

# Clearway 2022 ESG Report

## Global Reporting Initiative (GRI) Index

These disclosures pertain to Clearway's 2022 ESG report, which is available at [www.clearwayenergygroup.com/sustainability/](http://www.clearwayenergygroup.com/sustainability/).

### General Disclosures

STANDARD NUMBER	DESCRIPTION	RESPONSE																					
<b>THE ORGANIZATION AND ITS REPORTING PRACTICES</b>																							
2-1	Organizational details	Scaling Our Impact (p. 7) Clearway operates in the United States. Clearway Energy Group 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.																					
2-2	Entities included in the organization's sustainability reporting	This report pertains to Clearway Energy Group, and our public affiliate Clearway Energy, Inc., collectively "Clearway." Where specified, selected information pertains solely to either Clearway Energy Group or Clearway Energy, Inc.																					
2-3	Reporting period, frequency and contact point	About This Report (p. 3) Calendar year 2022 Annual Zadie Oleksiw, Director, Communications <a href="mailto:zadie.oleksiw@clearwayenergy.com">zadie.oleksiw@clearwayenergy.com</a>																					
2-4	Restatements of information	About This Report (p. 3) None																					
2-5	External assurance	About This Report (p. 3)																					
<b>ACTIVITIES AND WORKERS</b>																							
2-6	Activities, value chain and other business relationships	<b>About Clearway</b> <b>Our Projects</b> <b>Our Customers</b> <b>Clearway Community Solar</b> Creating a Sustainable Supply Chain (p. 33) Clearway is a leading owner and operator of clean energy projects in the US, including:  ~7 GW gross operating portfolio 5.6 GW net owned capacity ~28 GW under development >350 clean energy assets in operation across 26 states																					
2-7	Employees	Clearway Energy Group and Clearway Energy, Inc. share multiple departments. Together, the two companies have nearly 800 employees spread across five corporate offices as well as our site locations, all of which are in the US. Our team offers a diverse range of experience, including leaders in the solar, wind, energy storage, and natural gas industries, engineers, project developers and investment specialists, as well as experts in environmental issues, permitting, interconnection, transmission and power plant operations.  <b>Clearway's Full-Time Employees, by Gender and Region, as of December 31, 2022</b> <table border="1"> <thead> <tr> <th>Region</th> <th>Female</th> <th>Male</th> </tr> </thead> <tbody> <tr> <td>East</td> <td>49</td> <td>89</td> </tr> <tr> <td>Gulf Coast</td> <td>40</td> <td>111</td> </tr> <tr> <td>Midwest</td> <td>16</td> <td>60</td> </tr> <tr> <td>Rocky Mountain</td> <td>17</td> <td>37</td> </tr> <tr> <td>West</td> <td>108</td> <td>251</td> </tr> <tr> <td><b>Total</b></td> <td><b>230</b></td> <td><b>548</b></td> </tr> </tbody> </table>	Region	Female	Male	East	49	89	Gulf Coast	40	111	Midwest	16	60	Rocky Mountain	17	37	West	108	251	<b>Total</b>	<b>230</b>	<b>548</b>
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GOVERNANCE		
2-9	Governance structure and composition	<p><b>Governance</b> – Clearway Energy Group</p> <p><b>Governance</b> – Clearway Energy, Inc.</p> <p>Scaling Our Impact (p. 7)</p> <p>Changes to Our Governance Structure (p. 36)</p> <p>2022 brought a significant change to our ownership structure when TotalEnergies joined Global Infrastructure Partners as 50:50 co-owner of Clearway Energy Group, and by extension, Clearway Energy, Inc.</p>
2-11	Chair of the highest governance body	<p><b>Governance</b> – Clearway Energy Group</p> <p><b>Governance</b> – Clearway Energy, Inc.</p> <p>Johnathan Bram is chair of the board that oversees Clearway Energy Group as well as Clearway Energy, Inc.'s board of directors.</p>
2-12	Role of the highest governance body in overseeing the management of impacts	<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.</p> <p>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> <p>In the event potential impacts are identified, they are brought before members of Clearway Energy Group's Development Committee and Capital Committee, and if appropriate to the board that oversees Clearway Energy Group.</p>
2-13	Delegation of responsibility for managing impacts	<p><b>Governance</b> – Clearway Energy Group</p> <p><b>Governance</b> – Clearway Energy, Inc.</p> <p>Governance at Clearway (p. 36)</p> <p>Sustainability at Clearway (p. 37)</p> <p>The board that oversees Clearway Energy Group has oversight of our Sustainability-ESG Committee, as well as our ESG working groups. This structure provides a mechanism for the formal communication of ESG goals, and feedback regarding the impacts of the company's activities.</p> <p>Further, Clearway Energy Group's leadership team meets regularly to discuss business activities, including ongoing efforts to advance initiatives that pertain to environmental, social, and governance issues.</p>
2-14	Highest governance body's role in sustainability reporting	<p>Board of Directors</p> <p>The decision to report on our ESG performance was initiated by our CEOs in coordination with our Boards of Directors. They invited our leadership teams to undertake the task of delivering this report and reviewed and approved it prior to its release, including the list of material topics.</p> <p>The topics identified in our 2022 stakeholder materiality assessment were sent to the board that oversees Clearway Energy Group for review and approval, following a systematic internal review process that involved each layer of the organization.</p>
2-15	Conflicts of interest	<p>The Charter of the Corporate Governance, Conflicts and Nominating Committee of the Board of Directors of Clearway Energy, Inc., which can be found on Clearway Energy, Inc.'s <a href="#">governance page</a>, specifically addresses potential conflicts of interest.</p> <p>Further, 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.</p>

