Company Name: BNK Test Company

Registration Data:

Main contact person: (Person to be contacted in the case of questions)

Function/position:

Department:

Address:

Town/city:

Zip:

Country:

Phone:

E-mail:

Web:
CSA 2024 - Test Companies CA

0 Company Information

0.1 Denominator - Total Employees

Please provide the following information for your organization. This information will be used throughout the questionnaire to normalize other reported data, as well as for our research purposes. **Please provide information for all parts of this question.**

Supporting evidence:

**Reporting Currency**

Please select your company's reporting currency. This currency will be used throughout the questionnaire for consistency purposes, and will automatically be selected for questions asking for monetary data. If you would like to change the default currency, you can do so by changing the currency selection below. Unless otherwise specified, all monetary values should be reported in their absolute values.

- EUR - Euro
- USD - US Dollar
- AED - UAE Dirham
- AUD - Australian Dollar
- BMD - Bermudian Dollar
- BRL - Brazilian Real
- CAD - Canadian Dollar
- CHF - Swiss Francs
- CLP - Chilean Peso
- CNY - Yuan Renminbi
- COP - Colombian Peso
- CZK - Czech Koruna
- DKK - Danish Krone
- EGP - Egyptian Pound
- GBP - Pound Sterling
- HKD - Hong Kong Dollar
- HUF - Forint
- IDR - Rupiah
- ILS - New Israeli Sheqel
- INR - Indian Rupee
- JPY - Yen
- KRW - Won
- LKR - Sri Lanka Rupee
- MXN - Mexican Peso
- MYR - Malaysian Ringgit
- NOK - Norwegian Krone
- NZD - New Zealand Dollar
- PEN - Sol
- PHP - Philippine Peso
- PLN - Zloty
- QAR - Qatari Rial
- RUB - Russian Ruble
- SEK - Swedish Krona
- SGD - Singapore Dollar
- THB - Baht
- TRY - Turkish Lira
- TWD - New Taiwan Dollar
- ZAR - Rand
- PKR - Pakistani Rupee
- ARS - Argentine Peso
- KES - Kenyan Shilling
- MAD - Moroccan Dirham
- NAD - Namibian Dollar
- SAR - Saudi Riyal
- KWD - Kuwaiti Dinar
- KYD - Cayman Islands Dollar
- VND - Vietnam Dong
- AFN - Afghan Afghani
- ALL - Albanian Lek
- AMD - Armenian Dram
- ANG - Netherlands Antillean Guilder
- AOA - Angolan Kwanza
- AWG - Aruban Florin
- AZN - Azerbaijani Manat
- BAM - Bosnian Convertible Marks
- BBD - Barbados Dollar
- BDT - Bangladeshi Taka
- BGN - Bulgarian Lev
- BHD - Bahraini Dinar
- BIF - Burundi Franc
- BND - Brunei Dollar
- BOB - Bolivian Boliviano
- BSD - Bahamian Dollar
- BTN - Bhutan Ngultrum
- BWP - Botswanan Pula
- BYN - Belarusian Ruble
- BZD - Belize Dollar
- CDF - Congolese Franc
- CRC - Costa Rican Colon
- CUP - Cuban Peso
- CVE - Cape Verde Escudo
- DJF - Djibouti Franc
- DOP - Dominican Peso
- DZD - Algerian Dinar
- ERN - Eritrean Nakfa
- ETB - Ethiopian Birr
- FJD - Fiji Dollar
- FKP - Falkland Islands Pound
- GEL - Georgian Lari
- GHS - Ghanaian Cedi
- GMD - Gambian Dalasi
- GNF - Guinea Franc
- GTQ - Guatemalan Quetzal
- GWP - Guinea-Bissau Peso
- HNL - Honduran Lempira
- HRK - Croatian Kuna
- HTG - Haitian Gourde
- IOD - Iraqi Dinar
- IRR - Iranian Rial
- ISK - Icelandic Krona
- JMD - Jamaican Dollar
- JOD - Jordanian Dinar
- KGS - Kyrgyzstani Som
- KHR - Cambodian Riel
- KMF - Comoro Franc
- KPW - North Korean Won
- KZT - Kazakhstan Tenge
- LAK - Lao Kip
- LBP - Lebanese Pound
- LRD - Liberian Dollar
- LSL - Lesotho Loti
- LYD - Libyan Dinar
- MDL - Moldovan Leu
- MGA - Malagasy Ariary
- MKD - Macedonian Denar
- MMK - Myanmar Kyat
- MNT - Mongolian Tugrik
- MOP - Macau Pataca
- MRU - Mauritanian Ouguiya
- MUR - Mauritius Rupee
- MVR - Maldivian Rufiyaa
- MWK - Malawian Kwacha
MZN - Mozambican Metical
NGN - Nigerian Naira
NIO - Nicaraguan Cordoba Oro
NPR - Nepalese Rupee
OMR - Omani Rial
PAB - Panamanian Balboa
PGK - Papua New Guinea Kina
PYG - Paraguayan Guarani
RON - Romanian Leu
RSD - Serbian Dinar
RWF - Rwanda Franc
SBD - Solomon Islands Dollar
SCR - Seychelles Rupee
SDG - Sudanese Pound
SHP - Saint Helena Pound
SLL - Sierra Leone Leone
SOS - Somali Shilling
SRD - Suriname Dollar
SYP - Syrian Pound
SZL - Eswatini Lilangeni
TJS - Tajik Somoni
TMT - Turkmenistan Manat
TND - Tunisian Dinar
TOP - Tongan Pa'anga
TTD - Trinidad And Tobago Dollar
TZS - Tanzanian Shilling
UAH - Ukraine Hryvnia
UGX - Uganda Shilling
UYU - Peso Uruguayo
UZS - Uzbekistani Som
VES - Venezuelan Bolivar Soberano
VUV - Vanuatu Tatu
WST - Samoan Tala
XAF - CFA Franc BEAC
XCD - East Caribbean Dollar
XOF - CFA Franc BCEAO
XPF - CFP Franc
YER - Yemeni Rial
ZMW - Zambian Kwacha
ZWL - New Zimbabwe Dollar

Normalization Factors
**Total Employees** will be used as the normalization factor for data reported in the environmental dimension ("Emissions", "Waste", "Water" and "Resource Efficiency and Circularity" criteria) in your industry. **Please also provide information for all other requested fields.**

**Fiscal year-end date**

Please specify your fiscal year-end date in the following format: dd.mm.yyyy (e.g. 31.12.2023)

<table>
<thead>
<tr>
<th>Company Data</th>
<th>Financial Year 2020</th>
<th>Financial Year 2021</th>
<th>Financial Year 2022</th>
<th>Financial Year 2023</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Revenues</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Please indicate if figures are reported or constant currency:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>☐ Constant Currency</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>☐ Reported Revenues</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total Employees</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Info Text:**

Question Rationale: The information asked in this question is required by us to normalize quantitative data provided in other questions and criteria (e.g., Emissions). Company data reported here may also be used to normalize other reported data in the questionnaire or may be used by us for research purposes. Key Definitions - Revenues: Please provide the revenues in your reporting currency, and indicate which currency you have used in the comment box. Please provide constant currency (foreign exchange adjusted) revenues if possible, as they eliminate the effect of fluctuations in foreign exchange rates and are thus a better indicator of business performance. However, reported revenues are also accepted. - Total Employees: the number of people employed on a full time and part-time basis by the company, calculated as: Total Employees = Full Time Employees + 0.5 * Part Time Employees. If you calculate your total number of employees differently, please describe your method in the comment box. Data Requirements - Please provide information for all parts of this question and ensure that the figures provided are consistent over four years as well as consistent with the figures (e.g., emissions) provided in the other questions. - Reporting currency: currency selected will be used throughout the questionnaire for consistency purposes, and will automatically be selected for questions asking for monetary data. - Unless otherwise specified, all monetary values should be reported in their absolute values. - If available for your industry, please select the appropriate normalization factor to be used for normalizing data reported in the "Operational Eco-Efficiency." Supporting evidence: No document is required to support your response. You may still provide a reference using the reference clip. This could include examples of the underlying calculations or approaches to data aggregation used to compile the provided quantitative information.

1 Governance & Economic Dimension

1.1 Transparency & Reporting

To confidently use sustainability-related data and reports produced by companies, stakeholders must be able to rely on accurate information that has been collected, elaborated and presented in a transparent manner. This criterion aims to assess how companies set and communicate the reporting boundaries associated to their sustainability-disclosure, whether they certify the quality and accuracy of the disclosed data through third-party verification and assurance processes, and whether they define the eligibility and/or alignment of their business activities to relevant sustainable finance taxonomies.
1.1.1 Sustainability Reporting Boundaries

This question requires publicly available information.

Does your company publicly report on the scope or reporting boundaries of your sustainability disclosure?

- Yes, we publicly disclose the reporting boundaries or scope of reporting used for our sustainability disclosure. Please choose the option that best describes your reporting boundaries and provide public supporting evidence:
  - All activities fully consolidated for financial reporting purposes are covered
  - The following percentage of our revenues is covered by our sustainability disclosure:
    - 75-100%
    - 50-75%
    - 25-50%
    - 0-25%
  - All activities under operational control and/or majority-owned are covered
  - None of the above applies, but we provide the criteria used for sustainability data disclosure (e.g. list of included or excluded entities, geographies or divisions)

- We don’t have a dedicated section of our disclosure that describes our reporting boundaries, but we disclose the coverage of some specific environmental or social indicators. Please select the options that apply:
  - Some environmental indicators have coverage details
  - Some social indicators have coverage details

- We don’t publicly state the reporting boundaries of our sustainability disclosure, nor coverage of single environment or social indicators.

- Not applicable. Please provide explanations in the comment box below.

Info Text:
Question Rationale Setting clear sustainability reporting boundaries is necessary for stakeholders and investors to understand how the sustainability disclosure of a company reflects its organizational and management reality. The greater the scope of the information is disclosed, the more it is representative of a company’s business activities as a whole, providing a more accurate picture of the environmental and social impacts of the company. Because of this, stakeholders and established standards and frameworks are expecting companies to increasingly align their sustainability disclosure with the boundaries set for financial disclosure. Key Definitions Financially consolidated activities: refer to all subordinate entities, subsidiaries, etc. that the company has consolidated in its financial statement. Financial accounting standards require reporting companies to consolidate all entities that they control. Operational control: an organization has operational control over an operation if the former has the authority to introduce and implement its processes and operating policies. Majority-owned activities: subordinate entities or subsidiaries in which the reporting company (e.g., parent company) owns more than 50% of outstanding shares. Disclosure Requirements - This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications, corporate citizenship/corporate social responsibility report, financial report) or corporate website. - Please ensure that the information needed to mark any of the options is clearly disclosed in the attached documents Specific requirements for the single-choice selection: - If your company has disclosed the reporting boundaries or scope of reporting used for your sustainability disclosure, and more than one option can be selected among those in the single-choice section, please consider that a high (75-100%) revenue coverage of a company’s sustainability disclosure or an alignment between the financial consolidation and sustainability disclosure are considered best practices and should be used as options. - If the majority of your revenue is derived from minority (non-consolidated) interests, please use the revenue field to indicate the coverage of your sustainability disclosure. Please also provide a brief description of your minority interests in the comment box of the question, explaining how they have been included in your sustainability disclosure and within the CSA. - If you have used the revenue field, but the revenue coverage is not explicitly stated in the reporting boundaries section of your sustainability disclosure, please provide the necessary public documents to corroborate the coverage range provided and indicate the necessary calculations in the comment box. For groups and
holding companies, this percentage coverage must be calculated against the total revenue reported in the consolidated financial statement.

1.1.2 Sustainability Reporting Assurance

This question requires publicly available information.

Does the company employ external assurance providers to conduct assurance for its sustainability reporting and is this information available publicly?

○ Yes, the company's sustainability reporting is externally assured. Please indicate where this information is available in public reporting or corporate website.
  ☐ The assurance statement is based on a recognized international or national standard (e.g. AA1000AS, ISAE 3000).
  ☐ The assurance statement contains a "declaration of independence" which specifies that the assurance provider has no conflict of interest in relation to providing the assurance of environmental and / social data for the company which has been assured.
  ☐ The scope of the assurance statement clearly indicates that it covers environmental KPIs. If only some KPIs are assured, then it is clearly indicated which data/KPIs disclosed in the report have been assured.
  ☐ The scope of the assurance statement clearly indicates that it covers social KPIs. If only some KPIs are assured, then it is clearly indicated which data/KPIs disclosed in the report have been assured.
  ☐ The assurance statement contains a conclusion, i.e. either "reasonable assurance" or "limited assurance"

○ No, the company does not publicly report information on whether its sustainability reporting is externally assured.

○ Not applicable. Please provide explanations in the comment box below.

Info Text:
Question Rationale As with financial data, assurance of environmental and social data ensures that it is more reliable and increases the likelihood that investors will use these data in their analysis and investment decisions. Transparency about the assurance process and the data assured also increases stakeholders' trust in published information. The purpose of this question is to assess the extent to which companies are disclosing the details related to their environmental and social assurance. Key Definitions Assurance specialists: Include accountants, certification bodies, and specialist consultancies. It does not include an independent advisory board, stakeholder panel, or high-level individual (e.g., Environmental Minister). The declaration of independence: An explicit statement of independence from the auditor confirming that there is no other commercial link to the company's operations or business that could result in a conflict of interest. Recognized international or national standard: refers to assurance standards and not reporting standards (such as GRI guidelines). Examples of these assurance standards are AA1000AS and ISAE 3000, but regional or local standards are also acceptable if they are clearly specified and are comparable to international standards. Examples include: - Standard DR03422 (Australia/New Zealand) - Assurance Engagements of Sustainability Reports (Germany) - Environmental Report Assurance Services Guidelines by the JICPA (Japan) - FAR auditing standard RevR6 (Sweden) - Standard 3810 Assurance Engagements related to Sustainability Reports (the Netherlands) - AT-C Section 105 and 210 (United States/Canada) Scope of assurance: If the scope of assurance covers some (but not all) environmental indicators, these need to be clearly marked in the relevant sections of the report. If the assurance statement covers all data items in the report, this also needs to be explicitly stated. Conclusion/Level of assurance: This refers to the conclusion of the assurance process which is in accord with the level of assurance, i.e., limited/moderate or reasonable assurance. The level of assurance indicates the extent and depth of the work the assurance provider undertakes in relation to sustainability disclosures. Most assurance providers offer two levels: "reasonable" assurance (i.e., high but still involving some risk of inappropriate conclusion) or "limited" assurance (i.e., moderate) (GRI, 2013). Supporting evidence: This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company
publications, separate fuel efficiency strategy document) or corporate website. Any response that cannot be verified in the attached public document(s) will not be accepted.

1.1.3 MSA Transparency & Reporting

In this section we include a performance score on the Corporate Sustainability Monitoring with the objective of verifying the company’s involvement and management of crisis situations that can have a damaging effect on reputation. The evaluation will be filled in by the responsible analyst of your industry. No additional information is required from your company.

Info Text:
Based on a Media and Stakeholder Analysis (MSA), the consistency of a company’s behavior and management of crisis situations is reviewed in line with its stated principles and policies. Results of the MSA range from no impact to high impact - the latter reflecting serious reputational risks with consequences on the company’s bottom line (e.g. legal liabilities or high probability of imminent legal liabilities). In addition, the overall quality of the management response to a situation is assessed, evaluating whether a company has transparently and proactively managed the issue.

1.2 Corporate Governance

Corporate governance systems ensure that a company is managed in the interests of shareholders (including minority shareholders). On the one hand this includes checks and balances that enable the Board of Directors to have appropriate control and oversight responsibilities. Empirical evidence suggests that over a period of 5 years, the difference in return on equity between well-governed and badly-governed companies can be as much as 56% (source: GMI 2007). On the other hand management incentives have to be set in such a way that management interests are aligned with shareholders' interests. Our questions focus on board structure, composition of the board and related committees, board effectiveness and measures to ensure alignment with shareholders' long-term interests, which include transparency and the structure of executive remuneration as well as share ownership requirements.

1.2.1 Board Independence

This question requires publicly available information.

Does your company have a publicly available independence statement for the board of directors?

❍ Yes, we have a publicly available independence statement. Please indicate below what the statement includes and provide a reference:

  Listed companies are required to provide links to public reports or corporate websites.
  Non-Listed companies are required to provide internal documents and/or links to public reports or corporate websites.

❍ We comply with the following corporate governance code or stock exchange rules

  ❍ Australia - Australian Stock Exchange (ASX)
  ❍ Austria - Austrian Code of Corporate Governance
  ❍ Azerbaijan - Azerbaijani Economic Development Ministry
  ❍ Bahrain - Kingdom of Bahrain Ministry of Industry and Commerce
  ❍ Belgium - Brussels Stock Exchange
  ❍ Bosnia and Herzegovina - Republic of Srpska Securities Commission
Brazil - Novo Mercado Listing Regulation (New Market Listing Regulation)
Chile - the Chilean Law N° 18.046 independent director definition
Colombia - Code of Best Practices
Croatia - Zagreb Stock Exchange
Cyprus - Cyprus Stock Exchange
Denmark - Recommendations on Corporate Governance
Egypt - Egyptian Corporate Governance Code
European Union - Recommendations of the European commission
Finland - Helsinki Stock Exchange
France - Paris Stock Exchange - Afep-Medef Code
Germany - The German Corporate Governance Code
Greece - Hellenic Corporate Governance Code For Listed Companies
Hong Kong - Hong Kong Exchange (HKEX)
Hungary - Budapest Stock Exchange
Iceland - Iceland Chamber of Commerce
India - National Stock Exchange (NSE) and SEBI(LODR)
Ireland - Corporate Governance Code for Credit Institutions and Insurance Undertakings 2013
Italy - Corporate Governance Code (Italy)
Italy - Italian Consolidated Financial Act
Japan - Tokyo Stock Exchange (TSE)
Kenya - The Capital Markets Authority
Lebanon - Lebanese Transparency Association (LTA)
Luxembourg - Luxembourg Stock Exchange
Mexico - Mexican Securities Market Law
Netherlands - Amsterdam Exchange (AEX) - Dutch Corporate Governance Code
New Zealand - New Zealand Corporate Governance Forum Guidelines
Nigeria - Financial Reporting Council of Nigeria
Norway - Oslo Børs
Oman - Sultanate of Oman Capital Market Authority
Philippines - Securities and Exchange Commission Philippines
Qatar - Qatar Financial Market Authority
Romania - Bucharest Stock Exchange
Russian Federation - Moscow Exchange - Russian Code of Corporate Governance
Saudi Arabia - Saudi Stock Exchange
Singapore - Monetary Authority of Singapore (MAS)
Slovenia - Ljubljana Stock Exchange
South Africa - Johannesburg Stock Exchange (JSE)
Spain - Bolsa de Madrid
Sweden - Stockholm Stock Exchange (SSE)
Thailand - The Stock Exchange of Thailand (SET)
Taiwan - Taiwan Stock Exchange
UK - London Stock Exchange (LSE)
USA - New York Stock Exchange (NYSE) and National Association of Securities Dealers Automated Quotations (NASDAQ)
Vietnam - The State Securities Commission of Vietnam (SSC)
Indonesia - Indonesia Stock Exchange

The stock exchange we follow is not on the list or we have our own stricter independence requirements. The requirements cover the following:

- The director must not have been employed by the company in an executive capacity within the last year.
- The director must not accept or have a “Family Member who accepts any payments from the company or any parent or subsidiary of the company in excess of $60,000 during the current fiscal year”, other than those permitted by SEC Rule 4200 Definitions, including (i) payments arising solely from investments in the company's securities; or (ii) payments under non-discretionary charitable contribution matching programs. Payments that do not meet these two criteria are disallowed.
- The director must not be a “Family Member of an individual who is [...] employed by the company or by any parent or subsidiary of the company as an executive officer.”
- The director must not be (and must not be affiliated with a company that is) an adviser or consultant to the company or a member of the company's senior management.
- The director must not be affiliated with a significant customer or supplier of the company.
- The director must have no personal services contract(s) with the company or a member of the company's senior management.
- The director must not be affiliated with a not-for-profit entity that receives significant contributions from the company.
- The director must not have been a partner or employee of the company's outside auditor during the past year.
- The director must not have any other conflict of interest that the board itself determines to mean they cannot be considered independent.

Target Share

We have a target share of independent directors on the board. Please specify:

- No, we do not have an independence statement that meets the disclosure requirements of this question for listed/non-listed companies.
- Not applicable. Please provide explanations in the comment box below.
- Not known

Info Text:

Question Rationale: An independent director is a member of the company’s board of directors that is brought in from outside the organization. Independent directors can bring new insights and balance that improve the performance of a company through their objective view of the company’s health and operations. At times, they can also bring specific expertise from their experience as well as provide additional accountability. We assess the extent to which companies have made explicit statements about their definitions of and requirements with respect to board members' independence. Key Definitions: Independent directors: are non-executive directors that are independent by meeting at least 4 of the 9 criteria (of which at least 2 of the 3 first criteria) listed below: 1. The director must not have been employed by the company in an executive capacity within the last year. 2. The director must not accept or have a “Family Member who accepts any payments from the company or any parent or subsidiary of the company in excess of $60,000 during the current fiscal year”, other than those permitted by SEC Rule 4200 Definitions, including (i) payments arising solely from investments in the company's securities; or (ii) payments under non-discretionary charitable contribution matching programs. Payments that do not meet these two criteria are disallowed. 3. The director must not be a “Family Member of an individual who is [...] employed by the company or by any parent or subsidiary of
the company as an executive officer.” 4. The director must not be (and must not be affiliated with a company that is) an adviser or consultant to the company or a member of the company’s senior management. 5. The director must not be affiliated with a significant customer or supplier of the company. 6. The director must have no personal services contract(s) with the company or be a member of the company’s senior management. 7. The director must not be affiliated with a not-for-profit entity that receives significant contributions from the company. 8. The director must not have been a partner or employee of the company’s outside auditor during the past year. 9. The director must not have any other conflict of interest that the board itself determines to not be considered independent. Data Requirements - Please provide your publicly available independence statement, public reporting on the definition of independence used (i.e., if it is in line with local or international standards corresponding to the definition used by us), and public reporting on the target share of independent directors on the board. - Please select the stock exchange that you comply with. We do allow you to select an established national or stock exchange Corporate Governance Code as long as this also meets our definition of independence. - If you are a member of a stock exchange that is not listed or you have stricter requirements, please select what parts of the Board Independence statement your company satisfies. We expect the statement to meet at least 4 out of 9 criteria of which at least 2 of the first 3. If this is not the case, please indicate so. Specific data requirements for non-listed companies: Family-owned companies - All family members who are on the Board of Directors and employed by the company are to be considered as executive directors. - Family members that are only on the board and that do not have any executive role can be considered as independent directors if they meet at least 4 out of 9 criteria of which at least 2 of the first 3 criteria for independence. State-owned companies - Government representatives can be considered as “independent” if they meet at least 4 out of 9 criteria of which at least 2 of the first 3 criteria for independence. Disclosure Requirements Listed and/or publicly owned companies are required to provide links to public reports or corporate websites. Non-listed companies are required to provide the following evidence, depending on the type of company: - Family-owned companies and Privately owned companies are required to provide public reports, corporate websites, or internal documents. - Cooperatives are required to provide public reports, corporate websites, or internal documents. - State-owned companies are required to report on their corporate governance in the public domain as their key stakeholder is the general public.

1.2.2 Board Type

This question requires publicly available information.

Does your company publicly report on its board type? Please indicate the number of executive and non-executive directors on the board of directors/supervisory board of your company and specify where this information is available. Additional clarification on one-tier and two-tier systems is available in the information text.

**Listed companies** are required to provide links to public reports or corporate websites. **Non-Listed companies** are required to provide internal documents and/or links to public reports or corporate websites.

- Yes, we publicly report on our board type.
  Please select whether your company has a one-tier or two-tier board and provide a reference:

  ✓ **ONE-TIER SYSTEM (companies with a board of directors)**

<table>
<thead>
<tr>
<th>Executive directors</th>
<th>Number of members</th>
</tr>
</thead>
<tbody>
<tr>
<td>Independent directors</td>
<td></td>
</tr>
<tr>
<td>Other non-executive directors</td>
<td></td>
</tr>
<tr>
<td><strong>Total board size</strong></td>
<td></td>
</tr>
</tbody>
</table>

  ✓ **TWO-TIER SYSTEM (companies with a supervisory board)**

<table>
<thead>
<tr>
<th>SUPERVISORY BOARD</th>
<th>Number of members</th>
</tr>
</thead>
<tbody>
<tr>
<td>Independent directors</td>
<td></td>
</tr>
<tr>
<td>Other non-executive directors</td>
<td></td>
</tr>
</tbody>
</table>
Employee representatives (if not applicable, please leave the field empty)

<table>
<thead>
<tr>
<th>MANAGEMENT BOARD/EXECUTIVE MANAGEMENT</th>
<th>Senior executives</th>
</tr>
</thead>
</table>

No, we do not report on our board type.

Not applicable. Please provide explanations in the comment box below.

Not known

Info Text:
Question Rationale An effective board of directors, properly constituted, is the linchpin of good corporate governance. Boards are responsible for managerial performance, meeting the corporation's stated objectives, complying with applicable laws and regulations, and protecting shareholder rights and interests. To assess the quality of a board’s structure, we focus on its composition, its proportion of independent members, and its overall size, as empirical studies show that oversized boards are counter-productive to performance. Key Definitions Types of Boards: Companies can choose between one- and two-tier systems when answering the question. The descriptions below will help you identify which of these structures your company has in place. One-tier systems: have a single board consisting of executive, non-executive, and independent directors. It is possible that such boards only consist of independent directors or a combination of executive and independent directors. Most countries use a one-tier system. Two-tier systems: have an executive board and a supervisory board, which is composed of non-executive or independent members and – in certain countries – employee representatives. Countries that commonly use two-tier systems include Austria, Denmark, Finland, France, Germany, Hungary, and The Netherlands. Sweden and Norway are exceptions and should be classified as one-tier despite the presence of employee representatives on the board. For French companies that have a one-tier board system with employee representatives, in accordance with the French code of corporate governance, employee representatives should be considered non-executive directors and be included in the total board size. Types of Directors: We outline definitions of possible types of directors below. These definitions should be used to classify board members. Please note we only consider board members that are CURRENTLY (at the time the assessment is performed) on the board, e.g., if a board member has resigned (for example in March 2020) and the assessment is performed in May 2020, that board member would not be considered. Executive directors: are employees, and are usually senior managers of the company in an executive function (e.g., CEO, CFO, etc.). Independent directors: are non-executive directors that are independent by meeting the requirements set out in the Board Independence question. Other non-executive directors: are directors that are not executives but also do not qualify as independent as defined above. They are members of the board not already accounted for in the executive and independent categories. They might be employed by the organization at a non-executive level. Data Requirements This question is automatically filled out with information from S&P Capital IQ. If any correction is required, please follow these requirements: - Ensure that the type of board, the breakdown between the different types of directors, and the total board size are filled out. - If the definition of independence at the company differs from our definition given in the Board Independence question, please adjust the number of independent directors in line with our definition and provide a comment in the comment box. Specific data requirements for non-listed companies: Family-owned companies - All family members who are on the Board of Directors and employed by the company are to be considered as executive directors. - Family members that are only on the board and that do not have any executive role can be considered as independent directors if they meet at least 4 out of 9 criteria of which at least 2 of the first 3 criteria for independence. State-owned companies - Government representatives can be considered as "independent" if they meet at least 4 out of 9 criteria of which at least 2 of the first 3 criteria for independence. Disclosure Requirements Listed and/or publicly owned companies are required to provide links to public reports or corporate websites. Non-listed companies are required to provide the following evidence, depending on the type of company: - Family-owned companies and Privately owned companies are required to provide public reports, corporate websites, or internal documents. - Cooperatives are required to provide public reports.
reports, corporate websites, or internal documents. State-owned companies are required to report on their corporate governance in the public domain as their key stakeholder is the general public.

1.2.3 Non-Executive Chairperson/ Lead Director

This question requires publicly available information.

Is the board of directors/supervisory board headed by a non-executive and independent chairperson and/or an independent lead director? Please indicate where this information is available.

Listed companies are required to provide links to public reports or corporate websites. Non-Listed companies are required to provide internal documents and/or links to public reports or corporate websites.

- Chairperson is non-executive and independent
- Role of CEO and chairperson is split and former CEO/chairperson (presently in a non-executive position) is now chairperson
- Role of CEO and chairperson is split and chairperson is non-executive but not independent
- Role of CEO and chairperson is split and former CEO/chairperson is now chairperson, but independent lead director is appointed. Please indicate the name of the lead director:

- Role of chairperson and CEO is joint, but independent lead director is appointed. Please indicate the name of the lead director:

- Role of chairperson and CEO is joint or chairperson is an executive director.
- We do not report this information.
- Not applicable. Please provide explanations in the comment box below.
- Not known

Info Text:

Question Rationale International consensus favors the separation of the roles of chairperson and CEO. If the board of directors opts to appoint one person fulfilling both roles, it has to build in the necessary checks and balances to avoid potential abuse of power. Companies headed by a joint chairperson/CEO are expected to explain their reasoning for this structure, have appointed a "lead independent director" and should provide a statement about the lead director's responsibilities. Key Definitions Independent lead director: this role exists to provide leadership to the board in cases where the joint roles of Chairperson and CEO could potentially be in conflict. Fundamentally, the role exists to ensure that the board operates independently of management and that directors have independent leadership at the board level. If the company has chosen either of the two options indicating that it has an independent lead director, the name of this director should be provided in the comment box. Independent directors: are non-executive directors that are independent by meeting at least 4 of the 9 criteria (of which at least 2 of the 3 first criteria) listed below: - The director must not have been employed by the company in an executive capacity within the last year. - The director must not accept or have a “Family Member who accepts any payments from the company or any parent or subsidiary of the company in excess of $60,000 during the current fiscal year”, other than those permitted by SEC Rule 4200 Definitions, including i) payments arising solely from investments in the company's securities; or ii) payments under non-discretionary charitable contribution matching programs. Payments that do not meet these two criteria are disallowed. - The director must not be a “Family Member of an individual who is [...] employed by the company or by any parent or subsidiary of the company as an executive officer.” - The director must not be (and must not be affiliated with a company that is) an adviser or consultant to the company or a member of the company's senior management. - The director must not be affiliated with a significant customer or supplier of the company. - The director must have no personal services contract(s) with the company or be a member of the company's senior management. - The director must not be affiliated with a not-for-profit entity that receives significant contributions from the company. - The director must not have been a partner or employee of the company's outside auditor during the past year. - The director must not have any other conflict of interest that the board itself determines to mean they cannot be considered independent. Disclosure Requirements Listed and/or publicly owned companies are
required to provide links to public reports or corporate websites. Non-Listed companies are required to provide the following evidence, depending on the type of company: - Family-owned companies and Privately owned companies are required to provide public reports, corporate websites, or internal documents. - Cooperatives are required to provide public reports, corporate websites, or internal documents - State-owned companies are required to report on their corporate governance in the public domain as their key stakeholder is the general public.

1.2.4 Board Diversity Policy

This question requires publicly available information.

Does the company have a formal policy on board diversity and is it available publicly?

**Listed companies** are required to provide links to public reports or corporate websites.

**Non-Listed companies** are required to provide internal documents and/or links to public reports or corporate websites.

- Yes, the company has a policy on board diversity that clearly requires diversity factors such as gender, race, ethnicity, country of origin, nationality or cultural background in the board nomination process. Please indicate where this information is available in **public reporting or corporate website**.
  - Gender
  - Race or Ethnicity
  - Nationality, country of origin or cultural background

- No, the company does not publicly report on a policy for board diversity.

- Not applicable. Please provide explanations in the comment box below.

- Not known

**Info Text:**

Question Rationale Corporate boards are tasked with monitoring companies' management teams on behalf of those companies' shareholders and other stakeholders. Boards are the direct representatives of these stakeholders and form one of the most important components of corporate governance. It is therefore important that the board members selected have the right experience and skills, are sufficiently independent, and act in the best interests of all stakeholders. Diversity adds value to the board through differences in perspectives and experience. Diverse boards will be able to assess problems from a broader point of view and are more likely to take into account the best interests of all stakeholders. Furthermore, studies have shown a positive correlation between gender diversity on boards and companies' financial performance. It can also be important for board members to have a broad and complementary range of skills, although boards' needs can differ across individual companies and industries depending on the existing and required skills of board members and the pool of qualified board members available when electing new board members.

**Key Definitions**

Local corporate governance codes: Certain local corporate governance codes include guidance on diversity criteria. This can be accepted in this question if both of the following criteria apply: - The company states that it adheres to the local corporate governance code without exception OR clearly states what those exceptions are and that they do not include the diversity factors specifically ticked in the question, and - The local corporate governance code clearly indicates that the specific criteria ticked in the response are considered for the board nomination process.

Race: In the absence of any internationally agreed definition, race is most often statistically characterized in terms of phenotype and appearance (e.g., skin colors), or with regard to ancestry. This should not be understood as an attempt to trace the definition of race to biological, anthropological, or genetic factors but rather to (somewhat artificially) distinguish it from the concept of ethnicity. (OECD, 2018) Ethnicity: Describes a shared culture: the practices, values, and beliefs that characterize those belonging to a community. This multidimensional concept acts as an umbrella term encompassing language, religious traditions, and others (United Nations, 2017). A number of related concepts, including ancestry, citizenship, and nationality, may overlap with ethnicity. However, ethnicity is not the same as nationality or citizenship, nor it is a measure of biology or genes. (OECD, 2018) Nationality: While geographic diversity has received less attention than gender or racial diversity on boards, it is clear that geographic diversity adjusts the lens through which risks and strategies are examined. In order to manage global risks and opportunities and improve board effectiveness, geographic diversity in the boardroom in a global marketplace
needs to increase. Here, nationality captures a person’s country of origin or citizenship. Data Requirements: A board diversity policy needs to contain specific requirements for diversity factors being taken into account during the board nomination process. Statements related to non-discrimination between sexes, nationalities, etc. or statements confirming that a company complies with local laws around non-discrimination are not sufficient. For two-tier board structures, the policy needs to apply to the supervisory board, not only the management board. Disclosure Requirements: Listed and/or publicly owned companies are required to provide links to public reports or corporate websites. Non-listed companies are required to provide the following evidence, depending on the type of company: - Family-owned companies and Privately owned companies are required to provide public reports, corporate websites, or internal documents. - Cooperatives are required to provide public reports, corporate websites, or internal documents. - State-owned companies are required to report on their corporate governance in the public domain as their key stakeholder is the general public.

1.2.5 Board Gender Diversity

This question requires publicly available information.

Please indicate the number of women on your company’s board of directors/supervisory board and specify where this information is available. If your company has a one-tier board structure, this figure includes: female executive directors, non-executive directors and independent directors. If your company has a two-tier board structure, this figure ONLY includes female independent directors and non-executive directors (this means that senior executives and employee representatives should not be included). Listed companies are required to provide links to public reports or corporate websites. Non-Listed companies are required to provide internal documents and/or links to public reports or corporate websites.

- Number of female directors:

- We do not report this information.

- Not applicable. Please provide explanations in the comment box below.

- Not known

Info Text:
Question Rationale: We assess whether the board reflects the diversity of the workforce and marketplace, thereby ensuring that a variety of viewpoints are heard and factored into corporate decision-making. A commitment to diversity at all levels can help companies attract employees, create goodwill with consumers, and better compete in diverse markets globally, which in turn benefits long-term shareholder value. Gender diversity has been an important topic of discussion in recent years, and various academic studies have shown a correlation between gender diversity and corporate performance, for example, in corporate governance (Adams and Ferreira, 2009) or company innovation (Deszö and Ross, 2012). Data Requirements: For two-tier boards: Employee representatives and senior executives should not be included in the total number of women for two-tier boards as they are not considered in the calculation of the total size of the supervisory board. For one-tier boards: Employee representatives should not be included in the total number of women on the board for one-tier boards. If there are no women on the board of directors or supervisory board, please write 0 in the answer to this question. For this question, we are looking for the number of women on your company's board of directors/supervisory board. - If your company has a one-tier board structure, this figure includes female executive directors, non-executive directors, and independent directors. - If your company has a two-tier board structure, this figure ONLY includes female independent directors and non-executive directors (meaning senior executives and employee representatives should not be included). Hence, the management board should not be considered in this question. Disclosure Requirements: Listed and/or publicly owned companies are required to provide links to public reports or corporate websites. Non-listed companies are required to provide the following evidence, depending on the type of company: - Family-owned companies and Privately owned companies are required to provide public reports, corporate websites, or internal documents. - Cooperatives are required to provide public reports, corporate websites, or internal documents. - State-owned companies are required to report on their corporate governance in the public domain as their key stakeholder is the general public. References: The study "Corporate Governance, Board Diversity, and Firm Value" (October 2001)
examined Fortune 1000 firms and found a significantly positive relationship between the fraction of women or minorities on the board and firm value.

### 1.2.6 Board Effectiveness

This question requires publicly available information.

How does your company ensure the effectiveness of your board of directors/supervisory board and the alignment with the (long-term) interests of shareholders?

**Listed companies** are required to provide links to public reports or corporate websites. **Non-Listed companies** are required to provide internal documents and/or links to public reports or corporate websites.

<table>
<thead>
<tr>
<th>Indicators/measures</th>
<th>Details</th>
</tr>
</thead>
</table>
| **Board Meeting Attendance**  
Number of meetings attended in percentage last business/fiscal year. | - Average board meeting attendance:  
% of meetings of board of directors/supervisory board.  
Minimum of attendance for all members required, at least (in %) |
| **Board Mandates**  
Number of other mandates of the board of directors/supervisory board members. *This only applies to non-executive and independent directors, not executive directors or employee representatives.* | - Number of non-executive/independent directors with 4 or less other mandates:  
Please provide the names of these directors:  
Number of other mandates for non-executive/independent directors restricted to: |
| **Board Performance Review**  
Please specify or provide documents:  
Regular independent assessment of board performance.  
Please specify or provide supporting documents: |
| **Board Election Process** | - Board members are elected and re-elected on an annual basis  
- Board members are elected individually (as opposed to elected by slate) |

- We do not report this information.  
- Not applicable. Please provide explanations in the comment box below.  
- Not known

**Info Text:**

Question Rationale: An effective board of directors is vital for good corporate governance. Several studies have found that companies with specific procedures and practices designed to ensure the accountability of their board and a close alignment with shareholders’ interests perform better than those that do not. We use the parameters in this question as a proxy for the overall effectiveness of the board. In addition to meeting attendance, the number of external directorships board members hold, and performance assessment, we ask
for information on how board members are elected. The frequency of elections and structure of the process can affect the accountability of board members: when board members are elected individually and on an annual basis, shareholders are able to vote them off if they are concerned with their performance. If shareholders can frequently express their confidence in or concerns about board members, the board as a whole becomes more accountable. Key Definitions This question only applies to board members who represent shareholders (or multiple stakeholders including shareholders). For two-tier board structures, this question should only include the supervisory board and not the management board. Meeting attendance: this section refers to two measures: on one hand, the actual average attendance rate for the past year, and on the other hand, if there is any corporate guideline for meeting attendance, i.e., if there is a minimum proportion of board meetings that each board member is required to attend. Both rates should be calculated on the basis of the total number of board meetings held annually. Other mandates: refers to the number of other external directorships in publicly listed companies held by members of the board of directors/supervisory board (examples include executive board positions such as CEO, or member of the board of directors at another company). Board memberships in private limited companies, educational institutes (schools, colleges, or universities), and non-profit organizations are not considered in our definition of other mandates. Only the number of mandates for independent and non-executive directors should be considered, not mandates for executive directors or employee representatives. In this section, the actual number of directors with four or fewer other mandates is considered together with any corporate guidelines on restrictions on the number of other mandates. Board performance assessments: We consider two types of assessments: (1) self-assessments of the board’s performance, meaning that the board members themselves are allowed to systematically evaluate their performance; (2) independent assessments of the board’s performance, meaning that an independent third party evaluates the board’s performance. Such assessments are considered "regular" if the company clearly shows that there are guidelines to perform them at specific intervals (such as annually or every second year). Assessments are also considered regular if the company is carrying them out for the first time but with the explicit intention of conducting them regularly. It is considered best practice to carry out both types of assessments on a regular basis, although not necessarily annually. Annual election of board members: refers to a procedure whereby each board member has to be re-elected at each annual general meeting for shareholders (as opposed to electing a member for multiple years). Individual election of board members refers to a procedure whereby each member is elected on an individual basis (as opposed to members being elected by slate). Disclosure Requirements Listed and/or publicly owned companies are required to provide links to public reports or corporate websites. Non-listed companies are required to provide internal documents and/or links to public reports or corporate websites. References Corporate Accountability Report "Does Corporate Governance Matter to Investment Returns?" by Jay W. Eisenhofer, Gregg S. Leving, ISSN 1542-9563 McKinsey Strategy & Corporate Finance "Toward a Value-Creating Board" by Conor Kehoe, Frithjof Lund, and Nina Spielmann

1.2.7 Board Average Tenure

This question requires publicly available information.

Please indicate the average tenure of board members on your company's board of directors/supervisory board in years. If your company has a one-tier board structure, this figure includes all members (executive directors, non-executive directors and independent directors). If your company has a two-tier board structure, this figure ONLY includes independent directors and non-executive directors (e.g. exclude employee representatives). Please indicate where this information is available.

Listed companies are required to provide links to public reports or corporate websites. Non-Listed companies are required to provide internal documents and/or links to public reports or corporate websites.

- Average tenure of board members in years:

- We do not report this information.
- Not applicable. Please provide explanations in the comment box below.
1.2.8 Board Industry Experience

This question requires publicly available information.

Please indicate the number of board members with relevant work experience in your company’s sector according to GICS Level 1 sector classification (excluding executive members and employee representatives) and list the directors’ names.

Listed companies are required to provide links to public reports or corporate websites.

Non-Listed companies are required to provide internal documents and/or links to public reports or corporate websites.

<table>
<thead>
<tr>
<th>Number of independent or non-executive members with industry experience (e.g., excludes executives):</th>
</tr>
</thead>
<tbody>
<tr>
<td>Please list the independent or non-executive directors included in the above count:</td>
</tr>
</tbody>
</table>

We do not report this information.

Not applicable. Please provide explanations in the comment box below.

Not known

Info Text:
Question Rationale Corporate boards are tasked with monitoring companies’ management teams on behalf of those companies’ shareholders and other stakeholders. Boards are the direct representatives of these stakeholders and form one of the most important components of corporate governance. It is therefore important that the board members selected have the right experience and skills, are sufficiently independent, and act in the best interests of all stakeholders. Board tenure reflects retention and continuity on one hand, and refreshment of skills and perspectives, and independence on the other. Research strongly supports the assertion that optimal board tenure is in the 7 to 12-year range, and that firm value declines as average tenure deviates therefrom. Data Requirements In this question, we expect disclosure on average board tenure and/or individual tenure of each member of the board of directors. Tenure: the number of years a member has served on the board of directors. Please consider the calendar year as the base year. For example: if a director was appointed in March 2014, their tenure would be counted as 2022-2014 = 8 years. Mergers and Acquisitions: If the company is a spin-off or merger, tenure from the previous company is counted. If a company is less than 10 years old, the company should mark the question as “Not applicable”. For two-tier boards: Employee representatives and senior executives should not be included in the calculation for two-tier boards, as they are not considered in the calculation of the total size of the supervisory board. The management board members should not be included when calculating the average tenure. For one-tier boards: All board members should be reported, including executive, independent and non-executive members. Disclosure Requirements Listed and/or publicly owned companies are required to provide links to public reports or corporate websites. Non-listed companies are required to provide the following evidence, depending on the type of company: - Family-owned companies and Privately owned companies are required to provide public reports, corporate websites, or internal documents. - Cooperatives are required to provide public reports, corporate websites, or internal documents. - State-owned companies are required to report on their corporate governance in the public domain as their key stakeholder is the general public. References Sterling Huang. Board Tenure and Firm Performance. INSEAD Business School. May 2013. Canavan, et al. Board tenure: How long is too long? Directors & Boards. 2004.
performance. Key Definitions Board Industry Experience: The member must have practical work experience in the industry (based on GICS 1 classification below). This experience can be acquired either by way of functions in management, academia, consulting, or research. 'Practical work experience' in the industry refers to experience attained in employee or executive roles. Having been on another company’s board in the same industry does not qualify as relevant experience, GICS Level 1 sectors: - Energy - Materials - Industrials - Consumer Discretionary - Consumer Staples - Healthcare - Financials - Information Technology - Communication Services - Utilities - Real Estate Executives and Employee Representatives: Board members who are executives or elected as employee representatives are not included. Data Requirements In this question, we expect disclosure on the number of independent or non-executive members of the board of directors with industry experience and/or disclosure on the industry experience of each individual board member. Two-tier board structures: this question should only include the supervisory board and not the management board. Disclosure Requirements Listed companies and/or publicly owned companies are required to provide links to public reports or corporate websites. Non-listed companies are required to provide the following evidence, depending on the type of company: - Family-owned companies and Privately owned companies are required to provide public reports, corporate websites, or internal documents. - Cooperatives are required to provide public reports, corporate websites, or internal documents. - State-owned companies are required to report on their corporate governance in the public domain as their key stakeholder is the general public. For companies in the FBN, TCD and IDD industries: if your company has very diversified operations or significant investments into businesses in industries other than the one used for the purpose of this assessment, board experience from another relevant industry can be accepted if an explanation is provided, clearly indicating the other GICS sector and how it relates to the company.

1.2.9 CEO Compensation - Success Metrics

This question requires publicly available information.

Does the company have predefined corporate performance indicators relevant for the Chief Executive Officer’s variable compensation and is it available publicly?

**Listed companies** are required to provide links to public reports or corporate websites. **Non-Listed companies** are required to provide internal documents and/or links to public reports or corporate websites.

- Yes, the company has predefined corporate performance indicators relevant for the Chief Executive Officer’s variable compensation. Please indicate where this information is available in [public reporting or corporate website](#).
  - **Financial Returns** (e.g. return on assets, return on equity, return on invested capital, etc.). Please list all metrics used for this category:
  - **Relative Financial Metrics** (e.g. comparison to peers using metrics such as total shareholder return, Tobin’s Q, growth, etc.). Please list all metrics used for this category:

- No, the company does not publicly report on corporate performance indicators for the Chief Executive Officer’s variable compensation.

- Not applicable. Please provide explanations in the comment box below.

- Not known

**Info Text:**

Question Rationale The use of financial metrics to evaluate management performance has become ubiquitous as the benefits of aligning incentives with company performance have been established. Our research shows that the use of revenue, operating profit, and EPS are common practices. Differentiation is now only observed in a few aspects, including the use of return metrics (capital efficiency) and relative metrics which compare the company to peers. In this question, we aim to find out which corporate performance indicators are used to determine CEO variable compensation. Please include only metrics applied to the CEO. Key Definitions Success metrics for variable CEO compensation: As part of this question, any corporate performance indicator that is used to determine the CEO’s variable compensation should be indicated. Please only include metrics that apply to the CEO's compensation, not metrics that are selectively used for other senior executives or
specialist senior managers at a lower level (such as CFO or COO). Financial metrics: Financial Returns refer to capital efficiency (capital is the source of funds, debt, equity, etc.). Therefore, Financial Returns always use an Income Statement profit metric (e.g., EBIT, income, operating income) divided by a Balance Sheet metric (e.g., Assets (entire balance sheet), Equity, Total Capital (debt plus equity), Invested Capital. We do not accept revenue growth, net profit after taxes, earnings per share, and dividends per share. Acceptable financial metrics include Return on Assets, Return on Equity, Return on Invested Capital. Data Requirements Please only include metrics that apply to the CEO's compensation, not metrics that are selectively used for other senior executives or specialist senior managers at a lower level (such as CFO or COO). Disclosure Requirements Listed and/or publicly owned companies are required to provide links to public reports or corporate websites. Non-listed companies are required to provide the following evidence, depending on the type of company: - Family-owned companies and Privately owned companies are required to provide public reports, corporate websites, or internal documents. - Cooperatives are required to provide public reports, corporate websites, or internal documents. - State-owned companies are required to report on their corporate governance in the public domain as their key stakeholder is the general public.

1.2.10 CEO Compensation - Long-Term Performance Alignment

This question requires publicly available information.

Does your company have the following compensation structures in place to align with long-term performance? Please indicate where this information is available:

Listed companies are required to provide links to public reports or corporate websites.
Non-Listed companies are required to provide internal documents and/or links to public reports or corporate websites.

☐ Yes, our company has guidelines on deferred bonus, time vesting, and performance period for the CEO's variable compensation.

 Deferral of Bonus for Short-term CEO Compensation
Is a portion of the CEO's short-term incentive deferred in the form of shares or stock options? Please indicate the percentage of the short-term bonus deferred in the form of shares or stock options:

 Performance Period for Variable CEO Compensation
What is the longest performance period applied to evaluate variable compensation (based on predefined targets, either relative or absolute), covered in your executive compensation plan? Is there a clawback policy in place? Please note that compensation that only is time vested is not considered as performance based compensation in this part of the question.
Please indicate the longest performance period covered by your executive compensation plan:

☐ We have a clawback provision in place. Please specify:

 Time Vesting for Variable CEO Compensation
Please indicate the longest time vesting period for variable CEO compensation:

☐ No, we do not have a performance-based variable compensation system or we do not report on this following the disclosure requirements of this question.

☐ Not applicable. Please provide explanations in the comment box below.

☐ Not known

Info Text:
Question Rationale Both financial and non-financial metrics are becoming increasingly important in determining variable compensation for executive management and more specifically the CEO. In this question, we assess time vesting and performance periods that are used for determining the CEO's variable compensation. A longer vesting period ensures that the interests of management and the long-term interest of shareholders are better aligned. Additionally, we assess if the short-term bonus is deferred in shares or stock options. The economic alignment of management with the long-term performance of the company is an essential component of executive compensation. This alignment can be achieved in several ways, including
deferral of short-term compensation, time vesting, and long-term performance periods. Alignment with long-term performance is particularly important during periods of short CEO tenure, as the risk of short-termism increases. For example, in 2009, CEOs of S&P 500 companies held their position for an average of just 7.2 yrs. This has subsequently increased to 10.8 years in 2015 as the economy recovered and turnover declined, but the risk of a reversion remains. (Matteo Tonello, The Conference Board, Inc., 2016). A longer vesting period ensures that the interests of management and the long-term interest of shareholders are better aligned. Key Definitions Deferred shares: refer to the percentage of the short-term bonus paid out in deferred shares instead of cash. The company can choose to pay out the annual short-term bonus in deferred shares to the CEO and other executive directors which is seen as a best practice. Deferred bonus compensation is an arrangement in which a portion of an employee’s income is paid out at a later date after which the income was earned during a set performance period. Performance period: This refers to a performance-based payout structure of variable compensation for the current period which is dependent on achieving targets in the following periods (x+1, x+2, x+3, etc.). Please note that option- and stock-based compensation for which the number of options or stocks rewarded is not dependent on future performance do not count as performance vesting but are considered as time vesting. Example: “The actual number of shares that may become earned and payable under the awards will generally range from 0% to 200% of the target number of units based on achievement of the specified goals over a two-year period.” A clawback provision: a policy that allows a company to recover performance-based compensation for some period of time after compensation awards are granted. Clawback provisions may apply to short and/or long-term awards. The circumstances and conduct that would trigger clawback provisions include, but are not limited to, restatement of financial results, errors in financial information reported, misconduct by the employee directly, or misconduct by any other employee that results in incorrect financial reporting. Time vesting: refers to time-based pay-out structures of variable compensation for the current period over the coming years (x+1, x+2, x+3, etc.). The amount of future payout is independent of the coming year's performance. If all long-term incentives are based on future performance, the same figure should be given for the longest performance period and the longest time vesting period. We accept the total number: the sum of the vesting period and the required holding period. Exceptions to the Standard Methodology for Non-Listed companies: The definition of shares includes non-tradable stock and phantom/synthetic shares that replicate the company’s share practice performance. Phantom/synthetic shares: A phantom stock is an employee benefit plan that gives selected employees (senior management) many of the benefits of stock ownership without actually giving them any company stock. This is sometimes referred to as shadow stock. Phantom stock, also known as synthetic equity, has no inherent requirements or restrictions regarding its use, allowing the organization to use is however it chooses. Data Requirements In this question, we assess the time vesting and performance periods as well as whether the company has a clawback provision in place. In addition, we assess if the short-term bonus is deferred in shares or stock options. The question applies to CEO compensation only. Disclosure Requirements Listed and/or publicly owned companies are required to provide links to public reports or corporate websites. Non-listed companies are required to provide the following evidence, depending on the type of company: - Family-owned companies and Privately owned companies are required to provide public reports, corporate websites, or internal documents. - Cooperatives are required to provide public reports, corporate websites, or internal documents. - State-owned companies are required to report on their corporate governance in the public domain as their key stakeholder is the general public.

1.2.11 Management Ownership

Additional credit may be granted for publicly available evidence.

Do your company’s CEO and other executive committee members hold company shares? Please note that the shares included in the calculation should not be hedged or the personal financial risk of holding the shares otherwise removed.

- Yes, company CEO and other executive officers hold company shares
<table>
<thead>
<tr>
<th>Position</th>
<th>Name(s)</th>
<th>Multiple of base salary</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Chief Executive Officer</strong></td>
<td>Please provide supporting evidence:</td>
<td></td>
</tr>
<tr>
<td>❏ For <strong>Listed companies</strong>:</td>
<td>The information is publicly available. Please provide link to public reports or corporate website.</td>
<td></td>
</tr>
<tr>
<td>❏ For <strong>Non-Listed companies</strong>:</td>
<td>The information is available in internal documents, public reports or corporate website.</td>
<td></td>
</tr>
<tr>
<td><strong>Average across other executive committee members owning shares</strong></td>
<td>Please provide supporting evidence:</td>
<td></td>
</tr>
<tr>
<td>❏ For <strong>Listed companies</strong>:</td>
<td>The information is publicly available. Please provide link to public reports or corporate website.</td>
<td></td>
</tr>
<tr>
<td>❏ For <strong>Non-Listed companies</strong>:</td>
<td>The information is available in internal documents, public reports or corporate website.</td>
<td></td>
</tr>
</tbody>
</table>

- No, company CEO and other executive officers do not hold company shares.
- Not applicable. Please provide explanations in the comment box below.
- Not known

**Info Text:**

Question Rationale: As corporate governance systems aim to ensure that a company is managed in the interests of its shareholders, in this question we assess whether the company’s CEO and other executive officers have stock ownership. Academic research suggests that stock ownership by senior management is positively correlated to financial performance. Key Definitions: Shares: Shares are units of equity ownership in a corporation. In this question, we don’t only accept publicly traded shares but also other forms of participation in equity ownership. Economic interest in shares held: the shares included in the calculation should not be hedged or the personal financial risk of holding the shares otherwise removed. Data Requirements: The question assesses the stock ownership level of the CEO and of the other member of the executive committee compared to their respective base salary. Chief Executive Officer: Base salary and shareholdings of the Chief Executive Officer or shareholding expressed multiple of the CEO base salary. Other Executive committee members: Base salary and shareholdings of at least two members of the executive committee or average shareholdings of the executive committee expressed as multiple of base salary. Please note that the metrics need to be reported for each named executive individually (a consolidated figure is not sufficient). Additional credit will be granted for public reporting of the following parts of the question: - CEO’s shares as a multiple of base salary - Average across other executive committee members owning shares as a multiple of base salary Disclosure requirements for partially public question: For listed companies, if no public documentation is provided, internal documentation should be provided that includes the base salary and shareholdings reported as well as the calculations. For non-listed companies, internal documents are generally accepted. Calculations: CEO multiple calculation: Share price at the end of the FY * number of shares held by the CEO / base salary of CEO Other executives’ multiple calculation: (share price at the end of the FY * number of shares held by the executive 1 / base salary of executive) + (share price at the end of the FY * number of shares held by the executive 2 / base salary of executive) + (…) / number of executives with shareholdings reported For US-based companies, please use the share price at the time of the shareholder meeting, and the salary and number of shares held at that time for the purpose of calculations. References: Academic research (e.g., Bhagat...
1.2.12 Management Ownership Requirements

This question requires publicly available information.

Does your company have specific stock ownership requirements for the CEO and other members of your executive committee? Please indicate where this information is available:

- **Listed companies** are required to provide links to public reports or corporate websites.
- **Non-Listed companies** are required to provide internal documents and/or links to public reports or corporate websites.

- Yes, there are specific requirements in place. Please indicate at which levels this exist and indicate the share ownership requirements as a multiple of the annual base salary.
  - The CEO has to build up a share ownership of __ __ __ __ times the annual base salary
  - Other members of the executive committee besides the CEO have to build up a share ownership of __ __ __ __ times the annual base salary

- No, there are no share ownership requirements or we do not report on this following the disclosure requirements of this question.

- Not applicable. Please provide explanations in the comment box below.

- Not known

**Info Text:**

**Question Rationale**
As corporate governance systems aim to ensure that a company is managed in the interests of its shareholders, in this question we assess whether there are stock ownership guidelines in place for the company's CEO and other executives. Academic research (e.g., Bhagat and Bolton 2008) suggests that stock ownership by senior management is positively correlated to future operating profit. Data Requirements: The question assesses if there are explicit requirements indicating that the CEO and/or other executive managers are required to build up share ownership equivalent to a specific multiple of their annual base salary. Disclosure Requirements: Listed and/or publicly owned companies are required to provide links to public reports or corporate websites. Non-listed companies are required to provide the following evidence, depending on the type of company: - Family-owned companies and Privately owned companies are required to provide public reports, corporate websites, or internal documents. - Cooperatives are required to provide public reports, corporate websites, or internal documents. - State-owned companies are required to report on their corporate governance in the public domain as their key stakeholder is the general public. Exceptions to the Standard Methodology for Non-Listed companies: The definition of shares includes non-tradable stock and phantom/synthetic shares that replicate the company's share practice performance. Phantom/synthetic shares: A phantom stock is an employee benefit plan that gives selected employees (senior management) many of the benefits of stock ownership without actually giving them any company stock. This is sometimes referred to as shadow stock. Phantom stock, also known as synthetic equity, has no inherent requirements or restrictions regarding its use, allowing the organization to use as however it chooses. References: Academic research (e.g., Bhagat and Bolton 2008) shows that stock ownership of senior management is positively related to future operating profit. Others: - Core & Larcker (2000). Performances consequences of mandatory increases in executive stock ownership. - Gugler, Mueller, & Yurtoglu (2008). The Effects of Ownership Concentration and Identity on Investment Performance: An International Comparison


Created by S&P Global, on 06 May 2024 15:25
1.2.13 Government Ownership

This question requires publicly available information.

Please indicate whether individual governmental institutions own more than 5% of the total voting rights of your company and if yes, whether golden shares exist for them. Government ownership of 5% or less of the voting rights need not be reported. Please also indicate where this information is available. For additional information, please see the information button.

**Listed companies** are required to provide links to public reports or corporate websites.

**Non-Listed companies** are required to provide internal documents and/or links to public reports or corporate websites.

- Yes, individual governmental institutions have more than 5% of the voting rights.
  - Please provide the total percentage of government ownership (sum of % of individual governmental institutions owning more than 5% of voting rights)

  
  Please provide details for the government ownership (e.g. calculation, members, organizations etc. if available):

- Golden Shares for Governmental Institutions
  - Does your company have golden shares for governmental institutions?
    - Yes, our company has golden shares for governmental institutions.
    - No, our company doesn't have any golden shares for governmental institutions.

- No governmental institutions own more than 5% of the total voting rights. Please provide available evidence of the company share ownership structure.

- No, we do not report on government ownership information following the disclosure requirements of this question.

- Not applicable. Please provide explanations in the comment box below.

- Not known

**Info Text:**

Question Rationale: As corporate governance systems aim to ensure that a company is managed in the interests of its shareholders, in this question we assess if a government has voting rights of more than 5% and has golden shares in the company. Academic research (e.g., Goldeng et. al., 2008 or Chen et. al., 2017) suggests that companies without government ownership perform better than companies with government ownership.

Key Definitions:

**Government Ownership:** For the definition of government institutions and ownership, we adopt the Organization for Economic Co-operation and Development (OECD) definition (2005): “Enterprises where the state has significant control through full, majority, or significant minority ownership. In this definition, we include state-owned enterprises (SOEs) which are owned by the central or federal government, as well as SOEs owned by regional and local governments.” This definition includes Government pension funds, state asset management funds, development banks (federal and local), and sovereign wealth funds.

**Golden Shares for Governments:** A type of share that gives its shareholder veto power over changes to the company's charter. A golden share holds special voting rights, giving its holder the ability to block another shareholder from taking more than a ratio of ordinary shares.

Data Requirements:

- Government ownership requirements: Holding companies that own stakes higher than 5% in other companies, and in turn are majority owned by a government or governmental institutions should be reported in this question. For example, a holding company (Company A) is 70% government owned. Company A owns 40% of the voting rights in Company B. Company B should report 40% government ownership in this question. In this question, we expect information on:
  - Total percentage of government ownership (sum of % of individual governmental institutions owning more than 5% of voting rights) or disclosure of all individual governmental institutions owning more than 5% of voting rights.
  - Golden shares for governmental institutions (only if the corresponding option is marked).

Disclosure Requirements:

- Listed and/or publicly owned companies are required to provide links to public reports or corporate websites.
- Non-listed companies are required to provide the following evidence, depending on the type of company:
  - Family-owned companies and Privately owned companies are required to provide public reports, corporate websites, or internal documents.
  - Cooperatives are required to provide public reports, corporate websites, or internal documents.
  - State-owned companies are required to report on their corporate governance in the public domain as their key stakeholder is the general public.

References:


1.2.14 Family Ownership

This question requires publicly available information.

Please indicate whether one or several founding individuals or family members, personally or through other companies or organizations, individually have more than 5% of the voting rights of your company. Please also indicate where this information is available. For additional information, please see the information button. Listed companies are required to provide links to public reports or corporate websites. Non-Listed companies are required to provide internal documents and/or links to public reports or corporate websites.

- Yes, founding individuals or family members individually own more than 5% of the voting rights.
  Total % of voting rights of the company:
  _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _
  Please provide details for the individual/family ownership (e.g. calculation, members, organizations etc. if available):
  _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _

- No, founding individuals or family members individually do not have more than 5% of the voting rights.

- Not applicable. Please provide explanations in the comment box below.

- We do not report on family ownership following the disclosure requirements of this question.

- Not known

Info Text:

Question Rationale As corporate governance systems aim to ensure that a company is managed in the interests of its shareholders, in this question we assess if one or several individuals of the founding family are ultimate owners and have more than 5% of the voting rights. Academic research (e.g., Eugster & Isakov, 2016 or Corstjens, Peyer & Van der Heyden, 2006) suggests that family ownership is positively correlated to future operating profit. Key Definitions Significant family ownership: At least one of the founding individuals/family members, personally or through other companies or organizations, must own more than 5% of the voting rights of your company. If no individual owns more than 5%, we do not consider it significant family ownership. Founding family: The founding family can be one or several individuals or family members. They might have not necessarily set up the company independently. In case a family acquires an existing company and transforms it into a new company, this second family can be considered the ‘founding family’ (e.g., if a company has been acquired, re-named, and re-branded). Data Requirements We are looking for founding family ownership, in order to assess whether descendants of the founding families are current owners with significant voting rights. Total % of voting rights of founding family members, personally or through companies/organizations to be reported: - if one of the family members owns more than 5%, the respondent shall report the total of all family members' holdings, e.g., add the person(s) with individual ownership of over 5% of the voting rights plus those who individually own less than 5% of voting rights. Please report the total even if there is no pooling agreement in place. - if the family owns more than 5% of the company through a holding company, the family must own at least 50% of the holding company that in turn holds shares of the company. - if none of the family members individually own more than 5% of the company's voting rights, please mark "No, (founding) family members individually do not have more than 5% of the voting rights." - If any of the founding members or their families still hold more than 5%, this should be reported. - if the company was not founded by a family, please mark "Not applicable". Specific data requirements for non-listed companies - For family-owned companies, the distribution of voting rights can also be evaluated if there are no publicly traded shares, as there exist other types of shares/instruments that correspond to voting rights. Disclosure Requirements Listed and/or publicly owned companies are required to provide links to public reports or corporate websites. Non-listed companies are required to provide the following evidence, depending on the type of company: - Family-owned companies and Private-owned companies are required to provide public reports, corporate websites, or internal documents. - Cooperatives are required to provide public reports, corporate websites, or internal documents. - State-owned companies are required to report on their corporate governance in the public domain as their key stakeholder is the general public. References - Credit Suisse (2017), The CS Family

1.2.15 CEO-to-Employee Pay Ratio

Additional credit may be granted for publicly available evidence.

Please provide the annual compensation for the Chief Executive Officer and the median of the annual compensation of all other employees as well as the ratio between the two. If you are unable to provide the median, please provide figures for total mean compensation and the ratio using the mean. The currency provided should remain consistent for all figures.

<table>
<thead>
<tr>
<th>CEO Compensation</th>
<th>Total CEO Compensation</th>
<th>Mean Employee Compensation</th>
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<tr>
<td>Employee Compensation</td>
<td>Median Employee Compensation</td>
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</table>

Please indicate the total annual compensation of the Chief Executive Officer (or any equivalent position):

Total compensation includes fixed and variable compensation as well as all other parts of compensation which are required to be included in total remuneration reporting according to national accounting standards.

Please indicate either median or mean annual compensation of all employees, except the Chief Executive Officer (or any equivalent position):

The ratio between the total annual compensation of the Chief Executive Officer and the mean or median employee compensation:

CEO compensation divided by the mean or median employee compensation

The currency used in the table:

Public Reporting

- For Listed companies: The information is publicly available. Please provide link to public reports or corporate website.
- For Non-Listed companies: The information is available in internal documents, public reports or corporate website.

