



ISS ESG

**COLLABORATIVE
ENGAGEMENT**



NORM-BASED ENGAGEMENT

Q4 2021 Progress Report

(for the period of 1 October 2021 to 31 December 2021)

11 February 2022



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INTRODUCTION

The Norm-Based Engagement Quarterly Report for Q4 2021 consists of five parts. The first part provides a description of ISS ESG's Norm-Based Engagement Solution, which is conducted on behalf of investors with companies that have been assessed under ISS ESG's Norm-Based Research to be facing alleged or verified severe, systematic, or systemic failures to respect international norms and guidelines on responsible business conduct.

The latter sections of the report provide details of progress of engagement activities that were carried out on behalf of institutional investors in Q4 2021:

- The second part of the report presents summary statistics of engagements initiated in Q4 2021.
- The third part highlights notable engagements carried out in Q4 2021.
- The fourth part provides summaries of engagement responses received in Q4 2021.
- The fifth part provides an overview of responsiveness to letters sent out in Q4 2021.

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](#).

ENGAGEMENT APPROACH

ISS ESG’s Norm-Based Engagement Solution facilitates engagement with issuers on behalf of clients who would like to encourage corporate disclosure of efforts taken to manage or mitigate the environmental and social risks connected to business activities or operations. Through ISS ESG’s Norm-Based Engagement Solution, clients can focus on companies that are assessed under ISS ESG Norm-Based Research to be involved in alleged or verified severe, systematic, or systemic failures to respect international norms.

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

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

ENGAGEMENT CYCLE

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



Figure 1: Simplified Norm-Based Engagement timeline.

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

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

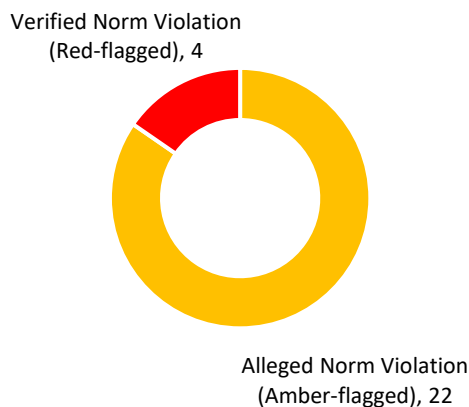
STATISTICS FOR ENGAGEMENT INITIATED IN Q4 2021

In Q4 2021, ISS ESG initiated Norm-Based Engagement on behalf of investors with 26 companies, covering 32 individual ESG topics.

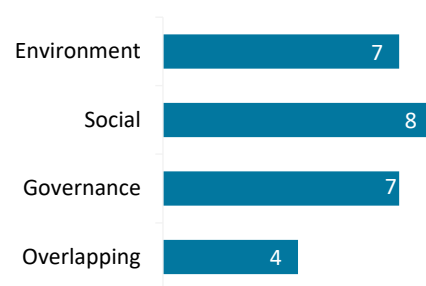
Of these 26 companies, four were Red flagged and the remainder Amber flagged, according to ISS ESG’s Norm-Based Research methodology. By 31 December 2021, ISS ESG had received responses from 10 of the 26 companies to which investor enquiries had been sent on 15 October 2021. This constitutes an overall response rate of 38 percent.

To assist investors with their reporting, the statistics presented below are based on the companies with which engagement was initiated in Q4 2021.

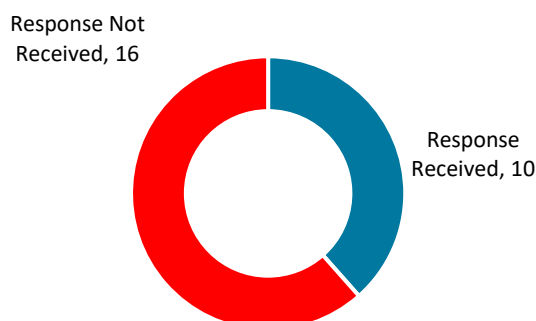
Verified or Alleged Failure to Respect Established Norms



