



ISS ESG



**NORM-BASED
ENGAGEMENT**

2022 Annual Report

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INTRODUCTION

This report presents the Norm-Based Engagement activities that were carried out by ISS ESG on behalf of participating institutional investors during 2022.

The first section of the report provides an overview of the ISS ESG Norm-Based Engagement approach. This is followed by sections presenting overall engagement statistics for 2022, key engagement themes, as well as engagement outcomes including selected engagement spotlights. The report also a section covering details of dialogues held, unresponsive companies, as well as engagements that were closed in 2022. The final section of the report highlights companies unresponsive to long-standing controversies.

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 facilitates engagement with issuers on behalf of participating 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. By engaging collaboratively, participating asset owners and managers can wield more influence than through solo engagements, while saving time and resources.

ENGAGEMENT SCOPE

Through ISS ESG's Norm-Based Engagement, participating 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. The engagements are categorised under the four United Nations Global Compact areas of human rights, labour rights, environment, and anti-corruption. Each engagement is identified by one or several specific topics within these areas, e.g., union rights, workplace discrimination, health and safety, child labour and forced labour within the labour rights norm area.

ENGAGEMENT PROCESS

The engagement is preceded by in-depth research and fact-finding dialogues with companies and stakeholders through ISS ESG Norm-Based Research. Once a company is identified to be involved in a relevant controversy it is considered for Norm-Based Engagement, which is conducted on a rolling quarterly basis. Through these feasibility studies, ISS ESG identifies gaps in company disclosure and assesses whether investor dialogue is an appropriate means to reach the goals set by the participating investors. Influential factors include an estimation of the company's level of responsibility, mitigating 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.

The engagement dialogue is initiated through letters to companies, sent by ISS ESG on behalf of participating investors. Dialogue may be conducted in writing or through calls and meetings, facilitated by ISS ESG. Some companies require repeated follow-ups to respond. Should the company remain unresponsive, enquiries are escalated to the CEO and the Board. Once every effort has been made to engage both Investor Relations and a company's Executive Management, the feasibility of engagement is re-evaluated.

ENGAGEMENT OUTCOMES

At the outset of each engagement, clear and actionable goals are defined within four key categories: disclosure, implementation, remediation and termination. Information provided by the company through the course of the engagement dialogue is assessed against the goals. ISS ESG also assesses the company's quality of participation in the engagement. Where the goals have been fulfilled and the controversy – or the risk thereof – is assessed to have been resolved, the engagement is closed. If there is insufficient information to determine whether the goals have been fulfilled, the engagement may be suspended pending developments in the controversy or the disclosure of further information by the company, and may subsequently be extended. Alternatively, where there is a poor outlook for the achievement of goals for the engagement, the dialogue may be discontinued.

ENGAGEMENT STATISTICS

During 2022 ISS ESG conducted Norm-Based Engagement on behalf of participating investors with 149 companies, covering 199 individual ESG topics. The companies engaged with are domiciled across 34 different locations. For 110 of the companies, a new engagement cycle was initiated during 2022. Some 70% of the 149 companies provided responses to the investor outreach.

Charts 1-4: Summary charts of engagements conducted between 1 January 2021 and 31 December 2022

Chart 1

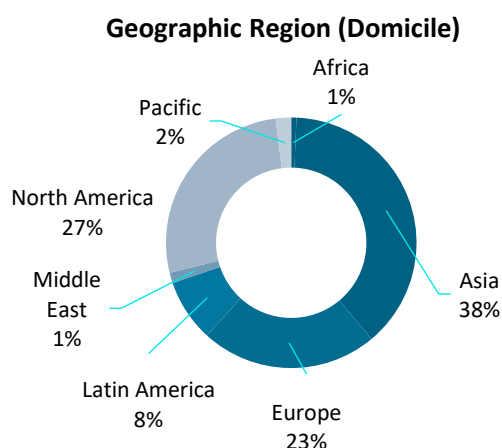


Chart 2

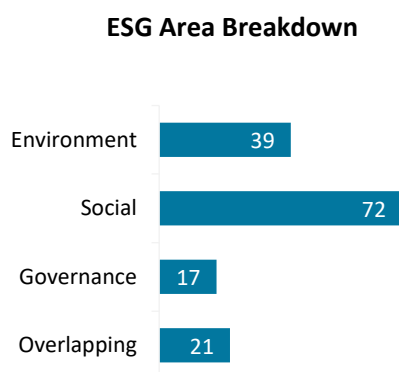


Chart 3

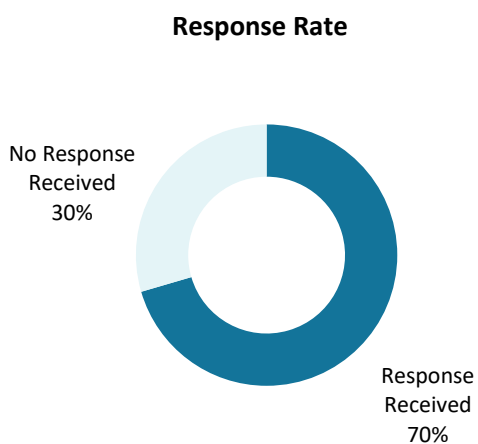
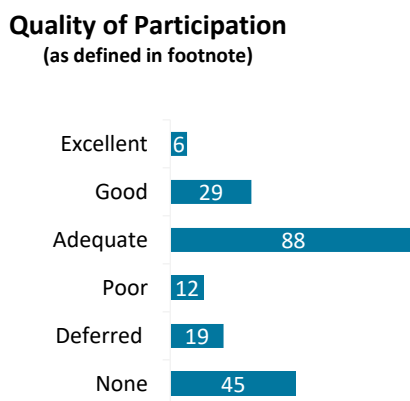


Chart 4



1

¹ **NOTE:** Quality of participation definitions: **Excellent:** The company has replied and substantially addressed all elements of the questions. **Good:** The company has replied and addressed most elements of the questions. **Adequate:** The company has replied, but only partially addressed the questions posed. **Poor:** The company has replied but did not address the questions posed. **Deferred:** The company has replied, acknowledging the enquiry, but has requested more time to respond and/or transferred the responsibility to another function in the company. **None:** The company has not replied.

ENGAGEMENT THEMES

This section outlines the key themes that Norm-Based Engagement related to during 2022. In the area of human rights, the key engagement topics were human rights due diligence and concerns regarding indigenous rights, especially related to stakeholder consultation. Workplace health and safety was the dominant labour rights theme, followed by union rights and forced labour/modern slavery. The majority of environment-focused engagement topics were related to corporate management of incidents of pollution (air, water, and soil), loss of biodiversity, and climate change. Within the area of anti-corruption, key engagement themes included bribery and anti-competitive behaviour.

The following table provides an overview of major engagement themes in 2022.

Table 1: Major engagement themes in 2022 (individual engagements may cover multiple themes)

UN GLOBAL COMPACT PRINCIPLES	NORM AREA	TOPIC AREA
1-2	 Human Rights	Human rights due diligence
		Indigenous rights / Stakeholder consultation
3-6	 Labour Rights	Workplace health and safety
		Union rights
7-9	 Environment	Pollution (Air, Water, and Soil)
		Environmental impacts
10	 Anti-Corruption	Bribery
		Anti-competitive behaviour

ENGAGEMENT OUTCOMES

One of the key outcomes of Norm-Based Engagement activity during 2022 is that participating investors elicited greater transparency from companies, marking a new record response rate of 70%. In most cases, improvements in disclosure and openness to dialogue were achieved gradually after persistent reminders and follow-up. Engagement success was achieved with companies which increased transparency, stopped a controversial practice, or announced a concrete and time-bound strategy for risk mitigation.

SELECTED ENGAGEMENT SPOTLIGHTS

The selected engagement spotlights below illustrate both successes and remaining work to be done in some of the major 2022 engagement themes, including human rights due diligence, forced labour and working conditions.

CoreCivic, Inc.		ISIN US21871N1019
THEME Human rights due diligence, Forced labour	LOCATION United States	
ACTIVITY SUMMARY	<p>In Q3 2022, ISS ESG shared a letter with CoreCivic, Inc. on behalf of participating investors regarding the company's alleged failure to respect the right not to be subjected to inhumane and/or degrading treatment, and alleged failure to prevent forced labour, at correctional and detention centres in the United States.</p> <p>In an engagement meeting facilitated by ISS ESG in October 2022, the company shared detailed information regarding its actions to stop the spread of COVID-19 at its facilities. Concerning measures to ensure that detainees are not subjected to inhumane and/or degrading treatment, the company highlighted its multi-level grievance process and mechanisms, available to all detainees and CoreCivic staff, the various authorities which conduct investigations into any allegations of human rights abuse, and the company's quality assurance audits which are based on 1,500 human rights indicators. ISS ESG notes the company's process to review grievances related to sexual assault allegations, and how it routinely tracks grievances to identify trends and interviews and surveys inmate populations for feedback on key areas. ISS ESG would have appreciated further disclosure on recent human rights issues identified through the grievance channels and through audits conducted at the facility.</p> <p>Concerning the forced labour allegations, CoreCivic stated that it is limited in its ability to commission an independent investigation and share results publicly given that there is ongoing litigation. However, the company noted that it hired outside counsel to review and investigate the allegations and that its internal quality assurance team and ICE conduct frequent audits to evaluate if coerced labour is present in the company's facilities. ISS ESG notes CoreCivic's commitments in relation to human and labour rights at its facilities, such as updating and developing new policies and procedures. ISS ESG would have appreciated further</p>	

disclosure on the specific measures adopted by the company to address the allegations concerning conditions indicative of forced labour within its operations.

ISS ESG notes the details CoreCivic provided in this engagement dialogue, based on which the company was assessed to have made positive progress in the engagement goals with regard to implementation of relevant policies (Human Rights and Labour Rights controversy) as well as the disclosure of relevant information and remedial action (Labour Rights controversy). ISS ESG continues to monitor the efficacy of the company’s commitments and remediation efforts to address the allegations.

