



# Monitoring good practices



## Monitoring Good practices

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### Introduction:

- Secretariat conducted baseline assessment of signatory companies of the International RBC Agreement for the Renewable Energy Sector during April – July 2024 in accordance with the [Assessment Framework](#) of the Agreement. During the assessment process, Secretariat compiled a list of positive practices from the sector.
- The goal of this document to highlight these positive examples and provide inspiration for the wind and solar sector on responsible business conduct.
- This selection has been made by the Secretariat. Individual opinions of the parties of the Agreement may differ.
- Each good practice should be looked in the context of the due diligence maturity level of the given sector. Some of the featured good practices might not be the highest standard in other sectors and/or even within renewables sector itself. Some of the examples from solar sector might not be relevant or seen as good practice for wind sector and vice versa.
- This is a living document. If you consider a company's practice to be inspiring or have other relevant examples, please submit it to the Secretariat via [reasecretariat@ser.nl](mailto:reasecretariat@ser.nl) If you think a specific case is not a good practice, please let the Secretariat know with the reasoning behind it.
- The examples are categorized into 6 due diligence steps. Per each due diligence step, practices are showcased from both wind and solar sector, to make it relevant for both sectors. Currently, examples from wind sector are prevalent, as this sector has more documented due diligence processes.

## Step 1: Embed responsible business conduct into policies and management systems:

This section contains selected policies (human rights, climate, biodiversity, labour policies, supplier codes and etc.) and management systems (trainings, commitment from top and etc.) from wind and solar sector.

### Wind sector:

#### 1.1 Human Rights Policy | Vattenfall

**Why:** it is very comprehensive, result of stakeholder engagement, yearly updated.

The human rights policy was developed following UNGP guidelines, a review of best practices, and multiple rounds of consultation with internal and external experts, and it forms the basis of Vattenfall's human rights efforts. It is updated on a yearly basis and is approved by the Board of Directors.

**More information:** [Human Rights Policy \(vattenfall.com\)](https://www.vattenfall.com)

#### 1.2 Group Climate Change Policy | SSE Renewables

**Why:** comprehensive policy with specific targets on climate for company itself, as well as targets towards its value chain, with a specific focus on just transition and commitment to transparency.

**More information:** [PO-GRP-001 Group Climate Change Policy \(sse.com\)](https://www.sse.com)

#### 1.3 Biodiversity Policy | Eneco

**Why:** their commitment is strong because they have shared how they calculated the estimated annual costs and they have hired ecologists.

For future projects, Eneco will go beyond legal compliance by investing in additional measures to achieve net positive. In doing so, Eneco will invest in nature recovery based on measurements and valuations leading to net positive impacts. Nature recovery thereby is designed as packages tailored to achieve habitat improvement for impacted species in such way that a population increase of impacted species can be expected. Also, Eneco will continue to adhere to the mitigation hierarchy and do all mitigation and compensation that is needed to be legally compliant. Based on the illustrative 2022-2026 pipeline and with assumptions and calculations the estimated total annual (assets in preparation) costs are € 1,772,919 per year, assuming 5% net gain. After the workshop with experts the decision was made to also calculate the costs for a 10% biodiversity net gain. The costs of 10% net gain are estimated on € 1,872,937 per year. Difference between 5 and 10% is rather small.

**More information:** [eneco\\_biodiversity\\_ambition\\_executive\\_summary\\_v2.pdf](https://www.eneco.com)

#### 1.4 Biodiversity Commitment | Siemens Gamesa

**Why:** At OEM level they have committed to protect biodiversity and have net positive impact. It lists 6 specific commitments on biodiversity. 1) managing biodiversity across operations in all countries/regions; 2) mainstreaming biodiversity management along company's supply chain; 3) fostering innovation and research through the life cycle of

wind turbines; 4) reporting and communication; 5) training and awareness; 6) adopting an integrated approach to biodiversity, circular economy and climate change.

**More information:** [Environment](#)

### 1.5 Offshore wind biodiversity policy | Orsted

**Why:** It provides clear principles for protecting biodiversity during choosing the wind farm location, during the construction phase and lastly during operational phase of wind farm. It emphasizes stakeholder engagement and it also commits to collaborate with authorities, industry peers, environmental NGOs, nature conservation groups, charities and universities.

