



ISS ESG

**COLLABORATIVE
ENGAGEMENT**



NORM-BASED ENGAGEMENT



Q1 2022 Progress Report

(For the period of 1 January 2022 to 31 March 2022)

29 April 2022



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INTRODUCTION

The Norm-Based Engagement Quarterly Report for Q1 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 Q1 2022:

- The second part of the report presents summary statistics of engagements initiated in Q1 2022.
- The third part highlights notable engagements carried out in Q1 2022.
- The fourth part provides summaries of engagement responses received in Q1 2022.
- The fifth part provides an overview of responsiveness to letters sent out in Q1 2022, as of 31 March 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](#).

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.

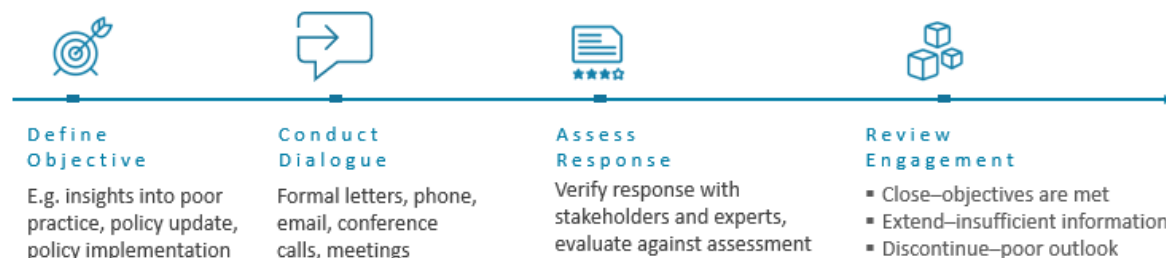


Figure 1: Simplified Norm-Based Engagement process.

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.

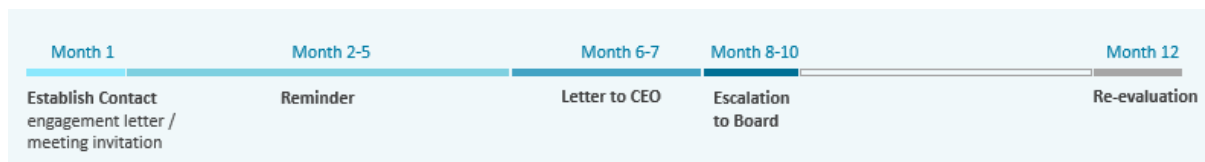


Figure 2: Simplified Norm-Based Engagement timeline.

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 Q1 2022

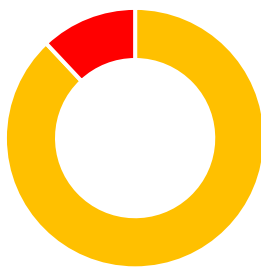
In Q1 2022, ISS ESG initiated Norm-Based Engagement on behalf of investors with 25 companies, covering 25 individual ESG topics.

Of these 25 companies, three were Red flagged and the remainder Amber flagged, according to ISS ESG’s Norm-Based Research methodology. By 31 March 2022, ISS ESG had received responses from 9 of the 25 companies to which investor enquiries had been sent on 15 February 2022. This constitutes an overall response rate of 36 percent.

To assist investors with their reporting, the statistics presented below are based on the companies with which engagement was initiated in Q1 2022.

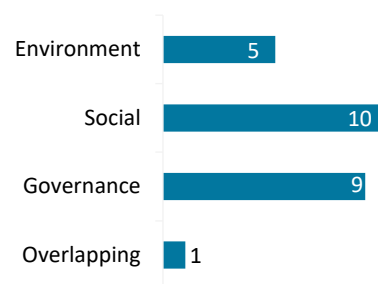
Verified or Alleged Failure to Respect Established Norms

Verified Norm Violation (Red-flagged), 3



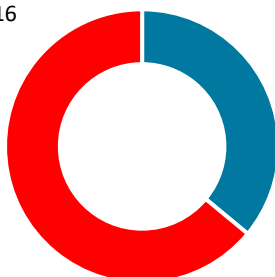
Alleged Norm Violation (Amber-flagged), 22