SIPEF SA/NV

ISIN
BE0003898187

THEME
Working conditions

LOCATION
Indonesia

ACTIVITY
SUMMARY

In Q3 2021, ISS ESG shared a letter with **SIPEF SA/NV** on behalf of participating investors regarding the company's alleged failure to respect the right to just and favourable conditions of work in Indonesia.

In an engagement meeting facilitated by ISS ESG in February 2022, the company shared detailed information regarding its actions to address allegations of poor labour standards at its palm oil plantations in Indonesia. The company presented several remediation measures undertaken at the operations of its 95%-owned subsidiary PT Agro Kati Lama, such as through engagement with stakeholders – including the Roundtable on Responsible Palm Oil’s (RSPO) Dispute Settlement Facility – and an independent third-party assessment into the allegations and of the company’s policy commitments. Furthermore, the company elaborated on its labour rights policies regarding the health and safety, employment status, and pay in line with national policies.

ISS ESG notes the details SIPEF provided in this engagement dialogue, based on which the company was assessed to have made positive progress for all engagement goals, in particular with regard to remedial action. In August 2022, the underlying Norm-Based Research assessment was upgraded because in June 2022 a complaint raised through the RSPO was resolved and no new allegations have emerged against the company. ISS ESG holds this engagement to be an example of positive dialogue in which the company has demonstrated an openness and responsiveness to engagement and demonstrated that it has taken credible measures to address the allegations.

Carrefour SA		ISIN FR0000120172
THEME Forced labour	LOCATION China	
ACTIVITY SUMMARY	<p>In Q2 2022, ISS ESG shared a letter with Carrefour SA on behalf of participating investors regarding the company's alleged failure (fragmentary information) to prevent forced labour in the supply chain in China.</p> <p>In an engagement meeting facilitated by ISS ESG in September 2022, the company shared detailed information to address the allegations of forced labour in its supply chain. While Carrefour stated that it continues to source from allegedly controversial suppliers, it presented remediation measures that it is implementing in order to ensure there are no forced labour practices in its supply chain, such as through external investigation tools to identify non-compliance among its suppliers. Carrefour shared an example of its due diligence projects in spinning mills in its supply chain in India, where the company implemented a 'Worker Voice' system in 2020 to receive employee feedback on working conditions. Moreover, the company shared information regarding its evaluation of textile suppliers, including commercial, quality and delivery (supply chain) ratings. The company also initiated a mapping of its tier 2 suppliers in 2020 and aims to use all traceable and sustainable natural materials by 2030. Furthermore, Carrefour stated that it considers audits and self-assessments to be outdated processes, which are not sufficient and instead highlighted the importance of investigations. The company also collaborates with the NGO International Federation for Human Rights to prevent human rights abuses in its supply chain.</p> <p>ISS ESG notes the details Carrefour provided in this engagement dialogue, based on which the company was assessed to have made positive progress in the engagement goals, in particular with regard to disclosure of relevant information. ISS ESG continues to monitor the efficacy of the company's commitments to address the allegations.</p>	

ENGAGEMENT DETAILS

The following section provides information on all Norm-Based Engagement activities conducted during 2022. The section provides an overview of the dialogues held with responsive companies during the year, a list of companies which have remained unresponsive as of 31 December 2022, as well as the engagement topics which have been closed during the year. The tables present the status achieved for each of the engagement goals which were set when the engagement dialogue was initiated.

For the responsive companies, an overview of the progress towards the engagement goals is included in the tables. ISS ESG uses the following category of goals and statuses to measure progress and success of the engagement:

Engagement Goals	Disclosure of Relevant Information	Engagement Goal Status	Credible Measures Adopted
	Termination of Problematic Practices		Measures Initiated
	Implementation of Relevant Policies		Commitment Expressed
	Remedial Action		No Measures Announced

ENGAGEMENT DIALOGUES

This section lists all engagements in which a dialogue was established with the company, either via email or in a conference call, during 2022. These engagements were initiated through an engagement enquiry sent by ISS ESG on behalf of participating investors in 2022 or a previous year. In total, responses were received from 105 companies during 2022.

The list below provides an overview of the companies that responded in 2022. The subsequent tables provide a synopsis of the engagement with each of these companies: the quarter and year of the initial engagement enquiry, SDG alignment, engagement topic and controversy location, and progress towards the engagement goals.

Responses related to engagements initiated in 2022

Accenture Plc	Imperial Oil Limited
Adani Ports & Special Economic Zone Ltd.	JBS SA
Aegea Saneamento e Participacoes SA	Kobe Steel, Ltd.
AES Andes SA	Kohls Corporation
Amazon.com, Inc.	Korea Shipbuilding & Offshore Engineering Co., Ltd.
Anheuser-Busch InBev SA/NV	Korian SE
AntarChile SA	KT Corp.
Barclays PLC	Lands' End, Inc.
Barrick Gold Corporation	Levi Strauss & Co.
Bayer AG	LG Chem Ltd.
Beowulf Mining Plc	LG Electronics, Inc.
Bharat Heavy Electricals Limited	Loomis AB
Carnival Corporation	Lyft, Inc.
Carnival Plc	Macy's, Inc.
Carrefour SA	Meituan
CMOC Group Ltd.	Paramount Global
CNOOC Limited	Petroleos Del Peru - Petroperu SA
Coca-Cola Europacific Partners Plc	PT Pertamina (Persero)
CoreCivic, Inc.	PT Sampoerna Agro Tbk
Delta Air Lines, Inc.	PVH Corp.
Eni SpA	Renault SA
Exelon Corporation	Repsol SA
Exxon Mobil Corporation	Rio Tinto Limited
FAST RETAILING CO., LTD.	Rio Tinto Plc
FGV Holdings Bhd.	Samsung Electronics Co., Ltd.
Freeport-McMoRan, Inc.	Shell Plc
Glencore Plc	Sibanye Stillwater Ltd.
Hankook & Company Co., Ltd.	Sony Group Corp.
HANKOOK TIRE & TECHNOLOGY Co., Ltd.	Starbucks Corporation
HD HYUNDAI Co., Ltd.	Stellantis NV
HUGO BOSS AG	STRABAG SE
HYUNDAI ENGINEERING & CONSTRUCTION CO., LTD.	Sumitomo Chemical Co., Ltd.
Hyundai Heavy Industries Co., Ltd.	Sumitomo Corp.

Suncor Energy Inc.
Target Corporation
Texhong Textile Group Limited
The AES Corporation
The Brinks Company
The GEO Group, Inc.
Tokyo Electric Power Co. Holdings, Inc.

Top Glove Corp. Bhd.
TotalEnergies SE
Urban Outfitters, Inc.
Verizon Communications Inc.
Volkswagen AG
Walmart Inc.
Woodside Energy Group Ltd.

Responses related to engagements initiated in 2021

Airbus SE
Alphabet Inc.
ArcelorMittal SA
Aziyo Biologics, Inc.
BHP Group Limited
Companhia de Saneamento do Parana
Companhia Energetica de Minas Gerais SA
Elsewedy Electric Co.
JinkoSolar Holding Co., Ltd.
Meta Platforms, Inc.
SK Inc.
Telefonaktiebolaget LM Ericsson
TENMA Corp.
Transneft PJSC
Uber Technologies, Inc.
VEON Ltd

Accenture Plc		ISIN IE00B4BNMY34
SDG ALIGNMENT		QUARTER
	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	Q4 2022
THEMES Working conditions, Workplace health and safety		LOCATION United States
ENGAGEMENT GOAL STATUS	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION No measures announced

Adani Ports & Special Economic Zone Ltd.		ISIN INE742F01042
SDG ALIGNMENT		QUARTER
	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	Q2 2022
THEMES Indigenous rights, Stakeholder consultation		LOCATION Australia
ENGAGEMENT GOAL STATUS	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		QUARTER
	SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	Q1 2022
THEMES Bribery		LOCATION Brazil
ENGAGEMENT GOAL STATUS	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated

AES Andes SA		ISIN CL0002694637
SDG ALIGNMENT		QUARTER
	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	Q2 2022
THEMES Access to water / sanitation, Living standards, Stakeholder consultation		LOCATION Chile
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed

Airbus SE		ISIN NL0000235190
SDG ALIGNMENT		QUARTER
	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	Q3 2021
THEMES Union rights		LOCATION United States
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated
THEMES Bribery		LOCATION China
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES N/A
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A
THEMES Bribery		LOCATION Ghana
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES N/A
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A
THEMES Bribery		LOCATION Nepal
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES N/A
	TERMINATION OF PRACTICE	REMEDIAL ACTION

	N/A	N/A
THEMES		LOCATION
Bribery		United Arab Emirates
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	N/A
TERMINATION OF PRACTICE		REMEDIAL ACTION
	N/A	N/A
THEMES		LOCATION
Bribery		Sri Lanka
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	N/A
TERMINATION OF PRACTICE		REMEDIAL ACTION
	N/A	N/A
THEMES		LOCATION
Bribery		Taiwan
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	N/A
TERMINATION OF PRACTICE		REMEDIAL ACTION
	N/A	N/A
THEMES		LOCATION
Bribery		Malaysia
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	N/A
TERMINATION OF PRACTICE		REMEDIAL ACTION
	N/A	N/A
THEMES		LOCATION
Bribery		Kuwait
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	N/A
TERMINATION OF PRACTICE		REMEDIAL ACTION
	N/A	N/A


Alphabet Inc.		ISIN
		US02079K3059
SDG ALIGNMENT		QUARTER
	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	Q3 2021
THEMES		LOCATION
Working conditions, Workplace health and safety		United States
	DISCLOSURE	IMPLEMENTATION OF POLICIES


ENGAGEMENT GOAL STATUS	Commitment expressed	Commitment expressed
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Commitment expressed
THEMES		LOCATION
Anti-competitive behaviour		Several countries
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	No measures announced	No measures announced
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Measures initiated
THEMES		LOCATION
Consumer privacy, Consumer rights		France
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Measures initiated


