



ISS ESG

**COLLABORATIVE
ENGAGEMENT**



N O R M - B A S E D E N G A G E M E N T



Q2 2022 Progress Report

(For the period of 1 April 2022 to 30 June 2022)

July 2022



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INTRODUCTION

The Norm-Based Engagement Quarterly Report for Q2 2022 consists of five parts. The first part provides a description of ISS ESG's Norm-Based Engagement Solution, which is conducted on behalf of investors with companies that have been assessed under ISS ESG's Norm-Based Research to be facing alleged or verified severe, systematic, or systemic failures to respect international norms and guidelines on responsible business conduct.

The latter sections of the report provide details of progress of engagement activities that were carried out on behalf of institutional investors in Q2 2022:

- The second part of the report presents summary statistics of engagements initiated in Q2 2022.
- The third part highlights notable engagements carried out in Q2 2022.
- The fourth part provides summaries of engagement responses received in Q2 2022.
- The fifth part provides an overview of responsiveness to letters sent out in Q2 2022, as of 30 June 2022.

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

ISS ESG NORM-BASED ENGAGEMENT APPROACH

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

INITIATING ENGAGEMENT

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

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

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

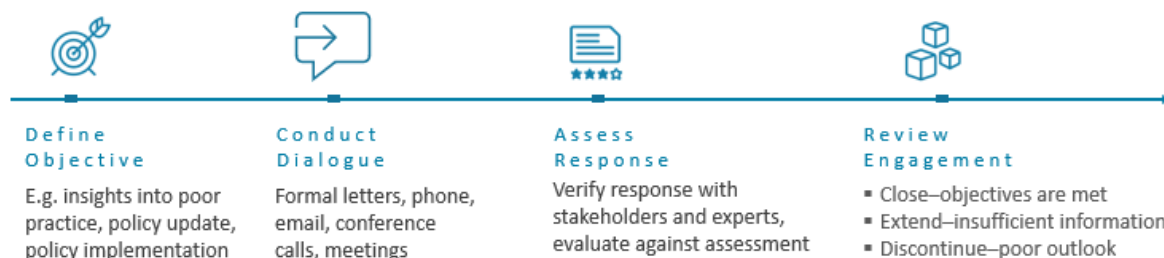


Figure 1: Simplified Norm-Based Engagement process.

CONDUCTING EFFECTIVE ENGAGEMENT DIALOGUE

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

ELICITING RESPONSES FROM NON-RESPONSIVE COMPANIES

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

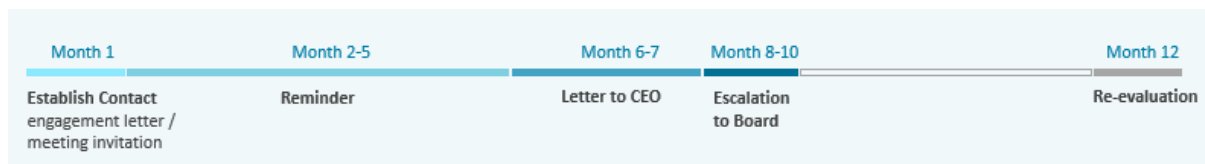






Figure 2: Simplified Norm-Based Engagement timeline.

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

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

STATISTICS FOR ENGAGEMENT INITIATED IN Q2 2022

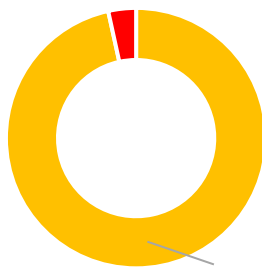
In Q2 2022, ISS ESG initiated Norm-Based Engagement on behalf of investors with 29 companies, covering 31 individual ESG topics.

Of these 29 companies, one was Red flagged and the remainder Amber flagged, according to ISS ESG’s Norm-Based Research methodology. By 30 June 2022, ISS ESG had received responses from 15 of the 29 companies to which investor enquiries had been sent on 15 April 2022. This constitutes an overall response rate of 52 percent.

