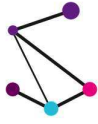


SEYYOND



Seeyond

Collaborative Engagement Report

2021

This document is intended for professional and non-professional clients in accordance with MIFID.



SEYOND



2021

**ENGAGEMENT
REPORT**





TABLE OF CONTENTS

TABLE OF CONTENTS.....	2
ENGAGEMENT STRATEGY	3
SEAYOND'S STRATEGY FOR ENGAGEMENT.....	3
THE NORM-BASED ENGAGEMENT PROCESS	4
INITIATING ENGAGEMENT	4
CONDUCTING EFFECTIVE ENGAGEMENT DIALOGUE.....	4
ELICITING RESPONSES FROM NON-RESPONSIVE COMPANIES	5
2021 ENGAGEMENTS STATISTICS	6
ENGAGEMENT THEMES IN 2021	7
2021 ENGAGEMENT DETAILS.....	8
DIALOGUES HELD DURING 2021	9
UNRESPONSIVE COMPANIES AS OF 31 DECEMBER 2021	42
ENGAGEMENTS CLOSED IN 2021	62
COMPANIES UNRESPONSIVE TO LONG-STANDING CONTROVERSIES	76
Appendix A.....	79
NORM-BASED ENGAGEMENT	79



ENGAGEMENT STRATEGY

SEAYOND'S STRATEGY FOR ENGAGEMENT

As a quantitative asset manager, Seayond has designed an active ownership policy consistent with its model-based approaches to portfolio construction on the one hand and its commitments as a UNPRI signatory on the other hand.

In order to reinforce its commitment to Principle 5 of the UN PRI, Seayond has chosen to complete its voting policy with collaborative engagement. Through ISS's Norm-Based Engagement Solution, Seayond takes part of targeted initiatives selected based on the main international normative standards (guidelines established by the OECD, the ILO, the UN Global Compact or the UN Guiding Principles on Business and Human Rights).

Seayond uses the Norm-Based Engagement Solution of ISS ESG to help facilitate its engagement activities. For more information about ISS ESG and the Norm-Based Engagement Solution, we refer you to Appendix A to this report.

THE NORM-BASED ENGAGEMENT PROCESS

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

INITIATING ENGAGEMENT

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

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

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



Figure 1: Simplified Norm-Based Engagement process.

CONDUCTING EFFECTIVE ENGAGEMENT DIALOGUE

Norm-Based Engagement aims to build relationships that facilitate constructive dialogue, enabling investors to exercise their influence as owners. ISS ESG's Norm-Based Engagement approach encourages companies to elaborate on efforts taken to design and implement better risk management



systems to minimize the risk for re-occurrence of failures to respect international norms. Through the solution, information is sought on whether a company has proven successful in implementing a genuine reduction in risk.

ELICITING RESPONSES FROM NON-RESPONSIVE COMPANIES

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



Figure 2: Simplified Norm-Based Engagement timeline.

2021 ENGAGEMENTS STATISTICS

SEAYOND participated in 132 separate company engagements held during 2021, covering 203 individual ESG topics. The engagements were facilitated by SEAYOND's ESG service provider, ISS ESG. The statistics below present an overview of companies' subject to engagement outreach. 56% of 132 companies provided responses to the investor outreach.

Charts 1-4: Summary charts of engagements conducted between 1 January and 31 December 2021

Chart 1

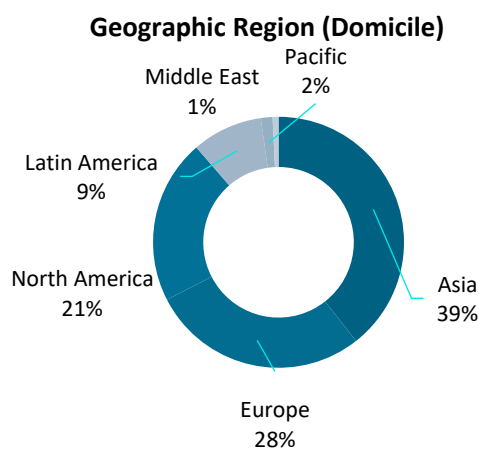


Chart 2

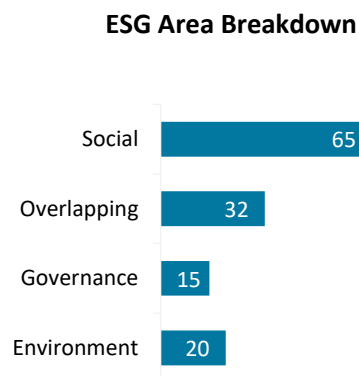


Chart 3

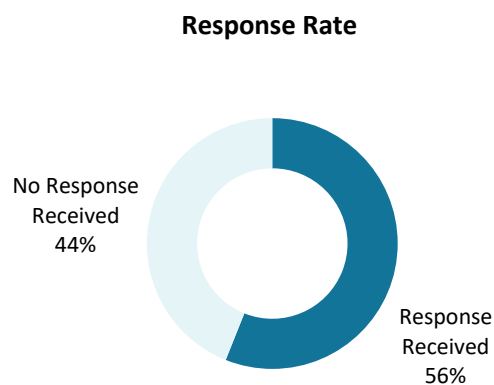
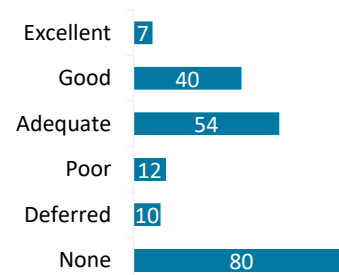