**More information:** [orsted-biodiversity-policy.pdf](#)

### 1.6 Uniting action on climate and biodiversity | Orsted

**Why:** comprehensive document providing information about Orsted's biodiversity targets, actions that it has taken to enhance biodiversity, biodiversity projects across its global portfolio and different case studies, call for action for others to step up on climate and biodiversity. Orsted is working together with others on Biodiversity NPI measurement framework.

**More information:** [orsted-paper\\_biodiversity\\_sep-2023\\_web.pdf](#)  
([orstedcdn.azureedge.net](#))

### 1.7 Biodiversity Policy | RWE

**Why:** it commits to go beyond regulatory compliance for a net-positive impact on biodiversity by 2030, commits to collaborate with stakeholders, integrates biodiversity in strategic decision-making processes.

**More information:** [RWE Biodiversity Policy](#)

### 1.8 Code of Conduct for business partners | Orsted

**Why:** Aside from human rights and environmental expectations, it also sets clear expectations on biodiversity. On Grievance Mechanism, it goes further than just requiring a complaint mechanism, it also puts expectations on remediation, making GM accessible to all rightsholders, avoidance of retaliation, not impeding access of workers to other GMs

**More information:** [orsted-code-of-conduct-for-business-partners-october-2022-english.ashx](#) ([orstedcdn.azureedge.net](#))

### 1.9 Global labour and employment rights policy | Orsted

**Why:** It provides transparent and clear commitments of Orsted on employment rights. It goes beyond the ILO's Declaration on Fundamental Principles and Rights at work. There is a focus on inclusivity, engagement, social protection.

**More information:** [global-labour-and-employment-rights-policy.pdf](#)  
([orstedcdn.azureedge.net](#))

### 1.10 Training for Suppliers | RWE

**Why:** it shows shared responsibility of the company for supply chain due diligence.

**More information:** [supplier-training-human-rights.pdf \(rwe.com\)](#)

### 1.11 Supply Chain Sustainability School | SSE Renewables, Shell, Mitsubishi, Siemens

**Why:** it is collaborative sustainability school on environmental, social and economic topics that can be offered to the suppliers.

**More information:** [The Value of Membership | Supply Chain Sustainability School \(supplychainschool.co.uk\)](#)

### 1.12 Supplier Integrity Events | Seaway7

**Why:** Seaway7 informs and gathers input on integrity related issues from its supply base via so called integrity events.

**More information:** <https://www.facebook.com/Subsea7Official/videos/subsea7-t%C3%BCrkiye-held-its-first-supplier-integrity-event-in-may-the-event-hosted-/987607462875535/>

### 1.13 Integrity Training | GE Vernova

**Why:** It is an online training for contractors, suppliers and consultants on topics such as ethics, respectful workplace, environment, health and safety, corruption, bribery, unethical behaviour and etc.

**More information:** [Sourcing Suppliers Policy | The energy to change the world \(gevernova.com\)](#)

### 1.14 Clever Integration in Management Structure | Jan de Nul

**Why:** Jan de Nul has cleverly and effectively integrated the management of its eleven core ESG-themes in its overall structure. In this structure the sustainability team of Jan de Nul cooperates with the key-accountables of the eleven core ESG-teams. Both teams report to the sustainability committee of the organization. The committee reports on a

three months basis to the management of the organization which holds the overall responsibility.

**More information:** [Jan De Nul Group - Annual Report and Sustainability Report 2023.pdf](#) (page 56 and further).

#### 1.15 Supplier Forum | Vestas

**Why:** Vestas has annual supplier forum where they share insights, best practices, innovative approaches, collaborate to elevate sustainability performance.e

**More information:** [Supplier Sustainability \(vestas.com\)](#)

#### 1.16 Stakeholder Engagement Officer | Mitsubishi Corporation

**Why:** Mitsubishi has established the position of Chief Stakeholder Engagement Officer in order to engage in active dialogue and incorporate third-party perspectives into their growth strategies.