To assist investors with their reporting, the statistics presented below are based on the companies with which engagement was initiated in Q2 2022.

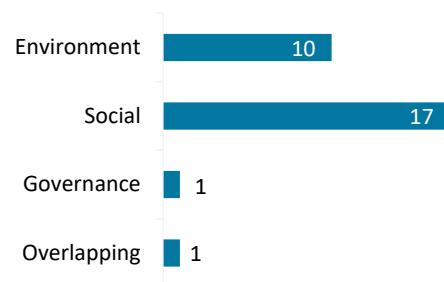
Verified or Alleged Failure to Respect Established Norms

Verified Norm Violation
(Red-flagged), 1



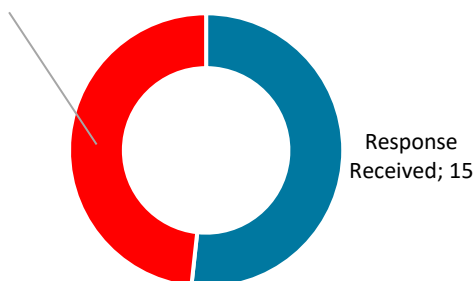
Alleged Norm Violation
(Amber-flagged), 28

ESG Area Breakdown

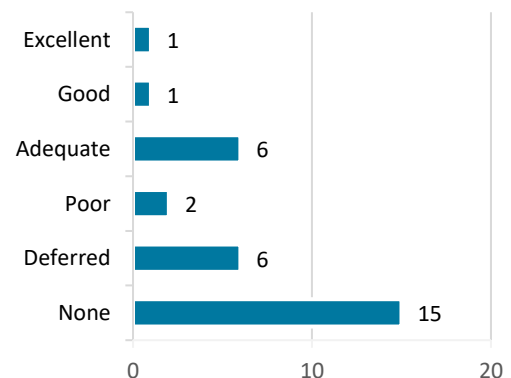


Response Rate

Response Not
Received; 14



Quality of Participation



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

NOTABLE ENGAGEMENT ACTIVITY IN Q2 2022


The cases below are examples of notable Norm-Based Engagement activity carried out on behalf of investors in Q2 2022.


PT Pertamina (Persero)		ISIN US69369EAB56
THEME	LOCATION	
Environment - Oil spill, Pollution	Indonesia	
ACTIVITY SUMMARY	<p>In Q2 2022, the pool of investors shared a letter with PT Pertamina (Persero) regarding the company's alleged failure to prevent pollution in Indonesia.</p> <p>In June 2022, Pertamina provided a detailed written response to the investor enquiry stating that the company carried out environmental management by adopting best practices per Pertamina's Sustainability Expectations for Health, Safety, Security, and Environment (HSSE) Management. The company aims to strengthen emergency and oil spill response preparedness across all of its sites by implementing a complete 'Process Safety Asset Integrity Management' cycle to prevent major accidents. The Ministry of Environment and Forestry (the Ministry) confirmed that the recovery of waste and environmental remediation of the oil spill at the site of the YYA-1 well at the Offshore Northwest Java block was completed. Pertamina, along with the Center for Environmental Research, Bogor Agricultural IPB University, conducted a study on ecosystems and biota in the affected areas. The Ministry verified the results of this study, concluding that ecosystems and biota are not affected by the oil spill, except for the Rhizoporace species of Mangrove.</p> <p>ISS ESG notes the disclosure of information on the completion of remediation of the impact of the YYA-1 well spill and information on the recorded oil spill and Pertamina's actions in recent years concerning strengthening its environmental management practices. Additionally, ISS ESG appreciates the company's disclosure in its sustainability reporting stating that incidents of oil spills at the company's facilities have decreased, and no incident in 2021 generated more than 15 barrels of oil.</p> <p>ISS ESG will continue to monitor the efficacy of mitigation measures at the company's offshore and onshore operations to reduce severe oil spills.</p>	