- We do not track the ratio of the median or mean employee compensation or the total annual compensation of the Chief Executive Officer.
- Not applicable. Please provide explanations in the comment box below.
- Not known

Info Text:

Question Rationale In the aftermath of the global financial crisis, many countries have implemented or are planning to implement reforms regarding the transparency of executive compensation. Transparency is vital to restore trust among shareholders, employees, customers and other stakeholders, and hence to
improve corporate reputation. Companies that are taking a proactive approach to align their reporting with this global trend and improve disclosure about executive compensation will be in a better position to fend off criticisms than those that are not. In addition to complying with new regulations, transparent reporting on CEO compensation and the mean or median compensation of other employees provides a basis for understanding the "pay gap" and addresses concerns from investors and stakeholders whether executive compensation is justified. In this question, we assess whether companies (including non-US-based companies) are able to disclose this information. The Dodd-Frank Wall Street Reform and Consumer Protection Act (Pub.L. 111-203, H.R. 4173) is a federal statute in the United States that was signed into law by President Barack Obama on July 21, 2010. The Dodd-Frank Act clearly states that, in terms of CEO compensation disclosure, a company will be obliged to disclose to the shareholders: the median of the annual total compensation of all employees of the issuer, except the chief executive officer (or any equivalent position), the annual total compensation of the chief executive officer, or any equivalent position, and the ratio of the amount of the median of the annual total with the total CEO compensation. Key Definitions Salary: It is defined here as the total annual compensation including all bonuses but excluding pension benefits and fringe benefits. Total annual compensation: It is defined here as the total compensation including all bonuses but excluding pension benefits and fringe benefits. Median of the total annual compensation of all employees: It is defined according to the general mathematical definition of median: the median of a sequence is the middle number when sorting all numbers from low to high. This is different from the mean of the total annual compensation of all employees since the mean of a sequence of numbers is calculated by adding up all the numbers in a sequence and dividing this total by the number of entries in the sequence. In this question, either the median or the mean may be provided; it is not necessary to provide both. The ratio should be calculated as the Total CEO Compensation divided by the Median OR Mean employee compensation (i.e., the reported figure should be the multiple of the employee compensation). Data Requirements While we expect the figure to cover the entirety of a company's global operations, for this question, companies may make cost-of-living adjustments to the compensation of employees residing in a jurisdiction different from that of the CEO, provided that these adjustments are applied to all such employees included in the calculation, and that these adjustments are explained in the company comment section, and the raw, unadjusted data is also provided in the company comment section. Disclosure requirements for partially public question. For Listed companies: Additional credit will be granted for relevant publicly available evidence covering one of the following aspects of this question: - Annual compensation of Chief Executive Officer and median (mean) annual compensation of all employees except the Chief Executive Officer (or any equivalent position). - Ratio between the total annual compensation of the Chief Executive Officer and the median (mean) employee compensation. For Non-Listed companies: internal documents covering the above-mentioned information are generally accepted. References The Dodd–Frank Wall Street Reform and Consumer Protection Act (Pub.L. 111-203, H. R. 4173), www.gpo.gov/fdsys/pkg/BILLS-111hr4173enr/pdf/BILLS-111hr4173enr.pdf (p. 529)

1.2.16 MSA Corporate Governance

In this section we include a performance score on the Corporate Sustainability Monitoring with the objective to verify the company's involvement and management of crisis situations that can have a damaging effect on reputation. The evaluation will be filled in by the responsible analyst of your industry. No additional information is required from your company.

Info Text:
Based on a Media and Stakeholder Analysis (MSA), the consistency of a company's behavior and management of crisis situations is reviewed in line with its stated principles and policies. Results of the MSA range from no impact to high impact - the latter reflecting serious reputational risks with consequences on the company's bottom line (e.g., legal liabilities or high probability of imminent legal liabilities). In addition, the overall quality of the management response to a situation is assessed, evaluating whether a company has transparently and proactively managed the issue.

1.3 Materiality
This criterion aims to assess the company's ability to identify sustainability factors that are relevant for long-term value creation, considering the interrelation between external impact on society or the environment on the one hand and internal impact on enterprise value on the other hand. It therefore considers the dual nature of materiality, also referred to as double materiality. Investors are increasingly interested in both sides of this equation. The same holds for regulations across the world, who are requiring reporting on this broader and integrated understanding of materiality.

A sustainability issue is seen as material if it presents a significant impact on society or the environment and might have a significant impact on a company's value drivers, competitive position, and long-term shareholder value creation. Material ESG issues can significantly affect an entity's business operations, cash flows, legal or regulatory liabilities, and access to capital. They can also significantly improve or undermine an entity's reputation and relationships with key stakeholders, society and the environment. Over time external impacts on society and environment translate into internal impact on a company itself, including its financial value drivers.

1.3.1 Materiality Analysis

This question requires publicly available information.

Does the company disclose details of its materiality determination process and how the materiality analysis is conducted, and is this information available publicly?

- Yes, the company has disclosed its materiality analysis process. Please indicate where this information is available in public reporting or corporate website.
  - Material analysis conducted/reviewed:
    - At-least annually
    - Once every 2 or more years
    - Not known
  - Involvement of external stakeholders in identifying the material issues
  - Material Issues are prioritized in a materiality matrix or any other form
  - Materiality assessment integrated in company's ERM process
  - Assessment conducted is based on the principle of double materiality or considers internal impact on the business as well as external impact on society and the environment
  - Materiality assessment process verified by a third-party assurance provider
  - Materiality assessment results signed off by:
    - Board of Directors
    - Senior Management

- No, the company does not publicly report on its materiality analysis process.

- Not applicable. Please provide explanations in the comment box below.

Info Text:

Question Rationale The purpose of this question is to assess the extent to which companies are disclosing the details related to their materiality process. We are looking for the following evidence in the public domain: 1. Frequency of conducting or reviewing materiality analysis 2. Involvement of external stakeholders in identifying the material issues 3. Prioritization of material issues in a materiality matrix or any other form 4. Integration of materiality assessment in the company's enterprise risk management 5. Assessment conducted is based on the principle of double materiality, i.e., considers internal impact on the business as well as external impact on society and the environment 6. Materiality assessment process is verified by a third-party assurance provider 7. Materiality assessment results are signed off by either board of directors or senior management

Key Definitions

Materiality: Any factor that can have a present or future impact on value creation and therefore the financial performance of the company over time. These could be economic, environmental, or social in nature.

Internal impact: impact on the entity's business operations, cash flows, legal or regulatory liabilities, and
access to capital. It can also be perceived as an improvement or undermaintain of an entity’s reputation and relationships with key stakeholders, society, and the environment. External impact: direct and indirect damage or benefits to societal stakeholders and the environment by the company’s business activities, business model, products, and services, both in the short and longer term. Materiality Assessment: A materiality assessment is an approach to identify critical economic, environmental, and social issues which have a significant impact on the company’s business performance. Materiality Assessment Frequency: We expect companies to conduct/review materiality assessment and to report the results in at least one of the two most recent Annual or Sustainability reports. Data Requirements Copy of or link to the Company website, annual report, sustainability report, or other public communication 1. Materiality analysis conducted/reviewed: Our expectations - Public disclosure on the frequency of materiality analysis conducted or reviewed. The information should be available in at least one of the two most recent Annual or Sustainability reports Not acceptable: - Reference to previous public reports for materiality analysis which are more than 2 years old 2. Involvement of external stakeholders: Our expectations: - Whether external stakeholders are involved in the materiality analysis process should be clearly available in the company’s public documents/website. - Information should be available in the section where materiality analysis has been discussed Not acceptable: - Only stating that stakeholders are involved without any reference to the type, i.e., external or internal stakeholders - General stakeholder engagement information without any reference to how it is integrated with the materiality assessment process is not acceptable 3. Prioritization of material issues: Our expectations: - Material issues should be publicly disclosed and prioritized either in a matrix format or any other priority listed format Not acceptable: - Only stating that a materiality determination/prioritization process has been done without disclosing the top material issues. 4. Integration of materiality assessment results in enterprise risk management (ERM): Our expectations: - Public disclosure on the integration of materiality assessment results within the overall risk management process - Description of how identified material issues are linked with the company’s significant risks Not acceptable: - General disclosure on ESG-related risks without specifying the linkage with materiality assessment results - ERM results used as inputs to materiality process 5. Assessment conducted is based on the principle of double materiality, i.e., considers internal impact on the business as well as external impact on society and the environment Our expectations: - Indication of considering external and internal impacts on the materiality assessment process - A materiality matrix depicting both: the impact of the company’s business activity on society, the environment, and people and the internal impact on the business. Not acceptable: - General disclosure on impact valuation analysis without reference to its link with identified material issues 6. Materiality assessment process verified by third-party assurance provider: Our expectations: - Public disclosure on assurance report clearly specifying audit of materiality assessment covered in its scope - A statement specifying external assurance of the materiality assessment process Not acceptable: - Disclosure of the involvement of an external consultant in the materiality assessment process - Assurance statement without a clear indication of materiality assessment under its scope 7. Materiality assessment metrics signed off by the Board of directors or Senior Management: Our expectations: Review, sign-off, approved, and oversight of materiality assessment process by: - the board of directors, a sub-committee of the board of directors, or a single named director OR - an executive manager/executive committee - The materiality assessment results are signed by the respective board/executive representative(s)/ - A general statement specifying sign-off/approval of materiality assessment result is also sufficient Not acceptable: - Executive manager/sustainability manager involvement in the materiality assessment process Disclosure Requirements - The document(s) you attached will be used to verify your response. - The supporting documents need to be available in the public domain. - Any response that cannot be verified in the attached public document(s) or web link will not be accepted. References The double-materiality concept Application and Issues - GRI EU Guidelines on non-financial Reporting directive – 2.2 (2019) Corporate Sustainability Reporting Directive (CDRD) Double Materiality Guidelines - EFRAG The Two Dimensions of ESG Materiality - S&P Statement-of-Intent-to-Work-Together-Towards-Comprehensive-Corporate-Reporting.pdf (sasb.org) – CDP, CDSB, GRI, IIRC and SASB

1.3.2 Material Issues for Enterprise Value Creation

This question requires publicly available information.

Does the company conduct materiality analysis to identify the three most important material issues (economic, environmental, or social) that have the greatest impact on the business, report on how these issues impact the business and serve as significant determinants of long-term value creation, and are these information available publicly?
Yes, the company conducts materiality analysis to identify key issues for long-term value creation. Please indicate where this information is available in public reporting or corporate website.

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<th>Material Issue 1</th>
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<td>Please select the category your material issue belongs to:</td>
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Business Case
Please provide a brief rationale for why this issue is material to your business:

- We report our business case for this material issue: [ ]
- We report our business case for this material issue: [ ]
- We report our business case for this material issue: [ ]
Material Issue 1 | Material Issue 2 | Material Issue 3
--- | --- | ---
Business Impact
Please select the type of impact this material issue has on your business (cost/revenue/risk):
- Cost
- Revenue
- Risk

Business strategies
Please specify your primary business strategies, initiatives or products that address this issue:
- Yes, we describe our strategy for addressing the impact on the business:
- Yes, we describe our strategy for addressing the impact on the business:
- Yes, we describe our strategy for addressing the impact on the business:

- No, the company does not publicly report on its material issues.
- Not applicable. Please provide explanations in the comment box below.

Info Text:
Question Rationale Leading companies are increasingly focusing on the most material topics that drive their long-term value creation. These issues can cover economic, environmental, and social issues, and they are key drivers for a company's long-term business performance. The question assesses whether companies have conducted a materiality analysis of the most important issues driving long-term value creation and whether they are able to convincingly link these issues to their business performance. Companies are asked to make a business case and therefore should focus on those economic, environmental, or social issues that are most important or impactful for the business performance of the company. Companies should indicate which of the three value drivers are impacted by these issues (revenues, costs, or risk), and what strategies, products, or initiatives the company has that are linked to these issues. Key Definitions Material Issue: A material issue is a sustainability factor that can have a present or future impact on the company's value drivers, competitive position, and therefore on long-term shareholder value creation. Materiality Assessment: A materiality assessment is an approach to identify critical economic, environmental, and social issues which have a significant impact on the company's business performance. Materiality Assessment Frequency: We expect companies to conduct a materiality assessment and to report the results in at least one of the two most recent Annual or Sustainability reports. Data Requirements
1. Material Issue Our expectations: - Companies have conducted a materiality analysis and identified the most important issues driving long-term performance.
   - Companies clearly define the three most material economic, environmental, or social issues driving long-term value creation. Not acceptable: - Purely financial metrics/issues (net profit, cash flow, earnings per share, product sales). - Operational business metrics/issues (e.g., market expansion, efficient use of capital, operational excellence). - General issues without a description of the specific sub-issues that might impact the company's performance (e.g., macroeconomic conditions, long-term shareholder value). Please note that companies that do not provide an acceptable material issue do not receive points for any of the sub-questions related to that material issue.
2. Business Case Our expectations: The business case should contain the following information: - A clear link between the material issue and the business case. - Clear explanation of why the issue is material to the company’s performance in terms of cost/revenue/risk (e.g., cost savings, revenue generation, operational risks with direct impact on financial performance). Not acceptable: - The business case is not linked to the material issue. - The business case does not link the material issue to the company’s performance in terms of costs, revenues, or risks. - The business case is describing the material issue and its importance for the society/environment but does not provide information on why the issue is relevant to the company’s performance (e.g., impact of global warming on society).
3. Business Strategies Our expectations: - The company provides a clear explanation of the strategies, initiatives, or products or services through which it addresses the material issue. Not acceptable: - Strategies, initiatives, or products or services that do not directly address the material issue. - Strategies that are not clearly described (e.g., human resources-oriented management). - Description of the current situation without providing the strategies or products to address this situation. - Provision of a target instead of a strategy, initiative, or product (e.g., zero fatalities or injuries). Disclosure Requirements - The document(s) you attached will be used to verify your
1.3.3 Materiality Metrics for Enterprise Value Creation

This question requires publicly available information.

Do you have targets or metrics linked to the top three material issues and disclose progress towards these? Do you link executive compensation with the targets or metrics involved? Please specify where the information is available in public reporting.

- Yes, we do have targets or metrics linked to the top three material issues and report them publicly

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<th>Material Issue 1</th>
<th>Material Issue 2</th>
<th>Material Issue 3</th>
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</thead>
<tbody>
<tr>
<td>Material Issue Please specify your material issue: (The issues should be same as marked in the question Material Issues)</td>
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</tbody>
</table>

- Target/Metric Do you have a target or metric to measure your progress on this issue in a systematic way? Please specify where this target or metric is available in public reporting:

<table>
<thead>
<tr>
<th>Target/Metric</th>
<th>Target set linked to material issue:</th>
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<th>Target set linked to material issue:</th>
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- Target Year Please specify the year for the target

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<tr>
<th>Target Year</th>
<th>Target year specified:</th>
<th>Target year specified:</th>
<th>Target year specified:</th>
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</table>

- Progress Do you disclose the progress on targets/metrics. Please specify where this target or metric is available in public reporting:

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<tr>
<th>Progress</th>
<th>Progress on target specified:</th>
<th>Progress on target specified:</th>
<th>Progress on target specified:</th>
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</table>

- Executive Compensation Is this metric or target used to determine the compensation of executive committee member(s)? If yes, please specify how this metric is used and provide a relevant public reference showing how these metrics are applied to executive compensation.

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<thead>
<tr>
<th>Executive Compensation</th>
<th>Target/metric linked to executive compensation</th>
<th>Target/metric linked to executive compensation</th>
<th>Target/metric linked to executive compensation</th>
</tr>
</thead>
</table>

- No, we do not disclose targets/metrics linked to top 3 material issues.
- Not applicable. Please provide an explanation in the comment box below.

Info Text:

Question Rationale The purpose of this question is to assess the extent to which companies are disclosing their progress toward established targets or metrics linked to material issues. In order to ensure that the company...
is managing its performance in relation to the top material issues identified over the long term, the question asks which targets/metrics the company uses to measure its performance over time and whether the company has linked its executive compensation to these issues. Data Requirements 1. Material Issue: Our expectations: - Companies have conducted a materiality analysis and identified the most important issues driving long-term performance. - Companies clearly define the three most material economic, environmental, or social issues driving long-term value creation. - The material issues should be the same as identified in question 1.3.2 Not acceptable: - Purely financial metrics/issues (net profit, cash flow, earnings per share, product sales). - Operational business metrics/issues (e.g., market expansion, efficient use of capital, operational excellence). - General issues without a description of the specific sub-issues that might impact the company’s performance (e.g., macroeconomic conditions, long-term shareholder value). Please note that companies that do not provide an acceptable material issue do not receive points for any of the sub-questions related to that material issue. 2. Target/Metric: Our expectations: - The metric or target is linked to the material issue and should be available publicly. - Both long-term (at least 3 or more years) and short-term targets are acceptable. - The metric or target and how it is being used are clearly described. Target set in the past year is acceptable if: - If the company’s target is by necessity, ongoing, (such as zero fatalities) please indicate the current year as the target year and explain in the company comment section. - The current reporting year (e.g., 2021) corresponds to the target’s finishing year. - If the company publishes its report biannually or the company’s reporting does not match with CSA assessment cycle. Not acceptable: - Targets/metrics are not linked to the material issue. - Vague targets or targets whose progress cannot be measured (e.g., ensure a good working environment, reduce workplace accidents). - Targets set in the past year and are not valid anymore. 3. Target Year: Our expectations: - The target year should be available in the public domain. Indicating the current reporting year as the target year is acceptable if: - If the company’s target is by necessity, ongoing, (such as zero fatalities) please indicate the current year as the target year and explain in the company comment section. Indicating past reporting years as target year is acceptable if: - If the company’s long-term target is by necessity, ongoing, (such as zero fatalities) please indicate the current year as the target year and explain in the company comment section. - The current reporting year (e.g., 2021) corresponds to the target’s finishing year. - If the company publishes its report biannually or the company’s reporting does not match with CSA assessment cycle. 4. Executive Compensation: Our expectations: - The metric or target used for determining executive compensation is clearly defined and linked to the material issue. It should also be available publicly. - Executive compensation is linked to the performance on the material issue, metric, or target. - There is a clear indication that the performance on the provided material issue, target, or metric is linked to the compensation of the executive management, not only of the respective line managers. Not acceptable: - The executive compensation is linked to the company’s general CSR policy or the company’s environmental performance. - The metric/target is used for determining management performance but there is no explanation of how performance is linked to executive compensation. - The metric/target indirectly contributes to the company’s general financial performance metrics (e.g., executive compensation is linked to EBIT, as improved operational eco-efficiency reduces operational costs and therefore increases EBIT). - For additional information, please check our webcast on this topic. Disclosure Requirements - The document(s) you attached will be used to verify your response. - The supporting documents need to be available in the public domain. - Any response that cannot be verified in the attached public document(s) or web link will not be accepted.

1.3.4 Material Issues for External Stakeholders

Additional credit may be granted for publicly available evidence.

Has your company conducted a materiality analysis to identify and value the positive/negative impact on external stakeholders associated with your company’s business operations, products/services and/or its supply chain? Please indicate two material issues that illustrate the most significant social or, environmental impact on external stakeholder groups (e.g. environment, society, customers, etc.). Note that philanthropic initiatives or project-based Environmental and Social Impact Assessments (ESIA, EIA) are not accepted in this question.

☐ Yes, our company conducted an assessment of positive and/or negative impacts on external stakeholders resulting from our business operations, products & services and/or supply chain.

Please provide supporting evidence:
### Material Issue for External Stakeholders
Please specify the material issue that generates a positive/negative impact on external stakeholders.

Please select the category your external impact belongs to:
- Corporate Governance & Ethics
- Cyber Security
- Policy Influence
- Risk & Crisis Management
- Supply Chain Management
- Tax Strategy
- Sustainable Raw Materials
- Biodiversity
- Climate Transition & Physical Risks
- Environmental Policy & Management
- Energy
- Waste & Pollutants
- Water
- Society & Community Relations
- Customer Relations
- Occupational Health & Safety
- Labour Practices
- Human Capital Management
- Human Rights
- Privacy Protection
- Product / Service Quality & Safety
- Sustainable Products & Services

### Cause of the Impact
Please specify which part of your business is responsible for the external impact and the coverage of the business activity that has been considered in the assessment.

Business value chain:
- Operations
- Products/Services
- Supply chain

Business activity coverage:
- >50% of business activity
- <50% of business activity
- Not known

### External stakeholder(s)/impact area(s) evaluated
Please select the stakeholder(s) group or impact areas evaluated.

- Environment
- Society
- Consumers/end-users
- External employees (e.g. supply chain, contractors)

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Question Rationale: The purpose of this question is to recognize companies that identify and value the externalized impact generated on societal stakeholder groups and/or the environment as a result of their main business activities. The impact evaluated usually relates to environmental and/or social externalities that can be either positive (external benefits) or negative (external costs), intended or unintended. The impacts generated can be direct or indirect and are usually not internalized as part of the costs associated with the business activity. While companies have made significant progress in tracking and reporting input and output measures (such as water use and CO2 emissions), the external social and environmental impacts resulting from business operations, products, services or supply chain operations are significantly under-reported.

Impact valuation helps companies to increase awareness of externalities associated with their business and represents a management tool to orient the company strategy towards sustainable activities, solutions, and sourcing. Investors are also interested in how companies measure and understand their own impacts, and how those companies use that information in their internal decision-making so that it leads to long-term value creation. Over time, external impact on society and the environment also translates into internal impact on a company itself, including its financial value drivers. In a broader understanding of enterprise value today, including stakeholder perspectives, the interrelation between external and internal impact is a core part of determining materiality. Key Definitions:

- Material issue for external stakeholders: The material significance of an ESG subject in terms of external impact is defined through an analysis of a company’s business activities, business model, products, and services. Impacts are evaluated considering the direct and indirect impacts on societal stakeholders and/or the environment, both in the short and longer term. The material issues for external stakeholders and associated impact are usually identified by evaluating the breadth of the impact, looking at the size of the effect on societal stakeholders and the environment, as well as the depth of the impact, looking at the severity and extent of the damage or benefits it causes to societal stakeholders and the environment. Cause of the impact: This refers to the company’s business activity in terms of operations, products/services, or supply chain activities which are responsible for causing the external impact. The coverage associated with the business activity refers to the share of company operations, products/services, or supply chain considered as part of the impact evaluations. External stakeholders/impact areas evaluated: This refers to the type of external stakeholder group or an external area experiencing the impact caused by the company through its business activities. External groups or areas include the environment, society, consumers/end-users, and external employees (supply chain, contractors). It is possible to consider the impact on several areas or groups, e.g., environment and society or, environment, consumers and society, etc. As the question is assessing material issues for external stakeholders, internal stakeholders, such as employees or shareholders, are not acceptable.

Topic relevance on external stakeholders: Please provide a brief rationale why the external impact assessed is material to external societal stakeholders or the environment. Also indicate the type of impact assessed along with public disclosure, if available.

- Materiality of externalized impact on stakeholders assessed.
- Type of impact: Positive, Negative, Both combined
- Information is publicly available.

No, we do not assess our impact on external stakeholders.

Not applicable. Please provide explanations in the comment box below.

Not known

Info Text:

Created by S&P Global, on 06 May 2024 15:25

1.3.5 Materiality Metrics for External Stakeholders

Additional credit may be granted for publicly available evidence.

Have you evaluated the positive/negative impacts on external stakeholders using quantitative output and impact metrics? Please note that philanthropic initiatives or project-based impact assessments are not accepted in this question.

✔ Yes, we have quantitative metrics used to value the external impact on society and/or the environment. Please provide supporting evidence:

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<thead>
<tr>
<th>Impact 1</th>
<th>Impact 2</th>
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<tbody>
<tr>
<td><strong>Material Issue for External Stakeholders</strong>&lt;br&gt;Please specify the material issue that generates a positive/negative impact on external stakeholders.</td>
<td></td>
</tr>
<tr>
<td><strong>Output Metric</strong>&lt;br&gt;Please specify the quantitative metric/s used to measure the output of the direct environmental and/or social results of the business activity.</td>
<td>✔ Quantitative output metric/s linked to material issue</td>
</tr>
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</table>

Created by S&P Global, on 06 May 2024 15:25
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<th>Impact 2</th>
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<tbody>
<tr>
<td><strong>Impact Valuation</strong>&lt;br&gt;Please specify whether you have conducted an impact valuation converting the output metrics to an impact metric to measure the societal or environmental external impact. Please choose the quantitative metric used in the valuation from the list and provide a description of the impact assessed.</td>
<td><strong>Impact Valuation</strong>&lt;br&gt;Please specify whether you have conducted an impact valuation converting the output metrics to an impact metric to measure the societal or environmental external impact. Please choose the quantitative metric used in the valuation from the list and provide a description of the impact assessed.</td>
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No, we do not assess our externalized impacts on external stakeholders.

Not applicable. Please provide explanations in the comment box below.

Not known

**Info Text:**

**Question Rationale** The purpose of this question is to assess the extent to which companies are evaluating the positive and/or negative impacts they are causing on external stakeholders using quantitative metrics linked to the material issues identified in the materiality assessment. To ensure that the company is assessing those impacts, the question asks which quantitative metrics are being used to measure the output of its business activity, the impact that activity has on the external society and/or environment, and also which valuation technique is used to assess the impacts identified. Companies can use impact valuation techniques to assess and compare the potential impacts that their products, services, or operations have had (or may have) on people and the environment. Investors can use impact valuation techniques to assess and compare the potential impacts that companies they are financing or considering financing may have on people and the planet, as well as their own investor contribution to those impacts. **Key Definitions**

**Output Metric:** This refers to the environmental or social direct results caused by a company's business activities in terms of operations, products/services, and/or supply chain. The metrics must be directly linked to the material issue. **Performance metrics included in the IRIS (Impact Reporting & Investment Standards) catalog are accepted as good practice to define output targets to measure social and environmental success:**

- Examples of environmental outputs that could be used to set a specific quantitative metric: - Air pollution reduction (in % or CO2 emissions, NOx Emissions, SOx emissions). - Avoided CO2 emission in % or tons, avoided NOx emissions, avoided SOx emissions. - Water pollution reduction (% of contaminated potable water). - Ground pollution reduction (in % or tons of waste disposed to landfill, incinerator). - Waste diverted from landfill (in ton or %). - Percentage of energy recovered. Examples of social outputs that could be used to set a specific quantitative metric: - Number of entrepreneurs that received a microfinance loan. - Number of fatalities. - Number of permanent
illnesses. - Sales of products protected by intellectual property rights. Impact Valuation: This refers to the process of valuing and quantifying the external damages and/or benefits (positive/negative externalities) to the society and the environment that are caused as a result of the direct environmental and/or social outputs generated by a company's business activities. The valuation usually involves quantitative or monetary approaches or a combination of these. Quantitative valuation measures the impact of the negative/positive externalities on societal stakeholders (e.g., society at large, local communities, end users/consumers) and/or the environment (e.g., natural capital) in quantitative, non-monetary terms. Monetary valuations measure the impact of the negative/positive externality caused in monetary terms (e.g., social costs of environmental damages caused).

Examples of environmental impacts - A change in people's environment: - Improved/decreased quality of the air and water and associated health impact, - Increased/decreased availability and quality of food, - Improved adequacy of sanitation and associated social benefits, - Increased physical safety, - A change in the natural earth system: - disruption of the rain cycle, - increase in land temperature, - acidification of the oceans... - A change in the quality or availability of natural resources: - Destruction of ecosystems, fauna, and flora, - Decreased/increased access to natural resources - Damage/Improvement to/of heritage, spiritual or cultural resources - Decreased/Improvement of quality or availability of natural resources Examples of social impacts - A change in people's quality of life: How they live and interact with one another. - A change in the community: its cohesion, stability, and character. - Capacity and Quality of Infrastructure, services, and facilities: associated impact on people's quality of life and/or health. - A change in health status and wellbeing (physical, mental, social, and spiritual wellbeing): - Improved health awareness. - Deterioration in health status. - Capacity and cost of Local Health Providers. - A change in personal and property rights, such as violation of their civil liberties. - Other changes: - Increase/decrease in local economic development (note that employment is an output metric). - Reduced/increased inequality: distributional impact, e.g., on vulnerable households. - Enhanced local work experience, skills, and employability. To evaluate the external impacts, companies could use different methodologies or standards that can range from standard methodologies from third parties to the company's internal processes. Even this question is not requesting to report the methodology that has been used, a list of the most well-known methodologies and standards that companies use for external impact measurement, management, and disclosure can be found here as a reference: - Social & Human Capital Protocol. - Business for Social Impact (B4SI). - Socio-Economic Assessment Toolbox (SEAT). - Social Return on Investment. - Impact Reporting & Investment Standards (IRIS). - Other third party-methodology. - Company internal methodology. Impact Metric: This is the quantitative (monetary or non-monetary) metric used to measure the impact caused on external societal stakeholders or the environment. It converts the output metric into a quantitative impact metric by evaluating the impact of the external damage or benefits (negative/positive externalities) for societal stakeholders or the environment. Note that the output and impact metrics are directly linked with each other, and with the material issue identified, associated external stakeholder group impacted and the company's business activity in line with the question "Material Issues for External Stakeholder". - Supporting evidence is required linking the output metric to the material issue for external stakeholders. As an example: if the company is tracking its waste diverted from landfill (as a percentage or in metric tons), this is not sufficient unless a link to its external impact on the environment or societal stakeholders is clearly established in the supporting evidence (i.e., private or public documents or comprehensive comment). - If one or both Material Issues in the question "Material Issues for External Stakeholders" are not acceptable, the output metric associated with the material issue identified by the company is also not acceptable due to the missing link between the material issue and its external impact aspects. - For acceptable output metrics, the checkbox should be marked, and the specific value and unit of the output metrics provided in the text box. Companies may choose to provide additional supporting evidence in the form of an explanation. - In case the specific impact is caused by more than one output, companies should specify all the relevant metrics. - Metrics already reported in other CSA questions (e.g., emissions, waste, biodiversity, community impact), will only be accepted as long as there is a clear reference to the external impact dimension in previous question (e.g., importance of the topic to society, preservation of natural capital, contribution to SDGs, impact on climate change, etc.) and an impact metric linked. Impact Valuation: - Supporting evidence to validate that an impact valuation has been conducted is required in the form of private or public document(s) or a comprehensive company comment. - The supporting evidence is expected to provide an explanation of how the output generated by the company

1.3.6 MSA Materiality

In this section we include a performance score on the Corporate Sustainability Monitoring with the objective to verify the company's involvement and management of crisis situations that can have a damaging effect on reputation. The evaluation will be filled in by the responsible analyst of your industry. No additional information is required from your company.

Info Text:
Based on a Media and Stakeholder Analysis (MSA), the consistency of a company's behavior and management of crisis situations is reviewed in line with its stated principles and policies. Results of the MSA range from no impact to high impact - the latter reflecting serious reputational risks with consequences on the company's bottom line (e.g. legal liabilities or high probability of imminent legal liabilities). In addition, the overall quality of the management response to a situation is assessed, evaluating whether a company has transparently and proactively managed the issue.

1.4 Risk & Crisis Management

Effective risk and crisis management is vital for long-term financial planning and organizational flexibility. Since the financial crisis, it has become particularly important. Companies need to implement internal control processes to comply with existing regulations and proactively develop control mechanisms. These questions focus on risk governance, the frequency of risk reviews, emerging risks, and incentivizing, training and empowering employees to develop an effective risk culture. Additionally, we perform a real-time check to assess the system with our internal MSA (Media and Stakeholder Analysis). The scope of the criterion may vary depending on a company's size and ownership structure.
1.4.1 Risk Governance

This question requires publicly available information.

Does the company have a risk governance framework in place and is it available publicly?

- Yes, the company has a risk governance framework. Please indicate where this information is available in public reporting or corporate website.
  - The company has a risk governance framework with board level risk oversight:
    - Dedicated role or committee at board level for risk oversight (independent and/or non-executive board member(s))
  - The company has a risk governance framework with dedicated operational risk management functions in place:
    - Operational Risk Ownership (first line): Front-line employees or dedicated operational roles (e.g., risk managers, business unit heads) own and manage risks.
    - Risk Management and Compliance Oversight (second line): A dedicated role(s) or committee(s) exist(s) at the senior management or executive level, which is responsible for setting control standards and oversees compliance with them (does not include the CEO).
    - Independent Audit Unit (third line): An internal audit function that provides independent assurance on the effectiveness of risk management and compliance processes.

- No, the company does not publicly report on its risk governance framework.

- Not applicable. Please provide explanations in the comment box below.

Info Text:

Question Rationale The purpose of this question is to assess the effectiveness of a company's risk governance framework. For this, it is important the company's senior management and board of directors are not just aware of risks but also actively involved in managing them. While the board of directors is ultimately responsible for risk management, it is up to senior management to take the board's strategic direction and turn it into appropriate policies and procedures, and to effectively implement, execute, and monitor these policies. The three lines of defense model is a recognized governance framework for managing risks. It lays out clear risk management responsibilities and accountabilities to ensure a company’s risk-related objectives are achieved. In this model, the first and second lines are responsible for executing and monitoring risk management activities. The third line operates independently to check how well the risk management processes are working. Key Definitions Board level responsibility: A dedicated role or committee at the level of the highest governing body consisting of independent and/or non-executive board member(s). This could be a risk committee or an audit committee tasked with explicit responsibility for risk management overview. For two-tier boards, the board-level committee must be formed of members of the supervisory board. Operational Management Functions (Three Lines of Defense Model) Operational risk Ownership (first line): The employees or teams directly involved in producing and/or delivering products and services to clients. They are responsible for owning and managing risks in day-to-day operations. The first line is responsible for the execution of controls set by the second line. We expect clear assignment of risk management responsibilities at the business unit level, which could include roles such as risk owners, risk managers and business unit heads. Risk management and compliance oversight (second line): The individual(s), committee(s) or body(ies) in the organization charged with monitoring and supporting risk management processes, ensuring risk management objectives are achieved. This oversight typically falls to senior management or the executive level, which are responsible for setting control standards and overseeing compliance. The second line responsibility may be split into several sub functions - related to risk type for example - from a main/group function in charge of monitoring risk. However, we expect that specific sub functions would report into an overarching role or main function as defined by the company. For two-tier boards, risk management responsibility as the second line of defense can be at the management board level. Examples of responsible people or committees include the chief risk officer, risk management committee and chief compliance officer. Given that the CEO has ultimate responsibility for all aspects of a company's operations, the CEO is not accepted here; rather, the expected function would report to senior management or the CEO. Independent audit unit (third line): The unit tasked with advising and auditing to ensure policies are followed and processes are executed in line with management's selected performance.

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goals and risk tolerances. This could be an internal audit team or a comparable external function, providing independent assurance that organizational practices are aligned with the company’s risk strategy and policies, as implemented by the first and second lines. The independence of this unit ensures objective monitoring and control of various risks, safeguarding the organization's interests without conflicts of interest arising from other business priorities. This function typically reports directly to the board of directors on top of senior/ executive management and remains separate from the implementation of processes or risk management to preserve its objectivity. Note: The responsibilities of internal audit as part of the third line of defense extend beyond financial reporting compliance audits. Data Requirements To answer this question, it's important to focus on the organization’s general risk management governance framework, rather than responsibilities defined in specific sections of the report such as Occupational Health & Safety, Human Rights or Climate Change. Disclosure Requirements - The document(s) you attached will be used to verify your response. The supporting documents need to be available in the public domain (e.g., annual report, sustainability report, integrated report, company publications) or corporate website. - Any response that cannot be verified in the attached document(s) will not be accepted. References COSO Framework The Institute of Internal Auditors 1.4.2 Risk Management Processes This question requires publicly available information. Does the company have risk management processes and strategies to promote an effective risk culture and is it available publicly? ❍ Yes, the company has risk management processes and strategies to promote an effective risk culture. Please indicate where this information is available in public reporting or corporate website. Risk Review Aspects of our risk review process include the following:
- Description of the company-specific risk exposure (considering likelihood and magnitude) of at least two identified risks
- Description of process or framework to determine the risk appetite for identified risks
- Description of mitigating actions for at least two identified risks

Risk Exposure We review our company's risk exposure on a regular basis. Please attach evidence of the frequency of the assessments:
- At least twice a year or more frequently
- At least yearly
- Less frequently than yearly
- Not specified

Risk Management Process Audit We have conducted an audit of the risk management process. Please specify if an internal audit and/or an external audit has been performed:
- Yes, we have conducted an internal audit in the last two years
- Yes, we have conducted an external audit in the last two years

Risk Culture We have strategies in place to promote an effective risk culture throughout the organisation:
- Regular risk management education for all non-executive directors
- Focused training throughout the organization on risk management principles
- Incorporation of risk criteria in the development of products and services
- Financial incentives which incorporate risk management metrics

❍ No, the company does not publicly report on risk management processes and strategies.
❍ Not applicable. Please provide explanations in the comment box below.
1.4.3 Emerging Risks

Info Text:
Question Rationale The purpose of this question is to assess a company's risk management practices and strategies, essential for fostering an effective risk culture. Effective risk and crisis management are vital for long-term financial stability and adaptability. Implementing internal control processes ensures compliance with current regulations and positions a company to proactively refine these controls. Conducting robust risk assessments including evaluating risk exposure and determining risk appetite allow companies to respond strategically to events that may have a material impact. Moreover, regular and frequent risk reviews and audits can enhance the effectiveness of risk management processes. To embed these practices into the wider organization, measures should be taken to educate and incentivize employees at all levels of the business, thereby nurturing a strong and effective risk culture. Such an approach ensures risk management is not just a compliance exercise but a fundamental part of the company's operational mindset. Key Definitions Risk review: A risk review is a process that involves identifying risks and assessing or reassessing their impact and likelihood. This process includes updating the status of various risks and implementing procedures to identify hazards and determine potential negative effects. This may include stress testing and sensitivity scenario analyses. We expect risk exposure to be reported for at least two of the identified risks. The elements that define a risk review and are considered best practice include: 1. Description of company-specific risk exposure: This should at least evaluate the potential magnitude and likelihood of materialization of the risk, considering the factors unique to the business or industry to define the impact of the risk on the company, e.g., stress testing, scenario analysis and sensitivity analysis are measures to assess the magnitude of impact when risks materialize but do not necessarily give an indication of likelihood of materialization. 2. Process or framework to determine risk appetite: There should be a clearly defined process or framework outlining the company's risk appetite (the level of risk it is willing to accept) for the identified risks including who within the organization is responsible for this. 3. Description of mitigating actions: Actions taken to reduce the severity of the risk and the likelihood of potential negative impacts should be described. We expect mitigating actions to be reported alongside at least two of the identified risks for which the company has described specific risk exposure. Review of risk exposure: Regular reviews are essential to keep up with changes in the risk landscape that could affect the company's risk exposure. These reviews help the organization to stay resilient against potential risks. They ensure the designated risk appetite and mitigating actions stay up-to-date and relevant. The mere reporting of risk exposure indicators, e.g., in the annual report is not considered sufficient evidence of an active risk exposure review process. Audit of risk management processes in the last two years: This involves a systematic assessment of the methods, tools and processes used in identifying, evaluating, controlling, monitoring and reporting risks. Per best practice, audits can be conducted by qualified, internal auditors and by qualified, independent third-party auditors. These audits should follow guidelines on management systems audits or risk management standards such as ISO 31000 and should be conducted at least every two years. Audits related to internal controls of financial reporting and statements of commitment are not considered sufficient here. The frequency of audits should be clearly reported. Promotion of an effective risk culture: Creating a strong risk culture is important for integrating risk processes, procedures and employee awareness throughout the organization. This can be achieved by: - Regular risk management education for non-executive directors: Education of board members should be recurring and specific to risk management. This is different from regular risk reporting to the board. - Providing training to all employees: Training must cover risk management and be provided at a group level. - Considering risk factors when developing new products or services: Risk criteria can be linked to financial risks, regulatory risks, operational risks, etc. - Offering financial incentives tied to meeting risk-related goals: Incentives should be related to specific risks the company has identified as key concerns. For instance, if health and safety or governance are noted as primary risks, incentives could be connected to these areas. Data Requirements To answer this question, it is important to focus on the organization's general approach to risk identification and risk review, rather than specific areas such as occupational health & safety, human rights or, climate change. Reports such as those from the Task Force on Climate-related Financial Disclosures (TCFD) or the Carbon Disclosure Project (CDP) are not considered suitable evidence in this context. However, if climate change is identified as a significant material risk, we would expect it to be reported in the overarching risk section. Disclosure Requirements - The document(s) you have attached will be used to verify your response. The supporting documents need to be available in the public domain (e.g., annual report, sustainability report, integrated report, company publications) or corporate website. - Any response that cannot be verified in the attached document(s) will not be accepted. References COSO Framework ISO 31000:2018 Risk Management
This question requires publicly available information.

Please indicate two important long-term (3-5 years+) emerging risks that your company identifies with the most significant impact on the business in the future, and indicate any mitigating actions that your company has taken in light of these risks. For each risk, please provide supporting evidence available in your reporting for the description of the risk, the business impact and any mitigating actions, and choose the category to which the risk belongs.

<table>
<thead>
<tr>
<th>Emerging Risk 1</th>
<th>Emerging Risk 2</th>
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<tbody>
<tr>
<td><strong>Supporting evidence</strong></td>
<td><strong>Supporting evidence</strong></td>
</tr>
<tr>
<td>Listed companies are required to provide links to public reports or corporate websites. Non-Listed companies are required to provide internal documents and/or links to public reports or corporate websites.</td>
<td>Listed companies are required to provide links to public reports or corporate websites. Non-Listed companies are required to provide internal documents and/or links to public reports or corporate websites.</td>
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<table>
<thead>
<tr>
<th>Name of the emerging risk</th>
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<tr>
<td>Emerging Risk 1</td>
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<tr>
<td><strong>Category</strong></td>
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<tr>
<td>Economic</td>
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<td>Environmental</td>
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<td>Geopolitical</td>
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<td>Societal</td>
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<tr>
<td>Technological</td>
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<td>Other</td>
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<tr>
<th>Description</th>
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<tr>
<td>We report on the description and specification of emerging risk 1 in the context of the company’s business. Please provide the description in the text box below.</td>
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<tr>
<td>We report on the description and specification of emerging risk 2 in the context of the company’s business. Please provide the description in the text box below.</td>
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<th>Impact</th>
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<tr>
<td>We report on the potential impact of emerging risk 1 on the company’s business. Please provide the impact description in the text box below.</td>
</tr>
<tr>
<td>We report on the potential impact of emerging risk 2 on the company’s business. Please provide the impact description in the text box below.</td>
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<tr>
<th>Mitigating actions</th>
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<tbody>
<tr>
<td>We report on the mitigating actions of emerging risk 1. Please provide the description of the mitigating actions in the text box below.</td>
</tr>
<tr>
<td>We report on the mitigating actions of emerging risk 2. Please provide the description of the mitigating actions in the text box below.</td>
</tr>
</tbody>
</table>

- We do not report on long-term, emerging risks according to the relevant disclosure requirements of this question.
- Not applicable. Please provide explanations in the comment box below.
Not known

Info Text:
Question Rationale: It is important for investors to understand the long-term risks that companies face along with companies' awareness of the impacts of these risks on their business and any mitigating actions that they may be taking in response to such risks - beyond the ongoing operational risks reported by most companies. In disclosing these risks to investors, companies show their ability to plan effectively for long-term risks. Reporting on long-term risks, their impacts on their business, and the mitigating actions they are taking can improve investors' confidence in management's ability to plan effectively for long-term challenges and therefore may make the company a more attractive long-term investment. Key Definitions: Emerging risks: The focus should lie on the most significant emerging risks that are expected to have a long-term impact on the company and that are explained in public disclosures. Risks that are considered to be acceptable here include any newly identified risks that are expected to have a long-term impact on the company's business, although in some cases they may have already begun impacting the company's business today. A risk, by definition, has not materialized. However, an emerging risk in addition to not having materialized, is unprecedented and has not been handled in the past. Therefore, there is a lack of knowledge/preparation when it comes to managing the potential risk. Impact on the business: It is not expected that a precise financial impact of these risks on the business can already be calculated or estimated, but rather a convincing description of how these emerging risks could impact the business, and require the company to adapt its strategy and/or business model. Risk categories: The risk categories available in the dropdown menu are aligned with the categories defined in the World Economic Forum – Global Risk Report. The categories are Economic, Environmental, Geopolitical, Societal, and Technological. While we acknowledge that the five categories above might not be exhaustive, the category "Other", should only be used for other external risk categories that are industry-specific. Categories such as operational risk, compliance risk, reputational risk, competition risk, or market risk are not acceptable. Data Requirements: Because the disclosure of long-term emerging risks (beyond operational risks commonly reported by companies or required by regulators) is so important for long-term investors, the risks provided in this question should correspond to risks that are disclosed publicly (e.g., annual report, sustainability report, integrated report, company publications, corporate website, risk reports). Additional specifications related to the description of the risk, the business impact, and mitigating actions not available in the public domain will not be considered. a) Emerging risks reported in this question have to be part of the broad, cross-functional and general risk assessment exercise of a company, therefore we would not accept risks identified as part of a specific risk assessment exercise (Human Rights risk assessment, OHS risk assessment, climate risk assessment, etc.). b) The same risk cannot be reported for more than 3 years in a row. Similarly, if the company has been reporting the same risk in its public disclosure for more than 3 years, it is not considered emerging anymore. c) An emerging risk needs to fulfill the six below requirements in order to be accepted: - The risk is new, emerging. - The potential impact of the risk may be unknown and is long-term, i.e., the risk is unlikely to have a significant immediate impact on the company, but potentially may have begun to have consequences for the company today. - The potential impact of the risk is significant, i.e., it has the potential to affect a large part of the company's operations and may require the company to adapt its strategy and/or business model. - The risk is an external risk, i.e., it arises from events outside the company that are beyond its influence or control. Sources of these risks include natural, geopolitical, or macroeconomic factors, but exclude operational, reputational, or market risks. - The risk and its impact on the company are specific. For example, long-term risks like macroeconomic developments should be described in the context of the business environment that the company operates in (i.e., the specific regulations or laws that may be introduced) and the impact on the company should be specific (i.e., not simply the description of the overall impact on the industry). - The risk and its impact are publicly disclosed with the exception established for Non-Listed companies. As a result, climate change, for example, would not be an acceptable emerging risk since it is an issue that has been significantly impacting the business environment for a number of years and that companies would have prepared for. The mitigating actions have to be reported together with the risk and its impact, as a response to the risk. Disclosure Requirements: Listed and/or publicly owned companies are required to provide links to public reports or corporate websites. Non-listed companies are required to provide the following evidence, depending on the type of company: - Family-owned companies and Privately owned companies are required to provide public reports, corporate websites, or internal documents. - Cooperatives are required to provide public reports, corporate websites, or internal documents. - State-owned companies are required to report on their risk management in the public domain as their key stakeholder is the general public. References: World Economic Forum – The Global Risks Report.
1.4.4 Global Systemically Important Banks

This question requires publicly available information.

Please indicate the components of your Basel III leverage ratio (fully phased-in Basel III framework) and indicate whether you are considered a "Global Systemically Important Bank (G-SIB)". Please indicate where this information is available in your public reporting or corporate website.

- Yes, we publicly report on the components of the Basel III leverage ratio.
- Your company's reporting currency:

<table>
<thead>
<tr>
<th>BIS Leverage Components</th>
<th>FY 2022</th>
<th>FY 2023</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Basel III) Tier 1 Capital</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(Basel III) Total Exposure (on and off balance sheet exposures)</td>
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<td></td>
</tr>
<tr>
<td>(Basel III) Leverage Ratio</td>
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</tbody>
</table>

- We do not disclose the separate capital and exposure components but disclose our leverage ratio of minimum 3% or publicly confirm compliance with the minimum leverage ratio requirements of 3%.

Are you considered a "Global Systemically Important Bank (G-SIB)" as per definition, methodology and most updated list of the Financial Stability Board (FSB)? Please refer to the information button for more information on the exact definition.

- Yes, we are considered a G-SIB by the Financial Stability Board.
- Please specify in which bucket (1-5) corresponding to the required level of additional loss absorbency you are allocated to:
  - level 1
  - level 2
  - level 3
  - level 4
  - level 5

- No, we are not considered a G-SIB.

- We do not report on the components of the Basel III leverage ratio.
- Not applicable. Please provide explanations in the comment box below.

Info Text:
Question Rationale: Banks play a vital role in the flow of money and credit between savers and borrowers. For a working economy and society, the stability and sustainability of the entire financial system are of utmost importance. The burdens faced by taxpayers during the state bailouts of the 2008 financial crisis have driven national and international regulatory initiatives that press for the adoption of stronger capital requirements and loss absorbency, among other measures. Global Systemically Important Banks, as defined and monitored by the Financial Stability Board, are particularly subject to these regulatory initiatives, as the Basel Committee on Banking Supervision seeks to improve the resilience of banks and banking systems by examining those institutions that are active in business areas with high-risk exposure. The reforms go some way in addressing the negative externalities caused by the failure of highly complex financial institutions as a result of their risk-taking activities. Key Definitions: Tier 1 Capital: Tier 1 capital is the sum of (1) Common Equity Tier 1 and (2) Additional Tier 1 capital, net of the regulatory adjustments applied to those categories. Tier 1 Capital is intended to measure a bank’s financial health and is used when a bank must absorb losses without ceasing business operations. Under Basel III, the minimum Tier 1 Capital Ratio is 6% of risk-weighted assets. Common Equity Tier 1 (CET1) capital: CET1 capital consists of common shares issued by the bank and its subsidiaries, stock surplus (share premiums) from the instruments included in CET1, retained earnings, and any other
income or disclosed reserves and is subject to regulatory adjustments. Under Basel III, the minimum Common
Equity Tier 1 Capital Ratio is 4.5% of risk-weighted assets. (HYPERLINK: BIS – RBC – Risk-based capital
requirements) Additional Tier 1 capital: Additional Tier 1 capital consists of additional instruments issued
by the bank and its subsidiaries and related stock surplus (share premiums) and is subject to regulatory
adjustments. Total Regulatory Capital: Total Regulatory Capital is the sum of (1) Common Equity Tier 1, (2)
Additional Tier 1 and (3) Tier 2 capital, net of regulatory adjustments. Under Basel III, the minimum Total
Capital Ratio is 8%. (BIS – RBC – Risk-based capital requirements) (BIS - CAP - Definition of capital)
Exposure measure for Basel III leverage ratio: A bank’s total leverage ratio exposure measure is the sum of the following
exposures: (a) on-balance sheet exposures; (b) derivative exposures; (c) securities financing transaction (SFT)
exposures; and (d) off-balance sheet (OBS) items. (BIS - LEV - Leverage ratio) Leverage Ratio: The Basel III
leverage ratio is a measurement of a bank’s Tier 1 Capital measure divided by its exposure measure (sum of
the exposures of all assets and on and off-balance sheet items) that signifies a bank’s financial strength,
with the ratio expressed as a percentage. The Basel Leverage Ratio framework aims to prevent banks from
having an overreliance on leverage. This ratio is meant to be a supplementary measure to risk-based capital
requirements. The leverage ratio is utilized by regulators and investors because it shows how well a bank can
withstand financial stress and remain solvent. Basel III introduced a minimum "leverage ratio", with banks
expected to maintain a ratio in excess of 3%. The leverage ratio applies to all internationally active banks.
(BIS - LEV - Leverage ratio) Global systemically important banks (G-SIBs): G-SIBs are institutions that are
perceived as not being allowed to fail due to their size, interconnectedness, complexity, lack of substitutability
or global scope. Individual institutions may choose outcomes that are sub-optimal on a system-wide level and
may cause negative externalities borne by taxpayers. Basel III assesses G-SIBs based on defined indicators
on an annual basis and classifies them into different buckets that relate to the systemic importance of the
assessed institution. The higher the bucket (level 1-5) the higher is the risk associated with the institution for
the global financial system. Data Requirements In the question table, we expect disclosure on your status
as a G-SIB and on the components of the (Basel III) leverage ratio: the (Basel III) Tier 1 Capital measure and
the (Basel III) Total Exposure measure. If you are a US institution, you may report the supplementary leverage
ratio (eSLR/SLR) components. Please note that all banks are required to report the leverage ratio. If you report
a leverage ratio above 3% but do not separately disclose the two components of the ratio, please mark the
option "We do not disclose the separate capital and exposure components but disclose our leverage ratio
of minimum 3% or publicly confirm compliance with the minimum leverage ratio requirements of 3%.” For
banks of a specific country with late implementation of the Basel III leverage ratio framework, please select
"Not applicable", with clear explanation and link to responsible government or regulatory authority. You can
find the methodology defining “Global Systematically Important Banks” here: Global systemically important
banks: assessment methodology and the additional loss absorbency requirement (bis.org) The list of G-SIBs
is published annually here: Global Systemically Important Financial Institutions (G-SIFIs) - Financial Stability
Board (fsb.org) Supporting evidence: This question requires supporting evidence from the public domain. The
information provided has to be included in your public reporting (e.g., annual report, sustainability report,
integrated report, company publications, pillar 3 report) or corporate website. Any response that cannot be
verified in the attached public document(s) will not be accepted.

1.4.5 MSA Risk & Crisis Management

In this section we include a performance score on the Corporate Sustainability Monitoring with the objective of
verifying the company’s involvement and management of crisis situations that can have a damaging effect on
reputation. The evaluation will be filled in by the responsible analyst of your industry. No additional information
is required from your company.

Info Text:
Based on a Media and Stakeholder Analysis (MSA), the consistency of a company’s behavior and management
of crisis situations is reviewed in line with its stated principles and policies. Results of the MSA range from no
impact to high impact - the latter reflecting serious reputational risks with consequences on the company’s
bottom line (e.g. legal liabilities or high probability of imminent legal liabilities). In addition, the overall quality
of the management response to a situation is assessed, evaluating whether a company has transparently and proactively managed the issue.

1.5 Business Ethics

Business ethics are at the crux of a well-functioning business. By establishing integrity across business lines and amongst employees, trust can be built with key stakeholders, and employees and the general public can be safeguarded. The criterion evaluates the Codes of Conduct, their implementation and the transparency surrounding reporting on breaches.

1.5.1 UN Global Compact Membership

This question requires publicly available information.

Is the company a signatory/participant of the UN Global Compact and is this information available publicly?

- Yes, the company is a signatory/participant. Please indicate where this information is available in public reporting or corporate website.
- No, the company is not a signatory, but its parent company is a signatory/participant. The information is publicly available.
- No, the company does not publicly report on whether it is a signatory/participant.
- Not applicable. Please provide explanations in the comment box below.

Info Text:

Question Rationale The UNGC is a reference point for investors to apprehend which companies are truly committed to sustainable growth. Indeed, being a participant/signatory of the UNGC requires a public commitment of the company's CEO and the yearly release of a Communication on Progress. Therefore, this question aims to verify whether companies have taken this important public stance, regardless of their size. Data Requirements In order to accept answers, we need to verify your company's participation in the UNGC in the public domain. Please, attach a public letter of commitment or last year's Communication on Progress. Please note that we also accept a link to the list of active members on the UNGC website where we can verify the name of your company. Taiwanese companies not already members of the UNGC should select "Not applicable" and provide explanations in the comment box. References United Nations Global Compact UNGC Signatory List

1.5.2 Codes of Conduct

This question requires publicly available information.

Does the company have a code of conduct at a group level (including subsidiaries) and is it available publicly?

- Yes, the company has a group-wide code of conduct and it covers the following aspects. Please indicate where this information is available in public reporting or corporate website.
  - Corruption and bribery
  - Discrimination
  - Confidentiality of information
  - Conflicts of interest
  - Antitrust/anti-competitive practices
Money-laundering and/or insider trading/dealing
Environment, health and safety
Whistleblowing

No, the company does not publicly report on its group-wide code of conduct.
Not applicable. Please provide explanations in the comment box below.

**Info Text:**
Question Rationale Codes of Conduct are corporate documents outlining a company's values, principles and guidelines in a variety of areas. Ideally, codes combine aspirations and detailed standards on how to put them into practice, guiding the way the company conducts its business activities. Codes of Conduct are voluntary but often seen as an important part of company culture, reputation and compliance. With this question, we assess the existence and scope of a company's Code of Conduct. Data Requirements Please be aware that Codes of Conduct can come in different formats and have different names (e.g., internal rules, company's credo, compliance codes, ethics codes, codes of practice, charters). Supporting evidence: This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications, separate fuel efficiency strategy document) or corporate website. Any response that cannot be verified in the attached public document(s) will not be accepted.

1.5.3 Crime Prevention: Business Policy/Procedures

This question requires publicly available information.

Does your company have publicly available policies or procedures in place to ensure the effective establishment and implementation of a company culture opposing money-laundering and terrorism financing? Please indicate where this information is available in your public reporting or corporate website.

Yes, our policies or procedures are publicly available and specifically include the following:

- Customer due diligence (CDD): formal policies and procedures include customer verification based on reliable, independent source documents, data or information, identification of the beneficial owner, or conducting ongoing due diligence on business relationships
- Non-face-to-face CDD: formal policies and procedures are in place for non-face-to-face customers including, amongst other measures, certification of documents presented and independent contact with the customer by the bank
- Terrorist financing: CDD procedures include formal searches against lists of known or suspected terrorists issued by competent authorities having jurisdiction over the relevant financial institution
- Politically exposed persons (PEPs): formal policy and procedures in place covering the identification, periodical review and monitoring of PEPs
- Senior management to sign off PEP customers or other customers from countries, businesses and products with the greatest risk of money-laundering/terrorism financing
- Record keeping for all anti-money-laundering/terrorism financing-related documents. Please indicate the number of years:

- Annual independent assessment of monitoring procedures, please specify.

No, we do not have policies or procedures in place
Not applicable. Please provide explanations in the comment box below.

**Info Text:**
Question Rationale With the increasing use of e-banking, fighting terrorist and illegal financing poses new challenges for the financial industry. New frameworks for anti-money laundering principles are being introduced. In Switzerland for example, artificial intelligence software to detect money laundering is legally
mandatory since July 2003. Companies without appropriate processes are more likely to be vulnerable to money laundering or terrorism financing. For such companies, the reputational impact and financial impact of fines can be substantial. Key Definitions Politically exposed persons: They are individuals entrusted with prominent public functions in a foreign country, for example, Heads of State or of government, senior politicians, senior government, judicial or military officials, senior executives of state-owned corporations, or important political party officials. Business relationships with family members or close associates of PEPs involve reputational risks similar to those with PEPs themselves. The definition is not intended to cover middle-ranking or more junior individuals in the foregoing categories. Third-party verification: Assessment of the anti-money laundering (AML) monitoring procedures by a third-party organization. Data Requirements This question is "Not applicable" for: - Investment holding companies, that handle a broad portfolio of investments in various industries; and - FBN data providers or FBN technology platform providers that do not offer/hold client accounts. Public anti-money laundering policies: the information that such policies exist and include the required elements are sufficient, the policy documents do not need to be public.

1.5.4 Corruption & Bribery

This question requires publicly available information.

Does the company have a policy on anti-corruption and bribery at a group level (including subsidiaries) and is it available publicly?

- Yes, the company has a group-wide policy on anti-corruption and bribery and it covers the following aspects. Please indicate where this information is available in public reporting or corporate website.
  - Bribes in any form (including kickbacks) on any portion of contract payments or soft dollar practices
  - Direct or indirect political contributions
    - Political contributions publicly disclosed. Please indicate web address:
  - Charitable contributions and sponsorship
    - Charitable contributions and sponsorship publicly disclosed. Please indicate web address:

- No, the company does not publicly report on a group-wide policy for anti-corruption & bribery.

- Not applicable. Please provide explanations in the comment box below.

Info Text:

Question Rationale Corruption and bribery are economic crimes that are consistently harmful to a company's intangible assets (such as its reputation, staff morale, or business relationships). Companies doing business in countries with weak anti-corruption and bribery laws are exposed to additional reputational and legal risks. Evidence of corrupt practices can result in a company's exclusion from contracts financed by institutions that blacklist bribe suppliers (for example, the World Bank's list of debarred firms), potentially affecting the company's future earnings. Due to the additional types of risk that corruption introduces, it creates uncertain consequences for investors and therefore increases the risk premium a company must pay for debt or equity. This question assesses the anti-corruption and bribery policy a company has in place to complement legal requirements (or to compensate for the lack of such requirements in certain countries). Because political and charitable contributions can be used as a subterfuge for bribery, they should be explicitly covered by the anti-corruption policy and should be publicly disclosed. Key Definitions Kickback: A kickback refers to a share of misappropriated funds one organization pays another in a case of corrupt bidding. This can occur in a business context or in any other situation in which people are entrusted to spend funds that do not belong to them. In this context, a company would win a contract in a public bidding process even if its provided quote exceeds the market price or best offer. For the benefit of winning the contract, the provider of the service then pays a kickback (for example, the difference between the overvalued and the actual market price, or part of this difference) to the buyer. Soft dollar: The term soft dollar is used in the finance industry and refers to in-kind payments made by a money manager (a fund, investor, etc.) to its service providers. Instead of paying the service providers with cash (i.e., hard dollars), the investor pays in kind (i.e., with soft dollars) by passing on the business to its service providers. Political contributions and charitable donations: This question specifically considers contributions and donations that act as a means of bribery and corruption, and this needs to be explicitly addressed in the attached policies. In the context of this question, disclosure of details of contributions and donations is only considered for topics that are specifically covered in relevant
policies, such as the company Codes of Conduct or a separate anti-corruption and bribery policy. Other aspects related to political contributions and charitable donations that are not linked to bribery or corruption are addressed in other parts of the questionnaire. Data Requirements This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications, corporate citizenship/corporate social responsibility report) or corporate website. Please ensure that the marked options are both covered by your company's policy and are clearly disclosed in the attached documents. References - OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, 1997 - United Nations Convention Against Corruption, 2003 - Business Principles for Countering Bribery, 2013 (by Transparency International)

1.5.5 Codes of Conduct: Systems/Procedures

This question requires publicly available information.

Does the company have mechanisms in place to ensure effective implementation of its codes of conduct and are they available publicly?

- Yes, the company has mechanisms in place to ensure effective implementation of its codes of conduct. Please indicate where this information is available in public reporting or corporate website.

| Aspect: | Please provide supporting evidence for the aspect and indicate page numbers:
<table>
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<tbody>
<tr>
<td>Responsibilities, accountabilities and reporting lines are systemically defined in all divisions and group companies</td>
<td></td>
</tr>
<tr>
<td>Dedicated help desks, focal points, ombudsman, hotlines</td>
<td></td>
</tr>
<tr>
<td>Compliance linked to employee remuneration</td>
<td></td>
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<tr>
<td>Employee performance appraisal systems integrates compliance/codes of conduct</td>
<td></td>
</tr>
<tr>
<td>Disciplinary actions in case of breach, i.e. warning, dismissal, zero tolerance policy</td>
<td></td>
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<tr>
<td>Compliance system is certified/audited/verified by third party. Please review the additional information and question guidance banner for further detail.</td>
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</tbody>
</table>

- No, the company does not publicly report on mechanisms to ensure effective implementation of its codes of conduct.

- Not applicable. Please provide explanations in the comment box below.

Info Text:

Question Rationale As with every strategy or goal, a code of conduct is only as good as the level that it is complied with. A company therefore needs to have proper systems and procedures in place to ensure the implementation of its code of conduct to assure employees, creditors, business partners, shareholders and other stakeholders that internal systems will not be co-opted, circumvented or overridden. Data Requirements Third-party verification: For the certification/audit/verification of the compliance system, only independent third parties are accepted. Internal audit is not considered an independent third party. A third-party review must cover the company's codes of conduct and compliance systems for enforcing these codes, including tracking and reporting of breaches. Third-party assurance on other financial data or sustainability reporting is not accepted here. Supporting evidence: - This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report,
integrated report, company publications) or corporate website. Any response that cannot be verified in the attached public document(s) will not be accepted.

1.5.6 Reporting on breaches

This question requires publicly available information.

Does your company publicly report on breaches (e.g. Corruption, Discrimination etc.) against your codes of conduct/ethics? Please specify where this information is available in your public reporting or corporate website.

- Yes, we publicly report breaches of the Codes of Conduct
  - We report on following areas:
    - Corruption or Bribery
    - Discrimination or Harassment
    - Customer Privacy Data
    - Conflicts of Interest
    - Money Laundering or Insider trading

- We report breaches on a combined basis for all areas in the Code of conduct
- We report breaches on a combined basis, but only for some areas in the Code of conduct
- We report that no Codes of Conduct related breaches have occurred during the most recent reporting cycle
- No, we do not publicly report on breaches.

Not applicable. Please provide explanations in the comment box below.

Info Text:

Question Rationale Organizations are increasingly expected by the marketplace, international norms, and stakeholders to demonstrate their adherence to integrity, governance, and good business practices. Reporting to authorities is mandatory in many countries but our questions are looking for evidence of transparent corporate reporting to all stakeholders. This question assesses the transparency a company shows in relation to breaches of its codes of conduct or anti-corruption & bribery policies towards its stakeholders, both for the occurrence of incidents as well as the company's response. Key Definitions Customer Data Privacy: Data breach relative to the customer. This can be defined as the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed. This can include, but is not limited to, the disclosure of customer personally identifiable information, theft of customer financial information, healthcare data and more. Data Requirements Disclosure on various aspects of code of conduct related breaches is assessed in this question such as Corruption, Discrimination, Privacy, Insider Trading etc. Filings to authorities that are not publicly available to all stakeholders will not be considered here. If the company discloses just the total number of breaches for all aspects of the code of conduct (Without breakdown) then the second option 'We report on total number of cases/breaches but do not report on specific areas' should be selected. In case, while reporting a company has clubbed some areas of breaches then the third option, 'We report breaches on a combined basis, but only for some areas in the Code of conduct' will be marked. If there were no code of conduct breaches, the fourth option "We report that no Codes of Conduct related breaches have occurred during the most recent reporting cycle" should be chosen and indicate where this is publicly reported. The absence of breaches needs to be publicly disclosed for the purpose of this question and an indication of where this is publicly reported should be given. A comment indicating that no breaches occurred and that reporting would have been available in the event of such breaches occurring is not sufficient for this question. Supporting evidence - This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications or corporate website). Any response that cannot be verified in the attached public document(s) will not be accepted. References OECD Convention on Combating Bribery.

1.5.7 MSA Business Ethics

In this section, we include a performance score on the Corporate Sustainability Monitoring with the objective of verifying the company’s involvement and management of crisis situations that can have a damaging effect on reputation. The evaluation will be filled in by the responsible analyst of your industry. No additional information is required from your company.

Info Text:
Based on a Media and Stakeholder Analysis (MSA), the consistency of a company’s behavior and management of crisis situations is reviewed in line with its stated principles and policies. Results of the MSA range from no impact to high impact - the latter reflecting serious reputational risks with consequences on the company’s bottom line (e.g. legal liabilities or high probability of imminent legal liabilities). In addition, the overall quality of the management response to a situation is assessed, evaluating whether a company has transparently and proactively managed the issue.