2-16	Communicating critical concerns	<p><b>Governance</b> – Clearway Energy Group</p> <p><b>Governance</b> – Clearway Energy, Inc.</p> <p>Governance at Clearway (p. 36)</p> <p>Sustainability at Clearway (p. 37)</p> <p>The board that oversees Clearway Energy Group has oversight of our Sustainability-ESG Committee, as well as our ESG working groups. This structure provides a mechanism for the formal communication of ESG goals, and feedback regarding the impacts of the company's activities.</p> <p>Further, Clearway Energy Group's leadership team meets regularly to discuss business activities, including ongoing efforts to advance initiatives that pertain to environmental, social, and governance issues.</p> <p>In 2022, no critical concerns were raised by stakeholders, and therefore none were communicated to the board that oversees Clearway Energy Group.</p>
2-17	Collective knowledge of highest governance body	<p><b>Our Leadership</b> – Clearway Energy Group</p> <p><b>Governance</b> – Clearway Energy, Inc.</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. Each company's leadership team meets regularly to discuss business activities, including ongoing efforts to advance initiatives that pertain to environmental, social, and governance issues.</p>
<b>STRATEGY, POLICIES AND PRACTICES</b>		
2-22	Statement on sustainable development strategy	<p>Message From Our CEOs (p. 1)</p> <p>Regenerative Development (p. 27)</p>
2-23	Policy commitments	<p><b><u>Our Vision &amp; Values</u></b></p> <p><b><u>About Clearway</u></b></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> <p>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.</p> <p>Our employees sign our Codes of Conduct, which serves as a guide and translates our values and operating principles into the standards of behavior we expect from one another. These values and our operating principles underlie our ethical decision-making and are the foundation of our culture.</p> <p>Our suppliers are required to follow our <b>Supplier Code of Conduct</b>, which sets forth our expectations regarding responsible business practices, including respect for human rights.</p>
2-26	Mechanisms for seeking advice and raising concerns	<p><b>Governance</b> – Clearway Energy Group</p> <p><b>Governance</b> – Clearway Energy, Inc.</p> <p>Governance at Clearway (p. 36)</p> <p>Clearway considers ethics and accountability to be of the utmost importance. Our Codes of Conduct and <b>Supplier Code of Conduct</b> address ethics matters and expectations.</p> <p>New employees and subcontractors receive training on these Codes, and we require that all employees acknowledge the company Code 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>