Petroleos Del Peru - Petroperu SA		ISIN PEP496001202
THEME Environment - Soil pollution and Water pollution	LOCATION Peru	
ACTIVITY SUMMARY	<p>In Q2 2022, the pool of investors shared a letter with Petroleos Del Peru – Petroperu SA (Petroperu) regarding the company's alleged failure to prevent and remediate soil and water pollution at the North Peruano Pipeline in Peru.</p> <p>In June 2022, Petroperu provided a detailed written response to the investor enquiry, providing an update on the status of remediation of outstanding incidents of oil spills, clarifying that out of all the spills that occurred between 2014 and 2021 in the Norperuano Oil Pipeline (ONP), only three events (that occurred along Km 193, Km 237 and Km 373 of the pipeline) have pending remediation works. Furthermore, Petroperu also highlighted its policies and systems which aim to prevent and mitigate the risk of third-party interference; its Right of Way of the ONP, Early Warning System, Gap Closure Plan and ONP SCADA System to reduce the response time in case of emergency at the ONP.</p> <p>Concerning the status of the Agency of Environmental Assessment and Supervision investigations (OEFA), Petroperu mentioned that its dispute with the OEFA revolves around sediment intervention evaluation, an environmental component that does not have an Environmental Quality Standard that allows for defining an objective level of remediation verifiable by authorities. Petroperu has complied with carrying out the remediation of those sediments and as ordered by the Environmental Enforcement Court, prepared and executed a Rehabilitation Plan.</p> <p>ISS ESG is encouraged by Petroperu’s mitigation action for spills that occur along the pipeline regardless of cause. Similarly, the company shared its strategies and mitigation measures in place to prevent the recurrence of oil spill incidents. However, to adequately address investor enquiries and the concerns raised by stakeholders over the recurrence of oil spills, the company should provide any supporting third-party documentation that would verify the efficacy of remediation steps implemented.</p> <p>ISS ESG will pursue further engagement to inquire about third-party documentation of the efficacy of the company’s environmental safety and remediation measures.</p>	


SUMMARY OF ENGAGEMENTS CONDUCTED IN Q2 2022


The following pages list engagement dialogues that occurred during Q2 2022 for engagements that commenced in Q2 2022 or earlier. These tables present the progress achieved against the goals 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.

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


ArcelorMittal SA		ISIN LU1598757687
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q1 2021
THEME Environment: Air pollution		LOCATION Kazakhstan
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated
THEME Environment: Air pollution		LOCATION France
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated


Aziyo Biologics, Inc.		ISIN US05479K1060
	SDG ALIGNMENT SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages	QUARTER Q4 2021
THEME Human rights: Consumer health and safety		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES N/A
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated

Bharat Heavy Electricals Limited		ISIN INE257A01026
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q1 2022
THEME Environment: Environmental impacts		LOCATION Bangladesh
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Measures initiated

BHP Group Limited		ISIN AU000000BHP4
	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 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
THEME Environment: Environmental Impacts		LOCATION Brazil
	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Credible measures adopted


GOALS SET & PROGRESS ACHIEVED	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated
THEME Environment: Environmental impacts		LOCATION Chile
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Credible measures adopted
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

Biora Therapeutics, Inc. (Progenity, Inc.)		ISIN US74319F1075
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q1 2022
THEME Corruption: Bribery		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated


Companhia Energetica de Minas Gerais SA		ISIN BRCMIGACNPR3
	SDG ALIGNMENT SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services 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 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: Depletion of biodiversity		LOCATION Brazil
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE	REMEDIAL ACTION

	Measures initiated	Measures initiated
THEME	Human Rights: Indigenous rights	
		LOCATION Brazil
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated


Freeport-McMoRan, Inc.		ISIN US35671D8570
	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	QUARTER Q1 2022
	SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	
	SDG 16: Peace, justice and Strong Institutions; 16.1: Reduce all forms of violence and related death rates everywhere	
THEME	Environment: Water Pollution	
		LOCATION Indonesia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated
THEME	Human rights: Human rights due diligence	
		LOCATION Indonesia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

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	


Corruption: Money laundering		Spain
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A


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 Corruption: Money laundering		LOCATION Spain
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A

