



ISS ESG

COLLABORATIVE
ENGAGEMENT



NORM-BASED ENGAGEMENT



Q4 2022 Progress Report

January 2023

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INTRODUCTION

The Norm-Based Engagement Quarterly Report for Q4 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 Q4 2022:

- The second part of the report presents summary statistics of engagements initiated in Q4 2022.
- The third part highlights notable engagements carried out in Q4 2022.
- The fourth part provides summaries of engagement responses received in Q4 2022.
- The fifth part provides an overview of responsiveness to letters sent out in Q4 2022, as of 31 December 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 signatory investors 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, signatory investors 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 signatory investors. 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 minimise 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

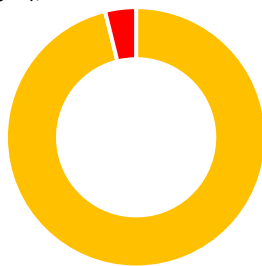
STATISTICS FOR ENGAGEMENT INITIATED IN Q4 2022

In Q4 2022, ISS ESG initiated Norm-Based Engagement on behalf of signatory investors with 26 companies, covering 36 individual ESG topics. Of these 26 companies, one was Red flagged and the remainder Amber flagged, according to ISS ESG’s Norm-Based Research methodology. By 31 December 2022, ISS ESG had received responses from 20 of the 26 companies to which investor enquiries had been sent on 18 October 2022. This constitutes an overall response rate of 77 percent. To assist participating investors with their reporting, the statistics presented below are based on the companies with which engagement was initiated in Q4 2022.

Summary charts as of 31 December 2022:

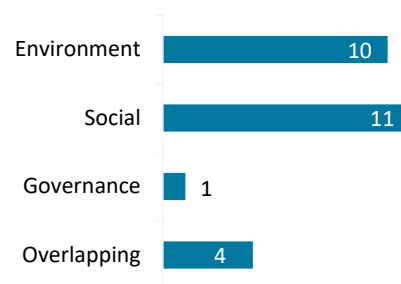
Verified or Alleged Failure to Respect Established Norms

Verified Norm Violation
(Red-flagged), 1



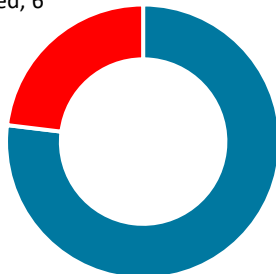
Alleged Norm Violation
(Amber-flagged), 25

ESG Area Breakdown



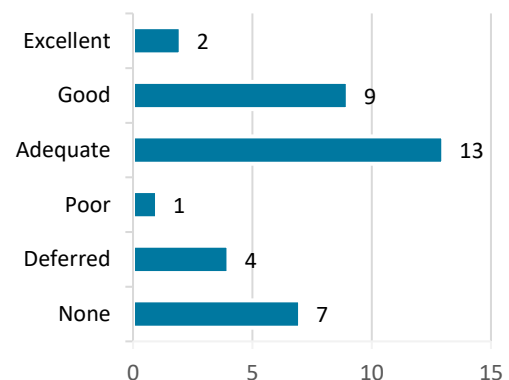
Response Rate

Response Not
Received; 6



Response
Received; 20

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 Q4 2022


The cases below are examples of notable Norm-Based Engagement activity carried out on behalf of investors in Q4 2022.


Exelon Corporation		ISIN US30161N1019
THEME Bribery	LOCATION United States	
ACTIVITY SUMMARY	<p>In Q4 2022, Norm-Based Engagement investor clients, facilitated by ISS ESG shared a letter with Exelon Corporation (Exelon) regarding the company's verified failure, undergoing remediation to prevent bribery in the United States.</p> <p>In an engagement meeting facilitated by ISS ESG in December 2022, Exelon shared detailed information regarding the status of the compliance monitoring program, stating that during the three-year probationary period, the company must submit annual confidential reports detailing its progress. So far, the company has filed two reports and its subsequent third and final report is to be submitted in June 2023, 30 days before the termination of the Deferred Prosecution Agreement (DPA) period. The company stated that the United States (U.S.) Department of Justice then has the opportunity to evaluate the completion of the DPA or take further action.</p> <p>Additionally, Exelon disclosed the measures taken to enhance its compliance program and highlighted the 2022 Annual Ethics and Compliance Report of its subsidiary Commonwealth Edison Co. to the Illinois Commerce Commission, which details the nature of its compliance program and steps taken to strengthen company-wide compliance. The company shared that it has implemented a series of policies to govern how its employees interact with public officials and that such policies require significantly more enhanced due diligence mechanisms than previously and are reviewed on a biannual basis. The measures taken by the company include the continual tracking, review and recording of any requests, referrals or recommendations that come from public officials by Exelon's audit committee and directors, the redesign of Exelon's risk assessment process, and the company's new Executive Vice President of Compliance, Audit & Risk role, which allows both the internal audit and ethics and compliance programs more effective collaboration and a stronger flow of information. Furthermore, Exelon noted that the U.S. Securities and Exchange Commission's (SEC) investigation is ongoing.</p> <p>ISS ESG notes the information Exelon has provided in this engagement, based on which the company is assessed to have positively progressed particularly with regard to the engagement goals of disclosure of relevant information and implementation of relevant policies. ISS ESG continues to monitor the efficacy of the ongoing remediation measures implemented by the company to ensure a robust compliance framework and the conclusion of the SEC's ongoing investigation.</p>	