**More information:** [Top commitment | Sustainability Management | Sustainability & CSR | Mitsubishi Corporation \(disclosure.site\)](#)

### Solar sector:

#### 1.17 Integration of ESG in organisation | Sunrock

**Why:** it provides clear picture how different topics, such as stakeholder engagement, remediation, environment, supply chain transparency is embedded within organisation and how senior leadership is involved.

**More information:** [ESG - Sunrock \(section: How we organize ESG within Sunrock\)](#)

#### 1.18 ESG policy | GroenLeven (BayWa r.e.):

**Why:** it describes the responsibilities regarding ESG of different departments and functions within the company, including an organisational chart

**More information:** [ESG Policy BayWa r.e.](#)

#### 1.19 Supplier Code of Conduct | Sunrock

**Why:** it requires its suppliers to initiate and engage in dialogue with their workers, suppliers and other stakeholders as part of their due diligence process. It has strong commitments on remediation and grievance mechanism. It has strong commitments on biodiversity protection and circularity.

**More information:** [Sunrock-Supplier-Code-of-Conduct.pdf](#)

### 1.20 Supplier Code of Conduct | Solarwatt

**Why:** It clearly states the scope of the Code of Conduct (business partners, their upstream supply chains and affiliated companies), and consequences for suppliers that fail to adhere to the Code of Conduct (take remedial action or termination of the contract if compliance cannot be demonstrated). It also mentions a Compliance Officer where suppliers can raise concerns regarding compliance with the Code of Conduct.

**More information:** [Solarwatt Code of Conduct Business Partner](#)

### 1.21 Statement on Forced Labour | Solarwatt

**Why:** It discloses Solarwatt's policy on forced labour and the actions that it has taken to implement the policy.

**More information:** [Solarwatt MVO. Een betere schonere toekomst met zonne-energie.](#)

### 1.22 Supplier Code of Conduct | GroenLeven (BayWa r.e.)

**Why:** It contains clear expectations on forced or compulsory labour from suppliers.

**More information:** [Supplier Code of Conduct BayWa r.e.](#)

## Step 2: Identify and assess adverse impacts

This section contains selected examples of impact assessments.

### Wind sector:

#### 2.1 Human rights assessment | Vestas

**Why:** Since 2018 Vestas has been conducting corporate wide human rights assessments to identify and assess emerging human rights risks and impacts, to integrate findings into business practices and communicate about them. They have mapped salient human rights issues for their rightsholders (own workforce, workers in the value chain and affected communities).

**More information:** [Human Rights \(vestas.com\)](#)

#### 2.2 Enhancing transparency in copper | Orsted and Siemens Gamesa

**Why:** This collaboration between Orsted, Siemens Gamesa, Siemens Energy Grid Technologies and Circular created traceability of the copper used in the transformers of the wind turbines, giving visibility into the origin of the critical material.

**More information:** [Worlds First Traceability Wind Energy | Circular](#)

#### 2.3 Biodiversity Toolkit | SSE Renewables

**Why:** SSE Renewables has developed a toolkit that enables quantitative biodiversity assessments.

**More information:** [Biodiversity Net Gain | SSE Renewables](#)

### Solar sector:

#### 2.4 Supply chain transparency | Sunrock

**Why:** Sunrock discloses all its supplier names and addresses through Open Supply Hub and also on their website. This creates transparency, as well as provides external stakeholders a chance to flag an issue with Sunrock if a human rights/environmental problem is spotted in one of their suppliers.

**More information:** [Supply Chain - Sunrock](#)

#### 2.6 Biodiversity research | Novar

**Why:** this is a large scale extensive 5-year study on biodiversity in/around solar parks in the Netherlands in collaboration with the University of Groningen. It is still work in



progress, but results will be published for other solar park installers to apply the knowledge.

**More information:** <https://www.novar.nl/kennisbank/biodiversiteit-zonneparken/5-jarig-onderzoek-naar-het-effect-van-zonnepark-op-de-lokale-ecologie/> (Dutch),  
Tussenrapportage (Dutch only): [https://www.novar.nl/wp-content/uploads/2024/04/Tussenrapportage\\_Ecologie-in-zonneparken\\_2024.pdf](https://www.novar.nl/wp-content/uploads/2024/04/Tussenrapportage_Ecologie-in-zonneparken_2024.pdf)

### Step 3: Cease, prevent or mitigate adverse impacts:

This section contains a selection of activities and initiatives taken by companies to address their negative impacts on people, the environment and biodiversity.

