continue to work with these sites to collect this data. In 2020, we tracked water usage at 51% of these sites, which totaled 1,090,502 gallons.

BIODIVERSITY

304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	<u>Environmental Stewardship</u> Whenever possible, Clearway's renewable energy sites are located outside of protected lands or areas with high biodiversity value, but a few of our wind farms have the potential to directly affect protected species, including California condors, bald eagles, golden eagles, whooping cranes and bats (including hoary, Indiana, big brown, eastern red and tricolor bats). In addition, some of our sites in the Midwest lie within or near a 200-mile wide migratory corridor used by the Aransas-Wood Buffalo population of whooping cranes, which winter in the Aransas National Wildlife Refuge in southeast Texas and migrate to Wood Buffalo National Park in Alberta, Canada to nest. In keeping with our commitment to preserve and protect biodiversity and avoid harming wildlife, we implement rigorous biomonitoring and curtailment protocols at sites that could impact these species. Some of our California solar sites are on land that includes Western burrowing owl habitat. Wildlife corridors for these owls are maintained by creating small openings in the bottom of security fences at our solar sites.
304-2	Significant impacts of activities, products, and services on biodiversity	<u>Environmental Stewardship</u>
304-3	Habitats protected or restored	<u>Environmental Stewardship</u>
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk	Bald eagle (<i>Haliaeetus leucocephalus</i>) – Bald and Golden Eagle Protection Act Black-capped vireo (<i>Vireo atricapilla</i>) – Vulnerable California condor (<i>Gymnogyps californianus</i>) – Endangered Giant kangaroo rat (<i>Dipodomys ingens</i>) – Endangered Golden eagle (<i>Aquila chrysaetos</i>) – Bald and Golden Eagle Protection Act Indiana bat (<i>Myotis sodalis</i>) – Endangered San Joaquin kit fox (<i>Vulpes macrotis mutica</i>) – Endangered Swainson's hawk (<i>Buteo swainsoni</i>) – Threatened Tricolored bat (<i>Perimyotis subflavus</i>) – Under Review Utah prairie dog (<i>Cynomys parvidens</i>) – Threatened Western burrowing owl (<i>Athene cucularia hypugaea</i>) – Species of Concern Whooping crane (<i>Grus americana</i>) – Endangered

WASTE

306-2	Waste by type and disposal method	In 2020 Clearway Energy Group expanded its capability to track waste generation at the site level, and we are now able to report on 62% of our sites. These sites generated a total of 851,400 pounds of non-hazardous waste in 2020. The waste consisted of discarded photovoltaic solar modules, used industrial oils, oil filters and oil-contaminated materials. The portion of the waste diverted to recycling sites consisted of 252,000 pounds, while the remaining 599,400 pounds were disposed of in a permitted landfill. We did not dispose of any hazardous waste, nor did we have any Notices of Violation from local, county or state agencies, a noteworthy accomplishment given that we have 400+ sites operating in 26 states.
306-3	Significant spills	In 2020, our California Valley Solar Ranch and South Trent Wind sites each had one pad mount transformer failure which resulted in a reportable quantity of transformer fluid being released into the environment. In both instances the spills were cleaned up in accordance with local, state and federal law.
306-4	Transport of hazardous waste	Clearway Energy Group did not dispose of any hazardous waste in 2020.

