



POOLED ENGAGEMENT +

Q2 2021 Progress Report

(for the period of 1 April 2021 to 30 June 2021)

30 July 2021



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EXECUTIVE SUMMARY

The Pooled Engagement Quarterly Report for Q2 2021 consists of two parts. The first part provides a description of ISS ESG's Pooled Engagement service, 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 second part of the report presents the progress of engagement activities that were carried out on behalf of institutional investors in Q2 2021. This second part includes numerical and statistical summaries of companies engaged with and an overview and summary of responses received on letters sent out in Q2 2021.





The detailed engagement summaries for the individual companies listed in the report, and their responses, are available via ISS ESG's online reporting platform [Pooled Engagement Tool](#).

THE POOLED ENGAGEMENT PROCESS

ISS ESG’s Pooled Engagement service focuses on companies that are assessed under Norm-Based Research service 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 Pooled Engagement process is assessed by ISS’ Research Analysts and the Stewardship & Engagement Team against the objectives established at the outset of engagement and a decision is then taken on the outcome of the engagement. When 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.

The engagements are categorized under the four UN Global Compact areas: Human Rights; Labour Rights; Environment and Anti-Corruption. Throughout this document, these areas are depicted by the symbols shown in the table below:

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

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 Pooled 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.

For companies that do not provide an initial response, reminders are submitted to the Investor Relations Department. Should the reminders fail to elicit a response, the enquiries are escalated to the attention of the CEO and, ultimately, to the attention of the Board Chairperson within a 12-month period, as indicated in the below image:



More details on the responsiveness of companies to the engagements initiated in Q2 2021 are provided in the "Responsiveness to Q2 2021 engagement letters" section, which begins on page 17 of this report.

ENGAGEMENT STATISTICS FOR Q2 2021

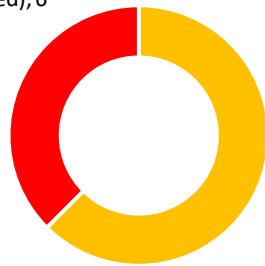
In Q2 2021 under ISS' Pooled Engagement service, engagement was initiated with 16 companies, covering 24 individual ESG topics.

Of these 16 companies, six were Red-flagged and the others Amber-flagged, according to ISS ESG's Norm-Based Research methodology. Seven of the 16 companies replied to investor enquiries by 30 June 2021. This constitutes an overall response rate of 44 percent.

To assist investors with their reporting, the statistics presented below are based on the companies with which engagement was initiated in Q2 2021.

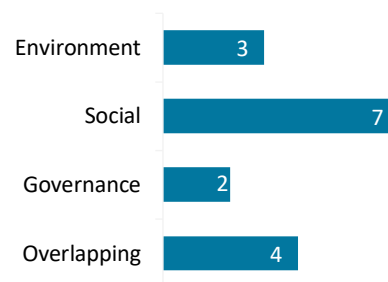
Verified or Alleged Failure to Respect Established Norms

Verified Norm Violation
(Red-flagged), 6



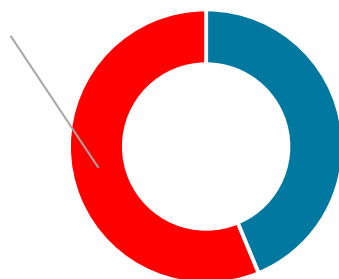
Alleged Norm Violation
(Amber-flagged), 10