Chart 4

Quality of Participation







ENGAGEMENT THEMES IN 2021

In 2021, ISS ESG was mandated to represent clients under the Norm-Based Engagement Solution¹ in engagement on environmental, social, and governance issues with 134 companies covering 206 individual ESG topics, across more than 46 different locations.

The engagements are categorised under the four United Nations (UN) Global Compact areas: human rights, labour rights, environment, and anti-corruption. Poor stakeholder consultation, and concerns regarding the right to life, especially related to consumer health, were the key topics under human rights. Workplace health and safety was the dominant labour rights theme, with union rights following. The majority of environment-focused engagements related to corporate management of incidences involving loss of biodiversity, as well as climate change and pollution (air, water, and soil). For companies facing controversies related to norms for anti-corruption, engagement focused on their efforts to address reported incidences of bribery and money laundering.

The following table provides an overview of major engagement themes in 2021.

Table 1: Major engagement themes in 2021 based on topic area (multiple topic areas may be relevant under an individual engagement)

UN GLOBAL COMPACT PRINCIPLES	NORM AREA	TOPIC AREA
1-2	 Human Rights	Poor stakeholder consultation
		Consumer health and rights
3-6	 Labour Rights	Workplace health and safety
		Union rights
7-9	 Environment	Depletion of biodiversity
		Climate change
10	 Anti-Corruption	Bribery
		Money laundering

¹ In November 2021, ISS ESG renamed its longstanding Pooled Engagement Solution to Norm-Based Engagement Solution.



2021 ENGAGEMENT DETAILS

ENGAGEMENTS IN 2021

The following section provides information on all engagement dialogues held during 2021. The tables present the milestones achieved for each of the engagement objectives set when the engagement cycle was initiated.

ISS ESG uses the following category of goals and milestones to measure progress and success of the engagement:


Engagement Goals	Disclosure of Relevant Information	Milestones	Credible Measures Adopted
	Termination of Problematic Practices		Measures Initiated
	Implementation of Relevant Policies		Commitment Expressed
	Remedial Action		No Measures Announced


For companies that did not provide an initial response, reminders were submitted to the investor relations department, to the attention of the CEO and, ultimately, to the attention of the Board Chairperson within a 12-month period. For these companies, information is provided on the status of the reminder and escalation process in a subsequent chapter.




DIALOGUES HELD DURING 2021

Accenture Plc			ISIN IE00B4BNMY34
	SDG ALIGNMENT SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers		QUARTER Q3 2020
THEME Workplace health and safety			LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed	
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced	
ACS Actividades de Construccion y Servicios SA			ISIN ES0167050915
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world’s cultural and natural heritage SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels		QUARTER Q1 2021
THEME Depletion of biodiversity, environmental impact			LOCATION Canada
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced	
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced	
THEME Indigenous rights			LOCATION Canada
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced	
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced	

Aecon Group Inc.			ISIN CA00762V1094
	SDG ALIGNMENT		QUARTER Q1 2021
	SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world’s cultural and natural heritage		
	SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetland		
	SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels, mountains and drylands		
THEME Biodiversity, Environmental impacts			LOCATION Canada
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated	
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced	
THEME Indigenous rights, Living standards			LOCATION Canada
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated	
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced	


Albemarle Corporation			ISIN US012653AA94
	SDG ALIGNMENT		QUARTER Q1 2021
	SDG 6: Clean Water and Sanitation; 6.1: Universal and equitable access to safe and affordable drinking water		
	SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage		
	SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands		
	SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels		
THEME Biodiversity, Environmental impacts			LOCATION Chile
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated	
	TERMINATION OF PRACTICE	REMEDIAL ACTION	

	Measures initiated	Measures initiated
THEME		LOCATION
Indigenous rights, Living standards		Chile
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed


Alphabet Inc.		ISIN US02079K1079
	SDG ALIGNMENT SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q3 2021
THEME		LOCATION
Anti-competitive behaviour		Several countries
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated
THEME		LOCATION
Consumer privacy, Consumer rights		France
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated
THEME		LOCATION
Workplace health and safety		United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed


ALROSA PJSC		ISIN RU0007252813
	SDG ALIGNMENT	QUARTER

	SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	Q2 2021
THEME Environmental impacts, Pollution, Water pollution		LOCATION Russia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated

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


THEME		LOCATION
Working conditions, Workplace health and safety, Union rights		Italy
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	No measures announced	No measures announced
	No measures announced	No measures announced
THEME		LOCATION
Working conditions, Workplace health and safety, Union rights		Spain
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	No measures announced	No measures announced
	No measures announced	No measures announced

ArcelorMittal SA		ISIN
		US03938LAL80
	SDG ALIGNMENT SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species	QUARTER Q1 2021
THEME		LOCATION
Air pollution		Kazakhstan
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	No measures announced	No measures announced
	No measures announced	No measures announced
THEME		LOCATION
Air pollution		France
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	No measures announced	No measures announced
	No measures announced	No measures announced

BHP Group Limited		ISIN
		AU000000BHP4
	SDG ALIGNMENT SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials	QUARTER Q1 2021



	SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands		
THEME Environmental impacts, Soil and water pollution			LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Credible measures adopted	
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated	
THEME Depletion of biodiversity			LOCATION Chile
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Credible measures adopted	
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated	

BHP Group Plc			ISIN GB0000566504
	<p>SDG ALIGNMENT</p> <p>SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials</p> <p>SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes</p> <p>SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands</p>		QUARTER Q1 2021
THEME Environmental impacts, Soil and water pollution			LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Credible measures adopted	
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated	
THEME Depletion of biodiversity			LOCATION Chile
	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Credible measures adopted	




GOALS SET & MILESTONES ACHIEVED	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated
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boohoo group Plc		ISIN JE00BG6L7297
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers SDG 10: Reduced Inequalities; 10.7: Facilitate orderly, safe, regular and responsible migration	QUARTER Q4 2020
THEME Forced labour, Modern slavery		LOCATION United Kingdom
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated


Capital One Bank (USA), NA		ISIN US14040EHG08
	SDG ALIGNMENT N/A	QUARTER Q1 2021
THEME Consumer privacy, Consumer rights, Cybersecurity		LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

Capital One Financial Corporation		ISIN US14040HAS40
	SDG ALIGNMENT N/A	QUARTER Q1 2021
THEME Consumer privacy, Consumer rights, Cybersecurity		LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

THEME Consumer privacy, Consumer rights, Cybersecurity		LOCATION Canada
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated

Capital One, NA		ISIN US14042E3V09
	SDG ALIGNMENT N/A	QUARTER Q1 2021
THEME Consumer privacy, Consumer rights, Cybersecurity		LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated


Cargill, Inc.		ISIN US141781AX24
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers SDG 15: Life on Land; 15.2: Sustainable management of all types of forests, SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species	QUARTER Q3 2020 & Q4 2021
THEME Union rights		LOCATION Turkey
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated
THEME Depletion of biodiversity, Deforestation		LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Measures initiated


CCR SA		ISIN BRCCROACNOR2
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q3 2020
THEME Bribery		LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Credible measures adopted
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated

Centrais Eletricas Brasileiras SA		ISIN BRELETACNOR6
	SDG ALIGNMENT SDG 6: Clean Water and Sanitation; 6.1: Universal and equitable access to safe and affordable drinking water SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q2 2021
THEME Indigenous rights, Living standards		LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated
THEME Depletion of biodiversity		LOCATION Brazil
	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES No measures announced





GOALS SET & MILESTONES ACHIEVED	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated
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China Yangtze Power Co., Ltd.		ISIN CNE000001G87
	<p>SDG ALIGNMENT</p> <p>SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands</p> <p>SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species</p>	QUARTER Q3 2021
THEME Depletion of biodiversity		LOCATION China
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced

Deutsche Bank AG		ISIN DE0003933511
	<p>SDG ALIGNMENT</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.4: Reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organized crime</p>	QUARTER Q3 2021
THEME Money laundering		LOCATION Russia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A
THEME Money laundering		LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES N/A
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A

Deutsche Bank AG /New York Branch/		ISIN US251525AT85
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	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.4: Reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organized crime		QUARTER Q3 2021
THEME Money laundering			LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES N/A	
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A	


Elsewedy Electric Co.			ISIN EGS3G0Z1C014
	<p>SDG ALIGNMENT</p> <p>SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world’s cultural and natural heritage</p> <p>SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species</p>		QUARTER Q2 2021
THEME Deforestation, Depletion of Biodiversity			LOCATION Tanzania
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced	
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced	



Experian Finance Plc			ISIN US30217AAA16
	SDG ALIGNMENT N/A	QUARTER Q1 2021	
THEME Consumer privacy, Consumer rights			LOCATION United Kingdom
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed	
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed	

Experian Plc			ISIN GB00B19NLV48
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	SDG ALIGNMENT N/A	QUARTER Q1 2021
THEME Consumer privacy, Consumer rights, Cybersecurity		LOCATION South Africa
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated
THEME Consumer privacy, Consumer rights		LOCATION United Kingdom
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed
FirstEnergy Corp.		
		ISIN US3379321074
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q2 2021
THEME Bribery		LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated
Freeport-McMoRan, Inc.		
		ISIN US35671D8570
	SDG ALIGNMENT SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q1 2020
THEME Water pollution		LOCATION Indonesia
DISCLOSURE		IMPLEMENTATION OF POLICIES