#### Wind sector:

#### 3.1 The Rich North Sea initiative | Eneco, Vattenfall, Van Oord, Shell, Orsted and others

**Why:** it involves collaborative and innovative solutions on biodiversity and environmental management

In close collaboration with the wind and hydraulic engineering sector and science, The Rich North Sea initiative is working on strengthening underwater nature. They do this by placing and stimulating living reefs and artificial structures. They also test innovative adjustments to foundation structures and conduct scientific research.

The locations are: Eneco Luchterduinen, Gemini, Orsted, Blauwwind, Offshore Test Site, Oesterkweeklijn, Vattenfall, North Sea ReVIFES

**More information:** [De Rijke Noordzee | Onze aanpak](#)

#### 3.2 Worker welfare activities | Shell

**Why:** They have developed Worker Welfare pack to support their contractors and suppliers to better understand worker welfare risks and Shell's expectations in managing these risks.

Companies in the Shell Group operate in many different countries and regions, each with different levels of risk related to Worker Welfare. Where necessary and on a risk- basis, they will assess the contractors' capability to manage worker welfare and add requirements into high-risk contracts – which include the requirement to develop Worker Welfare management plans. These terms establish clear, minimum expectations for labour rights, including no discrimination, no forced, trafficked and child labour, ethical recruitment, freedom to change employment, access to documentation, wage and benefit agreements are respected, worker representation, access to grievance mechanisms and healthy, safe, and habitable living and working conditions. We empower the voice of the worker to express their concerns. Using a risk-based approach they will verify implementation of management plans through for example audits and site visits.

**More information:** [Worker Welfare | Shell Global](#)

#### 3.3 Circular monopiles | Sif

**Why:** Sif works towards the use of green or circular steel in the production of off-shore monopiles via cooperations with Ballast Nedam and Dillinger. Via the cooperation with Ballast Nedam it specializes in the decommissioning of obsolete and aged offshore wind

farms. The partnership with Dillinger allows the re-use or recycling of the decommissioned steel into new steel plates.

**More information:** [Sif-group | Sif signs MOU with Ballast Nedam to take on the... and Sif-group | Green deal between Sif and Dillinger will make monopiles...](#)

### 3.4 Circular blades | Vestas

**Why:** Within CETEC project (collaboration between Vestas, Olin, Danish Technological Institute and Aarhus University), a new chemical process has been discovered that makes epoxy-based turbine blades circular, without the need for changing the design or composition of blade material.

**More information:** [Blade Circularity \(vestas.com\)](#)

### 3.5 Recyclable Blade | Siemens Gamesa

**Why:** It offers comprehensive recyclable solution for blades.

**More information:** [Siemens Gamesa RecyclableBlade](#)

### 3.6 Building with Nature | van Oord

**Why:** Van Oord developed its Building with Nature program as a part of its approach to accelerate climate actions. The program is a design approach to develop nature-based solutions for water related infrastructure such as flood defenses, sustainable port development and for the restoration of ecosystems. Examples of actions which take place are coastal protection projects where sea grass rehabilitation or new mangrove forests are applied. Another example is to recycle sediment and convert it to clay for dyke reinforcement.

**More information:** [Accelerating climate actions | Van Oord](#)

### 3.7 Collaboration with IRMA | Orsted

**Why:** IRMA (Initiative for Responsible Mining Assurance) is the leading framework for socially and environmentally responsible mining.

**More information:** [Members / Partners - IRMA - The Initiative for Responsible Mining Assurance](#)

## Solar sector:

### 3.8 Fully Circular Modular PV design | Biosphere Solar

**Why:** their modular PV module design allows disassembly and therefore repair or refurbishment.

**More information:** [Biosphere Solar – a circular revolution in solar energy](#)

### 3.9 Biodiversity: EcoCertified Solar Parks | GroenLeven, Novar, Vattenfall, Eneco

**Why:** collaboration between solar sector, government and Wageningen University on biodiversity research and implementation of results by companies.