ESG Area Breakdown



Response Rate

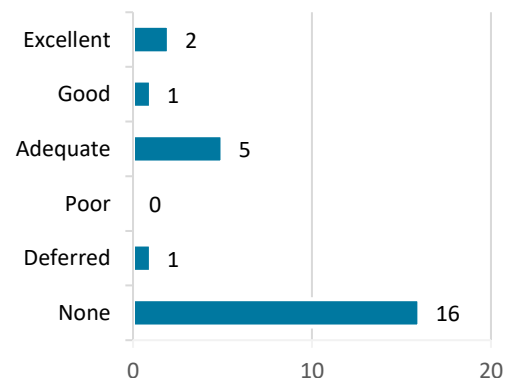
Response Not Received; 16



Response Received; 9

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 Q1 2022

The cases below are examples of notable Norm-Based Engagement activity carried out on behalf of investors in Q1 2022.

Mitsubishi Electric Corp.		ISIN DE0008621392
THEME Union rights	LOCATION Thailand	
ACTIVITY SUMMARY	<p>In Q1 2022, the pool of investors shared a letter with Mitsubishi Electric Corp. regarding the company’s alleged failure to respect union rights in Thailand.</p> <p>In March 2022, Mitsubishi Electric provided a detailed written response to the investor enquiry stating that Mitsubishi Electric Consumer Products (Thailand) Co. Ltd. (MCP) maintains good relations with the labour unions and settled a dispute with the MCP labour union and IndustriALL in 2021 following the measures taken to comply with the January 2021 decision by the Thai Supreme Court over the dismissal of a former union president. The company also shared information about its daily dialogue with local unions in Thailand. The company highlighted that it complies with the labour-related laws and regulations of the countries and regions in which it operates. Mitsubishi Electric stated that it does not entrust reviews to a third-party organization, but that the company conducts internal audits to ensure that every affiliated company is operating according to the Group Code of Conduct. Mitsubishi Electric’s Code of Conduct is available in multiple languages, and the company also conducts regular compliance training for all employees to monitor their level of understanding of these policies.</p> <p>ISS ESG notes the disclosure of information regarding the union rights in Thailand and measures implemented to mitigate and remediate the issues raised by the local labour unions. However, the company has yet to provide supporting documents, including disclosure of the recent audit findings and results of regular inspections conducted at its local operations, ensuring compliance with its policies.</p> <p>ISS ESG continues to monitor further developments on the case as well as progress of dialogue between the company, local union, and global trade union federation IndustriALL to ensure adequate implementation of policy commitment on union rights and all matters are resolved.</p>	

<p>Rio Tinto Limited/ Rio Tinto Plc</p>	<p>ISIN AU000000RIO1/ GB0007188757</p>
<p>THEME Human rights due diligence, Indigenous rights</p>	<p>LOCATION Australia</p>
<p>ACTIVITY SUMMARY</p>	<p>In Q1 2022, the pool of investors shared a letter with Rio Tinto Limited and Rio Tinto Plc regarding their involvement in the failure to respect indigenous rights at Brockman 4 mine in Australia.</p> <p>In March 2022, Rio Tinto provided a detailed written response to the investor enquiry, outlining the information regarding its commitments to improve communities and social performance practices and to building more meaningful and genuine relationships with Indigenous people and host communities across the world. In 2022, the company is increasing the communication with external stakeholders at all levels such as the government, civil society organizations, Traditional Owners, etc. The company has initiated organized remediation efforts in collaboration with Puutu Kunturrakama and Pinikura (PKKP) people and has committed to improving transparency and social performance. Rio Tinto supports Indigenous employment and has designed an Indigenous leadership commitment to promoting Indigenous Australians into professional and leadership roles. The company has revised its social processes and policies and taken such steps as creating the Chief Executive Australia and Chief Adviser roles to broaden its scope to engage on critical matters with external stakeholders in Australia. Rio Tinto has established its new Communities and Social Performance (CSP) model and has also strengthened its governance and improved assurance and risk management processes to increase its social performance capability across the business.</p> <p>ISS ESG notes the details Rio Tinto has provided in this engagement, based on which ISS ESG assessed that the company had initiated measures regarding disclosing relevant information, implementation of relevant policies, remedial action, and termination of problematic policies.</p> <p>ISS ESG continues to monitor further developments on the company’s action plan and the CSP model and will continue to monitor the disclosure of the CSP Report, efficacy of the ongoing remediation and co-management arrangements with the PKKP people.</p>