GOALS SET & MILESTONES ACHIEVED	Measures initiated	Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated
Glencore Plc		ISIN JE00B4T3BW64
	<p>SDG ALIGNMENT</p> <p>SDG 4: Education; 4.1: Ensure that all girls and boys complete free, equitable and quality primary and secondary education leading to relevant and effective learning outcomes</p> <p>SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials</p> <p>SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour</p> <p>SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes</p> <p>SDG 17: Partnerships for the Goals; 17.1: Strengthen domestic resource mobilization</p>	QUARTER Q3 2020
THEME Tax irregularities		LOCATION Australia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced
THEME Modern Slavery		LOCATION Democratic Republic of the Congo
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed
THEME Water Pollution		LOCATION Peru
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE	REMEDIAL ACTION

	Commitment expressed	No measures announced
Golden Agri-Resources Ltd		ISIN MU0117U00026
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q2 2021
THEME Forced displacement, Indigenous rights		LOCATION Liberia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated
THEME Indigenous rights, Stakeholder consultation		LOCATION Indonesia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated
Google LLC		ISIN US38259PAA03
	SDG ALIGNMENT SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q3 2021
THEME Working conditions, Workplace health and safety		LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed
THEME Anti-competitive behaviour		LOCATION Several countries




GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated
THEME Consumer privacy, Consumer rights		LOCATION France
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated

Hochtief AG		ISIN DE0006070006
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q1 2021
THEME Depletion of biodiversity, Environmental impacts		LOCATION Canada
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced
THEME Indigenous rights, Living standards, Stakeholder consultation		LOCATION Canada
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed


HUGO BOSS AG		ISIN DE0005245534
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	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers		QUARTER Q1 2021
	THEME Union rights, Working conditions		LOCATION Turkey
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated	
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated	

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

Jardine Cycle & Carriage Limited			ISIN SG1B51001017
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	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.3: Inclusive and sustainable urbanization, SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world’s cultural and natural heritage SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels		QUARTER Q2 2021
THEME Indigenous rights, Stakeholder consultation			LOCATION Indonesia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed	
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Commitment expressed	

Jardine Matheson Holdings Ltd.			ISIN BMG507361001
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.3: Inclusive and sustainable urbanization SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels		QUARTER Q2 2021
	THEME Indigenous rights, Stakeholder consultation		LOCATION Indonesia
	GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed TERMINATION OF PRACTICE N/A	IMPLEMENTATION OF POLICIES Commitment expressed REMEDIAL ACTION Commitment expressed

Jardine Strategic Holdings Ltd.			ISIN BMG507641022
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.3: Inclusive and sustainable urbanization SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels		QUARTER Q2 2021
	THEME Indigenous rights, Stakeholder consultation		LOCATION Indonesia
DISCLOSURE		IMPLEMENTATION OF POLICIES	




GOALS SET & MILESTONES ACHIEVED	Commitment expressed	Commitment expressed
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Commitment expressed


Korea Electric Power Corp.		ISIN KR7015760002
	<p>SDG ALIGNMENT</p> <p>SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels</p>	QUARTER Q3 2021
THEME Indigenous rights, Living standards		LOCATION Laos
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated


Korea Western Power Co., Ltd.		ISIN CH0419040875
	<p>SDG ALIGNMENT</p> <p>SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels</p>	QUARTER Q3 2021
THEME Indigenous rights, Living standards		LOCATION Laos
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated

Korian SA		ISIN FR0010386334
	<p>SDG ALIGNMENT</p> <p>SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels</p>	QUARTER Q4 2020

THEME		LOCATION
Consumer health and safety		France
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

LG Chem Ltd.		ISIN KR7051911006
	SDG ALIGNMENT SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages	QUARTER Q4 2020
THEME		LOCATION
Right to life		India
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated


Lonza Group AG		ISIN CH0013841017
	SDG ALIGNMENT SDG 13: Climate Action; 13.3: Improve education, awareness-raising and human and institutional capacity on climate change	QUARTER Q3 2021
THEME		LOCATION
Air pollution, Climate change impacts		Switzerland
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Credible measures adopted	REMEDIAL ACTION Measures initiated


Lyft, Inc.		ISIN US55087P1049
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.5: Achieve full and productive employment and decent work for all women and men SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q1 2020




	SDG 10: Reduced Inequalities; 10.1: Achieve and sustain income growth		
THEME Working conditions			LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced	
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced	

McDonald's Corporation			ISIN US58013MEE03
	<p>SDG ALIGNMENT</p> <p>SDG 5: Gender Equality; 5.2: Eliminate all forms of violence against all women and girls</p> <p>SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers</p> <p>SDG 10: Reduced Inequalities; 10.3: Equal opportunities of outcome, SDG 5: Gender Equality; 5.1: End all forms of discrimination against all women and girls</p>	QUARTER Q4 2020	
THEME Gender discrimination			LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed	
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated	

