

# Clearway 2021 ESG Report

## Global Reporting Initiative (GRI) Index

These disclosures pertain to Clearway's 2021 ESG report, which is available at [www.clearwayenergygroup.com/sustainability/](http://www.clearwayenergygroup.com/sustainability/).

### General Disclosures

STANDARD NUMBER	DESCRIPTION	RESPONSE
<b>ORGANIZATIONAL PROFILE</b>		
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	<a href="#">About Clearway</a>
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	<a href="#">About Clearway</a>
102-6	Markets served	<a href="#">Our Projects</a> <a href="#">Clearway Community Solar</a> Building A Net-Zero Energy Sector (p. 7)
102-7	Scale of the organization	<a href="#">About Clearway</a> <a href="#">Our Projects</a> Building A Net-Zero Energy Sector (p. 7)
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 700 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, energy storage, 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	Supplier Diversity (p. 15)
102-10	Significant changes to the organization and its supply chain	In 2021, Clearway Energy, Inc. entered into an agreement to sell its thermal business (Clearway Community Energy). Approximately 250 employees will leave Clearway as part of this sale. Aside from this transaction, Clearway continued to experience growth in 2021, increasing from 676 to 714 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	<a href="#">Industry Leadership</a> Environmental Stewardship (p. 36)
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
<b>STRATEGY</b>		
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 5.6 GW of wind, solar, and energy storage facilities in operation in 26 states and Puerto Rico. As such, our customers' biggest impact is the displacement of fossil-fuel fire 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>
<b>ETHICS &amp; INTEGRITY</b>		
102-16	Values, principles, standards, and norms of behavior	<p><a href="#">Our Vision &amp; Values</a> <a href="#">About Clearway</a></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><a href="#">Governance</a> Governance (p. 40)</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>
<b>GOVERNANCE</b>		
102-18	Governance structure	<p><a href="#">Governance</a></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 its <a href="#">website</a>.</p>
102-20	Executive-level responsibility for economic, environmental, and social topics	<p><a href="#">Governance</a></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 LLC 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, artifacts, and habitat, and implement means to minimize or avoid impacts.</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	<a href="#">Governance</a>
102-23	Chair of the highest governance body	<b>Jonathan Bram</b> <a href="#">Governance</a>
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	<a href="#">Governance</a>
102-27	Collective knowledge of highest governance body	<a href="#">Our Leadership</a>
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	<b>Board of Directors</b> The decision to report on our ESG performance was initiated by our CEOs in coordination with our Boards of Directors. They invited our leadership team to undertake the task of delivering this report, and Clearway's executive teams have reviewed and approved it prior to its release.
102-33	Communicating critical concerns	<a href="#">Governance</a>
102-34	Nature and total number of critical concerns	<a href="#">Climate Change Analysis</a> Governance (p. 40) 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	<p><b>Internal</b></p> <ul style="list-style-type: none"> <li>• Employees</li> </ul> <p><b>External</b></p> <ul style="list-style-type: none"> <li>• Project lenders and equity investors</li> <li>• Customers and off-takers</li> <li>• Vendors and suppliers</li> <li>• Insurers and guarantors</li> <li>• Participating landowners</li> <li>• Non-participating landowners</li> <li>• Project area communities</li> <li>• Federal, regional, and local governments</li> <li>• Permitting authorities</li> <li>• Regulators and government agencies</li> <li>• Industry associations</li> <li>• Non-governmental organizations</li> <li>• Industry subject matter experts and academics</li> </ul>
102-43	Approach to stakeholder engagement	<p><a href="#">Our Partners</a></p> <p>Clearway Energy Group LLC'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.</p>

STANDARD NUMBER	DESCRIPTION	RESPONSE
<b>REPORTING PRACTICE</b>		
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 2021 (January 1 – December 31, 2021). Topics related to Clearway's portfolio are primarily focused on the renewable energy assets we own and operate. This report differs from Clearway's 2020 ESG report in that it does not include information that pertains to Clearway Energy, Inc.'s thermal assets or employees, also known as Clearway Community Energy; where specified, selected information pertains solely to either Clearway Energy Group LLC or to Clearway Energy, Inc.</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's 2020 ESG report in that it does not include information that pertains to Clearway Energy, Inc.'s thermal assets or employees, also known as Clearway Community Energy; where specified, selected information pertains solely to either Clearway Energy Group LLC or to Clearway Energy, Inc.</p>
102-50	Reporting period	Calendar year 2021
102-51	Date of most recent report	Clearway's 2020 sustainability report was released in March 2021.
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>Building A Net-Zero Energy Sector (p. 7)</p> <p>As of December 31, 2021, Clearway Energy Group LLC and Clearway Energy, Inc. own and operate nearly 8 GW of renewable and conventional energy assets. Approximately 5.6 GW of this capacity is comprised of wind, solar, and energy storage assets.</p>