2-27	Compliance with laws and regulations	<p>In 2022, Clearway Energy Group had two instances of non-compliance with laws or regulations:</p> <ol style="list-style-type: none"> <li>1. During construction of the Waiawa Solar project in Hawaii, Clearway Energy Group received a Notice of Violation from the City and County of Honolulu's Department of Facility Maintenance. The incident related to significant rainfall and resulted in mud from the construction site being carried off site through an adjacent property and onto a public street. The affected property owners were promptly contacted, and the mud was removed the following day. County agents inspected the scene and reports were filed to those agencies as required. Best management practices for sediment control have been re-evaluated with substantial modifications made, and the \$500 fine was paid.</li> <li>2. During construction of the Black Rock wind project in West Virginia, Clearway Energy Group received a Notice of Violation from the West Virginia Department of Environmental Protection. The notice was issued for various deficiencies relating to stormwater control, sedimentation buildup, reseed areas, and erosion. Improvements to address the deficiencies were implemented and no fines were assessed.</li> </ol>
2-28	Membership associations	<p><b><u>Industry Leadership</u></b></p> <p>Environmental Stewardship (p. 26)</p> <p>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.</p>

**STAKEHOLDER ENGAGEMENT**

2-29	Approach to stakeholder engagement	<p><b><u>Our Partners</u></b></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.</p> <p>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> <p>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.</p> <p>Our stakeholders include:</p> <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> <li>• Schools and community colleges</li> </ul>
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REPORTING PRACTICE		
3-1	Process to determine material topics	Prioritizing Our Material Topics (p. 38)
3-2	List of material topics	<p>Prioritizing Our Material Topics (p. 38)</p> <ul style="list-style-type: none"> <li>• Climate strategy &amp; GHG emissions</li> <li>• Diversity, equity and inclusion (DEI)</li> <li>• Waste &amp; end of life management</li> <li>• Business integrity</li> <li>• Human rights &amp; labor practices</li> <li>• Supplier sustainability</li> <li>• Wildlife &amp; biodiversity</li> <li>• Occupational health &amp; safety</li> <li>• Corporate citizenship</li> </ul>
INDIRECT ECONOMIC IMPACTS		
203-2	Significant indirect economic impacts	In 2022, the sites owned and operated by Clearway contributed \$59 million in property taxes and \$16 million in landowner payments to their host communities. In addition, Clearway and its employees contributed approximately \$760,000 in donations, sponsorships, and support to nonprofit organizations in the communities where we live and operate.
PROCUREMENT PRACTICES		
204-1	Proportion of spending on local suppliers	In 2022, 14.8% of our operational expenditures, and 5.8% of our corporate expenditures – an average of 5.9% overall – went to local, environmentally aware, diverse, and small businesses, as defined by our Clearway LEADS policy.
ANTI-CORRUPTION		
205-1	Operations assessed for risks related to corruption	<p><b>Governance</b> – Clearway Energy Group</p> <p><b>Governance</b> – Clearway Energy, Inc.</p> <p>Governance at Clearway (p. 36)</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><b>Governance</b> – Clearway Energy Group</p> <p><b>Governance</b> – Clearway Energy, Inc.</p> <p>Governance at Clearway (p. 36)</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	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 US Foreign Corrupt Practices Act (FCPA). In 2022, 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 2022, there were no incidents of, or legal actions taken against us, for anti-competitive behavior, anti-trust, or monopoly practices.
ENERGY		
302-1	Energy consumption within the organization	In 2022, electricity use in our offices and buildings totaled 19,906 MWh.

WATER & EFFLUENTS		
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>
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 sites discharge water to bodies of freshwater, seawater or surface water. In 2022, we tracked water discharge at 84% of these sites, and it totaled 622,288 gallons.
303-5	Water consumption	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 2022, we tracked water usage at 84% of these sites, which totaled 720,857 gallons.
BIODIVERSITY		
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	<p><b>Environmental Stewardship</b></p> <p>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.</p>
304-2	Significant impacts of activities, products, and services on biodiversity	<b>Environmental Stewardship</b>
304-3	Habitats protected or restored	<b>Environmental Stewardship</b>
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk	<p>California condor (Endangered, USFWS)                      Giant kangaroo rat (Endangered, USFWS)                      Whooping crane (Endangered, USFWS)                      San Joaquin kit fox (Endangered, USFWS)                      Indiana bat (Endangered, USFWS)                      Northern long-eared bat (Endangered, USFWS)                      Bakersfield cactus (Endangered, USFWS)                      Mohave desert tortoise (Threatened, USFWS)                      Utah prairie dog (Threatened, USFWS)                      Hawaiian short eared owl (Endangered, Hawaii)                      Western burrowing owl (Species of Concern, California)                      Swainson's hawk (Threatened, California)                      Bald eagle (Bald and Golden Eagle Protection Act)                      Golden eagle (Bald and Golden Eagle Protection Act)</p>