Pegatron Corp.			ISIN TW0004938006
	<p>SDG ALIGNMENT</p> <p>SDG 8: Decent Work and Economic Growth; 8.5: Achieve full and productive employment and decent work for all women and men</p> <p>SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers</p>		QUARTER Q1 2021
THEME Workplace health and safety			LOCATION China
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced	
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed	

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


POSCO			ISIN US6934831099
	SDG ALIGNMENT SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services SDG 2: Zero Hunger; 2.1: End hunger and ensure access by all people to safe, nutritious and sufficient food SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers SDG 15: Life on Land; 15.2: Sustainable management of all types of forests SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world’s cultural and natural heritage SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels		QUARTER Q1 2019 & Q3 2021
	THEME Forced displacement, Human rights due diligence, Living standards		LOCATION Myanmar
	DISCLOSURE Commitment expressed		IMPLEMENTATION OF POLICIES Commitment expressed



GOALS SET & MILESTONES ACHIEVED	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION N/A
THEME Depletion of biodiversity, Deforestation		LOCATION Indonesia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Credible measures adopted	REMEDIAL ACTION Measures initiated
THEME Union rights		LOCATION Turkey
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed
THEME Indigenous rights, Stakeholder consultation		LOCATION Indonesia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION No measures announced
THEME Workplace health and safety		LOCATION South Korea
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed

POSCO INTERNATIONAL Corp.		ISIN KR7047050000
	SDG ALIGNMENT SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services SDG 2: Zero Hunger; 2.1: End hunger and ensure access by all people to safe, nutritious and sufficient food SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage	QUARTER Q1 2019 & Q3 2021



	SDG 15: Life on Land; 15.2: Sustainable management of all types of forests, SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species		
	SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels		
THEME Forced displacement, Human rights due diligence, Living standards			LOCATION Myanmar
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced	
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION N/A	
THEME Depletion of biodiversity, Deforestation			LOCATION Indonesia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Credible measures adopted	
	TERMINATION OF PRACTICE Credible measures adopted	REMEDIAL ACTION Measures initiated	
THEME Union rights			LOCATION Turkey
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed	
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed	
THEME Indigenous rights, Stakeholder consultation			LOCATION Indonesia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed	
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION No measures announced	
PT Astra Agro Lestari Tbk			ISIN ID1000066004
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.3: Inclusive and sustainable urbanization SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage		QUARTER Q2 2021





	SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	
THEME Indigenous rights, Stakeholder consultation		LOCATION Indonesia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Commitment expressed


PT Astra International Tbk		ISIN ID1000057607
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.3: Inclusive and sustainable urbanization SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q2 2021
THEME Indigenous rights, Stakeholder consultation		LOCATION Indonesia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Commitment expressed

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


Ratch Group Public Co. Ltd.		ISIN
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			TH0637010008
	SDG ALIGNMENT SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels		QUARTER Q4 2021
THEME Right to health, Indigenous rights			LOCATION Laos
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced	
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated	


Raytheon Technologies Corp.			ISIN ARDEUT110384
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.1: Reduce all forms of violence and related death rates everywhere		QUARTER Q1 2021
THEME Human rights due diligence, Military / security supplies			LOCATION Yemen
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced	
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION N/A	

Samarco Mineracao SA			ISIN BRFDS05ZC689
	SDG ALIGNMENT SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes		QUARTER Q1 2021
THEME Water and soil pollution			LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated	
	TERMINATION OF PRACTICE	REMEDIAL ACTION	


	No measures announced	No measures announced
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SAP SE		ISIN DE0007164600
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q4 2021
THEME Bribery		LOCATION South Africa
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES N/A
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A


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


Serco Group Plc		ISIN GB0007973794
	SDG ALIGNMENT SDG 10: Reduced Inequalities; 10.7: Facilitate orderly, safe, regular and responsible migration SDG 16: Peace, justice and Strong Institutions; 16.1: Reduce all forms of violence and related death rates everywhere	QUARTER Q3 2021
THEME Human rights due diligence, Torture / inhumane treatment		LOCATION Australia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE	REMEDIAL ACTION

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

SK Inc.		ISIN KR7034730002
	SDG ALIGNMENT SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q4 2021
THEME Indigenous rights, Living standards, Right to health, Right to life, Stakeholder consultation		LOCATION Laos
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced

SNC-Lavalin Group Inc.		ISIN CA78460T1057
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands	QUARTER Q1 2021

SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels		
THEME Indigenous rights, Living standards, Stakeholder consultation		LOCATION Canada
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced
THEME Depletion of biodiversity, Environmental impacts		LOCATION Canada
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment Expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced
Sociedad Quimica y Minera de Chile SA		ISIN USP8718AAC01
	SDG ALIGNMENT SDG 6: Clean Water and Sanitation; 6.1: Universal and equitable access to safe and affordable drinking water SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q1 2021
THEME Depletion of biodiversity, Environmental impacts		LOCATION Chile
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment Expressed	REMEDIAL ACTION Measures initiated
THEME Indigenous rights, Living standards		LOCATION Chile
	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment Expressed




GOALS SET & MILESTONES ACHIEVED	TERMINATION OF PRACTICE Commitment Expressed	REMEDIAL ACTION Commitment Expressed
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Swedbank AB		ISIN SE0001877739
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.4: Reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organized crime	QUARTER Q4 2021
THEME Money laundering		LOCATION Several countries
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated


Teck Resources Limited		ISIN CA8787422044
	SDG ALIGNMENT SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q1 2021
THEME Depletion of biodiversity, Water pollution		LOCATION Canada
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

Top Glove Corp. Bhd.		ISIN MYL711300003
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour	QUARTER Q2 2021
THEME Forced labour, Workplace health and safety		LOCATION Malaysia


GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated


TPI - Triunfo Participacoes e Investimentos SA		ISIN BRTPIACNOR8
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q1 2021
THEME Bribery		LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A

Transneft PJSC		ISIN RU0009091573
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands	QUARTER Q4 2021
THEME Water and soil pollution		LOCATION Russia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced

Tyson Foods, Inc.		ISIN US9024941034
	SDG ALIGNMENT SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q4 2020


THEME Workplace health and safety		LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION No measures announced

United States Steel Corporation		ISIN US912656AG05
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q1 2021
THEME Air pollution, Right to health		LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION No measures announced

Vale SA		ISIN US91912E1055
	SDG ALIGNMENT SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services SDG 2: Zero Hunger; 2.1: End hunger and ensure access by all people to safe, nutritious and sufficient food, SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages SDG 6: Clean Water and Sanitation; 6.1: Universal and equitable access to safe and affordable drinking water SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q2 2021



	SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels		
THEME Environmental impacts, Water pollution			LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Credible measures adopted	
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated	
THEME Indigenous rights, Living standards			LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed	
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated	
THEME Workplace health and safety			LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated	
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated	



Vestas Wind Systems A/S			ISIN DK0010268606
	<p>SDG ALIGNMENT</p> <p>SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services</p> <p>SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world’s cultural and natural heritage</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels</p>		QUARTER Q3 2021
THEME Indigenous rights, Living standards, Stakeholder consultation			LOCATION Kenya
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced	
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Commitment expressed	



Voith GmbH & Co. KGaA			ISIN DED8884#AC03
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world’s cultural and natural heritage SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels		QUARTER Q1 2021
	THEME Depletion of biodiversity, Environmental impacts		
	LOCATION Canada		
	GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	
TERMINATION OF PRACTICE No measures announced		REMEDIAL ACTION No measures announced	
THEME Indigenous rights, Living standards			LOCATION Canada
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated	
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced	

UNRESPONSIVE COMPANIES AS OF 31 DECEMBER 2021

AcBel Polytech, Inc.		ISIN TW0006282007
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour	QUARTER Q4 2020
	THEME Forced labour, Modern slavery	LOCATION China
STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.		
Acciona SA		ISIN ES0125220311
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage	QUARTER Q1 2021
	SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	
THEME Biodiversity, Environmental impacts		LOCATION Spain
STATUS OF ENGAGEMENT The company has yet to respond to outreach in Q1 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its Board of Directors on 2 December 2021.		
THEME Indigenous rights, Living standards		LOCATION Spain
STATUS OF ENGAGEMENT The company has yet to respond to outreach in Q1 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its Board of Directors on 2 December 2021.		
Ackermans & van Haaren NV		ISIN BE0003764785
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q4 2021

THEME Bribery	LOCATION Russia
STATUS OF ENGAGEMENT The company has yet to respond to outreach from Q4 2021. As such, it is subject to the reminder and escalation process in 2022.	
Airbus SE	ISIN NL0000235190
SDG ALIGNMENT  SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers  SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	
QUARTER Q3 2021	
THEME Union rights	LOCATION United States
STATUS OF ENGAGEMENT The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its Investor Relations Department on 28 December 2021.	
THEME Bribery	LOCATION China
STATUS OF ENGAGEMENT The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its Investor Relations Department on 28 December 2021.	
THEME Bribery	LOCATION Ghana
STATUS OF ENGAGEMENT The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its Investor Relations Department on 28 December 2021.	
THEME Bribery	LOCATION Nepal
STATUS OF ENGAGEMENT The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its Investor Relations Department on 28 December 2021.	
THEME Bribery	LOCATION United Arab Emirates
STATUS OF ENGAGEMENT	

The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its Investor Relations Department on 28 December 2021.

THEME
Bribery

LOCATION
Sri Lanka

STATUS OF ENGAGEMENT

The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its Investor Relations Department on 28 December 2021.