Motherson Sumi Systems Limited		ISIN INE775A01035
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q2 2022
THEME Labour rights: Union rights		LOCATION Mexico
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated


Petroleos Del Peru - Petroperu SA		ISIN PEP496001202
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes,	QUARTER Q1 2022


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		
THEME Environment: Pollution		LOCATION Peru
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated


PT Pertamina (Persero)		ISIN US69369EAB56
	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 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 Q2 2022
THEME Environment: Pollution		LOCATION Indonesia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Credible measures adopted
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Credible measures adopted

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
THEME Labour rights: Forced labour		LOCATION China
	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES

GOALS SET & PROGRESS ACHIEVED		Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced

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
THEME Environment: Environmental impacts		LOCATION Several countries
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated


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
THEME Environment: Environmental impacts		LOCATION Canada
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

Target Corporation		ISIN US87612E1064
	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		
THEME Labour Rights: Forced labour	LOCATION China	
GOALS SET & PROGRESS ACHIEVED	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
THEME Corruption: Bribery	LOCATION China	
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A
THEME Corruption: Bribery	LOCATION Indonesia	
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES N/A
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated
THEME Corruption: Bribery	LOCATION Saudi Arabia	
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES N/A
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated
THEME Corruption: Bribery	LOCATION Vietnam	
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES N/A


GOALS SET & PROGRESS ACHIEVED	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated
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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
THEME Corruption: Bribery		LOCATION Vietnam
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated

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

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
THEME		LOCATION

Environment: Pollution		Japan
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	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
THEME Labour rights: Forced labour		LOCATION China
GOALS SET & PROGRESS ACHIEVED	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 Q2 2022
THEME Labour rights: Union rights		LOCATION Bangladesh
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Commitment expressed

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

RESPONSIVENESS TO Q2 2022 ENGAGEMENT LETTERS

The following table provides an overview of the responsiveness to the engagement initiated in this quarter, as of 30 June 2022. Companies that had yet to respond to the initial engagement letters were sent reminder notifications on 4 July 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
Adani Enterprises Limited	INE423A01024	Environment, Human rights	No
Adani Ports & Special Economic Zone Ltd.	INE742F01042	Human rights	Yes
AES Andes SA	CL0002694637	Human rights	Yes
Bayer AG	DE000BAY0017	Environment	Yes
Carrefour SA	FR0000120172	Labour rights	No
China Molybdenum Co., Ltd.	CNE100000114	Labour rights	No
CNOOC Limited	HK0883013259	Environment	No
FAST RETAILING CO., LTD.	JP3802300008	Labour rights	No
FCA US LLC	US17121HAA86	Environment	No
HUGO BOSS AG	DE000A1PHFF7	Labour rights	Yes
HYUNDAI ENGINEERING & CONSTRUCTION CO., LTD.	KR7000720003	Corruption	No
Kohls Corporation	US5002551043	Labour Rights	No
Korian SA	FR0010386334	Human rights	No
Levi Strauss & Co.	US52736R1023	Labour Rights	No
Macy's, Inc.	US55616P1049	Labour Rights	No
Motherson Sumi Systems Limited	INE775A01035	Labour rights	Yes
Petroleos Del Peru - Petroperu SA	PEP496001202	Environment	Yes
PT Pertamina (Persero)	US69369EAB56	Environment	Yes
PVH Corp.	US6936561009	Labour rights	Yes
Stellantis NV	NL00150001Q9	Environment	No
Sumitomo Chemical Co., Ltd.	JP3401400001	Environment	Yes

Suncor Energy Inc.	CA8672241079	Environment	Yes
Target Corporation	US87612E1064	Labour rights	Yes
The AES Corporation	US00130H1059	Human rights	Yes
Tokyo Electric Power Co. Holdings, Inc.	JP3585800000	Environment	Yes
Tongling Nonferrous Metals Group Co., Ltd.	CNE000000529	Environment	No
Urban Outfitters, Inc.	US9170471026	Labour rights	Yes
Walmart Inc.	US9311421039	Labour rights	Yes

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