STANDARD NUMBER	DESCRIPTION	RESPONSE
ENVIRONMENTAL COMPLIANCE		
307-1	Non-compliance with environmental laws and regulations	In 2020, Clearway did not have any instances of non-compliance with laws or regulations that resulted in significant fines or non-monetary penalties for non-compliance.
SUPPLIER ENVIRONMENTAL ASSESSMENT		
308-1	Percentage of new suppliers that were screened using environmental criteria	100% of Clearway's new suppliers are screened through either our Technology Business Council process or the vendor qualification program, depending on the type of goods or services they provide. Both of these screening processes examine environmental impacts.
EMPLOYMENT		
401-1	New employee hires and employee turnover	In 2020, Clearway welcomed 167 new team members to the organization across a variety of locations, roles, levels, and functions. Across the Clearway enterprise, voluntary turnover was 10.3% during 2020.
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Clearway offers all regular full-time and part-time employees working at least 20 hours per week the ability to select from a comprehensive menu of benefits to meet their needs and those of their dependents. Our offerings include medical, dental and vision care, HSAs with company contributions, health FSAs, dependent daycare FSAs, commuter benefits, and a 401(k) plan with an employer match. We also provide company-paid life, AD&D and disability coverage, and employees can voluntarily purchase additional coverage for themselves and their dependents as needed. In addition to these standard benefits, we provide a variety of supplemental offerings, including back-up childcare, legal services, pet insurance, accidental/cancer/critical illness/hospital insurance, a diabetes support program, and matching donations to eligible charities. For our employees who are welcoming new additions to their family, Clearway offers full-time employees a generous parental leave program and adoption assistance benefits. Part-time and temporary employees, as well as full-time employees and their household members, can utilize our employee assistance program for support with personal problems and/or work-related problems that may impact their job performance, health, mental and emotional wellbeing.
401-3	Parental leave	Clearway offers parental leave to full-time employees so that they can bond with a new child. In 2020, 811 male employees and 216 female employees were entitled to parental leave; 28 male employees and 9 female employees used this benefit. Clearway's return-to-work and retention rate is 100%, as all employees who took parental leave in 2019 and returned to work were still employed 12 months after their return.
OCCUPATIONAL HEALTH & SAFETY		
403-1	Occupational health and safety management system	Clearway policies and procedures related to health and safety are based on the ISO 45001 standards. Our Safety Management System captures information associated with all incidents that involve injuries, accidents, near misses and unsafe conditions. This information then drives a heightened level of safety responsibility and incident prevention among management, supervision and front-line employees.
403-2	Hazard identification, risk assessment, and incident investigation	Clearway employees perform job hazard assessments and pre-job briefings prior to each work activity to ensure hazards are identified, risks are evaluated and mitigated to the lowest practicable level, and these hazards and risks are communicated to all members of the work party. Any accidents or injuries are investigated to identify causal factors and to develop and implement corrective actions to prevent recurrence.
403-3	Occupational health services	Clearway maintains strict confidentiality regarding our employees' personal health related information; this information and any employee's participation in any occupational health services is not used for any favorable or unfavorable treatment.
403-4	Worker participation, consultation, and communication on occupational health and safety	Clearway benefits from employee participation in our safety and training committees, which comprise both supervisory and front-line employees who review and provide input into our safety and training programs. Injury and significant incident information is communicated to all employees through safety alerts, which are sent out via e-mail in addition to being discussed during weekly management and front-line meetings. We train our employees in peer-to-peer coaching to successfully address unsafe behaviors before an injury, accident or near-miss occurs.

STANDARD NUMBER	DESCRIPTION	RESPONSE
403-5	Worker training on occupational health and safety	Clearway employees are trained in applicable environmental and safety regulatory standards (e.g. OSHA and EPA standards) on an annual basis. This instruction is provided via classroom, computer-based and hands-on training (since the onset of the COVID-19 pandemic, the majority of this training has been conducted virtually). Managers and front-line employees are trained in incident investigation techniques and root cause identification. Incident investigations and the identification of causal factors help to identify corrective actions that drive continual improvement.
403-9	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	Our Safety Metrics (p. 32) Data is for Clearway Energy Group (CEG) operations and maintenance employees and contractors under day-to-day direction from CEG: Worker Hours - 1,275,740 OSHA Recordable Injuries - 5 Total OSHA Recordable Injury Rate - 0.78 Fatalities - 0 Lost Time Injuries - 3 Lost Time Injury Rate - 0.47 Days Away/Restricted Duty or Transfer Injuries - 3 DART Rate - 0.47 First Aid Injuries - 17
EU-LA6	Report on health and safety performance of contractors & subcontractors working onsite or on behalf of the reporting organization offsite	Clearway utilizes a contractor review and qualification process to ensure high levels of safety performance. Clearway Energy Group's construction team monitors contractor safety performance on sites and conducts regular observations to ensure safety compliance. Contractors also report onsite safety performance during regularly scheduled plan-of-the-day meetings.
EU-18	% of contractor & subcontractor employees that have undergone relevant health & safety training	100% of contractor and subcontractor employees working under the direction of Clearway are required to undergo health and safety training relevant to the tasks and responsibilities associated with their positions.

