



ISS ESG

COLLABORATIVE
ENGAGEMENT



NORM-BASED ENGAGEMENT



Q3 2022 Progress Report

(For the period of 1 July 2022 to 30 September 2022)

October 2022



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INTRODUCTION

The Norm-Based Engagement Quarterly Report for Q3 2022 consists of five parts. The first part provides a description of ISS ESG's Norm-Based Engagement Solution, which is conducted on behalf of investors with companies that have been assessed under ISS ESG's Norm-Based Research to be facing alleged or verified severe, systematic, or systemic failures to respect international norms and guidelines on responsible business conduct.

The latter sections of the report provide details of progress of engagement activities that were carried out on behalf of institutional investors in Q3 2022:

- The second part of the report presents summary statistics of engagements initiated in Q3 2022.
- The third part highlights notable engagements carried out in Q3 2022.
- The fourth part provides summaries of engagement responses received in Q3 2022.
- The fifth part provides an overview of responsiveness to letters sent out in Q3 2022, as of 30 September 2022.

The detailed engagement reports, timelines and documentation for the individual companies listed in the report are available to Norm-Based Engagement clients online via the [Pooled Engagement Tool](#).

ISS ESG NORM-BASED ENGAGEMENT APPROACH

ISS ESG’s Norm-Based Engagement Solution facilitates engagement with issuers on behalf of clients who would like to encourage corporate disclosure of efforts taken to manage or mitigate the environmental and social risks connected to business activities or operations. The Norm-Based Engagement Solution enables participating asset owners and managers to wield more influence than through solo engagements, while saving time and resources.

INITIATING ENGAGEMENT

Through ISS ESG’s Norm-Based Engagement Solution, clients can focus on companies that are assessed under ISS ESG Norm-Based Research to be involved in alleged or verified severe, systematic, or systemic failures to respect international norms. Engagement under the solution is preceded by in-depth research and fact-finding dialogues with companies and stakeholders. Through these feasibility studies, ISS ESG identifies gaps in company disclosure and assesses whether investor dialogue is an appropriate means to reach the objectives set by the clients. Influential factors include an estimation of the company’s level of responsibility, steps it has taken to mitigate the possible failure to respect a norm, and availability of both stakeholder and expert sources to facilitate constructive dialogue.

At the outset of engagement, clear and actionable objectives are defined on the basis of expectations regarding the company’s ability to address shortcomings in the context of its specific business sector and relevant industry standards. These objectives fall under four key categories (Disclosure, Implementation, Remediation, Termination) and progress is measured against four milestones (No measure announced, Commitment expressed, Measures initiated, Credible measures adopted).

Information provided by the company through the dialogue and interactions under the Norm-Based Engagement process is assessed against the objectives established at the outset of engagement and then a decision is taken on the outcome of the engagement. Where the fulfilment of the objectives has been met and a determination made that the controversy, or the risk thereof, has been resolved, the engagement will be closed. If there is insufficient information to determine whether the fulfilment of objectives have been met, the engagement will be extended. Alternatively, where there is a poor outlook for the achievement of objectives for the engagement, the engagement will be discontinued.

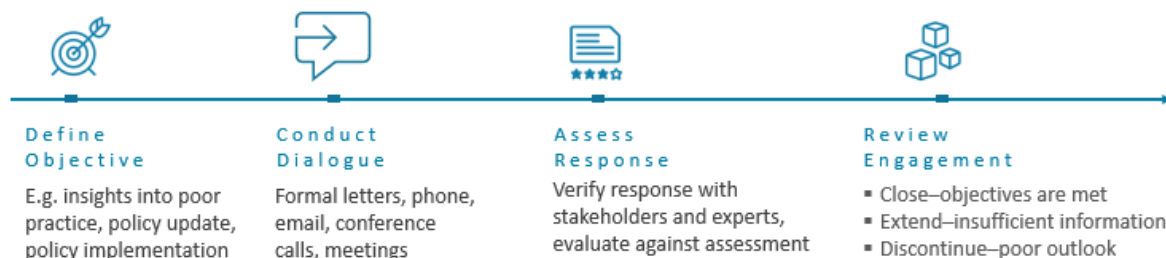


Figure 1: Simplified Norm-Based Engagement process.