**More information:** [EcoCertified Solar Parks Progress report](#) (Dutch), [GroenLeven](#)

### 3.10 Enstall Empowers | Enstall

**Why:** Enstall teams up with nonprofits and individuals for projects which help underserved communities. These projects focus on fostering energy independence, expanding opportunities, driving economic growth. This is done for instance through free job training, supporting solar projects, promoting STEM education, providing financial assistance and etc.

**More information:** [Home - Enstall Empowers](#)

## Step 4: Track implementation and results

This section contains a selection of processes for tracking implementation and results.

### Wind sector:

#### 4.1 Tracking effectiveness and progress | Seaway7

**Why:** Subsea7, the holding of Seaway 7, sets, tracks and measures progress against human rights and environmental targets and KPI's.

**More information:** An overview of the targets used and measured can be found via: <https://www.subsea7.com/en/sustainability/our-priorities-and-focus-areas/labour-practices-and-human-rights.html> and via: [Ecological Impacts \(subsea7.com\)](#)

#### 4.2 Monitoring impacts | TKF

**Why:** TKF measures and reports on impacts and progress on a number of sustainability issues. Issues include progress towards net-zero emissions, reuse of waste, energy reduction and diversity targets. Progress is substantiated via certifications which include the CSR Performance Ladder, ISO14001, ISO45001 and the Science Based Target Initiative.

**More information:** [Sustainability - TKF \(Twentsche Kabelfabriek\)](#).

#### 4.3 Tracking salient risks| Equinor

**Why:** Equinor has developed indicators for internal monitoring the impact of their efforts to address forced labour conditions in their supply chains.

**More information:** [abad63a4e316dc251eef1d1eedbd6407a2c640f.pdf](#) (section 6)

### Solar sector:

#### 4.4 Cradle to Cradle Certificate | Solarwatt

**Why:** This is a certification for sustainable production regarding different sustainability aspects (circularity, environment, social).

**More information:** <https://solarwatt.nl/over-ons/cradle-to-cradle-certificaat/> (Dutch); <https://www.solarwatt.com/company/sustainability/cradle-to-cradle> (English)

## Step 5: Communicating how impacts are addressed

This section contains a selection of sustainability reporting and external communication/engagement with stakeholders.

### Wind sector:

#### 5.1 Human Rights Progress Report | Vattenfall

**Why:** it fulfills Step 5 of the due diligence cycle by providing insight into company's human rights risks, company's level of management per risk, KPIs, progress achieved, challenges and next steps. It provides for transparency about company's approach.

**More information:** [Vattenfall Human Rights Report 2023](#)

#### 5.2 Just Transition Measuring Progress Report | SSE Renewables

**Why:** it communicates the impacts of SSE Renewables's 20 principles for a just transition across its business activities and discloses progress against its Just Transition Strategy.

**More information:** [just-transition-measuring-progress-report-2023.pdf \(sse.com\)](#)

#### 5.3 Engagement with Trade Unions | SSE Renewables

**Why:** There is a regular engagement at group level, as well as different projects with trade unions.

**More information:** [PO-GRP-007 Group Environment Policy \(sse.com\) \(governance section\)](#)

#### 5.4 Conflict Minerals Report | GE

**Why:** the report has an appendix with the list of smelters and refiners of conflict minerals that is part of GE supply chain, their country of origin and conformity status.

**More information:** [GE Form SD 5.31.23 Exhibit 1.01](#)

### Solar sector:

#### 5.5 ESG report | PowerField

**Why:** ESG report of a SME. The report is clearly structured, has some good visuals (e.g. the upstream and downstream supply chain for scope 1-3 emissions, materiality assessment results). The report does not only describe the ESG results achieved so far, but also elaborates on the ambitions and actions that they will take to improve their ESG performance in the future.