TRAINING & EDUCATION

404-1	Average hours of training per year per employee	In 2020, the training department issued more than 23,000 learning assignments to more than 1,100 Clearway employees with an 87% completion rate. Approximately 11,500 of these assignments were compliance-related training for site personnel, and these were completed at a rate of 97%, with 26 of our sites achieving 100% completion. Across the Clearway enterprise, employees received an average of 12.7 hours of training in 2020.
404-2	Programs for upgrading employee skills and transition assistance programs	All staff and contractors working under the direction of Clearway undergo training to carry out the environmental health and safety (EHS) responsibilities associated with their positions. Third-party contractors are required to have their own EHS training programs that assure the safety of their personnel and compliance with all legal requirements. In some cases, we may share our EHS training program with third parties to help align program expectations and best practices. We've developed a learning management system to assign and track EHS training based on employee start date and annual training requirements to ensure all employees have the skills necessary to do their job and have opportunities to refresh those skills in a timely manner.
404-3	Percentage of employees receiving regular performance and career development reviews	100% of all full-time permanent employees at Clearway receive an end-of-year performance review. Employees who join the organization in Q4 may receive a simplified new hire performance review depending on their date of hire.
EU DMA	Programs to ensure availability of skilled workforce	In keeping with our commitment to continuous improvement, Clearway uses annual surveys and input from our training committee to continue to adapt our training program to fit the needs of our customers and ensure compliance with regulatory agencies in areas such as safety, protecting the environment, legal and human resource issues, and technical topics. In addition, we offer a range of internal training programs to enhance employees' skills in topics like management, leadership, and communication.

STANDARD NUMBER	DESCRIPTION	RESPONSE
DIVERSITY		
405-1	Diversity of governance bodies and employees	<p>Our Diversity Metrics (p. 30)</p> <p>Diversity data for Clearway as of December 31, 2020, is as follows:</p> <p>Governance Bodies: Clearway's two governing bodies are made up of 11 individuals, four of whom serve on both boards. 72.7% are above the age of 50, and the remaining 27.3% are between the ages of 30-50. 9% are female, and 9% are ethnically diverse.</p> <p>Employees: Clearway's overall employee population is 21.8% female and 26.1% people of color. Office-based employees are 39% female and 28% people of color. Site employees are 7% female and 25% people of color. Managers are 21.6% female and 22.2% people of color. Director-level employees at Clearway are 25% female, and 20.5% people of color. Executives at Clearway are 32% female, and 16% people of color.</p>
406-1	Incidents of discrimination and corrective actions taken	<p>Teamwork and respect help ensure a safe, positive, professional work environment. At Clearway we do not tolerate or engage in discrimination, harassment or bullying, including physical or verbal abuse, intimidation or threats, aggressive behavior, teasing or practical jokes. Employees are encouraged to contact the Human Resources department, call the Clearway Ethics Helpline, or file a report online via the Clearway Ethics Alertline website if any harassment, bullying, or discrimination in hiring, promotion, transfer, training, layoff, termination or compensation and benefits is experienced or witnessed. Speaking out about unkind, unfair or discriminatory treatment is a matter of living Clearway's core values of respect and exemplary leadership. In 2020 we had no EEOC charges. Any complaints of discriminatory behavior were investigated but none were substantiated.</p>
EU15	Percentage of employees eligible to retire in the next 5 and 10 years broken down by job category and by region	<p>For purposes of this report, Clearway defines retirement eligibility as age 65 and older. All data is based on active employees' ages as of December 31, 2020.</p> <p>In 5 years (at the end of 2025), 78 Clearway employees will be eligible for retirement: 17 Clearway Energy Group LLC employees, 2 Clearway Energy, Inc. employees, and 59 Clearway Community Energy (also referred to as thermal) employees.</p> <p>In 10 years (at the end of 2030), 165 Clearway employees will be eligible for retirement: 50 Clearway Energy Group LLC employees, 6 Clearway Energy, Inc. employees, and 109 Clearway Community Energy (also referred to as thermal) employees.</p>
CHILD LABOR		
408-1	Operations and suppliers at significant risk for incidents of child labor	<p>All of Clearway's operations are in the U.S. and comply with applicable state and federal laws that disallow child labor. All of our suppliers are required to comply with our Supplier Codes of Conduct, which expressly disallow child labor.</p>
FORCED OR COMPULSORY LABOR		
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	<p>All of Clearway's operations are in the U.S. and comply with applicable state and federal laws that disallow forced or compulsory labor, and all of our suppliers are required to comply with our Supplier Codes of Conduct, which also expressly disallow forced or compulsory labor. In recognition of the significant concerns about human rights abuses and the use of forced labor in the Xinjiang region of China, which produces approximately 50% of the world's supply of solar-grade polysilicon, we have signed the Solar Energy Industry Association's Forced Labor Prevention Pledge. We source our solar panels from countries other than China, and require our suppliers to affirm that their supply chain practices conform with our requirements.</p>
RIGHTS OF INDIGENOUS PEOPLES		
411-1	Incidents of violations involving rights of indigenous peoples	<p>All of Clearway's operations are in the U.S. and none have ever resulted in incidents of violations of the rights of indigenous peoples. All of our international suppliers are large, publicly traded multinational corporations with strong sustainability practices, and we rely on the knowledge that if a violation of this type occurred, their internal controls would not allow it to go unaddressed.</p>
HUMAN RIGHTS ASSESSMENT		
412-1	Operations that have been subject to human rights reviews or impact assessments	<p>All of Clearway's operations are in the U.S. and none have ever been subject to human rights reviews or impact assessments.</p>
412-2	Employee training on human rights policies or procedures	<p>Our company Codes of Conduct and employee handbooks provide Clearway's expectations regarding fair employment practices, which includes respecting human rights. Our employees are required to agree to abide by these Codes.</p>