Samsung Electronics Co., Ltd.		ISIN KR7005930003
THEME Union rights	LOCATION South Korea	
ACTIVITY SUMMARY	<p>In Q4 2022, Norm-Based Engagement investor clients, facilitated by ISS ESG shared a letter with Samsung Electronics Co., Ltd. (Samsung) regarding the company's verified failure, undergoing remediation to respect union rights in South Korea.</p> <p>In a written response in December 2022, Samsung shared the results of a third-party assessment conducted by firms approved by the Responsible Business Alliance (RBA) regarding the exercise of union rights at the company's operations in South Korea, Brazil, India, and China. During the RBA assessments of the operations, all nine facilities in four countries scored high marks and no union rights breaches were detected. Samsung shared its action plan, including a labour-management relations advisory group, to end the previously implemented 'no labour union' policy and stated that its Code of Conduct and the company's policy guarantee labour rights. In August 2021, the company signed a collective agreement with the joint bargaining team and highlighted its continuous collaborative efforts to engage with the International Trade Union and the International Union of Manufacturing Industries.</p> <p>The company has also provided additional information about its grievance channels including hotlines, on and off-line channels, and employee representative bodies. As per the company's Business Conduct Guideline, these grievance channels ensure anonymity, and no retaliation against any whistle-blowers, however, there has been no complaint filed regarding the rights to organise.</p> <p>ISS ESG notes the details Samsung has provided in this engagement, based on which the company is assessed to have taken steps towards resolving the union rights controversy and positively progressed across the engagement goals of disclosure of relevant information, implementation of relevant policies, remedial action, and termination of problematic practice. ISS ESG continues to monitor the efficacy of the measures initiated by the company to uphold freedom of association and the right to collective bargaining, and will continue to review its disclosures, along with any allegations raised by stakeholders.</p>	


COMPANY RESPONSES RECEIVED IN Q4 2022


The following pages list responses received during Q4 2022, for engagements that commenced in Q4 2022 or earlier. ISS ESG received responses from 36 companies, related to 43 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.

Accenture Plc		ISIN
		IE00B4BNMY34
	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 Q4 2022
THEMES		LOCATION
Labour rights: Working conditions, Workplace health and safety		United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE	IMPLEMENTATION OF POLICIES
	No measures announced	Commitment expressed
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	No measures announced


AES Andes SA		ISIN
		CL0002694637
	SDG ALIGNMENT SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services, SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels, SDG 6: Clean Water and Sanitation; 6.1: Universal and equitable access to safe and affordable drinking water	QUARTER Q2 2022
THEMES		LOCATION
Human rights: Access to water / sanitation, Living standards, Stakeholder consultation		Chile
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Commitment expressed


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
THEMES Labour rights: Union rights		LOCATION Peru
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated


Barclays PLC		ISIN GB0031348658
	SDG ALIGNMENT SDG 17: Partnerships for the Goals; 17.1: Strengthen domestic resource mobilization	QUARTER Q4 2022
THEMES Human rights: Tax irregularities		LOCATION United Kingdom
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced


Bayer AG		ISIN DE000BAY0017
	SDG ALIGNMENT SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species	QUARTER Q2 2022
THEMES Environment: Biodiversity, Environmental impacts		LOCATION Several countries
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

Beowulf Mining Plc		ISIN GB0033163287
	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
THEMES Human rights: Indigenous rights, Stakeholder consultation		LOCATION Sweden
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Commitment expressed

Carnival Corporation		ISIN PA1436583006
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 14: Life Below Water; 14.2: Sustainably manage and protect marine and coastal ecosystems, SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials	QUARTER Q4 2022
THEMES Environment: Water pollution		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated


Carnival Plc		ISIN GB0031215220
	SDG ALIGNMENT	QUARTER
	SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 14: Life Below Water; 14.2: Sustainably manage and protect marine and coastal ecosystems, SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials	Q4 2022
THEMES Environment: Water pollution		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated


Carrefour SA		ISIN FR0000120172
	SDG ALIGNMENT	QUARTER
	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	Q2 2022
THEMES Labour rights: Forced labour		LOCATION China
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Commitment expressed


CMOC Group Ltd.		ISIN CNE100000114
	SDG ALIGNMENT SDG 10: Reduced Inequalities; 10.1: Achieve and sustain income growth, 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; 8.5: Achieve full and productive employment and decent work for all women and men, 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
THEMES Labour rights: Living wage, Union rights, Working conditions, Workplace health and safety		LOCATION Congo (Democratic Republic)
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

Coca-Cola Europacific Partners Plc		ISIN GB00BDCPN049
	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 Q4 2022
THEMES Labour rights: Union rights		LOCATION Indonesia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated

CoreCivic, Inc.		ISIN
		US21871N1019
	<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> <p>SDG 10: Reduced Inequalities; 10.7: Facilitate orderly, safe, regular and responsible migration, SDG 16: Peace, justice and Strong Institutions; 16.1: Reduce all forms of violence and related death rates everywhere</p>	<p>QUARTER</p> <p>Q3 2022</p>
THEMES		LOCATION
Human rights: Human rights due diligence		United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
GOALS SET & PROGRESS ACHIEVED	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Measures initiated
THEMES		LOCATION
Labour rights: Forced labour		United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Commitment expressed	Commitment expressed
GOALS SET & PROGRESS ACHIEVED	TERMINATION OF PRACTICE	REMEDIAL ACTION
	No measures announced	Commitment expressed


Eni SpA		ISIN
		IT0003132476
	<p>SDG ALIGNMENT</p> <p>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 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials</p>	<p>QUARTER</p> <p>Q3 2022</p>
THEMES		LOCATION
Environment: Soil pollution, Water pollution		Nigeria
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
GOALS SET & PROGRESS ACHIEVED	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Measures initiated

Exelon Corporation		ISIN US30161N1019
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q4 2022
THEMES Corruption: Bribery		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE NA	REMEDIAL ACTION Measures initiated


FAST RETAILING CO., LTD.		ISIN JP3802300008
	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
THEMES Labour rights: Forced labour		LOCATION China
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Commitment expressed


Glencore Plc		ISIN JE00B4T3BW64
<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; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials</p> <p>SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage</p> <p>SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes,</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</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms, 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels</p> <p>SDG 17: Partnerships for the Goals; 17.1: Strengthen domestic resource mobilization</p>		<p>QUARTER</p> <p>Q4 2022</p>
<p>THEMES</p> <p>Environment: Pollution, Waste management, Water pollution</p>		<p>LOCATION</p> <p>Peru</p>
<p>GOALS SET & PROGRESS ACHIEVED</p>	<p>DISCLOSURE</p> <p>Commitment Expressed</p>	<p>IMPLEMENTATION OF POLICIES</p> <p>No measures announced</p>
	<p>TERMINATION OF PRACTICE</p> <p>Commitment Expressed</p>	<p>REMEDIAL ACTION</p> <p>Measures initiated</p>
<p>THEMES</p> <p>Environment: Air pollution, Pollution, Water pollution</p>		<p>LOCATION</p> <p>Colombia</p>
<p>GOALS SET & PROGRESS ACHIEVED</p>	<p>DISCLOSURE</p> <p>Measures initiated</p>	<p>IMPLEMENTATION OF POLICIES</p> <p>Measures initiated</p>
	<p>TERMINATION OF PRACTICE</p> <p>Commitment Expressed</p>	<p>REMEDIAL ACTION</p> <p>Measures initiated</p>
<p>THEMES</p> <p>Human rights: Indigenous rights, Stakeholder consultation</p>		<p>LOCATION</p> <p>Colombia</p>
<p>GOALS SET & PROGRESS ACHIEVED</p>	<p>DISCLOSURE</p> <p>Commitment expressed</p>	<p>IMPLEMENTATION OF POLICIES</p> <p>Commitment expressed</p>
	<p>TERMINATION OF PRACTICE</p> <p>Commitment expressed</p>	<p>REMEDIAL ACTION</p> <p>Commitment expressed</p>
<p>THEMES</p> <p>Human rights: Tax irregularities</p>		<p>LOCATION</p> <p>Australia</p>
<p>GOALS SET & PROGRESS ACHIEVED</p>	<p>DISCLOSURE</p> <p>Measures initiated</p>	<p>IMPLEMENTATION OF POLICIES</p> <p>Commitment expressed</p>
	<p>TERMINATION OF PRACTICE</p>	<p>REMEDIAL ACTION</p>