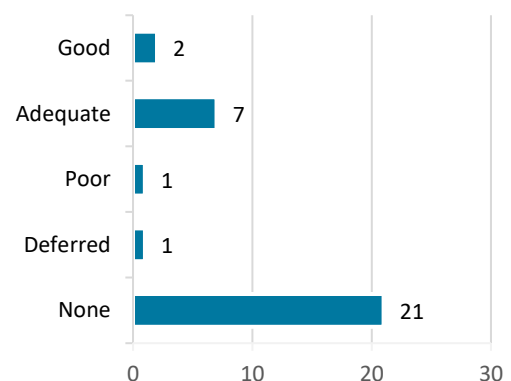
ESG Area Breakdown



Response Rate



Quality of Participation on Engagement Topics (as defined in footnote)



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

NOTABLE ENGAGEMENT ACTIVITY IN Q4 2021


The cases below are examples of notable Norm-Based Engagement activity carried out on behalf of investors in Q4 2021.


<p>Ratch Group Public Co. Ltd.</p>	<p>ISIN TH0637010008</p>
<p>THEME Indigenous rights, Living standards</p>	<p>LOCATION Laos</p>
<p>ACTIVITY SUMMARY</p>	<p>In Q4 2021, the pool of investors shared a letter with, Ratch Group Public Co. Ltd. regarding the company’s involvement in failure to respect the right to an adequate standard of living at Xe-Pian Xe-Namnoy dam in Laos (operator).</p> <p>In December 2021, Ratch Group provided a detailed written response to the investor enquiry, outlining due diligence steps conducted prior to participating in the Xe-Pian Xe-Namnoy dam and details regarding the remediation and compensation efforts implemented by the operating consortium and the Government of Laos (GOL) after the August 2018 accident. The company stated that Xe-Pian Xe-Namnoy Co. Ltd. (PNPC), the consortium operating the project, in which Ratch Group owns a 25% stake, completed a feasibility study as well as an Environmental and Social Impact Assessment Study covering due diligence, project assumption analysis, project stability evaluation, and project risk assessment and management. The GOL officially approved the project, considering it economically, technically, environmentally, and socially comprehensive. In terms of remedial action, since the accident occurred, PNPC has been collaborating with Lao authorities to implement emergency rescue, temporary relief, compensation, rehabilitation, and restoration for the affected communities, in line with a Master Plan defined by the GOL. PNPC has agreed with the GOL to fund approximately \$95 million to cover compensations and to fund the rehabilitation of impacted villages, including the rebuilding of new permanent houses, public infrastructure and vocational support. To date, all local community households have signed their compensation calculation form and signed a release of liability stating they are satisfied with the amount.</p> <p>ISS ESG notes the details Ratch Group has provided in this engagement. However, the company has yet to respond to the concerns raised by a group of United Nations Special Rapporteurs in May 2020, regarding the standard of living of impacted communities. In light of continued allegations, and in the absence of an authoritative third-party confirmation of the improvement of the situation at the site, ISS ESG continues to monitor developments. Based on the information provided by Ratch Group, ISS ESG determined that the company had initiated measures regarding disclosing relevant information, remedial action and termination of problematic policies.</p> <p>ISS ESG has since suspended this engagement, pending further developments on the company’s remedial measures and will continue to monitor progress and efficacy of the measures taken.</p>