EMISSIONS		
305-2	Energy indirect (Scope 2) GHG emissions	8,611 metric tons.
WASTE		
306-1	Waste generation and significant waste-related impacts	<p>Managing Waste, Cradle-to-Cradle (p. 31)</p> <p>The vast majority of the waste Clearway generates occurs during construction (upstream) or end-of-life (downstream) during decommissioning of our sites. No significant waste is generated during operations.</p> <p>Creating sustainable, cradle-to-cradle supply chains that prioritize resource recovery and waste minimization is a priority for the clean energy industry, and Clearway is actively pursuing avenues to increase the amount of project-related waste we recycle. We look forward to reporting on our progress in this area in our 2023 ESG report.</p>
306-2	Management of significant waste-related impacts	<p>Managing Waste, Cradle-to-Cradle (p. 31)</p> <p>Waste minimization is an over-arching policy at Clearway, an approach that is consistent with our commitment to reduce our environmental impacts.</p>
306-3	Waste generated	In 2022 Clearway Energy Group expanded its capability to track waste generation at the site level, and we are now able to report on 84% of our sites. These sites generated a total of 336,422 pounds of non-hazardous waste in 2022. 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 312,400 pounds, while the remaining 253,000 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 federally designated hazardous waste.
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 Quality Review process or the vendor qualification program, depending on the type of goods or services they provide. Both screening processes examine environmental impacts.
EMPLOYMENT		
401-1	New employee hires and employee turnover	In 2022, Clearway welcomed 221 new team members to the organization across a variety of locations, roles, levels, and functions. Across the Clearway enterprise, voluntary turnover was 16% during 2022.
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.</p> <p>Clearway also provides a variety of work/life benefits including: voluntary accident, critical illness and cancer, and hospital insurance; pet insurance; employee assistance and commuter expense programs; dependent care assistance; fertility programs; adoption assistance; tuition reimbursement; and benefits for employees in same-sex marriages, civil unions and domestic partnerships. For those welcoming new additions to their family, Clearway offers full-time employees a generous parental leave program and adoption assistance benefits.</p> <p>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. Clearway also waives benefit premiums for employees who are on long-term disability.</p> <p>In 2022, we introduced new benefits such as Summer Fridays for the month of August which allow employees to leave early to enjoy summer with their families, and a new wellness spending account that supports mental, physical, and financial wellness programs such as meditation, acupuncture, wellness retreats, counseling and therapy not covered by insurance, smoking cessation, fertility and surrogacy services, gym memberships, fitness classes, and credit and financial counseling.</p>
401-3	Parental leave	Clearway offers parental leave to full-time employees so that they can bond with a new child. In 2022, 780 male employees and 238 female employees were entitled to parental leave; 31 male employees and 6 female employees used this benefit. Clearway's return-to-work and retention rate is 85%, as all employees who took parental leave in 2021 and returned to work were still employed 12 months after their return.

## OCCUPATIONAL HEALTH & SAFETY

The construction of Clearway's renewable energy facilities is performed by third-party contractors. Clearway monitors contractor safety performance on sites and works with those contractors to ensure contractual and regulatory requirements are adhered to. We maintain an industry-leading level of quality assurance in our construction management processes, and we partner with the most capable construction firms in the industry. All of our contractors must demonstrate excellent safety performance, and all contractors working under the direction of Clearway undergo training to carry out the responsibilities associated with their positions. Third-party contractors are required to have their own training programs that assure the safety of their personnel and compliance with all legal requirements, and they are required to comply with all applicable federal, state and local legal requirements at all times.