THEME
Bribery

LOCATION
Taiwan

STATUS OF ENGAGEMENT

The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its Investor Relations Department on 28 December 2021.

THEME
Bribery

LOCATION
Malaysia

STATUS OF ENGAGEMENT

The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its Investor Relations Department on 28 December 2021.

THEME
Bribery

LOCATION
Kuwait

STATUS OF ENGAGEMENT

The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its Investor Relations Department on 28 December 2021.

Alibaba Group Holding Ltd.

ISIN
KYG017191068



SDG ALIGNMENT
N/A

QUARTER
Q3 2021

THEME
Anti-competitive behaviour

LOCATION
China

STATUS OF ENGAGEMENT

The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its Investor Relations Department on 28 December 2021.




Almirall SA

ISIN
ES0157097017



SDG ALIGNMENT

QUARTER
Q4 2021

SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	
THEME Bribery	LOCATION United States
STATUS OF ENGAGEMENT The company has yet to respond to outreach from Q4 2021. As such, it is subject to the reminder and escalation process in 2022.	
Aziyo Biologics, Inc.	
ISIN US05479K1060	
SDG ALIGNMENT  SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages	QUARTER Q4 2021
THEMES Consumer health and safety, Consumer rights, Right to life	LOCATION United States
STATUS OF ENGAGEMENT The company has yet to respond to outreach from Q4 2021. As such, it is subject to the reminder and escalation process in 2022.	
Banglalink Digital Communications Ltd.	
ISIN US059897AA67	
SDG ALIGNMENT  SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q4 2021
THEMES Union rights	LOCATION Bangladesh
STATUS OF ENGAGEMENT The company has yet to respond to outreach from Q4 2021. As such, it is subject to the reminder and escalation process in 2022.	
BLD Plantation Bhd.	
ISIN MYL506900009	
SDG ALIGNMENT  SDG 15: Life on Land; 15.2: Sustainable management of all types of forests	QUARTER Q4 2021
THEME Biodiversity, Climate change impacts, Deforestation	LOCATION Malaysia
STATUS OF ENGAGEMENT	

The company has yet to respond to outreach from Q4 2021. As such, it is subject to the reminder and escalation process in 2022.

Changhong Meiling Co., Ltd.

ISIN
CNE000000BT4



SDG ALIGNMENT

SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour

QUARTER
Q4 2020

THEME

Human rights due diligence: Forced labour, Modern slavery, Religious affiliation discrimination

LOCATION
China

STATUS OF ENGAGEMENT

As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.

China National Chemical Corp. Ltd.

ISIN
CND100005L10



SDG ALIGNMENT

SDG 3: Good Health and Wellbeing; 3.9: Reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination

SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages

SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species

QUARTER
Q2 2021

THEME

Biodiversity, Environmental impacts

LOCATION
China

STATUS OF ENGAGEMENT

The company did not respond to outreach in Q2 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its Board of Directors on 17 December 2021.

THEME

Human rights due diligence, Right to health, Right to life




LOCATION
China

STATUS OF ENGAGEMENT

The company did not respond to outreach in Q2 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its Board of Directors on 17 December 2021.

China National Petroleum Corp.

ISIN
CND100002XJ6

	<p>SDG ALIGNMENT</p> <p>SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials</p> <p>SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes</p>	<p>QUARTER Q4 2021</p>
	<p>THEME Soil and water pollution</p>	<p>LOCATION China</p>
	<p>STATUS OF ENGAGEMENT The company has yet to respond to outreach from Q4 2021. As such, it is subject to the reminder and escalation process in 2022.</p>	
<p>China Three Gorges Corp..</p>		<p>ISIN CND0000003D1</p>
	<p>SDG ALIGNMENT</p> <p>SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services</p> <p>SDG 2: Zero Hunger; 2.1: End hunger and ensure access by all people to safe, nutritious and sufficient food</p> <p>SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage</p> <p>SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands</p> <p>SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels</p>	<p>QUARTER Q3 2021</p>
	<p>THEME Forced displacement, Indigenous rights, Living standards, Stakeholder consultation</p>	<p>LOCATION Brazil</p>
	<p>STATUS OF ENGAGEMENT The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 28 December 2021.</p>	
	<p>THEME Forced displacement, Living standards, Stakeholder consultation</p>	<p>LOCATION Guinea</p>
	<p>STATUS OF ENGAGEMENT The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 28 December 2021.</p>	
	<p>THEME Biodiversity, Environmental impacts</p>	<p>LOCATION China</p>
<p>STATUS OF ENGAGEMENT</p>		

The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 28 December 2021.

Coal India Ltd.

ISIN
INE522F01014

SDG ALIGNMENT

SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages

SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials



SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers

SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes

SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands

QUARTER
Q4 2021

THEME

Air pollution, Pollution, Water pollution

LOCATION

India

STATUS OF ENGAGEMENT

The company has yet to respond to outreach from Q4 2021. As such, it is subject to the reminder and escalation process in 2022.