CONDUCTING EFFECTIVE ENGAGEMENT DIALOGUE

Norm-Based Engagement aims to build relationships that facilitate constructive dialogue, enabling investors to exercise their influence as owners. ISS ESG’s Norm-Based Engagement approach encourages companies to elaborate on efforts taken to design and implement better risk management systems to minimize the risk for re-occurrence of failures to respect international norms. Through the solution, information is sought on whether a company has proven successful in implementing a genuine reduction in risk.

ELICITING RESPONSES FROM NON-RESPONSIVE COMPANIES

Over time, responsiveness is noted with most companies with which engagement is sought. Others require repeated follow-ups to respond, and some steadfastly fail to respond to investor concerns. To address these challenges in communication, regular and courteous follow-up is built into the Norm-Based Engagement approach. Once every effort has been made to engage both Investor Relations and a company’s Executive Management, the feasibility of engagement is re-evaluated.

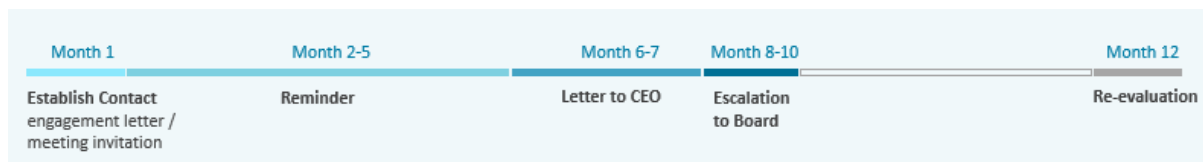


Figure 2: Simplified Norm-Based Engagement timeline.

The engagements are categorised under the four United Nations (UN) Global Compact areas: human rights, labour rights, environment, and anti-corruption. Throughout this document, these areas are depicted as follows:

UN GLOBAL COMPACT PRINCIPLES	NORM AREA	
1-2		Human Rights
3-6		Labour Rights
7-9		Environment
10		Anti-Corruption

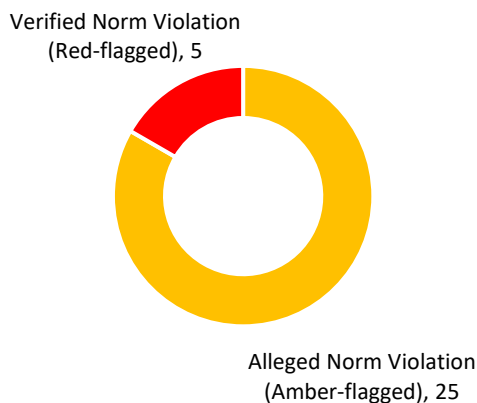
STATISTICS FOR ENGAGEMENT INITIATED IN Q3 2022

In Q3 2022, ISS ESG initiated Norm-Based Engagement on behalf of investors with 30 companies, covering 45 individual ESG topics.

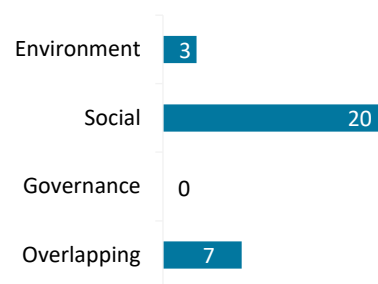
Of these 30 companies, five were Red flagged and the remainder Amber flagged, according to ISS ESG’s Norm-Based Research methodology. By 30 September 2022, ISS ESG had received responses from 13 of the 30 companies to which investor enquiries had been sent on 15 July 2022. This constitutes an overall response rate of 43 percent.

To assist investors with their reporting, the statistics presented below are based on the companies with which engagement was initiated in Q3 2022.