<p>Top Glove Corp. Bhd.</p>	<p>ISIN MYL711300003</p>
<p>THEME Forced labour</p>	<p>LOCATION Malaysia</p>
<p>ACTIVITY SUMMARY</p>	<p>In Q1 2022, the pool of investors shared a letter with Top Glove Corp. Bhd. regarding the company’s alleged failure to prevent forced labour in Malaysia.</p> <p>On 14 February 2022, Top Glove took part in a web meeting with investor clients, facilitated by ISS ESG. During this conversation, the company updated investor clients</p>


on measures taken to improve its recruitment procedures, specifically migrant worker debt. Along with reimbursing recruitment fees for over 13,000 migrant workers, Top Glove has introduced decent working hours, improvised accommodations, enhanced workplace policies and grievance mechanisms, improved workplace health and safety, and will conduct internal and external audits based on international standards. Additionally, the company highlighted steps taken to strengthen grievance channels for workers, specifically how it publicly reports on the number and nature of these grievances and continues to monitor working conditions, through two third-party auditors. The company also shared its commitment to disclose audit findings and the number, nature and status of grievances raised through its externally managed and internal grievance channels in its FY2022 Sustainability Report.

ISS ESG notes the details Top Glove has provided in this engagement, based on which ISS ESG assessed that the company had expressed commitment to the ongoing disclosure of relevant information and initiated measures concerning implementation of relevant policies, remedial action, and termination of problematic policies.

ISS ESG will continue to monitor these disclosures, along with any allegations raised by stakeholders, to assess the efficacy of the company's measures to identify and mitigate labour rights violations.


SUMMARY OF ENGAGEMENTS CONDUCTED IN Q1 2022


The following pages list engagement dialogues that occurred during Q1 2022 for engagements that commenced in Q1 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.

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

ACS Actividades de Construccion y Servicios SA		ISIN ES0167050915
 	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; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q1 2022
THEME Environment: Environmental Impacts		LOCATION Canada
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
THEME Human Rights: Indigenous Rights		LOCATION Canada
DISCLOSURE No measures announced		IMPLEMENTATION OF POLICIES No measures announced

GOALS SET & PROGRESS ACHIEVED	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced
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AES Andes SA		ISIN US00105DAB10
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q3 2020
THEME Environment: Air Pollution		LOCATION Chile
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

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 SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q3 2021
THEME Labour Rights: Union Rights		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated
THEME Corruption: Bribery		LOCATION China
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated
THEME Corruption: Bribery		LOCATION Ghana
	DISCLOSURE	IMPLEMENTATION OF POLICIES

GOALS SET & PROGRESS ACHIEVED	Measures initiated	No measures announced
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated
THEME Corruption: Bribery		LOCATION Nepal
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated
THEME Corruption: Bribery		LOCATION United Arab Emirates
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated
THEME Corruption: Bribery		LOCATION Sri Lanka
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated
THEME Corruption: Bribery		LOCATION Taiwan
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated
THEME Corruption: Bribery		LOCATION Malaysia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated
THEME Corruption: Bribery		LOCATION Kuwait


GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES N/A
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A


Alphabet Inc.		ISIN US02079K1079
	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: Workplace Health and Safety		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed
THEME Corruption: Anti-Competitive Behaviour		LOCATION Several countries
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated
THEME Human Rights: Consumer Rights		LOCATION France
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated

Amazon.com, Inc.		ISIN US0231351067
	SDG ALIGNMENT 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 Q1 2021


SDG 10: Reduced Inequalities; 10.1: Achieve and sustain income growth		
THEME Labour Rights: Just and Favourable Conditions of Work		LOCATION Italy
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
THEME Labour Rights: Union Rights		LOCATION Germany
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced
THEME Labour Rights: Just and Favourable Conditions of Work		LOCATION Spain
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
THEME Labour Rights: Just and Favourable Conditions of Work		LOCATION United Kingdom
GOALS SET & PROGRESS 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 United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced
BHP Group Limited		ISIN AU000000BHP4
	SDG ALIGNMENT	QUARTER Q1 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 SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes		
THEME Environment: Water Pollution		LOCATION Brazil
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Credible measures adopted
	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