1.6 Policy Influence

Although companies can legitimately represent themselves in legislative, political and public discourse, excessive contributions to political campaigns, lobbying expenditures and contributions to trade associations as well as the lack of transparency about those contributions may damage companies’ reputations and creates risks of corruption. Perceived misalignment between a company’s commitments to combat climate change and its lobbying activities can also damage its reputation, and significantly undermine global efforts to transition to more sustainable economies.

In this criterion we evaluate the transparency of companies’ disclosures on the amounts they contribute to political campaigns, trade associations and other tax-exempt groups, and on lobbying expenditures. Additionally, we assess the management systems companies have in place to ensure lobbying activities and memberships of trade associations are aligned with the Paris Agreement to limit global warming to well below 2 degrees Celsius.

1.6.1 Contributions & Other Spending

Additional credit may be granted for publicly available evidence.

Please indicate your annual total monetary contributions to and spending for political campaigns, political organizations, lobbyists or lobbying organizations, trade associations and other tax-exempt groups, as defined in the Info Text. If this information is publicly reported, please provide supporting evidence or indicate the weblink below. PAC contributions by employees should not be included.

Please also indicate if these figures are provided in your public reporting.

We are able to itemize the figures. If you have not made any contributions for one or more items, please enter 0 and indicate if this information is available in your public reporting.

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<th>FY 2020</th>
<th>FY 2021</th>
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<td>Lobbying, interest</td>
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<td>Local, regional or national political campaigns / organizations / candidates</td>
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<tr>
<th>Trade associations or tax-exempt groups (e.g. think tanks)</th>
<th>FY 2020</th>
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<tr>
<th>Other (e.g. spending related to ballot measures or referendums)</th>
<th>FY 2020</th>
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<tr>
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<th>FY 2021</th>
<th>FY 2022</th>
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<tr>
<td>Percentage of:</td>
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We can only report the total spending figures. Please indicate the items included in your total spending figures. If an item is not included, please select "not included". If you have not made any contributions for a specific category, please select "No contribution." Please also indicate if these figures are provided in your public reporting.

<table>
<thead>
<tr>
<th>Lobbying, interest representation or similar</th>
<th>FY 2020</th>
<th>FY 2021</th>
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<tr>
<th>Local, regional or national political campaigns / candidates</th>
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<th>Trade associations or tax-exempt groups (e.g. think tanks)</th>
<th>FY 2020</th>
<th>FY 2021</th>
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<tr>
<td>Other (e.g. spending related to ballot measures or referendums)</td>
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<td>No contribution</td>
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<th>FY 2021</th>
<th>FY 2022</th>
<th>FY 2023</th>
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<tbody>
<tr>
<td>Total contributions and other spending</td>
<td>Percentage of:</td>
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</table>

- We did not make any contributions to and spending for political campaigns, political organizations, lobbyists or lobbying organizations, trade associations and other tax-exempt groups, as defined in the information button.
- This information must be available in public domain.

- We do not track our annual monetary contributions and other spending for political and related purposes.
- Not applicable. Please provide explanations in the comment box below.
- Not known

**Info Text:**

**Question Rationale**
Although companies legitimately represent themselves in legislative, political, and public discourse, excessive contributions to political campaigns, lobbying expenditures, and contributions to trade associations and other tax-exempt groups may damage companies' reputations and create risks of corruption. With this question, we assess the total amount of money companies are allocating to organizations whose role is to create or influence public policy and the extent to which these amounts are disclosed to the public. Data Requirements The company shall report its total monetary contributions to political campaigns or organizations, lobbyists, trade associations, and other tax-exempt groups whose role is to influence political campaigns or legislation. This includes all direct and indirect spending, contributions or payments to: - Political campaigns, ballots measures or referendums. - Political organizations, trade associations or tax-exempt groups whose role is to influence political campaigns or legislative activities, including chambers of commerce, trade boards, and the like. This includes membership fees for trade associations, industry associations and business associations. - Registered lobbyists and lobbying groups. - Companies do not need to report the monetary value of in-kind giving, employee volunteering or management overheads related to the activities described above. - Note: PAC contributions by employees should not be included. Source: SASB and GRI.

**Disclosure requirements for partially public question:**
Additional credit will be granted for relevant publicly available evidence covering at least one figure in the last reported year. If no contributions were made for a specific item or category (e.g., zero political contributions in the last fiscal year), companies should publicly report this information. This should be publicly reported on the company's own website or on a transparency register. As this is a quantitative question, any non-public evidence is not required to support your answer but you may nonetheless upload evidence in “Documents” and reference this in the confidential additional comments. Coverage should be reported as a % of total operations, revenues, etc. as provided in the denominator question - indicating whether the provided data represents the entire organization or only parts of it. The percentage provided in the coverage field should not represent spending as a % of total spending or total revenues. - For example, if the numbers reported are only for operations in the US, and the US represents 50% of company revenues, then 50% should be reported as coverage.

**1.6.2 Largest Contributions & Expenditures**
Additional credit may be granted for publicly available evidence.

Did your company make any contributions to or expenditures to political campaigns or organizations, lobbying, trade associations, tax-exempt entities, or other groups whose role is to influence political campaigns or public policy and legislation? In this context, a "contribution" is the aggregate amount given during the fiscal period to an individual candidate, organization, ballot measure, or “issue area” or “topic” requiring lobbying efforts. Please see the Information Button for examples. **PAC contributions by employees should not be included.** Please also indicate if this reporting is available in your public reporting.

If you made less than three contributions, please select "No contribution" under "Type of organization" in the appropriate row.

- Yes, we made contributions or had expenditures. **Please indicate if this information is available in the public domain.**

**Issues and Topics**

<table>
<thead>
<tr>
<th>Currency</th>
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<tr>
<th>Issue or Topic</th>
<th>Corporate Position</th>
<th>Description of Position / Engagement</th>
<th>Total spend in FY 2023</th>
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<td>☐ Support with major exceptions</td>
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<td>☐ Support with minor exceptions</td>
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<td>☐ Oppose</td>
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**Other Large Expenditures**
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<tr>
<th>Name of organization, candidate or topic</th>
<th>Type of Organization</th>
<th>Total amount paid in FY 2023</th>
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<td>- National political organization</td>
<td>☐ Information available publicly</td>
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<td>- State or local political campaign, candidates or committees</td>
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<td>- Political Action Committee (PAC)</td>
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<td>- Lobbying, interest representation or similar</td>
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<td>- Not known</td>
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<td>- National political organization</td>
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<td>- State or local political campaign, candidates or committees</td>
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<td>Name of organization, candidate or topic</td>
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<td>☐ National political organization</td>
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<td>☐ Other, please specify</td>
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</table>

☐ Information available publicly

☐ No, we did not make any contributions or have any expenditures.

☐ This information must be available in the public domain.

☐ We do not track our largest contributions or expenditures for political and related purposes.

☐ Not applicable. Please provide explanations in the comment box below.

☐ Not known

**Info Text:**

Question Rationale Although companies legitimately represent themselves in legislative, political, and public discourse, excessive contributions to political campaigns, lobbying expenditures, and contributions to trade associations and other tax-exempt groups may damage companies' reputations and create risks of corruption. In this question, we ask for the largest contributions or expenditures to organizations whose primary role is to create or influence public policy and assess the extent to which this information is provided to the public. Key Definitions Largest contributions: In this context, a "contribution" is the aggregate amount given during the fiscal period to an individual candidate, organization, ballot measure, or "issue area" or "topic" requiring lobbying efforts. For example: Sugar taxes: The total amount of lobbying expense for the fiscal period shall be reported as one line item. The expenses may have been related to several activities around the world: a ballot initiative in California, legislation being considered by the US federal government and legislation pending in the UK. Drug pricing: The total amount of lobbying expense for the fiscal period shall be reported as one line item. The expenses may have been related to several state ballot initiatives in the US. Data Requirements Companies should report their largest “contributions” to political campaigns or organizations, lobbyists, trade associations, and other tax-exempt groups, related to individual candidates, organizations, ballot measure or referendum, or topic for which lobbying were contracted. This includes all contributions, donations, and membership fees towards trade associations, industry associations, and business associations. Companies do not need to report the monetary value of in-kind giving, employee volunteering or management overheads related to the activities mentioned above. If local legislation prevents you from making political or other contributions, please mark “Not applicable” and provide an explanation in the company comment box. There are two distinct aspects to this question: the two top issues and the three largest single contributions/payments. There may therefore be some overlap, if the spending on the issues is done by the trade associations. If your largest contributions go to trade/business associations, our preference is that you are able to inquire with the trade association(s) as to the percentage of your contribution allocated to lobbying for specific issues. If the trade association cannot provide this level of detail, an estimate will suffice. In the worst case, for the first part of this question, we ask you to report your direct lobbying expenditures only, even if the amounts are small. Note: Please do not include contributions to charities whose main purpose is something other than supporting specific political parties or causes, e.g., they primarily provide healthcare to an at risk population or food and shelter to the poor. Disclosure requirements for partially
public question. Additional credit will be granted for relevant publicly available evidence covering at least three of the largest contributions and expenditures described. This should be publicly reported on the company’s own website not via a third-party website or on a transparency register.

1.6.3 Lobbying and Trade Associations - Climate Alignment

This question requires publicly available information.

Does the company have a program to align its lobbying activities with the Paris Agreement and is it available publicly?

- Yes, the company has a program to align its lobbying activities with the Paris Agreement. Please indicate where this information is available in public reporting or corporate website.
  - Management system in place for lobbying activities and trade association memberships.
  - Governance framework for public policy engagement with clear accountabilities up to executive level.
  - Statement of our position on public policies relating to climate change, which is aligned with the Paris Agreement.
  - Reviewing and monitoring process to assess whether public policy engagements and lobbying are aligned with the Paris Agreement
    - For direct lobbying activities
    - For our trade associations
  - Clear framework for addressing misalignments between climate change policy positions of trade associations and our own climate position
  - Reporting on:
    - Climate policy positions and activities of trade associations
    - Climate-related direct lobbying activities
  - The program covers:
    - All jurisdictions where we have operations
    - Most jurisdictions
    - Some jurisdictions only

- No, the company does not publicly report on its climate alignment program.

- Not applicable. Please provide explanations in the comment box below.

Info Text:

Question Rationale As more and more companies commit to supporting the Paris Agreement with net-zero targets and climate strategies, there is increasing scrutiny from both investors and the public on the extent to which these public commitments are reinforced and not contradicted by the behavior of companies in lobbying. Trade associations can also be a powerful source of influence on public policy. There have been successful shareholder resolutions asking companies to disclose more about their lobbying activities and trade association memberships related to climate change. Companies have a responsibility to ensure their memberships do not contradict their climate strategies and to take action when they do. Aligning lobbying activities and trade association memberships with the Paris Agreement helps protect the reputation of companies and ensure action on climate change is consistent and strong. This question asks about the processes companies have in place to oversee, review and disclose their climate-related lobbying activities and trade association memberships, and to ensure alignment of these with the Paris Agreement. Key Definitions

Paris-Aligned lobbying: Lobbying and public policy engagements that are Paris-Aligned are supportive of legislation and regulation that will facilitate the achievement of the Paris Agreement goal to limit global warming to well below 2 degrees Celsius. It could also be referred to as 2-degree or 1.5-degree aligned, science-based, or net-zero by 2050 aligned. Examples of Paris-Aligned lobbying could be supporting measures that promote the growth of renewable energies or supporting the introduction of a carbon price that is aligned with reaching net zero by 2050. Direct lobbying activities: This encompasses lobbying by either in-house
lobbyists or third-party lobbyists paid for or otherwise engaged by the company. Lobbying activities include direct communication and contact with lawmakers or regulatory institutions for the purpose of influencing legislation, as well as responses to consultations and other engagements intended to influence legislation. Trade associations: may also be referred to as business or industry associations or groups. A trade association is a body, normally with a membership structure that exists to represent the interests of a specific industry. Trade associations can also exist on a cross-industry and national level, for example, a national or regional chamber of commerce. Review & monitoring process: A systematic process to assess the alignment of lobbying activities with the Paris Agreement. To be considered in this question, the processes must assess alignment with the Paris Agreement (or with the company’s stated positions on climate-related legislation and regulation if this is aligned with the Paris Agreement). For direct lobbying activities, the review process ideally takes place before lobbying has been conducted. For trade associations, the review process can take place on a regular basis or whenever new associations are joined and should assess whether the trade association supports the Paris Agreement through its lobbying and public policy engagements. Framework for addressing misalignments: Where misalignments between a trade association’s lobbying activities and the goals of the Paris Agreement have been identified, companies should have an established framework for how they deal with this. The framework should include at least two of the following options: public statements distancing the company from the misalignment, engagement with the trade association with clear timelines and an escalation process if unsuccessful, leaving the trade association, or forming proactive coalitions to counter the non-Paris-aligned lobbying.

Data Requirements This question requires public evidence. This question can be marked “Not applicable” only if all contributions and spending on lobbyists and trade associations are prohibited by law. Please note that evidence must be available in the public domain, and this must apply to all jurisdictions where your company operates in order to be accepted. If only one out of lobbying and trade association memberships is prohibited and not the other, please follow the approach below. If your company either does not undertake any lobbying activities or is not a member of any trade association, in any jurisdiction, because one or the other is prohibited by law or your company’s own code of conduct, and this is clearly stated in the public domain, then the respective options can be ticked under “Review and monitoring process”, “Reporting on” and, in the case of no trade association memberships only, “Clear framework for addressing misalignments”. References
Guide for responsible corporate engagement in climate policy, United Nations Global Compact Caring for Climate Report Global Standard on Responsible Corporate Climate Lobbying Company lobbying and climate change: good governance for Paris-aligned outcomes, Grantham Research Institute on Climate Change and the Environment Trade Associations and their Climate Policy Footprint, InfluenceMap

1.6.4 MSA Policy Influence

In this section, we include a performance score on the Corporate Sustainability Monitoring with the objective of verifying the company’s involvement and management of crisis situations that can have a damaging effect on reputation. The evaluation will be filled in by the responsible analyst of your industry. No additional information is required from your company.

Info Text:
Based on a Media and Stakeholder Analysis (MSA), the consistency of a company’s behavior and management of crisis situations is reviewed in line with its stated principles and policies. Results of the MSA range from no impact to high impact - the latter reflecting serious reputational risks with consequences on the company's bottom line (e.g. legal liabilities or high probability of imminent legal liabilities). In addition, the overall quality of the management response to a situation is assessed, evaluating whether a company has transparently and proactively managed the issue.

1.7 Tax Strategy

Tax competition between tax territories (countries or regions within countries) has left room for companies to optimize their tax spending. While tax optimization has a positive impact on profitability and hence company value, a too-aggressive tax strategy might not be sustainable in the mid- to long-term and adds some risk to long-term profits. First, there is a reputational risk because of increased public and regulatory scrutiny which could result in lower brand value. Second, the relationship with the host country may be negatively impacted.
This could result in approval delays or rejection of expansion projects or, in the worst cases, companies risk losing their license to operate. Third, earnings might be impacted if the tax authorities decide to change tax regulation which leads to direct financial risks. Finally, economic development risk arises if governments receive inadequate tax receipts for funding local infrastructure or education.

1.7.1 Tax Strategy and Governance

This question requires publicly available information.

Does the company have a policy on tax strategy and governance at a group level and is it available publicly?

- Yes, the company has a group-wide policy on tax strategy and governance. Please indicate where this information is available in public reporting or corporate website.
  - A commitment to compliance with the spirit as well as the letter of the tax laws and regulations in the countries in which the company operates
  - A commitment not to use tax structures without commercial substance
  - A commitment not to transfer value created to low tax jurisdictions
  - A commitment to undertake transfer pricing using the arm’s length principle
  - A commitment not to use secrecy jurisdictions or so-called "tax havens" for tax avoidance
  - An approval process of the tax policy by the board of directors

- No, the company does not publicly report on a group-wide policy for tax strategy and governance.

- Not applicable. Please provide explanations in the comment box below.

Info Text:

Question Rationale: Tax avoidance strategies are usually set up in a legally sound way. Therefore, general statements about a company's intention to comply with all tax laws and regulations in its countries of operation are not sufficient. Every company should be able to give a coherent justification of their approach to key tax issues such as the use of tax minimization techniques in line with their approach to other CSR issues. The adoption of a formal tax policy serves to guide company practices and provide investors, regulators and other external stakeholders with an idea of the company’s tax risk profile, against which practices and disclosures can be compared. An effective policy should be overseen by the board of directors, created in conjunction with relevant senior management, and regularly reviewed to ensure emerging risks are addressed. This question seeks to determine if there is a group-wide tax policy or strategy available in the public domain that addresses sensitive or high-risk tax issues in a clear and sustainable way.

Data Requirements: While many companies have group-wide tax accounting policies with clearly defined roles and responsibilities within the organization in place, we specifically look for taxation policies that address issues such as responsible taxation, transparency, transfer pricing, etc., going beyond minimum legal tax disclosure requirements. Supporting evidence: This question
1.7.2 Tax Reporting

This question requires publicly available information.

Does the company report on key business, financial and tax information for each tax jurisdiction in which they operate and is it available publicly?

- Yes, the company reports on key business, financial and tax information for each tax jurisdiction. Please indicate where this information is available in public reporting or corporate website.
  - Names of all the resident entities
  - Primary activities
  - Number of employees
  - Revenue
  - Profit (Loss) before tax
  - Income tax accrued (current year)
  - Income tax paid

- No, the company does not publicly report on key business, financial and tax information for each tax jurisdiction.

- Not applicable. Please provide explanations in the comment box below.

Info Text:

Question Rationale Leading companies have realized that public reporting on their revenues, operating profits, and tax on a country-by-country basis helps build trust in their corporation and complements the reporting on their broader economic contribution. In combination with key information about the names and tax residence of all constituent entities, the main activities by tax jurisdiction as well as the average number of employees help investors better understand a company’s tax profile and potential exposure to tax risks. If tax payments differ from the expected rates in a given jurisdiction, proactive companies can steer and facilitate the discussion about their tax contributions with all their stakeholders by explaining the reasons behind the difference in their reporting. In this question, we aim to identify to what extent companies report key information about their tax contributions in all tax jurisdictions where the entities included in their organization’s audited consolidated financial statements are resident for tax purposes.

Key Definitions

- A constituent entity is a separate business unit, or subsidiary, of a multi-national enterprise group that is included in the consolidated group for financial reporting purposes. This includes a permanent establishment if a separate income statement is prepared for regulatory, financial, internal management, or tax purposes.
- A description of the primary activities by jurisdiction can be in the form of a short statement regarding the nature of the trade in the respective location (e.g., Sales, Marketing or Distribution, Manufacturing or Production, Purchasing or Procurement, R&D, Holding or Managing Intellectual Property, etc.).
- Revenues: All revenues, (extraordinary) gains and income, or other inflows shown in the financial statement prepared in accordance with the applicable accounting rules relating to profit and loss, such as the income statement or profit and loss statement, should be reported as revenues.
- Profit (Loss) before tax: Also referred to as pre-tax profit (loss), pre-tax income, or earnings before tax (EBT). We also accept operating profit, earnings before interest and tax (EBIT).
- Income Tax Accrued (Current year) is the amount of accrued current tax expense recorded on taxable profits or losses for the reporting fiscal year of all constituent entities resident for tax purposes in the relevant tax jurisdiction irrespective of whether or not the tax has been paid (e.g., based on a preliminary tax assessment).
- Income Tax Paid (on Cash Basis) is the amount of corporate income taxes actually paid during the reporting fiscal year, which should thus include not only advanced payments fulfilling the relevant...
fiscal year’s tax obligation but also payments fulfilling the previous year(s)’ tax obligation (e.g., payment of the unpaid balance of corporate income tax accrued in relation to the previous year(s), including payments related to reassessments of previous years), regardless of whether those taxes have been paid under protest. Consolidated taxes paid that include other items such as value-added tax, social security taxes, regional or industry-specific taxes are not accepted. The amount of Income Tax Accrued (Current Year) and Income Tax Paid (on Cash Basis) should be reported independently. The Number of Employees should reflect the average number of FTEs (full-time equivalents) during the reporting fiscal year, or a similar number, provided that it is applied consistently across the jurisdictions. Reasonable rounding is permissible if it does not materially distort the relative distribution of employees across tax jurisdictions. Data Requirements Please note: The tax data disclosed should fully reconcile with the corresponding information in the consolidated income statement. To receive credit for comprehensive country-by-country reporting, we expect the countries reported on to cover at least 90% of the respective financial metric. This means that in order to receive credit for all boxes, we expect distinct disclosure for each of the financial metrics below, disclosing at least 90% of the respective consolidated total values in the income statement: - Revenues - Profit (loss) before tax - Income tax accrued (current year) - Income tax paid (cash basis) To receive credit for public reporting on the non-financial metrics (i.e., names of constituent entities, the primary activities, and the number of employees), companies are expected to clearly state that the information includes all constituent entities of the organization. Additionally, in order for any of these non-financial metrics to be accepted, at least one of the financial metrics mentioned above has to be accepted as well. In the case at least 90% of the respective metric (e.g., revenues) comes from one country (e.g., “domestic”), the remaining amount of the respective metric has to be summarized as “Other”, “Foreign”, “International” or similar. The disclosed metrics must fully reconcile with the corresponding figures in the consolidated income statement. If there is more than one constituent entity in a jurisdiction, the numbers can be reported on an aggregated basis at a jurisdictional level. Accordingly, data should be reported on an aggregated basis, regardless of whether the transactions occurred cross-border or within the jurisdiction, or between related parties or unrelated parties. If possible, however, companies should report consolidated figures if consolidated data can be reported for each jurisdiction. Companies should state clearly if the data is reported on an aggregated or consolidated basis. References OECD / G20: Base Erosion and Profit Shifting – Action 13

1.7.3 Effective Tax Rate

This question requires publicly available information.

Please complete the following table related to your reported tax rate (income statement) and cash tax rate (cash flow statement) for the last two years. Please indicate where this information is available in your financial reporting. Additionally, please select (if necessary) why the reported tax rate and/or the cash tax rate might be lower than expected. Please see the information button for additional information.

Currency:

<table>
<thead>
<tr>
<th>Financial Reporting</th>
<th>FY 2022</th>
<th>FY 2023</th>
<th>Calculated Average Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Earnings before Tax</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reported Taxes</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cumulative acceptable adjustments* (see below)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Effective Tax Rate (in %)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Automatic calculation of your Reported Taxes in the two-year period (with adjustments) divided by your Earnings before Tax in the two-year period.
<table>
<thead>
<tr>
<th>Reason</th>
<th>Tax Impact FY 2022</th>
<th>Tax Impact FY 2023</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Group-wide net operating losses (in FY2022 or FY2023)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Single jurisdiction tax code (maximum 10% sales abroad and domestic corporate income tax rate below the posted industry group average)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non-recurring (one time) operating losses in own operations</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Net operating losses from prior periods and/or acquired companies</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Timing - net deferred tax assets/liabilities and major issues outside of the two year period reported (including accounting adjustments for prior reporting periods due to major tax policy changes)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Note: If the calculated average tax rate and/or cash tax rate is lower than the industry group averages shared via the information text, please specify the reason why, indicate the tax amount per item and provide explanations in the table below. Please also indicate where this information is available in your reporting or corporate website.

If the aspect reduced your tax burden (tax benefit), please indicate the impact as a negative number, however if the aspect increased your tax burden (tax expense), please indicate the impact as a positive number. On the basis of the numbers inputted, you will see an autocalculation of the rate above: please double-check that figure to ensure you have reported these aspects with the correct sign.

**Listed companies** are required to provide links to public reports or corporate websites. **Non-Listed companies** may provide internal documents and/or links public reports or corporate websites.

We do not report this information.

Not applicable. Please provide explanations in the comment box below.

Not known

**Info Text:**

*Automatic calculation of your Cash Taxes Paid in the two-year period divided by your Earnings before Tax in the two-year period.*
Question Rationale This question aims to assess whether a company’s tax rate may be unsustainable in a global context, based on the reported tax rate and cash tax rate for the last two years. Governments around the world have been increasingly critical of base erosion and profit shifting (BEPS) which enables tax avoidance through the exploitation of gaps and mismatches in tax rules, allowing companies to shift profits to low or no-tax jurisdictions. Some of the resulting corporate structures and agreements with local governments may be drawn up in a legally sound way, while others may not, even if they may currently appear so. Long-term financial risks can also develop from arrangements that are later determined to be eroding the tax base of other countries or provide an unfair subsidy. These arrangements may be deemed illegal, and fines and penalties imposed, or new regulations may be implemented which raise the tax obligation of companies. At the same time, regulatory bodies are increasing the enforcement of existing rules. The OECD commenced the BEPS project in 2015 to address these issues and the EU has been aggressive in targeting companies and countries that it believes have illegal agreements, for example, those in violation of state aid rules. More recently, the European Commission announced in March 2018 that it has proposed: 1) to reform corporate tax rules so that profits are registered and taxed where businesses have significant interaction with users through digital channels; and 2) an interim tax on certain revenues from digital activities. We expect this type of cooperation and regulation to continue, targeting companies and countries with low tax rates, and removing the loopholes and agreements that allow companies to operate with relatively low rates in the long term. In addition to the regulatory developments listed above, consumers (and voters) are becoming increasingly aware of companies that pursue aggressive tax strategies as recent controversies around several major multinational companies have shown. Therefore, both reputationally and politically there are growing risks of a mean reversion or even financial penalties associated with these practices. Key Definitions Tax rate: The percentage at which an individual or a corporation is taxed. Reported taxes: The amount of taxes imposed on an organization as this is reported on the income statement. Cash taxes: The amount of taxes paid to governmental authorities as indicated in the cash flow statement of that fiscal year. – For example, for FY 2018 please provide all cash taxes paid during FY 2018, regardless of the period the tax liability arose in. Special note for companies subject to Zakat (Islamic tax) Zakat is a tax on assets, therefore qualifies as a wealth tax, not an income tax. In this question, we focus on income tax only. Therefore, Zakat should be excluded from the company’s Reported Taxes and Cash Taxes paid. If the company operates in a single jurisdiction, and only owes Zakat as taxes (and not income tax), please mark this question “Not applicable”. Please leave both tables empty and provide explanations in the comment box below. Please follow the same approach if the company operates in a single jurisdiction and reports on income tax and zakat all combined (e.g., taxation and zakat). If the company does not operate in a single jurisdiction but only reports on zakat and tax paid all combined, please leave the cash tax paid box empty, and provide explanations in the comment box below. Tax amount: (in table explaining low taxes) if the taxes reported or paid in cash are lower than expected, companies may have non-recurring items (e.g., net operating losses from acquired companies, major write-offs that cause temporary losses, tax settlement, etc.) that explain the low rate. The tax amount entered into the table is the amount of tax that should be added back to the reported or cash tax amounts actually reported, leading to the higher reported tax rate or cash tax rate. Group-wide net operating losses: “Net operating losses (NOL) are a tax credit created when a company’s expenses exceed its revenues, generating negative taxable income as computed for tax purposes. NOL can be used to offset positive taxable income, reducing cash taxes payable. NOL can be carried back 2 years to recover past taxes paid and forward 20 years to offset taxable income in future periods. After 20 years, any remaining NOL expire and are no longer available for use. NOL carried forward are recorded on the balance sheet as deferred tax assets (DTA).” Source: Macabacus In the case a company has group-wide losses, there is no associated amount since there is no income. Non-recurring (one-time) losses in own operations: Non-recurring (one-time) losses are irregular or infrequent losses (e.g., write-off of a large investment, large settlement or fine) that would offset ongoing income generated. Net operating losses from acquired companies: This option refers to “taxable acquisitions in which the acquired net assets are stepped-up for tax purposes, the target’s net operating losses (NOL) may generally be used immediately by the acquirer to offset the gain on the actual or deemed asset sale.” Source: Macabacus Single jurisdiction tax code: (e.g., low domestic rate and maximum 10% sales abroad) Certain countries (e.g., Ireland) have a low tax rate for companies. Therefore, certain countries will have a lower tax rate than the average in the industry. If your company has more than 90% of sales domestically, this option can be ticked. Timing – Issues outside of the two years period: This option refers to an event that happened outside of the two years and was carried forward to the two last fiscal years. This could be losses from a company's own operations as described above, or due to a tax deal reached with the government. The net change in valuation allowance can be accepted as a timing issue, provided the specific effect is clearly described in the public reporting. Data Requirements Earnings before Tax (EBT) may also be known as Operating Income before Tax or Profit before Tax and is often a unique line item on the income statement. Two years of data are required. To get a sense of whether your company’s calculated average tax rate and/or cash tax rate is lower than it might be expected by a stakeholder*, please review the Average Effective Tax Rate & Cash Tax Rate for each of the 24 GICS® Industry Groups, on page
108 of the CSA Handbook. In order to establish these industry group-specific thresholds, we’ve updated our original, Bloomberg-based research on the basis of the data we collected via the 2023 Corporate Sustainability Assessment. We took each company's average effective tax rate, and cash tax rate, respectively, and averaged over all the rates reported for that industry group worldwide. Disclosure requirements: Disclosure of the following items for the last two fiscal years: - Earnings before tax - Reported taxes - Reported tax rate - Cash taxes paid - Cash tax rate As stated in the question text: completion of the second table of the question is not required, however, if it is completed, we expect supporting public evidence. If any of the following items have been selected, then these should be reported in the attached public evidence, as well as the corresponding tax impact (if relevant for the selected option): - Group-wide net operating losses - Non-recurring (one-time) operating losses in own operations - Net operating losses from acquired companies - Single jurisdiction tax code (e.g., low domestic rate and maximum 10% sales abroad) - Timing - issues outside of the two-year period reported A private document or comment (e.g., company's comment provided in the confidential comment box) cannot be accepted as a supporting document for the second table, unless it is verifiable in the public domain. For all of the above: Listed and/or publicly owned companies are required to provide links to public reports or corporate websites. Non-listed companies are required to provide the following evidence, depending on the type of company: - Family-owned companies and Privately owned companies are required to provide public reports, corporate websites, or internal documents. - Cooperatives are required to provide public reports, corporate websites, or internal documents. - State-owned companies are required to provide tax reporting in the public domain as their key stakeholder is the general public. References - Average Effective Tax Rate & Cash Tax Rate for each of the 24 GICS® Industry Groups, please see the CSA Handbook, page 108 - Organization for Economic Co-operation and Development (OECD) framework “Base Erosion and Profit Shifting (BEPS)” - Macabacus: https://macabacus.com/taxes/net-operating-loss

1.7.4 MSA Tax Strategy

In this section we include a performance score on the Corporate Sustainability Monitoring with the objective of verifying the company’s involvement and management of crisis situations that can have a damaging effect on reputation. The evaluation will be filled in by the responsible analyst of your industry. No additional information is required from your company.

Info Text:
Based on a Media and Stakeholder Analysis (MSA), the consistency of a company’s behavior and management of crisis situations is reviewed in line with its stated principles and policies. Results of the MSA range from no impact to high impact - the latter reflecting serious reputational risks with consequences on the company’s bottom line (e.g. legal liabilities or high probability of imminent legal liabilities). In addition, the overall quality of the management response to a situation is assessed, evaluating whether a company has transparently and proactively managed the issue.

1.8 Information Security/ Cybersecurity & System Availability

Due to the current trend of digitization, including but not limited to cloud computing, online market places and payments etc., it is crucial that access to network, IT systems and data is assured at all times. As a result, lower than agreed upon system performance or service disruptions can result in higher costs and reputational risk for companies. The main risks stem from technical failure, human error, malicious attacks, weather events, natural disasters or terrorist attacks. Managing such risks, including contingency plans, is crucial to ensuring business continuity. The criterion focuses on how well companies are prepared to prevent IT system failures and major information security/cybersecurity incidents and if they can react appropriately in case of such events. It also evaluates whether companies have experienced IT infrastructure / information security/ cybersecurity incidents in the past and if there was material financial impact.

Over the past decade, the number of information security breaches has been growing exponentially. The many incidents and their related costs have shown that information security/cybersecurity has become a financially material issue which has to be managed diligently to protect corporate value. The costs of cybercrime are manifold and can impact the company in different ways. Internal costs are operational costs and relate to dealing with the cybercrime and incidence prevention. External costs include the consequences
of the cyber-attack such as the loss or theft of sensitive information, operations' disruption, fines and penalties, infrastructure damage or revenue losses due to loss of customers. The criterion focuses on how well companies are prepared to prevent major information security/cybersecurity incidents and if they can react appropriately in case of an attack. It also evaluates whether companies have experienced information security/cybersecurity incidents in the past and what the financial consequences were.

1.8.1 IT Security/ Cybersecurity Governance

Additional credit may be granted for publicly available evidence.

Are the board of directors and executive management engaged in the information security/cybersecurity strategy and review process?

☐ Yes, we have a director on the board with relevant background in IT engaged on the cybersecurity strategy process and someone in the Executive Management team who oversees the company’s cybersecurity strategy:

☐ Board Responsibility

Please indicate the Board member who oversees the cybersecurity strategy together with his/her experience and indicate this person’s membership in the committee responsible for the oversight of cybersecurity.

Please provide supporting evidence:

<table>
<thead>
<tr>
<th>Board Member</th>
<th>Please indicate the Board member’s membership in the committee which oversees cyber security strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name of board member:</td>
<td></td>
</tr>
<tr>
<td>☐ Relevant experience and previously held positions:</td>
<td></td>
</tr>
<tr>
<td>☐ If publicly available, please indicate where this information can be found in your public reporting or corporate website.</td>
<td></td>
</tr>
<tr>
<td>☐ Cybersecurity / information security committee</td>
<td></td>
</tr>
<tr>
<td>☐ Risk committee</td>
<td></td>
</tr>
<tr>
<td>☐ Audit committee</td>
<td></td>
</tr>
<tr>
<td>☐ Not known</td>
<td></td>
</tr>
</tbody>
</table>

☐ Executive Management Responsibility

Please indicate which role or function within or reporting directly to the Executive Management team is responsible for overseeing cybersecurity within the company.

Please provide supporting evidence:

☐ If publicly available, please indicate where this information can be found in your public reporting or corporate website.

☐ Chief Information Security Officer (CISO) / Chief Security Officer (CSO)

☐ Chief Technology Officer (CTO) / Chief Information Officer (CIO) or similar

☐ CEO / COO / CRO or similar with clear responsibility for IT security/cybersecurity

☐ We do not have anyone who oversees cybersecurity in the executive management team

☐ Not known

☐ No, we don’t have a director on the board with relevant background in IT engaged on the cybersecurity strategy process and someone in the Executive Management team who oversees the company’s cybersecurity strategy.

☐ Not applicable. Please provide explanations in the comment box below.

☐ Not known

Info Text:
Question Rationale Due to the current trend of digitization, including but not limited to cloud computing, online marketplaces, and payments, etc., it is crucial that access to networks, IT systems, and data is assured at all times. As a result, lower than agreed upon system performance or service disruptions can result in higher costs and reputational risk for companies. The main risks stem from technical failure, human error, malicious attacks, weather events, natural disasters, or terrorist attacks. Managing such risks, including contingency plans, is crucial to ensuring business continuity. Over the past decade, the number of information security breaches has grown exponentially with some attacks reaching unprecedented scales and the cyber threat landscape continues to grow and evolve, abusing existing and new technologies and exploiting vulnerable users. These incidents and the related costs have shown that information security/cybersecurity has become a financially material issue that must be diligently managed to protect corporate value. The costs of cyberattacks are manifold and can impact the company in different ways. Internal costs are operational costs and relate to dealing with cybercrime and incidence prevention. External costs include the consequences of the cyber-attack such as the loss or theft of sensitive information, operations’ disruption, fines and penalties, infrastructure damage, or revenue losses due to loss of customers. Thus, ensuring the security and resilience of networks and information systems is critical. All boards should have the ability to understand cyber threats and assess management’s capability of dealing with Cyber-related issues according to the National Association of Corporate Directors (NACD). However, also senior executives, like CISO, CSO or CIO, must have the necessary leadership, operational and strategic skills to understand and face the risk. A cyber-risk committee would have the role to encourage both the board and executives to give cyber-security issues a high priority and to prioritize them with strong oversight. The question focuses on whether the company has the appropriate governance to prevent IT system failures and major information security/cybersecurity incidents. Key Definitions CISO: A chief information security officer (CISO) is the senior-level executive in an organization responsible for establishing and maintaining the organization’s vision, strategy, and program to ensure information assets and technologies are well protected. As the highest-ranking cybersecurity executive, the chief information security officer (CISO), or alternatively the Chief Information Officer (CIO), is responsible for establishing and maintaining the enterprise strategy and processes that protect information assets. CSO: A Chief Security Officer (CSO) is the senior-level executive responsible for the physical security of a company, including its communication and business systems. CSO’s responsibility is to protect people, assets, technology, and infrastructure. Cybersecurity: Cybersecurity is the body of technologies, processes, and practices designed to protect networks, systems, computers, programs, and data from attack, damage, or unauthorized access (according to SEC). Experience: Relevant experience could be past experience in the implementation of IT, information security or cybersecurity or operational responsibility for IT as a senior executive of a company. In addition for Board Member, non-technical experience as a senior executive of an IT company (such as SVP Marketing, Sales etc.) is not valid. Academic experience in IT is not considered relevant. Information security: The protection of information and information systems from unauthorized access, use, disclosure, disruption, modification, or destruction in order to provide confidentiality, integrity, and availability (according to NIST). Information System: Applications, services, information technology assets, or other information handling components (according to ISO). IT security: IT security is the process of implementing measures and systems designed to securely protect and safeguard information utilizing various forms of technology. IT security is thus considered a bit broader than cybersecurity. Important note: Throughout the whole criterion we always refer to IT security, cybersecurity or information security according to the definitions above. For the appraisal of the criterion, we will treat “IT security”, “information security” and “cybersecurity” equally. Data Requirements Disclosure requirements for partially public question: Additional credit will be granted for relevant publicly available evidence covering: - The board member’s membership in the committee which oversees cybersecurity strategy - The role or function within or reporting directly to the Executive Management team responsible for overseeing cybersecurity within the company For executive management responsibility, please indicate which role or function within or reporting directly to the Executive Management team is responsible for overseeing cybersecurity within the company. The best practice is to have a CISO or CSO as part of the Executive Management team or reporting directly to it. In case another function has responsibility for IT security/cybersecurity and is part of or reporting directly to the Executive Management team, please select the second or third option accordingly.

1.8.2 IT Security/ Cybersecurity Measures

Have you implemented policies and procedures for all employees in order to ensure that they are aware of threat issues and the importance of information security/cybersecurity?

- Yes, we have implemented policies and procedures for all employees
An information security/cybersecurity policy is internally available to all employees. Please provide the relevant document:

Information security/cybersecurity awareness training. Please explain and provide supporting evidence:

A clear escalation process which employees can follow in the event an employee notices something suspicious is in place. Please explain and provide supporting evidence:

Information security/cybersecurity is part of the employee performance evaluation (e.g. disciplinary actions). Please explain and provide supporting evidence:

- No, we have not implemented policies and procedures for employees with access to critical information.
- Not applicable. Please provide explanations in the comment box below.
- Not known

Info Text:
Question Rationale Due to the current trend of digitization, including but not limited to cloud computing, online marketplaces, and payments, etc., it is crucial that access to networks, IT systems and data is assured at all times. As a result, lower than agreed upon system performance or service disruptions can result in higher costs and reputational risk for companies. The main risks stem from technical failure, human error, malicious attacks, weather events, natural disasters or terrorist attacks. Managing such risks, including contingency plans, is crucial to ensuring business continuity. Over the past decade, the number of information security breaches has grown exponentially with some attacks reaching unprecedented scales and the cyber threat landscape continues to grow and evolve, abusing existing and new technologies and exploiting vulnerable users. These incidents and the related costs have shown that information security/cybersecurity has become a financially material issue that must be diligently managed to protect corporate value. The costs of cyberattacks are manifold and can impact the company in different ways. Internal costs are operational costs and relate to dealing with cybercrime and incidence prevention. External costs include the consequences of the cyber-attack such as the loss or theft of sensitive information, operations’ disruption, fines and penalties, infrastructure damage or revenue losses due to loss of customers. Thus, ensuring the security and resilience of networks and information systems is critical. The question assesses what security measures are in place to ensure employees are aware of threat issues and the importance of information security/cybersecurity. Key Definitions IT security: The process of implementing measures and systems designed to securely protect and safeguard information utilizing various forms of technology. IT security is thus considered a bit broader than cybersecurity. Information System: Applications, services, information technology assets, or other information handling components (according to ISO). Cybersecurity: Body of technologies, processes and practices designed to protect networks, systems, computers, programs and data from attack, damage or unauthorized access (according to SEC). Information security: The protection of information and information systems from unauthorized access, use, disclosure, disruption, modification, or destruction in order to provide confidentiality, integrity, and availability (according to NIST). Important note: Throughout the whole criterion we always refer to IT security, cybersecurity or information security according to the definitions above. For the appraisal of the criterion we will treat "IT security", "information security" and "cybersecurity" equally. Disclosure Requirements The document(s) you attached will be used to verify your response. - The supporting documents do not need to be available in the public domain. - If a question text field is available, a comprehensive answer in that field can be accepted instead of a supporting document. - Any response that cannot be verified in the attached document(s) or via the information provided in the related question text field (if available) will not be accepted.

1.8.3 IT Security/ Cybersecurity Process & Infrastructure

This question assesses if companies have the right processes in place to prevent IT system interruptions and cyberattacks and if they are well-prepared to react in case of such events.

- Incident Response
Do you have business continuity / contingency plans and incident response procedures in place and how often do you test them? Please provide supporting evidence of how often these plans/procedures are tested.

❍ Yes, and we test them at least semi-annually
❍ Yes, and we test them at least annually
❍ Yes, but frequency is less than yearly or not specified
❍ No, we do not have such plans and procedures in place

Certification
Is your IT infrastructure and information security management system certified to ISO 27001, NIST or similar?

❍ Yes, the following percentage of our IT infrastructure has been certified:

❍ No, our IT infrastructure has not been certified.

External Verification and Vulnerability Analysis
Please indicate if there are other additional procedures implemented to assure the security of the IT infrastructure / information security management systems.

❏ Our IT infrastructure and information security management systems have been audited by external auditors in the last fiscal year. Please provide letter of opinion from the external auditor.

❏ We conduct third-party vulnerability analysis. Please provide supporting evidence:

❏ As part of third-party vulnerability analysis, we conduct simulated hacker attacks. Please provide supporting evidence:

Breaches
Has your company experienced breaches of information security?

❍ We collect data on information security/cybersecurity breaches.

Please note that if you did not have any information breaches, 0 should be entered in the corresponding box in the table. If you do not know the information, please leave the box empty. See the information text for more information.

Supporting evidence:

<table>
<thead>
<tr>
<th>2023</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of information security breaches</td>
</tr>
<tr>
<td>Total number of clients, customers and employees affected by the breaches</td>
</tr>
</tbody>
</table>

❍ We do not collect data on information security/cybersecurity breaches.

❍ We do not have processes and infrastructure in place to prevent and/or respond to cyberattacks.

❍ Not applicable. Please provide explanations in the comment box below.

❍ Not known

Info Text:
Question Rationale Due to the current trend of digitization, including but not limited to cloud computing, online marketplaces and payments, etc., it is crucial that access to networks, IT systems and data is assured at all times. As a result, lower than agreed upon system performance or service disruptions can result in higher costs and reputational risk for companies. The main risks stem from technical failure, human error, malicious attacks, weather events, natural disasters or terrorist attacks. Managing such risks, including contingency plans, is crucial to ensuring business continuity. Over the past decade, the number of information security breaches has grown exponentially with some attacks reaching unprecedented scales and the cyber threat landscape continues to grow and evolve, abusing existing and new technologies and exploiting vulnerable users. These incidents and the related costs have shown that information security/cybersecurity has become a financially material issue that must be diligently managed to protect corporate value. The costs of cyberattacks are manifold and can impact the company in different ways. Internal costs are operational costs and relate to dealing with cybercrime and incidence prevention. External costs include the consequences of the cyber-attack such as the loss or theft of sensitive information, operations' disruption, fines and penalties, infrastructure damage or revenue losses due to loss of customers. Thus, ensuring the security...
and resilience of networks and information systems is critical. The question focuses on how well companies are prepared to prevent major IT infrastructure and information security/cybersecurity incidents and if they can react appropriately in the event of such events. Key Definitions IT security: IT security is the process of implementing measures and systems designed to securely protect and safeguard information utilizing various forms of technology. IT security is thus considered a bit broader than cybersecurity. Information System: Applications, services, information technology assets, or other information handling components (according to ISO). Cybersecurity: Cybersecurity is the body of technologies, processes and practices designed to protect networks, systems, computers, programs and data from attack, damage or unauthorized access (according to SEC). Information security: The protection of information and information systems from unauthorized access, use, disclosure, disruption, modification, or destruction in order to provide confidentiality, integrity, and availability (according to NIST). Vulnerability analysis: The analysis that a company conducts for defining, identifying, classifying, and prioritizing vulnerabilities in computer systems, applications, and network infrastructures. This provides the organization doing the assessment with the necessary knowledge, awareness and risk background to understand the threats to its environment and react appropriately. Information security breaches: These are defined as unauthorized access to computer data, applications, networks, devices, protected systems and data. Cybercriminals or malicious applications bypass security mechanisms to reach restricted areas. Number of clients, customers and employees affected: The entity shall disclose the total number of unique clients, customers and employees who were affected by data breaches, which includes all those whose personal data was compromised in a data breach (accounts that the entity cannot verify as belonging to the same client, customer or employee shall be disclosed separately). Important note: Throughout the whole criterion we always refer to IT security, cybersecurity or information security according to the definitions above. For the appraisal of the criterion we will treat “IT security”, “information security” and “cybersecurity” equally. Data Requirements Vulnerability analysis: We expect to see evidence that a vulnerability analysis was conducted and that this analysis includes simulated hacker attacks. The analysis and testing should be performed by a third party with appropriate certification. Please note: Non-IT companies can also calculate the percentage of certified IT infrastructure based on the percentage of certified IT products by external vendors. Supporting evidence: - The document(s) you attached will be used to verify the qualitative part of your response. If a question text field is available, a comprehensive answer in that field can be accepted instead of a supporting document. Any qualitative response that cannot be verified in the attached document(s) or via the information provided in the related question text field (if available) will not be accepted. - Quantitative figures provided in the response do not need supporting evidence. You may still provide a reference using the reference clip. This could include examples of the underlying calculations or approaches to data aggregation used to compile the provided quantitative information. - The supporting documents do not need to be available in the public domain. References External management standards and frameworks include but are not limited to: ISO/IEC 27001:2022 – Information technology – Security techniques – Information security management systems – Requirements Barrett, M. (2020), Framework for Improving Critical Infrastructure Cybersecurity Version 1.1, NIST Cybersecurity Framework, [online], https://doi.org/10.6028/NIST.CSWP.04162018, https://www.nist.gov/cyberframework

1.8.4 MSA Information Security/ Cybersecurity & System Availability

In this section we include a performance score on the Corporate Sustainability Monitoring with the objective of verifying the company’s involvement and management of crisis situations that can have a damaging effect on reputation. The evaluation will be filled in by the responsible analyst of your industry. No additional information is required from your company.

Info Text:
Based on a Media and Stakeholder Analysis (MSA), the consistency of a company’s behavior and management of crisis situations is reviewed in line with its stated principles and policies. Results of the MSA range from no impact to high impact - the latter reflecting serious reputational risks with consequences on the company's bottom line (e.g. legal liabilities or high probability of imminent legal liabilities). In addition, the overall quality of the management response to a situation is assessed, evaluating whether a company has transparently and proactively managed the issue.
1.9 Sustainable Finance

Financial institutions have an essential role to play in addressing sustainability challenges, facilitating the transition to a low-carbon economy and stimulating sustainable development. In identifying and addressing growing environmental challenges and the associated risks, financial institutions can benefit by leveraging their expertise in financial innovation. The opportunity to offer new financial instruments allows financial institutions to develop new revenue streams and build trust among stakeholders.

The principal focus of the criterion is to look at the approaches companies are taking to integrate environmental, social and governance factors in each of the business segments and to look at which innovative offerings across all business operations (retail banking, wholesale/corporate/investment banking, asset management, wealth management, security exchanges, insurance underwriting) are available.

1.9.1 Sector Activities

Please indicate which activities the company operates in and derives at least 5% of revenues from. For project finance, tick the option if the company has project finance operations, even if this segment represents less than 5% of revenues.

We are active in one or more of the following activities:

- Investing & Stewardship
- Asset Management & Custody Activities
- Financing
- Commercial Banking (corporate) and Investment Banking
- Commercial Banking (consumer)
- Project finance
- Advisory
- Investment Banking & Brokerage
- Insurance Underwriting
- Insurance (non-life / non-health)
- Investing
- Investment Holdings/Multi-sector Holdings
- Other
- Stock exchanges
- Index licensing
- Financial Data & Analytics

We do not operate in any of the above activities. Please provide an explanation of the company's business in the comment box.

Info Text:

Question Rationale The purpose of this question is to collect information on the segments in which your institution is active. Tick the relevant options if your company operates in that segment and derives more than 5% of its revenue from that segment. For project finance, tick the option if you have project finance operations, regardless of the percentage of revenue derived from them. The responses will not be scored but will be used to highlight which parts of the questionnaire are applicable to your company and should therefore be answered. Key Definitions Asset Management & Custody Activities: the management of investment portfolios for institutional, retail, and high net-worth investors. The industry also covers the provision of wealth management, private banking, financial planning, and investment advisory services. Wealth managers with a small or no asset management business should also tick this option. Commercial Banks (corporate): Commercial banks (corporate) accept deposits and make loans to corporations as well as lending for projects, infrastructure, real estate, and trade finance. Companies active in corporate financing may conduct this through wholesale, commercial or investment banking segments. Commercial Banks (consumer): Also
known as retail banking, commercial consumer banks accept deposits and provide loans and mortgages to consumers. Project Finance: Projects that fall within the scope of the Equator Principles: 1. Project Finance Advisory Services where total Project capital costs are US$10 million or more. 2. Project Finance with total Project capital costs of US$10 million or more. 3. Project-Related Corporate Loans where all of the following three criteria are met: - The majority of the loan is related to a Project over which the client has Effective Operational Control (either direct or indirect). - The total aggregate loan amount and the EPFI’s individual commitment (before syndication or sell-down) are each at least US$50 million. - The loan tenor is at least two years. 4. Bridge Loans with a tenor of fewer than two years that are intended to be refinanced by Project Finance or a Project-Related Corporate Loan that is anticipated to meet the relevant criteria described in 2 and 3 above. 5. Project-Related Refinance and Project-Related Acquisition Finance, where all of the following three criteria are met: - The underlying Project was financed in accordance with the Equator Principles framework. - There has been no material change in the scale or scope of the Project. - Project Completion has not yet occurred at the time of the signing of the facility or loan agreement. Investment Banking & Brokerage: The Investment Banking and Brokerage industry includes a wide range of activities including advising companies on capital-raising in equity and debt markets, mergers & acquisitions and restructuring. Investment banks may also originate loans for projects and infrastructure. The investment banking activities most relevant for the CSA are fixed income underwriting, securitization, and loan origination. Stock Exchange: A stock exchange is a centralized facility where securities of publicly listed companies are traded. Assets traded on stock exchanges usually include stocks, bonds and exchange-traded products (ETPs). Financial Data Providers: Providers of financial decision support tools and products including rating agencies (Source: GICS) Investment Holdings: A company with significantly diversified holdings across three or more sectors, none of which contribute a majority of profit and/or sales. The main purpose is to own shares and assets in other companies rather than producing its own goods or services. Stakes held are predominantly of a non-controlling nature. Includes diversified financial companies where stakes held are of a controlling nature. (Source: GICS) Non-Life Insurance: Also referred to as property and casualty insurance. It provides protection against unforeseeable contingencies like damage and loss of the asset. Non-life insurance often includes property insurance (automobiles, household, etc.), liability insurance, travel insurance, credit insurance, etc. Data Requirements Please use the below guide to determine which questions your company should answer based on your sector activities. All other questions/other parts of questions should be marked “Not applicable”. Asset Management & Custody Activities Sustainable Investing Policy Sustainable Stewardship Sustainable Investing Products & Services Commercial Banking (Corporate) Sustainable Financing Policy (part 1) Sustainable Financing Products & Services (parts 1 & 3) Commercial Banking (Consumer) Sustainable Financing Policy (part 2) Sustainable Financing Products & Services (parts 2 & 3) Project Finance Sustainable Project Finance Policy Investing Banking & Brokerage Sustainable Financing Policy (part 1) Sustainable Financing Products & Services (part 1) Sustainable Advisory Policy Sustainable Advisory Products & Services Insurance (non-life/non-health) Sustainable Insurance Underwriting Policy Sustainable Insurance Underwriting Products & Services ASSET OWNERS: Sustainable Investing Policy Sustainable Stewardship Investment Holdings / Multi-sector Holdings Sustainable Investing Policy Sustainable Stewardship Stock Exchanges Integration of ESG Criteria in Stock Exchanges ESG Products & Services for Stock Exchanges/Index Providers Index Licensing ESG Products & Services for Stock Exchanges/Index Providers Financial Data & Analytics ESG Products & Services for Data Providers If none of the pre-defined activities matches your business model, please mark “We do not operate in any of the above activities”, provide an explanation of your business model in the comment box and do answer the questions within the sections “Sustainable Finance” and “Decarbonization” that are applicable to you based on the nature of your business model. For example, companies active in debt purchasing & credit management would not be expected to answer any “Sustainable Finance” questions, but would still answer the questions “Net-Zero Targets for Financed Emissions”, “Scope 3 Financed Absolute Emissions” and “Scope 3 Financed Emission Intensity” within “Decarbonization Strategy”. Disclosure Requirements - The document(s) you attached will be used to verify your response. - The supporting documents do not need to be available in the public domain. - If a question text field is available, a comprehensive answer in that field can be accepted instead of a supporting document. - Any response that cannot be verified in the attached document(s) or via the information provided in the related question text field (if available) will not be accepted.

1.9.2 Sustainable Investing Policy

This question requires publicly available information.

Do you have a publicly available policy outlining your approach to sustainable investment?
Yes, we have a public policy outlining how we approach sustainable investment.

**Coverage**

<table>
<thead>
<tr>
<th>Coverage</th>
<th>Yes</th>
<th>No</th>
<th>Not applicable</th>
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</table>

Our policy includes the following elements:
- Guidelines on how E, S, and G factors are incorporated into the investment process
- Definition of environmental factors considered
- Definition of social factors considered
- Definition of governance factors considered
- Exclusions
- Asset class specific guidelines
- Sector specific guidelines
- Outcome identification and measurement

No, we do not have a publicly available policy.

Not applicable. We are not active in asset management or custody activities.

**Info Text:**

Question Rationale The purpose of this question is to assess how financial institutions are integrating sustainability into their investing activities. Moving towards a sustainable economy means that all business segments of financial institutions should consider sustainability aspects. This question asks for the sustainable investment policies of companies active in asset management & custody activities. Sustainable investment policies should apply to all assets under management, including those which are externally managed and should demonstrate exactly how financial institutions are integrating sustainability into their investing activities by defining the sustainability issues which are considered. Key Definitions Active Investments: This refers to investments (e.g., mutual funds, exchange-traded funds) where a portfolio manager actively selects financial instruments to invest in. Passive Investments: This refers to investments that track an index or benchmark. Passive investments can be sustainable through the exclusion of certain companies or through the construction of ESG index variants that still track the underlying index. Externally managed assets: this refers to assets owned by the company or client’s assets of which the company is custodian which are managed by third-party asset managers. Asset managers owned by insurers who manage the insurers’ own assets, even if they are independent, should not be considered external. Guidelines on environmental/social/governance factors: Guidelines should detail how ESG factors are integrated into the investment process, for example, a proprietary or third-party rating or scoring system, and the integration of ESG risks and opportunities into due diligence processes. Definition of environmental/social/governance factors considered: this should at a minimum name the various environmental, social, and governance factors that...
are considered as part of the sustainable investing process, e.g., climate change, biodiversity, human rights, labor rights, modern slavery, board performance, board quality and performance, governance diversity. Exclusions: Exclusions can include both norms-based and negative/exclusionary screening. Norms-Based Exclusions: Norms-based screening refers to the screening of investments against minimum standards of business practice based on international norms. Norms-based screening involves either: defining the investment universe based on investees’ performance on international norms related to RI/ESG issues, or excluding investees from portfolios after investment if they are found following research, and sometimes engagement, to contravene these norms. Such norms include but are not limited to the UN Global Compact Principles, the Universal Declaration of Human Rights, International Labour Organization standards, the United Nations Convention Against Corruption, and the OECD Guidelines for Multinational Enterprises. Source: Principles for Responsible Investment Negative/Exclusionary Screening: Negative screening refers to the exclusion from a fund or portfolio of certain sectors, product involvement, or practices based on specific ESG criteria. Source: Principles for Responsible Investment Asset class/sector specific guidelines: Asset class or sector-specific guidelines are additional guidelines within sustainable investing guidelines explaining the specific approach to be taken when integrating sustainability into investments in different asset classes or sectors. Please note that sector-based exclusion policies are not considered sector-specific guidelines – the guidelines should instead explain the particular factors taken into account when integrating sustainability into investments in that sector. Outcome identification & measurement: Outcomes can be identified by looking at the performance of investments in terms of their positive contributions to sustainability challenges such as climate change, biodiversity loss, human rights, equity and inclusion, anti-corruption, etc... Outcome measurement is the assessment of this performance through key performance indicators (KPIs) or metrics. Policies including outcome identification and measurement should explain the sustainability outcomes targeted through sustainable investments and include the KPIs or metrics used to assess the performance of investments on these outcomes. Data Requirements - Please only answer this question if your company is active in investing: asset management & custody activities, private equity and derives at least 5% of revenues from these segments. If your company is not active in investing activities, please mark not applicable. - Asset owners should also answer this question. - Insurers and asset owners: if you are both an asset owner and an asset manager, you should answer this question from the asset owner’s perspective. - Percentage coverage – companies are not expected to have the exact percentage of AUM covered by their policies publicly available. A qualitative indication, e.g., that the policy covers all AUM, or that it covers all AUM with exceptions, will be accepted as evidence. - This question asks for the policies that underpin and systematize your sustainable investing activities. Scattered information and anecdotal evidence will not be accepted. Disclosure Requirements - This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications, separate fuel efficiency strategy document) or corporate website. - Any response that cannot be verified in the attached public document(s) will not be accepted.

1.9.3 Sustainable Stewardship

This question requires publicly available information.

Do you have publicly available policies on engagement and voting? Please indicate the coverage of and elements included in your policies.

- Yes, we have publicly available policies on engagement and voting

Part 1 Engagement

- Yes, we have a publicly available policy outlining your approach for engaging with investee companies?

Coverage

<table>
<thead>
<tr>
<th>Active investments</th>
<th>% AUM covered</th>
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<tr>
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<tr>
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<td>50-75%</td>
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<tr>
<td>Not applicable</td>
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Created by S&P Global, on 06 May 2024 15:25
Our engagement policy includes the following elements:

- Stewardship objectives
- Engagement guidelines for climate change
- Engagement guidelines for biodiversity
- Engagement guidelines for governance issues
- Engagement guidelines for social issues
- Prioritisation approach for engagement targets and engagement topics
- Position on collaboration on stewardship
- Escalation strategy if engagement is unsuccessful

Do you publicly report on engagement outcomes? Please provide one example of engagement you undertook in the last fiscal year

- Yes, we publicly report on engagement outcomes
  - Topic/objective
    - Managing ESG risks/Opportunities
    - Delivering sustainable outcomes
    - Both
  - Individual or Collaborative
    - Individual
    - Collaborative
  - Outcome
    - Company changed practice
    - Company committed to change
    - Disclosure or report published
    - Divestment
    - Failed/no outcome
    - Increased understanding
    - Invested in company
    - On-going
    - Vote
    - Other

- No, we do not have a public engagement policy.
- Not applicable. Please provide an explanation in the comment box.
### Active investments
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<th>Yes</th>
<th>No</th>
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<th>% AUM covered</th>
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<td>&lt;25%</td>
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### Passive investments
<table>
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<th>No</th>
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<td></td>
<td>&lt;25%</td>
</tr>
</tbody>
</table>

Our voting policy includes the following elements:
- Definition of criteria for ESG resolutions
- Decision-making process for supporting shareholder resolutions
- Voting guidelines on environmental factors
- Voting guidelines on social factors
- Voting guidelines on governance factors
- Requirements that external service provider voting recommendations are consistent with internal voting guidelines

Do you publicly disclose the percentage of ESG resolutions supported in the last fiscal year? Please indicate the percentage below

- Yes, we publicly disclose the percentage of ESG resolutions supported
- No we do not have a publicly available voting policy.
- Not applicable. Please provide an explanation in the comment box.

- No, we do not have publicly available policies on engagement and voting.
- Not Applicable. We are not active in asset management.

**Info Text:**

Question Rationale The purpose of this question is to assess the policies and behavior of companies regarding their stewardship practices in engagement and voting. While there is debate over the preference for stewardship versus divestment as the principal tool for responsible investors, it is nonetheless a crucial part of the financial sector’s role in supporting the transition to a more sustainable economy. In this question, we are asking for the details of engagement and proxy voting policies, as well as for some qualitative and quantitative indications of the outcomes of stewardship activities. Key Definitions

- **Stewardship:** Also known as active ownership, stewardship is an approach used as part of sustainable investing in which investors seek to influence the practices, policies, or actions of the investee company through engagement and voting.
- **Engagement:** One of the main tools of stewardship, engagement is characterized as interactions or dialogue between investors and current or potential investees. Purposes of engagement include (but are not limited to) discussing sustainability risks and opportunities, laying out investor expectations, changing the company’s behavior or practice, improving public disclosure, and changing sustainability outcomes.
- **Voting:** The other main tool of stewardship, voting is the exercise of voting rights bestowed upon shareholders. It includes both the voting on management or shareholder resolutions, as well as the submission of shareholder resolutions at annual general meetings (AGM).

Stewardship objectives: This should explain the rationale under which you engage with companies. Examples would be for better management of ESG risks and opportunities or enhancement of long-term returns. Engagement/voting guidelines: Guidelines on engagement and/or voting. Since each topic can be complex and should be treated separately, the best practice is for companies to have separate...
guidelines laying out the specific items that will trigger or end an engagement, or that will lead to a for or against vote. Escalation strategy: An escalation strategy outlines the steps that will be taken following an unsuccessful engagement or vote where the desired outcomes have not been achieved. It may include filing a shareholder resolution, voting against the chair, voting against the annual report, voting against the election/re-election of directors, or ultimately divesting. Prioritization approach: The prioritization approach outlines how a financial institution decides which companies to engage with and on what topics. Collaborative engagement: Collaborative engagement is investors collectively engaging in dialogue with companies to achieve an agreed outcome. It can increase the efficiency and efficacy of engagements and can be undertaken on a case-by-case basis, as part of an alliance such as Climate Action 100+ (CA100+), or coordinated by a third-party such as the PRI. A position on collaboration on stewardship outlines the circumstances under which your company decides to undertake collaborative or individual engagement. Shareholder resolutions: Shareholder resolutions can be submitted by any shareholder of a company to be put to a vote at its AGM. Shareholder resolutions are not necessarily ESG resolutions, as they can be on any topic. The submission of a shareholder resolution can often trigger a dialogue with the investee company which can lead to a compromise outcome without the resolution passing or even being put to a vote in the end. The successful passing of a shareholder resolution is not the only measure of its success overall. Sustainability-focused resolutions: Sustainability-focused resolutions are those resolutions submitted which seek to achieve a positive reporting or behavior change relating to the environmental, social, and governance practices of the investee company. Examples are the “say on climate” and “say on pay” resolutions. Investors may have their own criteria for determining a sustainability-focused resolution depending on their priorities, or they may use the definitions of third parties and alliances such as the PRI or CA100+. Voting recommendations from external service providers: Companies may hire external service providers (such as proxy voting providers or proxy advisers) to provide research and recommendations on voting at AGMs which can be valuable for investors to make informed decisions. Companies should nonetheless explain the measures they take to ensure that such voting recommendations are consistent with their own internal voting guidelines. Data Requirements Please only answer this question if your company is active in the asset management & custody activities business or derives at least 5% of revenues from this segment. For private equity companies, part 2 may be marked “Not applicable”. Asset owners should also answer this question. Insurers and asset owners: if you are both an asset owner and an asset manager, you should answer this question from the asset owner’s perspective. Asset owners may mark the coverage for passive investing as not applicable. Percentage coverage: companies are not expected to have the exact percentage of AUM covered by their policies publicly available. A qualitative indication, e.g., that the policy covers all AUM, or that it covers all AUM with exceptions, will be accepted as evidence. This question asks for the policies that underpin and systematize your sustainable stewardship activities. Scattered and anecdotal evidence will not be accepted. The exception is for the reporting on engagement outcomes – please note that companies are assessed on the availability of information and not on the outcomes achieved. Reporting on engagement outcomes: qualitative reporting on engagement outcomes such as case studies will be accepted as long as they include the targeted company, the reason for engagement, a description of how the engagement was undertaken, and the outcome. Disclosure Requirements - This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications, separate fuel efficiency strategy document) or corporate website. - Any response that cannot be verified in the attached public document(s) will not be accepted. References Climate Action 100 As You Sow

1.9.4 Sustainable Financing Policy

This question requires publicly available information.

Does the company have a policy outlining how it integrates sustainability into its financing activities and is it available publicly?

Ο Yes, the company has a policy on sustainable financing.

Part 1: Corporate Finance

Does the company's publicly available sustainable financing policy cover its corporate finance activities?

Please indicate where this information is available in public reporting or corporate website.

Ο Yes, the company's publicly available sustainable financing policy covers its corporate finance activities and includes the following elements:
Guidelines on how E, S, and G factors are incorporated in the credit/lending business for corporate clients

Definition of environmental factors considered

Definition of social factors considered

Definition of governance factors considered

Integration of ESG factors in CDD or KYC

Engagement with clients on sustainability-linked risks and opportunities.

Exclusions

No, the company does not have a publicly available sustainable financing policy covering its corporate finance activities.

Not applicable. The company is not active in corporate finance.

Part 2: Consumer Finance

Does the company's publicly available sustainable financing policy cover your consumer finance activities? Please indicate where this information is available in public reporting or corporate website.