Transneft PJSC		ISIN RU0009091573
THEME Environmental impacts	LOCATION Russia	
ACTIVITY SUMMARY	<p>In Q4 2021, the pool of investors shared a letter with Transneft PJSC regarding the company’s alleged failure to prevent water and soil pollution in Russia.</p> <p>In December 2021, Transneft provided a detailed written response to the investor enquiry highlighting the measures that ensure ecological compliance, minimize its environmental footprint, and provide environmental safety. Transneft’s safety measures across its pipeline operations included 1) replacement and reconstruction of pipeline sections that were made of low-quality steel or had defects; 2) upgrading fuel tanks to meet regulatory requirements; 3) reconstruction and replacement of equipment, pipeline technology, and components of pumping stations and other systems to increase reliability; and 4) routine drills on emergency oil response.</p> <p>The company also stated that there were only two incidents that caused significant environmental damage in 2020 and the beginning of 2021, both caused by illegal tapping. The first occurrence spilled petroleum products over 9.5 square meters. Remediation is slated for completion by 2022 and no environmental fines were levied. The second spilled petroleum products over 7.5 square meters. The reclamation area is 0.1145 hectares. Remediation was completed in 2021 and no environmental fines were levied. Additionally, Transneft stated that no incidents resulting in loss of life have been recorded in 2020-2021 and that there were no significant claims from national agencies against the company regarding environmental damage from spills. Transneft shared the 2018-2019 benchmarking report created by KPMG for Transneft that compares Transneft’s performance on economic, environmental, and social indicators to other companies.</p> <p>ISS ESG notes the disclosure of information regarding the oil spills occurring in 2021 and measures implemented to mitigate and remediate severe environmental impacts due to oil spills at its operations. However, the company has yet to provide documents supporting these claims, including third-party verification, in order to adequately address investor queries and to sufficiently assess the efficacy of the company’s remediation and mitigating measures as well as the implementation of policies on environmental management.</p> <p>ISS ESG continues to monitor developments and has sent follow-up questions on behalf of investors to request third-party documentation concerning the efficacy of the company’s measures to improve environmental safety and to remedy the impact of oil spills at its operations.</p>	


SUMMARY OF ENGAGEMENT CONDUCTED IN Q4 2021


The following pages list engagement dialogues that occurred during Q4 2021 for engagements that commenced in Q4 2021 or earlier. These tables present the milestones achieved against the targets established for each engagement. Not included are deferred responses, in which the company acknowledged receiving the engagement letter but did not provide responses to the provided questions, committing to do so in the future.

Accenture Plc		ISIN IE00B4BNMY34
	<p>SDG ALIGNMENT SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages</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>	QUARTER Q3 2021
THEME Labour rights: Safe and Healthy Working Conditions		LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced


Alphabet Inc.		ISIN US02079K1079
	<p>SDG ALIGNMENT SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages</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>	QUARTER Q3 2021
THEME Labour rights: Safe and Healthy Working Conditions		LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed
THEME Corruption: Anti-competitive behavior		LOCATION Several Countries
	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced


GOALS SET & MILESTONES ACHIEVED	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated
THEME Human rights: Consumer privacy		LOCATION France
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated


ALROSA PJSC		ISIN RU0007252813
	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	QUARTER Q2 2021
THEME Environment: Environmental impacts		LOCATION Russia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE NA	REMEDIAL ACTION Measures initiated

Amazon.com, Inc.		ISIN US0231351067
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers, 8.5: Achieve full and productive employment and decent work for all women and men SDG 10: Reduced Inequalities; 10.1: Achieve and sustain income growth	QUARTER Q1 2021
THEME Labour rights: Safe and Healthy Working Conditions		LOCATION Several countries
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced


THEME Labour rights: Union rights		LOCATION Several countries
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced


ArcelorMittal SA		ISIN US03938LAL80
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q1 2021
THEME Environment: Environmental impacts		LOCATION Several countries
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced

Cargill, Inc.		ISIN US141781AX24
	SDG ALIGNMENT SDG 15: Life on Land; 15.2: Sustainable management of all types of forests, 15.5: Protect and prevent the extinction of threatened species	QUARTER Q4 2021
THEME Environment: Depletion of Biodiversity		LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Measures initiated


China Yangtze Power Co., Ltd.		ISIN CNE000001G87
	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, 15.5: Protect and prevent the extinction of threatened species	QUARTER Q3 2021


THEME Environment: Depletion of biodiversity		LOCATION China
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced

Elsewedy Electric Co.		ISIN EGS3G0Z1C014
	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 Q2 2021
THEME Environment: Environmental impacts		LOCATION Tanzania
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced


Google LLC		ISIN US38259PAA03
	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 Labour rights: Safe and Healthy Working Conditions		LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed
THEME Corruption: Anti-competitive behavior		LOCATION Several Countries
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES N/A
	TERMINATION OF PRACTICE	REMEDIAL ACTION

	Commitment expressed	Measures initiated
THEME	Human rights: Consumer privacy	LOCATION France
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated


Petroleo Brasileiro SA		ISIN BRPETRACNOR9
	<p>SDG ALIGNMENT</p> <p>SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes</p> <p>SDG 14: Life Below Water; 14.2: Sustainably manage and protect marine and coastal ecosystems,</p> <p>SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping, and minimizing release of hazardous chemicals and materials</p>	QUARTER Q4 2021
THEME	Environment: Environmental impacts	LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated


POSCO		ISIN US6934831099
	<p>SDG ALIGNMENT</p> <p>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</p> <p>SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers</p> <p>SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage</p> <p>SDG 16: Peace, justice, and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory, and representative decision-making at all levels</p> <p>SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages</p>	QUARTER Q3 2021


THEME Human rights: Indigenous rights		LOCATION Indonesia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION No measures announced
THEME Environment: Depletion of Biodiversity		LOCATION Indonesia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Credible measures adopted	REMEDIAL ACTION Measures initiated
THEME Labour rights: Union rights		LOCATION Turkey
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed
THEME Labour rights: Safe and Healthy Working Conditions		LOCATION South Korea
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed


POSCO INTERNATIONAL Corp.		ISIN KR7047050000
	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
	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	
THEME Human rights: Indigenous rights		LOCATION Indonesia
DISCLOSURE		IMPLEMENTATION OF POLICIES


GOALS SET & MILESTONES ACHIEVED	Commitment expressed	Commitment expressed
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION No measures announced
THEME Environment: Depletion of Biodiversity		LOCATION Indonesia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Credible measures adopted
	TERMINATION OF PRACTICE Credible measures adopted	REMEDIAL ACTION Measures initiated

Ratch Group Public Co. Ltd.		ISIN TH0637010008
	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	QUARTER Q4 2021
THEME Human rights: Indigenous rights		LOCATION Laos
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated


SAP SE		ISIN DE0007164600
	SDG ALIGNMENT SDG 16: Peace, justice, and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q4 2021
THEME Corruption: Bribery		LOCATION South Africa
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES N/A
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A


Securitas AB		ISIN XS0422689843
	SDG ALIGNMENT SDG 16: Peace, justice, and Strong Institutions; 16.1: Reduce all forms of violence and related death rates everywhere	QUARTER Q4 2021
THEME Human rights: Human rights due diligence		LOCATION Switzerland
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

Sercu Group Plc		ISIN GB0007973794
	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 2021
THEME Human rights: Human rights due diligence		LOCATION Australia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced

Shell Plc		ISIN GB00B03MM408
	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 10: Reduced Inequalities; 10.1: Achieve and sustain income growth SDG 8: Decent Work and Economic Growth; 8.5: Achieve full and productive employment and decent work for all women and men, 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q4 2021
THEME		LOCATION


Environment: Environmental impact		Nigeria
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated
THEME Labour rights: Safe and Healthy Working Conditions		LOCATION Nigeria
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated

SIPEF SA/NV		ISIN BE0003898187
	SDG ALIGNMENT SDG 10: Reduced Inequalities; 10.1: Achieve and sustain income growth SDG 8: Decent Work and Economic Growth; 8.5: Achieve full and productive employment and decent work for all women and men, 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q3 2021
THEME Labour rights: Safe and Healthy Working Conditions		LOCATION Indonesia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced

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	QUARTER Q4 2021
THEME Human rights: Indigenous rights		LOCATION Laos
DISCLOSURE No measures announced		IMPLEMENTATION OF POLICIES No measures announced