## Specific Standard Disclosures

STANDARD NUMBER	DESCRIPTION	RESPONSE
<b>EU SECTOR TOPIC: AVAILABILITY AND RELIABILITY</b>		
EU10	Planned capacity against projected electricity demand over the long term, broken down by energy source and regulatory regime	<p>Building A Net-Zero Energy Sector (p. 7)</p> <p>Clearway Energy Group LLC has a 19 GW development pipeline of wind, solar, and energy storage projects. In 2021, we signed 1.1 GW of new renewable power purchase agreements related to projects in the development pipeline as well as 2 GW of new contracts supporting existing projects within Clearway's operating portfolio.</p>
<b>INDIRECT ECONOMIC IMPACTS</b>		
203-2	Significant indirect economic impacts	<p>In 2021, the sites owned and operated by Clearway contributed \$45.2 million in property taxes and \$13 million in landowner payments to their host communities. In addition, Clearway and its employees contributed approximately \$643,000 in donations, sponsorships, and support to nonprofit organizations in the communities where we live and operate.</p>
<b>ANTI-CORRUPTION</b>		
205-1	Operations assessed for risks related to corruption	<p><a href="#">Governance</a> Governance (p. 40)</p> <p>In 2020, Clearway Energy Group LLC 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.</p>
205-2	Communication and training about anti-corruption policies and procedures	<p><a href="#">Governance</a> Governance (p. 40)</p> <p>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.</p>
205-3	Confirmed incidents of corruption and actions taken	<p>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 2021, there were no incidents of corruption identified within our organization.</p>
<b>ANTI-COMPETITIVE BEHAVIOR</b>		
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	<p>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 2021, there were no incidents of, or legal actions taken against us, for anti-competitive behavior, anti-trust, or monopoly practices.</p>
<b>WATER &amp; EFFLUENTS</b>		
303-1	Interactions with water as a shared resource	<p>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.</p> <p>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.</p>

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 LLC 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 sites discharge water to bodies of freshwater, seawater or surface water. In 2021, we tracked water discharge at 73% of these sites, and it totaled 272,939 gallons.
303-5	Water consumption	Environmental Stewardship (p. 36) 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 2021, we tracked water usage at 74% of these sites, which totaled 734,190 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 2021 Clearway Energy Group LLC expanded its capability to track waste generation at the site level, and we are now able to report on 74% of our sites. These sites generated a total of 596,200 pounds of non-hazardous waste in 2021. 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 292,600 pounds, while the remaining 303,600 pounds were disposed of in a permitted landfill. Waste disposal was directed by the organization and cooperation with the waste disposal contractor. 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 5 GW of solar, wind, and energy storage under ownership operating in 26 states.
306-3	Significant spills	In 2021, our Rattlesnake Flats wind site had a small hydraulic line leak that resulted in a reportable quantity of hydraulic fluid being released into the environment. The spill was cleaned up in accordance with local, state and federal regulations.
306-4	Transport of hazardous waste	Clearway Energy Group LLC did not dispose of any federally designated hazardous waste in 2021.

STANDARD NUMBER	DESCRIPTION	RESPONSE
<b>ENVIRONMENTAL COMPLIANCE</b>		
307-1	Non-compliance with environmental laws and regulations	In 2021, 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
<b>SUPPLIER ENVIRONMENTAL ASSESSMENT</b>		
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 screening processes examine environmental impacts.
<b>EMPLOYMENT</b>		
401-1	New employee hires and employee turnover	In 2021, Clearway welcomed 203 new team members to the organization across a variety of locations, roles, levels, and functions. Across the Clearway enterprise, voluntary turnover was 16.9% during 2021.
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	<p>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&amp;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.</p> <p>In 2021, Clearway expanded the Employee Assistance Program to include more covered counseling sessions at no cost to the employee. Further, the company now waives benefit premiums for employees who are on long-term disability.</p>
401-3	Parental leave	<p>Clearway offers parental leave to full-time employees so that they can bond with a new child. In 2021, 521 male employees and 181 female employees were entitled to parental leave; 32 male employees and 12 female employees used this benefit. Clearway's return-to-work and retention rate is 100%, as all employees who took parental leave in 2020 and returned to work were still employed 12 months after their return.</p> <p>In 2021, Clearway enhanced Parental Leave &amp; Adoption Assistance Benefits by increasing the number of weeks of leave for primary caregivers and allowing a phased return-to-work option, to better support our employees as they welcome new members to their family. Additionally, Adoption Assistance was doubled, and the requirement for neither parent to be biological was removed to better support same-sex couples and blended families.</p>
<b>OCCUPATIONAL HEALTH &amp; SAFETY</b>		
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 consists of elements that establish a set of mandatory minimum standards for the management of environmental health and safety (EHS) across Clearway. These elements establish the foundation for a set of policies, procedures and guidelines to deliver continuous improvement and control EHS risk. 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.