Amazon.com, Inc.		ISIN
		US0231351067
SDG ALIGNMENT		QUARTER
	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	Q3 2022
	SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	
THEMES		LOCATION
Union rights, Working conditions, Workplace health and safety		Germany
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Commitment expressed	Commitment expressed
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	No measures announced
THEMES		LOCATION
Union rights		United States
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Commitment expressed	Commitment expressed
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	No measures announced
THEMES		LOCATION
Union rights, Working conditions, Workplace health and safety		United Kingdom
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	No measures announced	Commitment expressed
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	No measures announced
THEMES		LOCATION


Union rights, Working conditions, Workplace health and safety		Italy
ENGAGEMENT GOAL STATUS	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION No measures announced
THEMES Union rights, Working conditions, Workplace health and safety		LOCATION Spain
ENGAGEMENT GOAL STATUS	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed
THEMES Anti-competitive behaviour		LOCATION Italy
ENGAGEMENT GOAL STATUS	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced

Anheuser-Busch InBev SA/NV		ISIN BE0974293251
SDG ALIGNMENT		QUARTER
	SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	Q3 2022
THEMES Union rights		LOCATION Peru
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated

AntarChile SA		ISIN CLP0362E1386
SDG ALIGNMENT		QUARTER
	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	Q3 2022
THEMES Indigenous rights, Stakeholder consultation, Water pollution		LOCATION Chile
ENGAGEMENT GOAL STATUS	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Commitment expressed

ArcelorMittal SA		ISIN LU1598757687
SDG ALIGNMENT		QUARTER
	SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	Q1 2021
THEMES Air pollution, Pollution, Waste management, Water pollution		LOCATION Kazakhstan
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated
THEMES Air pollution, Pollution, Water pollution		LOCATION France
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated

Aziyo Biologics, Inc.		ISIN US05479K1060
SDG ALIGNMENT		QUARTER
	SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages	Q4 2021
THEMES Consumer health and safety, Consumer rights, Right to life		LOCATION United States
ENGAGEMENT GOAL STATUS	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES N/A
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated


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


No measures announced	No measures announced
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Barrick Gold Corporation		ISIN CA0679011084
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.1: Reduce all forms of violence and related death rates everywhere SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, 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 Q3 2022
	THEMES Access to water / sanitation, Forced displacement, Human rights due diligence, Living standards, Right to life	LOCATION Papua New Guinea
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated
THEMES Human rights due diligence, Right to life, Torture / inhumane treatment		LOCATION Tanzania
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated
THEMES Right to health, Water pollution		LOCATION Papua New Guinea
ENGAGEMENT GOAL STATUS	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced
THEMES Environmental impacts, Pollution, Waste management, Water pollution		LOCATION Argentina
ENGAGEMENT GOAL STATUS	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	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 Biodiversity, Environmental impacts	LOCATION Several countries
DISCLOSURE		IMPLEMENTATION OF POLICIES

ENGAGEMENT GOAL STATUS	Measures initiated	Measures initiated
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Measures initiated

Beowulf Mining Plc		ISIN GB0033163287
	SDG ALIGNMENT	QUARTER
	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	Q3 2022
THEMES Indigenous rights, Stakeholder consultation		LOCATION Sweden
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	No measures announced	Commitment expressed
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	No measures announced	Commitment expressed

Bharat Heavy Electricals Limited		ISIN INE257A01026
	SDG ALIGNMENT	QUARTER
	SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage, SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning, 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	Q1 2022
THEMES Air pollution, Biodiversity, Climate change impacts, Environmental impacts, Pollution, Water pollution		LOCATION Bangladesh
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Commitment expressed
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	No measures announced	Measures initiated

BHP Group Limited		ISIN AU000000BHP4
	SDG ALIGNMENT	QUARTER
		Q1 2021

SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, 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 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

THEMES		LOCATION
Environmental impacts, Pollution, Soil pollution, Waste management, Water pollution		Brazil
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Credible measures adopted	Credible measures adopted
	Measures initiated	Measures initiated

THEMES		LOCATION
Biodiversity, Environmental impacts		Chile
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Credible measures adopted	Credible measures adopted
	Measures initiated	Measures initiated

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		LOCATION
Water pollution		United States
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Measures initiated
	Measures initiated	Measures initiated

Carnival Plc ISIN
GB0031215220

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		LOCATION
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Water pollution		United States
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Measures initiated
	Measures initiated	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		LOCATION
Forced labour, Human rights due diligence, Modern slavery, Religious affiliation discrimination (social), Social discrimination		China
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Commitment expressed
	No measures announced	Commitment expressed


CMOC Group Ltd.		ISIN
		CNE100000114
SDG ALIGNMENT		QUARTER
	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	Q2 2022
THEMES		LOCATION
Living wage, Union rights, Working conditions, Workplace health and safety		Congo (Democratic Republic)
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	No measures announced	No measures announced
	No measures announced	No measures announced

CNOOC Limited		ISIN
		HK0883013259
SDG ALIGNMENT		QUARTER
		Q2 2022

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		
THEMES		LOCATION
Air pollution, Biodiversity, Environmental impacts, Pollution, Water pollution		Canada
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	No measures announced	No measures announced
	No measures announced	No measures announced

Coca-Cola Europacific Partners Plc		ISIN
		GB00BDCPN049
SDG ALIGNMENT		QUARTER
	SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	Q4 2022
THEMES		LOCATION
Union rights		Indonesia
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Measures initiated
	Commitment expressed	Measures initiated

Companhia de Saneamento do Parana		ISIN
		BRSAPRACNPR6
SDG ALIGNMENT		QUARTER
	SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials	Q3 2021
THEMES		LOCATION
Waste management, Water pollution		Brazil
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Measures initiated
	Measures initiated	Measures initiated

Companhia Energetica de Minas Gerais SA		ISIN
		BRCMIGACNPR3
SDG ALIGNMENT		QUARTER
		Q2 2021

<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, SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species</p> <p>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</p>		
THEMES		LOCATION
Biodiversity, Environmental impacts		Brazil
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Commitment expressed
	Measures initiated	Measures initiated
THEMES		LOCATION
Forced displacement, Indigenous rights, Living standards, Right to health, Stakeholder consultation		Brazil
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Commitment expressed
	Measures initiated	Measures initiated

CoreCivic, Inc.		ISIN
		US21871N1019
	SDG ALIGNMENT	QUARTER
	<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>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>	Q3 2022
THEMES		LOCATION
Human rights due diligence, Torture / inhumane treatment		United States
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Measures initiated
	Commitment expressed	Measures initiated
THEMES		LOCATION
Forced labour, Living wage, Modern slavery, Working conditions, Workplace health and safety		United States
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Commitment expressed
	No measures announced	Commitment expressed

Delta Air Lines, Inc.		ISIN US2473617023
SDG ALIGNMENT		QUARTER
	SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	Q1 2022
THEMES Union rights		LOCATION United States
ENGAGEMENT GOAL STATUS	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed


Elsewedy Electric Co.		ISIN EGS3G0Z1C014
SDG ALIGNMENT		QUARTER
	SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world’s cultural and natural heritage, SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species	Q2 2021
THEMES Biodiversity, Deforestation, Environmental impacts		LOCATION Tanzania
ENGAGEMENT GOAL STATUS	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced


Eni SpA		ISIN IT0003132476
SDG ALIGNMENT		QUARTER
	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	Q3 2022
THEMES Oil spill, Pollution, Soil pollution, Water pollution		LOCATION Nigeria
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated

Exelon Corporation		ISIN US30161N1019
SDG ALIGNMENT		QUARTER
	SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	Q4 2022
THEMES Bribery		LOCATION United States
ENGAGEMENT GOAL STATUS	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated

Exxon Mobil Corporation		ISIN US30231G1022
SDG ALIGNMENT		QUARTER
	SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning, 13.3: Improve education, awareness-raising and human and institutional capacity on climate change 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 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	Q4 2022
THEMES Climate change regulation		LOCATION United States
ENGAGEMENT GOAL STATUS	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced
THEMES Air pollution, Biodiversity, Environmental impacts, Pollution, Water pollution		LOCATION Canada
ENGAGEMENT GOAL STATUS	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced
THEMES Climate change impacts		LOCATION Australia
DISCLOSURE		IMPLEMENTATION OF POLICIES

ENGAGEMENT GOAL STATUS	No measures announced	No measures announced
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	No measures announced	No measures announced
THEMES		LOCATION
Access to water / sanitation, Indigenous rights		United States
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	No measures announced	No measures announced
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	No measures announced	No measures announced

FAST RETAILING CO., LTD.		ISIN
		JP3802300008
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		LOCATION
Forced labour, Human rights due diligence, Modern slavery, Religious affiliation discrimination (social), Social discrimination		China
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	No measures announced	Commitment expressed

FGV Holdings Bhd.		ISIN
		MYL522200004
SDG ALIGNMENT		QUARTER
	SDG 15: Life on Land; 15.2: Sustainable management of all types of forests	Q1 2022
THEMES		LOCATION
Biodiversity, Climate change impacts, Deforestation		Indonesia
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Commitment expressed	Commitment expressed
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	N/A	Commitment expressed


Freeport-McMoRan, Inc.		ISIN
		US35671D8570
SDG ALIGNMENT		QUARTER
		Q1 2022

SDG 16: Peace, justice and Strong Institutions; 16.1: Reduce all forms of violence and related death rates everywhere SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials		
THEMES		LOCATION
Human rights due diligence, Indigenous rights, Right to life		Indonesia
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Measures initiated
	Measures initiated	Measures initiated
THEMES		LOCATION
Biodiversity, Water pollution		Indonesia
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Commitment expressed
	Commitment expressed	Measures initiated

Glencore Plc		ISIN
		JE00B4T3BW64
SDG ALIGNMENT		QUARTER
 	SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, 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 17: Partnerships for the Goals; 17.1: Strengthen domestic resource mobilization SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms 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 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services, 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	Q4 2022
	THEMES	
Pollution, Waste management, Water pollution		Peru
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	No measures announced
	Commitment expressed	Measures initiated
THEMES		LOCATION
Air pollution, Pollution, Water pollution		Colombia


ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Measures initiated
THEMES		LOCATION
Tax irregularities		Australia
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Commitment expressed
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Commitment expressed
THEMES		LOCATION
Access to water / sanitation, Forced displacement, Indigenous rights, Living standards, Right to health, Stakeholder consultation		Colombia
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Commitment expressed	Commitment expressed
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Commitment expressed
THEMES		LOCATION
Bribery		Nigeria
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Commitment expressed	Measures initiated
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	REMEDIAL ACTION
	N/A	Measures initiated

Hankook & Company Co., Ltd.		ISIN
		KR7000240002
SDG ALIGNMENT		QUARTER
	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	Q3 2022
THEMES		LOCATION
Industrial accident, Workplace health and safety		South Korea
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Commitment expressed

HANKOOK TIRE & TECHNOLOGY Co., Ltd.		ISIN
		KR7161390000
SDG ALIGNMENT		QUARTER
		Q3 2022

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		
THEMES Industrial accident, Workplace health and safety		LOCATION South Korea
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	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
THEMES Industrial accident, Workplace health and safety		LOCATION South Korea
ENGAGEMENT GOAL STATUS	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; 8.8: Protect labour rights and promote safe and secure working environments for all workers, 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 Union rights		LOCATION Turkey
ENGAGEMENT GOAL STATUS	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION No measures announced
THEMES Forced labour, Human rights due diligence, Modern slavery, Religious affiliation discrimination (social), Social discrimination		LOCATION China
ENGAGEMENT GOAL STATUS	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE	REMEDIAL ACTION


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

Hyundai Heavy Industries Co., Ltd.		ISIN KR7329180004
SDG ALIGNMENT		QUARTER
	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	Q3 2022
THEMES Industrial accident, Workplace health and safety		LOCATION South Korea
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated

Imperial Oil Limited		ISIN CA4530384086
SDG ALIGNMENT		QUARTER
	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	Q4 2022
THEMES Air pollution, Biodiversity, Environmental impacts, Pollution, Water pollution		LOCATION Canada
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated

JBS SA		ISIN
		BRJBSSACNOR8
	SDG ALIGNMENT	QUARTER
	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	Q3 2022
THEMES		LOCATION
Industrial accident, Workplace health and safety		Brazil
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Measures initiated
THEMES		LOCATION
Workplace health and safety		United States
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Measures initiated

JinkoSolar Holding Co., Ltd.		ISIN
		US47759T1007
	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	Q3 2021
THEMES		LOCATION
Forced labour, Human rights due diligence, Modern slavery, Religious affiliation discrimination (social), Social discrimination		China
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	No measures announced	No measures announced
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	REMEDIAL ACTION
	No measures announced	No measures announced

Kobe Steel, Ltd.		ISIN
		JP3289800009
	SDG ALIGNMENT	QUARTER
	SDG 13: Climate Action; 13.3: Improve education, awareness-raising and human and institutional capacity on climate change	Q4 2022
THEMES		LOCATION
Air pollution, Climate change impacts		Japan
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Commitment expressed	Commitment expressed
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Commitment expressed

Kohls Corporation		ISIN
		US5002551043
	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		LOCATION
Forced labour, Human rights due diligence, Modern slavery, Religious affiliation discrimination (social), Social discrimination		China
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	No measures announced	No measures announced
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	No measures announced

Korea Shipbuilding & Offshore Engineering Co., Ltd.		ISIN
		KR7009540006
	SDG ALIGNMENT	QUARTER
	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	Q3 2022
THEMES		LOCATION
Industrial accident, Workplace health and safety		South Korea
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Measures initiated

Korian SE		ISIN
		FR0010386334
	SDG ALIGNMENT	QUARTER
	SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages	Q2 2022
THEMES		LOCATION
Consumer health and safety, Consumer rights, Right to life		France
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Measures initiated

KT Corp.		ISIN
		KR7030200000
	SDG ALIGNMENT	QUARTER
		Q1 2022

SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms		
THEMES Bribery		LOCATION South Korea
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE NA	REMEDIAL ACTION Measures initiated

Lands' End, Inc.		ISIN US51509F1057
	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
THEMES Forced labour, Human rights due diligence, Modern slavery, Religious affiliation discrimination (social), Social discrimination		LOCATION China
ENGAGEMENT GOAL STATUS	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION N/A

Levi Strauss & Co.		ISIN US52736R1023
	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 Forced labour, Human rights due diligence, Modern slavery, Religious affiliation discrimination (social), Social discrimination		LOCATION China
ENGAGEMENT GOAL STATUS	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced

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		LOCATION
Right to health, Right to life		India
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Commitment expressed
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Measures initiated

LG Electronics, Inc.		ISIN
		KR7066570003
	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	Q3 2022
THEMES		LOCATION
Forced labour, Human rights due diligence, Modern slavery, Religious affiliation discrimination (social), Social discrimination		China
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	N/A

Loomis AB		ISIN
		SE0014504817
	SDG ALIGNMENT	QUARTER
	SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	Q4 2022
THEMES		LOCATION
Union rights, Working conditions, Workplace health and safety		Turkey
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Commitment expressed	Commitment expressed
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Commitment expressed

Lyft, Inc.		ISIN
		US55087P1049
	SDG ALIGNMENT	QUARTER
	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	Q1 2022
THEMES		LOCATION
Living wage, Working conditions		United States


ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Commitment expressed
	Commitment expressed	No measures announced


Macy's, Inc.		ISIN
		US55616P1049
	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		LOCATION
Forced labour, Human rights due diligence, Modern slavery, Religious affiliation discrimination (social), Social discrimination		China
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Measures initiated
	No measures announced	Commitment expressed

Meituan		ISIN
		KYG596691041
	SDG ALIGNMENT	QUARTER
	N/A	Q1 2022
THEMES		LOCATION
Anti-competitive behaviour		China
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	No measures announced	No measures announced
	N/A	No measures announced

Meta Platforms, Inc.		ISIN
		US30303M1027
	SDG ALIGNMENT	QUARTER
	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	Q3 2021
THEMES		LOCATION
Working conditions, Workplace health and safety		United States
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Measures initiated
	Commitment expressed	Commitment expressed

THEMES		LOCATION
Working conditions, Workplace health and safety		Ireland
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Commitment expressed	Commitment expressed
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	REMEDIAL ACTION
	No measures announced	No measures announced

Paramount Global		ISIN
		US92556H2067
	SDG ALIGNMENT	QUARTER
	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	Q4 2022
THEMES		LOCATION
Age discrimination (workplace), Gender discrimination (workplace), Racial discrimination (workplace), Sexual harassment (workplace), Workplace discrimination		United States
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Measures initiated

Petroleos Del Peru - Petroperu SA		ISIN
		PEP496001202
	SDG ALIGNMENT	QUARTER
	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	Q2 2022
THEMES		LOCATION
Oil spill, Pollution, Soil pollution, Water pollution		Peru
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Measures initiated

PT Pertamina (Persero)		ISIN
		US69369EAB56
	SDG ALIGNMENT	QUARTER
		Q2 2022

	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 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	
THEMES	Biodiversity, Oil spill, Pollution, Soil pollution, Water pollution	
	LOCATION Indonesia	
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Credible measures adopted	Credible measures adopted
	Measures initiated	Credible measures adopted

PT Sampoerna Agro Tbk		ISIN ID1000106107
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 15: Life on Land; 15.2: Sustainable management of all types of forests	QUARTER Q1 2022
THEMES	Air pollution, Climate change impacts, Deforestation, Environmental impacts	
	LOCATION Indonesia	
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Commitment expressed
	N/A	Commitment expressed

PVH Corp.		ISIN US6936561009
	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	Forced labour, Human rights due diligence, Modern slavery, Religious affiliation discrimination (social), Social discrimination	
	LOCATION China	
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Commitment expressed
	No measures announced	No measures announced

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 Air pollution		LOCATION France
ENGAGEMENT GOAL STATUS	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 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 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 Access to water / sanitation, Human rights due diligence, Indigenous rights, Right to health		LOCATION Peru
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated
THEMES Biodiversity, Water pollution		LOCATION Peru
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated


Rio Tinto Limited		ISIN AU000000RIO1
	SDG ALIGNMENT	QUARTER Q1 2022


	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	
THEMES	Human rights due diligence, Indigenous rights	
	LOCATION Australia	
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Commitment expressed

Rio Tinto Plc		ISIN GB0007188757
	SDG ALIGNMENT	QUARTER
	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	Q1 2022
THEMES	Human rights due diligence, Indigenous rights	
	LOCATION Australia	
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Commitment expressed

Samsung Electronics Co., Ltd.		ISIN KR7005930003
	SDG ALIGNMENT	QUARTER
	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	Q4 2022
THEMES	Union rights	
	LOCATION South Korea	
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Credible measures adopted	Credible measures adopted
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Credible measures adopted
THEMES	Bribery	
	LOCATION South Korea	
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
	TERMINATION OF PRACTICE	REMEDIAL ACTION

N/A	N/A
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Shell Plc		ISIN GB00BP6MXD84
	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 Q3 2022
THEMES Oil spill, Pollution, Soil pollution, Water pollution		LOCATION Nigeria
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated
THEMES Climate change impacts		LOCATION Australia
ENGAGEMENT GOAL STATUS	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Commitment expressed

Sibanye Stillwater Ltd.		ISIN ZAE000259701
	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 SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services, SDG 11: Sustainable Cities and Communities; 11.1: Access for all to adequate, safe and affordable housing, 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 Q3 2022
THEMES Workplace health and safety		LOCATION South Africa
ENGAGEMENT GOAL STATUS	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated
THEMES		LOCATION


Access to water / sanitation, Living standards		South Africa
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated


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 2021
THEMES Indigenous rights, Living standards, Right to life, Stakeholder consultation		LOCATION Laos
ENGAGEMENT GOAL STATUS	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 Forced labour, Human rights due diligence, Modern slavery, Religious affiliation discrimination (social), Social discrimination		LOCATION China
ENGAGEMENT GOAL STATUS	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 Union rights		LOCATION United States
DISCLOSURE		IMPLEMENTATION OF POLICIES