GOALS SET & MILESTONES ACHIEVED	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced
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SNC-Lavalin Group Inc.	ISIN CA78460T1057
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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 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q1 2021
	SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage	
	SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands	


THEME Environment: Environmental impacts	LOCATION Canada
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GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced

THEME Human Rights: Indigenous Rights	LOCATION Canada
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GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced


Sociedad Quimica y Minera de Chile SA	ISIN USP8718AAC01
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	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	QUARTER Q1 2021
	SDG 6: Clean Water and Sanitation; 6.1: Universal and equitable access to safe and affordable drinking water	


THEME Environment: Environmental impacts	LOCATION Chile
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DISCLOSURE	IMPLEMENTATION OF POLICIES
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GOALS SET & MILESTONES ACHIEVED	Measures initiated	Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated
THEME Human rights: Indigenous rights		LOCATION Chile
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed

Swedbank AB		ISIN SE0001877739
	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 Q4 2021
THEME Corruption: Money laundering		LOCATION Several countries
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated

Top Glove Corp. Bhd.		ISIN MYL711300003
	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 Q2 2021
THEME Labour Rights: Forced labour		LOCATION Malaysia
ASSESSMENT OF ENGAGEMENT TARGETS	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

Transneft PJSC		ISIN RU0009091573
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q4 2021
	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	
THEME Environment: Environmental impacts		LOCATION Russia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced

Vale SA		ISIN US91912E1055
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q2 2021
	SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping, and minimizing release of hazardous chemicals and materials	
THEME Environment: Environmental impacts		LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Credible measures adopted
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

RESPONSIVENESS TO Q4 2021 ENGAGEMENT LETTERS

The following table provides an overview of the responsiveness to the engagement initiated in this quarter, as per 31 December 2021. Companies that had yet to respond to the initial engagement letters were sent reminder notifications on 2 February 2022. Continued non-response to the reminders will lead to escalation of engagement attempts to the CEO and then the Board level as described under the section, “Engagement Cycle,” earlier in this document.

ISSUER	ISIN	ESG AREA BREAKDOWN	RESPONSE RECEIVED
Ackermans & van Haaren NV	BE0003764785	Corruption	No
Almirall SA	ES0157097017	Corruption	No
Aziyo Biologics, Inc.	US05479K1060	Human rights	No
Banglalink Digital Communications Ltd.	US059897AA67	Labour rights	No
BASF SE	DE000BASF111	Environment	Yes
BLD Plantation Bhd.	MYL506900009	Environment	No
Cargill, Inc.	USU141781042	Environment	Yes
China National Petroleum Corp.	CND100002XJ6	Environment	No
Coal India Ltd.	INE522F01014	Overlapping: Labour rights/Environment	No
Gazprom Neft PJSC	RU0009062467	Environment	No
NLC India Ltd.	INE589A01014	Labour rights	No
Petroleo Brasileiro SA	BRPETRACNPR6	Environment	Yes
Petroleos Mexicanos SA	US71654QDD16	Overlapping: Labour rights/Environment	No
Power Construction Corporation of China, Ltd	CNE1000017G1	Environment	No
Ratch Group Public Co. Ltd.	TH0637010Y00	Human rights	Yes
Royal Dutch Shell Plc	GB00B03MLX29	Environment	Yes
SAP SE	DE0007164600	Corruption	Yes
Securitas AB	SE0000163594	Human rights	Yes
SK Inc.	KR7034730002	Human rights	Yes
Swedbank AB	SE0000242455	Corruption	Yes
Telefonaktiebolaget LM Ericsson	SE0000108656	Corruption	No

TENMA Corp.	JP3547800007	Corruption	No
The Kansai Electric Power Co., Inc.	JP3228600007	Corruption	No
Transneft PJSC	RU0009091573	Environment	Yes
VEON Holdings BV	US92718WAB54	Labour rights	No
VEON Ltd.	BMG9349W1038	Labour rights	No

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