Companhia de Saneamento do Parana		ISIN BRSAPRACNOR9
	SDG ALIGNMENT SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q3 2021
THEME Environment: Water Pollution		LOCATION Brazil
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated


Delta Air Lines, Inc.		ISIN US2473617023
	SDG ALIGNMENT SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages	QUARTER Q1 2022


SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers		
THEME Labour Rights: Union Rights		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed

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 SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q1 2022
THEME Environment: Water Pollution		LOCATION Indonesia
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


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: Workplace Health and Safety		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed
THEME		LOCATION

Bribery: Anti-Competitive Behaviour		Several countries
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated
THEME Human Rights: Consumer Rights		LOCATION France
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated

Jardine Cycle & Carriage Limited		ISIN SG1B51001017
	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 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 2021
	THEME Human rights: Indigenous Rights	LOCATION Indonesia
	GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Commitment expressed


Jardine Matheson Holdings Ltd.		ISIN BMG507361001
	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 Q3 2021
	THEME	LOCATION
	GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Commitment expressed


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

Jardine Strategic Holdings Ltd.		ISIN BMG507641022
	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 Q3 2021
THEME Human rights: Indigenous Rights		LOCATION Indonesia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Commitment expressed


Meta Platforms, Inc.		ISIN US30303M1027
	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: Workplace Health and Safety		LOCATION Ireland
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Commitment expressed
THEME Labour Rights: Workplace Health and Safety		LOCATION United States


GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed


Mitsubishi Electric Corp.		ISIN DE0008621392
	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 Thailand
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated


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


Petroleos Mexicanos SA		ISIN US71654QAW24
	SDG ALIGNMENT	QUARTER Q4 2021

	<p>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> <p>SDG 11: Sustainable Cities and Communities; 11.3: Inclusive and sustainable urbanization</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>		
THEME Labour Rights: Workplace Health and Safety		LOCATION Mexico	
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated	
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated	
THEME Environment: Soil and Water Pollution		LOCATION Mexico	
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated	
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated	


PT Astra International Tbk		ISIN ID1000057607	
	<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 11: Sustainable Cities and Communities; 11.3: Inclusive and sustainable urbanization</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 & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed	
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Commitment expressed	


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
THEME Environment: Air Pollution		LOCATION Indonesia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Commitment expressed

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: Adequate Standard of Living		LOCATION Laos
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

Rio Tinto Limited		ISIN AU000000RIO1
	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 2022
THEME Human Rights: Indigenous Rights		LOCATION Australia
	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated

GOALS SET & PROGRESS ACHIEVED	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Commitment expressed
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Rio Tinto Plc		ISIN GB0007188757
	<p>SDG ALIGNMENT</p> <p>SDG 10: Reduced Inequalities; 10.7: Facilitate orderly, safe, regular, and responsible migration</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>	QUARTER Q1 2022
THEME Human Rights: Indigenous Rights		LOCATION Australia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Commitment expressed


Serco Group Plc		ISIN GB0007973794
	<p>SDG ALIGNMENT</p> <p>SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes</p> <p>SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands</p>	QUARTER Q3 2021
THEME Human Rights: Inhumane and/or Degrading Treatment		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


SIPEF SA/NV		ISIN BE0003898187
	SDG ALIGNMENT	QUARTER Q3 2021


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		
SDG 10: Reduced Inequalities; 10.1: Achieve and sustain income growth		
THEME Labour Rights: Working Conditions		LOCATION Indonesia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated

SNC-Lavalin Group Inc.		ISIN CA78460T1057
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage	QUARTER Q1 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	
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 Canada
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced
THEME Environment: Biodiversity		LOCATION Canada
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced


Sumitomo Corp.		ISIN JP3404600003
SDG ALIGNMENT		QUARTER


	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	Q1 2022
THEME Labour Rights: Union Rights		LOCATION Honduras
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	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
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 AES Corporation		ISIN US00130H1059
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q3 2020
THEME Environment: Air Pollution		LOCATION Chile
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