Yes, the company's publicly available sustainable financing policy covers its consumer finance activities and includes the following elements:

Guidelines on how E and S factors are incorporated in your credit/lending business for consumers/retail banking customers

Definition of environmental or social factors considered

Engagement with clients on sustainability-linked risks and opportunities

No, the company does not have a publicly available sustainable financing policy covering its consumer finance activities.

Not applicable. The company is not active in consumer finance.

No, the company does not publicly report on a policy for sustainable financing.

Not applicable. The company is not active in financing.

Info Text:

Question Rationale: The purpose of this question is to assess how financial institutions are integrating sustainability into their financing activities, for both corporate and consumer finance clients. Financial institutions need to integrate sustainability across all their activities in order to support the transition to a more sustainable economy. This question asks for the sustainable financing policies of companies active in commercial banking (corporate and consumer) and investment banking. Sustainable financing policies should specify the ESG factors which are considered and explain how sustainability is integrated into the financing process. Key Definitions: Corporate lending: credit lines or project/infrastructure financing made to corporates. Consumer finance: credit lines, loans, or mortgages offered to individuals in the retail or consumer banking segment. Guidelines on environmental/social/governance factors: Guidelines should detail how ESG factors are integrated into the financing process, for example, a proprietary or third-party rating or scoring system, the integration of ESG risks and opportunities into due diligence processes, or exclusionary approaches. Definition of environmental/social/governance factors considered: this should at a minimum name the various environmental, social, and governance factors that are considered as part of the sustainable financing process, e.g., climate change, biodiversity, human rights, labor rights, board performance, board quality and performance, governance diversity. Customer Due Diligence (CDD)/Know Your Customer (KYC): CDD (or KYC) is the process of collecting facts about a customer that enables an organization to assess the extent to which the customer exposes it to a range of risks. These risks range from money laundering to terrorist financing. Organizations need to ‘know their customers for a number of reasons, such as complying with legal requirements, fraud prevention, etc. Evidence of CDD or KYC processes alone is not sufficient in this question – there should be evidence that additional environmental and social factors are incorporated into these processes. Exclusions: Exclusions can include both norms-based and negative/exclusionary screening. Norms-Based Exclusions/Screening: Norms-based screening refers to screening clients against minimum standards of business practice based on international norms. Norms-based screening involves refusing to provide financing or financial services to clients if they are found following research, and sometimes engagement, to contravene these norms. Such norms include but are not limited to the UN Global Compact...
Principles, the Universal Declaration of Human Rights, International Labour Organization standards, the United Nations Convention Against Corruption, and the OECD Guidelines for Multinational Enterprises. Negative/Exclusionary Screening: Negative screening refers to the exclusion from a fund or portfolio of certain sectors, product involvement, or practices based on specific ESG criteria. Source: Principles for Responsible Investment

Engagement with clients: Engagement refers to interactions between the bank and current or potential clients on sustainability issues so that the bank may better understand the sustainability-linked risks and opportunities facing clients, inform the client of these risks and opportunities and help them manage them with transition plans (for corporate finance) or information about more sustainable products and lifestyles (for consumer finance). Engagement should be integrated into the financing process so that it is a consistent part of the relationship with the financing client; general publicly available articles on ESG risks and opportunities, for example, are not considered relevant evidence. Data Requirements - If your company is not active in either commercial (corporate) banking or investment banking & brokerage business or derives less than 5% of total revenues from these two businesses combined, then mark PART 1 as “Not applicable”. - If your company is not active in commercial (consumer finance) banking or derives less than 5% of revenues from this segment, please mark PART 2 as “Not applicable”. - If your company is not active in financing activities or derives less than 5% of revenues from both commercial corporate and consumer banking individually, please mark “Not applicable” for the entire question. - This question asks for the policies that underpin and systematize your sustainable financing activities. Scattered and anecdotal evidence will not be accepted. Disclosure Requirements - This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications, separate fuel efficiency strategy document) or corporate website. - Any response that cannot be verified in the attached public document(s) will not be accepted.

1.9.5 Sustainable Project Finance Policy

This question requires publicly available information.

Does your company integrate ESG aspects into its approach for financing large-scale projects?

NOTE: This question always applies if you have project finance operations, even if this segment represents less than 5% of your revenues. For definitions of project finance, please refer to the definitions section of the information text. If your company is not active in project finance, please mark **not applicable**.

☐ Yes, we integrate ESG aspects in our approach for financing large-scale projects.

Equator Principles:

Is your company a signatory of the Equator Principles? Please indicate where this is available in your public reporting.

☐ Yes. Please provide supporting evidence.

☐ No, but we align our project finance business with the Equator Principles or with another internal/external ESG framework. Please provide supporting evidence.

☐ No, we do not align our project finance business with an ESG framework.

Monitoring Compliance:

Please indicate whether your company ensures compliance with the Equator Principles (EP) or with another internal/external ESG framework. Please also indicate where this is available in your public reporting.

☐ We ensure compliance through internal experts. Please specify.

☐ We ensure compliance through independent, third-party experts. Please specify and provide the names of third-party experts.

Review:

Please indicate the number of projects/deals during the last fiscal year that have been reviewed in line with the Equator Principles or with another internal/external ESG framework. Please also indicate where this is available in your public reporting.

Number of projects/deals reviewed:

Number of projects/deals reviewed as percentage of total projects/deals:
Number of projects/deals having reached financial close:

Number of projects/deals declined:

Please specify reason:

Transparency:
Please give three detailed publicly available examples of projects/deals to which the policies were applied and which show that the company is complying with the ESG framework, and provide the website where the examples are described.

Example 1:

Example 2:

Example 3:

- No, we do not integrate ESG aspects into our approach for financing large-scale projects.
- Not applicable. We are not active in project finance.

Info Text:
Question Rationale The purpose of this question is to assess how financial institutions are integrating ESG aspects into their project finance transactions. Financial institutions are expected to have standardized procedures in financing or providing services to large projects with high potential social and environmental impacts. Moreover, as providers of capital, financial institutions are increasingly coming under scrutiny and pressure from civil society with regard to their project finance, export finance, and trading finance activities. This question asks whether companies are a signatory of the Equator Principles or align their project finance business with another ESG framework, whether their compliance is monitored, whether they disclose the deals reviewed, closed, and declined according to the principles/ESG framework, and whether they are able to disclose specific examples. Key Definitions Project Finance: The Equator Principles provide a common baseline and framework to ensure that the projects financed and advised on are developed in a manner that is socially responsible and reflects sound environmental management practices. They recognize the importance of climate change, biodiversity, and human rights, and believe negative impacts on project-affected ecosystems, communities, and the climate should be avoided where possible. Projects that fall within the scope of the Equator Principles: 1. Project Finance Advisory Services where total Project capital costs are US$10 million or more. 2. Project Finance with total Project capital costs of US$10 million or more. 3. Project-Related Corporate Loans where all of the following three criteria are met: i. The majority of the loan is related to a Project over which the client has Effective Operational Control (either direct or indirect). ii. The total aggregate loan amount and the EPFI’s individual commitment (before syndication or sell down) are each at least US$50 million. iii. The loan tenor is at least two years. 4. Bridge Loans with a tenor of fewer than two years that are intended to be refinanced by Project Finance or a Project-Related Corporate Loan that is anticipated to meet the relevant criteria described in 2 and 3 above. 5. Project-Related Refinance and Project-Related Acquisition Finance, where all of the following three criteria are met: i. The underlying Project was financed in accordance with the Equator Principles framework. ii. There has been no material change in the scale or scope of the Project. iii. Project Completion has not yet occurred at the time of the signing of the facility or loan agreement. Internal Experts, Site Inspection: Internal experts from the company/bank are providing assurance about compliance with policies/guidelines. An inspection from other creditors involved in the deal is considered as internal experts. Independent, Third-Party Monitoring: A qualified and experienced third party is mandated by the company/bank to verify compliance with the EP. The third party is a qualified and recognized expert in the field. For the scope of this question, independent third-party monitoring of compliance with policies/guidelines provided by one of the other creditors/banks involved in financing the project is also accepted. Data Requirements Transparency: three detailed publicly available examples of projects/deals are expected. Anonymized case studies are acceptable. Disclosure Requirements - This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications, separate fuel efficiency strategy...
1.9.6 Sustainable Advisory Policy

This question requires publicly available information.

Does the company have a policy on how it integrates sustainability into its investment banking advisory activities and is it available publicly?

- Yes, the company has a policy on how it integrates sustainability into its advisory activities.

  **Part 1: Underwriting Fixed Income**

  Does the company have a policy for integrating sustainability into advisory cover fixed income underwriting and is it available publicly? Please indicate where this information is available in public reporting or corporate website.

  - Yes, the company's publicly available policy covers fixed income underwriting and includes the following elements:
    - Integration of ESG factors in CDD or KYC
    - Engagement with clients on sustainability-linked risks and opportunities
    - Exclusions

  - No, the company's sustainable advisory policy does not cover fixed income underwriting.

  - Not applicable. The company is not active in underwriting fixed income.

  **Part 2: Securitization**

  Does the company have a policy or integrating sustainability into advisory cover securitization and is it available publicly? Please indicate where this information is available in public reporting or corporate website.

  - Yes, the company's publicly available policy covers securitization and includes the following elements:
    - Requirements for determining constituent green/sustainable collateral
    - Requirements for use of proceeds by originator

  - No, the company's sustainable advisory policy does not cover securitization.

  - Not applicable. The company is not active in securitization.

  - No, the company does not publicly report on a policy for sustainable advisory.

  - Not applicable. The company is not active in these investment banking advisory activities.

**Info Text:**

Question Rationale The purpose of this question is to assess how financial institutions are integrating sustainability into their advisory activities in the investment banking & brokerage segment. Financial institutions need to integrate sustainability across all their activities in order to support the transition to a more sustainable economy. This question asks for the sustainable advisory policies of companies active in investment banking & brokerage. Sustainable advisory policies may be part of wider sustainable financing or sustainable risk management policies, but they should explain how sustainability is integrated into fixed-income underwriting and securitization activities. Key Definitions: Advisory: Advisory includes a wide range of activities advising companies on capital-raising in equity and debt markets, mergers & acquisitions, and restructuring. However, for the purposes of this question, an advisory is limited to fixed-income underwriting and securitization issuance. It does not include mergers & acquisitions related services. Sustainable fixed income underwriting: Sustainable fixed income underwriting or origination includes green bonds, social bonds, sustainable bonds, and sustainability-linked bonds. Policies related to the issuance of sustainable fixed income by companies themselves are not considered in this question. Customer Due Diligence (CDD)/Know Your Customer (KYC): CDD (or KYC) is the process of collecting facts about a customer that enables an organization to assess the extent to which the customer exposes it to a range of risks. These risks range from money laundering to terrorist financing. Organizations need to ‘know their customers for a number of reasons, such as complying with legal requirements, fraud prevention, etc. Evidence of CDD and KYC
processes alone is not sufficient in this question – there should be evidence that additional environmental and social factors are incorporated into these processes. Exclusions: Exclusions include both norms-based and negative/exclusionary screening. Norms-Based Exclusions/Screening: Norms-based screening refers to screening clients against minimum standards of business practice based on international norms. Norms-based screening involves refusing to provide financing or financial services to clients if they are found following research, and sometimes engagement, to contravene these norms. Such norms include but are not limited to the UN Global Compact Principles, the Universal Declaration of Human Rights, International Labour Organization standards, the United Nations Convention Against Corruption, and the OECD Guidelines for Multinational Enterprises. Negative/Exclusionary Screening: Negative screening refers to the exclusion from a fund or portfolio of certain sectors, product involvement, or practices based on specific ESG criteria. Source: Principles for Responsible Investment Engagement with clients: Engagement refers to interactions between the bank and current or potential clients on sustainability issues so that the bank may better understand the sustainability-linked risks and opportunities facing clients, inform the client of these risks and opportunities and help them manage them with transition plans. Engagement should be integrated into the advisory process; general publicly available articles on ESG risks and opportunities, for example, are not considered relevant evidence. Sustainable securitization: Sustainable securitization can include the pooling of asset-backed debt which is sustainable, or securitization from which the proceeds are used for sustainable financing. Data Requirements - Please only answer this question if your company is active in advisory activities or derives at least 5% of revenues from this segment and offers fixed income and securitization origination services. If your company is not active in these advisory activities and does not offer fixed income and securitization origination services, please mark “Not applicable”. - This question asks for the policies that underpin and systematize your sustainable advisory activities. Scattered and anecdotal evidence will not be accepted. Disclosure Requirements - This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications, separate fuel efficiency strategy document) or corporate website. - Any response that cannot be verified in the attached public document(s) will not be accepted.

1.9.7 Sustainable Investing Products & Services

This question requires publicly available information.

Do you offer sustainable investing products and/or services? Please provide a brief description for each category and the assets under management (AUM) or assets under custody (AUC) for each category for the last fiscal year. Please indicate where this information is available in your public reporting or corporate website.

☒ Yes, we offer sustainable investing products and/or services
Your company’s reporting currency:

Part 1: Proprietary sustainable investment products
Please categorise your proprietary sustainable investment products by the investment approaches listed below, indicate whether an acceptable description is publicly available, and provide the AUM for the last fiscal year for each category.

☒ We offer proprietary sustainable investment products and/or services:

<table>
<thead>
<tr>
<th>Category</th>
<th>AUM FY 2023</th>
</tr>
</thead>
<tbody>
<tr>
<td>ESG Integration</td>
<td></td>
</tr>
<tr>
<td>│ ☐ Acceptable description available</td>
<td></td>
</tr>
<tr>
<td>Best in Class</td>
<td></td>
</tr>
<tr>
<td></td>
<td>☐ Acceptable description available</td>
</tr>
<tr>
<td>Thematic</td>
<td></td>
</tr>
<tr>
<td></td>
<td>☐ Acceptable description available</td>
</tr>
<tr>
<td>Impact investing</td>
<td></td>
</tr>
<tr>
<td></td>
<td>☐ Acceptable description available</td>
</tr>
<tr>
<td>Category</td>
<td>AUM FY 2023</td>
</tr>
<tr>
<td>--------------------------</td>
<td>-------------</td>
</tr>
<tr>
<td>Other</td>
<td></td>
</tr>
<tr>
<td>☐ Acceptable description available</td>
<td></td>
</tr>
<tr>
<td>Total (AUM)</td>
<td></td>
</tr>
<tr>
<td>Total sustainable (AUM)</td>
<td></td>
</tr>
<tr>
<td>Percentage of sustainable AUM over Total AUM</td>
<td></td>
</tr>
</tbody>
</table>

- ☐ No, we do not have any proprietary sustainable investment products, or we do not publicly report on their AUM in the last fiscal year.
- ☐ Not applicable. We do not offer any proprietary investment products. Please provide an explanation in the comment box.

**Part 2: Third-party sustainable investment products**

Please categorise your third-party sustainable investment products by the investment approaches listed below, indicate whether an acceptable description is publicly available, and provide the AUC for the last fiscal year for each category.

- ☐ We offer third-party sustainable investment products to our clients:

<table>
<thead>
<tr>
<th>Category</th>
<th>AUC FY 2023</th>
</tr>
</thead>
<tbody>
<tr>
<td>ESG Integration</td>
<td></td>
</tr>
<tr>
<td>☐ Acceptable description available</td>
<td></td>
</tr>
<tr>
<td>Best in Class</td>
<td></td>
</tr>
<tr>
<td>☐ Acceptable description available</td>
<td></td>
</tr>
<tr>
<td>Thematic</td>
<td></td>
</tr>
<tr>
<td>☐ Acceptable description available</td>
<td></td>
</tr>
<tr>
<td>Impact investing</td>
<td></td>
</tr>
<tr>
<td>☐ Acceptable description available</td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td></td>
</tr>
<tr>
<td>☐ Acceptable description available</td>
<td></td>
</tr>
<tr>
<td>Total AUC</td>
<td></td>
</tr>
<tr>
<td>Total sustainable AUC</td>
<td></td>
</tr>
<tr>
<td>Percentage of sustainable AUC over total AUC</td>
<td></td>
</tr>
</tbody>
</table>

- ☐ No, we do not offer any third-party sustainable investment products to our client, or we do not publicly report on their AUC in the last fiscal year.
- ☐ Not applicable. Please provide an explanation in the comment box.
- ☐ No, we do not offer sustainable investment products, or do we not publicly report on their AUM/AUC in the last fiscal year.
- ☐ Not applicable. Our company is not active in asset management & custody activities.

**Info Text:**

Question Rationale: Financial institutions active in asset management & custody activities have an important role to play in addressing sustainability challenges by facilitating the transition to a low-carbon economy and stimulating sustainable development through their investment activities. Offering sustainable investment products & services utilizing a variety of sustainable investment approaches is an important aspect of financial institutions’ contribution to sustainable development, and also helps mitigate risks associated with unsustainable investments such as stranded assets. With this question, we are looking at the range and value of sustainable investment products and services offered by financial institutions in the asset management and custody activities business segment. Key Definitions: ESG integration: the systematic inclusion of ESG factors into investment analysis and decisions to create an ESG or sustainability-labeled product. ESG integration as an approach applied to the entire portfolio is not the scope of this question as it...
is already covered in the Sustainable Investing Policy question. Best-in-Class screening: Investing in sectors, companies, or projects selected for their positive ESG performance relative to industry peers. Also known as positive screening. (PRI) Thematic investing: The identification and allocation of capital to themes or assets related to certain environmental or social outcomes, such as clean energy, energy efficiency, or sustainable agriculture. (PRI) Impact investing: investments made with the intention to generate positive, measurable social and environmental impact alongside a financial return. Impact investments can be made in both emerging and developed markets, and target a range of returns from below market to market rate, depending on investors' strategic goals. (GIIN) Proprietary sustainable investment products: sustainable investment products developed and managed by your own company. Third-party sustainable investment products: sustainable investment products managed by outside managers which you offer to clients as part of wealth management or investing services. This does not include own assets which may be invested with third-party managers. Data Requirements - If your company is not active in investing, please mark the entire question as “Not applicable”. Asset owners should not answer this question. - If you do not offer in-house sustainable investment products, or you do not offer third-party sustainable investment products, then please mark the corresponding section as “Not applicable”. - If you offer both in-house sustainable investment products and third-party sustainable investment products to clients but you do not separate the values in this way, then please enter all information in Part 1 and mark Part 2 “Not applicable”. - Please note that products using negative screening/exclusions only will not be accepted. However, if negative screening is used in combination with another approach this is acceptable. - Other category: Only products meeting our requirements will be accepted in the “other” row, namely those categorized as articles 8 and 9 in line with EU SFDR requirements. We will also accept in this row the total value of all sustainable investments, in case you are not able to disaggregate your investments according to the categories listed. - Companies are scored on both the share of their sustainable investing products and the availability of an acceptable description of those products. A description is considered acceptable when it outlines how the product is considered sustainable, e.g., by providing examples of individual products or by disclosing the criteria to be met by the product in order to be classified as sustainable. - For impact investing: please note that the AUM/AUC value for this category will only be accepted if accompanied by an acceptable description meeting the CSA’s definition of impact investing. Disclosure Requirements - This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications, separate fuel efficiency strategy document) or corporate website. - Any response that cannot be verified in the attached public document(s) will not be accepted.

1.9.8 Sustainable Financing Products & Services

This question requires publicly available information.

Do you offer sustainable financing products and/or services? Please indicate where this information is available in your public reporting or corporate website.

☐ Yes, we offer sustainable financing products and/or services

Your company’s reporting currency:

Part 1: Corporate Finance

Please categorize your sustainable financing products for corporate clients by the categories listed below, and provide a description and the monetary value for the last fiscal year for each.

☐ We offer sustainable financing products and/or services to our corporate clients.

☐ We report loan values as the total outstanding amount instead of newly issued in the last fiscal year.

<table>
<thead>
<tr>
<th>Category</th>
<th>Monetary Value FY 2023</th>
</tr>
</thead>
<tbody>
<tr>
<td>Green loans, social loans, sustainable loans</td>
<td></td>
</tr>
<tr>
<td>☐ Acceptable description available</td>
<td></td>
</tr>
<tr>
<td>Sustainability-linked corporate loans</td>
<td></td>
</tr>
<tr>
<td>☐ Acceptable description available</td>
<td></td>
</tr>
<tr>
<td>Total value of corporate lending</td>
<td></td>
</tr>
<tr>
<td>Total sustainable value</td>
<td></td>
</tr>
<tr>
<td>Category</td>
<td>Monetary Value FY 2023</td>
</tr>
<tr>
<td>----------</td>
<td>-----------------------</td>
</tr>
<tr>
<td>Percentage of total sustainable value over total value</td>
<td></td>
</tr>
</tbody>
</table>

- No, we do not offer any sustainable financing to our corporate clients, or we do not publicly report on the monetary value in the last fiscal year.
- Not applicable. We are not active in corporate finance.

**Part 2: Consumer Finance**

Please provide a description of your sustainable finance products and mortgages for consumers and the monetary value in the last fiscal year.

- We offer sustainable financing products and/or services to consumers.
- We report loan values as the total outstanding amount instead of newly issued in the last fiscal year.

<table>
<thead>
<tr>
<th>Category</th>
<th>Monetary Value FY 2023</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sustainable loans and mortgages</td>
<td></td>
</tr>
<tr>
<td>Total value of personal and mortgage lending</td>
<td></td>
</tr>
<tr>
<td>Percentage of total sustainable value over total value</td>
<td></td>
</tr>
</tbody>
</table>

- No, we do not offer any sustainable financing to consumers/individuals, or we do not publicly report on the monetary value in the last fiscal year.
- Not applicable. We are not active in consumer finance.

**Part 3: SME Lending**

Please provide a description of your sustainable finance products and mortgages for small and medium-sized enterprises (SMEs) and the monetary value in the last fiscal year.

- Yes, we offer sustainable financing products and/or services to small and medium-sized enterprises.
- We report loan values as the total outstanding amount instead of newly issued in the last fiscal year.

<table>
<thead>
<tr>
<th>Category</th>
<th>Monetary Value FY 2023</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sustainable SME loans</td>
<td></td>
</tr>
<tr>
<td>Total value of SME lending</td>
<td></td>
</tr>
<tr>
<td>Percentage of total sustainable value over total value</td>
<td></td>
</tr>
</tbody>
</table>

- No, we do not offer any sustainable financing to small and medium-sized enterprises, or we do not publicly report on the monetary value in the last fiscal year.
- Not applicable. We do not offer sustainable finance products and mortgages for small and medium-sized enterprises (SMEs).
- No, we do not offer any sustainable financing products, or we do not publicly report on the monetary value in the last fiscal year.
- Not applicable. We are not active in financing activities.

**Info Text:**

Financial institutions active in commercial and investment banking have an important role to play in addressing sustainability challenges by facilitating the transition to a low-carbon economy and stimulating sustainable development through their financing activities. Offering a variety of sustainable financing products & services to corporates, consumers and SMEs is an important aspect of financial institutions’ contribution to sustainable development, and also helps mitigate risks associated with unsustainable financing such as stranded assets. With this question, we are looking at the range and value of sustainable financing products and services offered by financial institutions for their corporate, consumer, and SME clients. Key Definitions Green and social corporate loans: Green and social loans are any type of loan...
instrument made available exclusively to finance or re-finance, in whole or in part, new and/or existing eligible green or social projects, i.e., projects which contribute to the achievement of green or social outcomes such as those listed in the Green and Social Loan Principles or those that are aligned with the EU Taxonomy, excluding those mentioned in the Complementary Climate Delegated Act (Delegated Regulation (EU) 2022/1214). (Source: LMA, LTSA and APLMA Green Loan Principles and the LMA, LTSA and APLMA Social Loan Principles; EU Taxonomy Compass (europa.eu)) Note that activities that are EU Sustainable Taxonomy eligible, are not acceptable. Sustainable corporate loans: Sustainable corporate loans are any type of loan instrument made available exclusively to finance or re-finance, in whole or in part, new or existing projects which may combine green and social benefits, or which contribute to established sustainable development outcomes, such as the Sustainable Development Goals (SDGs) or those that are aligned with the EU Taxonomy, excluding those mentioned in the Complementary Climate Delegated Act (Delegated Regulation (EU) 2022/1214). Note that activities that are EU Sustainable Taxonomy eligible, are not acceptable. Sustainability-linked corporate loans: Sustainability-linked loans are any type of loan instruments and/or contingent facilities (such as bonding lines, guarantee lines, or letters of credit) that incentivize the borrower’s achievement of ambitious, predetermined sustainability performance objectives. The borrower’s sustainability performance is measured using predefined sustainability performance targets (SPTs), as measured by predefined key performance indicators (KPIs), which may comprise or include external ratings and/or equivalent metrics, and which measure improvements in the borrower’s sustainability profile. (Source: LMA, LTSA, APLMA Sustainability-Linked Loan Principles) Green, social, sustainable, and sustainability-linked trade finance and supply chain finance will also be accepted in this question. Sustainable consumer loans: Sustainable consumer loans are personal loans or lines of credit offered to retail banking customers specifically dedicated to financing more sustainable activities, such as the purchase of an electric vehicle, the energy efficient renovation of a home, or the installation of solar panels. Credit cards are not considered relevant to this question. Loans with financial inclusion as an objective are also not within the scope of this question. Sustainable mortgages: A sustainable mortgage is a mortgage offered with environmental conditions attached (such as minimum environmental requirements of the home purchased, or financial incentives to purchase more efficient homes). Sustainable mortgages may also be offered to support affordable housing solutions. Small and medium-sized enterprises (SMEs): Definitions of SMEs vary from country to country and between sectors. The International Finance Corporation defines SMEs as businesses with between 10 and 300 employees, or between USD 100,000 and USD 15 million in assets. (Source – IFC) Sustainable SME lending: credit lines or commercial mortgages offered to small or medium-sized enterprises. SME financing alone is not considered “sustainable” – in order to meet the requirements of this question for sustainable SME financing, the financing must include additional sustainable elements beyond just providing capital to SMEs, for example, loans to improve the energy efficiency of business premises. Data Requirements - If your company is not active in corporate financing, please mark PART 1 as “Not applicable”. - If your company is not active in consumer financing or derives less than 5% of revenues from this segment, please mark PART 2 as “Not applicable”. - If your company is not active in SME lending or derives less than 5% of revenues from this segment, please mark PART 3 as “Not applicable”. - If you offer sustainable SME lending but do not publicly disaggregate these values from your corporate or consumer financing values, please mark PART 3 as “Not applicable” and include the values in parts 1 or 2 as applicable, making sure that the total monetary value also includes all SME lending. This approach will only be accepted with public qualitative evidence that sustainable SME lending is included in corporate or consumer lending figures. - In Part 1, if you cannot disaggregate your products into the categories provided, please enter a description and value in the first row only. - Consumer Finance: Products aimed at improving financial inclusion (such as providing financial products to unbankable or vulnerable populations) are not within the scope of this question and should instead be provided in the question “Financial Inclusion Products & Services”. - SME lending: Products aimed at micro businesses (generally considered as businesses with fewer than 10 employees) are not within the scope of this question and should instead be provided in the question “Financial Inclusion Products & Services”. - Description and value: Companies are scored on both the share of their sustainable financing products and the availability of a description of those products. A description is considered acceptable when it outlines how the product is considered sustainable, e.g., by providing examples of individual products or by disclosing the criteria to be met by the product in order to be classified as sustainable. The value should be loans issued in the last fiscal year, not the outstanding loan amount. If you only report loans values as the total outstanding amount rather than the value of loans issued in the last fiscal year, please tick the box above the table in each part. Please note that the value of sustainable loans and the total value of loans in that segment must always be reported in the same format. - Sustainable financing frameworks outlining the criteria that need to be met for a financing transaction to be considered sustainable can be acceptable evidence for the descriptions. Disclosure Requirements - This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications, separate fuel efficiency strategy document) or corporate website. - Any response that cannot be verified in the
attached public document(s) will not be accepted. References Green Loan Principles; Use of Proceeds Social Loan Principles; Use of Proceeds Guidance on Sustainability-Linked Loan Principles

1.9.9 Sustainable Advisory Products & Services

Additional credit may be granted for publicly available evidence.

Do you offer sustainable fixed income underwriting or securitization issuance products and/or services? Please provide a brief description for each category and the monetary value for the last fiscal year.

Yes, we offer sustainable fixed income underwriting or securitization issuance products and/or services in our investment banking segment.

Your company’s reporting currency:

<table>
<thead>
<tr>
<th>Monetary Value FY 2023</th>
<th>% of products verified/assured/certified</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fixed income underwriting – green, social, sustainable bonds</td>
<td>❑ 75-100%</td>
</tr>
<tr>
<td>❑ Public reporting available</td>
<td>❑ 50-75%</td>
</tr>
<tr>
<td>❑ Acceptable description available</td>
<td>❑ 25-50%</td>
</tr>
<tr>
<td></td>
<td>❑ 0-25%</td>
</tr>
<tr>
<td></td>
<td>❑ 0%</td>
</tr>
<tr>
<td></td>
<td>❑ Not known</td>
</tr>
<tr>
<td>Fixed income underwriting – sustainability-linked bonds</td>
<td>❑ 75-100%</td>
</tr>
<tr>
<td>❑ Public reporting available</td>
<td>❑ 50-75%</td>
</tr>
<tr>
<td>❑ Acceptable description available</td>
<td>❑ 25-50%</td>
</tr>
<tr>
<td></td>
<td>❑ 0-25%</td>
</tr>
<tr>
<td></td>
<td>❑ 0%</td>
</tr>
<tr>
<td></td>
<td>❑ Not known</td>
</tr>
<tr>
<td>Sustainable securitization</td>
<td>❑ 75-100%</td>
</tr>
<tr>
<td>❑ Public reporting available</td>
<td>❑ 50-75%</td>
</tr>
<tr>
<td>❑ Acceptable description available</td>
<td>❑ 25-50%</td>
</tr>
<tr>
<td></td>
<td>❑ 0-25%</td>
</tr>
<tr>
<td></td>
<td>❑ 0%</td>
</tr>
<tr>
<td></td>
<td>❑ Not known</td>
</tr>
<tr>
<td>Total monetary value of all fixed income underwritten and securitization issued</td>
<td>❑ 75-100%</td>
</tr>
<tr>
<td>❑ Total sustainable monetary value</td>
<td>❑ 50-75%</td>
</tr>
<tr>
<td>❑ Percentage sustainable monetary value over total monetary value</td>
<td>❑ 25-50%</td>
</tr>
</tbody>
</table>

No, we do not offer any sustainable fixed income origination or securitization issuance products and/or services.

Not applicable. We do not provide these investment banking advisory services.
Question Rationale: Financial institutions active in investment banking have an important role to play in addressing sustainability challenges by facilitating the transition to a low-carbon economy and stimulating sustainable development through their advisory activities. Offering a variety of sustainable advisory products & services is an important aspect of financial institutions' contribution to sustainable development, and also helps mitigate risks associated with unsustainable advisory. With this question, we are looking at the range and value of sustainable advisory products and services offered by financial institutions. Key Definitions:

Advisory: Advisory in investment banking includes a wide range of activities advising companies on capital-raising in equity and debt markets, mergers & acquisitions, and restructuring. However, for the purposes of this question, advisory is limited to fixed-income underwriting and securitization issuance. It does not include mergers & acquisitions related services. Green, social, sustainability fixed income underwriting:

Green/social/sustainability bonds are any type of bond instrument where the proceeds or an equivalent amount will be exclusively applied to finance or re-finance, in part or in full, new and/or existing eligible green/social/sustainable projects (Source: ICMA Green Bond Principles, Social Bond Principles, Sustainability Bond Principles) Sustainability-linked fixed income underwriting: Sustainability-linked bonds (SLBs) are any type of bond instrument for which the financial and/or structural characteristics can vary depending on whether the issuer achieves predefined Sustainability/ESG objectives. In that sense, issuers are thereby committing explicitly (including in the bond documentation) to future improvements in sustainability outcome(s) within a predefined timeline. SLBs are a forward-looking performance-based instrument. Those objectives are (i) measured through predefined Key Performance Indicators (KPIs) and (ii) assessed against predefined Sustainability Performance Targets (SPTs). The proceeds of SLBs are intended to be used for general purposes, hence the use of proceeds is not a determinant in its categorization. (Source: ICMA) Verification/assurance/certification: Verification, assurance, or certification of fixed income or securitization products refers to an external review of those instruments assessing whether they meet the requirements of the sustainability label assigned to them or whether they align with the requirements of the green/social/sustainability/sustainability-linked bond principles or the Climate Bonds Standard. Sustainable Securitization: Sustainable securitization products are securitized products where either the underlying assets are considered sustainable (for example green mortgages or energy efficiency loans) or where the proceeds from the securitization transaction will be used to finance or re-finance assets or projects with a positive impact.

Data Requirements:
- Please only answer this question if your company is active in the Investment Banking & Brokerage business segment or derives at least 5% of revenues from this segment and offers fixed income and securitization origination services. If your company is not active in these advisory activities and does not offer fixed income and securitization origination services, please mark “Not applicable”.
- If you are unable to disaggregate your products according to the categories listed, please enter the description and value for the row “Fixed income underwriting – green, social, sustainable bonds”. - Description and value: Companies are scored on both the share of their sustainable advisory products and the availability of a description of those products. A description is considered acceptable when it outlines how the product is considered sustainable, e.g., by providing examples of individual products or by disclosing the criteria to be met by the product in order to be classified as sustainable. - The monetary value required is the value of bonds underwritten or securitized products issued in the last fiscal year. Disclosure requirements for partially public questions: Additional credit will be granted for public disclosure covering the following aspects in each product/service category:
  - Monetary value of the category in the last fiscal year

References:
European Banking Authority, Developing a Framework for Sustainable Securitization (2022)
bottom line (e.g. legal liabilities or high probability of imminent legal liabilities). In addition, the overall quality of the management response to a situation is assessed, evaluating whether a company has transparently and proactively managed the issue.

2 Environmental Dimension

2.1 Energy

In the last century, there has been an unprecedented increase in the use of natural resources and materials. Producing more with less material is essential for many industries affected by the increasing scarcity of natural resources. Resource efficiency and circularity can enhance companies’ competitiveness through reduced costs and environmental liabilities. It can also mean companies are better prepared for future environmental regulations. The key focus of this criterion is to identify trends across the company’s energy consumption, efficiency and circularity across business operations.

2.1.1 Energy Consumption

Additional credit may be granted for publicly available evidence.

Please complete the following table about total energy consumption. For each row in the table, it is mandatory that the values provided are in the same unit. Please see the Information Button for definitions of the cost options. Also, please ensure that you have correctly filled in the Company Information section at the beginning of the questionnaire, and that the coverage in the table below is related to the denominator relevant for your company as indicated in that section.

<table>
<thead>
<tr>
<th>Total energy consumption</th>
<th>Unit</th>
<th>FY 2020</th>
<th>FY 2021</th>
<th>FY 2022</th>
<th>FY 2023</th>
<th>What was your target for FY 2023?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total non-renewable energy consumption</td>
<td>MWh</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total renewable energy consumption</td>
<td>MWh</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Data coverage (as % of denominator)</td>
<td>percentage of:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

PUBLIC REPORTING

☒ Our data is publicly available. Please provide supporting evidence or web link.

THIRD-PARTY VERIFICATION

☒ Our data has been third-party verified in the most recent financial year reported. Please provide supporting evidence.

DATA CONSISTENCY

☒ We report publicly on this information, but the data in the table above differs from our publicly reported figures. Please provide an explanation in the comment box for this difference:
We have a temporary coverage reduction or target challenge due to corporate actions. Please briefly explain if a merger, acquisition, divestment, etc. has temporarily caused a reduction in your ability to report optimal coverage or caused your target to appear abnormal:

We are not able to report this information in absolute terms, the information provided in the table above is normalized data. For the purpose of this question, please always provide absolute figures if available.

- No, we do not track energy consumption.
- Not applicable. Please provide explanations in the comment box below.
- Not known

Info Text:
Question Rationale In the last century, there has been an unprecedented increase in the use of natural resources and materials. Producing more with less material is essential for many industries affected by the increasing scarcity of natural resources. Resource efficiency and circularity can enhance companies’ competitiveness through reduced costs and environmental liabilities. It can also mean companies are better prepared for future environmental regulations. In this question, we are capturing the total non-renewable and total renewable energy consumption, assessing the overall trend of consumption, as well as the target set for the current financial year. Key Definitions Total non-renewable energy consumption: This is the sum of non-renewable consumption of fuel (excluding feedstocks), consumption of non-renewable purchased or acquired electricity, and consumption of non-renewable purchased or acquired heat, steam and cooling. Total renewable energy consumption: This is the sum of consumption of renewable fuel (excluding feedstocks), consumption of renewable purchased or acquired electricity, consumption of renewable purchased or acquired heat, steam and cooling and consumption of self-generated non-fuel renewable energy. Renewable energy: This is energy taken from sources that are inexhaustible such as wind, solar, hydropower, geothermal, biomass and marine (tidal and wave energy), as defined in the GHG Protocol. Please note hydrogen should not be included if it is derived from fossil fuels. Similarly, waste energy should not be included if it is derived from fossil fuels. Non-Renewable energy: This is all energy not identified as deriving from renewable sources, e.g., coal, oil, natural gas, etc. Please note that blended fuels deriving from both renewable and non-renewable sources should be split by the proportion contained from each source. Nuclear energy is not considered as renewable energy and should be reported under total non-renewable energy. Please note that direct consumption of nuclear fuel should not be included. Fuels (excluding nuclear) should be covered, including fleet fuel. Consumption of purchased or acquired electricity, steam heat, and/or cooling from nuclear sources should be included. Self-generated non-fuel renewable energy: If your organization produces renewable energy that is not based on fuel (such as solar, wind, hydro, geothermal, marine), then any consumption of this energy should be entered under total renewable energy. All forms of non-fuel renewable energy, electricity, heat, steam, or cooling should be included under total renewable energy. Excluding feedstocks: Fuels consumed as feedstocks are fuels that are not combusted for energy purposes. All fuel consumed for energy purposes inside the organizational boundary should be included, regardless of whether the fuel was purchased or produced by the organization. If a fuel is consumed as a feedstock for the production of another fuel, then the feedstock should not be included, but combustion of the produced fuel should be included. Ultimately, if a fuel is consumed, i.e., consumed for energy purposes and not as a feedstock, then it should be included. For example, naphtha and ethane are feedstocks that may be converted into petrochemical products such as ethylene, and should not be included. The steel industry is a special case because coke and fuel injectants consumed at the blast furnace serve as feedstocks and a source of energy. These fuels are considered feedstocks and should not be counted. (Such as coke used as a reducing agent) However, all fuels consumed for energy, i.e., combusted, that are derived from fuel feedstocks, e.g., blast furnace gas, should be counted. This table is for gross energy consumption data only. You should not provide net consumption nor deduct for energy produced or exported from the organizational boundary. Because feedstock fuels are excluded from this question, this approach should not lead to double counting. Companies shall use the total—or gross—electricity purchases from the grid rather than grid purchases “net” of generation for the scope 2 calculation. A company’s total energy consumption would therefore include self-generated energy (any emissions reflected in scope 1) and total electricity purchased from the grid (electricity). It would exclude generation sold back to the grid. Purchased or acquired electricity, steam, heat, cooling: - This includes the consumed electricity, heat, steam, and/or cooling that was purchased or acquired, i.e., brought into the organizational boundary. This excludes the consumption of electricity, heat, steam, or cooling that was produced by the organization, i.e., from inside the organizational boundary. It also excludes purchased or acquired electricity, heat, steam, or cooling that is not consumed inside the organizational boundary. Purchased or acquired electricity, heat, steam, or cooling that is wasted should still be counted as consumption. - Purchased or acquired electricity, steam, or cooling that is not consumed should still be counted as consumption.
steam, heat, and cooling are aligned with the boundary for scope 2 emissions. The consumption of fuel (excluding feedstocks) should be entered if the fuel was consumed inside your organizational boundary in the last fiscal year and is aligned with the boundary for scope 1 emissions. Therefore, in this question, we would like to capture your energy consumption for scope 1 and scope 2. - Specific information on these energy carriers can be found in section 5.3.1 and Appendix A of the GHG Protocol Scope 2 Guidance. - The terms “purchased” and “acquired” are used when your organization has received the energy from a third party. This rules out energy that is sourced from within the organizational boundary. It should be noted that purchased or acquired heat does not include the heat content, or calorific value, of fuels that are purchased or acquired by the organization. This is accounted for at the point of fuel consumption, which falls inside the Scope 1 boundary. You should also be aware that steam, heat or cooling received via direct line as “waste” from a third party’s industrial processes, should still be accounted for if it is consumed. - If your organization produces renewable energy that is not based on fuel (such as solar, wind, hydro, geothermal, marine), this energy consumption should be included in total renewable energy consumption. Consumption of renewable fuels (such as solid and liquid biofuels and biogas) also should be included. All forms of non-fuel renewable energy - electricity, heat, steam, or cooling – shall be included under non-renewable energy. Leased Assets: Guidance for how to handle leased assets and spaces can be found on page 36 of the GHG Scope 2 Protocol, (5.2.1). Renewable Energy Credits: These should fall under MWh from renewable sources. RECs, RECs from Power Purchase Agreements, energy attribute certificates, contractual instruments, TIGRs, and unbundled certificates should be reflected under MWh from renewable sources. Units and conversion: - The most common unit for electricity is Watt-hours. 1 MWh is equal to 1,000,000 Watt-hours, which is equal to 1,000 kWh (kilo-Watt-hours). - If your raw data is in energy units other than MWh, such as Giga-Joules (GJ) or British Thermal Units (Btu), then you should convert to MWh. For example, 1 Giga-Joule (GJ) = 0.2777778 MWh, so if your data is in GJ then you should multiply your data by 0.2777778. If your data is in million Btu, then you need to multiply your data by 0.29307. - Conversion factors from other energy units are available from a variety of online calculation tools, including from IEA and OnlineConversion.com, or from conversion tables such as those in EPA AP-42 (Annex A). - If your raw data is in volume units, e.g., cubic feet or gallons, or in mass units, e.g., kilograms (kg) or pounds (lb), then you should convert to energy units using factors for fuel heating/calorific values. These are available from numerous sources, some of which are listed below: IPCC Guidelines for National GHG Inventories (Volume 2, Table 1.2, p1.18-1.19) EPA AP-42 (Annex A) IEA Statistics Manual (Annex 3, p180-183) API Compendium (Table 3-8, p3.20-3.21) - If your raw data for steam is in physical units, such as pounds (lb) or kilograms (kg), then you should convert to energy units. The energy content of steam varies with temperature and pressure. Organizations can refer to The Climate Registry’s General Reporting Protocol, Chapter 15, section 15.2, step 1, which explains how to calculate the energy content of steam. - Cooling is frequently purchased in refrigeration-ton hours; 1 ton-hour is equal to 12,000 Btu, which is equally to 0.003516 MWh. Data Requirements Disclosure requirements for partially public questions. Additional credit will be granted for relevant publicly available evidence covering the following aspect of this question: - Total non-renewable energy consumption for at least the most recent reported year. Third-party verification: For third-party verification, we expect that data in the most recent year reported has been third-party verified and that relevant documentation is attached showing this verification. Internal audits or verification will not be considered. Please note: In case the company has reported a value of zero in the table, third-party verification or supporting evidence is required (e.g., comprehensive comment, internal documentation or public reporting) to substantiate the zero reported. For this question, we encourage you to provide evidence that is publicly available and may grant additional credit for publicly available evidence. Please note: In cases where the company is classified within the Banks (BNK), Financial Services (FBN), Insurance (INS), or Professional Services (PRO) industries, the score obtained in this question will not contribute to the final score of the company.

2.2 Waste & Pollutants

The shift towards a circular economy continues to grow in importance as the waste crisis escalates. From design and planning to end of life, the proper treatment of waste can enhance a company’s competitiveness through reduced costs and environmental liabilities. Integrating programs within company operations to reduce waste is considered one of the best practices in minimizing environmental and social impact when seeking new business opportunities. Additionally, measuring waste generated allows companies to track progress, set meaningful targets, better prepare for future regulation and address stakeholder expectations. The focus of this criterion is to identify the management and trends of waste across business operations.
2.2.1 Waste Disposal

Additional credit may be granted for publicly available evidence.

Please provide a breakdown of your company's **total solid waste recycled/reused and disposed**, disaggregated by the type of disposal method, for the part of your company's operations for which you have a reliable and auditable data acquisition and aggregation system. If you don’t use a specific waste disposal method, please indicate “0”. If you only have the breakdown of your waste disposed for some methods, please report these values in the respective rows and leave the other rows blank.

For each row in the table, it is mandatory that the values provided are in the same unit. Please also ensure that you have correctly filled in the "Company Information" section at the beginning of the questionnaire and that the coverage in the table below is related to the denominator relevant for your company as indicated in that section.

If you have the **EP - Hazardous Waste, EP – Ash & Gypsum Waste and/or EP - Mineral Waste questions** in your industry questionnaire, please report information pertaining to these types of waste in those separate questions. If you **do not** have those questions in your industry questionnaire, please include all types of data here (e.g., including hazardous waste).

<table>
<thead>
<tr>
<th></th>
<th>Unit</th>
<th>FY 2020</th>
<th>FY 2021</th>
<th>FY 2022</th>
<th>FY 2023</th>
<th>What was your target for FY 2023?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total waste recycled/reused</strong></td>
<td>metric tonnes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total waste disposed</strong></td>
<td>metric tonnes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Waste landfilled</td>
<td>metric tonnes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Waste incinerated with energy recovery</td>
<td>metric tonnes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Waste incinerated without energy recovery</td>
<td>metric tonnes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Waste otherwise disposed, please specify:</td>
<td>metric tonnes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Waste with unknown disposal method</td>
<td>metric tonnes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Data coverage (as % of denominator)</strong></td>
<td>percentage</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
PUBLIC REPORTING

- Our data on total waste disposed and/or waste generated and recycled/reused (for at least the most recent financial year reported) is publicly available. Please provide supporting evidence or web link.

THIRD-PARTY VERIFICATION

- Our data has been third-party verified in the most recent financial year reported. Please provide supporting evidence.

DATA CONSISTENCY

- We report publicly on this information, but the data in the table above differs from our publicly reported figures. Please provide an explanation in the comment box for this difference:

- We have a temporary coverage reduction or target challenge due to corporate actions. Please briefly explain if a merger, acquisition, divestment, etc. has temporarily caused a reduction in your ability to report optimal coverage or caused your target to appear abnormal:

- We are not able to report this information in absolute terms, the information provided in the table above is normalized data. For the purpose of this question, please always provide absolute figures if available.

- We do not track solid waste disposed.
- Not applicable. Please provide explanations in the comment box below.
- Not known

Info Text:

Question Rationale: The proper handling of waste can enhance companies’ competitiveness through reduced costs and environmental liabilities. It can also mean companies are better prepared for future environmental regulations. This question addresses trends in waste disposal and recycling, specific to each industry, as well as the target set for the current financial year. Key Definitions:

Total waste recycled/reused: This includes the part of the waste generated as a result of a company’s operations (e.g., during extraction and processing of raw materials, manufacturing, consumption of final products or any other human activity), which has been diverted from disposal through preparation for reuse, recycling, composting or other recovery operations (i.e., processing of waste products, components or materials to be reused in place of new products, components or materials that should otherwise have been used for that purpose). This does not include waste incinerated with energy recovery (which is expected to be captured as part of the specific row under total waste disposed), or waste handled by third-parties (e.g., municipal waste management companies) unless it is clear that the waste is being recycled, prepared for reuse or composted by the third-party (see additional clarification in “Special data requirement for Waste”).

Total waste disposed: This is the total of all waste directed to disposal, including waste landfilled, incinerated with energy recovery, incinerated without energy recovery or otherwise disposed (e.g., deep well injection). It also captures waste with “unknown disposal methods”, such as waste handled by municipal waste management companies without any information available on the disposal methods used. For each method of disposal, the value includes both on and off-site disposal. Data Requirements:

Specific data requirements for waste: Waste should be reported in dry metric tons of waste, disaggregated by the amount recycled/reused and the specific disposal method (waste landfilled, waste incinerated with or without energy recovery, waste otherwise disposed or waste with unknown disposal method), respectively. - In case the company reports zero total waste disposed, third-party verification or supporting evidence is required (e.g., comprehensive comment, internal documentation or public reporting) to substantiate zero waste disposed - If you only have information available on the waste disposed by some or no specific disposal methods (waste landfilled, waste incinerated with or without energy recovery, otherwise disposed), please report the total waste disposed and the values for those disposal methods for which you have reliable data. The rows for disposal methods without available data should be left blank. The difference between total waste disposed and the sum of the specific disposal methods will be automatically captured in the row “waste with unknown disposal method”. Please note that the company will not lose points if no detailed breakdown of the disposal methods used is available. For companies who have the questions “Hazardous Waste”, “Ash and Gypsum Waste” or “Mineral Waste” in their questionnaire, please do not report information on these types of waste here but rather, report relevant data for these types of waste separately in those questions. For example: if a company has the question on “Waste Disposal” and the question on “Hazardous Waste” in the questionnaire, non-hazardous waste should be captured in the question on “Waste Disposal” and hazardous waste in the question on “Hazardous Waste”, respectively. If you do not have those questions in your industry questionnaire, please include all types of waste in this question. If a company sets long-term but not annual targets, an
annual target can be estimated based on internal target setting or a linear distribution. If a company does not have a specific target on waste disposed but specific (internal or public) targets on waste generated and/or recycled, the conversion to a waste disposed target is acceptable. Waste from extraordinary activities should not be considered. The definition of what is considered to be extraordinary should be consistent with financial reporting. Example: we would not expect a pharmaceutical company building its new headquarters to report the resulting construction waste. Disclosure requirements for partially public question. Additional credit will be granted for relevant publicly available evidence covering the following aspect of this question:
- Total waste disposed figure (or alternatively, total waste generated and recycled figures) for at least the most recent reported year. The specific breakdown of the disposal methods used is not required to be publicly available. Third-party verification: For third-party verification, we expect that data in the most recent year reported has been third-party verified and that relevant documentation is attached showing this verification. Internal audits or verification will not be considered. Please note: In cases where the company is classified within the Banks (BNK), Financial Services (FBN), Insurance (INS), or Professional Services (PRO) industries, the score obtained in this question will not contribute to the final score of the company. Data Consistency - If the environmental performance data reported in the questionnaire do not correspond to the publicly reported figures, the corresponding option should be marked and the discrepancy should be explained. This option should not be indicated if the information is not publicly reported at all. - If there is a temporary reduction in coverage due to, for example, a major acquisition, the corresponding box should be marked and the reduction should be explained. - If it is not possible to report the figures in absolute terms, the data should be reported in relative terms and the corresponding box should be ticked. Please note that information should always be reported in absolute terms if possible, even if it deviates from public reporting. - If the data reported are not consistent with the definition provided above, the data should be provided in the table, the option should be marked, and an explanation of how it differs should be provided in the comment box. General Data Requirements Environmental performance data should cover the activities of the entire company with the same consolidation as used in financial reporting and must refer to the financial year (e.g., 01/01 to 31/12 for both financial and environmental data) and be aligned with the figures reported in the Company Information section question. In particular, environmental data of group companies should follow the following rules:
- Environmental data of companies that are consolidated proportionally must be considered to the proportion at which they are consolidated financially. - Environmental data of companies that are fully consolidated must be fully considered irrespective of the proportion to which they belong to the group. - Environmental data should refer to the specific company structure of each particular year. There should be no pro-forma backward consolidation of the current company structure. - Environmental data of companies that are sold or no longer consolidated should be excluded from environmental data as of the reporting period in which the company has not been consolidated anymore. - Environmental data of companies that have been bought should only be included as of the reporting period in which the company is consolidated financially for the first time. - Where environmental data does not cover all consolidated activities of the company, the scope should be indicated together with the environmental data that is known. - Where the reported environmental data deviates from these definitions you are asked to explain in what way the data provided differs from the definitions. - Please ensure that the Company Information section has been correctly filled in, and that the coverage in the table below is based on the same denominator. References Directive 2008/98/EC of the European Parliament and of the Council (Waste Framework Directive)

2.3 Water

Water is becoming increasingly scarce, and such scarcity poses a considerable risk to many sectors. Considering water consumption and exposure to water risks along the value chain of business operations can enhance companies’ competitiveness by reducing costs and environmental liabilities. It can also mean companies are better prepared for future environmental regulations. The key focus of this criterion is to identify trends of water use and the extent to which companies have considered their risks and exposure to water-related issues.

2.3.1 Water Consumption
Additional credit may be granted for publicly available evidence.

Please provide your company's **total freshwater consumption**, including data for water discharge and withdrawal. Please refer to the information button for additional information. For each row in the table, it is mandatory that the values are provided in the same unit. Also, please ensure that you have correctly filled in the Company Information section at the beginning of the questionnaire and that the coverage in the table below is related to the denominator relevant for your company as indicated in that section.

<table>
<thead>
<tr>
<th>Units</th>
<th>FY 2020</th>
<th>FY 2021</th>
<th>FY 2022</th>
<th>FY 2023</th>
<th>Please indicate your target for FY 2023</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Water withdrawal (excluding saltwater)</td>
<td>Million cubic meters</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>B. Water discharge (excluding saltwater)</td>
<td>Million cubic meters</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total net fresh water consumption (A-B)</td>
<td>Million cubic meters</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Data coverage</td>
<td>Percentage of</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**PUBLIC REPORTING**
- Our data is publicly available. Please provide supporting evidence or web link.

**THIRD PARTY VERIFICATION**
- Our data has been third-party verified in the most recent financial year reported. Please provide supporting evidence.

**DATA CONSISTENCY**
- We report publicly on this information, but the data in the table above differs from our publicly reported figures. Please provide an explanation in the comment box for this difference:

- We have a temporary coverage reduction or target challenge due to corporate actions. Please briefly explain if a merger, acquisition, divestment, etc., has temporarily caused a reduction in your ability to report optimal coverage or caused your target to appear abnormal:

- We are not able to report this information in absolute terms, the information provided in the table above is normalized data. For the purpose of this question, please always provided absolute figures if available.

- We do not track water withdrawal.
- Not applicable. Please provide explanations in the comment box below.
- Not known

**Info Text:**
Question Rationale Water is becoming increasingly scarce, and such scarcity poses a considerable risk to many sectors. Considering water withdrawal, consumption and discharge practices can enhance companies’ competitiveness by reducing costs and environmental liabilities. It can also mean companies are better prepared for future environmental regulations. Key Definitions Water withdrawal (excluding saltwater): Water withdrawal is defined as the sum of: i. Fresh surface water, including rainwater, water from wetlands, rivers and lakes ii. Groundwater – renewable and non-renewable iii. Produced/entrained water iv. Third party sources Fresh surface water: Fresh surface water, including rainwater, water from wetlands, rivers,
2.4 Climate Strategy

lakes and fresh water that requires minimal treatment to be acceptable for domestic or agricultural uses. Groundwater - renewable and non-renewable: Groundwater that can be recovered from underground. Produced/entrained water: Produced water, reinjected produced water. Third party sources: Municipal water, local third-party water purchase, city water from public water department, trucked water purchased, tap water and reclaimed water. Water discharge (excluding saltwater): The water leaving the organization’s boundary and being released to surface water, groundwater or third parties during the reporting year. Total net fresh water consumption: Water withdrawal (excluding saltwater) – water discharge (excluding saltwater).

Data Requirements - If the company is reporting on brackish surface water/seawater/saltwater, please deduct it from water withdrawal and water discharge, because we want to capture only total net fresh water consumption. - Third-party verification: For third-party verification, we expect that data in the most recent year reported has been third-party verified and that relevant documentation is attached showing this verification. Internal audits or verification will not be considered. - Please note: If the company has reported a value of zero in the table, third-party verification or supporting evidence is required (e.g., comprehensive comment, internal documentation or public reporting) to substantiate the zero reported. - Please note: In cases where the company is classified within the Banks (BNK), Financial Services (FBN), Insurance (INS), or Professional Services (PRO) industries, the score obtained in this question will not contribute to the final score of the company. Data Consistency - If the environmental performance data reported in the questionnaire does not correspond to publicly reported figures, the corresponding option should be marked and the discrepancy should be explained. This option should not be indicated if the information is not publicly reported at all. - If there is a temporary reduction in coverage due to, for example, a major acquisition, the corresponding box should be marked and the reduction explained. - If it is not possible to report the figures in absolute terms, the data should be reported in relative terms, and the corresponding box should be ticked. Please note that information should always be reported in absolute terms if possible, even if it deviates from public reporting. General Data Requirements Environmental performance data should cover the activities of the entire company, with the same consolidation as used in financial reporting, and it must refer to the financial year (e.g., 01/01 to 31/12 for both financial and environmental data) and be aligned with the figures reported in the Company Information section. Target: We require the absolute target for the most recent reporting year. If your company has a multiple year and/or relative target, please extrapolate what the target value would have to be for the last financial year to make sure you are progressing well towards achieving the target by the end of the target period. In particular, environmental data of group companies should follow these rules: - Environmental data of companies that are consolidated proportionally must be considered in proportion to how they are consolidated financially. - Environmental data of companies that are fully consolidated must be fully considered irrespective of the proportion to which they belong to the group. - Environmental data of business travel other than by an owned and/or operated fleet should not be included unless specifically asked for. - Environmental data should refer to the specific company structure of each particular year. There should be no pro forma backward consolidation of the current company structure. - Environmental data of companies that are sold or no longer consolidated should be excluded from environmental data as of the reporting period in which the company was no longer consolidated. - Environmental data of companies that have been bought should only be included as of the reporting period in which the company was consolidated financially for the first time. - Where environmental data does not cover all consolidated activities of the company, the scope should be indicated together with the environmental data that is known. - Where the reported environmental data deviates from these definitions, you are asked to explain in what way the data provided differs from the definitions. - If a company publicly reports on long-term but not annual targets, an annual target must be estimated based on internal target setting or a linear distribution. - The data must be provided in the unit indicated in the question. If the company is tracking the specific indicator in a different unit, the unit converter must be used to convert the data into the preferred unit. - Please ensure that the Company Information section has been filled in correctly and that the coverage in the table below is based on the same denominator. Disclosure Requirements Disclosure requirements for a partially public question. Additional credit will be granted for relevant publicly available evidence covering the following aspect of this question: - Total net fresh water consumption for at least the most recent reported year. References CDP - Water Security 2022 Reporting Guidance: https://guidance.cdp.net/en/guidance?cid=35&ctype=themekidtype=ThemelD&incchild=1&microsite=0&doctype=Guidance&tags=TAG-597%2CTAG-607%2CTAG-599

Most industries will be impacted by climate change, albeit to a varying degree. The need for robust strategies to meet the scale of the challenge is growing ever more significant. There is increasing focus not only on identifying the risks and opportunities of climate change but also managing these risks, setting targets, and ensuring appropriate governance and oversight at all levels of the business. As the number of climate-related mandatory and voluntary disclosure frameworks and standards increase, companies must remain vigilant at not only assessing their own exposure to climate but also documenting this in a way that meets disclosure requirements.

The majority of the questions in this criterion have been developed in alignment with the CDP methodology (https://www.cdp.net). Additionally, many questions in this criterion are aligned with the Task Force on Climate-related Financial Disclosure (TCFD) which published in 2017 a set of recommendations for voluntary and consistent climate-related financial risk disclosures in mainstream reporting. While the developed disclosure recommendations are voluntary, investors’ demand for companies to report in line with TCFD is growing exponentially and governments are starting to move toward requiring TCFD disclosures through regulation.

Finally, the EU action plan on sustainable finance and its EU Taxonomy Regulation on the establishment of a framework to facilitate sustainable investment have also been considered in the further development of this criterion. (Regulation (EU) 2020/852).

2.4.1 Direct Greenhouse Gas Emissions (Scope 1)

Additional credit may be granted for publicly available evidence.

Please provide your company’s total direct greenhouse gas emissions (DGHG SCOPE 1) for the part of your company’s operations for which you have a reliable and auditable data acquisition and aggregation system. Please refer to the information button for additional clarifications. For each row in the table, it is mandatory that the values provided are in the same unit. Also, please ensure that you have correctly filled in the Company Information section at the beginning of the questionnaire, and that the coverage in the table below is related to the denominator relevant for your company as indicated in that section.

<table>
<thead>
<tr>
<th>Direct GHG (Scope 1)</th>
<th>Unit</th>
<th>FY 2020</th>
<th>FY 2021</th>
<th>FY 2022</th>
<th>FY 2023</th>
<th>What was your target for FY 2023?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total direct GHG emissions (Scope 1)</td>
<td>metric tonnes CO2 equivalents</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Data coverage (as % of denominator)</td>
<td>percentage of:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

PUBLIC REPORTING

- Our data is publicly available. Please provide supporting evidence or web link.

THIRD-PARTY VERIFICATION

- Our data has been third-party verified in the most recent financial year reported. Please provide supporting evidence.

DATA CONSISTENCY

- We report publicly on this information, but the data in the table above differs from our publicly reported figures. Please provide an explanation in the comment box for this difference:

- We have a temporary coverage reduction or target challenge due to corporate actions. Please briefly explain if a merger, acquisition, divestment, etc. has temporarily caused a reduction in your ability to report optimal coverage or caused your target to appear abnormal:
We are not able to report this information in absolute terms, the information provided in the table above is normalized data. For the purpose of this question, please always provide absolute figures if available.

We only report combined on Scope 1 & Scope 2 emissions. Please provide the combined figures in the table above and mark "Not applicable" in the next question (EP - Indirect Greenhouse Gas Emissions (Scope 2)).

We do not track direct greenhouse gas emissions (Scope 1).

Not applicable. Please provide explanations in the comment box below.

Not known

Info Text:
Question Rationale The purpose of this question is to capture the company's direct greenhouse gas (Scope 1) emissions and assess the overall trend. Emissions can serve as a critical indicator of a company's impact on the climate. Increasingly, the disclosure of emissions is expected from investors, and growing regulatory pressure has led to the mandatory disclosure of certain emissions. By disclosing emissions, investors and stakeholders can ascertain a company's climate risks and identify trends in emissions reduction to benchmark against competitors. Key Definitions GHG scope 1: Greenhouse gas emissions (GHGs) refer to emissions of the six main GHGs that are covered by the Kyoto Protocol. These gases are outlined below. Each GHG has a different capacity to cause global warming, depending on its radiative properties, its molecular weight and its lifespan in the atmosphere. Greenhouse Gases covered by the Kyoto Protocol: Carbon Dioxide - CO2: Emitted mainly from the burning of fossil fuels, carbon dioxide accounted for some 86 percent of the UK's human-induced (anthropogenic) GHG emissions in 2003. Methane - CH4: Emitted mainly from agriculture, waste disposal, leakage from the gas distribution system and coal mining, methane contributed to over 6 percent of UK anthropogenic GHG emissions in 2003. Nitrous Oxide - N2O: The main anthropogenic sources of nitrous oxide emissions are agriculture, transport, industrial processes, and coal combustion. Nitrous oxide accounted for approx. 6 percent of UK GHG emissions in 2003. Hydrofluorocarbons - HFCs, Perfluorocarbons - PFCs and Sulphur Hexafluoride - SF6: Collectively known as "F-gases", these are emitted mainly from air conditioning and refrigeration and industrial processes. Together F-gases accounted for around 2 percent of the UK anthropogenic GHG emissions in 2003. Emissions from biologically sequestered carbon: in accordance with the GHG Protocol, emissions data for direct CO2 emissions from biologically sequestered carbon (e.g., CO2 from burning biomass/biofuels) must be reported separately from the Scopes. Data Requirements Specific data requirements for Greenhouse gas emissions: - Greenhouse gas emissions should be reported as metric tons of CO2-equivalents. - Data on greenhouse gas emissions should only include CO2 and all other greenhouse gas emissions. - All greenhouse gas emissions emitted directly by the company should be reported. - Greenhouse gas emissions of owned and/or managed fleet must be included. - Greenhouse gas emissions due to commuting of employees should not be included. - Greenhouse gas emissions of business travel other than by owned and/or operated fleet should not be included. Disclosure requirements for partially public question. Additional credit will be granted for relevant publicly available evidence covering the following aspect of this question: - Direct Greenhouse Gas Emissions (Scope 1) figure for at least the most recent reported year. Third-party verification: For third-party verification, we expect that data in the most recent year reported has been third-party verified and that relevant documentation is attached showing this verification. Internal audits or verification will not be considered. Please note: In case the company has reported a value of zero in the table, third-party verification or supporting evidence is required (e.g., comprehensive comment, internal documentation or public reporting) to substantiate the zero reported. Data Consistency - If the environmental performance data reported in the questionnaire do not correspond to the publicly reported figures, the corresponding option should be marked and the discrepancy should be explained. This option should not be indicated if the information is not publicly reported at all - If there is a temporary reduction in coverage due to a corporate action, the corresponding box should be marked and the reduction should be explained - If it is not possible to report the figures in absolute terms, the data should be reported in relative terms and the corresponding box should be ticked. Please note that information should always be reported in absolute terms if possible, even if it deviates from public reporting. - If GHG emissions are only reported and tracked as combined Scope 1 and Scope 2 emissions, the combined figures should be indicated in this question, the corresponding box should be ticked and the following question, EP – Indirect Greenhouse Gas Emissions (Scope 2), should be marked as "Not applicable". General Data Requirements Environmental performance data should cover the activities of the entire company with the same consolidation as used in financial reporting and must refer to the financial year (e.g., 01/01 to 31/12 for both financial and environmental data) and be aligned with the figures reported in the Company Information section. Target: We require the absolute target for the most recent reporting year. If your company has a multiple-year and/or relative target, please extrapolate what the target value would have to be for the last financial year to make sure you are progressing well toward...
achieving the target by the end of the target period. If you report a combined Scope 1 + Scope 2 target, please extrapolate the share equivalent to the absolute Scope 1 emission for inclusion in the table. As a consequence, environmental performance data should only cover the direct emissions/resource use, i.e., resource use/emissions caused by the company and its consolidated activities. Emissions and resource use of suppliers and customers should be excluded. In particular, the environmental data of group companies should follow the following rules: - Environmental data of companies that are consolidated proportionally must be considered to the proportion at which they are consolidated financially. - Environmental data of companies that are fully consolidated must be fully considered irrespective of the proportion to which they belong to the group. - Environmental data should refer to the specific company structure of each particular year. There should be no pro-forma backward consolidation of the current company structure. - Environmental data of companies that are sold or no longer consolidated should be excluded from environmental data as of the reporting period in which the company has not been consolidated anymore. - Environmental data of companies that have been bought should only be included as of the reporting period in which the company is consolidated financially for the first time. - Where environmental data does not cover all consolidated activities of the company, the coverage should be indicated together with the environmental data that is known. - Indicators where a company has no emissions/resource use, 0 should be filled. - Where the reported environmental data deviates from these definitions you are asked to explain in what way the data provided differs from the definitions. - If a company publicly reports on long-term but not annual targets, an annual target has to be estimated based on internal target setting or a linear distribution. - The data must be provided in the unit indicated in the question. If the company is tracking the specific indicator in a different unit, the unit converter must be used to convert the data into the preferred unit. - Please ensure that the "Company Information" section has been correctly filled in, and that the coverage in the table below is based on the same denominator.