ESG Area Breakdown



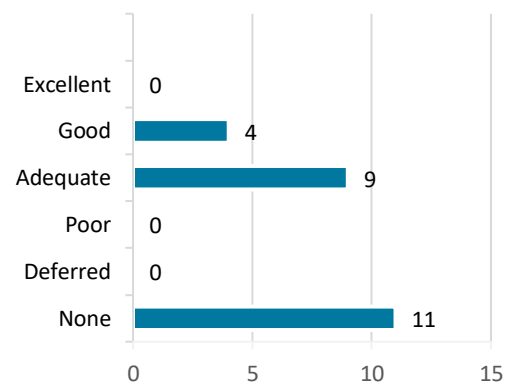
Response Rate

Response Not
Received, 9



Response
Received, 7

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 Q2 2021

Bayer AG		ISIN DE000BAY00177
THEME Environment: Depletion of biodiversity	LOCATION Several countries	
ACTIVITY SUMMARY	<p>In Q4 2018, investors, facilitated by ISS ESG, shared a letter with German multinational pharmaceutical and life sciences company, Bayer AG regarding its failure to prevent depletion of biodiversity in several countries. The European Food Safety Authority (EFSA) found that the outdoor use of two of the neonicotinoid pesticides that Bayer produces and markets internationally, carry significant risks to bees and other critical pollinators, which led the European Union to ban their outdoor use in late 2018.</p> <p>In a web meeting with ISS ESG and investors scheduled in Q2 2021, Bayer explained its activities to mitigate the risk to bees from exposure to neonicotinoids from both seed treatment and spray application. These measures include the co-development of a standardized method of measuring dust, significant improvements with seed coatings, and ongoing label revisions and use reductions. Such technological developments have reduced dust emissions by up to 95%. Bayer, following its new sustainability strategy of restoring biodiversity, is also working with the Technical University of Denmark to develop a methodology to ascertain the environmental impact of its own products and those across the industry. Bayer concluded that its mitigation activities are effective as no further bee deaths due to release of dust from treated seeds have been detected. Bayer said a comprehensive incident reporting system is in place, where harmful pesticide-pollinator interactions are documented and investigated. It is also focusing both on existing product stewardship and developing new products with already 15 new products launched and 12 existing products taken off the market.</p> <p>Bayer shared a slide, that shows that the company’s crop protection products have an 18% market share and a 2% environmental impact share. The company aims to further reduce the environmental impact of its crop protection portfolio by 30% by 2030. Based on this information, ISS ESG determined that Bayer has progressed in all key aspects of the engagement targets set for this case. However, additional questions have been raised on neonicotinoids and crop protection, its Dicamba and Glyphosate litigations, and its progress towards committed decarbonization.</p>	

<p>Capital One Financial Corporation</p>	<p>ISIN US14040H1059 (Plc) US14042RBT77 (Capital One, NA) US140420NB24 (Capital One Bank (USA), NA)</p>
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<p>THEME Human rights: Consumers' right to privacy</p>	<p>LOCATION United States and Canada</p>
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<p>ACTIVITY SUMMARY</p>	<p>During the Q1 2021 Pooled Engagement cycle, investors sent a letter to American bank holding company Capital One Financial Corporation, and its subsidiaries Capital One, NA and Capital One Bank (USA) NA, regarding its failure to respect consumers' right to privacy in the United States and Canada following a cybersecurity incident. In August 2020, the United States (U.S.) Office of the Comptroller of the Currency (OCC) imposed an \$80 million fine on the two wholly owned subsidiaries of Capital One Financial Corp. (collectively Capital One), for a major data breach which affected approximately 100 million individuals in the U.S. and 6 million customers in Canada. The investigation of the Office of the Privacy Commissioner (OPC) on the breach is ongoing.</p> <p>In Q2 2021, Capital One took part in a web meeting with ISS ESG and investors. During this conversation, the company detailed the concrete steps taken to address the core issues highlighted by the OCC, including the company's internal audit failure to identify cybersecurity weaknesses and the Board's failure to take effective actions to hold senior management accountable. Capital One took specific actions to strengthen its governance, controls, and compliance processes. The company quickly determined the scope of the breach and confirmed no further data distribution by the perpetrator. The Board of Directors is now involved in overseeing the root cause analysis of the incidents to get a comprehensive understanding of the adequacy of control measures in place through their own independent review. Capital One invested in technology to migrate many of the company's internal systems to the cloud and added three new directors and two new executives with technology industry background to strengthen the governance structure and further ensure the company's IT systems' resilience against cyber threats.</p> <p>ISS ESG observed that Capital One is focused on establishing quality and sustainable control systems to remain one step ahead of the ever-evolving cyber threat space. It is working towards completing the requirements of the OCC's enforcement order and will disclose about its completion once the OCC lifts the consent orders. Hence, these engagements were suspended pending developments, namely the fulfilment of the OCC's enforcement order, which may be fully resolved and approved within a year, and the final report from OPC.</p>
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Iberdrola SA		ISIN ES0144580Y14
THEME Human rights: Indigenous rights, Environment: Depletion of biodiversity		LOCATION Brazil
ACTIVITY SUMMARY	<p>In Q2 2021, ISS ESG, on behalf of investors, shared a letter with Iberdrola SA regarding allegations claiming that since 2009, the company’s subsidiary, Neoenergia SA, which holds a 10% stake in Norte Energia SA, operating the 11,233 MW Belo Monte hydropower plant on the Xingu River in Brazil, has failed to adequately consult indigenous communities, mitigate impacts on their standard of living and prevent significant impacts to the river’s biodiversity. According to the Brazilian Federal Prosecutor's Office (MPF), the diversion of water to power the dam’s turbines has caused a reduction of the river’s flow and could have potential irreversible impacts on the river’s ecosystem. As a result, in August 2019, the MPF recommended that the Brazilian Institute of Environment and Renewable Natural Resources (IBAMA) suspend and revise the project’s environmental license.</p> <p>Iberdrola SA has provided a written response to the investor letter and expressed a willingness to take part in a web dialogue. In the detailed response, the company provided an overview of the numerous programs being implemented by Norte Energia, such as the signing of the Termo de Compromisso Ambiental (TCA). The TCA is a 36-month commitment between the IBAMA and Norte Energia which covers 14 projects (314 actions) divided into 6 areas of action (Biodiversity, Monitoring of Ichthyofauna, Social, Health, Communication and Sanitation System). Additionally, the company created a Sustainability Committee and implemented an Advisory Council to facilitate the integration of ESG aspects on Norte Energia’s businesses.</p> <p>ISS ESG has suspended this engagement pending further developments, while the Norte Energia is taking additional mitigation measures to compensate for the impacts of the water flow reduction on the biodiversity of the Xingu River, as committed in February 2021.</p>	