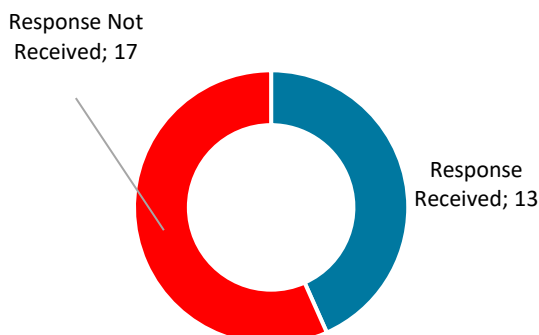
Verified or Alleged Failure to Respect Established Norms



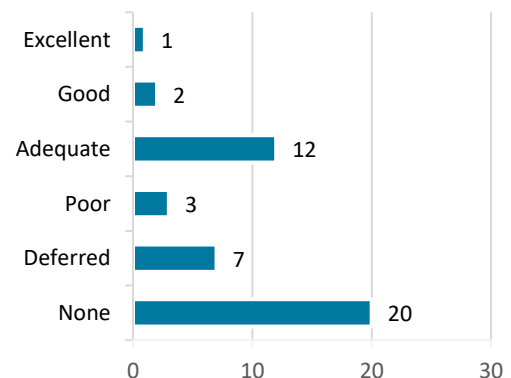
ESG Area Breakdown



Response Rate



Quality of Participation



Note: Participation quality definitions: **Excellent:** Company has fully addressed topics and there is strongly positive development in the engagement. **Good:** Company has replied and addressed the topics. **Adequate:** Company has responded, but not fully. **Poor:** Company responded but did not address the topics. **Deferred:** Company has requested more time to respond. **None:** No response received.

NOTABLE ENGAGEMENT ACTIVITY IN Q3 2022

The cases below are examples of notable Norm-Based Engagement activity carried out on behalf of investors in Q3 2022.


<p>TotalEnergies SE</p>	<p>ISIN FR0000120271</p>
<p>THEME Adequate standard of living, Environment impacts</p>	<p>LOCATION Uganda, Nigeria</p>
<p>SUMMARY</p>	<p>In Q3 2022, the pool of investors shared a letter with TotalEnergies SE (Total) regarding the company's alleged failure to respect the right to an adequate standard of living at the Tilenga oil project and the East African Crude Oil Pipeline (EACOP) in Uganda and its failure to prevent soil and water pollution and remediate environmental impacts in Nigeria.</p> <p>Through a virtual meeting scheduled in September 2022, Total shared that as a result of the Tilenga oil and EACOP projects and as part of its Resettlement Action Plan (RAP), less than 4% of Project Affected People (PAP) were relocated from their primary dwelling and offered a choice of either a new dwelling or monetary compensation. The company explained how it deploys and implements its RAPs and highlighted that following the launch of its first RAP in 2018, it observed issues such as a misunderstanding on the cut-off date, which led the PAPs to miss a key harvest season. In response, Total arranged information sessions with the PAPs clarifying the right to harvest after the cut-off date until the PAPs receive their “notice to vacate”. Furthermore, the company shared its livelihood restoration support program as well as its community grievance mechanisms that enable PAPs to raise complaints through a variety of access points such as a toll-free number and its community liaison officers who engage with local communities.</p> <p>Regarding the environmental impacts controversy in Nigeria, the company shared that despite collaborating with the operator Shell Plc to implement a leak protection system on a part of the pipeline, it has paused its oil exports through the pipeline since the beginning of 2022, and is in the process of divesting its share in all of its 16 oil licenses of the Shell Petroleum Development Company of Nigeria Joint Venture (SPDC JV). In terms of the restoration of Ogoniland through the Hydrocarbon Pollution Restoration Project, Total stated that it is committed to financing its share of \$90 million but is advocating for more transparency, regular audits on the projects and is committed to the 37 restoration programs.</p> <p>ISS ESG notes the details Total has provided in this engagement, based on which the company is assessed to have made positive progress, in particular with regard to the disclosure of relevant information. ISS ESG continues to monitor the efficacy of the ongoing remediation to ensure that the right to adequate standard of living is respected at Total’s operations in Uganda. Additionally, ISS ESG continues to monitor further developments in Nigeria, particularly if the company’s oil spill prevention and remediation efforts lead to a reduction of volume and severity of oil spills at SPDC JV operations.</p>


