EDF Renewables

Response received by BHRRC from EDF Renewables regarding assessment of exposure to and steps taken in response to forced labour issues in XUAR as documented by Sheffield Hallam University, among others , 11 July 2023.

(1) Assessment of exposure

"At EDF Renewables we rejects all forms of forced labour, as defined in the ILO's Fundamental Conventions. EDF Renewables in particular ensures that intermediaries and employment agencies do not resort to practices that may entail forced labour.

We tolerate no violations of human rights or fundamental freedoms, in any of its activities, and strives to enforce this principle in all activities carried out by third parties when those activities are included in the scope of the company's business relationships.

We are committed to comply, and we expect our business relations to comply, as a minimum, with the international standards regarding protection and defense of human rights and fundamental freedoms, in particular including the United Nations International Bill of Human Rights and the International Labour Organization's eight Fundamental Conventions. If there are inconsistencies between the laws in a host country and these international standards, we strive to find an approach that conforms to the spirit of the international standards and concurrently complies with the country's laws.

To ensure respect for human rights and fundamental freedoms in its activities, the EDF Group has set up a vigilance mechanism to identify, assess and prevent any risk of violations of these rights and freedoms. This vigilance mechanism complies with the French law on the duty of care and is based on the recommendations in the UN Guiding Principles on Business and Human Rights.
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We apply a strict qualification process to our equipment suppliers, carried out in two stages.

First, a documentary audit during which we collect and analyze environmental and social information from suppliers – including information related to Human Rights such as code of business conduct, human rights policy, grievance mechanisms for workers, internal working conditions inspection, and responsible procurement process.

If the supplier passes this first qualification stage, all the facilities used to produce our cells and modules are then audited in order to check that their processes are up to EDF Renewables' standards, including on social aspects. Workers must have legal and decent working conditions, and any form of forced labor shall not be accepted.

Currently, to the best of our knowledge, none of our qualified factories are located in the Xinjiang region."

(2) Steps taken in response

"EDF Renewables is committed to paying special attention to the impacts of its activities on people considered vulnerable under international human rights law, and requires its business relations to do the same.

We are committed to investigate, transparently, impartially and in good faith, all claims of violations of human rights or fundamental freedoms relating to the activities carried out by the Group's entities, service providers and subcontractors.

We include our Environmental and Social clause in all equipment contracts with qualified suppliers. By signing the contract, which establishes a business relationship with EDF Renewables, suppliers commits to respect EDF Renewables' environmental and social requirements and to apply the same environmental and social standards to their own suppliers and subcontractors.

These requirements have been established according to the principles of the United Nations Universal Declaration of Human Rights, the Ten Principles of the United Nations Global Compact, and the Fundamental Conventions of the ILO. They are structured around the following themes : environmental and social compliance, environmental and social management, information, communication and audit, environmental requirements, social requirements (human rights, labor rights, rights of local communities).

Failure to comply with the requirements of the E&S clause may lead to termination of the contract."