<p>Top Glove Corp. Bhd.</p>		<p>ISIN MYL711300003</p>
<p>THEME Labour rights: Forced labour</p>	<p>LOCATION Malaysia</p>	
<p>ACTIVITY SUMMARY</p>	<p>During the Q2 2021 Pooled Engagement cycle, investors sent a letter to Malaysian rubber glove manufacturer company Top Glove Corp. Bhd. regarding the repeated allegations of subjecting its workforce to extreme working conditions and failure to prevent forced labour at its rubber glove manufacturing facilities in Malaysia. According to most recent report by United Kingdom’s (U.K.) Channel 4 in June 2020 and by the Los Angeles Times in September 2020, the unprecedented demand for disposable gloves during the COVID-19 pandemic has resulted in inadequate working conditions for Top Glove’s primarily migrant workers. The investor letter sought information on actions the company is taking to strengthen its governance, controls, and compliance processes.</p> <p>In Q2 2021, Top Glove Corp. Bhd. took part in a web meeting with ISS ESG and investors. During this conversation, the company showed a willingness to address the allegations and mentioned that they have engaged an independent auditor, ‘Impactt’, in July 2020, to investigate the allegations of forced labour. The auditor concluded in the report that the systemic forced labour is no longer present among the company’s direct workers. Top Glove subsequently submitted an independent audit report based on virtual interviews with over 1,000 of its workers to the United States’ Customs and Border Protection (CBP) and committed to remediating RM136 million (\$32 million) in previously paid recruitment fees to migrant workers.</p> <p>In addition to the independent audit report, the company has also put in place a corrective action plan which includes employee grievance channels and a centralized internal workers’ helpline, improved employee accommodation to comply with government standards, improvements to Recruitment Agreement and Recruitment Terms, and an enhanced harassment policy. Furthermore, the company stated that it will conduct ‘Quarterly independent audits’, which will include interviews with workers. On the basis of such information, ISS ESG determined that Top Glove had credibly implemented relevant policies, initiated measures regarding the disclosure of additional relevant information and implemented remedial actions.</p>	

SUMMARY OF ENGAGEMENT RESPONSES RECEIVED IN Q2 2021


The following pages list dialogues that occurred during Q2 2021 for engagements that commenced in Q2 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.


Centrais Elétricas Brasileiras SA (Electrobras)		ISIN BRELETACNPB7
	<p>SDG ALIGNMENT</p> <p>SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage</p> <p>SDG 15: Life on Land; 15.1: Ensure the conservation and sustainable use of terrestrial and inland freshwater ecosystems, in particular forests, wetlands, mountains and drylands</p> <p>SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species services, in particular forests, wetlands, mountains and drylands</p> <p>SDG 16: Peace, justice, and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms</p> <p>SDG 16: Peace, justice, and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory, and representative decision-making at all levels</p>	
	<p>QUARTER Q2 2021</p>	
	<p>THEME Human Rights: Indigenous rights</p>	<p>LOCATION Brazil</p>
	<p>GOALS SET & MILESTONES ACHIEVED</p>	<p>DISCLOSURE Commitment expressed</p> <p>IMPLEMENTATION OF POLICIES No measures announced</p>
	<p>TERMINATION OF PRACTICE Measures initiated</p>	<p>REMEDIAL ACTION Measures initiated</p>
<p>THEME Environment: Depletion of biodiversity</p>		<p>LOCATION Brazil</p>
<p>GOALS SET & MILESTONES ACHIEVED</p>	<p>DISCLOSURE Commitment expressed</p> <p>IMPLEMENTATION OF POLICIES No measures announced</p>	
<p>TERMINATION OF PRACTICE Measures initiated</p>	<p>REMEDIAL ACTION Measures initiated</p>	
<p>THEME Anti-Corruption: Bribery</p>		<p>LOCATION Brazil</p>
<p>GOALS SET & MILESTONES ACHIEVED</p>	<p>DISCLOSURE No measures announced</p> <p>IMPLEMENTATION OF POLICIES N/A</p>	
<p>TERMINATION OF PRACTICE N/A</p>	<p>REMEDIAL ACTION No measures announced</p>	