2.4.2 Indirect Greenhouse Gas Emissions (Scope 2)

Additional credit may be granted for publicly available evidence.

Please provide your company's indirect greenhouse gas emissions from energy purchased (purchased and consumed, i.e. without energy trading) (IGHG SCOPE 2) for the part of your company's operations for which you have a reliable and auditable data acquisition and aggregation system. For each row in the table, it is mandatory that the values provided are in the same unit. Please ensure that you have correctly filled in the Company Information section at the beginning of the questionnaire, and that the coverage in the table below is related to the denominator relevant for your company as indicated in that section. As prescribed by the GHG Protocol, we expect all companies to report both location-based and market-based emissions. Please refer to the information button for additional clarifications on how to report on market-based emissions.

<table>
<thead>
<tr>
<th>IGHG (Scope 2)</th>
<th>Unit</th>
<th>FY 2020</th>
<th>FY 2021</th>
<th>FY 2022</th>
<th>FY 2023</th>
<th>What was your target for FY 2023?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location-based</td>
<td>metric tonnes of CO2 equivalents</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Data coverage (as % of denominator)</td>
<td>percentage of:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Market-based</td>
<td>metric tonnes of CO2 equivalents</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Data coverage (as % of denominator)</td>
<td>percentage of:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

PUBLIC REPORTING

- Our data is publicly available. Please provide supporting evidence or web link.

THIRD-PARTY VERIFICATION
Our data has been third-party verified in the most recent financial year reported. Please provide supporting evidence.

DATA CONSISTENCY

- We report publicly on this information, but the data in the table above differs from our publicly reported figures. Please provide an explanation in the comment box for this difference:

- We have a temporary coverage reduction or target challenge due to corporate actions. Please briefly explain if a merger, acquisition, divestment, etc. has temporarily caused a reduction in your ability to report optimal coverage or caused your target to appear abnormal:

- We are not able to report this information in absolute terms, the information provided in the table above is normalized data. For the purpose of this question, please always provide absolute figures if available.

- We do not track indirect greenhouse gas emissions.

- Not applicable. Please provide explanations in the comment box below.

- Not known

Info Text:

Question Rationale: The purpose of this question is to capture the company's indirect greenhouse gas (Scope 2) emissions and assess the overall trend. Emissions can serve as a critical indicator of a company's impact on the climate. Increasingly, the disclosure of emissions is expected from investors, and growing regulatory pressure has led to the mandatory disclosure of certain emissions. By disclosing emissions, investors and stakeholders can ascertain a company's climate risks and identify trends in emissions reduction to benchmark against competitors. Key Definitions: GHG scope 2: Indirect impacts - energy use: Many companies report on the GHG emissions incurred in the generation of the electricity they consume and for service companies these indirect emissions can be more important than their direct environmental impacts. There are also some ways that companies can mitigate these emissions, for example by paying a renewable tariff or improving energy efficiency. Location-based method: It reflects the average emissions intensity of grids on which energy consumption occurs (using mostly grid-average emission factor data). Market-based method: It reflects emissions from electricity that companies have purposefully chosen (or their lack of choice). It derives emission factors from contractual instruments, which include any type of contract between two parties for the sale and purchase of energy bundled certificates or for unbundled instruments on their own. Even companies that do not purchase any market instrument are expected to report market-based emissions. As per the GHG Protocol's requirements, they shall do so by using their electricity supplier's emission rate, or by using the residual mix, i.e., regional emission factors representing the untracked or unclaimed energy and emissions. If such data is not available, then their market-based emissions will be equal to their location-based emissions. Data Requirements: Greenhouse gas emissions should be reported as metric tons of CO2-equivalents. Data on greenhouse gas emissions should include CO2 and all other greenhouse gas emissions weighted according to greenhouse gas potential. Please report both your location-based emissions, as well as your market-based emissions. Disclosure requirements for partially public question. Additional credit will be granted for relevant publicly available evidence covering the following aspect of this question: - Indirect greenhouse gas emissions (Scope 2) figure for at least the most recent reported year for at least one of the two Scope 2 reporting methods. Third-party verification: We expect that data in the most recent year reported, for at least one reporting method, has been third-party verified and that relevant documentation is attached showing this verification. Internal audits or verification will not be considered. Please note: In case the company has reported a value of zero in the table, third-party verification or supporting evidence is required (e.g., comprehensive comment, internal documentation or public reporting) to substantiate the zero reported. Data Consistency - If the environmental performance data reported in the questionnaire do not correspond to the publicly reported figures, the corresponding option should be marked and the discrepancy should be explained. This option should not be indicated if the information is not publicly reported at all. - If there is a temporary reduction in coverage due to a corporation action, the corresponding box should be marked and the reduction should be explained - If it is not possible to report the figures in absolute terms, the data should be reported in relative terms and the corresponding box should be ticked. Please note that information should always be reported in absolute terms if possible, even if it deviates from public reporting. - If GHG emissions are only reported and tracked as combined Scope 1 and Scope 2 emissions, the combined figures should be indicated in the previous question (Direct Greenhouse Gas Emissions (Scope 1)), the corresponding box should be ticked and this question should be marked as “Not applicable”. General Data Requirements: Environmental performance data should cover the activities of the entire company with the same consolidation as used in financial reporting.
and must refer to the financial year (e.g., 01/01 to 31/12 for both financial and environmental data) and be aligned with the figures reported in the Company Information section. Target: we require the absolute target for the most recent reporting year. If your company has a multiple-year and/or relative target, please extrapolate what the target value would have to be for the last financial year to make sure you are progressing well towards achieving the target by the end of the target period. If you report a combined Scope 1 + Scope 2 target, please extrapolate the share equivalent to the absolute Scope 2 emissions for inclusion in the table. Environmental performance data should only cover the indirect emissions/resource use, i.e., resource use/emissions caused by the company and its consolidated activities. Emissions and resource use of suppliers and customers should be excluded. In particular, the environmental data of group companies should follow the following rules: - Environmental data of companies that are consolidated proportionally must be considered to the proportion at which they are consolidated financially. - Environmental data of companies that are fully consolidated must be fully considered irrespective of the proportion to which they belong to the group. - Environmental data of business travel other than by owned and/or operated fleet should not be included unless specifically asked for. - Environmental data should refer to the specific company structure of each particular year. There should be no pro-forma backward consolidation of the current company structure. - Environmental data of companies that are sold or no longer consolidated should be excluded from environmental data as of the reporting period in which the company has not been consolidated anymore. - Environmental data of companies that have been bought should only be included as of the reporting period in which the company is consolidated financially for the first time. - Where environmental data does not cover all consolidated activities of the company, the scope should be indicated together with the environmental data that is known. - For indicators where a company has no emissions/resource use, 0 should be filled. - Where the reported environmental data deviates from these definitions you are asked to explain in what way the data provided differs from the definitions. - If a company publicly reports on long-term but not annual targets, an annual target has to be estimated based on internal target setting or a linear distribution. - The data must be provided in the unit indicated in the question. If the company is tracking the specific indicator in a different unit, the unit converter must be used to convert the data into the preferred unit. - Please ensure that the Company Information section has been correctly filled in, and that the coverage in the table below is based on the same denominator. References GHG Protocol Scope 2 Guidance, An amendment to the GHG Protocol Corporate Standard (2015), page 59. CDP Technical Note: Accounting of Scope 2 emissions, updated in March 2022, page 20-21

2.4.3 Indirect Greenhouse Gas Emissions (Scope 3)

Additional credit may be granted for publicly available evidence.

Please provide your company's total indirect greenhouse gas emissions from your upstream and downstream value chain (IGHG Scope 3) as the sum of the 15 Scope 3 categories calculated using the GHG Protocol Corporate Value Chain Standard. Please refer to the information button for clarification. For each row in the table, it is mandatory that the values provided are in the same unit.

<table>
<thead>
<tr>
<th>IGHG (Scope 3)</th>
<th>Unit</th>
<th>FY 2020</th>
<th>FY 2021</th>
<th>FY 2022</th>
<th>FY 2023</th>
<th>What was your target for FY 2023?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total indirect GHG emissions (Scope 3)</td>
<td>metric tonnes of CO2 equivalents</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Please provide your company’s Scope 3 emissions split based on the 15 Scope 3 categories of the GHG Protocol Corporate Value Chain Standard. Please use the latest available data to calculate Scope 3 emissions. Disclose any information about the methodology used to calculate the emissions in each Scope 3 category and whether any emissions in each Scope 3 category has been excluded. Please refer to the information button for additional clarifications and requirements. For each row in the table, it is mandatory that the values provided are in the same unit.

<table>
<thead>
<tr>
<th>Scope 3 Category</th>
<th>Emissions in the reporting year (Metric tons CO2e)</th>
<th>Emissions calculation methodology and exclusions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Purchased Goods and Services</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Scope 3 Category

<table>
<thead>
<tr>
<th>Category</th>
<th>Emissions in the reporting year (Metric tons CO2e)</th>
<th>Emissions calculation methodology and exclusions</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Capital Goods</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. Fuel-and-energy-related-activities (not included in Scope 1 or 2)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. Upstream transportation and distribution</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. Waste generated in operations</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6. Business travel</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7. Employee commuting</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8. Upstream leased assets</td>
<td></td>
<td></td>
</tr>
<tr>
<td>9. Downstream transportation and distribution</td>
<td></td>
<td></td>
</tr>
<tr>
<td>10. Processing of sold products</td>
<td></td>
<td></td>
</tr>
<tr>
<td>11. Use of sold products</td>
<td></td>
<td></td>
</tr>
<tr>
<td>12. End of life treatment of sold products</td>
<td></td>
<td></td>
</tr>
<tr>
<td>13. Downstream leased assets</td>
<td></td>
<td></td>
</tr>
<tr>
<td>14. Franchises</td>
<td></td>
<td></td>
</tr>
<tr>
<td>15. Investments</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other upstream</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other downstream</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- The majority of our company's revenues is generated through Royalties

**PUBLIC REPORTING**

- Our data is publicly available. Please provide supporting evidence or web link.

**THIRD-PARTY VERIFICATION**

- Our data has been third-party verified in the most recent financial year reported. Please provide supporting evidence.

**DATA CONSISTENCY**

- We report publicly on this information, but the data in the table above differs from our publicly reported figures. Please provide an explanation in the comment box for this difference:

- We have a temporary coverage reduction or target challenge due to corporate actions. Please briefly explain if a merger, acquisition, divestment, etc. has temporarily caused a reduction in your ability to report optimal coverage or caused your target to appear abnormal:

- We are not able to report this information in absolute terms, the information provided in the table above is normalized data. For the purpose of this question, please always provide absolute figures if available.

- We do not track indirect greenhouse gas emissions (Scope 3).
- Not applicable. Please provide explanations in the comment box below.
- Not known

**Info Text:**

Question Rationale: The purpose of this question is to capture indirect emissions from the value chain (Scope 3 emissions) and assess the overall trend. Scope 3 emissions represent the majority of emissions for most industries, so it is crucial for companies to measure all relevant sources of Scope 3 emissions.
in their value chain to identify climate risks and opportunities, provide transparency to the markets, and comply with regulatory requirements. Key Definitions GHG Scope 3: Scope 3 refers to indirect emissions that are a consequence of the activities of the company but occur from sources not owned or controlled by the company. The GHG Protocol divides Scope 3 emissions in 15 Scope 3 categories that cover the upstream and downstream value chain activities of the company. Examples of upstream Scope 3 activities are the extraction and production of purchased materials and transportation of purchased fuels. Examples of downstream activities are the use of sold products and services and the transportation of sold goods. Relevance: This refers to one of the five principles of the GHG Protocol’s Corporate Value Chain Accounting and Reporting Standard, which states that the scope 3 inventory should be based on the assumption that it ensures the GHG inventory appropriately reflects the GHG emissions of the company and serves users’ decision-making needs – both within and beyond the company. Companies should use the principle of relevance when determining whether to exclude activities from the inventory boundary. Companies should also use the principle of relevance as a guide when selecting data sources. According to the GHG Protocol, companies may use two types of data to calculate scope 3 emissions: primary and secondary data. Primary data: includes data provided by suppliers or others that directly relate to specific activities in the reporting company’s value chain. Primary activity data may be obtained through meter readings, purchase records, utility bills, engineering models, direct monitoring, mass balance, stoichiometry, or other methods for obtaining data from specific activities in the company’s value chain. Secondary data: includes industry average data (e.g., from published databases, government statistics, literature reviews, and industry associations), financial data, proxy data, and other generic data. In specific cases, companies may use specific data from one activity in the value chain to estimate emissions for another activity in the value chain. This type of data (i.e., proxy data) is considered secondary data, since it is not specific to the activity for which emissions are being calculated. Source: GHG Protocol Data Requirements For this question, our expectations are aligned with the guidelines of the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard. That means that we expect companies to account for all scope 3 emissions and disclose and justify any exclusions (Completeness Principle of the GHG Protocol Scope 3 Standard). Emissions calculation methodology and exclusions: please provide a short description of the types and sources of data used to calculate emissions (e.g., activity data, emission factors and GWP values), along with a description of the methodologies, assumptions and allocation methods used. Please also describe what has been excluded from the emissions calculation of each reported Scope 3 category (e.g., exclusions of specific suppliers/clients, of specific business units, countries, offices, plants, or exclusions of specific types of greenhouse gases, etc.) and justify the reasons for exclusion. Specific data requirements for Greenhouse gas emissions: Greenhouse gas emissions should be reported as metric tons of CO2-equivalents. Data on greenhouse gas emissions should include CO2 and all other greenhouse gas emissions weighted according to greenhouse gas potential. All greenhouse gas emissions emitted in the upstream and downstream value chain of the company should be reported, if these are material/relevant. Companies should not exclude any activity that is expected to contribute significantly to the company’s total Scope 3 emissions. GHG emissions reported in the first table and within each Scope 3 category should be as complete as possible, even if considerable estimations were needed. In the second table we expect Scope 3 emissions to be disclosed for at least 5 distinct categories. Industry-Specific Guidance - Companies in all industries are expected to disclose Scope 3 emissions for category 1 “Purchased Goods and Services”. - Companies operating in the industry groups of Energy (COL, OGX, OGR, GAS, PIP industries), Automobiles & Components (AUT and ATX industries) and in the Homebuilding industry (HOM) are expected to disclose Scope 3 emissions for category 11 “Use of sold products”. - Royalty companies and other franchisors (i.e., companies that grant licenses to other entities to sell or distribute its goods or services in return for payments) are expected to account for emissions that occur from the operation of franchises (i.e., the scope 1 and 2 emissions of franchisees) in Scope 3 category 14: Franchises. Disclosure requirements for partially public question Additional credit will be granted for relevant publicly available evidence covering the following aspect of this question: - Indirect greenhouse gas emissions (Scope 3) figure for either the most recent reported year or the most recent reported year -1, or of at least one individual Scope 3 category with value different from 0. Third-party verification: We expect that data in the most recent reported year or the most recent year -1 has been third-party verified and that relevant documentation is attached showing this verification. Internal audits or verification will not be considered. Please note that it is not necessary that all individual Scope 3 categories are third-party verified to check the relevant checkbox. It is sufficient that the total Scope 3 value, or values for a few relevant categories are third party verified. Data consistency: - If the environmental performance data reported in the questionnaire do not correspond to the publicly reported figures, the corresponding option should be marked and the discrepancy should be explained. This option should not be indicated if the information is not publicly reported at all. - If there is a temporary reduction in coverage due to a corporation action, the corresponding box should be marked and the reduction should be explained. - If it is not possible to report the figures in absolute terms, the data should be reported in relative terms and the corresponding box should be ticked. Please note that information should always be reported in absolute terms if possible, even if it deviates from public reporting.
General data requirements Environmental performance data should cover the activities of the entire company with the same consolidation approach as used in financial reporting and must refer to the financial year (e.g., 01/01 to 31/12 for both financial and environmental data) and be aligned with the figures reported in the Company Information section. Target: We require the absolute target for the most recent reporting year. If your company has a multiple-year and/or relative target, please extrapolate what the target value would have to be for the last financial year to make sure you are progressing well towards achieving the target by the end of the target period. If you report a combined Scope 1+2+3 target, please extrapolate the share equivalent to the absolute Scope 3 emissions for inclusion in the table. Environmental performance data should cover the emissions of suppliers and customers, and of other entities in the upstream and downstream value chain (e.g., franchisees, lessees and lessors, third-party logistics providers, retailers, etc.). In particular, the environmental data of group companies should follow the following rules: - Environmental data of companies that are consolidated proportionally must be considered to the proportion at which they are consolidated financially. - Environmental data of companies that are fully consolidated must be fully considered irrespective of the proportion to which they belong to the group. - Environmental data should refer to the specific company structure of each particular year. There should be no pro-forma backward consolidation of the current company structure. - Environmental data of companies that are sold or no longer consolidated should be excluded from environmental data as of the reporting period in which the company has not been consolidated anymore. - Environmental data of companies that have been bought should only be included as of the reporting period in which the company is consolidated financially for the first time. - Indicators, where a company has not calculated emissions, should be left blank. Zeros should be entered only when the company has calculated its emissions and their emissions are zero. - Where the reported environmental data deviates from these definitions you are asked to explain in what way the data provided differs from the definitions. - If a company publicly reports on long-term but not annual targets, an annual target has to be estimated based on internal target setting or a linear distribution. - The data must be provided in the unit indicated in the question. References This question contains categories of Scope 3 emissions and definitions of the Greenhouse Gas Protocol's Corporate Value Chain (Scope 3) Accounting and Reporting Standard, published in September 2011.

2.4.4 Climate Governance

This question requires publicly available information.

Does the company's board of directors and/or executive management carry oversight and management responsibility of climate-related issues and is this information available publicly?

☒ Yes, the company's board of directors and/or executive management has oversight and management responsibility of climate-related issues. Please indicate where this information is available in public reporting or corporate website.

Board Oversight

☒ Yes, there is a board level committee with oversight of climate-related issues
Please select the committee from the drop-down list
☒ Climate/Sustainability/ESG Committee
☒ Risk Committee
☒ Audit Committee
☒ Other committee with clear oversight on climate-related issues

☒ There is no board level committee with oversight of climate-related issues

☒ Climate issues are on the agenda of the board of directors. Please specify the frequency with which climate-related issues are scheduled agenda items

☒ At least annually
☒ Less frequent than annually, or not specified

Management Responsibility

☒ Yes, there is a management position or committee with responsibility for climate-related issues. Please select the appropriate option from the drop-down list.
☒ Chief Climate/Sustainability/ESG Officer
Executive level climate or sustainability-specific committee

Chief Risk Officer or another C-suite executive with climate responsibility (not CEO)

Another committee with clear responsibility for management of climate-related issues

Below C-suite management position with clear responsibility for management of climate-related issues

There is no management position or committee with responsibility for climate-related issues.

No, the company does not publicly report on board oversight and/or executive management responsibility of climate-related issues.

Not applicable. Please provide explanations in the comment box below.

Info Text:
Question Rationale
The purpose of this question is to assess whether a company’s board of directors and management carry direct responsibility for the oversight and management of climate risks and opportunities. This information helps investors and other stakeholders understand whether climate-related issues receive sufficient attention at the highest levels of governance. This can be indicated by public disclosure of board oversight and management responsibility assigned to certain roles or committees, as well as the frequency of discussions on climate issues. This question is aligned with TCFD which recommends organizations disclose information on board’s oversight of climate-related issues as well management’s role in assessing and managing climate-related issues.

Key Definitions
Board-level committee with oversight: Assigned committee, formed of board members only, with responsibility for overseeing climate-related issues. Management position: Highest ranking individual with dedicated management responsibility for assessing and managing climate-related issues. Management-level committee: A management-level committee responsible for assessing and managing climate-related issues. Data Requirements
Board Oversight: Board oversight refers to a board-level committee responsible for overseeing climate-related issues. Evidence that the committee oversees climate-related issues should be available in the relevant section in TCFD, CDP or other reports. Please select the correct option from the drop-down list. If the board committee is different from a climate or sustainability-specific committee, the climate responsibility needs to be clearly described within public reporting. In order to accept the committee as a board-level committee, all members must be part of the board. If the committee is made up of both board members and management, please record this committee in the "Management Responsibility" section of the question. For two-tier boards, the board-level committee must be formed of members of the supervisory board. Management responsibility: Management responsibility refers to the highest level of management with dedicated responsibility for managing climate-related issues. This can either be an individual or a management-level committee. The individual or committee should not be part of the board of directors. Please select the correct option from the drop-down list. If you have both a Chief Climate/Sustainability/ESG Officer and a Chief Risk Officer who manage climate-related risks, please select Chief Climate/Sustainability/ESG Officer. For two-tier boards, management responsibility can be at the management board level. This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications) or corporate website.

2.4.5 TCFD Disclosure
This question requires publicly available information.

Does the company apply the TCFD framework in the management of climate-related risks and opportunities and is it available publicly?

Yes, the company integrates the TCFD framework or are in the process of integrating it and publicly address the following requirements: Please indicate where this information is available in public reporting or corporate website.

Governance

a) Describe the board’s oversight of climate related risks and opportunities.

b) Describe management’s role in assessing and managing climate-related risks and opportunities.

Strategy
a) Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.

b) Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.

c) Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.

Risk Management

a) Describe the organization's processes for identifying and assessing climate-related risks.

b) Describe the organization's processes for managing climate-related risks.

c) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.

Metrics & Targets

a) Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.

b) Disclose Scope 1, Scope 2, and if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.

c) Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.

The company publicly commits to integrate the TCFD framework, but it does not yet report on any of the requirements. Please indicate the timeframe when you plan to disclose the requirements:

- 2024
- 2025 or later

No, the company does not apply the TCFD framework in its risk management. Please explain the reason.

Not applicable. Please provide explanations in the comment box below.

Info Text:

Question Rationale This question focuses on whether a company applies the TCFD framework in the management of climate-related risks and opportunities. Demand for climate-related disclosure from investors has increased significantly since the release of the TCFD recommendations in 2017. In addition, public sector leaders have also noted the importance of transparency on climate-related issues within financial markets. Climate-related risk is increasingly the subject of new reporting requirements, such as the European Non-financial Reporting Directive 2014/95/EU, which embeds regulatory guidance based on the TCFD recommendations. Many national governments and public sector organizations formally support the TCFD and some have started to issue regulations making TCFD disclosure mandatory. Delays in applying the TCFD framework may not only result in not meeting investors’ needs but also in compliance costs. Data Requirements This question requires public evidence. Please indicate where in your public reporting you report information about applying the TCFD framework.

2.4.6 Climate-Related Management Incentives

This question requires publicly available information.

Does your company provide incentives for the management of climate change issues, including the attainment of targets? Please indicate where this information is available in your public reporting or corporate website.

- Yes, we provide details on the climate change-related incentives starting from the highest management level and the information is publicly available.
Who is entitled to benefit from this incentive? Select each option only once

<table>
<thead>
<tr>
<th>Type of incentive</th>
<th>Incentivized KPIs: Please provide a description of the KPI and how it is incentivized</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Chief Executive Officer (CEO)</td>
<td>☐ Monetary Emissions reduction</td>
</tr>
<tr>
<td>☐ Other Named Executive Officers</td>
<td>☐ Recognition Energy reduction</td>
</tr>
<tr>
<td>☐ Business Unit Managers</td>
<td>☐ Other Efficiency</td>
</tr>
<tr>
<td>☐ Employees</td>
<td>☐ Other Purchasing</td>
</tr>
<tr>
<td>☐ Other, please specify</td>
<td>☐ Other Supply chain engagement</td>
</tr>
<tr>
<td>☐ Other, please specify</td>
<td>☐ Other, please specify</td>
</tr>
</tbody>
</table>

| Chief Executive Officer (CEO) | Monetary Emissions reduction |
| Other Named Executive Officers | Recognition Energy reduction |
| Business Unit Managers | Other Efficiency |
| Employees | Other Purchasing |
| Other, please specify | Supply chain engagement |
| Other, please specify | Other, please specify |

| Chief Executive Officer (CEO) | Monetary Emissions reduction |
| Other Named Executive Officers | Recognition Energy reduction |
| Business Unit Managers | Other Efficiency |
| Employees | Other Purchasing |
| Other, please specify | Supply chain engagement |
| Other, please specify | Other, please specify |

No, we do not publicly report on the incentives provided for the management of climate change issues.

Not applicable. Please provide explanations in the comment box below.

Info Text:
Question Rationale This question aims to capture how rewards are associated with the management of climate change issues, including attainment of targets. This ensures that climate-related ambitions and goals are embedded throughout the company and that management is held accountable for the achievement of these goals. Key Definitions Incentives: Please note that incentives can be positive (i.e., giving access to something) or negative (i.e., preventing access to something). Examples of incentive types include: - Monetary: a bonus or some form of financial remuneration. - Recognition (non-monetary): employee award (e.g., employee of the year) or career progression scheme, but not tied directly to any form of financial remuneration. - Other non-monetary rewards: including increased holiday allowances, special assignment, etc. Data Requirements If several types of incentives are used in your company, please select the incentive that is most commonly employed and include the fact that your company also uses other incentives in the comment box. Each employee group should only be selected once. When you select an incentive for a certain employee group, it is not necessary for all employees in this group to be entitled to benefit from this incentive. For example, you can select the category "Business Unit Managers" even if only one manager is entitled to the incentive. Supporting evidence: - This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications, separate fuel efficiency strategy document) or corporate website. - Any response that cannot be verified in the attached public document(s) will not be accepted.
2.4.7 Climate Risk Management

This question requires publicly available information.

Does the company have a climate risk management process and is it available publicly?

☐ Yes, the company has a climate risk management process. Please indicate where this information is available in public reporting or corporate website.

**Climate Risk Management**
- Integrated into multi-disciplinary company-wide risk management processes, i.e. a documented process where climate change risks and opportunities are integrated into the company’s centralized enterprise risk management program covering all types/sources of risks and opportunities
- A specific climate change risk management process, i.e. a documented process which considers climate change risks and opportunities separate from other business risks and opportunities

**Types of climate-related risk included in risk assessment**
- Current Regulation
- Emerging Regulation
- Technology Risk
- Legal Risk
- Market Risk
- Reputational Risk
- Acute Physical Risk
- Chronic Physical Risk

**Value chain stages covered by climate risk assessment**
- The assessment includes our own operations
- The assessment includes our upstream activities
- The assessment includes our downstream activities and/or clients

**Time horizon(s) covered by climate risk assessment**
- Short-term
- Medium-term
- Long-term

☐ No, the company does not publicly report on a climate risk management process.

☐ Not applicable. Please provide explanations in the comment box below.

**Info Text:**

The purpose of this question is to assess whether your company has a climate risk management process – that is, a process for identifying, assessing, and responding to climate-related risks. Although nearly all organizations are affected by climate change-related risks, the most significant effects of climate change are likely to emerge over the medium to longer term, while the precise timing and magnitude of these impacts remain uncertain. Climate risk assessments covering different climate risk types, different value chain stages and time-horizons can be helpful to understand the potential effects of climate change on companies’ businesses, strategies, and financial performance. This question is aligned with the TCFD Risk Management recommendations which include recommended disclosures on the organization’s processes for identifying and assessing climate-related risks, and on how processes for identifying, assessing, and managing climate-related risks are integrated into the organization’s overall risk management. This question is also aligned with the European Non-financial Reporting Directive 2014/95/EU, which demands that when reporting on their climate-related risks and opportunities, companies consider their whole value chain. Risks of negative impacts on an organization and risks of negative impacts on the climate may arise from companies’ own operations and may also occur throughout the value chain, both upstream in the supply chain and downstream. Key Definitions Risk Assessment: Systematic process for an organization to evaluate potential risks that may impact its assets and operations. (TCFD (2017), Recommendations of the Task Force on Climate-related Financial Disclosures) Physical risks: Physical risks resulting from climate...
change can be event driven (acute) or longer-term shifts (chronic) in climate patterns. Physical risks may have financial implications for organizations, such as direct damage to assets and indirect impacts from supply chain disruption. Organizations’ financial performance may also be affected by changes in water availability, sourcing, and quality; food security; and extreme temperature changes affecting organizations’ premises, operations, supply chain, transport needs, and employee safety. - Acute physical risks refer to those that are event-driven, including increased severity of extreme weather events, such as cyclones, hurricanes, or floods. - Chronic physical risks refer to longer-term shifts in climate patterns (e.g., sustained higher temperatures) that may cause sea level rise or chronic heat waves. TCFD (2017) https://www.tcfdhub.org/Downloads/pdfs/E06%20-%20Climate%20related%20risks%20and%20opportunities.pdf Transition risks: Transitioning to a lower-carbon economy may entail extensive policy, legal, technology, and market changes to address mitigation and adaptation requirements related to climate change. Depending on the nature, speed, and focus of these changes, transition risks may pose varying levels of financial and reputational risk to organizations. Transition risks can be divided into four categories: policy and regulatory risks, technological risks, market risks, and reputational risks. - Policy, regulation and legal risks include implementing carbon-pricing mechanisms to reduce GHG emissions, shifting energy use toward lower-emission sources, and adopting energy-efficiency solutions. The risk associated and financial impact of policy changes depend on the nature and timing of the policy change. Another important risk is litigation risk, which can occur as a result of litigation by for example property owners, municipalities, states, insurers, shareholders, and public interest organizations. - Current regulations include current laws and regulation related to carbon pricing mechanisms, emissions reporting, existing products and services, the supervision of climate risks in the financial sector (Financial services only) - Emerging regulations include emerging laws and regulation related to carbon pricing mechanisms, emissions reporting, existing products and services, the supervision of climate risks in the financial sector (Financial services only) - Technological risks result from technological improvements or innovations that support the transition to a lower-carbon, energy-efficient economy. For example, the development and use of emerging technologies such as renewable energy, battery storage, energy efficiency, and carbon capture and storage will affect the competitiveness of certain organizations, their production and distribution costs, and ultimately the demand for their products and services from end-users. - Market risks can impact companies in various ways. One of the major ways is through shifts in supply and demand for certain commodities, products, and services. - Reputational risks may arise from changing customer or community perceptions of an organization’s contribution to or detraction from the transition to a lower-carbon economy. TCFD (2017), Technical Supplement: The Use of Scenario Analysis in Disclosure of Climate-related Risks and Opportunities) Value Chain: Terminology used to describe the upstream and downstream life cycle of a product, process, or service, including material sourcing, production, consumption, and disposal/recycling. - Upstream activities include operations that relate to the initial stages of producing a good or service, e.g., material sourcing, material processing, and supplier activities. - Own operations include operations related to the direct stages of producing a good or service, such as manufacturing or processing the materials into a finished product. - Downstream activities include operations that relate to processing the materials into a finished product, delivering it to the end user, and the customer use phase (e.g., transportation, distribution and consumption). (TCFD (2017), Technical Supplement: The Use of Scenario Analysis in Disclosure of Climate-related Risks and Opportunities) Time Horizon: Terminology used to describe what your organisation considers to be short-, medium- and long-term horizons (from year to year) considering the expected lifetime of the assets or activities. Data Requirements For the first part of the question, please select the option that best describes the risk management procedures with regard to climate change risks and opportunities. If you have more than one climate risk management process in place in your organization, please select the one that is most commonly employed. Please include in your response which types of physical and transition risks are considered in your risk assessment, along with the value chain stages covered and the time horizons considered. Value chain stages considered may differ depending on which types of physical and transition risks are considered. Please select all the value stages considered and time horizons included if they were used to assess at least one of the physical or transition risk types selected. Time horizons must be available for at least one of the physical or transition risk types selected. Supporting evidence: - The document(s) you attached will be used to verify your response. - The supporting documents must be available in the public domain. - Any response that cannot be verified in the attached document(s) will not be accepted References TCFD (2017), Technical Supplement: The Use of Scenario Analysis in Disclosure of Climate-related Risks and Opportunities https://www.fsb-tcfd.org/publications/final-technical-supplement/ CDP (2017), CDP Technical Note on Scenario Analysis – Conducting and disclosing scenario analysis EU, Technical Expert Group (TEG) (2020) Technical Annex on technical screening criteria for economic activities that can make a substantial contribution to climate change mitigation or adaptation. https://finance.ec.europa.eu/sustainable-finance/tools-and-standards/eu-taxonomy-sustainable-activities_en European Commission, Guidelines on reporting
2.4.8 Financial Risks of Climate Change

Additional credit may be granted for publicly available evidence.

Have you identified any climate change risks (current or future) that have potential to generate a substantive change in your business operations, revenue or expenditures?

☒ Yes, we have identified climate change-related risks with potential impact. Please estimate the financial impact for the most significant risk from each category and provide supporting evidence:

Risks driven by changes in regulation:
Currency: 
☐ Information is available publicly for the description and estimated financial implications of the risk 
☐ Brief description of the most significant risk and methods used to manage this risk:
☐ Estimated financial implications of the risk before taking action:
Average estimated time frame (in number of years) for financial implications of this risk:
☐ Estimated costs of these actions:

Risks driven by change in physical climate parameters or other climate-change related developments
Currency:
☐ Information is available publicly for the description and estimated financial implications of the risk 
☐ Brief description of the most significant risk and methods used to manage this risk:
☐ Estimated financial implication of the risk before taking action:
Average estimated time frame (in number of years) for financial implications of the risk:
☐ Estimated costs of these actions:

☒ We have conducted an analysis of our climate change risk, but our company is not exposed to climate change risks that have the potential to generate a substantive change in business operations, revenue, or expenditure.

☒ We have not conducted an analysis related to climate change risks.

☒ Not applicable. Please provide explanations in the comment box below.

☒ Not known

Info Text:
Question Rationale With this question we aim to find out if companies have identified the risks where there is the potential for substantive changes in business operations, revenue or expenditure to arise. Key Definitions Climate change risks: can include, but are not limited to: - Currently being experienced or expected to arise in the future - Already managed and therefore not expected to generate negative residual impacts (e.g., because of an insurance policy) - Newly identified - Risks which cannot be managed - Well understood or with high levels of uncertainty with regard to the likelihood of the risk materializing and the extent to which
it will impact the business Regulatory risks: arise from current and/or expected city, state, regional, national
or global governmental policy related to climate change. Risks include, but are not limited to, the imposition
of emissions limits, energy efficiency standards and carbon trading schemes. Physical risks: may arise from
dramatic extreme weather events or subtle changes in weather patterns. Other climate-related risks: include,
but are not limited to: reputation, changing consumer behavior, induced changes in human and cultural
environments, fluctuating socio-economic conditions and increasing humanitarian demands. Under financial
implications: you are asked to provide quantitative estimates of the inherent financial impacts of the risks
before taking into consideration any controls you may have in place to mitigate the impacts. An example
would be the cost of destruction of facilities from extreme weather before taking into consideration how
much insurance coverage you have. It is acknowledged that these will be estimates. The methods: you are
using or plan to use to manage the risk could include diversification of product/service offering, research
and development in new product lines or lobbying of decision makers. In all cases please identify how this
action has affected (or is expected to affect) the likelihood and/or magnitude of the risk (i.e., the residual
risk) and over what time frame the risk is expected to or has been reduced. The costs associated: with the
management actions you have described can be annual or capital costs. Where there is no additional cost
for action, please explicitly state this is the case. Where the cost is integrated into existing budgets, please
provide some estimate of the scale of those costs. Time frame: the time frame refers to the time when you
expect the risks are likely to materialize. It is acknowledged that risks further into the future are likely to have
a higher degree of uncertainty associated with them. For companies submitting to CDP: please use the average
between the two numbers of the time frame range. E.g., if the estimated time frame for financial implications of
this risk is between 0 and 3, please disclose “1.5 years” ((0+3)/2 = 1.5) in the estimated time frame field. Data
Requirements Please describe and provide figures concerning the most significant risk from each category (i.e.,
the risk which has the most potential to generate a substantive change in your business operations, revenue
or expenditure). Please provide quantification of climate change risks for those parts of the business where
such analysis has been conducted. If this assessment does not cover all business operations, please provide
data for those measured areas only and provide an explanation of which areas are covered in the comment
box. Disclosure Requirements Disclosure requirements for partially public question: Additional credit will be
granted for relevant publicly available evidence for the following: - Description of risks driven by changes in
regulation - Description of risks driven by changes in physical climate parameters or other climate-change
related developments - Estimated financial implication of the risk(s) Supporting evidence: - The document(s)
you attach will be used to verify the qualitative part of your response. If a question text field is available,
a comprehensive answer in that field can be accepted instead of a supporting document. Any qualitative
response that cannot be verified in the attached document(s) or via the information provided in the related
question text field (if available) will not be accepted. - Quantitative figures provided in the response do not need
supporting evidence. You may still provide a reference using the reference clip. This could include examples
of the underlying calculations or approaches to data aggregation used to compile the provided quantitative
information.

2.4.9 Financial Opportunities Arising from Climate Change

Additional credit may be granted for publicly available evidence.

Have you identified any climate change-related opportunities (current or future) that have the potential to
generate a substantive positive change in your business operations, revenue, expenditure (i.e. opportunities
driven by changes in regulation, physical, or other climate change-related developments)?

Yes, we have identified climate change-related opportunities. Please briefly describe the most significant
opportunity resulting from climate change on your business operations, revenue growth, or expenditures
and provide supporting evidence:

Currency:

- Information is available publicly for the description and estimated financial implications of the
  opportunity:

- Please provide description below:

- Please estimate the annual financial positive implications of this opportunity:
Estimated time frame (in number of years) for positive financial implications of this opportunity:

Please estimate the current annual costs associated with developing this opportunity:

We do not consider climate change related opportunities (current or future) to be relevant to our business, please explain why:

We have not conducted an analysis of our climate change opportunities.

Not applicable. Please provide explanations in the comment box below.

Not known

Info Text:
Question Rationale When a company faces risks associated with climate change (reported in previous question) it is possible that they may also experience opportunities. Both arise from changes in the operating environment of a company and as some changes can represent additional costs, others (or even the same changes) represent opportunities to exploit new markets or products. This question aims to find out if companies have identified climate change related opportunities that have the potential to generate positive change in their business operations, revenue generation and expenditure. Key Definitions Climate Change Opportunities: can include, but are not limited to: - Currently being experienced or expected to arise in the future - Being managed or newly identified - Well understood or with high levels of uncertainty with regard to the likelihood of the opportunity materializing and the extent to which it will impact the business Opportunities can be related to any of the following categories: Regulation: on climate change related issues may present opportunities for your organization if it is better suited than its competitors to meet those regulations, or more able to help others to do so. Possible scenarios would include a company whose products already meet anticipated standards designed to curb emissions, those whose products will enable its customers to meet mandatory requirements or those companies who provide services assisting others in meeting regulatory requirements. Regulation may also create new markets such as emission trading markets leading to new opportunities. Physical changes: related to climate change may present opportunities in a variety of ways. Reduced sea ice may allow access to new areas for vessels. Changing temperatures and rainfall may extend growing seasons for farmers. Alternatively, your organization may have goods and services that enable others to adapt to physical changes. Other climate-related opportunities: include those posed by changes in consumer attitude or improved standing due to your organization’s stance or action on climate change. The financial implications: of the opportunity should be expressed quantitatively. It is acknowledged that these will be estimates and where possible the assumptions made in arriving at a financial impact figure should be stated in the comment box. The costs associated: with developing the opportunities refer to the cost arising from the actions needed to exploit the opportunity and maximize its potential realization. Where there is no cost for action, please explicitly state this in the comment box, and in this case insert “0” to the text box provided. Time frame: – the timeframe refers to the time when you expect the opportunities to materialize. It is acknowledged that opportunities further into the future are likely to have a higher degree of uncertainty associated with them. For companies submitting to CDP: please use the average between the two numbers of the time frame range. E.g., if the estimated time frame for positive financial implications of this opportunity is between 4 and 8, please disclose “6 years” ((4+8)/2 = 6) in the estimated time frame field. Data Requirements Please describe and provide figures concerning the most significant opportunity identified. Disclosure Requirements Please describe and provide figures concerning the most significant opportunity identified. Disclosure requirements for partially public question: Additional credit will be granted for relevant publicly available evidence for the following: - Description of relevant financial opportunities arising from climate change - Estimated financial implication and estimated cost Supporting evidence: - The document(s) you attached will be used to verify the qualitative part of your response. If a question text field is available, a comprehensive answer in that field can be accepted instead of a supporting document. Any qualitative response that cannot be verified in the attached document(s) or via the information provided in the related question text field (if available) will not be accepted. - Quantitative figures provided in the response do not need supporting evidence. You may still provide a reference using the reference clip. This
2.4.10 Climate-Related Scenario Analysis

This question requires publicly available information.

Does the company conduct climate-related scenario analysis and is this information available publicly?

- Yes, the company conducts climate-related scenario analysis. Please indicate where this information is available in public reporting or corporate website.
- We use qualitative climate-related scenario analysis
- We use quantitative climate-related scenario analysis
- We use qualitative and quantitative climate-related scenario analysis

Please select any climate-related scenarios your organization has used in their climate-related scenario analysis.

<table>
<thead>
<tr>
<th>Scenario Type</th>
<th>2°C or below 2°C</th>
<th>Above 2°C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transition Scenario</td>
<td>❑ IEA NZE 2050 ❑ IEA 2DS ❑ IEA B2DS ❑ IEA 450 ❑ IEA SDS ❑ IEA APS or Nationally determined contributions (NDCs) ❑ Greenpeace ❑ DDP ❑ IRENA ❑ BNEF NEO ❑ NGFS (2°C and below scenarios)</td>
<td>❑ IEA STEPS (previously IEA NPS) ❑ IEA CPS ❑ NGFS (Above 2°C scenarios)</td>
</tr>
<tr>
<td>Physical Scenario</td>
<td>❑ RCP 1.9 (or SSP1 1.9) ❑ RCP 2.6 (or SSP1 2.6)</td>
<td>❑ RCP 3.4 (or SSP4 3.4) ❑ RCP 4.5 (or SSP2 4.5) ❑ RCP 6.0 (or SSP4 6.0) ❑ RCP 7.0 (or SSP3 7.0) ❑ RCP 8.5 (or SSP5 8.5)</td>
</tr>
</tbody>
</table>

- Our analysis covers at least one 2°C or below 2°C scenario that is not listed in the table, please provide further details.

- Our analysis covers at least one above 2°C scenario that is not listed in the table, please provide further details.

- No, the company does not publicly report that it conducts climate-related scenario analysis.
- Not applicable. Please provide explanations in the comment box below.
Info Text:
Question Rationale: Companies need to consider a broad range of assumptions, uncertainties, and potential future states to understand the potential effects of climate change on their businesses, strategies, and financial performance across different time horizons and different temperature pathways. One way to do this is through conducting climate-related scenario analysis. This question is aligned with the TCFD recommendations, which include a recommended disclosure on the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario. Key Definitions: Scenario Analysis: Process for identifying and assessing a potential range of outcomes of future events under conditions of uncertainty. In the case of climate change, for example, scenarios allow an organization to explore and develop an understanding of how the physical and transition risks of climate change may impact its businesses, strategies, and financial performance over time. Climate-related scenario analysis should consider climate risks that are material to companies' operations and value chain. TCFD (2017), Recommendations of the Task Force on Climate-related Financial Disclosures) Qualitative scenario analysis explores relationships and trends for which little or no numerical data is available. This is generally a high-level, narrative approach to scenario analysis, suitable for organizations that are familiarizing themselves with the process. For example, relying on industry trends and applying them to a specific organization or business activity, or undertaking qualitative research into a specific trend. Quantitative scenario analysis assesses measurable trends and relationships using quantitative models, data sets and other analytical techniques to illustrate potential pathways or outcomes. This is a more detailed approach to conducting scenario analysis. External, third-party scenarios or data sets can be used, or companies can develop in-house modeling capabilities considering specific assumptions or parameters. 2°C or below 2°C, and above 2°C: Under the 2015 Paris Agreement, nearly 200 countries agreed to limit global warming to no more than 2 degrees Celsius by 2100, and to aim for a no more than 1.5 degrees Celsius increase. The 2-degree scenario is widely seen as the global community's accepted limitation of temperature growth to avoid significant and potentially catastrophic changes to the planet. 2-degree or below scenarios can also be referred to as “Paris Aligned”. Scenarios for above 2°C warming show a potential situation where this agreement is not met. https://www.spglobal.com/en/research-insights/articles/what-s-the-deal-with-the-2-degree-scenario IPCC RCP/SSP: The United Nations Intergovernmental Panel on Climate Change (IPCC) produces physical risk scenarios under a variety of warming pathways. Within its sixth-assessment report (AR6), new scenarios were developed called “Shared Socio-Economic Pathways” (SSPs), which aim to replace Representative Concentration Pathways (RCPs) although RCPs still form the basis of SSPs and are widely used. https://www.ipcc.ch/assessment-report/ar6/ International Energy Agency (IEA): The IEA produces various energy and transition risk-related scenarios, details of which can be used for transition risk scenario analysis. https://www.iea.org/reports/global-energy-and-climate-model Other listed transition scenarios: - Network for Greening the Financial System (NGFS): https://www.ngfs.net/ngfs-scenarios-portal/ - Greenpeace: https://www.greenpeace.org/usa/wp-content/uploads/legacy/Global/usa/report/2009/4/energy-r-revolution-a-sustain.pdf - Deep Decarbonization Pathways (DDP): https://ddpinitiative.org/display/ - International Renewable Energy Agency (IRENA): https://www.irena.org/publications/2020/Sep/Scenarios-for-the-Energy-Transition-Global-experience-and-best-practices - BloombergNEF New Energy Outlook (BNEF NEO): https://about.bnef.com/new-energy-outlook/ Data Requirements: Please select all the climate scenarios you have used to assess physical and transition risks. In line with the TCFD recommended disclosure, at least two scenarios are required for full scoring. One of these scenarios should be a 2 °C or lower scenario, the other should be an above 2 °C scenario. If your company conducts climate scenario analysis with scenarios that are not listed in the question table, please describe the following elements in the text box below the selected option. Please note that this information should be available in the public domain. - A description of the scenarios used, and whether the scenarios used are 2°C or lower scenarios or above 2°C scenarios. Please note: for companies which use NGFS scenarios for physical risks as well as transition, please select the “Our analysis covers at least one [...] scenario that is not listed in the table” option depending on the temperature used. Supporting evidence: - The document(s) you attached will be used to verify your response. - The supporting documents must be available in the public domain. - Any response that cannot be verified in the attached document(s) will not be accepted. References: TCFD (2017), Technical Supplement: The Use of Scenario Analysis in Disclosure of Climate-related Risks and Opportunities https://www.fsbtcfdf.org/publications/final-technical-supplement CD (2017), CDP Technical Note on Scenario Analysis – Conducting and disclosing scenario analysis European Commission, Guidelines on reporting climate-related information https://ec.europa.eu/finance/docs/policy/190618-climate-related-information-reporting-guidelines_en.pdf

2.4.11 Physical Climate Risk Adaptation
Additional credit may be granted for publicly available evidence.

Based on your climate risk assessment, has your company set up a plan to adapt to the identified physical climate risks? Please provide supporting evidence and indicate where this is available in the public domain.

☐ Yes, we have a **context-specific plan** to adapt to physical climate risks in existing and/or new operations. Please provide supporting evidence and indicate if this is available in the public domain.

☐ We publicly report on our context-specific plan to adapt to physical risks

☐ The risk assessment and plan to adapt to physical climate risks cover the following share of our **existing operations** (Percentage of total revenues):


The plan includes a target to implement relevant adaptation measures within the following timeline for existing operations:

☐ Less than 5 years

☐ 5 to 10 years

☐ More than 10 years

☐ The risk assessment and plan to adapt to physical climate risks cover the following share of our **new operations** (Percentage of new operations):


☐ We have no new asset planned.

☐ Yes, we have an **overall plan** to adapt to potential physical climate risks. Please provide supporting evidence and indicate if this is available in the public domain.

☐ We publicly report on overall plan to adapt to physical risks

The plan includes a target to implement relevant adaptation measures within the following timeline:

☐ Less than 5 years

☐ 5 to 10 years

☐ More than 10 years

☐ No, we have no existing plan to adapt to physical climate risks.

☐ Not applicable. We have performed a climate risk assessment for physical risks, but do not consider our company’s assets and operations to be exposed to any material physical risks. Please provide a detailed explanation in the comments box below.

☐ Not known

**Info Text:**

The climate risk assessment of physical and transition risks builds the basis for companies to plan adaptation and mitigation measures in response to those risks. Adaptation and mitigation measures are ideally planned so that context-specific factors are considered for all relevant assets and operations, since climate-related hazards are location and context-specific. This question focuses specifically on adaptation measures for physical risks. Climate change adaptation can be understood as anticipating the adverse effects of climate change and taking appropriate action to prevent or minimize the damage it can cause. It includes business opportunities such as new technologies to use scarce water resources more efficiently, or the building of new flood defenses. Climate change mitigation and adaptation is a central part of the EU taxonomy for sustainable activities. The information on risk assessment of physical impacts is required for evaluating compliance with the EU Taxonomy Do No Significant Harm criteria on climate change adaptation. The EU taxonomy demands that an activity integrates physical and non-physical measures aimed at reducing all material risks that have been identified through a climate risk assessment. For existing activities, the implementation of those physical and non-physical measures may be phased and executed over a period of time of up to five years. For new activities, implementation of these measures must be met at the time of design and construction. (EU Technical Expert Group, Taxonomy Report, Technical Annex). Key Definitions Adaptation: Anticipating the adverse effects of climate change and taking appropriate action to prevent or minimize the damage they can cause or taking advantage of opportunities that may arise. Context-specific: Adaptation responds to physical climate risks that are mostly location and context-specific. Due to this nature, organizations can best assess climate-related risks and mitigate them based on a context-specific
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BNK Test Company

plan. For example, there are in principle several engineering and non-engineering options available to a coastal city to respond to the risk resulting from increased sea level. Responses will vary according to where the city is located, its size, the institutional and financial capacity of the city administration to deal with climate risk, the technical and engineering expertise available, the priority of the city, the perception of the citizens, and other factors. The adaptation responses will benefit the city that adopts them and possibly the systems that depend on or interact with the city. A context-specific plan integrates physical and non-physical measures aimed at reducing - to the extent possible and on a best-effort basis - all material risks that have been identified through a climate risk assessment (EU Technical Expert Group, Taxonomy Report, Technical Annex) New operations: refers to assets planned, under construction or put in use after the current reporting cycle (i.e., after 2021 for the 2022 CSA). Data Requirements Additional credit will be granted for public disclosure of a context-specific or an overall plan to adapt to physical climate risks. If your company has performed a climate risk assessment for physical risks and no material physical risks were identified, please select “Not applicable” to this question and provide a detailed explanation. References EU, Technical Expert Group (TEG)(2020) Technical Annex on technical screening criteria for economic activities that can make a substantial contribution to climate change mitigation or adaptation. https://ec.europa.eu/info/sites/info/files/business_economy_euro/banking_and_finance/documents/200309-sustainable-finance-teg-final-report-taxonomy-annexes_en.pdf European Commission, Guidelines on reporting climate-related information https://ec.europa.eu/finance/docs/policy/190618-climate-related-information-reporting-guidelines_en.pdf

2.4.12 Emissions Reduction Targets

This question requires publicly available information.

Does your company have any corporate-level emissions reduction targets publicly available? If your company also answers the question Net-Zero Commitment, please do not provide your Net-Zero target in this question, but provide details of your related near-term emissions reduction target.

☐ Yes, we have a company-wide absolute emissions target and/or an emissions intensity target publicly available that covers Scope 1, Scope 2, and/or Scope 3 emissions. Please provide details in the table below.

Target Type and Metric

☐ Absolute targets

☐ Intensity targets

Intensity Metric

☐ Metric tons CO2e per square meter
☐ Metric tons CO2e per metric ton of aluminum
☐ Metric tons CO2e per metric ton of steel
☐ Metric tons CO2e per metric ton of cement
☐ Metric tons CO2e per metric ton of cardboard
☐ Grams CO2e per kilometer
☐ Metric tons CO2e per unit revenue
☐ Metric tons CO2e per unit FTE employee
☐ Metric tons CO2e per unit hour worked
☐ Metric tons CO2e per metric ton of product
☐ Metric tons of CO2e per liter of product
☐ Metric tons CO2e per unit of production
☐ Metric tons CO2e per unit of service provided
☐ Metric tons CO2e per square foot
☐ Metric tons CO2e per kilometer
☐ Metric tons CO2e per passenger kilometer
<table>
<thead>
<tr>
<th>Scope covered by the target</th>
<th>Target Timeframe</th>
<th>Baseline year emissions covered and as a % of total base year emissions</th>
<th>% reduction target from base year</th>
<th>Is this target validated by the Science-based Targets Initiative?</th>
</tr>
</thead>
<tbody>
<tr>
<td>❍ Scope 1 + 2 combined</td>
<td>Base Year</td>
<td>Base year emissions</td>
<td>Percentage of total base year emissions</td>
<td>❍ Yes</td>
</tr>
<tr>
<td>❍ Scope 1 + 2 + 3 combined</td>
<td>Target Year</td>
<td></td>
<td></td>
<td>❍ No, but we have publicly committed to seek validation to the target by the SBTi</td>
</tr>
<tr>
<td>❍ Not known</td>
<td></td>
<td></td>
<td></td>
<td>❍ No, but we consider the target to be science-based</td>
</tr>
<tr>
<td>❍ Scope 1</td>
<td>Base Year</td>
<td>Base year emissions</td>
<td>Percentage of total base year emissions</td>
<td>❍ Yes</td>
</tr>
<tr>
<td></td>
<td>Target Year</td>
<td></td>
<td></td>
<td>❍ No, but we have publicly committed to seek validation to the target by the SBTi</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>❍ No, but we consider the target to be science-based</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>❍ No, the target is not science-based</td>
</tr>
<tr>
<td>Scope covered by the target</td>
<td>Target Timeframe</td>
<td>Baseline year emissions covered and as a % of total base year emissions</td>
<td>% reduction target from base year</td>
<td>Is this target validated by the Science-based Targets Initiative?</td>
</tr>
<tr>
<td>-----------------------------</td>
<td>------------------</td>
<td>-------------------------------------------------</td>
<td>---------------------------------</td>
<td>------------------------------------------------------</td>
</tr>
<tr>
<td>❏ Scope 2</td>
<td>Base Year</td>
<td>Base year emissions</td>
<td>Percentage of total base year emissions</td>
<td>❏ Yes</td>
</tr>
<tr>
<td></td>
<td>Target Year</td>
<td></td>
<td></td>
<td>❏ No, but we have publicly committed to seek validation to the target by the SBTi</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>❏ No, but we consider the target to be science-based</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>❏ No, the target is not science-based</td>
</tr>
<tr>
<td>❏ Scope 3</td>
<td>Base Year</td>
<td>Base year emissions</td>
<td>Percentage of total base year emissions</td>
<td>❏ Yes</td>
</tr>
<tr>
<td></td>
<td>Target Year</td>
<td></td>
<td></td>
<td>❏ No, but we have publicly committed to seek validation to the target by the SBTi</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>❏ No, but we consider the target to be science-based</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>❏ No, the target is not science-based</td>
</tr>
</tbody>
</table>

❖ No, we do not have any company-wide absolute emissions target or emissions intensity target publicly available.
❖ Not applicable. Please provide explanations in the comment box below.

**Info Text:**

Question Rationale Most industries are likely to be impacted by climate change, albeit to a varying degree. Consequently, they need to design strategies which are adapted to the size of the challenge for their industry. Whilst the majority of the companies focus on risks associated with the changing climate, some seek to identify and seize the business opportunities linked to these global challenges. Setting emission reduction targets enables companies to adopt a systematic and disciplined approach towards reducing their emissions. With this question, we aim to find out if a company has set absolute or relative corporate targets to reduce greenhouse gas emissions. Key Definitions Absolute target: a target that describes a reduction in actual emissions in a future year when compared to a base year. Intensity target: a target that describes a future reduction in emissions that have been normalized to a business metric when compared to normalized emissions in a base year. Intensity measure: Grams CO2e or Metric tons CO2e per kilometer, per USD($) value-added, square meter, per unit revenue, per unit FTE employee, per unit hour worked, per unit of production, per unit of service provided etc. Science-based targets: “Targets are considered ‘science-based’ if they are in line with what the latest climate science deems necessary to meet the goals of the Paris Agreement – limiting global warming to well-below 2°C above pre-industrial levels and pursuing efforts to limit warming to 1.5°C.” Source: Science-based targets Initiative Data Requirements - We expect companies to set absolute or intensity emission targets. If your company has both absolute and intensity targets, please prioritize your absolute target. - If you provide the intensity target in this question, please select the intensity measure used (metric). Scopes
covered by the target: Scopes covered by the company’s emissions reduction target and reduction of emissions
to be achieved in the target year compared to the base year. - If you report a target which covers Scope 1+2
combined, please complete the first row and tick “Scope 1+2 combined”. You can also add a separate Scope
3 target in the last row. - If you report a target which covers Scope 1+3 combined, please complete the first
row and tick “Scope 1+3 combined”. You can also add a separate Scope 2 target. - If you report a target which
covers Scope 1+2+3 combined, please complete the first row, tick “Scope 1+2+3 combined” and leave the
last 3 rows blank. - If you report a target which covers Scope 1, 2 and 3 separately, please complete the Scope
1, Scope 2 and Scope 3 rows. - If you report a target which only covers Scope 3, please complete the last row
only. - If you report both combined and individual targets for all 3 scopes, please only provide individual targets
in the table. Supporting evidence: - The document(s) you attached will be used to verify your response. - The
supporting documents must be available in the public domain. - Any response that cannot be verified in the
attached document(s) will not be accepted Industry-Specific Guidance: Financial Institutions (BNK/FBN/INS)
- We expect short-term emission targets to focus on operational emissions. - Category 15 Financed emissions
targets should be accounted for under the Net-Zero Targets for Financed Emissions under the Decarbonization
Strategy Criteria. References https://sciencebasedtargets.org/

2.4.13 Internal Carbon Pricing

Please indicate if your company uses an internal price of carbon. If yes, please specify your company’s
objective to implement an internal carbon price and provide details of how this is being used within the
organization and what the internal carbon price is. In case your company uses more than one type of internal
carbon prices, please report the price that has the greatest impact on your organization (i.e. price * quantity
of emissions generated).

❍ Yes, we use an internal price of carbon. Please specify your company’s objective to implement an internal
carbon price and fill out the table below. Please attach supporting evidence.

- Navigate GHG regulations
- Stakeholder expectations
- Change internal behavior
- Drive energy efficiency
- Drive low-carbon investments
- Stress test investments
- Identify and seize low-carbon opportunities
- Supplier engagement
- Other, please specify:

<table>
<thead>
<tr>
<th>GHG Scope</th>
<th>Type of internal carbon price</th>
<th>Application</th>
<th>Price (per metric tonne CO2e)</th>
<th>Price setting approach</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scope 1</td>
<td>Shadow price</td>
<td>Company-wide (with local variations accepted)</td>
<td>Currency:</td>
<td></td>
</tr>
<tr>
<td>Scope 2</td>
<td>Internal fee</td>
<td>Selected business units</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Scope 3</td>
<td>Internal trading</td>
<td>Selected regions</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Implicit price</td>
<td>Ad-hoc</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Offsets</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Other, please specify:</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

❏ No, we do not use an internal price of carbon.
Info Text:
Question Rationale Many major publicly-traded companies have integrated an “internal carbon price” as a core element in their ongoing business strategies. Such carbon pricing has become a standard operating practice in business planning as a means of testing strategic and investment assumptions’ vulnerability to ever-stronger climate-related regulation and the broader emergence (explicitly or implicitly) of a cost of carbon. Through this question, we aim to assess how robustly companies are using this approach to anticipate an eventual regulatory approach in some form to address climate change. Key Definitions Internal carbon price: Internal assumptions of a carbon price as a planning tool to help identify revenue opportunities, risks, and as an incentive to drive maximum energy efficiencies to reduce costs and guide capital investment decisions. Price setting approaches: - External resources: such as price projections from climate-related regulation (e.g., the expected future Emissions Trading Systems (ETS) or carbon tax price and/or implicit carbon price) or the social cost of carbon - Benchmarking against peers: such as by looking at carbon prices set by other companies within its own sector. - Internal consultation: at a price to be material enough to change business decisions and behavior. - Technical analyses of the required measures to achieve the targets on reducing its carbon footprint and the associated investments needed. Type of internal carbon price: - Most companies utilize a shadow price – attaching a hypothetical cost of carbon to each tonne of CO2e – as a tool to reveal hidden risks and opportunities throughout its operations and supply chain and to support strategic decision-making related to future capital investments. - Some companies with emissions reduction or renewable energy targets calculate their “implicit carbon price” by dividing the cost of abatement/procurement by the tonnes of CO2e abated. This calculation helps quantify the capital investments required to meet climate-related targets and is frequently used as a benchmark for implementing a more strategic internal carbon price. - Internal fee mechanisms take this approach a step further by charging responsible business units for their carbon emissions. These programs frequently reinvest the collected revenue back into clean technologies and other activities that help transition the entire company towards lower-carbon operations and investments. Some companies establish an internal trading mechanism – allowing the business units to trade allocated carbon credits. - Some companies utilize the voluntary carbon markets to offset their emissions - internalizing this cost per tonne of CO2e. Data Requirements In case your company uses more than one type of internal carbon price, please report the price that has the greatest impact on your organization (i.e., price * quantity of emissions generated). Price (per metric tonne CO2e): Please report the value of the price per metric tonne you use for your analysis and not the total value of your analysis. Diversified mining companies (MNX) that do not have oil & gas or coal operations may mark “Not applicable” in this question. Supporting evidence: - The document(s) you attached will be used to verify the qualitative part of your response. If a question text field is available, a comprehensive answer in that field can be accepted instead of a supporting document. Any qualitative response that cannot be verified in the attached document(s) or via the information provided in the related question text field (if available) will not be accepted. - Quantitative figures provided in the response do not need supporting evidence. You may still provide a reference using the reference clip. This could include examples of the underlying calculations or approaches to data aggregation used to compile the provided quantitative information. - The supporting documents do not need to be available in the public domain. References Ecofys, the Generation Foundation and CDP (2017), "How to guide to corporate internal carbon pricing – Four dimensions to best practice approaches", Consultation Draft

2.4.14 MSA Climate Strategy

In this section we include a performance score on the Corporate Sustainability Monitoring with the objective to verify the company’s involvement and management of crisis situations that can have a damaging effect on reputation. The evaluation will be filled in by the responsible analyst of your industry. No additional information is required from your company.

Info Text:
Based on a Media and Stakeholder Analysis (MSA), the consistency of a company’s behavior and management of crisis situations is reviewed in line with its stated principles and policies. Results of the MSA range from no impact to high impact - the latter reflecting serious reputational risks with consequences on the company's bottom line (e.g. legal liabilities or high probability of imminent legal liabilities). In addition, the overall quality
of the management response to a situation is assessed, evaluating whether a company has transparently and proactively managed the issue.

2.5 Decarbonization Strategy

As the urgency of the climate emergency grows, the world needs to transition to a low-carbon economy, and the global financial system needs to make drastic measures to cut their fossil fuel financing and set realistic and meaningful net zero commitments. The financial sector must acknowledge and endorse the need for decarbonization. Failure to cut funding to carbon intensive sectors, with high environmental, social, and climate impacts may lead to heightened physical risks, regulatory risks, reputational risks, and stranded asset risks among others.

While financial institutions (FIs) emit low levels of GHGs to run their operations, they finance the emissions of other companies through their loans, investments, and insurance underwriting activities. These ‘financed emissions’ can be up to 700 times higher than direct emissions. Nonetheless, there are already a few approaches being used by FIs as part of their efforts to decarbonize and meet their net-zero investment strategies. A mix of decarbonization policies and engagement, supplemented by financing of climate and green solutions is cited mentioned as potentially most appropriate approach for an emerging (in consultation) Net Zero science-based targets for FIs (by SBTi).

The Decarbonization criteria aims to capture the actions FIs have taken to tackle one of the most material issues for the sector – the impact of their lending on climate and their ability to drive the decarbonization of the real economy needed to stabilize temperatures at 1.5°C above pre-industrial levels. Investors and CSA data users will benefit from insights into financial institutions’ commitments and actions to decarbonize their business models over long-term, intermediate term as well as an insight into current situation related to fossil fuel financing/investment/insurance and provision of fossil fuel specific policies.

2.5.1 Net-Zero Targets for Financed Emissions

This question requires publicly available information.

Has your company set and publicly disclosed a net-zero target and/or intermediate emissions reduction targets for your financed emissions?

- Yes, we have set a net-zero targets and/or intermediate emissions reduction targets.

PART 1: Net-Zero Target

- Yes, we have set a net-zero target for our financed emissions.

<table>
<thead>
<tr>
<th>Target Time Frame</th>
<th>Is your net-zero target validated by the Science-Based Targets initiative?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Base year</td>
<td>Yes</td>
</tr>
<tr>
<td>Target year</td>
<td>Yes, but we have publicly committed to seek validation to the target by SBTi</td>
</tr>
<tr>
<td></td>
<td>Not validated by SBTi, but we have third-party independent verification for our target</td>
</tr>
<tr>
<td></td>
<td>Not validated or verified, but we consider this target to be science-based</td>
</tr>
<tr>
<td></td>
<td>None of the above</td>
</tr>
</tbody>
</table>

- No, we have not set a net-zero target for our financed emissions.

PART 2: Intermediate Emissions Reduction Target/s

- Yes, our company has set an intermediate emissions reduction target/s for our financed emissions. If you have more than one intermediate target, please mark all the relevant methodologies that you have used.
to set them. For Target Time Frame and Validation columns, please use either your SBTi target, or if not available, one of your intermediate targets with the earliest target year.