ENGAGEMENT GOAL STATUS	Commitment expressed	Commitment expressed
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	No measures announced	No measures announced

Stellantis NV		ISIN NL00150001Q9
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q2 2022
THEMES Air pollution, Pollution		LOCATION United States
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	No measures announced	No measures announced
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	No measures announced	No measures announced

STRABAG SE		ISIN AT000000STR1
	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 Access to water / sanitation, Living standards, Stakeholder consultation		LOCATION Chile
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Commitment expressed	Commitment expressed
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Commitment expressed


Sumitomo Chemical Co., Ltd.		ISIN JP3401400001
	SDG ALIGNMENT SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species	QUARTER Q2 2022
THEMES Biodiversity, Environmental impacts		LOCATION Several countries
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Measures initiated

Sumitomo Corp.		ISIN
		JP3404600003
	SDG ALIGNMENT 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; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q1 2022
THEMES Union rights		LOCATION Honduras
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated


Suncor Energy Inc.		ISIN
		CA8672241079
	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 Q2 2022
THEMES Environmental impacts		LOCATION Canada
ENGAGEMENT GOAL STATUS	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated


Target Corporation		ISIN
		US87612E1064
	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 Forced labour, Human rights due diligence, Modern slavery, Religious affiliation discrimination (social), Social discrimination		LOCATION China
ENGAGEMENT GOAL STATUS	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION No measures announced

Telefonaktiebolaget LM Ericsson		ISIN SE0000108656
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q4 2021
THEMES Bribery		LOCATION China
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A
THEMES Bribery		LOCATION Indonesia
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES N/A
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated
THEMES Bribery		LOCATION Saudi Arabia
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES N/A
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated
THEMES Bribery		LOCATION Vietnam
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES N/A
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated

TENMA Corp.		ISIN JP3547800007
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q4 2021
THEMES Bribery		LOCATION Vietnam
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated

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
THEMES Forced labour, Human rights due diligence, Modern slavery, Religious affiliation discrimination (social), Social discrimination		LOCATION China
ENGAGEMENT GOAL STATUS	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION N/A

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 Access to water / sanitation, Living standards, Stakeholder consultation		LOCATION Chile
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed

The Brinks Company		ISIN US1096961040
	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 Q1 2022
THEMES Union rights		LOCATION Colombia
ENGAGEMENT GOAL STATUS	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated

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	QUARTER Q3 2022
THEMES Human rights due diligence, Torture / inhumane treatment		LOCATION United States
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated
THEMES Forced labour, Living wage, Modern slavery		LOCATION United States
ENGAGEMENT GOAL STATUS	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced

Tokyo Electric Power Co. Holdings, Inc.		ISIN JP3585800000
	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 Q2 2022
THEMES Environmental impacts, Pollution, Radioactive pollution		LOCATION Japan
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated

Top Glove Corp. Bhd.		ISIN MYL71130O003
	SDG ALIGNMENT SDG 10: Reduced Inequalities; 10.7: Facilitate orderly, safe, regular and responsible migration, 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 Q1 2022

THEMES		LOCATION
Forced labour, Human rights due diligence, Modern slavery, Religious affiliation discrimination (social), Social discrimination		Malaysia
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Commitment expressed	Measures initiated
TERMINATION OF PRACTICE	REMEDIAL ACTION	
	Measures initiated	Measures initiated

TotalEnergies SE		ISIN
		FR0000120271
	SDG ALIGNMENT	QUARTER
	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	Q3 2022
THEMES		LOCATION
Oil spill, Pollution, Soil pollution, Water pollution		Nigeria
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
TERMINATION OF PRACTICE	REMEDIAL ACTION	
	Commitment expressed	Measures initiated
THEMES		LOCATION
Living standards, Stakeholder consultation		Uganda
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
TERMINATION OF PRACTICE	REMEDIAL ACTION	
	Measures initiated	Measures initiated

Transneft PJSC		ISIN
		RU0009091573
	SDG ALIGNMENT	QUARTER
	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	Q4 2021
THEMES		LOCATION
Oil spill, Pollution, Soil pollution, Water pollution		Russia
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
TERMINATION OF PRACTICE	REMEDIAL ACTION	
	No measures announced	Measures initiated

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 Living wage, Working conditions		LOCATION United States
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Commitment expressed
THEMES Working conditions		LOCATION United Kingdom
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Commitment expressed
THEMES Consumer health and safety, Consumer rights, Right to life		LOCATION United States
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

Urban Outfitters, Inc.		ISIN US9170471026
	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 Forced labour, Human rights due diligence, Modern slavery, Religious affiliation discrimination (social), Social discrimination		LOCATION China
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Commitment expressed

VEON Ltd.		ISIN BMG9349W1038
	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 2021
THEMES Union rights		LOCATION Bangladesh
ENGAGEMENT GOAL STATUS	DISCLOSURE Commitment expressed	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 Union rights		LOCATION United States
ENGAGEMENT GOAL STATUS	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 Air pollution, Pollution		LOCATION Germany
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

Walmart Inc.		ISIN US9311421039
	SDG ALIGNMENT	QUARTER Q2 2022

	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	
THEMES	Forced labour, Human rights due diligence, Modern slavery, Religious affiliation discrimination (social), Social discrimination	
	LOCATION China	
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Commitment expressed
	No measures announced	No measures announced

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

UNRESPONSIVE COMPANIES

This section lists all companies which as of 31 December 2022 remained unresponsive to either engagement enquiries sent during 2022, or reminders/escalations related to engagements initiated prior to 2022.


The list below provides an overview the unresponsive companies. The subsequent tables provide further details including the quarter and year of the initial engagement enquiry outreach, SDG alignment, engagement topic and controversy location, and a brief summary of the status of the engagement.


Companies unresponsive to engagements initiated in 2022


Adani Enterprises Limited	PG&E Corporation
COFCO Sugar Holding Co. Ltd.	Porsche Automobil Holding SE
Empresas Copec SA	Shandong Gold Mining Co., Ltd.
Export-Import Bank of India	Shikun & Binui Ltd.
Formosa Petrochemical Corp.	The Coca-Cola Company
G-III Apparel Group, Ltd.	Titas Gas Transmission & Distribution Co. Ltd.
Grupo Mexico S.A.B. de C.V.	Tongling Nonferrous Metals Group Co., Ltd.
Hangzhou Hikvision Digital Technology Co., Ltd.	Tyson Foods, Inc.
Iflytek Co., Ltd.	Universal Electronics Inc.
Kangmei Pharmaceutical Co., Ltd.	Volcan Compania Minera S.A.A.
Luckin Coffee, Inc.	Xiamen Meiya Pico Information Co., Ltd.
NTPC Limited	Zhejiang Dahua Technology Co. Ltd.

Companies unresponsive to engagements initiated in 2021, for which there were reminder/escalation activities in 2022

Alibaba Group Holding Limited
BLD Plantation Bhd.
Coal India Ltd.
Daqo New Energy Corp.
Ecopetrol SA
Gazprom Neft PJSC
GCL Technology Holdings Limited
Lens Technology Co., Ltd.
Power Construction Corporation of China, Ltd.
SLC Agricola SA
The Kansai Electric Power Co., Inc.

Adani Enterprises Limited		ISIN INE423A01024
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage, SDG 13: Climate Action; 13.3: Improve education, awareness-raising and human and institutional capacity on climate change, 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 Q2 2022
THEME Biodiversity, Climate change impacts, Environmental impacts		LOCATION Australia
STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.		
THEME Access to water / sanitation, Indigenous rights, Stakeholder consultation		LOCATION Australia
STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.		

Alibaba Group Holding Limited		ISIN KYG017191142
	SDG ALIGNMENT N/A	QUARTER Q3 2021
THEME Anti-competitive behaviour		LOCATION China
STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.		


BLD Plantation Bhd.		ISIN MYL506900009
	SDG ALIGNMENT SDG 15: Life on Land; 15.2: Sustainable management of all types of forests	QUARTER Q4 2021
THEME Biodiversity, Climate change impacts, Deforestation		LOCATION Malaysia
STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.		


Coal India Ltd.		ISIN INE522F01014
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	<p>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, 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 Q2 2022</p>
<p>THEME Air pollution, Pollution, Water pollution</p>		<p>LOCATION India</p>
<p>STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.</p>		
<p>THEME Industrial accident, Workplace health and safety</p>		<p>LOCATION India</p>
<p>STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.</p>		

<p>COFCO Sugar Holding Co. Ltd.</p>		<p>ISIN CNE000000LH8</p>
	<p>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</p>	<p>QUARTER Q3 2022</p>
<p>THEME Forced labour, Human rights due diligence, Modern slavery</p>		<p>LOCATION China</p>
<p>STATUS OF ENGAGEMENT The company did not respond to the initial engagement enquiry sent in Q3 2022. As such, it is subject to the reminder and escalation process and a reminder was sent to its Board of Directors on 7 February 2023.</p>		

<p>Daqo New Energy Corp.</p>		<p>ISIN US23703Q2030</p>
	<p>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</p>	<p>QUARTER Q3 2021</p>
<p>THEME Forced labour, Human rights due diligence, Modern slavery</p>		<p>LOCATION China</p>
<p>STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.</p>		

Ecopetrol SA		ISIN COC04PA00016
	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 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers, 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	QUARTER Q3 2021
THEME Union rights		LOCATION Colombia
STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.		
THEME Biodiversity, Oil spill, Pollution, Soil pollution, Water pollution		LOCATION Colombia
STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.		

Empresas Copec SA		ISIN CLP7847L1080
	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 Indigenous rights, Stakeholder consultation, Water pollution		LOCATION Chile
STATUS OF ENGAGEMENT The company did not respond to the initial engagement enquiry sent in Q3 2022. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 7 February 2023.		