STANDARD NUMBER	DESCRIPTION	RESPONSE
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	Clearway's suppliers are required to comply with our Supplier Codes of Conduct, which expressly require that they respect the basic human rights of employees, and do not force employees to work against their will. All work performed for suppliers must be voluntary, and workers shall be free to leave work at any time or terminate their employment. Forced, involuntary prison labor, slavery or trafficking of persons is prohibited.
LOCAL COMMUNITIES		
413-1	Operations with local community engagement, impact assessments, and development programs	Corporate Citizenship (p. 11)
413-2	Operations with significant actual and potential negative impacts on local communities	In 2020, Clearway had no incidents that resulted in significant negative impacts to local communities.
SUPPLIER SOCIAL ASSESSMENT		
414-1	New suppliers that were screened using social criteria	100% of Clearway's new suppliers are screened through either our Technology Business Council process or the vendor qualification program, depending on the type of goods or services they provide. Both of these screening processes examine social impacts.
414-2	Negative social impacts in the supply chain and actions taken	In 2020 none of Clearway's suppliers triggered any red flags for negative environmental impacts during the supplier screening process.
PUBLIC POLICY		
415-1	Political contributions	<p><u>Industry Leadership</u> Industry Leadership (p. 42)</p> <p>In keeping with our commitment to expand the production and use of renewable energy, Clearway maintains active memberships in several industry trade associations. Where appropriate, we seek to play a leadership role and to leverage these associations' resources to advance initiatives that will make our industry more sustainable.</p> <p>We also recognize the importance of good public policy to our industry, and we engage in advocacy on issues that are important to us, such as renewable energy and climate change. This includes supporting political candidates at the state and federal level who are working to advance legislation on these issues.</p> <p>Clearway Energy Group LLC sponsors a non-connected political action committee (PAC) that makes financial contributions to selected candidates, party committees or other PACs that support issues that directly impact our industry and our company. The PAC is governed by a board comprised of employees from several departments across the Clearway enterprise, and the board votes on proposed contributions. The PAC operates according to all applicable federal and state laws and is funded entirely by voluntary contributions.</p> <p>In 2020, Clearway's Political Action Committee and Clearway Energy Group made approximately \$150,000 in political contributions to more than 100 candidates who stood for action on climate. This support helped drive policy outcomes that were critically important to our industry's success, whether at the federal level where we successfully advocated for an extended construction window for wind projects amidst the COVID-19 pandemic, or at the state level where we advocated for a range of laws and regulations that support renewable energy.</p>
CUSTOMER PRIVACY		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of data	In the course of work, our employees and suppliers may have access to non-public, confidential information regarding Clearway, its employees, customers and other third parties. Clearway protects this data in accordance with applicable laws, statutes, and regulations. Our company Codes of Conduct and Supplier Codes of Conduct establish the framework for our commitment to data privacy, and our IT policy establishes the technology infrastructure to protect data. Clearway actively takes measures to detect, prevent, and mitigate identity theft as required by federal law. In 2020, we had no breaches of customer privacy or losses of customer data. Clearway Energy Group's privacy policy is published at https://www.clearwayenergygroup.com/privacypolicy/ .
SOCIOECONOMIC COMPLIANCE		
419-1	Non-compliance with laws and regulations in the social and economic area	Clearway is not aware of any material instances of non-compliance with laws or regulations occurring in 2020, and no significant fines or non-monetary penalties for non-compliance were assessed against us.