<table>
<thead>
<tr>
<th>Intermediate target/s use one or more of the following target setting methodologies:</th>
<th>Target/s type/approach description:</th>
<th>Target Time Frame</th>
<th>Is your intermediate target validated by Science-Based Targets initiative?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Science Based Target initiative for Financial Institutions</td>
<td></td>
<td>Base Year Target Year</td>
<td>Yes</td>
</tr>
<tr>
<td>Net-Zero Asset Owner Alliance Target Setting Protocol</td>
<td></td>
<td></td>
<td>No, but we have publicly committed to seek validation to the target by SBTi</td>
</tr>
<tr>
<td>Paris Aligned Investment Initiative Net-Zero Investment Framework</td>
<td></td>
<td></td>
<td>Not validated by SBTi, but we have third-party independent verification for our target</td>
</tr>
<tr>
<td>UNEP FI Guidelines for Climate Target Setting for Banks</td>
<td></td>
<td></td>
<td>Not validated or verified, but we consider this target to be science-based</td>
</tr>
<tr>
<td>We do not use any of the above methodologies for our targets, but use another methodology</td>
<td></td>
<td></td>
<td>None of the above</td>
</tr>
</tbody>
</table>

- No, we do not set an intermediate emissions reduction target for our financed emissions
- We have not set net-zero target and intermediate emissions reduction targets for our financed emissions.
- Not applicable. Please provide an explanation in the comment box below.

**Info Text:**

**Question Rationale:** Financial Institutions’ most material impact on climate is through their investment and lending activities, which is why they are increasingly expected to speed up target setting in these areas. Business strategies related to investment management and lending activities must be urgently reviewed in order to avoid the worst effects of catastrophic climate change and to fund a climate-secure, zero-carbon future. Net-zero commitments in the financial sector are increasing, yet the details of those are key in differentiating a good commitment from greenwashing. Hence, this question assesses and compares the Net-Zero and intermediate emission reduction targets from financed emissions as publicly reported by financial industry companies. According to Net-Zero Tracker, 33 financial services companies (banks, (re-)insurers and asset managers/owners) have issued decarbonization commitments. Many of them do not cover financed emissions, but some do. In terms of Science Based Targets initiative (SBTi) emission reduction targets, to date, more than 70 financial institutions have publicly committed to set emissions reduction targets through the SBTi. An additional 80 institutions in the financial sector reported to CDP in 2019 that they intend to set a science-based target within the next two years. Key Definitions: Scope 3 Financed Emissions: Category of emissions associated with the reporting company’s investments in the reporting year, not currently included in Scope 1 or 2 emissions. These emissions are categorized as a downstream Scope 3 category because of the provision of capital or financing provided by the reporting company, also known as Category 15 Scope 3 emissions. Science Based Targets: “Targets are considered ‘science-based’ if they are in line with what the latest climate science deems necessary to meet the goals of the Paris Agreement – limiting global warming to well-below 2°C above pre-industrial levels and pursuing efforts to limit warming to 1.5°C.” Source: SBTi Science Based Targets initiative (SBTi): defines and promotes best practices in emissions reductions and net-zero targets in line with climate science. It provides technical assistance, expert resources to companies who set science-based targets, and independent assessment and validation of those targets. For signatories
indicating use of the SBTi methodology, it is noted that the Science Based Targets initiative (SBTi) process for target setting is as follows: - Committing to a Science Based Target via a letter of intent (optional) - Developing a target in line with SBTi criteria - Presenting target to SBTi for official validation (within 2 years of committing) - Communicating this validation to stakeholders - Reporting progress against these targets annually Net-Zero commitment/targets: In terms of net-zero targets this question focuses specifically on Scope 3, Category 15 financed emissions, and not on company emissions from operations. The first climate mitigation step for many financial institutions is a high-level commitment to act through an international initiative such as any of the initiatives united under the Glasgow Financial Alliance for Net-Zero (GFANZ), for example the UN convened Net-Zero Asset Owners Alliance. Some of these Alliances have their own net-zero target setting protocols and methodologies, which help financial institutions to develop science-based targets and action plan. Target setting with the SBTi currently can provide specific, shorter-term components of the high-level commitments and build on the financed emissions and scenario analysis. Several financial institutions have publicly committed to seek validation of their net-zero target by SBTi. Target time frame: Financial institutions should reach net-zero by no later than 2050. While earlier target years are encouraged, a more ambitious time frame should not come at the expense of emissions mitigation. Net-Zero target setting protocols vary slightly between target time frame requirements for intermediate targets, with most requiring an intermediate target year of 2030 or earlier. Target Validation or verification: It is best practice to have net-zero and intermediate emission reduction targets validated. Companies can seek validation of targets from SBTi or through a third-party independent verification route, as recommended by some of the Net-Zero Alliances. Net-Zero Asset Owner Alliance Target Setting Protocol: Specifies what actions the Net-Zero Asset Owner Alliance (NZAOA) must undertake to enable a real-economy transition towards a 1.5°C pathway in line with the “no or limited” overshoot scenarios of the IPCC (Intergovernmental Panel on Climate Change). Source: NZAOA Paris Aligned Investment Initiative Net-Zero Investment Framework: First published in August 2020 and is designed to provide a basis on which a broad range of investors can make commitments to achieving Net-Zero emissions and define strategies, measure alignment, and transition portfolios. Source: PAlI UNEP FI Guidelines for Climate Target Setting for Banks: Designed by UNEP FI’s Collective Commitment to Climate Action (CCCA) group of signatories and is designed to provide a basis on which a broad range of investors can make commitments to achieving net-zero emissions and define strategies, measure alignment, and transition portfolios. For signatories to the CCCA, the implementation, monitoring and reporting against these guidelines fits into wider UNEP FI Principles for Responsible Banking governance processes. Source: UNEP-FI Guidelines for Climate Target Setting for Banks. Data Requirements This question requires public evidence. Supporting documentation should provide clear details of the net-zero and intermediate emission reduction targets, such as Base and Target Year in addition to methodologies/protocols used in setting these targets. It should be clear to a reader whether it is firm-wide or covers only some of your business activities. For PART 2, in case your company chooses neither of the methodologies listed, please select “We do not use any of the above methodologies for our targets but use another methodology”, and further specify what this methodology entails in the available comment box. In case you have more than one intermediate emission reduction target (with different target years or methodologies used to set them), please use either a) your SBT approach target (if you have one of those), or b) a target with the earliest target year - as a proxy in answering “Target Time Frame” and “Validation by SBTi” parts of this question. Please note that in both parts of the question, we will not accept targets without a target year specified. Focus of this question: This question assesses only targets that are set on the financed emissions, and not operational emissions. We do not expect companies active in (re-)insurance to have set emission reduction targets for their (re-)insurance underwriting portfolio but do expect targets on your investment/financing portfolio. Parent or subsidiary: Aligned with the SBTi, we recommend that companies submit targets only at the parent- or group-level, but not at the subsidiary level. Parent companies must include the emissions of all subsidiaries in their target submission. In cases where both parent companies and subsidiaries submit targets, the parent company’s target must also include the emissions of the subsidiary if it falls within the parent company’s emissions boundary, given the chosen inventory consolidation approach. Read more here. Not Applicable: Equity REITs and companies that act as financial service facilitators, such as stock exchanges, index licensors, data providers and electronic brokerage companies should mark this question as “Not applicable” and provide a brief explanation in the comment box. References This question is aligned with Science-Based Targets Initiative, Net-Zero Banking Alliance, Net-Zero Asset Owner Alliance, Paris Aligned Investment Initiative, Net-Zero Asset Managers Initiative, and Glasgow Financial Alliance for Net-Zero.

2.5.2 Scope 3 Financed Absolute Emissions
Additional credit may be granted for publicly available evidence.

Does your company measure and breakdown its **Scope 3 financed absolute emissions**? Also state the coverage of the emissions profile. For more information, please refer to the question guidance.

✔ Yes, our company measures its Scope 3 financed absolute emissions.

<table>
<thead>
<tr>
<th>Scope 3 Financed Absolute Emissions</th>
<th>FY 2020</th>
<th>FY 2021</th>
<th>FY 2022</th>
<th>FY 2023</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Scope 3 financed absolute emissions (metric tonnes CO2 equivalents)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Portfolio Coverage

✔ On-Balance Sheet assets/products
✔ Assets under management
✔ On-Balance sheet & Assets under Management
✔ Other

As a % of the following:

PUBLIC REPORTING

✔ Our data is publicly available. Please provide supporting evidence or web link.

THIRD-PARTY VERIFICATION

✔ Our data has been third-party verified in the most recent financial year reported. Please provide supporting evidence.

DATA CONSISTENCY

✔ We report publicly on this information, but the data in the table above differs from our publicly reported figures. Please provide an explanation in the comment box for this difference:

DATA BREAKDOWN

We break down the data for either of the calculation methodologies above based on the following categories. Please select any that apply and attach supporting evidence.

✔ Asset Class
✔ Sector/Industry
✔ Country/Region

✔ No, we do not calculate our organization’s Scope 3 financed absolute emissions.

✔ Not applicable. Please provide an explanation in the comment box.

✔ Not known

Info Text:

Question Rationale: The majority of emissions associated with the financial services industry occur in the investment chain - in fact, it is estimated that financed emissions are over 700 times larger than reported operational emissions. The financial sector must sharply decrease its year-on-year emissions to ensure that they are doing their part to cut global greenhouse gas emissions. Organizations in this sector may analyze their portfolios using specific metrics to understand how concentrations of climate-related risks and opportunities potentially impact their financing activities and to understand the impact their financing activities have on the climate.
climate. Scope 3 Category 15 investments may include total absolute emissions defined in the GHG protocol or other carbon footprinting and exposure metrics. Measuring absolute emissions gives financial institutions the baseline for climate action in alignment with the Paris Agreement, while measuring emission intensity metrics allows financial institutions, and investors to benchmark or compare companies, sectors, and/or portfolios to one another as the information is normalized. Each method has its own respective pros and cons, but both methods are recommended by standards and guidelines such as those by the Partnership for Carbon Accounting Financials (PCAF) and the United Nations Environment Programme – Finance Initiative (UNEP-FI). Understanding and measuring the climate impact of financial portfolios helps companies in the financial sector create additional transparency for stakeholders. It helps them better manage climate-related risks, develop climate-friendly financial products, and ultimately align activities with the Paris agreement.

Key Definitions

Scope 3 Financed Emissions: Category of emissions associated with the reporting company’s investments in the reporting year, not currently included in scope 1 or 2 emissions. These emissions are categorized as a downstream scope 3 category because of the provision of capital or financing provided by the reporting company, also known as Scope 3 Category 15. For this question, we consider emissions from loans and investments for which financial institutions do not have operational or financial control in line with the PCAF standard. Companies are expected to report their emissions for balance-sheet assets/products and assets under management (if applicable) as per the optional accounting approach specified by the GHG Protocol Absolute Emissions: The absolute greenhouse gas emissions associated with a portfolio, expressed in metric tonnes. Institutions shall disclose the absolute emissions (Scope 1 and 2 combined) of their loans and investments. Portfolio Coverage: This includes loans, investments, and insurance policies that the company may offer. Portfolio coverage may be based on either total or outstanding commitments, premiums, committed capital, and/or other. This may be reported as total balance sheet, total investments, total lending book, total assets under management, and more. Balance Sheet: Statement of financial position/financial condition for a company. It may include assets owned by the company, what the company owes others (liabilities) and shareholders’ investments (equity). Balance sheets may include current assets and accounts receivable (money owed to the company by customers who purchase on credit). Read more here.

Assets Under Management: Total market value of investments that an entity manages on behalf of clients. Carbon-Intensive Sectors: These sectors include agriculture, aluminum, cement, coal, commercial and residential real estate, iron and steel, oil and gas, power generation, and transport. More information is found on the UNEP FI Guidelines for Climate Target Setting for Banks. Asset Class: A group of investments that exhibit similar characteristics and often behave similarly to one another in the marketplace. This may include corporate instruments such as listed equity, corporate bonds, and business loans. Project finance, real estate (commercial and residential), and mortgages are other examples of asset classes for which GHG accounting methodologies have been developed. More information is found on the PCAF standard. Data Requirements We expect companies to disclose their Scope 3 absolute emissions for the latest fiscal year and if available companies should provide a breakdown by asset class/sectors. Companies are expected to have data for at least the latest fiscal year. Note that for this question we do not consider avoided emissions in this question, nor emission removals through investments in cleaner technology. Disclosure requirements for partially public question: Additional credit will be granted for relevant publicly available evidence covering total absolute emissions for the latest fiscal year. For portfolio coverage: Companies should select what elements of the business are covered in their coverage – on balance sheet items (lending/investment as asset owners), managed investments (Assets Under Management), or other (insurance premiums, underwriting, or other). Companies are also expected to disclose financed emissions as a percentage (%) of their loan and/or investment portfolios. As there may be limitations in data availability and quality, please note that financial institutions are not expected to disclose emissions for 100% of their portfolio but are expected to be transparent of coverage and should take steps to ensure the assessment covers a significant majority of their emissions. Not Applicable: Companies that act as financial service facilitators, such as stock exchanges, index licensors, and data providers should mark this question as “Not applicable” and provide an explanation in the comment box. References This question refers to leading reporting standings including the Partnership for Carbon Accounting Financials (PCAF), the Science Based Targets Initiative (SBTi) and the UNEP FI Guidelines for Climate Change Setting for Banks

2.5.3 Scope 3 Financed Emission Intensity

Additional credit may be granted for publicly available evidence.
Does your company measure and breakdown its **Scope 3 Financed Emission Intensity metrics**? Also state the coverage of the emissions profile. For more information, please refer to the question guidance

- Yes, our company measures its Scope 3 financed emissions using intensity metrics

<table>
<thead>
<tr>
<th>Scope 3 Financed Emissions Intensity</th>
<th>FY 2020</th>
<th>FY 2021</th>
<th>FY 2022</th>
<th>FY 2023</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Scope 3 emission intensity</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>❑ Weighted Average Carbon Intensity (WACI)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>❑ Carbon Intensity</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>❑ Carbon Footprint</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unit:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Coverage                            |         |         |         |         |
| ❑ On-Balance Sheet assets/products  |         |         |         |         |
| ❑ Assets Under Management           |         |         |         |         |
| ❑ On-Balance sheet & Assets Under Management |         |         |         |         |
| ❑ Other                             |         |         |         |         |
| As a % of the following:            |         |         |         |         |

**Public Reporting**

- Our data is publicly available. Please provide supporting evidence or web link

**THIRD-PARTY VERIFICATION**

- Our data has been third-party verified in the most recent financial year reported. Please provide supporting evidence.

**DATA CONSISTENCY**

- We report publicly on this information, but the data in the table above differs from our publicly reported figures. Please provide an explanation in the comment box for this difference:

**DATA BREAKDOWN**

We break down the data for either of the calculation methodologies above based on the following categories. Please select any that apply and attach supporting evidence.

- Asset Class
- Sector/Industry
- Country/Region

- No, we do not calculate our organization’s Scope 3 financed emission intensity.
- Not applicable. Please provide an explanation in the comment box.
- Not known
operational emissions. The financial sector must sharply decrease its year-on-year financed emissions to ensure that they are doing their part to cut global greenhouse gas emissions. Organizations in this sector may analyze their portfolios using specific metrics to understand how concentrations of climate-related risks and opportunities potentially impact their financing activities and to understand the impact their financing activities have on the climate. Scope 3 Category 15 investments may include total absolute emissions defined in the GHG protocol or other carbon foot-printing and exposure metrics. Measuring absolute emissions gives financial institutions the baseline for climate action in alignment with the Paris Agreement, while measuring emission intensity metrics allows financial institutions, and investors to benchmark or compare companies, sectors, and/or portfolios to one another as the information is normalized. Each method has its own respective pros and cons, as such this question looks to assess the extent to which a company understands its portfolio climate-related impact. Understanding and measuring the climate impact of financial portfolios helps companies in the financial sector create additional transparency for stakeholders, it helps them better manage climate-related risks, develop climate-friendly financial products, and ultimately align activities with the Paris Agreement. Key Definitions Scope 3 Financed Emissions: Category of emissions associated with the reporting company’s investments in the reporting year, not currently included in Scope 1 or 2 emissions. These emissions are categorized as a downstream Scope 3 category because of the provision of capital or financing provided by the reporting company, also known as Category 15 Scope 3 emissions. For this question, we consider emissions from loans and investments for which financial institutions do not have operational or financial control in line with the PCAF standard. Companies are expected to report their emissions for on balance-sheet assets/products and assets under management (if applicable) as per the optional accounting approach specified by the GHG Protocol Weighted Average Carbon Intensity (WACI): Portfolio’s exposure to carbon-intensive companies expressed in tons. The WACI is calculated by summing the product of each company’s weight in the portfolio or loan book with that company’s carbon-to-revenue intensity. The avoidance of apportioning with the WACI approach means that there is no direct connection to real-world emissions. The metric gives an indication of how exposed, from a financial perspective, a portfolio or loan book is to high (or low) carbon intensive companies. This is typically done on a fund-level. More information is found here. Carbon Footprint: Total carbon emissions for a portfolio normalized by the market value of the portfolio, expressed in tons CO2e/$M invested. Carbon Intensity: Volume of carbon emissions per million dollars of revenue (carbon efficiency of a portfolio). This adopts an equity ownership approach to scope 1 and scope 2 GHG emissions. Portfolio Coverage: This includes loans, investments, and insurance policies that your company may offer. Portfolio coverage may be based on either total or outstanding commitments, premiums, committed capital, and/or other. This may be reported as total balance sheet, total investments, total lending book, total assets under management, and more. Balance Sheet: Statement of financial position/financial condition for a company. It may include assets owned by the company, what the company owes others (liabilities) and shareholders investments (equity). Balances sheets may include current assets and accounts receivable (money owed to the company by customers who purchase on credit). Read more here. Assets Under Management: Total market value of investments that an entity manages on behalf of clients Carbon-Intensive sectors: These sectors include agriculture, aluminum, cement, coal, commercial and residential real estate, iron and steel, oil and gas, power generation, and transport. More information found on the UNEP FI Guidelines for Climate Target Setting for Banks. Asset class: A group of investments that exhibit similar characteristics and often behave similarly to one another in the marketplace. This may include corporate instruments such as listed equity, corporate bonds, and business loans. Project finance, real estate (commercial and residential), and mortgages are other examples of asset classes for which GHG accounting methodologies have been developed. More information is found on the PCAF standard. Data Requirements We expect companies to disclose a Scope 3 financed emission intensity metric for the latest fiscal year and if available companies should provide a breakdown by asset class/sectors. Companies are expected to have data for at least the latest fiscal year. Note that for this question we do not consider avoided emissions in this question, nor emission removals through investments in cleaner technology. Disclosure requirements for partially public question: Additional credit will be granted for relevant publicly available evidence covering a financed emission intensity metric value for the latest fiscal year. For portfolio coverage: Companies should select what elements of the business are covered in their coverage – on balance sheet items (lending/investment as asset owners), managed investments (AUM), or other (insurance premiums, underwriting, or other). Companies are also expected to disclose financed emissions as a percentage (%) of their loan and/or investment portfolios. As there may be limitations in data availability and quality, please note that financial institutions are not expected to disclose emissions for 100% of their portfolio but are expected to be transparent of coverage and should take steps to ensure the assessment covers a significant majority of their emissions. Not Applicable: Companies that act as financial service facilitators, such as stock exchanges, index licensors, and data providers should mark this question as “Not applicable” and provide an explanation in the comment box. References This question refers to leading...
reporting standings including the Partnership for Carbon Accounting Financials (PCAF), the Science Based Targets Initiative (SBTi) and the UNEP FI Guidelines for Climate Change Setting for Banks

2.5.4 Coal Financing Policy

This question requires publicly available information.

Does your company currently finance thermal coal? If so, does your company have a publicly available policy in place to restrict and/or exclude coal financing? Please indicate where this information is available in your public reporting or corporate website.

- Yes, we currently finance coal and have a policy in place to restrict and/or exclude coal financing

PART 1: Business Coverage

Please indicate which elements of your financing business are covered by your policy. If your company is not active in one or more of the activities below, mark not applicable within the corresponding cell.

<table>
<thead>
<tr>
<th>Business Activities</th>
<th>Coal Policy Coverage</th>
</tr>
</thead>
</table>
| Credit Lines/Lending Activities            | ◐ Yes  
|                                             | ◐ No  
|                                             | ◐ Not applicable     |
| Underwriting Fixed Income Product Activities | ◐ Yes  
|                                             | ◐ No  
|                                             | ◐ Not applicable     |
| Infrastructure Finance/Project Finance     | ◐ Yes  
|                                             | ◐ No  
|                                             | ◐ Not applicable     |

PART 2: Policy on Coal Financing

Please indicate which of the following elements are included in your coal policy.

- Time-bound engagement with coal clients
- Global phase-out commitment

<table>
<thead>
<tr>
<th>Policy Aspects</th>
<th>Relative/Absolute Thresholds for Clients</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coal Mining</td>
<td>◐ Relative Threshold (% of revenue from coal mining per year)</td>
</tr>
<tr>
<td>Project-specific finance</td>
<td>◐ Absolute Threshold (Coal mining production per year Mt)</td>
</tr>
<tr>
<td>Corporate Finance</td>
<td>◐ We do not have relative/absolute thresholds in place for clients active in coal mining</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Policy Aspects

<table>
<thead>
<tr>
<th>Coal Power</th>
<th>Project-specific finance</th>
<th>Corporate Finance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>❑ Ceased financing for new coal projects and expansion of existing coal projects</td>
<td>❑ Ceased financing to coal companies which are expanding (new and existing clients)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Coal Infrastructure</th>
<th>Project-specific finance</th>
<th>Corporate Finance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>❑ Ceased financing for new coal projects and expansion of existing coal projects</td>
<td>❑ Ceased financing to coal companies which are expanding (new and existing clients)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Relative/Absolute Thresholds for Clients</th>
</tr>
</thead>
<tbody>
<tr>
<td>❑ Relative Threshold (% of energy generated from coal per year)</td>
</tr>
<tr>
<td>❑ We do not have relative/absolute thresholds in place for clients active in coal power</td>
</tr>
</tbody>
</table>

| ❑ No, we do not currently finance coal. |
| ❑ No, we do not have a policy in place to restrict financing for coal, but do finance coal |
| ❑ Not applicable – we are not active in financing activities. Please provide explanations in the comment box below. |

**Info Text:**

Current emissions from coal, oil, and gas in production would push us beyond the 1.5C level and likely into a 2C scenario. While coal has contributed to the development of economies around the world, it is also responsible for the largest production of global greenhouse gas emissions. Research also shows that the share of uncompetitive coal plants worldwide is set to increase. Already in 2018, 42% of the global thermal coal operating fleet was unprofitable. By 2030, about half of the global thermal coal capacity could be loss-making, and by 2040, 72% will be unprofitable. Financial institutions, in both developed and developing countries, must reduce their exposure to thermal coal by 2030 in line with 1.5C emission pathways. Not doing so may expose financial institutions to risk of stranded assets, the detrimental impact of climate change, and other reputational and regulatory risks. As such, financial institutions are expected to establish policies and relevant targets that highlight their commitment to phase out financial support to coal by 2030. Key Definitions: Financing activities: the provision of corporate credit lines and lending, project and infrastructure finance, fixed income underwriting. Coal Companies: As described by the SBTi coal companies are those with greater than 5% of revenues from thermal coal mining, exploration and drilling, mining services, processing, trading, transport and logistics, equipment manufacturing, engineering, transmission and distribution of coal-fired electricity, coal to liquids and coal to gas. Coal Companies that are expanding: Thermal coal companies that are building new infrastructure or investing in new or additional thermal coal expansion, mining, production, utilization (i.e., combustion), retrofitting, or acquiring of coal assets. Find out more here. Coal Mining: The extraction of thermal coal, also known as steaming coal, which is burned to generate steam and/or electricity. Thermal coal is as opposed to coking coal (also metallurgical coal) which is used in the production of metals such as iron and steel, and coking coal is not considered in the scope of this question. Coal mining includes both surface (open pit) and subsurface mines. Coal Power: The burning of coal at coal-fired power plants for the generation of energy. The plants may be used to generate electricity for public grids or to generate electricity or steam for industry and manufacturing. Coal Infrastructure: Coal-related infrastructure may include railway lines and trains, ships and barges used to transport coal, pipelines, coal terminals, coal haulage companies and coal processing plants. Coal Share of Revenues (CSR): Proportion of a company’s revenues that derive from coal-related business (mining, power or infrastructure). Time-bound engagement: Action time-bound plans to influence portfolio companies/clients to undertake measures that help accelerate a net-zero transition in the real economy, align their business models with pathways...
needed to reach the goals of Paris Agreement, and/or set science-based targets. Escalation processes should be in place for when engagement does not lead to significant results within a set time frame. Phase-out commitment: The year by which a financial institution commits to having no remaining exposure to coal. In order to limit the impact of climate change, and remain on a 1.5°C pathway, financial institutions must phase out most coal assets by 2030 in line with IPCC for industrialized countries and a full phaseout globally by 2040. Project-specific finance: A method of financing in which the lender looks primarily to the revenues generated by a project as a source of repayment. In this question, we also consider project finance advisory services, project-related corporate loans, bridge loans, and/or project-related refinance General Corporate Finance for Coal Companies: Capital investments used to build a company’s long-term capital, which includes but is not limited to underwriting and advisory services for companies developing new coal Relative thresholds: Are the percentage of revenues a company derives from coal-related business (mining, power or infrastructure) above which the financial institution will no longer finance/invest in/underwrite the company. Absolute thresholds: Are measured in mega tonnes (for mining) or gigawatts (for power) and denote the amount of coal a company produces above which a financial institution will not finance/invest in/underwrite that company. Data Requirements This question requires public evidence. We expect companies to have a policy explicitly excluding or restricting the financing of coal – with reference to mining, power, and infrastructure projects, and general corporate finance for thermal coal companies expanding. Policies should define how an organization looks to achieve an identified goal and/or purpose and should provide clarity on how success is measured. Anecdotal evidence concerning coal financing activities will not be accepted as a policy. Please note that the 5% rule is not applicable for Decarbonization criteria; therefore, the question must be answered if the company has any financing activities, regardless of the percentage of revenue derived from it. Policies include relative and/or absolute thresholds for coal clients – these should be applicable to existing clients. Therefore, if several thresholds are available, please use the threshold currently in place for existing clients. The policy should also state whether it is a global policy, or state which divisions of the financial institution the policy applies to. If multiple policies are available, please use the policy that covers the majority of assets (greater percentage of revenues in your business) No, we do not currently finance coal: We expect companies to publicly disclose that they do not finance or do not have exposure to coal. Not Applicable: Companies that act as financial service facilitators, such as stock exchanges, index licensors, and data providers can/should mark this question as “Not applicable” and provide a brief explanation in the comment box. References This question refers to the SBTi Guidance for the Financial Sector, the UNEP-FI Guidelines for Climate Target Setting for Banks.

2.5.5 Coal Investment Policy

This question requires publicly available information.

Does your company currently invest in thermal coal? If so, does your company have a publicly available policy in place to restrict and/or exclude coal investments? Please indicate where this information is available in your public reporting or corporate website

❖ Yes, we currently invest in coal and have a policy in place to restrict and/or exclude coal investments

**PART 1: Business Coverage**

Please indicate which elements of your investment business are covered by your policy. If your company is not active in one or more of the activities below, mark **not applicable** within the corresponding cell.

<table>
<thead>
<tr>
<th>Business Activities</th>
<th>Coal Policy Coverage</th>
</tr>
</thead>
<tbody>
<tr>
<td>All Active Investments</td>
<td>❖ Yes</td>
</tr>
<tr>
<td></td>
<td>❖ No</td>
</tr>
<tr>
<td></td>
<td>❖ Not applicable</td>
</tr>
<tr>
<td>All Passive Investments</td>
<td>❖ Yes</td>
</tr>
<tr>
<td></td>
<td>❖ No</td>
</tr>
<tr>
<td></td>
<td>❖ Not applicable</td>
</tr>
</tbody>
</table>
### Part 2: Policy for Coal Investing
Please indicate which of the following elements are included in your coal policy.

- **Time-bound engagement with coal clients/investees**
- **Global phase-out commitment**

#### Policy Aspects | Relative/Absolute Thresholds for Clients/Investees
--- | ---
**Coal Mining** |  
- Investments  
  - Ceased investments coal companies which are expanding (new and existing investments)  
  - Relative Threshold (\% of revenue from coal mining per year)  
  - Absolute Threshold (coal mining production per year MT)  
  - We do not have relative/absolute thresholds in place for clients/investees in coal mining  
**Coal Power** |  
- Investments  
  - Ceased investments coal companies which are expanding (new and existing investments)  
  - Relative Threshold (\% of energy generated from coal per year)  
  - Absolute Threshold (GW)  
  - We do not have relative/absolute thresholds in place for clients/investees in coal power  
**Coal Infrastructure** |  
- Investments  
  - Ceased investments coal companies which are expanding (new and existing investments)  
  - Relative Threshold (\% of revenue from transporting coal per year)  
  - We do not have relative thresholds in place for clients/investees in coal infrastructure

- No, we do not currently invest in coal.
- No, we do not have a policy in place to restrict investing in coal, but do invest in coal.
- Not applicable – we are not active in investing activities. Please provide explanations in the comment box below.

**Info Text:**
Question Rationale: Currently emissions from coal, oil, and gas in production would push us beyond the 1.5°C level and likely into a 2°C scenario. While coal has contributed to the development of economies around the world, it is also responsible for the largest production of global greenhouse gas emissions. Research also shows that the share of uncompetitive coal plants worldwide is set to increase. Already in 2018, 42% of the...
global thermal coal operating fleet was unprofitable. By 2030, about half of the global thermal coal capacity could be loss-making, and by 2040, 72% will be unprofitable. Financial institutions, in both developed and developing countries, must reduce their exposure to thermal coal by 2030 in line with 1.5°C emission pathways. Not doing so may expose financial institutions to risk of stranded assets, the detrimental impact of climate change, and other reputational and regulatory risks. As such, financial institutions are expected to establish policies and relevant targets that highlight their commitment to phase out financial support to coal by 2030. Key Definitions Investment activities: such as asset management, and asset ownership by institutional investors and insurance companies. Coal Companies: As described by the SBTi coal companies are those with greater than 5% of revenues from thermal coal mining, exploration and drilling, mining services, processing, trading, transport and logistics, equipment manufacturing, engineering, transmission and distribution of coal-fired electricity, coal to liquids and coal to gas. Coal Companies that are expanding: Thermal coal companies that are building new infrastructure or investing in new or additional thermal coal expansion, mining, production, utilization (i.e., combustion), retrofitting, or acquiring of coal assets. Find out more here Coal Mining: The extraction of thermal coal, also known as steaming coal, which is burned to generate steam and/or electricity. Thermal coal is as opposed to coking coal (also metallurgical coal) which is used in the production of metals such as iron and steel, and coking coal is not considered in the scope of this question. Coal mining includes both surface (open pit) and subsurface mines. Coal Power: the burning of coal at coal-fired power plants for the generation of energy. The plants may be used to generate electricity for public grids or to generate electricity or steam for industry and manufacturing. Coal Infrastructure: coal-related infrastructure may include the railway lines and trains, ships and barges used to transport coal, pipelines, coal terminals, coal haulage companies and coal processing plants. Coal Share of Revenues (CSR): proportion of a company’s revenues that derive from coal-related business (mining, power or infrastructure). Time-bound engagement are action time-bound plans to influence portfolio companies/clients to undertake measures that help accelerate a net-zero transition in the real economy, align their business models with pathways needed to reach the goals of Paris Agreement, and/or set science-based targets. Escalation processes should be in place for when engagement does not lead to significant results within a set time frame. Phase-out commitment: The year by which a financial institution commits to having no remaining exposure to coal. In order to limit the impact of climate change, and remain on a 1.5°C pathway, financial institutions must phase out most coal assets by 2030 in line with IPCC for industrialized countries and a full phaseout globally by 2040. Relative thresholds: Are the percentage of revenues a company derives from coal-related business (mining, power or infrastructure) above which the financial institution will no longer finance/invest in/underwrite the company. Absolute thresholds: Are measured in mega tonnes (for mining) or gigawatts (for power) and denote the amount of coal a company produces above which a financial institution will not finance/invest in/underwrite the company. Data Requirements This question requires public evidence. We expect companies to have a policy explicitly excluding or restricting investment in coal – with reference to mining, power, and infrastructure projects. Policies should define how an organization looks to achieve an identified goal and/or purpose and should provide clarity on how success is measured. Anecdotal evidence concerning coal investment activities will not be accepted as a policy. The policy should apply to all investments, e.g., not only to ESG focused funds. Please note that the 5% rule is not applicable for Decarbonization criteria; therefore, the question must be answered if the company has any investing activities, regardless of the percentage of revenue derived from it. Policies include relative and/or absolute thresholds for coal clients/investees – these should be applicable to existing clients. Therefore, if several thresholds are available, please use the threshold currently in place for existing clients. The policy should apply to all investments, e.g., not only to ESG focused funds. The policy should also state whether it is a global policy, or state which divisions of the financial institution the policy applies to. If multiple policies are available, please use the policy that covers the majority of assets (greater percentage of revenues in your business) No, we do not currently invest in coal: We expect companies to publicly disclose that they do not invest or do not have exposure to coal. Not applicable: Companies that act as financial service facilitators, such as stock exchanges, index licensors, and data providers can/should mark this question as “Not applicable” and provide a brief explanation in the comment box. References This question refers to the SBTI Guidance for the Financial Sector, the UNEP-FI Guidelines for Climate Target Setting for Banks.

2.5.6 Unconventional Oil & Gas Financing Policy

This question requires publicly available information.
Does your company currently finance the below mentioned unconventional oil & gas fuels? If so, does your company have a publicly available policy in place to restrict and/or exclude unconventional oil & gas financing? Please indicate where this information is available in your public reporting or corporate website. For more information, please refer to the question guidance.

- Yes, we currently finance unconventional oil & gas and have a policy in place to restrict and/or exclude this financing.

**PART 1: Business Coverage**

Please indicate which elements of your financing business are covered by your policy. If your company is not active in one or more of the activities below, mark not applicable within the corresponding cell.

<table>
<thead>
<tr>
<th>Business Activities</th>
<th>Unconventional Oil &amp; Gas Coverage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Credit Lines/Lending Activities</td>
<td>❍ Yes</td>
</tr>
<tr>
<td></td>
<td>❍ No</td>
</tr>
<tr>
<td></td>
<td>❍ Not applicable</td>
</tr>
<tr>
<td>Underwriting Fixed Income Product Activities</td>
<td>❍ Yes</td>
</tr>
<tr>
<td></td>
<td>❍ No</td>
</tr>
<tr>
<td></td>
<td>❍ Not applicable</td>
</tr>
<tr>
<td>Infrastructure Finance/Project Finance</td>
<td>❍ Yes</td>
</tr>
<tr>
<td></td>
<td>❍ No</td>
</tr>
<tr>
<td></td>
<td>❍ Not applicable</td>
</tr>
</tbody>
</table>

**PART 2: Policy for Unconventional Oil & Gas Financing**

Please indicate which of the following elements is included in your unconventional oil & gas policy.

- ❍ Time-bound engagement with unconventional oil & gas clients

<table>
<thead>
<tr>
<th>Policy Aspects</th>
<th>Relative Threshold</th>
</tr>
</thead>
<tbody>
<tr>
<td>❍ Tar Sands</td>
<td></td>
</tr>
<tr>
<td>❍ Tar Sands are not a part of our Unconventional Oil &amp; Gas Policy</td>
<td></td>
</tr>
<tr>
<td>❍ We do not finance Tar Sands</td>
<td></td>
</tr>
<tr>
<td>❍ Ceased financing for new unconventional oil &amp; gas projects and expansion of existing projects</td>
<td></td>
</tr>
<tr>
<td>❍ Policy covers the whole production cycle (inc. Infrastructure)</td>
<td></td>
</tr>
<tr>
<td>❍ Global Phase-out commitment</td>
<td></td>
</tr>
<tr>
<td>❍ Shale Oil &amp; Gas</td>
<td></td>
</tr>
<tr>
<td>❍ Shale Oil &amp; Gas is not a part of our Unconventional Oil &amp; Gas Policy</td>
<td></td>
</tr>
<tr>
<td>❍ We do not finance Shale Oil &amp; Gas</td>
<td></td>
</tr>
<tr>
<td>❍ Ceased financing for new unconventional oil &amp; gas projects and expansion of existing projects</td>
<td></td>
</tr>
<tr>
<td>❍ Policy covers the whole production cycle (inc. Infrastructure)</td>
<td></td>
</tr>
<tr>
<td>❍ Global Phase-out commitment</td>
<td></td>
</tr>
</tbody>
</table>
### Policy Aspects and Relative Thresholds for Clients

<table>
<thead>
<tr>
<th>Policy Aspects</th>
<th>Relative Thresholds for Clients</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Arctic Oil &amp; Gas</strong></td>
<td></td>
</tr>
<tr>
<td>Arctic Oil &amp; Gas is not a part of our Unconventional Oil &amp; Gas Policy</td>
<td>□ Ceased financing for new unconventional oil &amp; gas projects and expansion of existing projects</td>
</tr>
<tr>
<td>We do not finance Arctic Oil &amp; Gas</td>
<td>□ Policy covers the whole production cycle (inc. Infrastructure)</td>
</tr>
<tr>
<td>□ Global Phase-out commitment</td>
<td>□ Relative Threshold</td>
</tr>
<tr>
<td><strong>Liquified Natural Gas (LNG)</strong></td>
<td></td>
</tr>
<tr>
<td>Liquified Natural Gas (LNG) is not a part of our Unconventional Oil &amp; Gas Policy</td>
<td>□ Ceased financing for new unconventional oil &amp; gas projects and expansion of existing projects</td>
</tr>
<tr>
<td>We do not finance Liquified Natural Gas (LNG)</td>
<td>□ Policy covers the whole production cycle (inc. Infrastructure)</td>
</tr>
<tr>
<td>□ Global Phase-out commitment</td>
<td>□ Relative Threshold</td>
</tr>
<tr>
<td><strong>Ultra-Deep-Water (UDW) Oil &amp; Gas</strong></td>
<td></td>
</tr>
<tr>
<td>Ultra-Deep-Water (UDW) Oil &amp; Gas is not a part of our Unconventional Oil &amp; Gas Policy</td>
<td>□ Ceased financing for new unconventional oil &amp; gas projects and expansion of existing projects</td>
</tr>
<tr>
<td>We do not finance UDW Oil &amp; Gas</td>
<td>□ Policy covers the whole production cycle (inc. Infrastructure)</td>
</tr>
<tr>
<td>□ Global Phase-out commitment</td>
<td>□ Relative Threshold</td>
</tr>
</tbody>
</table>

- No, we do not currently finance any unconventional oil & gas
- No, we do not have a policy in place to restrict financing for different types of unconventional oil & gas, but do finance unconventional oil & gas.
- Not applicable - we are not active in financing activities. Please provide explanations in the comment box below.

**Info Text:**

Question Rationale While there is ample supply of financing to tackle the economic impact of climate change, the world currently lacks the means of getting that money where it is needed. Despite the Paris Agreement being adopted in 2015, and fossil fuel use decreasing, fossil fuel financing continues to increase through 2020. Thus, coordinated action is necessary between the public and private sector to finance the transition to more climate-friendly projects, but measures also need to phase out fossil fuel financing. Currently emissions from coal, oil, and gas in production would push us beyond the 1.5°C level and likely into a 2°C scenario – global carbon dioxide emissions must be halved in order to even have a 50% chance to limit global warming to 1.5°C. In parallel to the $3.5 trillion annually needed in investments in low-carbon and energy-efficient technologies, financial institutions (FIs) are also expected to introduce policies to cancel and/or limit their fossil fuel financing. Science Based Targets Initiative currently recommends for those FIs seeking to set net-zero targets a “disclosure, transition, and phase-out approach”, which includes an “end all financial support (excluding decarbonization or transition to zero-carbon alternatives) to existing coal assets by 2030 and to existing oil and gas assets by 2040”. Key Definitions Financing activities: the provision of corporate credit lines and lending, project and infrastructure finance, fixed income underwriting. Unconventional Oil & Gas: An umbrella term for oil and gas that is typically heavier and contains more carbon and sulfur. They may also contain more impurities that make them more difficult to reach and refine. Note that “conventional” and “unconventional” categories do not remain fixed, and over time may evolve. Tar Sands: Tar sands (also called oil sands) refer to
sand and clay that are naturally mixed with a viscous form of heavy crude oil known as bitumen. Due to its high viscosity this oil cannot be extracted through conventional methods and instead requires more energy and water-intensive extraction and refining processes which can produce three times as much CO2 as conventional oil. Shale Oil & Gas: Natural gas/oil contained within a rock classified as shale – which is characterized by low permeability. Shale gas is generally produced using hydraulic fracturing, where a high-pressure injection of water, sand and chemicals forces the oil & gas to flow out. Extraction and use of shale gas can be associated with environmental degradation through the leaking of extraction chemicals and waste into water supplies. Furthermore, its extraction through fracking has contributed to the release of large amounts of methane, which would make this gas as bad for the climate as coal. Arctic Oil & Gas: Oil and gas exploration, development, and production in the Arctic region, where the Arctic region is defined as the region inside the Arctic Circle (66.5 degrees north of the Equator); Arctic oil and gas drilling may significantly alter ecosystems and marine life. There are also high operational risks if operating in the arctic – for example, oil recovery in the case of a spill is difficult given the thick ice, and response capacity remains low. Liquified Natural Gas (LNG) derived from conventional extractions: Liquified Natural Gas (LNG) production is also considered a non-conventional treatment if the gas treated is derived from the above-listed unconventional fossil fuels. LNG is a cooled natural gas in the form of a clear, colorless, and non-toxic liquid with a volume 1/600th as large as natural gas making it easier to store and transport globally. The GHG emissions from extraction, transport, liquefaction, and re-gasification may be equal to emissions produced from the burning of natural gas; in fact, overseas export of LNG can account for 21% of its total life-cycle emissions. Offshore Oil & Gas: For the purposes of this question, only deep water and ultra-deepwater oil & gas (offshore) is considered as unconventional fossil fuel. This includes deep water and ultra-deepwater oil & gas, where water depth is greater than 1,000 ft (300m) and 5,000 ft (1,500m) respectively. Offshore oil production contributes to, and involves, environmental risks – for example, methane emissions warm supporting areas which has contributes to increase natural disasters like hurricanes, while platforms may also suffer oil spills. Their operations and may also be associated with high occupational health and safety risks. Infrastructure: The associated transport, processing, and refining facilities for oil & gas extraction, which may include pipelines, ships, terminals, refineries, and storage facilities. These may be provided by companies which specialize in services & equipment for the hydrocarbon industry. Data Requirements This question requires public evidence. We expect companies to have a policy explicitly excluding or restricting the financing of unconventional oil & gas types as defined above. Policy commitments with respect to a particular oil & gas should also restrict financing to infrastructure projects, and companies should state their global phase-out for each respective oil & gas. If a phase-out commitment applies to several oil & gases, then please state the year for each oil & gas. Policies should define how an organization looks to achieve an identified goal and/or purpose and should provide clarity on how success is measured. Anecdotal evidence concerning oil & gas financing activities will not be accepted as a policy. Please note that the 5% rule is not applicable for Decarbonization criteria; therefore, the question must be answered if the company has any financing activities, regardless of the percentage of revenue derived from it. Policies should include relative thresholds for clients/investees – if several thresholds are available, please use the threshold currently in place for existing clients. The policy should also state whether it is a global policy, or state which divisions of the financial institution the policy applies to. If multiple policies are available, please use the policy that covers the majority of assets (greater percentage of revenues in your business). Policies or policy elements with material exceptions will not be accepted. The only acceptable type of exception to a policy is for companies/projects with time-bound transition plans that are aligned with the Paris Agreement. No, we do not currently finance any unconventional oil & gas: We expect companies to publicly disclose that they do not finance or do not have exposure to any fossil fuels. Not Applicable: Companies that act as financial service facilitators, such as stock exchanges, index licensors, and data providers can/should mark this question as “Not applicable” and provide a brief explanation in the comment box. References This question refers to the SBTI Guidance for the Financial Sector; the UNEP-FI Guidelines for Climate Target Setting for Banks.

2.5.7 Unconventional Oil & Gas Investment Policy

This question requires publicly available information.

Does your company currently invest in the below mentioned unconventional oil & gas fuels? If so, does your company have a publicly available policy in place to restrict and/or exclude unconventional oil & gas investment? Please indicate where this information is available in your public reporting or corporate website. For more information, please refer to the question guidance.
Yes, we currently invest in unconventional oil & gas and have a policy in place to restrict and/or exclude these investments.

**PART 1: Business Coverage**
Please indicate which elements of your investment business are covered by your policy. If your company is not active in one or more of the activities below, mark **not applicable** within the corresponding cell.

<table>
<thead>
<tr>
<th>Business Activities</th>
<th>Unconventional Oil &amp; Gas Policy Coverage</th>
</tr>
</thead>
<tbody>
<tr>
<td>All active investments</td>
<td><img src="Yes" alt="Yes" /> <img src="No" alt="No" /> ![Not applicable](Not applicable)</td>
</tr>
<tr>
<td>All Passive Investments</td>
<td><img src="Yes" alt="Yes" /> <img src="No" alt="No" /> ![Not applicable](Not applicable)</td>
</tr>
<tr>
<td>All Third-party managed investments</td>
<td><img src="Yes" alt="Yes" /> <img src="No" alt="No" /> ![Not applicable](Not applicable)</td>
</tr>
</tbody>
</table>

**PART 2: Policy for Unconventional Oil & Gas Investment**
Please indicate which of the following elements is included in your unconventional oil & gas policy.

- **Tar Sands**
  - Tar Sands are not a part of our Unconventional Oil & Gas Policy
  - We do not invest in Tar Sands
  - Exclusion of new projects
  - Policy covers the whole production cycle (inc. infrastructure)
  - Global Phase-out commitment
  - ![Relative Threshold](Relative Threshold)

- **Shale Oil & Gas**
  - Shale Oil & Gas is not a part of our Unconventional Oil & Gas Policy
  - We do not invest in Shale Oil & Gas
  - Exclusion of new projects
  - Policy covers the whole production cycle (inc. infrastructure)
  - Global Phase-out commitment
  - ![Relative Threshold](Relative Threshold)

- **Arctic Oil & Gas**
  - Arctic Oil & Gas is not a part of our Unconventional Oil & Gas Policy
  - We do not invest in Arctic Oil & Gas
  - Exclusion of new projects
  - Policy covers the whole production cycle (inc. infrastructure)
  - Global Phase-out commitment
  - ![Relative Threshold](Relative Threshold)

- **Liquified Natural Gas (LNG)**
  - Liquified Natural Gas (LNG) is not a part of our Unconventional Oil & Gas Policy
  - We do not invest in Liquified Natural Gas (LNG)
  - Exclusion of new projects
  - Policy covers the whole production cycle (inc. infrastructure)
  - Global Phase-out commitment
  - ![Relative Threshold](Relative Threshold)
<table>
<thead>
<tr>
<th>Policy Aspects</th>
<th>Relative Thresholds for Clients/Investees</th>
</tr>
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<tbody>
<tr>
<td>❍ Ultra-Deep-Water (UDW) Oil &amp; Gas</td>
<td>❍ Exclusion of new projects</td>
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<td>❍ Ultra-Deep-Water (UDW) Oil &amp; Gas is not a part of our Unconventional Oil &amp; Gas Policy</td>
<td>❍ Policy covers the whole production cycle (inc. infrastructure)</td>
</tr>
<tr>
<td>❍ We do not invest in UDW Oil &amp; Gas</td>
<td>❍ Global Phase-out commitment</td>
</tr>
</tbody>
</table>

- No, we do not currently invest in any unconventional oil & gas.
- No, we do not have a policy in place to restrict investment in different types of unconventional oil & gas, but do invest in unconventional oil & gases.
- Not applicable - we are not active in investment activities. Please provide explanations in the comment box below.

Info Text:
Question Rationale: While there is ample supply of financing to tackle the economic impact of climate change, the world currently lacks the means of getting that money where it is needed. Despite the Paris Agreement being adopted in 2015, and fossil fuel use decreasing, fossil fuel financing has continued to increase through 2020. Thus, coordinated action is necessary between the public and private sector to finance the transition to more climate-friendly projects, but measures are also needed to phase out fossil fuel financing. Currently, emissions from coal, oil, and gas in production would push us beyond the 1.5C level and likely into a 2C scenario – global carbon dioxide emissions must be halved in order to even have a 50% chance to limit global warming at 1.5C. In addition to the $3.5 trillion annually needed in investments in low-carbon and energy-efficient technologies, financial institutions (FIs) are also expected to introduce policies to cancel and/or limit their fossil fuel financing. The Science Based Targets Initiative currently recommends for those FIs seeking to set net-zero targets a “disclosure, transition, and phase-out approach”, which includes an “end all financial support (excluding decarbonization or transition to zero-carbon alternatives) to existing coal assets by 2030 and to existing oil and gas assets by 2040”. Key Definitions: Investment activities: such as asset management, and asset ownership by institutional investors and insurance companies. Unconventional Oil & Gas: An umbrella term for oil and gas that is typically heavier and contains more carbon and sulfur. They may also contain more impurities that make them more difficult to reach and refine. Note that “conventional” and “unconventional” categories do not remain fixed, and over time may evolve. Tar Sands: Tar sands (also called oil sands) refer to sand and clay that is naturally mixed with a viscous form of heavy crude oil known as bitumen. Due to its high viscosity this oil cannot be extracted through conventional methods and instead requires more energy and water-intensive extraction and refining processes which can produce three times as much CO2 as conventional oil. Shale Oil & Gas: Natural gas/oil contained within a rock classified as shale – which is characterized by low permeability. Shale gas is generally produced using hydraulic fracturing, where a high-pressure injection of water, sand and chemicals forces the oil & gas to flow out. Extraction and use of shale gas can be associated with environmental degradation through the leaking of extraction chemicals and waste into water supplies. Furthermore, its extraction through fracking contributes to the release of large amounts of methane, which would make this gas as bad for the climate as coal. Arctic Oil & Gas: Oil and gas exploration, development, and production in the Arctic region, where the Arctic region is defined as the region inside the Arctic Circle (66.5 degrees north of the Equator); Arctic oil and gas drilling may significantly alter ecosystems and marine life. There are also high operational risks if operating in the arctic – for example, oil recovery in the case of a spill is difficult given the thick ice, and response capacity remains low. Liquefied Natural Gas (LNG) derived by non-conventional extractions: Liquefied Natural Gas (LNG) production is also considered a non-conventional treatment if the gas treated is derived from the above-listed unconventional fossil fuels. LNG is a cooled natural gas in the form of a clear, colorless, and non-toxic liquid with a volume 1/600th as large as natural gas making it easier to store and transport globally. The GHG emissions from extraction, transport, liquefaction, and re-gasification may be equal to emissions produced from the burning of natural gas; in fact, overseas export of LNG can account for 21% of its total life-cycle emissions. Offshore Oil & Gas: For the purposes of this question, only deep water and ultra-deepwater oil & gas (offshore) is considered an unconventional fossil fuel. This includes deep water and ultra-deepwater oil & gas, where water depth is greater than 1,000 ft (300m) and 5,000 ft (1,500m) respectively. Offshore oil production contributes to, and involves, environmental risks – for example, methane emissions warm surrounding areas.
which contributes to an increase in natural disasters like hurricanes, while platforms may also suffer oil spills. Their operations may also be associated with high occupational health and safety risks. Infrastructure: The associated transport, processing, and refining facilities for oil & gas extraction, which may include pipelines, ships, terminals, refineries, and storage facilities. These may be provided by companies which specialize in services & equipment for the hydrocarbon industry. Data Requirements This question requires public evidence. We expect companies to have a policy explicitly excluding or restricting the financing of unconventional oil & gases as defined above. Policy commitments with respect to a particular oil & gas should also restrict investment in infrastructure projects, and companies should state their global phase-out for each respective oil & gas. If a phase-out commitment applies to several oil & gases, then please state the year for each oil & gas. Policies should define how an organization looks to achieve an identified goal and/or purpose and should provide clarity on how success is measured. Anecdotal evidence concerning investment activities will not be accepted as a policy. Please note that the 5% rule is not applicable for Decarbonization criteria; therefore, the question must be answered if the company has any investing activities, regardless of the percentage of revenue derived from it. Policies should include relative thresholds for clients/investees – if several thresholds are available, please use the threshold currently in place for existing clients. The policy should apply to all investments, e.g., not only to ESG-focused funds. The policy should also state whether it is a global policy, or state which divisions of the financial institution the policy applies to. If multiple policies are available, please use the policy that covers the majority of assets (greater percentage of revenues in your business). Policies or policy elements with material exceptions will not be accepted. The only acceptable type of exception to a policy is for companies/projects with time-bound transition plans that are aligned with the Paris Agreement. No, we do not currently invest in any unconventional oil & gas. We expect companies to publicly disclose that they do not invest in or do not have exposure to any fossil fuels. Not applicable: Companies that act as financial service facilitators, such as stock exchanges, index licensors, and data providers can/should mark this question as “Not applicable” and provide a brief explanation in the comment box. References This question refers to the SBTI Guidance for the Financial Sector, the UNEP-FI Guidelines for Climate Target Setting for Banks.

2.5.8 MSA Decarbonization Strategy

In this section we include a performance score on the Corporate Sustainability Monitoring with the objective to verify the company's involvement and management of crisis situations that can have a damaging effect on reputation. The evaluation will be filled in by the responsible analyst of your industry. No additional information is required from your company.

Info Text:
Based on a Media and Stakeholder Analysis (MSA), the consistency of a company’s behavior and management of crisis situations is reviewed in line with its stated principles and policies. Results of the MSA range from no impact to high impact - the latter reflecting serious reputational risks with consequences on the company's bottom line (e.g. legal liabilities or high probability of imminent legal liabilities). In addition, the overall quality of the management response to a situation is assessed, evaluating whether a company has transparently and proactively managed the issue.

3 Social Dimension

3.1 Labor Practices

Employees represent one of a company's most important assets. Maintaining good relations with employees is essential for the success of businesses' operations, particularly in industries characterized by organized labor. Beyond providing a safe and healthy working environment, companies should support fair treatment practices such as guaranteeing diversity, ensuring equal remuneration and supporting freedom of association. In accordance with international standards on labor and human rights, companies are increasingly expected to adhere to and apply these standards equally across all operations within the organization. Furthermore, growing customer awareness leads to higher expectations from companies in their role as global corporate citizens and their ability to drive sustainable business practices forward.
The key focus of the criterion is on gender diversity in management, equal remuneration, and freedom of association.

3.1.1 Discrimination & Harassment

This question requires publicly available information.

Does the company have a policy on non-discrimination and anti-harassment at a group level and is it available publicly?

- Yes, the company has a group-wide policy on non-discrimination and anti-harassment and it covers the following measures. Please indicate where this information is available in public reporting or corporate website.
  - Explicit statement prohibiting harassment:
    - Sexual harassment
    - Non-sexual harassment
  - Zero tolerance policy for discrimination
  - Trainings for all employees on discrimination or harassment in the workplace
  - Defined escalation process for reporting incidents specific to discrimination and/or harassment
  - Corrective or disciplinary action taken in case of discriminatory behavior or harassment

- No, the company does not publicly report on a group-wide policy for non-discrimination and anti-harassment.

- Not applicable. Please provide explanations in the comment box below.

Info Text:

Question Rationale The purpose of this question is to evaluate the quality of the company's non-discrimination and anti-harassment policy. According to the International Labor Organization (ILO), discrimination based on the mentioned identity markers is a violation of human and labor rights. Furthermore, diverse companies with strong non-discriminatory practices have been proven to perform better in terms of innovation, efficiency, productivity, employee engagement, and talent attraction and retention, thus making anti-discrimination practices a key strategic topic for companies.

Key Definitions

Discrimination: Discrimination is defined as the act and the result of treating people unequally by imposing unequal burdens or denying benefits, instead of treating each person fairly on the basis of individual merit. Discrimination can also include harassment.

Harassment: Harassment is defined as a course of comments or actions that are unwelcome, or should reasonably be known to be unwelcome, to the person towards whom they are addressed. Non-sexual harassment includes but is not exclusive to mobbing and bullying, while sexual harassment includes a sexual component.

Zero tolerance: Zero-tolerance policies against harassment and discrimination dictate that any allegations are taken seriously and handled confidentially and sympathetically. If allegations are confirmed, remedial action, disciplinary action, dismissal, or legal action will be taken.

Defined escalation process: System consisting of specific procedures, roles, and rules for receiving complaints and providing remedy. Grievance mechanisms are also accepted here. It should be specified in the company's public domain that discrimination and harassment incidents are to be reported through the defined escalation process.

Corrective action: Corrective action is a process of communicating with the employee and taking active measures to improve unacceptable behavior.

Disciplinary action: A disciplinary action is a reprimand or corrective action in response to employee misconduct, rule violation, or poor performance. Depending on the severity of the case, a disciplinary action can take different forms, including a verbal warning, a written warning, a poor performance review or evaluation, a reduction in rank or pay, and termination.

Data Requirements This question requires publicly available information. We expect companies to have a statement explicitly prohibiting both sexual and non-sexual harassment. We expect the company's policies and measures to be explicitly relevant to discrimination and harassment. A simple mention of discrimination in the Codes of Conduct is not considered sufficient. If discrimination and harassment are included in trainings, escalation processes, and disciplinary actions together with other breaches of the Codes of Conduct, it should be mentioned that each aspect also covers discrimination and harassment specifically. Please note: If you have less than 100 employees or no...
3.1.2 Workforce Breakdown: Gender

Additional credit may be granted for publicly available evidence.

Does your company monitor the following indicators regarding workforce gender diversity? If so, please complete the table. Please provide the coverage reported on as a percentage of FTEs and attach supporting public evidence where indicated if available. Please also indicate whether you have set a public target for women representation. We expect companies to have set at least one public target for one representation level in order to meet our requirements for the targets. We do not expect companies to have targets for each level of representation.

- Yes, we monitor the following indicators:
- Please select the coverage of the data reported on as a % of FTEs:
  - >75% of FTEs
  - 50-75% of FTEs
  - 25-50% of FTEs
  - <25% of FTEs

<table>
<thead>
<tr>
<th>Diversity Indicator</th>
<th>Percentage (0 - 100 %)</th>
<th>Public Target</th>
</tr>
</thead>
<tbody>
<tr>
<td>Share of women in total workforce (as % of total workforce)</td>
<td>Public reporting available:</td>
<td>Target year:</td>
</tr>
<tr>
<td>Share of women in all management positions, including junior, middle and top management (as % of total management positions)</td>
<td>Public reporting available:</td>
<td>Target year:</td>
</tr>
<tr>
<td>Share of women in junior management positions, i.e. first level of management (as % of total junior management positions)</td>
<td>Public reporting available:</td>
<td>Target year:</td>
</tr>
<tr>
<td>Share of women in top management positions, i.e. maximum two levels away from the CEO or comparable positions (as % of total top management positions)</td>
<td>Public reporting available:</td>
<td>Target year:</td>
</tr>
<tr>
<td>Share of women in management positions in revenue-generating functions (e.g. sales) as % of all such managers (i.e. excluding support functions such as HR, IT, Legal, etc.)</td>
<td>Public reporting available:</td>
<td>Target year:</td>
</tr>
<tr>
<td>Share of women in STEM-related positions (as % of total STEM positions)</td>
<td>Public reporting available:</td>
<td>Target year:</td>
</tr>
</tbody>
</table>
Info Text:
Question Rationale We assess various Labor KPIs of an organization to determine not only the quality, but also the transparency of its reporting on diversity issues. Gender diversity can improve a company’s performance as it increases the likelihood of bringing people with different types of knowledge, views and perspectives together. This diversity results in better innovative and problem-solving skills, improves talent attraction and retention, increases employee engagement and results in higher efficiency. Several initiatives have already been taken by shareholders and governments to increase the share of women in the workforce and in leadership positions. Companies who are early adopters of inclusive hiring and retention practices will therefore benefit from positive recognition and lower compliance costs in the future. This question specifically assesses workforce gender diversity by asking about the proportion of women at different levels of responsibility. We expect companies to also commit to gender balance across the talent pipeline by setting targets for the levels of representation where they face the greatest challenges. This question looks at the companies’ ability to disclose this data, as well as its performance compared to its industry peers and its ability to retain women talent. Key Definitions The definitions provided below are guidelines that should be followed as closely as possible. If a different definition is used, this should be explained accordingly and a consistent definition should be used in any other questions that may require information about organizational structures. Gender identity: Each person’s deeply felt internal and individual experience of gender, which may or may not correspond to the sex assigned at birth, including the personal sense of the body (which may involve, if freely chosen, modification of bodily appearance or function by medical, surgical or other means) and other expressions of gender, including dress, speech and mannerisms (European Institute for Gender Equality). In this question, we refer to employees who self-identify as women, i.e., who consider their gender identity to be woman. Management positions: This refers to all levels of management, including junior, middle and senior level management. Junior management positions: refer to first-line managers, junior managers and the lowest level of management within a company's management hierarchy. These individuals are typically responsible for directing and executing the day-to-day operational objectives of organizations, conveying the directions of higher level officials and managers to subordinate personnel. Middle management positions: refer to managers who head specific departments (such as accounting, marketing, production) or business units, or who serve as project managers in flat organizations. Middle managers are responsible for implementing the top management's policies and plans and typically have two management levels below them. Top management positions: refer to management positions with a reporting line at most two levels away from the CEO. They include individuals who plan, direct, and formulate policies, set strategy, and provide the overall direction of enterprises/organizations for the development and delivery of products or services, within the parameters approved by boards of directors or other governing bodies. Revenue-generating functions: refer to line management roles in departments such as sales, or that contribute directly to the output of products or services. It excludes support functions such as HR, IT, Legal. May also be referred to as roles that have P&L responsibility. STEM: Science, technology, engineering and mathematics. STEM workers use their knowledge of science, technology, engineering or mathematics in their daily responsibilities. To be classified as a STEM employee, the employee should have a STEM-related qualification and make use of these skills in their operational position. Positions include, but are not limited to, the following: Computer programmer, web developer, statistician, logisticiant, engineer, physicist, scientist. Coverage: The coverage corresponds to the scope of the data reported on. For example, if a company only reports on its employees in one country, and these employees represent X% of the total workforce, then the company should select the bracket which includes this X%. Please use a consistent coverage for all indicators. Data Requirements Disclosure requirements for partially public question. Additional credit will be granted for relevant publicly available evidence covering each of the following aspects of this question: - Women in the total workforce - Women in all management positions - Women in junior management positions - Women in top management positions - Women in revenue-generating positions - Women in STEM-related positions We expect companies to have set at least one public target for one representation level in order to meet our requirements for the targets. We do not expect companies to have public targets for each level of representation, but only for one level. This target needs to be publicly available or will not be considered as relevant in the scoring of this question. Please note: If you have less than 100 employees or no employees in your organization, then please mark the question as “Not applicable”. References - The gender equality questions were developed in collaboration with EDGE, leveraging its robust research on gender equality. EDGE is the leading global assessment methodology and business certification standard for gender equality. It measures where organizations stand in terms of gender balance across their pipeline, pay equity, effectiveness of policies and practices to ensure equitable career
flows as well as inclusiveness of their culture. Launched at the World Economic Forum in 2011, EDGE has been designed to help companies not only create an optimal workplace for women and men, but also benefit from it. EDGE stands for Economic Dividends for Gender Equality and is distinguished by its rigor and focus on business impact. EDGE Certification’s diverse customer base consists of 200 large organizations in 44 countries across five continents, representing 29 different industries and employing globally more than 2.4 million employees - ILO convention No. 111

3.1.3 Workforce Breakdown: Race/Ethnicity & Nationality

Additional credit may be granted for publicly available evidence.

Does your company provide a breakdown of its workforce according to racial and ethnic self-identifications, or nationality? Please refer to the information button for further guidance on which option to select. Please provide the coverage reported on as a percentage of FTEs and attach supporting public evidence where indicated if available.

悯 At least 20% of our workforce is based in the US and we monitor the breakdown of our workforce according to ethnic and racial indicators.

Please select the coverage of the data reported on as a % of FTEs:

悯 >75% of FTEs
悯 50-75% of FTEs
悯 25-50% of FTEs
悯 <25% of FTEs

<table>
<thead>
<tr>
<th>Breakdown</th>
<th>Share in total workforce (as % of total workforce)</th>
<th>Share in all management positions, including junior, middle and senior management (as % of total management workforce)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Asian</td>
<td></td>
<td></td>
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<tr>
<td>Black or African American</td>
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<td></td>
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<tr>
<td>Hispanic or Latino</td>
<td></td>
<td></td>
</tr>
<tr>
<td>White</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Indigenous or Native</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other, please specify:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

悯 This information is publicly available. Please provide supporting evidence:

悯 Less than 20% of our workforce is based in the US and we monitor the breakdown of our workforce according to under-represented and structurally disadvantaged ethnic and racial minorities. If you are not able or allowed to provide such a breakdown, please report on the breakdown of your workforce based on nationality. Please fill in the table below with the relevant categories used.

悯 We report on the breakdown of our workforce based on ethnic and racial minorities. Please specify the ethnic and racial categories in the table below.

悯 We are not able or allowed to report on ethnic and racial minorities, and therefore provide a breakdown based on nationality. Please specify the nationalities which make up the highest percentage of your workforce in the table below.