Sibanye Stillwater Ltd.		ISIN ZAE000259701
THEME Adequate standard of living, Workplace health and safety	LOCATION South Africa	
SUMMARY	<p>In Q3 2022, the pool of investors shared a letter with Sibanye Stillwater Ltd. (Sibanye) regarding the company's alleged failure to respect the right to an adequate standard of living at the Marikana platinum mine and alleged failure to respect the right to safe and healthy working conditions in South Africa.</p> <p>In August 2022, Sibanye provided a detailed written response to the investor enquiry. In terms of the living standards allegations, the company provided an update on its progress in meeting its Social and Labour Plans for the Marikana operations, as well as updates on ongoing measures like rezoning of the Marikana Extension 13 and Nkaneng informal estimations settlement into formal townships, and upgrading the Informal Settlements Programme to ensure housing, water and livelihood concerns of the community are being addressed. Additionally, regarding regular consultations with impacted communities, Sibanye highlighted measures like the Marikana Renewal programme and Pitso renewal series which ensure multistakeholder engagements, including an updated community complaint and grievance procedure for all its operations.</p> <p>Regarding the health and safety allegations, Sibanye shared updates on its ongoing safety programmes such as Eliminating Fatalities – Life Saving Behavior Commitment Journey 2022 and its Zero Harm goal to prevent fatalities in risk areas. Additionally, the company highlighted the independent review of its safety strategies including the International Council on Mining and Metals’ principles to which the company subscribes, its achievement of ISO 45001 and 14001 standards across its operations, and information on grievance mechanisms available to workers, as well as worker representation at various safety committee meetings.</p> <p>ISS ESG notes the details Sibanye has provided in this engagement, based on which the company is assessed to have made positive progress, in particular with regard to disclosure of relevant information. ISS ESG continues to monitor the efficacy of the remediation to ensure that the right to adequate standard of living is respected at its Marikana platinum mine, as well as with regard to the efficacy of measures implemented to address health and safety concerns across its mining operations in South Africa.</p>	

COMPANY RESPONSES RECEIVED IN Q3 2022

The following pages list responses received during Q3 2022, for engagements that commenced in Q3 2022 or earlier. ISS ESG received responses from 22 companies, related to 32 engagement topics. The tables present the progress achieved against the engagement goals established for each company and topic. Deferred responses – in which the company acknowledged receiving the engagement letter but did not provide responses to the provided questions, committing to do so in the future – are not included.

Adani Ports & Special Economic Zone Ltd.		ISIN INE742F01042
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q2 2022
THEME Human rights: Indigenous rights, Stakeholder consultation		LOCATION Australia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced


Aegea Saneamento e Participacoes SA		ISIN BRAEGPDBS020
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q1 2022
THEME Corruption: Bribery		LOCATION Brazil
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated


Amazon.com, Inc.		ISIN US0231351067
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.5: Achieve full and productive employment and decent work for all women and men; 8.8:	QUARTER Q3 2022

Protect labour rights and promote safe and secure working environments for all workers SDG 10: Reduced Inequalities; 10.1: Achieve and sustain income growth		
THEME Labour rights: Union rights		LOCATION Germany
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION No measures announced
THEME Labour rights: Union rights		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION No measures announced
THEME Labour rights: Working conditions		LOCATION United Kingdom
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION No measures announced
THEME Labour rights: Working conditions		LOCATION Italy
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION No measures announced
THEME Labour rights: Working conditions		LOCATION Spain
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed
THEME Corruption: Anti-competitive behaviour		LOCATION Italy
	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced

GOALS SET & PROGRESS ACHIEVED	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced
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Anheuser-Busch InBev SA/NV		ISIN BE0974293251
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q3 2022
THEME Labour rights: Union rights		LOCATION Peru
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed

AntarChile SA		ISIN CLP0362E1386
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q3 2022
THEME Human rights: Indigenous rights, Stakeholder consultation		LOCATION Chile
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Commitment expressed


Carrefour SA		ISIN FR0000120172
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour	QUARTER Q2 2022
THEME Labour rights: Forced labour, Modern slavery		LOCATION China


GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Commitment expressed


Companhia Energetica de Minas Gerais SA		ISIN BRCMIGACNPR3
	<p>SDG ALIGNMENT</p> <p>SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services</p> <p>SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands, 15.5: Protect and prevent the extinction of threatened species</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels</p>	QUARTER Q2 2021
THEME Environment: Biodiversity, Environmental Impacts		LOCATION Brazil
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated
THEME Human rights: Indigenous rights, Forced displacement		LOCATION Brazil
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