	Commitment expressed	Commitment expressed
THEMES		LOCATION
	Corruption: Bribery	Nigeria
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Commitment expressed	Measures initiated
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	NA	Measures initiated


Hankook & Company Co., Ltd.		ISIN KR7000240002
	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
THEMES		LOCATION
	Labour rights: Workplace health and safety	South Korea
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Commitment expressed


HANKOOK TIRE & TECHNOLOGY Co., Ltd.		ISIN KR7161390000
	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
THEMES		LOCATION
	Labour rights: Workplace health and safety	South Korea
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Commitment expressed

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
THEMES Corruption: Bribery		LOCATION Indonesia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE NA	REMEDIAL ACTION Commitment expressed


Imperial Oil Limited		ISIN CA4530384086
	SDG ALIGNMENT 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 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials	QUARTER Q4 2022
THEMES Environment: Air pollution, Biodiversity, Environmental impacts, Pollution, Water pollution		LOCATION Canada
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated


JBS SA		ISIN BRJBSACNOR8
	<p>SDG ALIGNMENT</p> <p>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</p>	<p>QUARTER</p> <p>Q3 2022</p>
THEMES Labour rights: Workplace health and safety		LOCATION Brazil
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated
THEMES Labour rights: Workplace health and safety		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated
Kobe Steel, Ltd.		ISIN JP3289800009
	<p>SDG ALIGNMENT</p> <p>SDG 13: Climate Action; 13.3: Improve education, awareness-raising and human and institutional capacity on climate change</p>	<p>QUARTER</p> <p>Q4 2022</p>
THEMES Environment: Air pollution, Climate change impacts		LOCATION Japan
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed


Kohls Corporation		ISIN US5002551043
	<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>	<p>QUARTER</p> <p>Q2 2022</p>
THEMES Labour rights: Forced labour		LOCATION China
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION No measures announced


Korian SE		ISIN FR0010386334
	<p>SDG ALIGNMENT</p> <p>SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages</p>	<p>QUARTER</p> <p>Q2 2022</p>
THEMES Human rights: Consumer health and safety		LOCATION France
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated


LG Chem Ltd.		ISIN KR7051910008
	SDG ALIGNMENT SDG 3: Good Health and Wellbeing; 3.9: Reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination, SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages	QUARTER Q4 2022
THEMES Human rights: Right to health, Right to life		LOCATION India
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated


LG Electronics, Inc.		ISIN KR7066570003
	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 Q4 2022
THEMES Labour rights: Forced labour		LOCATION China
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION NA


Loomis AB		ISIN SE0014504817
	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 Q4 2022
THEMES Labour rights: Union rights		LOCATION Turkey
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed

Macy's, Inc.		ISIN US55616P1049
	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
THEMES Labour rights: Forced labour		LOCATION China
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Commitment expressed


Paramount Global		ISIN US92556H2067
	SDG ALIGNMENT SDG 10: Reduced Inequalities; 10.3: Equal opportunities of outcome, SDG 5: Gender Equality; 5.1: End all forms of discrimination against all women and girls, SDG 5: Gender Equality; 5.2: Eliminate all forms of violence against all women and girls, SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q4 2022
THEMES Labour rights: Workplace discrimination		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated


Renault SA		ISIN FR0000131906
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q4 2022
THEMES Environment: Air pollution		LOCATION France
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Commitment expressed

Repsol SA		ISIN ES0173516115
	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 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world’s cultural and natural heritage SDG 14: Life Below Water; 14.2: Sustainably manage and protect marine and coastal ecosystems SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q4 2022
THEMES Human rights: Access to water / Indigenous rights		LOCATION Peru
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated
THEMES Environment: Biodiversity, Water pollution		LOCATION Peru
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated


Samsung Electronics Co., Ltd.		ISIN KR7005930003
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q4 2022
THEMES Corruption: Bribery		LOCATION South Korea
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE NA	REMEDIAL ACTION NA
THEMES Labour rights: Union rights		LOCATION South Korea
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Credible measures adopted
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Credible measures adopted