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.
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. 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. 16)</p> <p>Data is for Clearway Energy Group operations and maintenance employees and contractors under day-to-day direction from our staff:</p> <ul style="list-style-type: none"> <li>• Worker Hours: 1,446,576</li> <li>• OSHA Recordable Injuries: 11</li> <li>• OSHA Total Recordable Incident Rate (TRIR): 1.52</li> <li>• Fatalities: 0</li> <li>• Lost Time Injuries: 3</li> <li>• Lost Time Injury Rate: 0.41</li> <li>• Days Away/Restricted Duty or Transfer (DART) Injuries: 4</li> <li>• DART Rate: 0.55</li> <li>• First Aid Incidents: 22</li> </ul>

## TRAINING & EDUCATION

404-1	Average hours of training per year per employee	In 2022, the Human Resources & Training Departments issued more than 3,500 learning assignments to more than 800 Clearway employees and contractors with an 94% completion rate.
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.



DIVERSITY		
405-1	Diversity of governance bodies and employees	<p>Our Diversity Metrics (p. 21)</p> <p>Diversity data for Clearway Energy Group and Clearway Energy, Inc., as of December 31, 2022, is as follows:</p> <p>Governance Bodies: Clearway Energy Inc's governing body is made up of 11 individuals, five of whom serve on the board that governs Clearway Energy Group. 64% are above the age of 50, and the remaining 36% are between the ages of 30-50. 9% are female, and 9% are ethnically diverse.</p> <p>Employees: Clearway's overall employee population is 30% female and 33% people of color. Office-based employees are 41% female and 31% people of color. Site employees are 10% female and 38% people of color. Executives at Clearway are 30% female, and 23% 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	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 2022 we had no EEOC charges. Any complaints of discriminatory behavior were investigated but none were substantiated.
CHILD LABOR		
408-1	Operations and suppliers at significant risk for incidents of child labor	<p>Creating a Sustainable Supply Chain (p. 33)</p> <p>All of Clearway's operations are in the US and comply with applicable state and federal laws that disallow child labor. All 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>Creating a Sustainable Supply Chain (p. 33)</p> <p>All of Clearway's operations are in the US and comply with applicable state and federal laws that disallow forced or compulsory labor, and all 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 <b>Forced Labor Prevention Pledge</b>. 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 US and none have ever resulted in incidents of violations of the rights of indigenous peoples. All 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> <p>Clearway completes a cultural resource inventory review for all development projects to ensure they are designed in compliance with federal and state regulations pertaining to the protection of cultural and tribal resources. Additionally, and where necessary, Clearway will conduct its own voluntary additional outreach with tribes to solicit feedback on our projects and to build relationships; this is in addition to the consultation that agencies may complete with tribal groups prior to approving a project's permit.</p>
HUMAN RIGHTS ASSESSMENT		
412-1	Operations that have been subject to human rights reviews or impact assessments	All of Clearway's operations are in the US 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.

412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	<p>Creating a Sustainable Supply Chain (p. 33)</p> <p>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.</p>
<b>LOCAL COMMUNITIES</b>		
413-1	Operations with local community engagement, impact assessments, and development programs	Engaging Communities Across the Country (p. 22)
413-2	Operations with significant actual and potential negative impacts on local communities	In 2022, 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	<p>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.</p> <p>In 2022, we implemented our <b>Clearway LEADS</b> supplier diversity policy, which is applicable to all our major equipment and service providers. Clearway LEADS promotes the inclusion of local, environmentally aware, diverse and small businesses in our purchasing process and seeks to reduce the environmental impact of our supply chain.</p>
414-2	Negative social impacts in the supply chain and actions taken	In 2022, none of Clearway's suppliers triggered any red flags for negative social impacts during the supplier screening process.
<b>PUBLIC POLICY</b>		
415-1	Political contributions	<p><b>Industry Leadership</b></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 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 2022, Clearway's PAC and Clearway Energy Group made approximately \$200,000 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.</p>
<b>CUSTOMER PRIVACY</b>		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of data	<p>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 2022, we had no breaches of customer privacy or losses of customer data. Clearway Energy Group's privacy policy is published at <a href="https://www.clearwayenergygroup.com/privacy-policy/">https://www.clearwayenergygroup.com/privacy-policy/</a>.</p>
<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 2022, and no significant fines or non-monetary penalties for non-compliance were assessed against us.