STANDARD NUMBER	DESCRIPTION	RESPONSE
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.
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 (the majority of this training has been conducted virtually since the onset of the COVID-19 pandemic). 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	<p>Our Safety Metrics (p. 18)</p> <p>Data is for Clearway Energy Group LLC (CEG) operations and maintenance employees and contractors under day-to-day direction from CEG:</p> <ul style="list-style-type: none"> <li>• Worker Hours: 1,330,512</li> <li>• OSHA Recordable Injuries: 3</li> <li>• OSHA Total Recordable Incident Rate (TRIR): 0.45</li> <li>• Fatalities: 0</li> <li>• Lost Time Injuries: 1</li> <li>• Lost Time Injury Rate: 0.15</li> <li>• Days Away/Restricted Duty or Transfer Injuries: 2</li> <li>• DART Rate: 0.30</li> <li>• First Aid Injuries: 17</li> </ul>
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 LLC'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.
<b>TRAINING &amp; EDUCATION</b>		
404-1	Average hours of training per year per employee	In 2021, the Human Resources & Training Departments issued more than 27,772 learning assignments to more than 1,409 Clearway employees and contractors with an 82.76 % completion rate. Approximately 12,275 of these assignments were compliance-related training for site personnel, and these were completed at a rate of 90.41 %, with 9 of our sites achieving 100% completion (for compliance training). Across the Clearway enterprise, employees received an average of 19 learning assignments in 2021.
404-2	Programs for upgrading employee skills and transition assistance programs	<p>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.</p> <p>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.</p>
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
<b>DIVERSITY</b>		
405-1	Diversity of governance bodies and employees	<p>Our Diversity Metrics (p. 17)</p> <p>Diversity data for Clearway as of December 31, 2021, is as follows:</p> <p>Governance Bodies: Clearway's two governing bodies are made up of 12 individuals, three of whom serve on both boards. 75% are above the age of 50, and the remaining 25% are between the ages of 30-50. 8% are female, and 8% are ethnically diverse.</p> <p>Employees: Clearway's overall employee population is 25.8% female and 31.9% people of color. Office-based employees are 39.8% female and 30.4% people of color. Site employees are 7.9% female and 33.9% people of color. Managers are 27.9% female and 26.6% people of color. Director-level employees at Clearway are 28% female, and 23.5% people of color. Executives at Clearway are 34.8% female, and 26.1% people of color.</p>
405-2	Ratio of basic salary and remuneration of women to men	Clearway conducts annual reviews of pay equity by gender and ethnicity/race. We are committed to fairness in compensation, and if wage disparities are identified, they are addressed.
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 2021 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, 2021.</p> <p>In 5 years (at the end of 2026), 16 Clearway employees will be eligible for retirement: 15 Clearway Energy Group LLC employees and 1 Clearway Energy, Inc. employee.</p> <p>In 10 years (at the end of 2031), 56 Clearway employees will be eligible for retirement: 51 Clearway Energy Group LLC employees and 5 Clearway Energy, Inc. employees.</p>
<b>CHILD LABOR</b>		
408-1	Operations and suppliers at significant risk for incidents of child labor	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.
<b>FORCED OR COMPULSORY LABOR</b>		
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. We're also working toward diversifying our module supply away from Southeast Asia and including domestically produced solar panels.</p>
<b>RIGHTS OF INDIGENOUS PEOPLES</b>		
411-1	Incidents of violations involving rights of indigenous peoples	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.
<b>HUMAN RIGHTS ASSESSMENT</b>		
412-1	Operations that have been subject to human rights reviews or impact assessments	All of Clearway's operations are in the U.S. and none have ever been subject to human rights reviews or impact assessments.
412-2	Employee training on human rights policies or procedures	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.

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.
<b>LOCAL COMMUNITIES</b>		
413-1	Operations with local community engagement, impact assessments, and development programs	Community Engagement (p. 20)
413-2	Operations with significant actual and potential negative impacts on local communities	In 2021, Clearway had no incidents that resulted in significant negative impacts to local communities.
<b>SUPPLIER SOCIAL ASSESSMENT</b>		
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 screening processes examine social impacts.  In 2021, we created the <a href="#">Clearway LEADS</a> policy, which promotes purchasing from local, environmentally aware, diverse, and small businesses, and will be applicable to all our major equipment and service providers beginning in 2022.
414-2	Negative social impacts in the supply chain and actions taken	In 2021, none of Clearway's suppliers triggered any red flags for negative environmental impacts during the supplier screening process.
<b>PUBLIC POLICY</b>		
415-1	Political contributions	<u>Industry Leadership</u>  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.  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.  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.  In 2021, Clearway's PAC and Clearway Energy Group LLC made approximately \$40,000 in political contributions to candidate campaigns and PACs that prioritize clean and renewable energy policies. This support helped drive policy outcomes that were critically important to our industry's success at both the federal and state level.
<b>CUSTOMER PRIVACY</b>		
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 2021, we had no breaches of customer privacy or losses of customer data. Clearway Energy Group LLC's privacy policy is published at <a href="https://www.clearwayenergygroup.com/privacypolicy/">https://www.clearwayenergygroup.com/privacypolicy/</a> .
<b>SOCIOECONOMIC COMPLIANCE</b>		
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 2021, and no significant fines or non-monetary penalties for non-compliance were assessed against us.