Golden Agri-Resources Ltd.		ISIN MU0117U00026
	<p>SDG ALIGNMENT 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>	QUARTER Q2 2021
THEME Human Rights: Indigenous rights		LOCATION Indonesia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated
THEME Human rights: Indigenous rights		LOCATION Liberia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated

Iberdrola SA		ISIN ES0144580Y14
 	<p>SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage</p> <p>SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands</p> <p>SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species</p> <p>SDG 16: Peace, justice, and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels</p>	QUARTER Q2 2021
THEME Human rights: Indigenous rights		LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

THEME Environment: Depletion of biodiversity		LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

PT Astra Agro Lestari Tbk		ISIN ID1000066004
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.3: Inclusive and sustainable urbanization SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage SDG 16: Peace, justice, and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q2 2021
THEME Human rights: Indigenous rights		LOCATION Indonesia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Commitment expressed

QUALCOMM Incorporated		ISIN US7475251036
	SDG ALIGNMENT N/A	QUARTER Q2 2021
THEME Anti-Corruption: Anti-competitive behaviour		LOCATION Several countries
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Credible measures adopted
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A

Top Glove Corp. Bhd.		ISIN MYL711300003
	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 2021
THEME Labour rights: Forced labour		LOCATION Malaysia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

Vale SA		ISIN BRVALEACNORO
	SDG ALIGNMENT SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages 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 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 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q2 2021
THEME Environment: Water pollution		LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Commitment expressed
THEME Human rights: Indigenous rights		LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE	REMEDIAL ACTION

	Measures initiated	Measures initiated
THEME Labour rights: Safe and healthy working conditions		LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated

Capital One Financial Corporation		ISIN US14040H1059
	SDG ALIGNMENT N/A	QUARTER Q1 2021
THEME Human rights: Consumers' right to privacy		LOCATION Canada
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated
THEME Human rights: Consumers' right to privacy		LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

Capital One, NA		ISIN US14042RBT77
	SDG ALIGNMENT N/A	QUARTER Q1 2021
THEME Human rights: Consumers' right to privacy		LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

Capital One Bank (USA), NA		ISIN US140420NB24
	SDG ALIGNMENT N/A	QUARTER Q1 2021
THEME Human rights: Consumers' right to privacy		LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

Bayer AG		ISIN DE000BAY0017
	SDG ALIGNMENT SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species	QUARTER Q4 2018
THEME Environment: Depletion of biodiversity		LOCATION Several countries
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

RESPONSIVENESS TO Q2 2021 ENGAGEMENT LETTERS

The following table summarizes the responsiveness during Q2 2021 to the engagement enquiries initiated in this quarter. Companies that did not respond to the initial engagement letters were sent reminder notifications by email to the Investor Relations contacts. 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. **The below responses are as of 30 June 2021.**

ISSUER	ISIN	ESG AREA BREAKDOWN	RESPONSE RECEIVED
ALROSA PJSC	RU0007252813	Environment	No
Centrais Elétricas Brasileiras SA	BRELETACNPB7	Overlapping (Corruption, Environment, Human Rights)	Yes
China National Chemical Corp.	CND10001QCH4	Environment	No
Companhia Energética de Minas Gerais SA	BRCMIGACNPR3	Overlapping (Human Rights, Environment)	No
Elsewedy Electric Co.	EGS3G0Z1C014	Environment	No
FirstEnergy Corp.	US3379321074	Corruption	Yes
Golden Agri-Resources Ltd.	MU0117U00026	Human Rights	Yes
Iberdrola SA	ES0144580Y14	Overlapping (Human Rights, Environment)	Yes
Jardine Cycle & Carriage Ltd.	SG1B51001017	Human Rights	No
Jardine Matheson Holdings Ltd.	BMG507361001	Human Rights	No
Jardine Strategic Holdings Ltd.	BMG507641022	Human Rights	No
PT Astra Agro Lestari Tbk	ID1000066004	Human Rights	Yes
PT Astra International Tbk	ID1000122807	Human Rights	No
QUALCOMM Incorporated	US7475251036	Corruption	Yes
Top Glove Corp. Bhd.	MYL711300003	Labour Rights	Yes
Vale SA	BRVALEACNOR0	Overlapping (Environment, Human Rights, Labour Rights)	Yes

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