悯 This information is publicly available. Please provide supporting evidence:

Please select the coverage of the data reported on as a % of FTEs:

悯 >75% of FTEs
<table>
<thead>
<tr>
<th>Breakdown based on, please specify:</th>
<th>Share in total workforce (as % of total workforce)</th>
<th>Share in all management positions, including junior, middle and senior management (as % of total management workforce)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category name:</td>
<td></td>
<td></td>
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<tr>
<td>Category name:</td>
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<td>Category name:</td>
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<tr>
<td>Category name:</td>
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</tr>
</tbody>
</table>

- No, we do not monitor the breakdown of our workforce according to ethnic or racial minorities.
- Not applicable. Please provide explanations in the comment box below.
- Not known

**Info Text:**
Question Rationale Provisions on equality and non-discrimination are enshrined in international human rights law and in the constitutions and legislations of most countries. Nonetheless, many people continue to face prejudice, harassment, and discrimination because of their ethnic or racial origins. According to the OECD, the collection of accurate and comprehensive data on diversity is therefore central to providing information on the racial and ethnic breakdown to implementing, monitoring, and evaluating practices and policies that aim to address disadvantages and promote equal opportunities in all sectors of society. To achieve the optimum mix of skills, backgrounds, and experience, workforce diversity needs to go beyond discussing the percentage of women to also include other diversity indicators. Collecting and analyzing data on racial and ethnic diversity is difficult but not impossible. This question seeks to encourage companies to measure the racial and ethnic composition of their workforce in order to understand whether it fairly represents the broader demographic composition of their geographical locations. Collecting and disclosing this data is key to identifying any practices of discrimination or unequal opportunities and provides an important indicator to shareholders that diversity and inclusion are considered as high on the corporate agenda. Indeed, the attention of shareholders and regulatory agencies is now expanding to include diversity factors such as ethnic and racial diversity. Companies that are early adopters of inclusive hiring and retention practices and are transparent about these indicators will therefore benefit from positive recognition and lower compliance costs in the future. Key Definitions Self-identification: This refers to the assigning of a particular characteristic or categorization to oneself. In this question, we ask for the proportion of employees who self-identify as such, meaning that they have expressed their identification with this characteristic rather than having been assigned it by others based on physical or other attributes. Structurally disadvantaged racial and ethnic minorities: Minorities that experience a higher risk of poverty, social exclusion, discrimination, and violence than the general population, based on race or ethnicity. Structural disadvantage refers to disadvantages experienced as a result of the way society functions, for example how institutions are organized, who has power, how resources are distributed,
how people relate to each other, etc. This question focuses on such minorities. Race: In the absence of any internationally agreed definition, race is most often statistically characterized in terms of phenotype and appearance (e.g., skin color), or with regard to ancestry. This should not be understood as an attempt to trace the definition of race to biological, anthropological, or genetic factors but rather to (somewhat artificially) distinguish it from the concept of ethnicity. (OECD, 2018) Ethnicity: Describes a shared culture: the practices, values, and beliefs that characterize those belonging to a community. This multidimensional concept acts as an umbrella term encompassing language, religious traditions, and others (United Nations, 2017). A number of related concepts, including ancestry, citizenship, and nationality, may overlap with ethnicity. However, ethnicity is not the same as nationality or citizenship, nor it is a measure of biology or genes. (OECD, 2018)

Indigenous identity: While no universal definition exists in international law, the term is used to refer to “tribal peoples whose social, cultural and economic conditions distinguish them from other sections of the national community, and whose status is regulated (wholly or partially) by their own customs or traditions or by special laws or regulations; and to peoples in independent countries who are regarded as indigenous on account of their descent from the populations which inhabited the country (or a geographical region thereof) at the time of conquest, colonization or establishment of present state, and who, irrespective of their legal status, retain some or all of their own social, economic, cultural and political institutions” (ILO, 1989). Migrant background/origin: A person who has migrated into their present country of residence; and/or previously had a different nationality from their present country of residence; and/or at least one of their parents previously entered their present country of residence as a migrant (European Commission). In some countries, migrant origins are used as a proxy for ethnicity. Foreign origin: A person who was born outside of the country of residence; and/or holds another nationality from their present country of residence; and/or at least one of their parents were born outside of the country of residence or hold nationality from another country. In some countries, foreign origins are used as a proxy for ethnicity. Nationality: Generally defined as being a member of a given state. Nationality can be acquired by birth or adoption, marriage, descent, or naturalization. Based on international conventions, every sovereign state is entitled to determine who can be a national of their country. Coverage: The coverage corresponds to the scope of the data reported. For example, if a company only reports on its employees in one country, and these employees represent X% of the total workforce, then the company should select the bracket which includes this X%. If the company gave the opportunity to self-report to its employees, but a proportion of these employees have actively decided to refrain from providing this personal data, the proportion of these employees can still be included as part of the coverage. Data Requirements: In Europe, according to Article 9 of the GDPR, it is prohibited to process personal data revealing racial or ethnic origin, except if the data subject has given explicit consent to the processing of those personal data, provided this is not prohibited by national law. Other exemptions exist, such as reasons of substantial public interest which might include statistical research purposes for equality of opportunity and treatment. However, if as a result, your company does not collect racial or ethnic data, please report on the nationalities which make up the highest percentage of your employees, providing the name of each nationality in each “category name” text box. “Not applicable” will not be accepted, as we expect companies to report on the breakdown of nationalities. We expect companies to report on at least three different categories (racial or ethnic categories, or nationalities) in order to score full points for this question. The coverage provides an indication of the scope of the data reported on but is not considered in the scoring of this question as we recognize that the data is complex to consolidate at the global level. Disclosure requirements for partially public question: Additional credit will be granted for relevant publicly available evidence covering at least one level of responsibility for at least three minority groups. If your company has more than 20% of its workforce in the US, then we require you to select the first option and report according to the categories defined in the table. We expect public disclosure in at least three categories. If more than 20% of your workforce is in the US, but you also have employees in other parts of the world, please select the coverage bracket which covers your employees in the US. You will not be penalized for not reporting on the full coverage of your FTEs as we recognize that the data is complex to consolidate at the global level. If your company has less than 20% of its workforce in the US, please select the second option and fill in the table according to the relevant categories for the highest share of your workforce. We expect public disclosure in at least three categories. Please select the coverage bracket which covers the scope of employees you are reporting on. You will not be penalized for not reporting on the full coverage of your FTEs as we recognize that the data is complex to consolidate at the global level. If your company has less than 20% of its workforce in the US and you are unable or not allowed to report on ethnic and racial indicators, please select the second option and report on the nationalities which make up the highest share of your workforce. Please note that this is not the preferred option as nationality is an imperfect proxy for the diversity indicator assessed in this question. We do not accept disclosure on the geographical spread of the workforce, here we refer to the nationalities of the employees rather than their geographical location. We expect disclosure on at least three different
nationalities. Please note: If you have less than 100 employees or no employees in your organization, then please mark the question as “Not applicable”. References ILO convention No. 111 GDPR Article 9

3.1.4 Gender Pay Indicators

Additional credit may be granted for publicly available evidence.

Does your company monitor and disclose the results of your gender pay gap or equal pay assessment? If your company conducts both, please select the option with the highest coverage.

☐ We monitor and disclose the results of our equal pay analysis.

Currency:

☐ >75% of FTEs
☐ 50-75% of FTEs
☐ 25-50% of FTEs
☐ <25% of FTEs

<table>
<thead>
<tr>
<th>Employee Level</th>
<th>Average Women Salary</th>
<th>Average Men Salary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive level (base salary only)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Executive level (base salary + other cash incentives)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Management level (base salary only)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Management level (base salary + other cash incentives)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non-management level (base salary only)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

☐ If the equal pay information (or the ratios) is publicly reported, please provide the relevant URL.

☐ Our equal pay assessment is third-party verified. Please provide supporting evidence:

☐ We monitor and disclose the results of our gender pay gap analysis.

☐ If the gender pay gap information is publicly reported, please provide the relevant URL.

Please provide the coverage reported on (as a % of FTEs):

☐ >75% of FTEs
☐ 50-75% of FTEs
☐ 25-50% of FTEs
☐ <25% of FTEs

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Difference between men and women employees (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mean gender pay gap</td>
<td></td>
</tr>
<tr>
<td>Median gender pay gap</td>
<td></td>
</tr>
<tr>
<td>Mean bonus gap</td>
<td></td>
</tr>
<tr>
<td>Median bonus gap</td>
<td></td>
</tr>
</tbody>
</table>

☐ Our gender pay gap assessment is third-party verified. Please provide supporting evidence:

☐ We conduct gender pay assessments but do not disclose the results. Please provide supporting qualitative evidence:
We do not conduct gender pay assessments.
Not applicable. Please provide explanations in the comment box below.
Not known

Info Text:
Question Rationale This question assesses a company’s pay practices by evaluating the results of its gender pay assessments. An increasing number of countries are adopting regulations which require companies to conduct such pay assessments and to disclose the results, making this topic of high strategic importance. Furthermore, unequal remuneration and gender pay gaps pose a threat to a company’s ability to attract and retain women talent, lowers employee engagement, and can lead to reputationally damaging controversies.

Key Definitions
Executive level: Employees who have an executive function and play a strategic role within an organization. They hold senior positions and impact company-wide decisions. Executives usually report directly to the CEO, and the CEO is included in the definition of executive level.
Management level: All management-level positions from first-line/junior managers up to top/senior managers with a reporting line 2 levels or less from the CEO, but excluding executive-level positions.
Non-management level: Employees in charge of executionary functions, such as production and administrative positions. These employees have limited or no managerial role.
Other cash incentives: These are monetary incentives paid on top of the employee’s regular salary to reward employees for job performance or longevity. These incentives have an explicit monetary value and can include rewards such as bonuses and stock options.
Equal pay: Equal pay compares the salary of men and women who have the same or equivalent positions to assess whether they are paid the same for equal work.
Gender pay gap: The gender pay gap is the difference in average gross hourly earnings between women and men – it therefore assesses the difference in pay at the aggregated level. Calculated this way, the gender pay gap does not take into account all the different factors that may play a role, for example, education, hours worked, type of job, career breaks, or part-time work. However, it reflects the work that women do and their position in the company hierarchy, therefore also providing an indicator of equality of opportunities to develop one’s career and access higher-paid positions.
Mean gender pay gap: The difference between the mean hourly rate of pay of male full-pay relevant employees and that of female full-pay relevant employees.
Median gender pay gap: The difference between the median hourly rate of pay of male full-pay relevant employees and that of female full-pay relevant employees.
Mean bonus gap: The difference between the mean bonus paid to male relevant employees and that paid to female relevant employees.
Median bonus gap: The difference between the median bonus paid to male relevant employees and that paid to female relevant employees.
Coverage: Please select the coverage range on which you are reporting. For example, if you are reporting on your employees in country ABC, and these employees make up 80% of your total workforce, please select the coverage range “>75%”.
Data Requirements Disclosure requirements for partially public question: Additional credit will be granted for relevant publicly available evidence disclosing the metrics requested either for equal remuneration or for the gender pay gap. If your company conducts both equal pay and gender pay gap assessments, please select the option for which you have data for the highest proportion of your employees. Please note: If you have less than 100 employees or no employees in your organization, then please mark the question as “Not applicable”.
References
International standards: ILO convention No. 111 The gender equality questions were developed in collaboration with EDGE, leveraging its robust research on gender equality. EDGE is the leading global assessment methodology and business certification standard for gender equality. It measures where organizations stand in terms of gender balance across their pipeline, pay equity, effectiveness of policies and practices to ensure equitable career flows as well as inclusiveness of their culture. Launched at the World Economic Forum in 2011, EDGE has been designed to help companies not only create an optimal workplace for women and men but also benefit from it. EDGE stands for Economic Dividends for Gender Equality and is distinguished by its rigor and focus on business impact. EDGE Certification’s diverse customer base consists of 200 large organizations in 44 countries across five continents, representing 29 different industries and employing globally more than 2.4 million employees. The study “Do Firms Respond to Gender Pay Gap Transparency?” (January 2019) examined the effect of pay transparency on the gender pay gap and firm outcomes by examining a 2006 policy change in Denmark that required firms to provide gender dis-aggregated wage statistics. Using detailed data and a differences-in-differences statistical approach, Bennedsen et al. found that the law indeed reduced the gender pay gap.
This question requires publicly available information.

What percent of your total number of employees are represented by an independent trade union or covered by collective bargaining agreements? Please indicate where this is available in your public reporting.

Please note: employees who are eligible but are not actually covered by collective bargaining agreements should be excluded from the count.

% of employees represented by an independent trade union or covered by collective bargaining agreements: Link to public reporting

We do not track freedom of association metrics.

Not applicable. Please provide explanations in the comment box below.

Info Text:

Question Rationale We assess various Labor KPIs at an organization to determine the quality and transparency of its reporting. In line with ILO Convention No. 87 and No. 98, this question assesses if your company allows employees to join an independent trade union. Key Definitions Collective bargaining agreements: Written legal contracts between an employer and a union representing the employees. These agreements can be at the sector, national, regional, organizational, or workplace level. An independent trade union: A trade union which is not under the control of an employer or group of employers or of one or more employers' associations, and is free from interference by an employer or any such group or association. Data Requirements Percentage of employees covered by collective bargaining agreements: Employees who are eligible but are not actually covered by collective bargaining agreements should be excluded from the count. This question requires public evidence. Please note: If you have less than 100 employees or no employees in your organization, then please mark the question as “Not applicable”.

3.1.6 MSA Labor Practices

In this section we include a performance score on the Corporate Sustainability Monitoring with the objective of verifying the company's involvement and management of crisis situations that can have a damaging effect on reputation. The evaluation will be filled in by the responsible analyst of your industry. No additional information is required from your company.

Info Text:

Based on a Media and Stakeholder Analysis (MSA), the consistency of a company’s behavior and management of crisis situations is reviewed in line with its stated principles and policies. Results of the MSA range from no impact to high impact - the latter reflecting serious reputational risks with consequences on the company’s bottom line (e.g. legal liabilities or high probability of imminent legal liabilities). In addition, the overall quality of the management response to a situation is assessed, evaluating whether a company has transparently and proactively managed the issue.

3.2 Human Rights

The questions in this criterion aim to assess whether or not companies are meeting the implementation requirements of the UN guiding principles for business and human rights.

3.2.1 Human Rights Commitment
This question requires publicly available information.

Does the company have a policy on its commitment to respect human rights at a company-wide level and is it available publicly?

- Yes, the company has policy on its commitment to respect human rights at a company-wide level. Please indicate where this information is available in public reporting or corporate website.
  - A statement of commitment to respect human rights in accordance with internationally accepted standards
  - A statement of commitment to prevent/respect at least:
    - human trafficking
    - forced labor
    - child labor
    - freedom of association
    - the right to collective bargaining
    - equal remuneration
    - discrimination
    - other rights

  The policy also covers the following:
  - Requirements for our own operations (employees, direct activities, products or services)
  - Requirements for our suppliers
  - Requirements for our partners

- No, the company does not publicly report on its commitment to respect human rights at a company-wide level.

- Not applicable. Please provide explanations in the comment box below.

Info Text:
Question Rationale The purpose of this question is to identify companies that have an active commitment to respect human rights in their business relationships in line with the UN Guiding Principles or another internationally accepted standard. The policy needs to be company-specific with a company-wide commitment and not just for a single site, business unit, or project. Following the most recent international developments in the field of corporate non-financial disclosures, we want to know not only the coverage of business human rights policies but what are the specific human rights issues considered within them and whether they highlight particular human rights for attention, whether the commitment is limited to a particular set of rights, encompasses all internationally recognized human rights, or encompasses all internationally recognized human rights but highlights some as needing particular attention according to the context in which the company operates. This input will reinforce the understanding of a company’s approach to human rights, building increased trust with different stakeholders and demonstrating international good business practices. Key Definitions Respecting human rights: - Avoid causing or contributing to adverse human rights impacts through their own activities, and address such impacts when they occur - Seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products, or services by their business relationships, even if they have not contributed to those impacts. Suppliers: Include brokers, consultants, contractors, distributors, franchisees or licensees, home workers, independent contractors, manufacturers, primary producers, sub-contractors, and wholesalers. Partners: Include agents, lobbyists and other intermediaries, joint venture and consortia partners, governments, customers, clients, and local communities. Human trafficking: The recruitment, transport, transfer, harboring, or receipt of a person by such means as threat or use of force or other forms of coercion, abduction, fraud, or deception for the purpose of exploitation. Forced labor: Forced labor can be understood as work that is performed involuntarily and under the menace of any penalty. It refers to situations in which persons are coerced to work through the use of violence or intimidation, or by more subtle means such as manipulated debt, retention of identity papers, or threats of denunciation to immigration authorities. Child labor: Work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that: - is mentally, physically, socially, or morally dangerous and harmful to children; and/
or - interferes with their schooling by depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work. Freedom of association: The right of workers and employers to form and join organizations of their own choosing Right to collective bargaining: The right of workers to bargain freely with employers is an essential element in freedom of association. Collective bargaining is a voluntary process through which employers and workers discuss and negotiate their relations, in particular terms and conditions of work. Equal remuneration: This means the principle of equal remuneration for men and women workers for work of equal value. Right to non-discrimination: The principle of non-discrimination seeks “to guarantee that human rights are exercised without discrimination of any kind based on race, color, sex, language, religion, political or other opinion, national or social origin, property, birth or other status such as disability, age, marital and family status, sexual orientation and gender identity, health status, place of residence, economic and social situation. Data Requirements This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications) or corporate website. Only referring to or being a signatory to external entities such as the UN Global Compact (UNGC) or International Labour Organization (ILO) is not sufficient for the statement of commitment. A letter from your company to the UNGC is also not sufficient. We require a company-specific statement of commitment. Also, Modern Slavery Statements won’t be accepted as human rights commitments. References Office of the High Commissioner for Human Rights: https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf Business & Human Rights Resource Center: https://www.business-humanrights.org/en/big-issues/un-guiding-principles-on-business-human-rights/ UN Global Compact guide to developing a policy: https://www.unglobalcompact.org/docs/issues_doc/human_rights/Resources/HR_Policy_Guide_2nd_Edition.pdf

3.2.2 Human Rights Due Diligence Process

This question requires publicly available information.

Does the company have a company-wide human rights due diligence process to proactively identify and assess potential impacts and risks relating to respecting human rights and is it available publicly?

☐ Yes, the company has a company-wide human rights due diligence process. Please indicate where this information is available in public reporting or corporate website.

☐ Risk identification in our own operations

☐ Risk identification in our value chain or other activities related to our business

☐ Risk identification in new business relations (mergers, acquisitions, joint ventures, etc.)

☐ We do a systematic periodic review of the risk mapping of potential issues

Please indicate the issues and vulnerable groups covered or identified in your due diligence risk identification process. Please attach public supporting evidence for all of the aspects covered.

Actual or potential human rights issues covered/identified:
Check all that apply and provide relevant evidence for each issue covered. We expect at least four issues to be covered.

☐ Forced labor

☐ Human trafficking

☐ Child labor

☐ Freedom of association

☐ Right to collective bargaining

☐ Equal remuneration

☐ Discrimination

☐ Others, please specify: 

Groups at risk of human rights issues covered/identified:
Check all that apply and provide evidence for each group covered. We expect at least four groups to be covered.

- Own employees
- Women
- Children
- Indigenous people
- Migrant workers
- Third-party employees
- Local communities
- Others, please specify

- No, the company has yet to conduct any assessments but is developing a human rights due diligence process. Please provide information indicating the status and expected completion date.
- No, the company does not publicly report on its human rights due diligence process.
- Not applicable. Please provide explanations in the comment box below.

**Info Text:**

Question Rationale The purpose of this question is to assess whether your company has a due diligence process to proactively and systematically identify potential human rights impacts and where they could occur. Here we ask about the scope of your due diligence risk identification process, whether it covers only your own operations or also your value chain and other activities, and whether you perform a human rights due diligence process before entering into new business relationships (mergers, acquisitions, joint ventures, etc.). We also focus on the type of issues you’ve specifically addressed when carrying out the due diligence process and what type of vulnerable groups you’ve clearly considered throughout the process. A passive approach such as a whistle-blowing or confidential reporting system is not sufficient for this question. There is an increasing number of studies addressing the link between good corporate performance, human rights, and financial returns. For example, some studies indicate that businesses that properly address human rights issues are likely to have a more productive and more profitable workforce and avoid costly risks. (Baglayan, Basak & Landau, Ingrid & McVey, Marisa & Wodajo, Kebene. Good Business: The Economic Case for Protecting Human Rights, 2018) Key Definitions Adverse human rights impact: An “adverse human rights impact” occurs when an action removes or reduces the ability of an individual to enjoy his or her human rights. Human rights risks: The risks that a company’s operations/activities/products pose to people’s fundamental human rights. Human rights due diligence: Understood as the process through which enterprises can identify, prevent, mitigate, and account for how they address their actual and potential adverse impacts as an integral part of business decision-making and risk management systems. Due diligence can be included within broader enterprise risk management systems, provided that it goes beyond simply identifying and managing material risks to the enterprise itself, to include the risks of adverse impacts related to human rights. Data Requirements Supporting documentation should be recent, provide a clear description of the due diligence process, indicate the coverage of business activities, and demonstrate that it is an ongoing activity. The information should be available in the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications) or corporate website. For the actual or potential human rights issues identified, we expect evidence that some of the listed issues were identified or covered as part of the risk identification process. For the groups at risk, we expect public evidence on the vulnerable groups you have taken into account in the risk identification process (we expect public proof of having considered the specific risks faced by those groups or of having considered them as relevant stakeholders through the process). We do not expect all issues and all groups to be covered. The outcomes of conducting the risk identification process should be provided in the following “Human Rights Assessment” question. A passive approach such as a whistleblowing or confidential reporting system is not sufficient for this question. References OECD Guidelines for Multinational Enterprises, Chapter IV. https://www.oecd.org/daf/inv/mne/48004323.pdf OECD Due Diligence Guidance for Responsible Business Conduct. https://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm
3.2.3 Human Rights Assessment

Has your company conducted an assessment of potential human rights issues across your business activities in the past three years?

- Yes, we have proactively conducted an assessment of potential human rights issues in the last 3 years. Please complete the table below related to the portion of activities assessed, the portion of activities where risks have been identified, and the portion of activities with mitigation actions taken. If any of the business categories are not material to your company, select "Not relevant" and provide an explanation.

If an entity has been assessed multiple times in the last three years, it should only be counted once.

Supporting evidence:

<table>
<thead>
<tr>
<th>Category</th>
<th>A. % of total assessed in last three years</th>
<th>B. % of total assessed (column A) where risks have been identified</th>
<th>C. % of risk (column B) with mitigation actions taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Own Operations (including Joint Ventures where the company has management control)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Please select the basis for reporting (denominator): as a % of</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>FTEs</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Revenues</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clients</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Investment Portfolio</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sites</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Products</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Not relevant</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Contractors and Tier I Suppliers (as a % of contractors or Tier I Suppliers)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Not relevant</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Joint Ventures (including stakes above 10%) (as a % of joint ventures)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Not applicable. We do not have any joint ventures at stakes above 10%.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- No, we have not conducted a human rights assessment in the last three years.
- Not applicable. Please provide an explanation in the comment box below.
Not known

Info Text:
Question Rationale The purpose of this question is to assess the extent your company is proactively identifying where risks are and managing them. The process should consider the country contexts in which the organization operates, the potential and actual human rights impacts resulting from the organization's activities, and the relationships connected to those activities. (source: https://www.unglobalcompact.org/docs/news_events/8.1/human_rights_translated.pdf). Key Definitions Own Operations: Include direct activities, own employees, own sites, own products/services Contractors and Tier I Suppliers: Include brokers, consultants, contractors, distributors, franchisees or licensees, home workers, independent contractors, manufacturers, primary producers, sub-contractors, and wholesalers. Joint ventures (including stakes above 10%): all joint ventures not included in Own Operations as defined above. Percentage of suppliers assessed in the last 3 years: This refers to the number of entities across the different categories of business activities that have been assessed in the last three years, divided by the total absolute number of entities within the different categories of business activities in the current year. If an entity has been assessed multiple times in the last three years, it should only be counted once. Data Requirements For information on their own operations, companies may choose the basis for reporting from the following options: % of FTEs, % of revenues, % of clients, % of investment portfolio, % of sites, or % of products. For information on contractors and Tier I suppliers, the basis for reporting should be the % of contractors and Tier I suppliers. For information on joint ventures, the basis for reporting should be the % of joint ventures. Supporting evidence: No document is required to support your response. You may still provide a reference using the reference clip. This could include examples of the underlying calculations or approaches to data aggregation used to compile the provided quantitative information. References Office of the High Commissioner for Human Rights: https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf Business & Human Rights Resource Center: https://www.business-humanrights.org/en/big-issues/un-guiding-principles-on-business-human-rights/

3.2.4 Human Rights Mitigation & Remediation

This question requires publicly available information.

Does the company have measures to mitigate and remediate the negative impacts of human rights risks and is it available publicly?

- Yes, the company has measures to mitigate and remediate negative impacts of human rights risks. Please indicate where this information is available in public reporting or corporate website.
  - Processes implemented to mitigate human rights risks
  - The number of sites with mitigation plans
  - The type of remediation actions taken

- No, the company does not publicly report on its human rights mitigation and remediation actions.

- Not applicable. Please provide explanations in the comment box below.

Info Text:
Question Rationale The purpose of this question is to know through concrete examples, what the reporting company has done during the reporting period to reduce the likelihood of negative impacts related to each human rights risk and what actions has it taken when the impact has already happened. In assessing human rights impacts, companies will have searched for both actual and potential adverse impacts. Potential impacts should be prevented or mitigated through the horizontal integration of findings across the business enterprise, while actual impacts – those that have already occurred – should be a subject for remediation. Key Definitions Mitigation actions: The mitigation of a negative human rights impact refers to actions taken to reduce the extent of the impact. The mitigation of a human rights risk refers to actions taken to reduce the likelihood that a potential negative impact will occur. Remediation actions: Here they are understood as processes that apply when the company has caused or contributed to a negative human rights impact (an actual violation has already happened) and through which it is able to help ensure that the people who were impacted receive an effective remedy. The remediating action aims to restore individuals or groups that have been harmed by a business’s activities to the situation they would have been in had the impact not occurred. Where this
is not possible, it can involve compensation or other forms of remedy that try to make amends for the harm caused. These outcomes may take a range of forms such as apologies, restitution, rehabilitation, financial or non-financial compensation, and punitive sanctions (whether criminal or administrative, such as fines), as well as the prevention of harm through, for example, injunctions or guarantees of non-repetition. This should not be confused with “remediation” in the context of social audits, where the concept includes and typically focuses on forward-looking actions to prevent non-compliance from recurring. Data Requirements Information should be specifically related to human rights issues, general information on ESG or sustainability would not be accepted unless it concretely states the specific human rights topics considered within a more general approach. We require supporting evidence to be available in the public domain. Note: For the number of sites with mitigation plans, information on the general number of mitigation plans or the number of mitigation plans for operations/business units/business operations/products/investment portfolio/clients will also be accepted. For remediation actions, in case the company has been involved directly or indirectly in a human rights impact, information should be provided on the type of remediation actions taken. The information should always be linked with an existing impact or violation. In case the company has not caused nor contributed to any human rights violation, this should be stated in the public domain. In this case, the option can be ticked as no remediating actions would be expected. Note for companies in BNK, FBN, INS: Number of sites: The number of sites can be interpreted as the number of portfolios, client relationships or products with mitigation actions in place. Mitigation actions: The following types of mitigation actions could also be considered when they specifically refer to human rights in case of indirect involvement in a potential adverse human rights impact: - specific human rights requirements in investment mandates or clear human rights conditions precedent to investments, - due diligence requirements with respect to investee companies, - use of leverage in case of investee company breach of covenants, - exclusions (maintaining a no-go list) of high-risk companies or companies that are in breach/violation of human rights principles, - active engagement with the investee, - divestment decisions. Remediation actions: As for remediation actions, companies within the BNK, FBN, and INS would frequently only be indirectly linked with the adverse impact. In those cases, where the company has not contributed to the impact but is still directly linked to the harm through its business relationships, information about the efforts to persuade the investee company/business relationship to remediate the harm and about its participation in dialogue or mediation processes regarding the remediation of the adverse impact is expected. Also, information about cooperation with judicial and non-judicial mechanisms would be expected for companies involved in judicial or non-judicial proceedings related to human rights issues. Besides, an entity acknowledging the harm suffered and demonstrating efforts to improve its processes to ensure that similar adverse impacts will not reoccur is also acceptable. In addition, information on direct mitigation and remediation actions is expected when the company has directly caused or may have caused an adverse human rights impact. References Doing business with respect for human rights, A guidance tool for companies, 2nd edition, 2016, Shift, Global Compact Network Netherlands, Oxfam. https://www.businessrespecthumanrights.org/image/2016/10/24/business_respect_human_rights_full.pdf

3.2.5 MSA Human Rights

In this section we include a performance score on the Corporate Sustainability Monitoring with the objective of verifying the company's involvement and management of crisis situations that can have a damaging effect on reputation. The evaluation will be filled in by the responsible analyst of your industry. No additional information is required from your company.

Info Text:
Based on a Media and Stakeholder Analysis (MSA), the consistency of a company’s behavior and management of crisis situations is reviewed in line with its stated principles and policies. Results of the MSA range from no impact to high impact - the latter reflecting serious reputational risks with consequences on the company's bottom line (e.g. legal liabilities or high probability of imminent legal liabilities). In addition, the overall quality of the management response to a situation is assessed, evaluating whether a company has transparently and proactively managed the issue.

3.3 Human Capital Management
Human capital can make up a significant part of a company’s intangible assets and for many industries, human capital development is one of the most financially material sustainability factors. Considering the drivers in technological disruption and innovation, demographic shifts, and societal developments, companies need to focus on developing their human capital and make sure that their employees have the necessary skill set needed to perform well and execute the business strategy. To address the skills gap challenge, companies must carefully consider their investments in training, upskilling and reskilling their workforce.

3.3.1 Training & Development Inputs

Additional credit may be granted for publicly available evidence.

Please fill out the following table for the related training & development data for the last fiscal year and attach supporting evidence of where this information is reported.

- Please indicate the percentage of global FTEs the data in the table below represents:
  - > 75% of all FTEs globally
  - 50-75% of all FTEs globally
  - 25-50% of all FTEs globally
  - < 25% of all FTEs globally

<table>
<thead>
<tr>
<th>FY 2023</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Average hours per FTE of training and development</strong></td>
</tr>
<tr>
<td>❑ This data is publicly available. Please provide supporting evidence or web link:</td>
</tr>
<tr>
<td><strong>Average amount spent per FTE on training and development.</strong></td>
</tr>
<tr>
<td>❑ This data is publicly available. Please provide supporting evidence or web link:</td>
</tr>
<tr>
<td><strong>Currency:</strong></td>
</tr>
</tbody>
</table>

DATA BREAKDOWN
We break down the data for either of the KPIs above based on the following categories. Please select any that apply and attach supporting evidence:

- Age group
- Gender
- Management level (e.g. junior/low level, middle, senior/top level management)
- Race, ethnicity, nationality, country of origin, cultural background
- Type of training

- We do not track these metrics related to employee training and development.
- Not applicable. Please provide explanations in the comment box below.
- Not known

Info Text:
Question Rationale To address the skills gap challenge and remain competitive in attracting and retaining talents, companies must carefully assess their investments in training, upskilling, and reskilling their workforce. Training & development can lead to positive outcomes such as reduced turnover, reduced external hiring costs, and a more engaged and committed workforce. This question assesses whether companies are leveraging their current workforce capabilities by investing in their training & development and whether these investments are made fairly across the entire employee base. Key Definitions FTEs: Full-Time Equivalents is the number of working hours that represents one full-time employee during a fixed time period, such as one month or one year. The concept is used to convert the hours worked by several part-time employees into the hours worked by full-time employees. Average hours of training and development per FTE: it refers...
to the total number of hours of training and development provided in the last fiscal year divided by the total number of FTEs. Average amount spent on training and development per FTE: it refers to the total amount spent on training and development in the last fiscal year divided by the total number of FTEs. This figure should not include the “learning and development” team operational cost like that team’s employee salaries. By type of training: Here different types of training may include but are not limited to “on-the-job” training, coaching, mentorship, leadership training, compliance training, cultural diversity training, IT training, OHS training, etc. Data Requirements Please note: If you have 25 or less FTEs in your organization, then please mark the question as “Not applicable”. Disclosure Requirements - Additional credit will be granted for relevant publicly available evidence covering the following aspect of this question: “Average hours of training spent per FTE” and/or “Average amount spent per FTE on training and development programs”. - Difference in coverage of the different KPIs: This question asks for two different KPIs. In case the reporting coverage of these KPIs is different, e.g., a company can provide data for “Average hours of training spent per FTE” for 70% of FTEs, but “Average amount spent per FTE” for only 30% of FTEs, then for consistency reasons, the company should provide data for both KPIs for 30% of FTEs. - Difference between publicly and privately available data: Companies should report information in line with their public reporting. That means in case a company publicly reports on “Average hours of training and development per FTE” for 50% of FTEs but could answer the question with a larger coverage that it is only privately available (e.g., for 100% of FTEs), the company should fill out the question only based on the information publicly reported and hence verifiable. Data breakdown: - Companies can provide data breakdown for either of the two KPIs asked, i.e., “Average hours of training spent per FTE” and/or “Average amount spent per FTE on training and development programs”. - We don’t expect companies to break down the data by all the categories mentioned in the question, but full points for this section will be granted for having a breakdown for at least 2 categories. The purpose of this section is to assess whether companies are able to track these KPIs in a way that allows them to evaluate and reassure fair treatment of all employees. - In Europe, according to Article 9 of the GDPR, it is prohibited to process personal data revealing racial or ethnic origin, except if the data subject has given explicit consent to the processing of those personal data, provided this is not prohibited by national law. Other exemptions exist, such as reasons of substantial public interest which might include statistical research purposes for equality of opportunity and treatment. We therefore expect companies to report on only two different categories in order to not penalize companies that do not report data breakdown on race. - For this section, companies can attach either private or public evidence and we expect to see the specific data broken down by these categories, e.g., “x% average hours of training spent per FTE” for junior employees, y% for mid-level managers and z% for senior managers.

### 3.3.2 Employee Development Programs

This question requires publicly available information.

Does your company have employee development programs that have been developed to upgrade and improve employee skills? Please indicate where this information is available in your public reporting or corporate website.

For further clarifications on the information asked below, please consult the information text.

Yes, We have employee development programs that have been developed to upgrade and improve employee skills and are publicly available.

<table>
<thead>
<tr>
<th></th>
<th>Program 1</th>
<th>Program 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name &amp; Description of</td>
<td>❑ Please provide description of the program:</td>
<td>❑ Please provide description of the program:</td>
</tr>
<tr>
<td>the program</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Business benefits of</td>
<td>❑ Please describe the business benefits of the program:</td>
<td>❑ Please describe the business benefits of the program:</td>
</tr>
<tr>
<td>the program</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Question Rationale: One of the challenges companies face is to fully understand the positive business and financial effects of investing in employees and whether the investments they are making are having the desired impact on their people and their organizations. This question measures how and to what degree companies can measure the benefits to their businesses of their investments in human capital by describing two examples of employee development programs, demonstrating their benefits to the business, and asking whether companies are able to quantify these benefits. For investors, understanding whether companies are maximizing the benefits of their investments in people can be key to understanding how efficiently capital is deployed across the organization and how companies are making forward-looking, strategic investments in their people. Key Definitions: Employee development programs: these refer to programs that have been developed to enhance or improve your employees’ skills. They can be functional, leadership, on the job-trainings such as leadership or management development programs, young talent development programs, sales training for sales executives, green or black belt certifications, project management training etc. This does not cover programs providing employees with the basic skills they need to carry out their daily work or to help them reach certain minimum requirements, such as mandatory compliance training, annual recertification programs, basic OHS or workplace security training, board training for new board members, training programs that are necessary to bring new employees up to a minimum standard in order to fulfill their job requirements, graduate/trainee or apprenticeship programs. Name & Description of the program: companies are expected to provide specific examples of programs and explain how they can provide business benefits. A general reference to the existence of a Learning Academy or Institute or a purchase of a LinkedIn Learning license is not sufficient. Description of program objective/business benefits: it refers to the benefits that the company derives as a result of providing the training, not the benefits for the employee undertaking the training. Of course, programs may result in benefits to both the company and the employees. This should not be a description of the employee development program but rather an explanation of how the program aids the company’s overall performance or helps it meet its strategic targets. Quantitative impact of business benefits: they refer to either monetary or non-monetary metrics that a company uses to track and measure the impacts of its development programs. These metrics should be directly linked to the employee development program described in terms of a measurable outcome as a relevant indicator of more effective business performance. Examples include but are not limited to quantitative information showing changes in employee engagement, employee turnover, efficiency, productivity, revenue generation cost savings, sales, internal employee promotions, employee retention etc. (i.e., specific statements of x% increase in employee engagement, x% decrease in employee turnover etc.) This does not refer to the number of trainees/participants or any qualitative description of the beforementioned metrics (i.e., statements like “increased number of trainees”, “increase in employee engagement” etc.).

### Info Text:

#### Program 1

<table>
<thead>
<tr>
<th>Quantitative impact of business benefits (monetary or non-monetary)</th>
<th>Please provide quantitative impact of business benefits:</th>
</tr>
</thead>
</table>

**% of FTEs participating in the program**

**Supporting Evidence**

- No, we do not offer any employee development program.
- Not applicable. Please provide explanations in the comment box below.

#### Program 2

<table>
<thead>
<tr>
<th>Quantitative impact of business benefits (monetary or non-monetary)</th>
<th>Please provide quantitative impact of business benefits:</th>
</tr>
</thead>
</table>

**% of FTEs participating in the program**

**Supporting Evidence**

- Not applicable. Please provide explanations in the comment box below.
3.3.3 Human Capital Return on Investment

This question requires publicly available information.

Does the company publicly report the following information on a standard human capital return on investment metric, serving as a global measure of the return of the company’s human capital programs?

- Yes, the company publicly reports on the following human capital return on investment metrics. Please indicate where this information is available in public reporting or corporate website.

<table>
<thead>
<tr>
<th>FY 2020</th>
<th>FY 2021</th>
<th>FY 2022</th>
<th>FY 2023</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Total Revenue, as specified in the &quot;Denominator&quot; question</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Currency:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b) Total Operating Expenses</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Currency:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>c) Total employee-related expenses (salaries + benefits)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Currency:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Resulting HC ROI (a - (b-c)) / c</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Employees, as specified in the &quot;Denominator&quot; question.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- No, the company does not publicly report on human capital return on investment metrics.

- Not applicable. Please provide explanations in the comment box below.

Info Text:
Question Rationale The Human Capital Return on Investment provides a means of measuring a company’s profitability in relation to total employee costs. It is derived by removing non-employee costs from overall operating costs and deriving the resulting operating profitability. This metric provides a view into the degree to which economic value is derived by looking at profitability solely in relation to human capital costs. Key Definitions Total Revenue: it refers to the amount your company has received in revenues before any deductions are made. Total operating expenses: it refers to all the expenses your company has from its operations. It should be in line with accepted financial accounting and reporting standards including everything a company will have defined in its income statement. Total employee-related expenses (salaries + benefits): this includes training and development programs, pensions, hiring, etc., as it covers all costs directly related to employees. Data Requirements - By subtracting Total Operating Expenses (b) less Total employee-related expenses (salaries + benefits) (c) from Total Revenue (a), your company’s profitability prior to human capital costs is calculated. Dividing this figure by Total employee-related expenses (salaries + benefits) (c) then leads...
to the ratio that examines your company’s level of profitability in relation to the total human capital expenses. Supporting evidence: - This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications, separate fuel efficiency strategy document) or corporate website. - Any response that cannot be verified in the attached public document(s) will not be accepted. Please note: - If you have 25 or less FTEs in your organization, then please mark the entire criterion as “Not applicable”. - If you have 26-100 FTEs, then also this questions will be marked as “Not applicable”.

3.3.4 Hiring

Additional credit may be granted for publicly available evidence.

Please indicate the total number of new employee hire rates and the percentage of open positions filled by internal candidates. Please also report the average hiring cost/FTE for the last fiscal year. Please note: The average hiring cost/FTE should specifically relate to the number of employees hired last year, not average cost for all employees.

<table>
<thead>
<tr>
<th></th>
<th>FY 2020</th>
<th>FY 2021</th>
<th>FY 2022</th>
<th>FY 2023</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of new employee hires</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>This data is publicly available. Please provide supporting evidence or web link:</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Percentage of open positions filled by internal candidates (internal hires)</td>
<td></td>
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<tr>
<td>This data is publicly available. Please provide supporting evidence or web link:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average hiring cost/ FTE</td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Currency:</td>
<td></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

DATA BREAKDOWN
We break down the new employee hires and/or internal hires data based on the following categories. Please provide supporting evidence:

- Age group
- Gender
- Management level (e.g. junior/low level, middle, senior/top level management)
- Race, ethnicity, nationality, country of origin or cultural background

- We do not report this information
- Not applicable. Please provide explanations in the comment box below.
Info Text:
Question Rationale: Employees are one of the most important intangible assets for companies. The ability to attract qualified and talented employees, as well as retain and nurture internal talents is pivotal for corporate success. Companies focused on attracting the best talents should not forget about their internal talents who have grown with the company and understand the organization, its mission and culture. Companies need to build organized internal career mobility processes to retain talents and reduce external hiring costs. This question asks for the number of new employee hires, the percentages of positions filled by internal candidates, the hiring cost, and data breakdown by age, gender, race/ethnicity, and management level.

Key Definitions:
- **FTEs (Full-Time Equivalents)**: Is the number of working hours that represents one full-time employee during a fixed time period, such as one month or one year. The concept is used to convert the hours worked by several part-time employees into the hours worked by full-time employees. Total number of new employee hires: refers to the number of new full-time equivalents (FTEs) hired in the reporting year. It should not include internal candidates, i.e., existing employees that have been hired in different positions or internally promoted. Percentage of open positions filled by internal candidates (or internal hires or promotions): refers to the total number of open positions filled by a company's own employees divided by the total number of vacancies in the company in the reporting year. This metric provides a mean of determining the effectiveness of human capital development by providing employees with the skills required for promotion, and it also demonstrates how proactive organizations are in providing their employees with new challenges for growth and development throughout their careers. Average hiring cost/FTE: refers to the average cost of hiring a new full-time equivalent (FTE) in the reporting year. This figure should be calculated based on the costs of hiring all new FTEs in the reporting period and not based on the costs of hiring FTEs who were already at the company before the last fiscal year started. The average hiring cost includes internal and external recruiting costs, e.g., recruiter salaries, interviews, agency fees, advertising, job fairs, travel, and relocation costs.

Disclosure Requirements:
- Additional credit will be granted for relevant publicly available evidence covering the following aspect of this question, for at least the most recent reported year.
- Total number of new employee hires
- Percentage of open positions filled by internal candidates (internal hires)

IMPORTANT if you are prefilling data from previous assessments: Please note that for technical reasons, the data from the fiscal year 2019 is being prefilled in all 4 years for the “percentage of open positions filled by internal candidates” and the “average hiring cost/FTE”. Please make sure to review the prefilled data and update it accordingly for each fiscal year. Duplicated data which is not supported by an explanation in the comment box will be removed.

Data Breakdown:
- We don’t expect companies to break down the data by all the categories mentioned in the question, but full points will be granted for this section for having a breakdown for at least 2 categories. The purpose of this section is to assess whether companies are able to track these metrics in a way to be able to evaluate and reassure fair treatment of all employees. - In Europe, according to Article 9 of the GDPR, it is prohibited to process personal data revealing racial or ethnic origin, except if the data subject has given explicit consent to the processing of those personal data, provided this is not prohibited by national law. Other exemptions exist, such as reasons of substantial public interest which might include statistical research purposes for equality of opportunity and treatment. We therefore expect companies to report on only two different categories, in order to not penalize companies that do not report data breakdown on race. - For this section, companies can attach either private or public evidence and we expect to see the specific quantitative data broken down by these categories Please note: If you have 25 or less FTEs in your organization, then please mark the question as “Not applicable”.

3.3.5 Type of Performance Appraisal

This question requires publicly available information.

Does the company conduct individual and/or team-based performance management appraisals and is this information available publicly?

- Yes, the company has individual and/or team based performance management appraisals. Please indicate where this information is available in public reporting or corporate website.
  - Management by objectives
  - Multidimensional performance appraisal (e.g, 360 degree feedback)
  - Team-based performance appraisal
Agile conversations

Performance Appraisal Frequency:
Please indicate the frequency at which performance appraisals take place, for at least one type of performance appraisal

- Ongoing
- Quarterly/Twice a year
- At least yearly
- Not reported

- No, the company does not publicly report information on its performance appraisals.
- Not applicable. Please provide explanations in the comment box below

Info Text:
Question Rationale The purpose of this question is to assess the various methods that companies use to measure performance and how often performance appraisals take place. This aids the personal development of individual employees and ensures a holistic approach to team management. It also contributes to skills management and to the development of human capital within the organization. Regular performance and career development reviews can also enhance employee satisfaction, which correlates with improved business performance. Key Definitions Employees: Refers to full-time and part-time employees. Management by objectives: Refers to a systematic process in which employees have pre-defined and measurable goals that are set in a collaborative manner on at least a yearly basis together with their line manager and routinely followed up on. Multidimensional performance appraisal: Refers to a system in which the employee's performance is assessed using a variety of inputs, not just the targets set by a manager. This can include an assessment of how the employee meets the values and objectives of the department or company, receiving feedback from their peers, direct reports, and other employees where a "360-degree" view of the employee's performance is provided and/or receiving client or external feedback. Team-based performance appraisal: Refers to a system where employees are assessed as part of a team rather than only as individuals. It is likely that companies will use a two-pronged approach, e.g., team goals and employees' personal goals are set and weighting applied to an individual review and team review. Agile conversations: Agile performance management is an unstructured approach to managing employee performance and development throughout the year as opposed to on an annual or bi-annual basis. It is collaborative, involving regular conversations and continuous feedback. Agile performance management isn’t solely focused on the destination (i.e., an annual performance outcome or rating) — it is more about the process of getting there, which involves regularly re-addressing objectives and barriers to effective performance. Ongoing: Refers to “more than quarterly”. Having a conversation with a superior/manager/senior leader about professional development. These can be formal reviews and regular check-ins. We can also accept this if the company is carrying them out for the first time but with the explicit intention of conducting them on an ongoing basis. Data Requirements Supporting evidence can be provided to support your response. This can be a reference to an integrated report, sustainability report, or weblink. This question requires publicly available evidence covering the following aspects of this question, for at least the most recent reported year. - The type of performance appraisal. - How often a type of performance appraisal was carried out

3.3.6 Long-Term Incentives for Employees

Additional credit may be granted for publicly available evidence.

Does your company provide long-term incentives for employees below the senior management level? Long-term incentive programs are programs tied to an employee's performance. The performance can be measured during one or multiple years. These incentive programs do not include employee benefits (please see the information button definitions for more information).

Please note: senior management includes employees that are at most two management levels from the CEO (or equivalent). Below senior management level refers to all employees that are more than two management levels away from the CEO. If your company uses a different definition for "below senior management level" please provide the definition in your answer.
Long-term incentives for the executive management and/or senior management are not accepted in this question.

- Please describe the following aspects (both):
  1) the type of long-term incentive program (e.g. stock options, restricted stock units, cash incentives, etc.);
  2) the type of employees below the senior management level the program applies to:

<table>
<thead>
<tr>
<th>Public Reporting</th>
<th>Our long-term incentives for employees below the senior management level are on average paid out after:</th>
<th>Please report the percentage of your workforce below senior management level (max. two levels from the CEO) that this program applies to:</th>
<th>Do the long-term incentives include targets associated with sustainability performance? Please explain in the comment box below:</th>
</tr>
</thead>
<tbody>
<tr>
<td>❑ Please provide relevant information below:</td>
<td>❑ Description publicly available</td>
<td>❑ 2 years</td>
<td>❑ 3 years</td>
</tr>
</tbody>
</table>

- No, we do not offer long-term incentive programs for employees below the senior management level.
- Not applicable. Please provide explanations in the comment box below.
- Not known

Info Text:
Question Rationale
Long-term incentive programs can be essential for companies to retain well-qualified employees over time. Such programs serve to orient key decisions throughout the organization around longer-term goals and strategic objectives, giving companies a greater likelihood of success over time. This question assesses the long-term incentive programs the company has in place, the time frame for which performance incentives are paid out, the extent to which these programs apply to employees across the organization, and the extent to which they are associated with sustainability principles. Key Definitions
Long-term incentives: Variable compensation that is tied to the performance of an employee. The performance can be measured during one or multiple years. This can include deferred cash bonuses, stock options, and restricted stock units. Employee benefits, such as pension contributions (whether mandatory or voluntary) or extra vacation days, should not be included as these are not linked to employee performance. Sustainability performance: It can relate to any sustainability goals set by your company, whether they are related to environmental issues, social issues such as occupational health and safety, or any other sustainability issue defined as material by your company. Senior management level: Refers to employees that are within two levels of the CEO as a maximum. “Employees below senior management” thus refers to all employees that are below the "senior management level". Please note that the definition of "senior management level" is up to the company as we allow the company to choose the best definition according to its business plan and company structure. If your definition differs from our definition due to your business model, please explain this in the question. Data Requirements
Average time period for performance: The average pay-out time period on which these incentive programs are based. If different pay-out time periods are used for different employee categories, please use a weighted average of the pay-out time periods for long-term incentive programs that exist. Percentage of your workforce below senior management level (max. two levels from the CEO): Refers to the percentage of employees that are not considered senior management that are part of the long-term incentives program. For example, if your company has 100 employees, 10 are senior management (a maximum of two levels from the CEO in the organizational structure) and 10 employees below senior management are part of the long-term incentives program, then 11% (=10/90*100) of employees below senior management level are covered in the program. Long-term incentives for executive management and/or senior management are not accepted in this question. Please note: If you have 25 or less FTEs in your organization, then please mark the question as “Not applicable”. Disclosure Requirements
Disclosure requirements for partially public questions: Additional credit will be granted for publicly disclosing information on long-term incentive program offered to employees below senior.
3.3.7 Employee Support Programs

This question requires publicly available information.

Does the company have employee support programs to foster employees’ health and well-being in the following areas and are they available publicly?

☐ Yes, the company has employee support programs. Please indicate where this information is available in public reporting or corporate website.

Employee Benefits
☐ Workplace stress management
☐ Sport & health initiatives

Work Conditions
☐ Flexible working hours
☐ Working-from-home arrangements
☐ Part-time working options

Family Benefits
☐ Childcare facilities or contributions
☐ Breast-feeding/lactation facilities or benefits

☐ Paid parental leave for the primary caregiver (please enter total number of paid leave in weeks offered to the majority of your employees):
☐ Paid parental leave for the non-primary caregiver (please enter total number of paid leave in weeks offered to the majority of your employees):
☐ Paid family or care leave beyond parental leave (care for a child, spouse, partner, dependent, parent, sibling, or other designated relation with a physical or mental health condition)

☐ No, the company does not publicly report on employee support programs.

☐ Not applicable. Please provide an explanation in the comment box below.

Info Text:
Question Rationale Employee health and well-being are essential to ensuring employee satisfaction, productivity, and retention. While flexible work arrangements allow employees to adapt their work schedule to their individual needs and personal commitments, paid parental and care leave, as well as childcare facilities and lactation rooms, ensure that employees have the possibility to balance work and care responsibilities. This flexibility and these benefits boost employee morale, increase productivity, reduce absenteeism, and help to attract and retain top talent while reducing turnover. As a result, companies can improve their financial and non-financial performance indicators. This question assesses the company’s programs and policies that aim to foster employee health & well-being. To reward greater flexibility and equality for both caregivers, the question considers the % of parental leave for the non-primary caregiver compared to the total number of weeks provided for the primary caregiver. Key Definitions Workplace stress management: This refers to programs, information, or training offered, targeted at helping employees manage their stress levels. This relates to both work and non-work-related stress. Examples of workplace stress management programs include, for example, meditation classes and other wellness programs or education that aim to help employees reduce stress, and improve mental wellbeing in the workplace. Sport & health initiatives: This refers to programs
or initiatives that help promote the overall health of employees involving physical activity and/or nutrition goals. Such programs could include onsite fitness facilities, virtual exercise classes, fitness tracking and biometrics, or gym reimbursement. Flexible working hours: This refers to a schedule which allows employees to decide when to start and/or finish their workday according to their individual needs. Flexible working hours may give the employee total freedom over their working schedule or may require employee presence for a core set of hours in the day/week and manage the rest of their working hours as best suits them. Working-from-home arrangements: This refers to a working arrangement by which employees can work from their own homes or other locations of their choice outside of the company facilities. Part-time work: Part-time work is a form of employment by which the employee works fewer hours in the week than what is deemed full-time employment. Childcare facilities: This refers to on-site childcare centers or services which allow parents to drop off their children to qualified caregivers during their working hours. Childcare contributions: This refers to the financial support provided to parents specifically designed to ensure that they have access to qualified childcare services to take care of their children during working hours. Breast-feeding/lactation facilities: This refers to a dedicated lactation room or facility so that new mothers can breastfeed or breast-pump for their newborn child. This space should be located at the workplace and offer privacy, comfort, storage, and hygiene. Breast-feeding/lactation benefits: This refers to benefits provided to new mothers to ensure they have the capacity and support to allow them to breastfeed or breast-pump for their newborn child at work. These benefits include, but are not limited to, paid break times for feeding or pumping (15-20 minutes every 2-3 hours depending on individual needs), subsidies for the purchase of portable breast-feeding or breast-pumping equipment. Paid parental leave for the primary caregiver: This refers to paid leave which is offered on top of normal paid vacation time in order to specifically support primary caregivers during pregnancy, after birth or for the adoption or fostering of a child. This paid leave is separate from other types of leave such as sick leave or paid time off. The primary caregiver is the person primarily responsible for the care and upbringing of a child. Paid parental leave for the non-primary caregiver: This refers to paid leave which is offered on top of normal paid vacation time in order to specifically support non-primary caregivers during pregnancy, after birth or for the adoption or fostering of a child. This paid leave is separate from other types of leave such as sick leave or paid time off. A non-primary caregiver is a person with parental responsibility for a child that does not have primary responsibility for the care and upbringing of the child. Paid family or care leave beyond parental leave: This refers to paid leave granted to the employee in order to take care of a spouse, domestic partner, child, dependent, parent, parent-in-law, grandparent, grandchild, sibling or other designated relation when this person has a physical or mental health condition which requires additional care. This is separate from paid parental leave which is granted to parents who have a new child. Data Requirements Disclosure requirements for public questions: Supporting evidence available in the public domain is required for each aspect of this question. Please note: If you have 25 or less FTEs in your organization, then please mark the question as “Not applicable”. References - WELL Certification C08, C09 and C10

3.3.8 Employee Turnover Rate

Additional credit may be granted for publicly available evidence.

Please indicate your company’s total and voluntary turnover rates for the last four years as a percentage of total number of employees in the table below.

<table>
<thead>
<tr>
<th></th>
<th>FY 2020</th>
<th>FY 2021</th>
<th>FY 2022</th>
<th>FY 2023</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total employee turnover rate</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>This data is publicly available. Please provide supporting evidence:</td>
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</tr>
<tr>
<td></td>
<td>FY 2020</td>
<td>FY 2021</td>
<td>FY 2022</td>
<td>FY 2023</td>
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<td>--------------------------------</td>
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</tr>
<tr>
<td>Voluntary employee turnover rate</td>
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<td>❏ This data is publicly available. Please provide supporting evidence:</td>
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</tr>
<tr>
<td>Data coverage (as % of all FTEs globally)</td>
<td></td>
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</tbody>
</table>

**DATA BREAKDOWN**

We break down the data of the total employee turnover rate based on the following categories. Please provide supporting evidence:

- Age group
- Gender
- Management level (e.g. junior/low level, middle, senior/top level management)
- Race, ethnicity, nationality, country of origin or cultural background

- We do not report this information
- Not applicable. Please provide explanations in the comment box below.
- Not known

**Info Text:**

*Question Rationale* People are one of the main drivers of corporate growth and play an essential role in the successful execution of companies' strategies. In this question, we assess both total and voluntary turnover. Total turnover may fluctuate and reflect industry trends or economic cycles. Voluntary turnover is a better indicator to evaluate a company's ability to retain its employees. This indicator may reflect high levels of uncertainty or dissatisfaction among employees or structural organizational changes. High turnover may impact employee productivity and lead to increased costs due to higher expenses for employee recruitment. Finally, it is very important to evaluate turnover patterns by age, gender, or other employee groups as this can be an indication of incompatibility or potential inequity in the workplace.

**Key Definitions**

- **Total employee turnover:** Refers to the proportion of employees who leave an organization over a set period (often a year), expressed as a percentage of the total employees. The figure should be calculated using the total number of employees at the end of the latest reporting year. The total employee turnover rate number should be the sum of the voluntary employee turnover and the involuntary employee turnover rate.
- **Voluntary employee turnover:** Refers to the proportion of employees who choose to leave an organization (such as resignation, retirement, early retirement etc.) over a set period (often a year), expressed as a percentage of the total employees. The figure should be calculated using the total number of employees at the end of the latest reporting year.

**Data Requirements**

- If the company doesn’t have a lot of FTEs because they outsource all their activities to contractors, then contractors are to be considered employees and the question will be applicable.
- If the company's definition of the turnover rates does not match our definition, then mark "Not applicable" for this question.

**Disclosure requirements:**

- Additional credit will be granted for relevant publicly available evidence covering the following aspects of this question, for at least the most recent reported year.
- Voluntary employee turnover rate Data Breakdown: We don’t expect companies to break down the data by all the categories mentioned in the question, but full points will be granted for this section for having a breakdown for at least 2 categories. The purpose of this section is to assess whether companies are able to track these metrics in a way to be able to evaluate and ensure fair treatment of all employees. In Europe, according to Article 9 of the GDPR, it is prohibited to process personal data revealing racial or ethnic origin, except if the data subject has given explicit consent to the processing of those personal data, provided this is not prohibited by national law. Other exemptions exist, such as reasons of substantial public interest which might include statistical research purposes for equality of opportunity and treatment. We therefore expect companies to report on only two different categories, in order to not penalize companies that do not report data breakdown on race. For this section, companies can attach either private or public evidence and we expect to see the specific quantitative data broken down by these categories. Please note: If you have 25
or less FTEs in your organization, then please mark the question as “Not applicable”. - If you have 26-100 FTEs, then also this questions will be marked as “Not applicable”

### 3.3.9 Trend of Employee Wellbeing

**Additional credit may be granted for publicly available evidence.**

Please indicate if your company conducts an employee survey.

- Yes, we conduct an annual employee survey

Please indicate in the following table the percentage of employees that are for example **highly engaged, with highly positive experience or a high level of wellbeing** as found through your company’s scaled employee surveys. Please select only the core focus of your survey as well as its coverage. Please note: If your company only conducts its primary employee survey every two years, please duplicate the value of the previous year in the table and provide the target for the most recent year the primary survey was conducted.

<table>
<thead>
<tr>
<th>Core Focus</th>
<th>Unit</th>
<th>FY 2020</th>
<th>FY 2021</th>
<th>FY 2022</th>
<th>FY 2023</th>
<th>What was your target for FY 2023?</th>
</tr>
</thead>
<tbody>
<tr>
<td>✐ Employee Engagement</td>
<td>% of employees with top level of engagement, satisfaction, wellbeing, or employee net promoter score (eNPS)</td>
<td></td>
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<tr>
<td>✐ Employee Satisfaction</td>
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<tr>
<td>✐ Employee Wellbeing</td>
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<tr>
<td>✐ Employee Net Promoter Score (eNPS)</td>
<td></td>
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</tr>
<tr>
<td>Data coverage</td>
<td>% of employees who responded to the survey</td>
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</tbody>
</table>

**Public Reporting**

- The results of our annual employee surveys are publicly available. Please provide supporting evidence or web link.

In tracking employee metrics, which of the following aspects are addressed in your employee surveys (select all that apply). Please provide supporting evidence.

- Job satisfaction (external motivation, e.g., I am satisfied with my job)
- Purpose (internal motivation, e.g., my work has a clear sense of purpose)
- Happiness (e.g., I feel happy at work most of the time)
- Stress (e.g., I feel stressed at work most of the time)

- No, we do not conduct an annual employee survey.
- Not applicable. Please provide explanations in the comment box below.
- Not known

**Info Text:**

Question Rationale: Employee engagement, satisfaction, and well-being surveys are crucial tools for evaluating employee conditions and developing policies to attract, retain and develop the best employees and identify areas for improvement. In this question, we determine whether companies conduct regular employee surveys...
and in how far metrics on Job satisfaction, Purpose, Happiness and Stress are addressed in the employee surveys. The four aspects Job satisfaction, Purpose, Happiness and Stress have been recommended by the World Wellbeing Movement as evidence-informed employee wellbeing outcome measures developed by the University of Oxford’s Wellbeing Research Centre. They capture the complementary dimensions of wellbeing at work as experienced by the employee and align with how statistical agencies across the OECD are measuring general wellbeing. Research indicates there is a strong link between employee wellbeing and business outcomes such as employee productivity, retention, recruitment, and firm performance. Key Definitions Top level engagement or score: The top level based on a classification where for example “highly engaged” is 7-10 on a 10 point scale, or equivalent. While companies might conduct multiple surveys, in this question we ask for the top level engagement or score only on the core focus of the survey. Depending on the core focus of the survey, top level can refer to the highest category of either engagement, satisfaction, well-being, or top level of employee Net Promoter Score (eNPS). % Of employee survey respondents: Refers to the percentage of FTE employees who responded to the survey. This should not be the percentage of employees invited to participate in the survey. Target: Targets can be the precise, stated target for the year in which the survey was conducted, or if the target is long-term for a specific future year, it can be linearly extrapolated. For instance, if the company reported 70% of employees were engaged or satisfied in FY2020, and set a two-year target of reaching 80% by FY2022, the linearly extrapolated target for FY2021 would be 75% (e.g., 10% improvement divided by two years equals 5% per year). Employee Engagement: definitions of employee engagement may vary, but the following are representative: - Gallup: Those who are involved in, enthusiastic about, and committed to their work and workplace. - Utrecht Work Engagement Scale (UWES-9): “A positive, fulfilling, work-related state of mind that is characterized by vigor, dedication, and absorption.” - Grovo: “A deep, personal, and empowered investment in work.” Deep because the employee cares about the quality of their work. Personal because the work and its contribution to the success of the company matter to the employee. And empowered because “the employee is capable of delivering a quality that will reward their investment of time, talents, effort, and care.” Employee Satisfaction: Refers to external motivation. How happy employees feel about their job; specifically concerning external incentives such as employment benefits. Employee Wellbeing: Gallup: Wellbeing refers to “all of the things that are important to each of us and how we experience our lives. Key wellbeing measures include how employees rate their current and expected future lives (life evaluation) and how strongly employees believe their organization cares about their wellbeing.” Employee Net Promoter Score (eNPS): Refers to the question “on a scale of 0 to 10, how likely would you be to recommend this company to a friend or colleague as a place to work?” Responses which fall in between 9-10 are considered promoters or a company’s most positive, motivated, and satisfied people. Those who fall between 7-8 are passives or employees who are neutral, or generally content but not fully committed to the organization. Employees who answer between 0-6 are considered detractors or those who wouldn’t recommend your company and are unhappy and disengaged to varying degrees. Aspects addressed in employee surveys: The four aspects included in the question involve metrics related to the complementary dimensions of wellbeing at work as experienced by the employee. They align with how statistical agencies are measuring general wellbeing and how Indeed surveys workplace wellbeing. - Job satisfaction: Refers to questions in the survey aiming at measuring evaluative wellbeing (e.g., "I feel completely satisfied with my work") - Purpose: Refers to questions in the survey aiming at measuring eudemonic wellbeing (e.g. "My work has a clear sense of purpose") - Happiness: Refers to questions in the survey aiming at measuring positive affect (e.g., "I feel happy at work, most of the time" - Stress: Refers to questions in the survey aiming at measuring negative affect (e.g., "I feel stressed at work, most of the time") Data Requirements - If your company only conducts an employee survey every two years, please duplicate the value of the previous year in the table and provide the target for the most recent year a survey was conducted - For the employee metric aspects section of the question, companies can attach either private or public evidence, however only information that can be verified will be accepted. Disclosure requirements for partially public question: Additional credit will be granted for relevant publicly available evidence covering the following aspect of this question: - The results of the annual employee survey (i.e., the % of employees with top level of engagement, satisfaction, wellbeing, or employee net promoter score (NPS) figure for at least the most recent reported year). Please note: - If you have 25 or less FTEs in your organization, then please mark the entire criterion as "Not applicable". - If you have 26-100 FTEs, then also this questions will be marked as "Not applicable".

3.3.10 MSA Human Capital Management

In this section we include a performance score on the Corporate Sustainability Monitoring with the objective of verifying the company’s involvement and management of crisis situations that can have a damaging effect on
reputation. The evaluation will be filled in by the responsible analyst of your industry. No additional information is required from your company.

Info Text:
Based on a Media and Stakeholder Analysis (MSA), the consistency of a company’s behavior and management of crisis situations is reviewed in line with its stated principles and policies. Results of the MSA range from no impact to high impact - the latter reflecting serious reputational risks with consequences on the company's bottom line (e.g. legal liabilities or high probability of imminent legal liabilities). In addition, the overall quality of the management response to a situation is assessed, evaluating whether a company has transparently and proactively managed the issue.

3.4 Occupational Health & Safety

Poor occupational health and safety (OHS) performance has a direct negative impact on labor costs through lower productivity. Moreover, it can also affect a company’s reputation, impact staff morale or increase operating costs through fines and other contingent liabilities. Our key questions focus on Key Performance Indicators (KPIs) for a company's own operations, and for its suppliers and their performance against industry benchmarks. Industry-specific questions additionally focus on training, audits and transparency. Industries operating in areas where HIV/AIDS is widespread are also expected to support their employees and minimize the risks of disruption to their business activities.

3.4.1 OHS Policy

This question requires publicly available information.

Does the company have a policy or commitment on Occupational Health and Safety (OHS) and is it available publicly?

- Yes, the company has a policy or commitment on Occupational Health and Safety (OHS). Please indicate where this information is available in public reporting or corporate website.
  - Is applicable to the company’s entire operations/employees as well as contractors or individuals under the company’s supervision.
  - Compliance with relevant OHS international standards and regulations, voluntary programs and/or collective agreements on OHS.
  - Consultation with and participation of workers, and, where they exist, workers’ representatives.
  - A commitment to continually improve the performance of the OHS management system.
  - Setting up prioritization and action plans.
  - Establishment of quantitative targets for improving OHS performance metrics.
  - Endorsement of the implementation of the OHS policy. Please select the highest endorsing decision-making body:
    - Board of directors
    - Executive management

- No, the company does not publicly report on a policy for Occupational Health and Safety.

- Not applicable. Please provide explanations in the comment box below.

Info Text:
Question Rationale The purpose of this question is to identify companies that have an active commitment to occupational health and safety in line with the most relevant international OHS standards. The policy needs to be company-specific with a company-wide commitment and not just for a single site, business unit, or project.
The OHS policy should cover a set of commitments that capture the long-term direction of the organization in terms of health and safety. It sets the company's approach to health and safety and establishes in a clear way what the company's expectations towards employees and other interested parties are. The OHS policy provides an overall commitment, as well as a necessary framework for the organization to set its objectives and take action to achieve the intended outcomes of the OHS management system. The commitments included in the policy are then reflected in the processes companies establish to ensure a robust, credible, and reliable OHS management system. Therefore, an OHS commitment is a precious and necessary step on what to build further measures. The OHS policy should set the direction for effective health and safety management. Board members need to establish a health and safety policy that is much more than a document – it should be an integral part of the organization’s culture, of its values, and performance standards. Data Requirements This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications) or corporate website. Please note: If you have 25 or less FTEs in your organization, then please mark the question as “Not applicable”. References ISO 45001 ILO Occupational Safety and Health Convention, 1981 (No. 155)

3.4.2 OHS Programs

This question requires publicly available information.