Formosa Petrochemical Corp.		ISIN TW0006505001
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q4 2022
THEME Air pollution, Pollution		LOCATION Taiwan

STATUS OF ENGAGEMENT

The company did not respond to the initial engagement enquiry sent in Q4 2022. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 7 February 2023.

Gazprom Neft PJSC

ISIN
RU0009062467



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

QUARTER
Q4 2021

THEME

Environmental impacts, Oil spill, Pollution, Water pollution

LOCATION
Russia

STATUS OF ENGAGEMENT

Despite a reminder sent on 2 February 2022, no response had been received by 26 April when ISS ESG suspended the engagement as no progress is expected with the dialogue at this time. ISS ESG will continue to monitor developments in the issues and any measures taken and disclosures provided by the company to remediate, prevent and manage environmental risks at its operations in the Russian Arctic.

GCL Technology Holdings Limited

ISIN
KYG3774X1088



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 2021

THEME

Forced labour, Human rights due diligence, Modern slavery

LOCATION
China

STATUS OF ENGAGEMENT

As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.

G-III Apparel Group, Ltd.

ISIN
US36237H1014



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

Forced labour, Human rights due diligence, Modern slavery



LOCATION
China


STATUS OF ENGAGEMENT


The company did not respond to the initial engagement enquiry sent in Q3 2022. As such, it is subject to the reminder and escalation process and a reminder was sent to its Board of Directors on 7 February 2023.

Grupo Mexico S.A.B. de C.V.


ISIN
MXP370841019


	<p>SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, 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 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 Environmental impacts, Pollution, Waste management, Water pollution</p>		<p>LOCATION Mexico</p>
<p>STATUS OF ENGAGEMENT The company did not respond to the initial engagement enquiry sent in Q3 2022. As such, it is subject to the reminder and escalation process and a reminder was sent to its Board of Directors on 7 February 2023.</p>		
	<p>SDG ALIGNMENT SDG 10: Reduced Inequalities; 10.3: Equal opportunities of outcome</p>	<p>QUARTER Q3 2022</p>
<p>THEME Living standards, Stakeholder consultation</p>		<p>LOCATION Peru</p>
<p>STATUS OF ENGAGEMENT The company did not respond to the initial engagement enquiry sent in Q3 2022. As such, it is subject to the reminder and escalation process and a reminder was sent to its Board of Directors on 7 February 2023.</p>		


<p>Hangzhou Hikvision Digital Technology Co., Ltd.</p>		<p>ISIN CNE100000PM8</p>
	<p>SDG ALIGNMENT SDG 10: Reduced Inequalities; 10.3: Equal opportunities of outcome</p>	<p>QUARTER Q3 2022</p>
<p>THEME Human rights due diligence, Privacy, Racial discrimination (social), Religious affiliation discrimination (social), Social discrimination, Torture / inhumane treatment</p>		<p>LOCATION China</p>
<p>STATUS OF ENGAGEMENT The company did not respond to the initial engagement enquiry sent in Q3 2022. As such, it is subject to the reminder and escalation process and a reminder was sent to its Board of Directors on 7 February 2023.</p>		


<p>Iflytek Co., Ltd.</p>		<p>ISIN CNE100000B81</p>
	<p>SDG ALIGNMENT SDG 10: Reduced Inequalities; 10.3: Equal opportunities of outcome</p>	<p>QUARTER Q3 2022</p>
<p>THEME Human rights due diligence, Privacy, Racial discrimination (social), Religious affiliation discrimination (social), Social discrimination</p>		<p>LOCATION China</p>
<p>STATUS OF ENGAGEMENT The company did not respond to the initial engagement enquiry sent in Q3 2022. As such, it is subject to the reminder and escalation process and a reminder was sent to its Board of Directors on 7 February 2023.</p>		

<p>Kangmei Pharmaceutical Co., Ltd.</p>		<p>ISIN CNE0000017M1</p>
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	SDG ALIGNMENT SDG 10: Reduced Inequalities; 10.3: Equal opportunities of outcome	QUARTER Q1 2022
THEME Accounting / disclosure standards		LOCATION China
STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.		


Lens Technology Co., Ltd.		ISIN CNE100001YW7
	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 2021
THEME Forced labour, Human rights due diligence, Modern slavery		LOCATION China
STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.		


Luckin Coffee, Inc.		ISIN US54951L1098
	SDG ALIGNMENT N/A	QUARTER Q1 2021
THEME Accounting / disclosure standards		LOCATION China
STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.		

NTPC Limited		ISIN INE733E01010
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage, SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning, 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 Q1 2022


THEME	Air pollution, Biodiversity, Climate change impacts, Environmental impacts, Pollution, Water pollution	LOCATION	Bangladesh
STATUS OF ENGAGEMENT			
As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.			


PG&E Corporation		ISIN	US69331C1080
	SDG ALIGNMENT	QUARTER	Q4 2022
	SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages		
THEME	Consumer health and safety, Consumer rights, Living standards, Right to health, Right to life	LOCATION	United States
STATUS OF ENGAGEMENT			
The company did not respond to the initial engagement enquiry sent in Q4 2022. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 7 February 2023.			


Porsche Automobil Holding SE		ISIN	DE000PAH0038
	SDG ALIGNMENT	QUARTER	Q4 2022
	SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes		
THEME	Air pollution, Pollution	LOCATION	Germany
STATUS OF ENGAGEMENT			
The company did not respond to the initial engagement enquiry sent in Q4 2022. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 7 February 2023.			


Power Construction Corporation of China, Ltd.		ISIN	CNE1000017G1
	SDG ALIGNMENT	QUARTER	Q4 2021
	SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage, SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species		
THEME	Biodiversity, Deforestation, Environmental impacts	LOCATION	Tanzania
STATUS OF ENGAGEMENT			
As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.			

Shandong Gold Mining Co., Ltd.		ISIN	CNE1000036N7
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	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage, SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species	QUARTER Q3 2022
THEME Environmental impacts, Pollution, Waste management, Water pollution	LOCATION Argentina	
STATUS OF ENGAGEMENT The company did not respond to the initial engagement enquiry sent in Q3 2022. As such, it is subject to the reminder and escalation process and a reminder was sent to its Board of Directors on 7 February 2023.		


Shikun & Binui Ltd.		ISIN IL0010819428
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q1 2022
THEME Bribery	LOCATION Kenya	
STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.		


SLC Agricola SA		ISIN BRSLCEACNOR2
	SDG ALIGNMENT SDG 15: Life on Land; 15.2: Sustainable management of all types of forests, SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species	QUARTER Q3 2021
THEME Biodiversity, Climate change impacts, Deforestation, Environmental impacts	LOCATION Brazil	
STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.		

The Coca-Cola Company		ISIN US1912161007
	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
THEME Union rights, Working conditions	LOCATION Philippines	
STATUS OF ENGAGEMENT The company did not respond to the initial engagement enquiry sent in Q4 2022. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 7 February 2023.		

THEME	LOCATION
Union rights	Indonesia
STATUS OF ENGAGEMENT	
The company did not respond to the initial engagement enquiry sent in Q4 2022. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 7 February 2023.	

The Kansai Electric Power Co., Inc.		ISIN
		JP3228600007
	SDG ALIGNMENT	QUARTER
	SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	Q4 2021
THEME	LOCATION	
Bribery	Japan	
STATUS OF ENGAGEMENT		
As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.		

Titas Gas Transmission & Distribution Co. Ltd.		ISIN
		BD0311TGAS01
	SDG ALIGNMENT	QUARTER
	SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages	Q1 2022
THEME	LOCATION	
Right to health, Right to life	Bangladesh	
STATUS OF ENGAGEMENT		
As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.		

Tongling Nonferrous Metals Group Co., Ltd.		ISIN
		CNE000000529
	SDG ALIGNMENT	QUARTER
	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	Q2 2019
THEME	LOCATION	
Access to water / sanitation, Human rights due diligence, Indigenous rights, Stakeholder consultation	Peru	
STATUS OF ENGAGEMENT		
As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.		


Tyson Foods, Inc.		ISIN
		US9024941034

	<p>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</p>	<p>QUARTER Q4 2022</p>
<p>THEME Workplace health and safety</p>		<p>LOCATION United States</p>
<p>STATUS OF ENGAGEMENT The company did not respond to the initial engagement enquiry sent in Q4 2022. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 7 February 2023.</p>		

<p>Universal Electronics Inc.</p>		<p>ISIN US9134831034</p>
	<p>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</p>	<p>QUARTER Q1 2022</p>
<p>THEME Forced labour, Human rights due diligence, Modern slavery</p>		<p>LOCATION China</p>
<p>STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.</p>		

<p>Volcan Compania Minera S.A.A.</p>		<p>ISIN PEP648014202</p>
	<p>SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, 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 Q4 2022</p>
<p>THEME Pollution, Waste management, Water pollution</p>		<p>LOCATION Peru</p>
<p>STATUS OF ENGAGEMENT The company did not respond to the initial engagement enquiry sent in Q4 2022. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 7 February 2023.</p>		

<p>Xiamen Meiya Pico Information Co., Ltd.</p>		<p>ISIN CNE100001120</p>
	<p>SDG ALIGNMENT SDG 10: Reduced Inequalities; 10.3: Equal opportunities of outcome</p>	<p>QUARTER Q3 2022</p>
<p>THEME Human rights due diligence, Privacy, Racial discrimination (social), Religious affiliation discrimination (social), Social discrimination</p>		<p>LOCATION China</p>
<p>STATUS OF ENGAGEMENT The company did not respond to the initial engagement enquiry sent in Q3 2022. As such, it is subject to the reminder and escalation process and a reminder was sent to its Board of Directors on 7 February 2023.</p>		

Zhejiang Dahua Technology Co. Ltd.		ISIN CNE100000BJ4
	SDG ALIGNMENT SDG 10: Reduced Inequalities; 10.3: Equal opportunities of outcome	QUARTER Q3 2022
THEME Human rights due diligence, Privacy, Religious affiliation discrimination (social), Social discrimination		LOCATION China
STATUS OF ENGAGEMENT The company did not respond to the initial engagement enquiry sent in Q3 2022. As such, it is subject to the reminder and escalation process and a reminder was sent to its Board of Directors on 7 February 2023.		