**More information:** [Duurzaamheid en ESG - PowerField](#)

#### 5.6 Sustainability report | GroenLeven (Baywa r.e.)

**Why:** the GroenLeven report contains information about different steps in the due diligence process, for example a stakeholder mapping overview (including disclosure of key suppliers), a risk matrix with material risks for the company and a description of the

most material risks in the value chain, such as a description of the risk and approach to address it for upstream human rights impact. Idem for the BayWa report (mother company of GroenLeven).

**More information:** [Sustainability Report 2022 GroenLeven](#), [Sustainability Report 2022 BayWa r.e.](#)

### 5.7 ESG report | Sunrock

**Why:** ESG report of a SME. It provides very good information about the challenges in responsible sourcing and actions that SME can take to address those.

**More information:** [ESG Reports - Sunrock](#)

### 5.8 Engagement with rightsholders | Sunrock

**Why:** Sunrock organized a stakeholder engagement session with the Uyghur community members in their company in February 2024, where they invited their competitors, suppliers, partners to engage in dialogue and deepen their insights.

**More information:** [Our participant Sunrock | IRBC Agreements \(imvoconvenanten.nl\)](#)

### 5.9 Sustainability report | Enstall

**Why:** It provides insights into current and planned activities related to 3 themes: people (product quality and safety, employee health, safety and wellbeing, diversity, equity and inclusion), climate and circularity (carbon and climate, circularity), transparency (supply chain and engagement, sustainability governance).

**More information:** [2023 Sustainability Report \(enstall.com\)](#)

## Step 6: Providing for or cooperating in remediation when appropriate

This section covers a selection of grievance mechanisms and remediation processes.

### Wind sector:

#### 6.1 Operational-Level Grievance Mechanism | Vestas

**Why:** It is open for all external stakeholders, it commits to collaborate with parties if the stakeholders chooses to seek remedy outside the GM, protects against retaliation, defines clear roles and responsibilities, scope; commits to UNGPS, best practice standards, provides a clear flowchart, describes each process stage with clarity, provides for lessons learnt and monitoring for human rights due diligence and prevention of recurring issues.

**More information:** [Human Rights \(vestas.com\)](https://vestas.com)

#### 6.2 Global Framework Agreement on Social Responsibility| Siemens Gamesa<sup>1</sup>

**Why:** The Framework Agreement is between Siemens Gamesa Renewable Energy, the labour representatives and IndustriALL Global Union. It has provisions on fundamental labour and social rights, disputes provisions. There is a commitment for allowing all workers and trade unions of Siemens Gamesa Group and those of their suppliers, subcontractors and business partners to report any non-compliance or violation via a whistleblower hotline.

**More information:** [4105\\_001.pdf \(industriall-union.org\)](https://industriall-union.org)

#### 6.3 Speak-up Channel | Seaway7

**Why:** Seaway7 operates a speak-up channel or grievance mechanism that is open to both internal and external stakeholders.

The channel is operated by an external party (Safecall). Grievances can be filed in various ways (email and telephone), in various countries and in multiple languages.

**More information:** [PO-GL-COR-003- -Speak-Up-Policy-1.pdf \(seaway7.com\)](https://seaway7.com)

### Solar sector:

#### 6.4 Speak-up policy | Sunrock

**Why:** In addition to having a great/ robust internal system, they actively promote external channels, if internal channels fail.

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<sup>1</sup> Similar Framework Agreements also exist with Equinor and Total Energies. However, the Agreements have an end date and on the website it was not clear whether the Agreements with Equinor (expired in 2018) and Total Energies (expired in 2019) were renewed. The Agreement with Siemens Gamesa is also for 4 years and was signed in 2019 Nov. It is also unclear whether the Agreement is still in force in 2024. Nonetheless, as the monitoring covers year 2023, we have chosen to feature it. We consider Framework Agreements as good practices and we hope that the companies will renew these agreements.



This includes the entity, type of issues, and how you can reach them in the various countries Sunrock is active in.

**More information:** [ESG Complaints & concerns - Sunrock](#)

### 6.5 Whistleblower system | BayWa (GroenLeven)

**Why:** It is open to employees, suppliers, people affected in the supply chain. The scope covers human rights, environment and broad range of other topics.

**More information:** [BayWa r.e. Whistleblower System: Submit hint \(compcor.de\)](#)

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