Does the company have a program on Occupational Health and Safety (OHS) and is it available publicly?

- Yes, the company has a program on Occupational Health and Safety (OHS). Please indicate where this information is available in public reporting or corporate website.
  - OHS risk and hazard assessments to identify what could cause harm in the workplace.
  - Prioritization and integration of action plans with quantified targets to address those risks.
  - Integration of actions to prepare for and respond to emergency situations.
  - Evaluation of progress in reducing/preventing health issues/risks against targets.
  - Internal inspections.
  - Independent external verification of health, safety and well-being: please provide the names and standards used (such as ISO 45001):

- Procedures to investigate work-related injuries, ill health, diseases and incidents.
- OHS training provided to employees and/or other relevant parties to raise awareness and reduce operational health & safety incidents.
- OHS criteria introduced in procurement and contractual requirements.

- No, the company does not publicly report on programs for Occupational Health and Safety (OHS).
- Not applicable. Please provide explanations in the comment box below.

Info Text:
Question Rationale Poor occupational health and safety (OHS) performance has a direct negative impact on labor costs through lower productivity. Lower performance not only poses a threat to a company’s reputation and staff morale but also results in increased operating costs in the form of fines and other contingent liabilities. With this question, we aim to find out how a company ensures effective management of health risks/ issues and to identify companies that have dedicated programs for Occupational Health and Safety. The OHS programs should cover a set of actions that ensure a robust, credible, and reliable OHS management system. It aims at providing tools to assess and improve performance in the prevention of workplace incidents and accidents via the effective management of hazards and risks in the workplace. Disclosure Requirements This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications) or
3.4.3 Absentee Rate

Additional credit may be granted for publicly available evidence.

Please indicate your company's absentee rate for employees and contractors for the past four years, and indicate if this data is verified by a third party. If so, please provide supporting evidence for the external verification. Please refer to the information button for additional clarifications. For each row in the table, it is mandatory that the values provided are in the unit indicated.

If your company's absentee rate is equal to zero for one or more fiscal years, this data will only be accepted if evidence of third-party verification is provided.

<table>
<thead>
<tr>
<th>Absentee rate</th>
<th>Unit</th>
<th>FY 2020</th>
<th>FY 2021</th>
<th>FY 2022</th>
<th>FY 2023</th>
<th>What was your target for FY 2023?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employees</td>
<td>% of total days scheduled</td>
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<tr>
<td>Data coverage (as % of employees, operations or revenues)</td>
<td>percentage of:</td>
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<td></td>
<td>Employees</td>
<td>Operations</td>
<td>Revenues</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

**PUBLIC REPORTING**

- Our data is publicly available. Please provide supporting evidence or web link.

**THIRD-PARTY VERIFICATION**

- Our data has been third-party verified in the most recent financial year reported. Please provide supporting evidence.

**DATA CONSISTENCY**

- We report publicly on this information, but the data in the table above differs from our publicly reported figures. Please provide an explanation in the comment box for this difference:

- We have a temporary coverage reduction or target challenge due to corporate actions. Please briefly explain if a merger, acquisition, divestment, etc. has temporarily caused a reduction in your ability to report optimal coverage or caused your target to appear abnormal:

- We do not track the absentee rate for employees
- Not applicable. Please provide explanations in the comment box below.
- Not known

**Info Text:**

Question Rationale

Poor occupational health and safety (OHS) performance has a direct negative impact on labor costs through lower productivity. But it can also affect a company’s reputation, impact staff morale, or increase operating costs through fines and other contingent liabilities. With this question, we aim to identify whether a company measures the lost days of its employees due to sickness and injuries. Key Definitions

Please fill in the absentee rate (AR) during the reporting period. Absentee rate (AR): It is based on the total number of days lost due to absenteeism of any kind, not only as a result of work-related injury or disease. This includes individual sick days due to minor illnesses (e.g., the common cold, fevers, and influenza) as well as personal days taken for undisclosed reasons. It does not include scheduled or permitted absenteeism such as holidays, study time, maternity or paternity leave, etc. Please also indicate the data coverage (e.g., as % of
employees, revenues, etc.) Absentee rate calculation: \[
\frac{\text{Number of absentee days in the accounting period}}{\text{Total days scheduled to be worked in the accounting period}} \times 100
\]

Data Requirements

We require the target rate for the most recent reporting year. If your company has a multiple-year and/or relative target, please extrapolate what the target value would have to be for the last financial year to make sure you are progressing well towards achieving the target by the end of the target period. Disclosure requirements for partially public question. Additional credit will be granted for relevant publicly available evidence covering the following aspect of this question: - Absentee rate for at least the most recent reported year. Please note: - If you have 25 or less FTEs in your organization, then please mark the question as “Not applicable”. - If you have 26-100 FTEs, then also this questions will be marked as “Not applicable”. Data Consistency If the occupational health & safety performance data reported in the questionnaire do not correspond to the publicly reported figures, the corresponding option should be marked and the discrepancy should be explained. This option should not be indicated if the information is not publicly reported at all.

3.4.4 MSA Occupational Health & Safety

In this section we include a performance score on the Corporate Sustainability Monitoring with the objective of verifying the company's involvement and management of crisis situations that can have a damaging effect on reputation. The evaluation will be filled in by the responsible analyst of your industry. No additional information is required from your company.

Info Text:
Based on a Media and Stakeholder Analysis (MSA), the consistency of a company's behavior and management of crisis situations is reviewed in line with its stated principles and policies. Results of the MSA range from no impact to high impact - the latter reflecting serious reputational risks with consequences on the company's bottom line (e.g. legal liabilities or high probability of imminent legal liabilities). In addition, the overall quality of the management response to a situation is assessed, evaluating whether a company has transparently and proactively managed the issue.

3.5 Financial Inclusion

Many people still lack access to basic financial services such as insurance or banking. Through services such as microinsurance or microfinance, financial companies can extend their offerings to reach less advantaged customers. Not only do such services address a growing social need in many countries, but they facilitate sustainable local development, increase companies' potential customer base, and respond to the growing number of investors looking for a triple bottom-line return.

3.5.1 Financial Inclusion Commitment

This question requires publicly available information.

Does your company have a public policy or commitment on financial inclusion? Please indicate where this information is available in your public reporting or corporate website.

- Yes, we have a public policy or commitment on financial inclusion in place. The policy covers/contains a statement of commitment to:
  - Innovate and expand the range of financial services available to underserved groups, based on market research and feedback from clients
  - Tailor delivery methods to the targeted group's needs and preferences
  - Offer non-financial support and promote the financial well-being of underserved groups
Establish procedures to prevent over indebtedness of targeted groups

Implement complaint mechanisms easily accessible to financial inclusion clients

Training staff to prevent aggressive sales techniques and disrespectful treatment of targeted groups

Engage with external parties to expand the reach or develop the inclusive finance market

Establish a dedicated role or committee at board/executive or operational level which oversees financial inclusion

- Board of directors
- Executive management

No, we do not have a policy or commitment on financial inclusion.

Not applicable. Please provide explanations in the comment box below.

Info Text:

Question Rationale
This question asks about the policies and commitments companies have in place to offer financial inclusion products and services, as well as practices and procedures to ensure alignment of these with best practices in the field. Key Definitions Financial Inclusion: According to the World Bank, financial inclusion means that individuals and businesses have access to useful and affordable financial products and services that meet their needs. Those products and services include transactions, payments, savings, credit, and insurance, which are designed based on underserved clients' needs and delivery in a responsible and sustainable way. Underserved groups: Unbanked (i.e., those with no access to financial services) or underbanked (i.e., those who do not use financial services, despite having access). Underserved groups are more commonly: - Microbusinesses: Often perceived as too risky or too small for mainstream banking institutions, the International Finance Corporation (IFC) defines microbusinesses as businesses with up to 10 employees, or less than USD 100,000 in assets, or a maximum of USD 100,000 in annual sales. Please note that initiatives or products/services targeted to Small & Medium Enterprises (SMEs) are not acceptable in the financial inclusion questions. - Poor and/or low-income individuals: Those with limited income often have no collateral they can post to obtain loans and often cannot deposit large sums of money to make deposit accounts attractive to banks. Some lack credit history or documentation and have low or no financial literacy. - Individuals in rural or hard-to-reach areas: Individuals in areas with low population density or urban informal settlements that typically lack infrastructure, including financial services. - Women: According to IRIS+, both women individually and women-owned enterprises benefit from strategies that aim to increase women's financial inclusion. In particular, these strategies will focus on underserved women or women-owned enterprises, or those with none or limited access to financial products or services due to socioeconomic or demographic characteristics (e.g., minority group, poor or low income, emerging markets). - Other underserved groups: These may include elderly people, individuals with health conditions or impairments, young people, indigenous groups, migrant or informal workers, unschooled and/or forcibly displaced populations. Please note, to be considered as financial inclusion clients, CSA expects evidence that the groups listed above are indeed vulnerable or underserved: this is usually demonstrated through sociodemographic aspects such as income (e.g., low wage, unemployment), location (e.g., living in remote or marginalized areas), background (e.g., ethnicity, educational level). Hence, please note that: - Products or initiatives targeted to start-ups, women, the elderly or young people, in general, which are not clearly characterized as vulnerable individuals, are not acceptable in financial inclusion questions. - An exception applies to groups which can be considered as inherently vulnerable and underserved by the financial system, such as individuals with health condition or impairments, and forcibly displaced populations. This exception also applies to insurance products which are designed specifically to meet the needs of groups that traditionally have limited access to insurance products (e.g., the elderly in certain situations, individuals with previously existing conditions) A policy or commitment to financial inclusion should state the rules or standards the company applies to provide access to useful and affordable financial products and services to underserved groups. According to standard setters, such as GRI, UNEP, and PRI, this can include: - Client-centered products & services: The financial service provider collects and analyses data to understand underserved clients' needs and preferences. Financial services products, services, and delivery channels are designed based on underserved clients' feedback and insights. - Non-financial support: Comprehensive support services, beyond financial products or services to underserved clients. Such services can help improve client well-being and inform their decision-making about the use of financial products and services. - Client protection: Consideration of underserved clients' financial well-being, and enforcement of fair and respectful treatment of clients. It includes but is not limited to giving clients clear and timely information to support their decision-making, securing client data and informing clients about their data rights, offering complaint mechanisms tailored to underserved clients and resolving complaints.
timely, providing loans based on client’s repayment capacity, charging fair prices and reasonable fees, or avoiding aggressive sales techniques. - Engagement with/of key stakeholders: Engagement with external parties, including regulators and standard setters, to proactively advocate for the development of the financial inclusion market and the harmonization of sector standards. - Governance Oversight: Ensure that the board of directors or executive managers are committed to financial inclusion and oversee policies and procedures. Data Requirements This question is “Not applicable” to real estate investment trusts and investment holding companies. This is a policy question, and we expect information on the long-term, continuous commitment of the company with the elements listed. Information on products and services offered in the most recent financial year is not acceptable in this question and should be captured in questions ‘Products & Services’ and ‘Non-financial support’ instead. Please note that evidence must be available in the public domain. The information provided must be in a dedicated, stand-alone policy or commitment regarding financial inclusion, in your public reporting (e.g., strategy section of an annual report, sustainability report, integrated report, company publications), or in a dedicated section of your corporate website. References World Bank – Financial inclusion is a key enabler to reducing poverty and boosting prosperity. International Finance Corporation (IFC) - IFC’s Definitions of Targeted Sectors IRIS+ - Improving Access to and Use of Responsible Financial Services for Historically Underserved Populations CERISE+SPTF - The Client Protection Assessment Tool and Standards UNPRI: Principles for investors in inclusive finance (PIIF) GRI/UNEP: Sustainability Reporting Guidelines & Financial Services Sector Supplement

3.5.2 Financial Inclusion Products & Services

This question requires publicly available information.

Does your company offer tailored products or services aimed at the financial inclusion of underserved groups? Please indicate where this information is available in your public reporting or corporate website.

- Yes, we offer products or services aimed at the financial inclusion of underserved groups

<table>
<thead>
<tr>
<th>Products &amp; Services</th>
<th>Targeted clients</th>
<th>Number of clients reached</th>
<th>Number of transactions/ contracts</th>
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<tr>
<td>Select from the dropdown list below</td>
<td>Microbusinesses</td>
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<td>❌ Non-Cost or Low Cost Checking Account</td>
<td>Poor and/or low-income individuals</td>
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<tr>
<td>❌ Savings Accounts</td>
<td>Individuals in rural or hard-to-reach areas</td>
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<tr>
<td>❌ Loans</td>
<td>Women</td>
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<tr>
<td>❌ Microinsurance</td>
<td>Other underserved groups</td>
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<td>❌ Other</td>
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<td>Individuals with health condition or impairments</td>
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<td>Young People</td>
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<td>❑ Individuals in rural or hard-to-reach areas</td>
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<td>❑ Un schooled individuals</td>
<td>❑ Un schooled individuals</td>
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</tbody>
</table>

❑ No, we do not offer products or services aimed at the financial inclusion of underserved groups.
❑ Not applicable. Please provide explanations in the comment box below.

Info Text:
Question Rationale This question regards the range of financial inclusion products and services offered by the company. In particular, these products and services should be designed based on underserved clients’ needs and (re)payment capacity. The question also aims to understand who the main targeted clients of financial inclusion products and services are, as well as the reach and engagement of clients with the products and services offered. Key Definitions Financial inclusion products & services: According to the World Bank, financial inclusion means that individuals and businesses have access to useful and affordable financial products and services that meet their needs. Those products and services include transactions, payments, savings, credit, and insurance, which are designed based on underserved client’s needs and payment capacity, and delivered in a responsible and sustainable way, for instance: - Checking accounts: affordable transaction accounts, that allow deposits and transactions at no or low cost. - Savings accounts: non-cost and safe accounts to save and build assets. Saving accounts may also include saving plans to help underserved groups appropriately increase their savings capacity. - Loans: small or very small sums of money aimed at aiding underserved groups and expected to be paid back with low interest and adapted conditions. In the case of loans for microbusinesses, the International Finance Corporation (IFC) defines a loan size proxy up to a maximum of USD 10,000 (size at origination). - Microinsurance: insurance products can aid underserved groups against specific risks and financial losses, such as accidents, disasters, diseases, and death. These risks can endanger the survival of businesses, affect jobs and trap individuals in the poverty cycle. According to the World Bank, to better serve underserved groups, microinsurance products must: be easy to understand, affordable (i.e., priced according to clients’ payment capacity), and cover their priority needs for risk protection (e.g., property, health, or life insurance). - Other financial inclusion products & services: may include payment transactions, credit cards, and/or mortgages targeted at underserved groups. Underserved groups: Unbanked (i.e., those with no access to financial services) or underbanked (i.e., those who do not use financial services, despite having access). Underserved groups are more commonly: - Microbusinesses: Often perceived as too risky or too small for mainstream banking institutions, the International Finance Corporation (IFC) defines microbusinesses as businesses with up to 10 employees, or less than USD 100,000 in assets, or a maximum of USD 100,000 in annual sales. - Poor and/or low-income individuals: Those with limited income often have no collateral they can post to obtain loans and often cannot deposit large sums of money to make deposit accounts attractive to banks. Some lack credit history or documentation and have low or no financial literacy. - Individuals in rural or hard-to-reach areas: individuals in areas with low population density or urban informal settlements that typically lack infrastructure, including financial services. - Women: According to IRIS+, both women individually and women-owned enterprises benefit from strategies that aim to increase women’s financial inclusion. In particular, these strategies will focus on underserved women or those with none or limited access to financial products or services due to socioeconomic or demographic characteristics (e.g., minority group, poor or low income, emerging markets). - Other underserved groups: may include elderly people or young people under certain situations, individuals with health conditions or impairments, ethnic minorities, migrant or informal workers, unschooled and/or forcibly displaced populations. Please note, to be considered as financial inclusion clients, CSA expects evidence that the groups listed above are indeed vulnerable or underserved: this is usually demonstrated through sociodemographic aspects such as income (e.g., low wage, unemployed), location (e.g., living in remote or marginalized areas), background (e.g., ethnicity, educational level). Hence: - Products or initiatives targeted to start-ups, women, elderly or young people, in general, which are not clearly characterized as vulnerable individuals, are not acceptable in financial inclusion questions. - An exception applies to groups which can be considered as inherently vulnerable and underserved by the financial system, such as individuals with health conditions or impairments, and forcibly displaced populations. This exception also applies to insurance products which are designed specifically to meet the needs of groups that traditionally have limited access to insurance products (e.g., the elderly under certain situations, individuals with previously existing conditions). Data Requirements This question is “Not applicable" to real estate investment trusts, investment holdings, stock exchanges, and data providers. Please note that evidence must be available in the public domain. The information provided must be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications) or in a dedicated section of your corporate website. - Products & Services: Please disclose up to 3 products and/or services (one per row), and use description text space as needed. Acceptable financial inclusion products are those developed specifically for underserved groups (see Key definitions). Regular products or those not developed in the context of financial inclusion are not acceptable. Options from the dropdown menu can be marked more than once; however, CSA expects the products within each option to be different. A product may be available in different geographies or to different target groups, but this does not mean it counts as a different product and as such should not be used twice. In case the company marks the same option more than once, CSA expects clear evidence of the differences between these products, for instance: different loan products should have different purposes, offer different payment conditions, require different forms of collateral, or use different delivery methods. - Targeted clients: Please select the option that characterizes the targeted audience for each product/service. See Key definitions for acceptable groups. - Number of clients: this metric seeks to capture information on the reach
of the products and/or services offered. Please add the number of clients reached by the selected product and/or service in the last financial year. As defined by IRIS+, clients are those who were active users of the organization’s products and services at the end of the reporting period. - Number of transactions/contracts: this metric is intended to capture information on the engagement of clients with the products and/or services offered. Please add the number of transactions or active contracts per selected product/service, in the last financial year. As defined by IRIS+, a transaction is considered as an exchange between the client and the organization that results in the purchase or acquisition of the organization’s product/s or service/s, and can include repeated sales per unique client. References World Bank: Microinsurance: a risk management strategy

3.5.3 Financial Inclusion - Non-Financial Support

This question requires publicly available information.

Does your company offer non-financial support (beyond financial products or services) to underserved groups? Please indicate where this information is available in your public reporting or corporate website.

- Yes, we offer non-financial support to underserved groups

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<thead>
<tr>
<th>Non-financial support</th>
<th>Targeted clients</th>
<th>Quantitative social impact KPI</th>
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<td>Select from the dropdown list below</td>
<td>Microbusinesses</td>
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<tr>
<td>Financial or Digital literacy training</td>
<td>Poor and/or low income individuals</td>
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<tr>
<td>Incentives to establish saving accounts</td>
<td>Individuals in rural or hard-to-reach areas</td>
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<td>Technical Assistance</td>
<td>Women</td>
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<td>Business Management Tools or Trainings</td>
<td>Other underserved groups</td>
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<td>Elderly People</td>
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<td>Individuals with health condition or impairments</td>
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<td>Non-financial support</td>
<td>Targeted clients</td>
<td>Quantitative social impact KPI</td>
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<td>Select from the dropdown list below</td>
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<td>❍ Financial or Digital literacy training</td>
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<td>❍ Incentives to establish saving accounts</td>
<td>❍ Individuals in rural or hard-to-reach areas</td>
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<td>❍ Technical Assistance</td>
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<td>❍ Business Management Tools or Trainings</td>
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<td></td>
<td>❍ Unschooled individuals</td>
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</tbody>
</table>

- ❍ No, we do not offer non-financial support to underserved groups.
- ❍ Not applicable. Please provide explanations in the comment box below.

**Info Text:**

**Question Rationale** This question asks about the offer of non-financial support to underserved groups. These supporting services can help improve client well-being and inform their decision-making about the use of financial products and services. The question also asks about the targeted clients, as well as the social impact KPIs / quantifiable metrics for the non-financial products/services. **Key Definitions** Non-financial support: Comprehensive support services, beyond financial products or services, offered to underserved groups. Such services can help improve client well-being and inform their decision-making about the use of financial products and services. These services should be separate from the offer of the company's financial.
inclusion products and services, and not be conditional to the use of the company’s financial products. Those supporting services include: - Financial or digital literacy training: offer of educational support to increase underserved groups’ financial and digital skills. This support can positively impact the use of financial services, and especially the use of financial technologies such as e-banking and e-payments, by underserved groups. - Incentives to establish savings accounts: mechanisms to encourage underserved groups to save money. According to IRIS+, examples of savings account incentives may include monetary one-time bonuses for clients opening a savings account and/or maintaining a certain balance, electronic resources and tools to support ongoing saving efforts, increased interest rates earned on savings, and other methods. - Technical assistance: offer of technical support, usually targeted at microentrepreneurs or small farmers. Tailored advice and guidance aimed at helping underserved groups to better develop their businesses. According to IRIS+, examples of technical assistance could include specific skills training, and consulting services such as process implementation, staffing, etc. Technical assistance may be fee-based or provided for free. - Business management tools or trainings: microenterprise-related learning instruments focused on the development of business management capacity. Content may include general business skills, promotional strategies, financial and commercial planning, among others. Underserved groups: Unbanked (i.e., those with no access to financial services) or underbanked (i.e., those who do not use financial services, despite having access). Underserved groups are more commonly: - Microbusinesses: Often perceived as too risky or too small for mainstream banking institutions, the International Finance Corporation (IFC) defines microbusinesses as businesses with up to 10 employees, or less than USD 100,000 in assets, or a maximum of USD 100,000 in annual sales. Please note that initiatives or products/services targeted to Small & Medium Enterprises (SMEs) are not acceptable in the financial inclusion questions. - Poor and/or low-income individuals: Those with limited income often have no collateral they can use to obtain loans and often cannot deposit large sums of money to make deposit accounts attractive to banks. Some lack credit history or documentation and have low or no financial literacy. - Individuals in rural or hard-to-reach areas: individuals in areas with low population density or urban informal settlements that typically lack infrastructure, including financial services. - Women: According to IRIS+, both women individually and women-owned enterprises benefit from strategies that aim to increase women's financial inclusion. In particular, these strategies will focus on underserved women or those with none or limited access to financial products or services due to socioeconomic or demographic characteristics (e.g., minority group, poor or low income, emerging markets). - Other underserved groups: may include elderly people or young people with certain situations, individuals with health conditions or impairments, ethnic minorities, migrant or informal workers, unschooled and/or forcibly displaced populations. Please note, to be considered as financial inclusion clients, CSA expects evidence that the groups listed above are indeed vulnerable or underserved: this is usually demonstrated through sociodemographic aspects such as income (e.g., low wage, unemployed), location (e.g., living in remote or marginalized areas), background (e.g., ethnicity, educational level). Hence: - Initiatives targeted to start-ups, women, elderly or young people, in general, which are not clearly characterized as vulnerable individuals, are not acceptable in financial inclusion questions. - An exception applies to groups which can be considered as inherently vulnerable and underserved by the financial system, such as individuals with health condition or impairments, and forcibly displaced populations. Data Requirements This question is “Not applicable” to real estate investment trusts, and investment holding companies. Please note that evidence must be available in the public domain. The information provided must be included in a stand-alone policy or commitment regarding financial inclusion, in your public reporting (e.g., annual report, sustainability report, integrated report, company publications) or in a dedicated section of your corporate website. - Non-financial support: Please disclose up to 3 non-financial services/offers (one per row), and use the description text space as needed. Each non-financial service/offer from the dropdown menu can be used only once. Acceptable financial inclusion offers are those developed specifically for underserved groups (see Key definitions). Regular offers or those not developed in the context of financial inclusion are not acceptable. Options from the dropdown menu can be marked more than once; however, CSA expects the services/offers within each option to be different. - A service/offer may be available in different geographies or to different target groups, but this does not mean it counts as a different offer and as such should not be used twice. - In case the company marks the same option more than once, CSA expects clear evidence of the differences between these offers, for instance: different financial literacy trainings should have different purposes, cover different themes, or use different delivery methods. - Non-financial support provided by partner organizations is acceptable, as long as the company is the initiator and main founder of the initiative. - Products & services which embed non-financial support: if non-financial support is conditional to the use of the products and services, then the information should be added to the question Financial inclusion – Products & Services. Non-financial support should be separate from and not conditional to the use of the company’s financial products. - Targeted clients: Please select the option that best characterizes the targeted audience for each non-financial service/offer. See Key definitions for acceptable groups. - Quantitative social impact KPI: The company should indicate the KPIs used to measure the positive social impact of the non-financial services offered (e.g., improved financial skills, increased business resilience, number of participants to
training). The answer should be a quantitative metric. References World Bank – Financial inclusion is a key enabler to reducing poverty and boosting prosperity.

3.5.4 MSA Financial Inclusion

In this section we include a performance score on the Corporate Sustainability Monitoring with the objective of verifying the company's involvement and management of crisis situations that can have a damaging effect on reputation. The evaluation will be filled in by the responsible analyst of your industry. No additional information is required from your company.

Info Text:
Based on a Media and Stakeholder Analysis (MSA), the consistency of a company's behavior and management of crisis situations is reviewed in line with its stated principles and policies. Results of the MSA range from no impact to high impact - the latter reflecting serious reputational risks with consequences on the company's bottom line (e.g. legal liabilities or high probability of imminent legal liabilities). In addition, the overall quality of the management response to a situation is assessed, evaluating whether a company has transparently and proactively managed the issue.

3.6 Customer Relations

Strong relationships with customers lead to increased customer loyalty. Harvard Business School research revealed that a 5% increase in retention can result in a profit increase of up to 75%, depending on the industry. The value of retaining customers makes perfect business sense when one considers that a consumer retained for life is more cost effective, requires less service, provides more business and contributes to new customer acquisition by offering positive referrals. Additionally, customer relationship management tools provide important data which allows the company to target relevant customer groups, develop specific products, and ensure that it has all relevant information to strengthen customer relationships. Online presence and channels have reshaped customer relationships: companies need to be present on several platforms to reach out to customers, and for some sectors today it is strategic development to develop strong online capabilities. In some industries, customer data privacy and safety risks have emerged and companies need to ensure strong policies to avoid increasing costs of breaches and negative reputational impact.

The key focus of the criterion is on the tools a company has implemented or is using to manage customers, online strategy, sales and distribution channels, customer satisfaction and customer protection.

3.6.1 Customer Satisfaction Measurement

Additional credit may be granted for publicly available evidence.

Does your company monitor and set quantitative targets to improve satisfaction and are targets and results communicated externally? Please attach documents and indicate the coverage for the data provided. Please refer to the information button for additional clarifications. For each row in the table, it is mandatory that the values provided are in the same unit.

- Yes, we measure customer satisfaction using relevant unit of measurement. Please attach supporting evidence.
- Document Satisfactory: 
<table>
<thead>
<tr>
<th>Satisfaction Measurement</th>
<th>Unit (Please select the unit of measurement)</th>
<th>FY 2020</th>
<th>FY 2021</th>
<th>FY 2022</th>
<th>FY 2023</th>
<th>What was your target for FY 2023?</th>
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<tbody>
<tr>
<td>Satisfaction Measurement</td>
<td>Satisfaction measurement methodology:</td>
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<td>❍ Percentage of satisfied customers/tenants</td>
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<td>❍ Net promoter score or similar</td>
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<td>Data coverage:</td>
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<td>❍ Customers</td>
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<td>❍ Operations</td>
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<td>❍ Revenues</td>
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<td>❍ Tenants</td>
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</table>

- Information is available in the public domain

- Satisfaction is not monitored.

- Not applicable. Please provide explanations in the comment box below.

- Not known

**Info Text:**
Research from Harvard Business School has shown that a 5% increase in retention can result in a bottom-line profit increase of up to 75%, depending on the industry. The dramatic economic power of customer retention is revealed when viewing customers in terms of lifetime value (LTV). The value of retaining customers makes perfect business sense when one considers that a consumer retained for life is more cost-effective, requires less service, provides more business, and contributes to new customer acquisition by offering positive referrals. Companies in consumer-facing industries (B2C) should therefore monitor customer satisfaction and report the results of satisfaction surveys targeting consumers (i.e., end users) of their products/services. Key Definitions

- **Customer or client:** Buyer of services or goods from someone else. In the context of this questionnaire, we focus on customers/clients for B2B companies.
- **Consumer:** User of a certain product or commodity. In the field of economics, a consumer can either be a single person or an entire organization using a certain type of service. In the context of this questionnaire, we focus on consumers for B2C companies.

**Data Requirements**
- B2C companies should report the results of satisfaction surveys targeting consumers of their products/services (i.e., end users of the products/services instead of the distributor/retailers they sell their products through).
- B2B companies should report the results of satisfaction surveys for their customers or clients (direct buyers of their products or services). In case your company is active in different businesses involving B2C activities (consumers) and B2B (customers), please report the information corresponding to the business that represents the highest share of your total revenue.

**Unit:** % of satisfied customers out of the total number of customers responding to the survey. The percentage should be calculated as follows: Number of satisfied customers / Total number of customers responding to the survey.

**Data Coverage:** % of customers surveyed (both respondents and non-respondents) out of total customers. The data coverage should be calculated as follows: Number of customers surveyed (both respondents and non-respondents) / Total number of customers. Companies may report full coverage if a statistically significant, representative sample of its customer base has been surveyed.

**Target:** We require the absolute target for the most recent reporting year. If your company has a multiple-year and/or relative target, please extrapolate what the target value would have to be for the last financial year to make sure you are progressing well towards...
achieving the target by the end of the target period. Bi-annual satisfaction surveys: if your company only conducts a customer satisfaction survey every two years, then please copy the results from the previous year (when you did conduct a survey) into the box for the following year (when you did not conduct one). For example, if you conducted a survey in 2015 but not in 2016, copy the results from the 2015 survey in the 2016 box, to fill the entire table and make it possible to calculate a trend (FY-2 – FY0). Disclosure requirements for partially public question. Additional credit will be granted for relevant publicly available evidence covering the following aspect of this question: - Percentage of satisfied clients in the last reported year (measured through a satisfaction survey or through an alternative approach) Guidance for utilities (ELC, MUW, GAS) In the case of a company that has only exposure to electricity transmission and/or distribution, we expect to use this question to gather information about the satisfaction of the clients using the services provided by the company regardless of the income model. For instance, we intend to capture information about the satisfaction of generators and/or consumers and/or distributors requesting connection access to the infrastructure, generators, and consumers participating in markets operated by the company, participants in the network planning process if it is coordinated by the infrastructure operator, etc. Guidance for Real Estate Management & Development and Equity REIT If in the 'Denominator – Area' question, business activity “Management of Standing Investments” is chosen, we expect companies to choose “tenants” in the dropdown list for data coverage. If this activity is not chosen, i.e., only the activities “Development of new construction and/or major renovation projects” and/or “Services” are selected, we expect companies to report on “customers”.

3.6.2 MSA Customer Relations

In this section, we include a performance score on the Corporate Sustainability Monitoring with the objective of verifying the company's involvement and management of crisis situations that can have a damaging effect on reputation. The evaluation will be filled in by the responsible analyst of your industry. No additional information is required from your company.

Info Text:
Based on a Media and Stakeholder Analysis (MSA), the consistency of a company’s behavior and management of crisis situations is reviewed in line with its stated principles and policies. Results of the MSA range from no impact to high impact - the latter reflecting serious reputational risks with consequences on the company's bottom line (e.g. legal liabilities or high probability of imminent legal liabilities). In addition, the overall quality of the management response to a situation is assessed, evaluating whether a company has transparently and proactively managed the issue.

3.7 Privacy Protection

Networked data and globalised corporate activities require careful handling. Insufficient database and network protection, unclear management of personal information and vague database access rules could expose companies to large risks in case of personal data leakage and misuse, or unauthorized access. For companies to avoid legal costs, reputational risk, and exclusion from certain activities, a company-wide privacy policy is paramount. Our questions focus on the coverage of the company's privacy policy and the mechanism in place to ensure the policy's effective implementation.

3.7.1 Privacy Policy: Systems/ Procedures

This question requires publicly available information.

Does the company have measures in place to ensure effective implementation of its privacy policy and is it available publicly?
Yes, the company has measures in place to ensure effective implementation of its privacy policy. Please indicate where this information is available in public reporting or corporate website.

<table>
<thead>
<tr>
<th>Aspect:</th>
<th>Please provide supporting evidence for the aspect and indicate page numbers:</th>
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<tbody>
<tr>
<td>☐ Privacy policy applies to the entire operations, including suppliers</td>
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<tr>
<td>☐ Designated person or department responsible for privacy issues</td>
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<td>☐ Privacy policy system embedded in group-wide risk/compliance management</td>
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<tr>
<td>☐ Disciplinary actions in case of breach (i.e. zero tolerance policy)</td>
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<tr>
<td>☐ We conduct third-party audits of the privacy policy compliance.</td>
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<tr>
<td>☐ We conduct internal audits of the privacy policy compliance.</td>
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No, the company does not publicly report on measures to ensure that its privacy policy is implemented effectively.

Not applicable. Please provide explanations in the comment box below.

Info Text:
Question Rationale Networked data and globalized corporate activities require diligent information handling. In order to avoid the risks associated with these developments – such as legal costs, reputational damage, and the exclusion from certain activities – companies must endeavor to implement a comprehensive privacy policy spanning across their businesses, along with a sound implementation framework. This question assesses whether the company has the requisite mechanisms in place to ensure that its privacy policy is effectively implemented. Key Definitions Privacy Policy: An internal statement that governs an organization or entity's handling of personal information. It is directed at those members of the organization who might handle or make decisions regarding personal information, instructing them on the collection, use, storage, and destruction of the data, as well as any specific rights the data subjects may have. It may also be referred to as a data protection policy. This policy is different from the privacy notice, which refers to an external statement to consumers/customers to describe how the company collects, uses, retains, and discloses personal information. This question specifically focuses on the internal statement directed at the members of the company handling private information. Data protection is about protecting any information relating to an identified or identifiable natural (living) person, including names, dates of birth, photographs, video footage, email addresses, and telephone numbers. Other information such as IP addresses and communications content - related to or provided by end-users of communications services - are also considered personal data. (Source: European Data Protection Supervisor) Personal data is any information that relates to an identified or identifiable living individual. Different pieces of information, which are collected together can lead to the identification of a particular person, and also constitute personal data: (Source: European Data Protection Supervisor) Examples of personal data include - a name and surname; - a home address; - an email address such as name.surname@company.com; - an identification card number; - location data (for example the location data function on a mobile phone)*; - an Internet Protocol (IP) address; - the advertising identifier of your phone; - data held by a hospital or doctor, which could be a symbol that uniquely identifies a person Personally identifiable information (PII) is any information that relates to an identified or identifiable living individual. It is another term for Personal data. (Source: NIST Computer Security Resource Center) Suppliers (or service providers) are understood as any third party that provides goods or services to the company (such as a consultant, contractor, advisor, or vendor). Data Requirements Disclosure requirements for public question: This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications, separate fuel efficiency strategy document) or corporate website. Any response that cannot be verified in the attached public document(s) will not be accepted. Privacy policy applies to the entire operations, including suppliers: We expect the company's privacy policy to apply to all operations. The same policy/
standards should be applicable to suppliers. A mention of privacy protection or confidentiality of information in the Codes of Conduct is not sufficient, we expect a separate privacy policy or section on privacy protection. Defined point of contact in place for escalation of privacy issues: We expect companies to have a designated person or department that employees can reach out to in case of any privacy issues or concerns. If this person/department is not dedicated to privacy policy issues but to a general escalation of concerns, there should be clear evidence that privacy policy issues should be conducted through this channel as well. Privacy policy system embedded in group-wide risk/compliance management: Privacy policy systems and procedures should be embedded in group-wide risk/compliance management. Privacy protection should be included in the overall operational risk/compliance management structures of the company. Disciplinary actions in case of breach: We expect the policy to cover the corrective and disciplinary actions taken in case of a breach of the policy. A general mention of disciplinary actions in the Codes of Conduct is not sufficient, we expect the statement to be specific to data privacy. Audit of privacy policy compliance: Please specify whether you conduct internal and/or external audits of your privacy policy compliance. If your company conducts both, please tick both options. Supporting evidence: - This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications, separate fuel efficiency strategy document) or corporate website. - Any response that cannot be verified in the attached public document(s) will not be accepted.

3.7.2 Customer Privacy Information

This question requires publicly available information.

Does the company inform customers regarding privacy protection issues and is this information available publicly?

- Yes, the company informs its customers regarding privacy protection issues. Please indicate where this information is available in public reporting or corporate website.
  - Nature of information captured
  - Use of the collected information
  - Possibility for customers to decide how private data is collected, used, retained and processed
    - Opt-out option is available
    - Opt-in consent is required
    - Request access to data held by the company
    - Request their data to be transferred to other service providers
    - Request their data to be corrected
    - Request their data to be deleted
  - How long the information is kept on corporate files
  - How the information is protected
  - Third-party disclosure policy (private and public entities)
    - We monitor the percentage of users whose customer data is used for secondary purposes. Please indicate the percentage of customers whose data is used for secondary purposes and provide publicly available evidence.

- No, the company does not publicly report on customer privacy information.

- Not applicable. Please provide explanations in the comment box below.

Info Text:
Question Rationale: Networked data and globalized corporate activities require diligent information handling. In order to avoid the risks associated with these developments – such as legal costs, reputational damage, and exclusion from certain activities – companies must then endeavor to implement a comprehensive privacy policy spanning across their businesses, along with a sound implementation framework. For this question,
we assess companies' transparency with customers on privacy protection issues. Key Definitions Customer: Someone who buys services or goods from someone else. In the context of this questionnaire, we focus on customers for B2B companies. Consumer: Someone that consumes a certain product or commodity. In the field of economics, a consumer can either be a single person or an entire organization using a certain type of service. In the context of this questionnaire, we focus on consumers for B2C companies. Secondary purpose: Data collection for a secondary purpose is defined as the intentional use of data by a company that is outside the primary purpose for which the data was collected. Examples of secondary purposes include, but are not limited to, selling targeted ads, improving the entity's products or service offerings, and transferring data or information to a third party through sale, rental, or sharing. Data Requirements Supporting evidence: This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications, separate fuel efficiency strategy document) or corporate website. Any response that cannot be verified in the attached public document(s) will not be accepted.

3.7.3 MSA Privacy Protection

In this section, we include a performance score on the Corporate Sustainability Monitoring with the objective of verifying the company's involvement and management of crisis situations that can have a damaging effect on reputation. The evaluation will be filled in by the analyst responsible for your industry. No additional information is required from your company.

Info Text:
Based on a Media and Stakeholder Analysis (MSA), the consistency of a company's behavior and management of crisis situations is reviewed in line with its stated principles and policies. Results of the MSA range from no impact to high impact - the latter reflecting serious reputational risks with consequences on the company's bottom line (e.g. legal liabilities or high probability of imminent legal liabilities). In addition, the overall quality of the management response to a situation is assessed, evaluating whether a company has transparently and proactively managed the issue.

4 Future Questions (Optional)

In this section, questions on new, developing sustainability topics are asked with the intention of adding them to future revisions of the Corporate Sustainability Assessment. Questions asked in this section will not contribute to the Total Sustainability Score in the specific year they are asked. We may choose to ask these questions in the same or modified format in future years, and add them to the standard part of the questionnaire, in which case they will contribute to the Total Sustainability Score in that year. We encourage companies to complete the questions in this section in order to allow us to perform data analysis on the results to inform future revisions of the questions and scoring schemes, as well as to provide companies the opportunity to engage with us on these topics.

4.1 Sustainable Artificial Intelligence

Despite the enormous potential of Artificial Intelligence systems to enhance productivity and boost the economy, these technologies also have the potential to produce important societal changes and to impact the environment. Given the fast development of AI applications, numerous governments and international bodies have directed their efforts to produce different initiatives that promote their sustainable development and use. These initiatives include market regulations, codes of conduct, risk-based mitigation approaches, regulatory frameworks and the creation of ad-hoc entities with the objective of supervising, testing and maintaining oversight over the topic.
Over the next years, businesses will implement different AI applications both for their own uses and for market purposes. Together with this, the impacts on environment and society will likely increase, suggesting the need to implement solid AI Governance structures to individuate and mitigate the associated risks. Some of the key challenges businesses and authorities will have to deal with include managing data privacy and copyright protection, addressing ethical concerns (bias and discrimination), limiting misuse, and guaranteeing transparency and explainability of complex algorithms. This criterion in the Future Questions section focuses on the ability of companies to recognize these challenges and to start acting by implementing sound governance and by using AI Systems to drive improvements in their sustainability performance.

4.1.1 Artificial Intelligence Policy

Additional credit may be granted for publicly available evidence.

Does the company have a dedicated policy or commitment on Artificial Intelligence (AI) that includes at least one of the following aspects?

♥ Yes, the company has a dedicated policy or commitment on AI and it includes at least one of the following aspects. Please provide supporting evidence:
  
  **Policy or Commitment aspects**
  
  - Ensuring the respect of data privacy in the use and/or development of AI
  - Protecting the cybersecurity of systems in the use and/or development of AI
  - Avoiding potential bias in the use and/or development of AI
  - Allowing users to identify AI-generated content

  **Public Reporting**
  
  - There is a publicly available policy or commitment on AI, and it contains at least one of the above aspects.

  **AI Policy Endorsement**
  
  - Is there a dedicated policy or commitment on AI endorsed by a member of either the Board of Directors, or Executive Management?
    
    - Board of Directors
    - Executive Management (Chief AI Officer or similar)

♥ No, the company does not have a dedicated policy or commitment on AI that includes at least one of the above aspects, however, the topic is specifically included in the following group policies. Please provide supporting evidence:

  - Privacy policy
  - Cybersecurity policy
  - Human Rights Policy
  - Other:

♥ No, the company does not have a dedicated policy or commitment on AI that includes at least one of the above aspects, nor is the topic included in other group policies, but the company is planning to develop a dedicated policy or commitment on AI or include the topic in other group policies in the next two years. Please provide supporting evidence.

♥ No, the company does not have a dedicated policy or commitment on AI that includes at least one of the above aspects, nor does it include the topic in any of the group policies, nor does it plan to develop a policy on AI or include the topic in other group policies in the next two years.

♥ Not applicable. Please provide an explanation in the comment box below.
Question Rationale: The purpose of this question is to ascertain the degree to which businesses are assessing the risks associated with the development and/or use of artificial intelligence systems. Businesses are progressively increasing their development and use of artificial intelligence systems for different applications, from supply chain optimization to process enhancement and customer experience. The risks (and opportunities) arising from artificial intelligence require a new robust set of governance systems to carefully manage its implementation, use, and potential externalities. This question focuses on the policies that companies have in place to manage these risks and opportunities and on the governance systems implemented. This includes evaluating if the company has a dedicated and publicly available policy or commitment on artificial intelligence that includes certain aspects, and if there is a dedicated role or committee at board/executive level which endorsed it. In the scenario of a company that does not have a dedicated policy or commitment on artificial intelligence that includes at least one of the aspects listed, nor the topic is included in other group policies, the question evaluates if the company is planning to develop a dedicated policy or commitment on artificial intelligence that include at least one of the listed aspects or to include the topic in other group policies in the next two years. Key Definitions: Ensuring the respect of data privacy: Companies developing and/or using AI Systems need to implement specific risk-based approaches to guarantee the privacy of users. This may also involve the creation and use of innovative privacy-preserving techniques, as well as complying with national and international privacy regulations. Protecting the cybersecurity of systems: AI Systems can be the target of complex cyberattacks which can compromise inputs, outputs and the overall stability of these systems. It is the responsibility of companies to identify and mitigate vulnerabilities to guarantee systems’ integrity across the AI lifecycle. Avoiding potential bias: AI Systems need to be trained to prevent potential bias in outputs, which could lead to unfair discrimination. Companies need to identify and remove this risk through research and testing of reliable systems to mitigate it, as well as investing in effective mitigation measures. Allowing users to identify AI-generated content: As these systems continue to advance, it is becoming progressively more difficult to individuate which content is AI-generated and which not. National and international regulative bodies are expecting companies to develop and implement trustworthy methods for content provenance and authentication, such as watermarking or other methods that allow the users to recognize content created by artificial intelligence. Data Requirements: Not Applicable for the question: - This question may be marked “Not applicable” for companies that can credibly demonstrate in a comprehensive comment that their company does not develop and/or use AI Systems. Disclosure Requirements: Disclosure requirements for partially public question: qualitative information is verified against attached document(s) or comprehensive company comments. Options that cannot be verified will be unticked. Additional credit will be granted for relevant publicly available evidence covering a dedicated policy or commitment on AI which includes at least one of the four following aspects: - Ensuring the respect of data privacy in the use and/or development of AI - Protecting the cybersecurity of systems in the use and/or development of AI - Avoiding potential bias in the use and/or development of AI - Allowing users to identify AI-generated content

4.1.2 Artificial Intelligence and ESG Performance

Does the company use Artificial Intelligence (AI) to improve performance across different ESG dimensions?

- Yes, the company uses AI to improve performance across ESG dimensions. Please provide a description of initiatives that leverage AI.
**Aspects covered**

<table>
<thead>
<tr>
<th>Environmental</th>
<th>Social</th>
<th>Governance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Biodiversity</td>
<td>Human Rights</td>
<td>Reporting &amp; Transparency</td>
</tr>
<tr>
<td>Climate</td>
<td>Occupational Health &amp; Safety</td>
<td>Information Security</td>
</tr>
<tr>
<td>Energy Consumption</td>
<td>Privacy Protection</td>
<td>Supply Chain</td>
</tr>
<tr>
<td>Water Management</td>
<td>Human Capital Development</td>
<td>Risk Management</td>
</tr>
<tr>
<td>Waste Management</td>
<td>Customer Relations</td>
<td>Product Quality &amp; Safety</td>
</tr>
<tr>
<td>Sustainable Products and Services</td>
<td>Community Relations</td>
<td></td>
</tr>
</tbody>
</table>

**Metrics to measure performance**

<table>
<thead>
<tr>
<th>Environmental</th>
<th>Social</th>
<th>Governance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Quantification of impacts</td>
<td>Quantification of impacts</td>
<td>Quantification of impacts</td>
</tr>
</tbody>
</table>

**Supporting evidence**

- No, the company does not use AI to improve performance across ESG dimensions.
- Not applicable. Please provide an explanation in the comment box below.
- Not known

**Info Text:**

Question Rationale The purpose of this question is to determine if and how companies are leveraging the opportunities associated with the use of artificial intelligence. The emergence of artificial intelligence (AI) has spurred governments, institutions and companies to investigate and set forth guidelines on the use and development of AI technologies to mitigate risks and negative impacts on society and the environment. Further discussions have considered how AI technologies can be applied to strengthen organizational ESG management and manage related risks. Given this, we aim to understand how companies are leveraging AI to improve or achieve ESG performance/objectives by capturing qualitative information on the types of ESG initiatives and the quantification of impacts to measure performance. Key Definitions Description of initiatives: Companies are expected to provide specific examples of initiatives or programs that leverage AI to improve performance across the three ESG dimensions. One such example for addressing the "climate" aspect could be a company using AI to better quantify localized emissions from satellite remote-sensing data. For the aspect “reporting & transparency”, AI can assist in monitoring large amounts of regulatory data to identify potential breaches allowing organizations to take proactive measure. Quantification of impacts: These could refer to monetary or non-monetary metrics that a company uses to track and measure the impacts of its AI initiatives to improve ESG performance. These metrics to measure improvements in ESG performance should be directly linked to the initiatives described and have a measurable outcome or impact. Please note that future expected impacts of the program or initiative can also be included here. Disclosure Requirements Supporting Evidence: - The document(s) you attached will be used to verify your response. - The supporting documents do not need to be available in the public domain. - If a question text field is available, a comprehensive answer in that field can be accepted instead of a supporting document. - Any response that cannot be verified in the attached document(s) or via the information provided in the related question text field (if available) will not be accepted.

**4.2 Talent Planning and Analytics**

**4.2.1 People Analytics**

Does your company use any People Analytics (PA) in any of the following analysis? If yes, please select any practice that apply and provide a supporting evidence indicating the page number where the relevant information can be found and a comment in the reference field with a short description of how People Analytics is applied in your case.

Please note that companies are not expected to make use of PA in all the following analysis. For further clarifications, please consult the information text.
Yes. Please select any relevant analysis that apply:

- Measuring employee performance
- Strategic workforce planning
- Identifying current workforce skills gaps
- Recruiting & hiring (e.g., evaluating recruiting channels, screening of candidates, assessing talent supply/demand)
- Identifying flight risks to improve retention
- Competitive intelligence
- Organizational network analysis

No, our company does not use People Analytics.

Not applicable. Please provide explanations in the comment box below.

Info Text:
Question Rationale People Analytics (also known as HR or Talent analytics) refers to the application of advanced analytics and use of large data sets in human capital management. Using the knowledge gained through analysis of human capital related data can help companies identify current risks and opportunities and make better informed decisions to improve talent management and eventually business performance. The main cases for which companies have started using analytics are employee performance measurement and workforce planning. Companies are also applying data to identify skills gaps, evaluate recruiting channels, screen candidates and assess talent supply and demand etc. Asking about the use of People Analytics, i.e., collection and analysis of HR related data in order to draw insights (e.g., solving existing problems or capitalizing on new opportunities) doesn’t suggest the dehumanization of the employer-employee relationship. On the contrary, it is proven that evaluating data that companies are already collecting might be useful to further improve employee experience, better inform employee training and development efforts, promote fair treatment of employees and eliminate bias. Key Definitions People analytics: it is also known as HR, Talent or workforce analytics. It is the practice of collecting and analyzing Human Resources and organizational data through the application of statistics and other data interpretation techniques. The aim of this method is to transform this data into actionable insights that improve the company’s systems, processes and strategies in order to achieve sustainable business success. Strategic workforce planning: it is the long-term planning aiming at “the strategic alignment of an organization’s human capital with its business direction. It is a methodical process of analyzing the current workforce, determining future workforce needs, identifying the gap between the present and the future, and implementing solutions so the organization can accomplish its mission, goals, and objectives.” (Minnesota Management and Budget cited, HR Society 2013, p.3). Types of Workforce planning: - Strategic planning: long-range planning, usually covering a 3 to 5 year forecast period, aligned to business needs and outcomes. It focuses on identifying the workforce implications, current, transition and future of business strategic objectives and includes scenario planning. - Operational planning: mid-range planning, usually covering the next 12 to 18 months. It should align with the timeframe of the business planning cycle. It is the process and systems applied to gathering, analyzing and reporting on workforce planning strategy. - Tactical or short-range planning: it takes place once a year and is usually part of budgeting Identify current workforce skill gaps: this practice should be considered as a part of the Strategic Workforce Planning (SWP) process. Some companies may identify current workforce skill gaps for operational reasons or for short-term planning, e.g., they may evaluate that they are currently more in need of employees with a specific programming knowledge and decide to open two positions in a specific year, without necessarily taking into consideration the more long-term planning and strategic direction. Recruiting & hiring (e.g., evaluating recruiting channels, screening of candidates, assessing talent supply/demand): examples may include but are not limited to engaging assessments identifying successful candidates, use of external databases to evaluate talent pool, screening of internal databases to identify internal employees with relevant skills etc. Identifying flight risks to improve retention: this refers to the process of identification of disengaged or dissatisfied employees with their current compensation, job or career prospects that may look elsewhere for new opportunities. These employees are deemed as high-risk employees to quit. Competitive intelligence: Competitive Intelligence (CI) is the systematic collection and analysis of information from multiple sources, often used in marketing, product, and sales departments in order to understand a company’s competitive landscape. In the Human Resource field, CI is used in developing human capital strategies, identifying related threats and opportunities and advancing organization’s talent retention and acquisition efforts from industry
information, company research, organizational charts, employee information, labor market information, and overall trends. Organizational network analysis: Also known as Relational Analytics, Organizational Network Analysis (ONA) is a method for studying information flow, interaction and socio-technical networks within an organization. This technique creates statistical and graphical models of people, tasks, groups, knowledge and resources of organizational systems. It is based on social network theory and more specifically, dynamic network analysis. ONA is a growing trend in the field of People Analytics, especially around the concept of understanding diversity and inclusion, innovation, as well as employee performance and motivation. Data Requirements - If you have less than 100 employees or no employees in your organization, then please mark the question as “Not applicable”. - Companies are not expected to make use of PA for all the type of analysis listed in the question. One option is sufficient to achieve maximum score in this question, if the supporting evidence and short description comment meet our requirements. - It is possible that a company uses People Analytics for different cases that correspond to more than one of the options available. Please select all that apply, provide relevant supporting evidence and a short description. - The analysis shared in this question do not need to apply to the whole company, it can also apply to a local/regional/segment/business unit. - In this question, it is not required to share the actual data of your analysis but rather the analytical process that has been followed. The analysis can be qualitative, quantitative, predictive or perspective. For example, this question doesn’t ask whether your company is measuring employee performance but rather whether any software, systems, real-time monitoring or other tools are used to collect and analyze this data in order to better evaluate employee performance. Supporting evidence: - Any type of supporting evidence that can demonstrate the type of analysis conducted is acceptable (e.g., screenshots of online systems, documents of application procedures, documentation of a successful application case, comprehensive comments). Further details on supporting evidence: - The document(s) you attached will be used to verify your response. - The supporting documents do not need to be available in the public domain. - If a question text field is available, a comprehensive answer in that field can be accepted instead of a supporting document. - Any response that cannot be verified in the attached document(s) or via the information provided in the related question text field (if available) will not be accepted. - People Analytics tools can be internally and/or externally developed (e.g., LinkedIn) but they should have an internal focus, i.e., aiming to improve the company’s systems, processes and strategies in order to achieve better talent management. - Companies are not expected to have high-tech systems or platforms in place in order to conduct HR data analysis, use of simple tools (e.g., Excel) is also sufficient if they serve companies’ analytical purposes. - General statements that a company uses People Analytics are not acceptable. - Evidence of the outcome of the analysis is welcome but not necessary. This information is necessary in the Strategic Workforce Planning question. - Simple tracking of HR data and sharing of data sheets is not sufficient. This question doesn’t seek evidence of simple data collection, but it focuses on understanding what type of data analysis has been conducted in order to identify issues or key areas of improvement in talent management. References Global Talent Trends, 2020, LinkedIn Talent Solutions. Minnesota Management and Budget cited, The Complete Guide to Workforce Planning. In HR Society, 2013, p.3 https://en.wikipedia.org/wiki/Organizational_network_analysis People Analytics Grows Up: Healthy New Focus On Productivity”. Josh Bersin.

4.2.2 Strategic Workforce Planning

Does your company currently use People Analytics (PA) for your Strategic Workforce Planning (SWP)? If your company has different processes in place for different business unit, please select one that you perceive as the most strategic and it is more broadly applied within your organization. For further clarifications, please consult the information text.

☑ Yes. Please describe the process in the table below and provide supporting evidence:

Please indicate what is the application coverage of the process described (in percentage of global FTEs):

<table>
<thead>
<tr>
<th>Description</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Opportunity: Why does your company use PA for SWP?</td>
<td></td>
</tr>
</tbody>
</table>

☑ > 75% of all FTEs globally

☑ 50 - 75% of all FTEs globally

☑ 25 - 50% of all FTEs globally

☑ < 25% of all FTEs globally

Created by S&P Global, on 06 May 2024 15:25
No, we do not use People Analytics for our Strategic Workforce Planning

Not applicable. Please provide explanations in the comment box below

Not known

Info Text:
Question Rationale One of the most common areas where companies have started applying People Analytics is in their Strategic Workforce Planning. By applying data analysis, companies try to estimate future company's workforce needs along with studying external landscape. For example, they can estimate how many new and replacement hires will be needed in the months or years ahead, gather data for current turnover and work with business strategists to understand where and how growth will occur. This helps companies to earlier address risks that may occur or capitalize on opportunities by finding solutions to better manage talents. Key Definitions FTEs: Full-Time Equivalents is the number of working hours that represents one full-time employee during a fixed time period, such as one month or one year. The concept is used to convert the hours worked by several part-time employees into the hours worked by full-time employees. Workforce planning: It is the long-term planning aiming at "the strategic alignment of an organization’s human capital with its business direction. It is a methodical process of analyzing the current workforce, determining future workforce needs, identifying the gap between the present and the future, and implementing solutions so the organization can accomplish its mission, goals, and objectives.” (Minnesota Management and Budget cited, HR Society 2013, p.3). Types of Workforce planning - Strategic planning: long-range planning, usually covering a 3 to 5 year forecast period, aligned to business needs and outcomes. It focuses on identifying the workforce implications, current, transition and future of business strategic objects and includes scenario planning. - Operational planning: mid-range planning, usually covering the next 12 to 18 months. It should align with the timeframe of the business planning cycle. It is the process and systems applied to gathering, analyzing and reporting on workforce planning strategy. - Tactical or short-range planning: it takes place once a year and is usually part of budgeting. Data Requirements - If you have less than 100 employees or no employees in your organization, then please mark the question as “Not applicable”. - This question is different from the People Analytics (PA) question. This question requires a more detailed description of the company's Strategic Workforce Planning (SWP). In the People Analytics question, companies are asked if they collect and analyze HR related data through the application of statistics or other data interpretation techniques in different practices (e.g., in order to measure employee performance, in their recruiting & hiring processes, etc.). The Strategic Workforce Planning question focuses only on the application of PA in SWP and requires extensive description of the purpose of the analysis, the method/tool used and the result of the analysis. - Companies that have more than one relevant processes in place should report on the one that they perceive as the most strategic and for which they can provide the best description of the opportunity, the process / tools / techniques / methods / models used and their outcomes. Description: An acceptable description should include the following elements: - Opportunity: Why does the company apply People Analytics in Strategic Workforce Planning? The aim of the activity or the purpose the company is seeking to address with such analysis should be described. For example, a company may be investing in analytics in order to combat high voluntary employee turnover. - Action: How People Analytics have been used? Description of process / tools / techniques / methods / models being used to collect and use the necessary data and the type of data that is used. For example, a company builds and rolls out dashboards of data on headcounts, employee engagement, compensation or a company develops predicting models to analyze the data already collected. - Outcome: What is the business impact/result of the initiative? For example, a company is able to develop models to effectively predict employees with high flight risk, modify its strategy and thereby lower voluntary employee turnover. Supporting evidence: please provide supporting documentation (private or public) that will help better support the description of your PA application in SWP. Any type of supporting evidence that can demonstrate the type of analysis conducted is acceptable (e.g., screenshots of online systems, documents of application procedures, documentation of a successful application case, comprehensive comments). - The document(s) you attached will be used to verify your response. - The supporting documents do not need to be available in the public domain. - If a question text field is available, a comprehensive answer in that field can be accepted instead of a supporting document. - Any response that cannot be verified in the attached document(s) or via the information provided in the related question text field (if available) will not be accepted. Minnesota Management and Budget cited, The Complete Guide to Workforce Planning. In. HR Society, 2013, p.3 Strategic Workforce Planning: Developing
5 Feedback Survey: Your input is welcome

Your feedback is a crucial component for the further development of the Corporate Sustainability Assessment. We very much value your honest and direct feedback and input on CSA improvement ideas. Thank you for taking the time to provide your valuable feedback.

This feedback section is not used in the assessment or scoring of your company, is not mandatory and is strictly confidential.

Please note that this feedback survey section will also appear in the PDF version of the questionnaire.

5.1 Overall Impression

How likely is it that you would recommend the CSA to a peer or colleague?

- 10 - Extremely Likely
- 9
- 8
- 7
- 6
- 5
- 4
- 3
- 2
- 1
- 0 - Not at all

What motivates you/your company to participate in our Corporate Sustainability Assessment? Your answers enable us to do our best for you to get the most value out of your participation. We kindly ask you to rank the following reasons in order of importance to your company (1 = most important motivation, 6 = least important motivation) and to specify why each driver is important to you.
<table>
<thead>
<tr>
<th>Rank of importance (1 = most important, 6 = least important)</th>
<th>Motivation to participate</th>
<th>Please specify why this driver is important to your company:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>❑ Increase visibility with sustainability focused investors</td>
<td></td>
</tr>
<tr>
<td></td>
<td>❑ Enhance reputation with internal and external stakeholders (other than investors)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>❑ Learn from the CSA results and help prioritize sustainability initiatives (e.g. benchmarking, identify gaps and improvements areas)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>❑ Use as internal management tool (e.g. to set KPIs)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>❑ Understand the link between sustainability and business strategy and increase interaction across the company</td>
<td></td>
</tr>
<tr>
<td></td>
<td>❑ Other, please specify</td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td>❑ Increase visibility with sustainability focused investors</td>
<td></td>
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<td></td>
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<tr>
<td></td>
<td>❑ Other, please specify</td>
<td></td>
</tr>
<tr>
<td>Rank of importance (1 = most important, 6 = least important)</td>
<td>Motivation to participate</td>
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<td>--------------------------------------------------------------</td>
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<td>3.</td>
<td>- Increase visibility with sustainability focused investors</td>
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<td>- Other, please specify</td>
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<td>Please specify why this driver is important to your company:</td>
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<tr>
<td>5.</td>
<td>✓ Increase visibility with sustainability focused investors</td>
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<tr>
<td></td>
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<td></td>
</tr>
<tr>
<td></td>
<td>✓ Other, please specify</td>
<td></td>
</tr>
</tbody>
</table>

Do you believe that the current CSA ranking is a fair representation of the Corporate Sustainability Performance in your peer group?

- ✓ 6 = The ranking completely reflects the sustainability performance of the peer group
- ✓ 5
- ✓ 4
- ✓ 3
- ✓ 2
- ✓ 1 = The ranking does not at all reflect the sustainability performance of the peer group
5.2 Methodology Development Input

The ongoing development of our questionnaire benefits a lot from your input. Your answers in this section help us to improve our focus and update the areas that are most important to companies. Which topics within the questionnaire do you think are in most need of improvement? Please choose the three most important topics in the drop down lists below. If you choose 'Other', please specify which topic within the questionnaire you find most material in the text box.

1st priority improvement topic
- Biodiversity
- Business Ethics
- Climate Strategy
- Corporate Governance
- Customer Relations
- Energy
- Environmental Policy & Management
- Human Capital Management
- Human Rights
- Information Security/Cybersecurity & System Availability
- Labor Practices
- Materiality
- Occupational Health & Safety
- Community Relations
- Product Stewardship
- Risk & Crisis Management
- Supply Chain Management
- Tax Strategy
- Transparency & Reporting
- Waste & Pollutants
- Water
- Innovation Management
- Other, please specify

Please specify:

2nd priority improvement topic
- Biodiversity
- Business Ethics
- Climate Strategy
- Corporate Governance
- Customer Relations
- Energy
- Environmental Policy & Management
- Human Capital Management
- Human Rights
- Information Security/Cybersecurity & System Availability
- Labor Practices
- Materiality
- Occupational Health & Safety
- Community Relations
- Product Stewardship
- Risk & Crisis Management
- Supply Chain Management
- Tax Strategy
- Transparency & Reporting
- Waste & Pollutants
- Water
- Innovation Management
- Other, please specify

Please specify:

3rd priority improvement topic
- Biodiversity
- Business Ethics
- Climate Strategy
- Corporate Governance
- Customer Relations
- Energy
- Environmental Policy & Management
- Human Capital Management
- Human Rights
- Information Security/Cybersecurity & System Availability
- Labor Practices
- Materiality
- Occupational Health & Safety
- Community Relations
- Product Stewardship
- Risk & Crisis Management
- Supply Chain Management
- Tax Strategy
- Transparency & Reporting
- Waste & Pollutants
- Water
- Innovation Management
- Other, please specify

Please specify:
Is there any topic material to your company which has not been addressed in the CSA?

### 5.3 Platform Development Input

The functionality of the CSA platform is constantly evolving. We want to develop the features that are the most important to participating companies. Your input and ideas help us to prioritize our development pipeline. Please rank (1 = most important, 6 = least important) the platform components provided in the drop down menu below which you would most like to see further developed. Choose “other” if you would like to suggest a new feature for an element not included in the list.

<table>
<thead>
<tr>
<th>Rank of importance (1 = most important, 6 = least important)</th>
<th>Platform feature</th>
<th>Please describe what functionality you would benefit from</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Questionnaire layout</td>
<td>❌ Document management</td>
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<td>❌ User management</td>
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<td>❌ PDF export</td>
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<td></td>
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</tr>
</tbody>
</table>

### 5.4 CSA and Investor Relations

Do you pro-actively refer to your CSA results in your discussions with investors and analysts?

- **A. CSA/ESG Score**
  - Yes
  - No

- **B. CSA data**
  - Yes
  - No

- **C. Relative industry position**
  - Yes
  - No

Do investors/analysts inquire about your CSA results?

- **A. CSA/ESG Score**
  - Always
  - Often
  - Sometimes
5.5 Link to Performance Based Compensation and Sustainability Investments

CSA Performance link to compensation
Is your company’s CSA performance linked to executive or top management compensation?
- Yes
- No

Is your company’s CSA performance linked to your compensation or the compensation of your team?
- Yes
- No

5.6 Reporting Process

How many employees used the online assessment interface this year? We offer an option to limit access to certain sections of the questionnaire and would like to understand if companies use this option to provide access or if different persons log in under the same login. Please indicate the number of employees who actively logged into your company’s account to enter information.

How many employees were involved in collecting the data requested in the questionnaire? Please indicate the total number of employees involved in the data collection process related to filling out the CSA. It should not include employees who collected data for which the primary purpose was not the questionnaire. For example, site managers who collected environmental data for other corporate reporting purposes.

How many hours (i.e. total amount of time spent in hours) do you estimate were necessary to fill out the questionnaire this year?

Do you believe that the effort needed to fill out the questionnaire has increased or decreased compared to last year?
Please select a value from the dropdown list
1 = Effort decreased significantly
6 = Effort increased significantly
Were the questions and help texts easy to understand and did they provide useful support when filling out the questionnaire?

Please select a value from the dropdown list
1 = Very difficult to understand and not useful
6 = Very easy to understand and very useful

5.7 Other Feedback

Please provide any other feedback that you might have related to the content of the questionnaire or the assessment process in the text box below.