FAST RETAILING CO., LTD.		ISIN JP3802300008
	<p>SDG ALIGNMENT</p> <p>SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour</p>	QUARTER Q2 2022
THEME Labour rights: Forced labour, Modern slavery		LOCATION China
	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated


GOALS SET & PROGRESS ACHIEVED	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Commitment expressed
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FGV Holdings Bhd.		ISIN MYL522200004
	SDG ALIGNMENT SDG 15: Life on Land; 15.2: Sustainable management of all types of forests	QUARTER Q1 2022
THEME Environment: Biodiversity, Deforestation		LOCATION Indonesia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Commitment expressed


HD HYUNDAI Co., Ltd.		ISIN KR7267250009
	SDG ALIGNMENT SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q3 2022
THEME Labour rights: Workplace health and safety		LOCATION South Korea
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated


HUGO BOSS AG		ISIN DE000A1PHFF7
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q2 2022
THEME Labour rights: Union rights		LOCATION Turkey


GOALS SET & PROGRESS ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION No measures announced
THEME Labour rights: Forced labour, Modern slavery		LOCATION China
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced

HYUNDAI ENGINEERING & CONSTRUCTION CO., LTD.		ISIN KR7000720003
	SDG ALIGNMENT SDG 16: Peace, justice, and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q2 2022
THEME Corruption: Bribery		LOCATION Indonesia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION No measures announced


Hyundai Heavy Industries Co., Ltd.		ISIN KR7329180004
	SDG ALIGNMENT SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q3 2022
THEME Labour rights: Workplace health and safety		LOCATION South Korea
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated


Korea Shipbuilding & Offshore Engineering Co., Ltd.		ISIN KR7009540006
	SDG ALIGNMENT SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q3 2022
THEME Labour rights: Workplace health and safety		LOCATION South Korea
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated



KT Corp.		ISIN KR7030200000
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q1 2022
THEME Corruption: Bribery		LOCATION South Korea
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated

Lyft, Inc.		ISIN US55087P1049
	SDG ALIGNMENT SDG 10: Reduced Inequalities; 10.1: Achieve and sustain income growth SDG 8: Decent Work and Economic Growth; 8.5: Achieve full and productive employment and decent work for all women and men; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q1 2022
THEME Labour rights: Working conditions		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE	REMEDIAL ACTION


	Commitment expressed	No measures announced
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Samvardhana Motherson International Limited		ISIN INE775A01035
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q2 2022
THEME Labour rights: Union rights		LOCATION Mexico
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

Shell Plc		ISIN GB00BP6MXD84
	SDG ALIGNMENT SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes SDG 13: Climate Action; 13.3: Improve education, awareness-raising and human and institutional capacity on climate change SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands	QUARTER Q3 2022
THEME Environment: Pollution		LOCATION Nigeria
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated
THEME Environment: Climate change impacts		LOCATION Australia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Commitment expressed

Sibanye Stillwater Ltd.		ISIN ZAE000259701
	<p>SDG ALIGNMENT</p> <p>SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services</p> <p>SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages</p> <p>SDG 6: Clean Water and Sanitation; 6.1: Universal and equitable access to safe and affordable drinking water</p> <p>SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers</p> <p>SDG 11: Sustainable Cities and Communities; 11.1: Access for all to adequate, safe and affordable housing</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels,</p>	<p>QUARTER Q3 2022</p>
	<p>THEME Labour rights: Workplace health and safety</p>	<p>LOCATION South Africa</p>
<p>GOALS SET & PROGRESS ACHIEVED</p>	<p>DISCLOSURE Commitment expressed</p>	<p>IMPLEMENTATION OF POLICIES Measures initiated</p>
	<p>TERMINATION OF PRACTICE Commitment expressed</p>	<p>REMEDIAL ACTION Measures initiated</p>
<p>THEME Human rights: Adequate standard of living</p>		<p>LOCATION South Africa</p>
<p>GOALS SET & PROGRESS ACHIEVED</p>	<p>DISCLOSURE Measures initiated</p>	<p>IMPLEMENTATION OF POLICIES Commitment expressed</p>
	<p>TERMINATION OF PRACTICE Commitment expressed</p>	<p>REMEDIAL ACTION Measures initiated</p>
STRABAG SE		ISIN AT000000STR1
	<p>SDG ALIGNMENT</p> <p>SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services</p> <p>SDG 6: Clean Water and Sanitation; 6.1: Universal and equitable access to safe and affordable drinking water</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels</p>	<p>QUARTER Q2 2022</p>
	<p>THEME Human rights: Access to water / sanitation</p>	<p>LOCATION Chile</p>

GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed

Texhong Textile Group Limited		ISIN KYG876551170
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour	QUARTER Q3 2022
THEME Labour Rights: Forced labour, Modern slavery		LOCATION China
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION N/A

TotalEnergies SE		ISIN FR0000120271
	SDG ALIGNMENT SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services SDG 2: Zero Hunger; 2.1: End hunger and ensure access by all people to safe, nutritious, and sufficient food SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials SDG 11: Sustainable Cities and Communities; 11.1: Access for all to adequate, safe, and affordable housing SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands SDG 16: Peace, justice, and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory, and representative decision-making at all levels	QUARTER Q3 2022
THEME Environment: Oil spill, Pollution		LOCATION Nigeria
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated

GOALS SET & PROGRESS ACHIEVED	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated	
THEME Human rights: Indigenous rights, Forced displacement			LOCATION Uganda
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated	
GOALS SET & PROGRESS ACHIEVED	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated	

RESPONSIVENESS TO Q3 2022 ENGAGEMENT LETTERS

The following table provides an overview of the responsiveness to the engagement initiated in this quarter, as of 30 September 2022. Companies that had yet to respond to the initial engagement letters were sent reminder notifications on 12 October 2022. Continued non-response to the reminders will lead to escalation of engagement attempts to the CEO and then the Board level as described under the section, “Engagement Cycle,” earlier in this document.

ISSUER	ISIN	ESG AREA BREAKDOWN	RESPONSE RECEIVED
Amazon.com, Inc.	US0231351067	Labour rights	Yes
Anheuser-Busch InBev SA/NV	BE0974293251	Labour rights	Yes
AntarChile SA	CLP0362E1386	Human rights	Yes
Barrick Gold Corporation	CA0679011084	Human rights	Yes
Beowulf Mining Plc	GB0033163287	Human rights	No
COFCO Sugar Holding Co. Ltd.	CNE000000LH8	Labour rights	No
CoreCivic, Inc.	US21871N1019	Labour rights, Human rights	Yes
Empresas Copec SA	CLP7847L1080	Human rights	No
Eni SpA	IT0003132476	Environment	Yes
G-III Apparel Group, Ltd.	US36237H1014	Labour rights	No
Grupo Mexico S.A.B. de C.V.	MXP370841019	Human rights	No
Hangzhou Hikvision Digital Technology Co., Ltd.	CNE100000PM8	Human rights	No
Hankook & Company Co., Ltd.	KR7000240002	Labour rights	No
Hankook Tire & Technology Co., Ltd.	KR7161390000	Labour rights	No
HD HYUNDAI Co., Ltd.	KR7267250009	Labour rights	Yes
Hyundai Heavy Industries Co., Ltd.	KR7329180004	Labour rights	Yes
Iflytek Co., Ltd.	CNE100000B81	Human rights	No
JBS SA	BRJBSSACNOR8	Labour rights	No
Korea Shipbuilding & Offshore Engineering Co., Ltd.	KR7009540006	Labour rights	Yes
Lands' End, Inc.	US51509F1057	Labour rights	No
LG Electronics, Inc.	KR7066570003	Labour rights	No
Shandong Gold Mining Co., Ltd.	CNE1000036N7	Environment	No
Shell Plc	GB00BP6MXD84	Environment	Yes

Sibanye Stillwater Ltd.	ZAE000259701	Labour rights	Yes
Starbucks Corporation	US8552441094	Labour rights	No
Texhong Textile Group Limited	KYG876551170	Labour rights	Yes
The GEO Group, Inc.	US36162J1060	Labour rights, Human rights	No
TotalEnergies SE	FR0000120271	Environment, Human rights	Yes
Xiamen Meiya Pico Information Co., Ltd.	CNE100001120	Human rights	No
Zhejiang Dahua Technology Co. Ltd.	CNE100000BJ4	Human rights	No

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