The Brinks Company		ISIN US1096961040
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	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	

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 SDG 10: Reduced Inequalities; 10.7: Facilitate orderly, safe, regular and responsible migration		QUARTER Q1 2022
THEME Labour Rights: Forced Labour			LOCATION Malaysia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	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 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 Q4 2022
THEME Environment: Soil and Water Pollution			LOCATION Russia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated	
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Measures initiated	

Vale SA		ISIN US91912E1055	
	<p>SDG ALIGNMENT</p> <p>SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services,</p> <p>SDG 2: Zero Hunger; 2.1: End hunger and ensure access by all people to safe, nutritious and sufficient food</p> <p>SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages</p> <p>SDG 6: Clean Water and Sanitation; 6.1: Universal and equitable access to safe and affordable drinking water</p> <p>SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials</p> <p>SDG 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</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 2022</p>		
	<p>THEME Human Rights: Adequate Standard of Living</p>		
	<p>LOCATION Brazil</p>		
	<p>GOALS SET & PROGRESS ACHIEVED</p>	<p>DISCLOSURE Measures initiated</p>	<p>IMPLEMENTATION OF POLICIES Commitment expressed</p>
		<p>TERMINATION OF PRACTICE Measures initiated</p>	<p>REMEDIAL ACTION Measures initiated</p>
	<p>THEME Environment: Water Pollution</p>		<p>LOCATION Brazil</p>
<p>GOALS SET & PROGRESS ACHIEVED</p>	<p>DISCLOSURE Credible measures adopted</p>	<p>IMPLEMENTATION OF POLICIES Credible measures adopted</p>	
	<p>TERMINATION OF PRACTICE Measures initiated</p>	<p>REMEDIAL ACTION Measures initiated</p>	
<p>THEME Labour Rights: Safe and Healthy Working Conditions</p>		<p>LOCATION Brazil</p>	
<p>GOALS SET & PROGRESS ACHIEVED</p>	<p>DISCLOSURE Measures initiated</p>	<p>IMPLEMENTATION OF POLICIES Measures initiated</p>	
	<p>TERMINATION OF PRACTICE N/A</p>	<p>REMEDIAL ACTION Measures initiated</p>	

RESPONSIVENESS TO Q1 2022 ENGAGEMENT LETTERS

The following table provides an overview of the responsiveness to the engagement initiated in this quarter, as per 31 March 2022. Companies that had yet to respond to the initial engagement letters were sent reminder notifications on 18 April 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
Aegea Saneamento e Participacoes SA	US00775CAA45	Corruption	No
Bharat Heavy Electricals Limited	INE257A01026	Environment	No
Delta Air Lines, Inc.	US2473617023	Labour rights	Yes
Export-Import Bank of India	INE514E08AQ5	Environment	No
FGV Holdings Bhd.	MYL5222OO004	Environment	No
Freeport-McMoRan, Inc.	US35671D8570	Human Rights	Yes
ING Bank NV	NL0006420150	Corruption	No
ING Groep NV	NL0011821202	Corruption	No
Kangmei Pharmaceutical Co., Ltd.	CNE0000017M1	Corruption	No
KT Corp.	KR7030200000	Corruption	No
Luckin Coffee, Inc	US54951L1098	Corruption	No
Lyft, Inc.	US55087P1049	Labour Rights	No
Meituan	KYG596691041	Corruption	No
Mitsubishi Electric Corp.	JP3902400005	Labour Rights	Yes
NTPC Limited	INE733E01010	Environment	No
Progenity, Inc.	US74319F1075	Corruption	No
PT Sampoerna Agro Tbk	ID1000106107	Environment	Yes
Rio Tinto Limited	AU000000RIO1	Human Rights	Yes
Rio Tinto Plc	GB0007188757	Human Rights	Yes
Shikun & Binui Ltd.	IL0010819428	Corruption	No
Sumitomo Corp.	JP3404600003	Labour Rights	Yes
The Brinks Company	US1096961040	Labour Rights	No

Titas Gas Transmission & Distribution Co. Ltd.	BD0311TGAS01	Human Rights	No
Universal Electronics Inc.	US9134831034	Labour Rights	No

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