CLOSED ENGAGEMENTS

The following engagements conducted on behalf of participating investors were closed during 2022, either as a result of measures taken by the company to resolve the controversy, or developments in the controversy itself. These engagements began in 2022 or a previous year.

The list below provides an overview of the companies with which engagement was closed during 2022. The subsequent tables provide further details, including the quarter of initial outreach, SDG alignment, topic theme and location, and the motivation for closing the engagement.

Closed engagements, initiated in 2022

Biora Therapeutics, Inc.
Export-Import Bank of India
FCA US LLC
ING Bank NV
ING Groep NV
Mitsubishi Electric Corp.
Samvardhana Motherson International Limited

Closed engagements, initiated in 2021


Ackermans & van Haaren NV
Airbus SE
Almirall SA
Banglalink Digital Communications Ltd.
China National Petroleum Corp.
China Three Gorges Corp.
Google LLC
NLC India Ltd.
Petroleos Mexicanos EPE
Samarco Mineracao SA
SIPEF SA/NV
Teollisen yhteistyön rahasto Oy
VEON Holdings BV

Ackermans & van Haaren NV		ISIN BE0003764785
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q4 2021
THEME Bribery		LOCATION Russia
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded from Amber, Score 8 (Alleged failure) to Green, Score 5 (Under observation). This change occurred because, in investor dialogue facilitated by ISS ESG in March 2022, Ackermans & van Haaren NV disclosed its subsidiary Dredging Environmental & Marine Engineering NV's compliance program, and measures taken by the company to prevent corruption. While considerable time has elapsed since the occurrence of the bribery allegations, ISS ESG remains vigilant of developments. Given the updated Green signal of this controversy, there is no need for further engagement at this time.		


Airbus SE		ISIN NL0000235190
	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 2021
THEME Union rights		LOCATION United States
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded from Amber, Score 8 (Alleged failure) to Green, Score 4 (Undergoing remediation). This change occurred because an independent social assurance provider, in November 2021, found no labour law violations or anti-union practices at the company's plant in Alabama, United States. While no renewed allegations have been raised by local unions at the facility since 2019, ISS ESG continues to monitor the effectiveness of the company's commitment to respect workers' union rights. Given the updated Green signal of this controversy, there is no need for further engagement at this time.		

Airbus SE		ISIN NL0000235190
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q3 2021
THEME Bribery		LOCATION Kuwait
MOTIVATION FOR CLOSING ENGAGEMENT		


ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded from Amber, Score 6 (Fragmentary information) to Green, Score 2 (Past involvement). This change occurred because of the extended time that has elapsed since the misconduct, the lack of updates regarding the investigations by the Kuwaiti General Headquarters and the Kuwaiti parliament, and no renewed allegations as of May 2022. In communication with investors facilitated by ISS ESG in March 2021 and March 2022, Airbus stated that it continued to strengthen its Ethics & Compliance Program regarding anti-bribery and corruption. Thus, ISS ESG assesses that this controversy is no longer current, leading to no further need for engagement.


Almirall SA		ISIN ES0157097017
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q4 2021
THEME Bribery		LOCATION United States
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded from Amber, Score 7 (Verified failure, undergoing remediation) to Green, Score 2 (Past involvement). This change occurred because considerable time has elapsed since the misconduct, and there has been no renewed allegation since Almirall SA agreed to a settlement in May 2019 with the U.S. Department of Justice and the California Department of Insurance to resolve kickback payment claims. Although Almirall has remained unresponsive to ISS ESG's request for further information on its remedial measures, ISS ESG assesses this controversy to be no longer current, leading to no further need for engagement.		

Banglalink Digital Communications Ltd.		ISIN USY0629LAA53
	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 2021
THEME Union rights		LOCATION Bangladesh
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG has discontinued this engagement as the Norm-Based Engagement dialogue will be focused on publicly listed companies. ISS ESG will continue to monitor developments for VEON Ltd.		

Biora Therapeutics, Inc.		ISIN US74319F3055
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q1 2022

THEME	LOCATION
Bribery	United States
MOTIVATION FOR CLOSING ENGAGEMENT	
<p>ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded from Amber, Score 7 (Verified failure undergoing remediation) to Green, Score 4 (Undergoing remediation). This change occurred because, in March 2022, the United States Office of Inspector General of the Department of Health and Human Services suspended most of the Corporate Integrity Agreement (CIA) obligations imposed on Biora Therapeutics, Inc. about compliance with anti-bribery statutes. ISS ESG will continue to monitor the completion of other CIA obligations. ISS ESG assesses that this controversy is no longer current, leading to no further need for engagement.</p>	

China National Petroleum Corp.		ISIN
		CND100002XJ6
	SDG ALIGNMENT	QUARTER
	<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>	Q4 2021
THEME	LOCATION	
Oil spill, Pollution, Soil pollution, Waste management, Water pollution	South Sudan	
MOTIVATION FOR CLOSING ENGAGEMENT		
<p>ISS ESG has discontinued this engagement as the Norm-Based Engagement dialogue will be focused on publicly listed companies.</p>		

China Three Gorges Corp.		ISIN
		CND0000004T5
	SDG ALIGNMENT	QUARTER
	<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, SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species</p>	Q3 2021
THEME	LOCATION	
Forced displacement, Indigenous rights, Living standards, Stakeholder consultation	Brazil	
MOTIVATION FOR CLOSING ENGAGEMENT		
<p>ISS ESG has discontinued this engagement as the Norm-Based Engagement dialogue will be focused on publicly listed companies. ISS ESG will continue to monitor developments for China Yangtze Power Co., Ltd.</p>		

China Three Gorges Corp.		ISIN CND0000004T5
	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 Q3 2021
THEME Forced displacement, Living standards, Stakeholder consultation		LOCATION Guinea
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG has discontinued this engagement as the Norm-Based Engagement dialogue will be focused on publicly listed companies.		

China Three Gorges Corp.		ISIN CND0000004T5
	SDG ALIGNMENT 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 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species	QUARTER Q3 2021
THEME Biodiversity, Environmental impacts		LOCATION China
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG has discontinued this engagement as the Norm-Based Engagement dialogue will be focused on publicly listed companies. ISS ESG will continue to monitor developments for China Yangtze Power Co., Ltd.		


Export-Import Bank of India		ISIN INE514E08CE7
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage, SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning, 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 Q1 2022
THEME Air pollution, Biodiversity, Climate change impacts, Environmental impacts, Pollution, Water pollution		LOCATION Bangladesh
MOTIVATION FOR CLOSING ENGAGEMENT		


ISS ESG has discontinued this engagement as the Norm-Based Engagement dialogue will be focused on publicly listed companies. ISS ESG will continue to monitor developments for Bharat Heavy Electricals Limited and NTPC Limited.


FCA US LLC		ISIN US17121HAA86
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q2 2022
THEME Air pollution, Pollution		LOCATION United States
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG has discontinued this engagement as the Norm-Based Engagement dialogue will be focused on publicly listed companies. ISS ESG will continue to monitor developments for Stellantis NV.		

Google LLC		ISIN US38259PAD42
	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 2021
THEME Workplace health and safety		LOCATION United States
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG has discontinued this engagement as the Norm-Based Engagement dialogue will be focused on publicly listed companies. ISS ESG will continue to monitor developments for Alphabet, Inc.		


Google LLC		ISIN US38259PAD42
	SDG ALIGNMENT N/A	QUARTER Q3 2021
THEME Anti-competitive behaviour		LOCATION Several countries
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG has discontinued this engagement as the Norm-Based Engagement dialogue will be focused on publicly listed companies. ISS ESG will continue to monitor developments for Alphabet, Inc.		


Google LLC		ISIN US38259PAD42
	SDG ALIGNMENT N/A	QUARTER Q3 2021
THEME Consumer privacy, Consumer rights		LOCATION France
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG has discontinued this engagement as the Norm-Based Engagement dialogue will be focused on publicly listed companies. ISS ESG will continue to monitor developments for Alphabet, Inc.		

ING Bank NV		ISIN NL0006420150
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.4: Reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organized crime	QUARTER Q1 2022
THEME Money laundering		LOCATION Spain
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded from Amber, Score 8 (Alleged failure) to Green, Score 5 (Under observation). This change occurred because, even though ING Groep NV's wholly owned subsidiary ING Bank NV refused to comment on the status of the ongoing investigation, it provided information about its anti-money laundering enhancement programme and remedial measures taken. While considerable time has elapsed since the occurrence of the controversy, ISS ESG remains vigilant of developments in the investigations and confirmation of the efficacy of ING Groep's remedial measures. Given the updated Green signal of this controversy, there is no need for further engagement at this time.		

ING Groep NV		ISIN NL0011821202
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.4: Reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organized crime	QUARTER Q1 2022
THEME Money laundering		LOCATION Spain
MOTIVATION FOR CLOSING ENGAGEMENT		

ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded from Amber, Score 8 (Alleged failure) to Green, Score 5 (Under observation). This change occurred because, even though ING Groep NV's wholly owned subsidiary ING Bank NV refused to comment on the status of the ongoing investigation, it provided information about its anti-money laundering enhancement programme and remedial measures taken. While considerable time has elapsed since the occurrence of the controversy, ISS ESG remains vigilant of developments in the investigations and confirmation of the efficacy of ING Groep's remedial measures. Given the updated Green signal of this controversy, there is no need for further engagement at this time.

Mitsubishi Electric Corp.		ISIN JP3902400005
	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 Q1 2022
THEME Union rights		LOCATION Thailand
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded from Amber, Score 8 (Alleged failure) to Green, Score 4 (Undergoing remediation). This change occurred because in March 2022, Mitsubishi Electric informed ISS ESG that it has taken remedial measures in accordance with the Thai Supreme Court's order to reinstate and pay back wages to the union president and settled the dispute the local union and IndustriALL. Given the updated Green signal of this controversy, there is no need for further engagement at this time.		