SK Inc.		ISIN KR7034730002
	SDG ALIGNMENT SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services, SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels, SDG 2: Zero Hunger; 2.1: End hunger and ensure access by all people to safe, nutritious and sufficient food	QUARTER Q4 2022
THEMES Human rights: Indigenous rights, Living standards, Right to life, Stakeholder consultation		LOCATION Laos
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION No measures announced

Sony Group Corp.		ISIN JP3435000009
	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 Q4 2022
THEMES Labour rights: Forced labour		LOCATION China
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Commitment expressed


Starbucks Corporation		ISIN US8552441094
	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
THEMES Labour rights: Union rights		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced


The AES Corporation		ISIN US00130H1059
	SDG ALIGNMENT SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services, SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels, SDG 6: Clean Water and Sanitation; 6.1: Universal and equitable access to safe and affordable drinking water	QUARTER Q2 2022
THEMES Human rights: Access to water / sanitation, Living standards, Stakeholder consultation		LOCATION Chile
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed

The GEO Group, Inc.		ISIN US36162J1060
	SDG ALIGNMENT SDG 10: Reduced Inequalities; 10.7: Facilitate orderly, safe, regular and responsible migration, SDG 16: Peace, justice and Strong Institutions; 16.1: Reduce all forms of violence and related death rates everywhere 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
	THEMES Human rights: Human rights due diligence	LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated
THEMES Labour rights: Forced labour		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced

Uber Technologies, Inc.		ISIN US90353T1007
	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, SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q3 2021
THEMES Labour rights: Living wage, Working conditions,		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Commitment expressed
THEMES Labour rights: Working conditions		LOCATION United Kingdom
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Commitment expressed

Verizon Communications Inc.		ISIN US92343V1044
	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 Q4 2022
THEMES Labour rights: Union rights		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Credible measures adopted

Volkswagen AG		ISIN DE0007664039
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q4 2022
THEMES Environment: Air pollution, Pollution		LOCATION Germany
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

Woodside Energy Group Ltd.		ISIN AU0000224040
	SDG ALIGNMENT SDG 13: Climate Action; 13.3: Improve education, awareness-raising and human and institutional capacity on climate change	QUARTER Q4 2022
THEMES Environment: Biodiversity, Climate change impacts, Environmental impacts		LOCATION Australia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed

RESPONSIVENESS TO Q4 2022 ENGAGEMENT LETTERS

The following table provides an overview of the responsiveness to the engagement initiated in Q4 as of 31 December 2022. Companies that had yet to respond to the initial engagement letters were sent reminder notifications on 9 December 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
Accenture Plc	IE00B4BNMY34	Labour rights	Yes
Barclays PLC	GB0031348658	Human rights	Yes
Carnival Corporation	PA1436583006	Environment	Yes
Carnival Plc	GB0031215220	Environment	Yes
Coca-Cola Europacific Partners Plc	GB00BDCPN049	Labour rights	Yes
Exelon Corporation	US30161N1019	Corruption	Yes
Exxon Mobil Corporation	US30231G1022	Overlapping (Environment, Human rights)	Yes
Formosa Petrochemical Corp.	TW0006505001	Environment	No
Glencore Plc	JE00B4T3BW64	Overlapping (Corruption, Environment, Human rights)	Yes
Imperial Oil Limited	CA4530384086	Environment	Yes
Kobe Steel, Ltd.	JP3289800009	Environment	Yes
LG Chem Ltd.	KR7051910008	Human rights	Yes
Loomis AB	SE0014504817	Labour rights	Yes
Paramount Global	US92556H2067	Labour rights	Yes
PG&E Corporation	US69331C1080	Human rights	No
Porsche Automobil Holding SE	DE000PAH0038	Environment	No
Renault SA	FR0000131906	Environment	Yes
Repsol SA	ES0173516115	Overlapping (Environment, Human rights)	Yes
Samsung Electronics Co., Ltd.	KR7005930003	Overlapping (Corruption, Labour rights)	Yes
Sony Group Corp.	JP3435000009	Labour rights	Yes
The Coca-Cola Company	US1912161007	Labour rights	No

Tyson Foods, Inc.	US9024941034	Labour rights	No
Verizon Communications Inc.	US92343V1044	Labour rights	Yes
Volcan Compania Minera S.A.A.	PEP648014202	Environment	No
Volkswagen AG	DE0007664039	Environment	Yes
Woodside Energy Group Ltd.	AU0000224040	Environment	Yes

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