NLC India Ltd.		ISIN INE589A01014
	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 2021
THEME Industrial accident, Workplace health and safety		LOCATION India
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded from Amber, Score 8 (Alleged failure) to Green, Score 5 (Under observation). This change occurred because there has been a lack of concrete allegations of unsafe working conditions directed toward NLC India Ltd. since 2020. While the company reported ongoing safety initiatives apart from its compliance with statutory requirements for enhancing safety standards, it is yet to disclose details on any internal investigations and demonstrate the efficacy of health and safety measures. ISS ESG remains vigilant of developments. Given the updated Green signal of this controversy, there is no need for further engagement at this time.		


Petroleos Mexicanos EPE		ISIN US71654QDD16
SDG ALIGNMENT		QUARTER


	<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>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 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>Q4 2021</p>
<p>THEME</p> <p>Biodiversity, Oil spill, Pollution, Soil pollution, Water pollution, Workplace health and safety</p>		<p>LOCATION</p> <p>Mexico</p>
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>ISS ESG has discontinued this engagement as the Norm-Based Engagement dialogue will be focused on publicly listed companies.</p>		

<p>Samarco Mineracao SA</p>		<p>ISIN</p> <p>USP84050AB29</p>
	<p>SDG ALIGNMENT</p> <p>SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, 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 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services, SDG 11: Sustainable Cities and Communities; 11.1: Access for all to adequate, safe and affordable housing, 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</p>	<p>QUARTER</p> <p>Q1 2021</p>
<p>THEME</p> <p>Environmental impacts, Pollution, Soil pollution, Waste management, Water pollution, Access to water / sanitation, Environmental impacts, Indigenous rights, Living standards, Right to health, Right to life, Stakeholder consultation, Workplace health and safety</p>		<p>LOCATION</p> <p>Brazil</p>
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>ISS ESG has discontinued this engagement as the Norm-Based Engagement dialogue will be focused on publicly listed companies.</p>		

<p>Samvardhana Motherson International Limited</p>		<p>ISIN</p> <p>INE775A01035</p>
	<p>SDG ALIGNMENT</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>QUARTER</p> <p>Q2 2022</p>

THEME	LOCATION
Union rights	Mexico
MOTIVATION FOR CLOSING ENGAGEMENT	
<p>ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded from Amber, Score 8 (Alleged failure) to Green, Score 4 (Undergoing remediation). This change occurred because no renewed allegations or unresolved allegations have been raised by Los Mineros union, a local affiliate of the global trade union federation IndustriALL. In an investor dialogue facilitated by ISS ESG in July 2022, Samvardhana Motherson International Ltd. shared that the legal case between the two unions was resolved by the Mexican supreme court and the Confederation of Mexican Workers was confirmed as the legal representative of the employees. Thus, ISS ESG assesses that this controversy is no longer current, leading to no further need for engagement.</p>	

SIPEF SA/NV		ISIN
		BE0003898187
	SDG ALIGNMENT	QUARTER
	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	Q3 2021
THEME	LOCATION	
Gender discrimination (workplace), Living wage, Sexual harassment (workplace), Union rights, Working conditions, Workplace discrimination, Workplace health and safety	Indonesia	
MOTIVATION FOR CLOSING ENGAGEMENT		
<p>ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded from Amber, Score 8 (Alleged failure) to Green, Score 4 (Undergoing remediation). This change occurred because in June 2022, a complaint raised through the Roundtable on Sustainable Palm Oil (RSPO) in March 2021, alleging that SIPEF SA/NV's 95% owned subsidiary, PT Agro Kati Lama mostly employed casual workers, was resolved. Additionally, in communication with ISS ESG, SIPEF noted that the RSPO's Dispute Settlement Facility had initiated a grievance mediation process and that employees and unions had agreed to the remediation measures adopted by the company. As no new allegations have emerged against the company, ISS ESG assesses that this controversy is no longer current, leading to no further need for engagement at this time.</p>		

Teollisen yhteistyön rahasto Oy		ISIN
		FI4000532916
	SDG ALIGNMENT	QUARTER
	SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services, 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	Q3 2021
THEME	LOCATION	
Indigenous rights, Living standards, Stakeholder consultation	Kenya	
MOTIVATION FOR CLOSING ENGAGEMENT		
<p>ISS ESG has discontinued this engagement as the Norm-Based Engagement dialogue will be focused on publicly listed companies. ISS ESG will continue to monitor developments for Vestas Wind Systems A/S.</p>		

VEON Holdings BV		ISIN US92718WAE93
	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 2021
THEME Union rights		LOCATION Bangladesh
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG has discontinued this engagement as the Norm-Based Engagement dialogue will be focused on publicly listed companies. ISS ESG will continue to monitor developments for VEON Ltd.		

COMPANIES UNRESPONSIVE TO LONG-STANDING CONTROVERSIES

The following section identifies companies that continue to be involved in long-standing controversies and where progress is yet to be seen in Norm-Based Engagement. While ISS ESG will continue to monitor the feasibility of engagement, investor clients may consider these companies and engagement topics for further due diligence.

The identification has been made by ISS ESG on the basis of companies which have – in more than one engagement cycle – been either unresponsive or where responses have been deemed poor, as the company did not address the ESG topic(s), the engagement questions posed or provide information on the management of the issue. The identification also considered where the status for the engagement goals set for Norm-Based Engagement remain at ‘no measures announced’. A further factor of consideration is the status of the controversies as well as fact-finding dialogue with the company conducted under Norm-Based Research.

For additional due diligence, investor clients may also want to consider companies with which engagement on specific topics has been discontinued, but where the controversy remains ongoing.²

Adani Enterprises Limited			ISIN INE423A01024
ENGAGEMENT CYCLES	ENGAGEMENT STATUS	TOPIC	
Q1 2017	Suspended	Alleged failure to mitigate climate change impacts and to assess environmental impact in Queensland, Australia	
Q1 2019		Alleged failure to respect indigenous rights at the Carmichael mine in Australia	
Q2 2022			
<p>ENGAGEMENT STATUS SUMMARY ISS ESG has attempted to engage with Adani Enterprises Limited on behalf of participating investors in Q1 2017, Q1 2019 and Q2 2022. However, the company has failed to respond to the investor enquiries despite repeated reminders and escalations. The engagement has been suspended since December 2022.</p>			

China Yangtze Power Co., Ltd.			ISIN CNE000001G87
ENGAGEMENT CYCLES	ENGAGEMENT STATUS	TOPIC	
Q3 2015	Suspended	Alleged failure to prevent depletion of biodiversity at Gezhouba and Three Gorges dams in China (operator)	
Q4 2019			
Q3 2021			

² To identify discontinued engagements, download the Activity Report from the Pooled Engagement Tool and within the ‘Topic-level Information’ tab, filter Column AD “Recent Activity” and select “Engagement discontinued”. To view the current NBR score of engagements, within the same tab, filter Column H “Current Norm-Based Research Score”.

ENGAGEMENT STATUS SUMMARY

ISS ESG has attempted to engage with China Yangtze Power Co., Ltd. on behalf of participating investors in Q3 2015, Q4 2019 and Q3 2021. While the first two engagement cycles did not yield any response from the company, in December 2021 the company provided a “poor” quality response to the Q3 2021 investor enquiry. The company referred to its 2020 ESG Report, Group Sustainability Report, and related news reports but did not provide sufficient details regarding policies and measures implemented to assess the environmental impact, mitigation measures implemented and the status of conservation and restoration programs. The engagement has been suspended since April 2022.

Ecopetrol SA			ISIN COC04PA00016
ENGAGEMENT CYCLES Q2 2016 Q3 2018 Q3 2021	ENGAGEMENT STATUS Suspended	TOPIC Alleged failure to respect union rights in Colombia Alleged failure to prevent and remediate soil and water pollution in Colombia	

ENGAGEMENT STATUS SUMMARY

ISS ESG has attempted to engage with Ecopetrol SA on behalf of participating investors in Q2 2016, Q3 2018 and Q3 2021. While the company provided a response assessed as “good” in April 2017 to the Q2 2016 investor enquiry and outlined steps to address the allegations, the controversies remain unresolved. The company failed to respond to ISS ESG’s subsequent investor enquiries in Q3 2018 and Q3 2021 despite repeated reminders and escalations. The engagement has been suspended since February 2023.

Hon Hai Precision Industry Co., Ltd.			ISIN TW0002317005
ENGAGEMENT CYCLES Q1 2020 Q4 2020	ENGAGEMENT STATUS Suspended	TOPIC Alleged failure to respect the right to just and favourable conditions of work in China	

ENGAGEMENT STATUS SUMMARY

ISS ESG has attempted to engage with Hon Hai Precision Industry Co., Ltd. on behalf of participating investors in Q1 2020 and Q4 2020. After a reminder to IR and further escalation to the CEO, the company provided a response to the Q1 2020 investor enquiry in September 2020, which was assessed as “adequate”, and outlined steps to address allegations, such as its establishment of an audit team, grievance channels and policies. However, the company failed to respond to the subsequent Q4 2020 investor enquiry despite repeated reminders and escalations. The engagement has been suspended since February 2022.

Tongling Nonferrous Metals Group Co., Ltd.			ISIN CNE000000529
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ENGAGEMENT CYCLES	ENGAGEMENT STATUS	TOPIC
Q4 2013 Q2 2015 Q2 2019 Q2 2022	Suspended	Alleged failure to respect indigenous rights in Peru Alleged failure to prevent pollution in China

ENGAGEMENT STATUS SUMMARY

ISS ESG has attempted to engage with Tongling Nonferrous Metals Group Co., Ltd. on behalf of participating investors concerning the company’s alleged failure to prevent pollution in China in Q4 2013, Q2 2015, Q2 2019 and most recently in Q2 2022. The Q2 2019 engagement cycle also concerned alleged failure to respect indigenous rights in Peru. However, the company has failed to respond to ISS ESG’s investor enquiries despite repeated reminders and escalations. The engagement has been suspended since December 2022.

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