THEME

Workplace health and safety

LOCATION

India

STATUS OF ENGAGEMENT

The company has yet to respond to outreach from Q4 2021. As such, it is subject to the reminder and escalation process in 2022.

Companhia de Saneamento do Parana

ISIN
BRSAPRACNOR9



SDG ALIGNMENT

SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials

SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes

QUARTER
Q3 2021

THEME


Water pollution


LOCATION

Brazil

STATUS OF ENGAGEMENT


The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 28 December 2021.


Companhia Energetica de Minas Gerais SA		ISIN BRCMIGACNPR3
	SDG ALIGNMENT SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services	QUARTER Q2 2021
	SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands	
	SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species	
	SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	
THEME Forced displacement, Indigenous rights, Living standards, Right to health, Stakeholder consultation		LOCATION Brazil
STATUS OF ENGAGEMENT The company did not respond to outreach in Q2 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 17 December 2021.		
THEME Biodiversity, Environmental impacts		LOCATION Brazil
STATUS OF ENGAGEMENT The company did not respond to outreach in Q2 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 17 December 2021.		


Daqo New Energy Corp.		ISIN US23703Q1040
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour	QUARTER Q3 2021
THEME Forced labour, Human rights due diligence, Modern slavery		LOCATION China
STATUS OF ENGAGEMENT The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 28 December 2021.		

Ecopetrol SA		ISIN COC04PA00016
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q3 2021
	SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials	
THEME Union Rights		LOCATION Colombia
STATUS OF ENGAGEMENT The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 28 December 2021.		
THEME Biodiversity, Oil spill, Pollution, Right to health, Soil pollution, Water pollution		LOCATION Colombia
STATUS OF ENGAGEMENT The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 28 December 2021.		
Gazprom Neft PJSC		ISIN RU0009062467
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q4 2021
	SDG 14: Life Below Water; 14.2: Sustainably manage and protect marine and coastal ecosystems	
THEME Environmental impacts, Oil spill, Pollution, Water pollution		LOCATION Russia
STATUS OF ENGAGEMENT The company has yet to respond to outreach from Q4 2021. As such, it is subject to the reminder and escalation process in 2022.		
GCL-Poly Energy Holdings Limited		ISIN KYG3774X1088
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour	QUARTER Q3 2021

THEME Forced labour, Human rights due diligence, Modern slavery	LOCATION China
STATUS OF ENGAGEMENT The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 28 December 2021.	

Haixiangni Health Food Co., Ltd.		ISIN CNE1000012Z2
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour	QUARTER Q4 2020
THEME Forced labour, Human rights due diligence, Modern slavery, Religious affiliation discrimination		LOCATION China
STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.		

Hon Hai Precision Industry Co., Ltd.		ISIN CNE000001PN5
	<p>SDG ALIGNMENT</p> <p>SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers</p> <p>SDG 10: Reduced Inequalities; 10.1: Achieve and sustain income growth, SDG 8: Decent Work and Economic Growth; 8.5: Achieve full and productive employment and decent work for all women and men</p>	<p>QUARTER</p> <p>Q4 2020</p>
<p>THEMES</p> <p>Working conditions, Forced labour, Workplace health and safety, Living wage</p>		<p>LOCATIONS</p> <p>China</p>
<p>STATUS OF ENGAGEMENT</p> <p>As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.</p>		

Jiangsu Guotai International Group Co., Ltd.		ISIN CNE000001PN5
SDG ALIGNMENT  SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour	QUARTER Q4 2020	
THEMES	LOCATIONS	

Forced labour, Human rights due diligence, Modern slavery, Religious affiliation discrimination	China
<p>STATUS OF ENGAGEMENT</p> <p>As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.</p>	

Jihua Group Corp. Ltd.	ISIN CNE100000SK6
<p>SDG ALIGNMENT</p> <p>SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour</p>	QUARTER Q3 2021
<p>THEME</p> <p>Forced labour, Human rights due diligence, Modern slavery, Religious affiliation discrimination</p>	LOCATION China
<p>STATUS OF ENGAGEMENT</p> <p>The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 28 December 2021.</p>	

JinkoSolar Holding Co., Ltd.	ISIN KY47759T2095
<p>SDG ALIGNMENT</p> <p>SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour</p>	QUARTER Q3 2021
<p>THEME</p> <p>Forced labour, Human rights due diligence, Modern slavery, Religious affiliation discrimination</p>	LOCATION China
<p>STATUS OF ENGAGEMENT</p> <p>The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 28 December 2021.</p>	

Lens Technology Co., Ltd.	ISIN CNE100001YW7
<p>SDG ALIGNMENT</p> <p>SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour</p>	QUARTER Q3 2021
<p>THEME</p> <p>Forced labour, Human rights due diligence, Modern slavery, Religious affiliation discrimination</p>	LOCATION China

STATUS OF ENGAGEMENT

The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 28 December 2021.

Lingui Developments Bhd.

ISIN
MYL201100004

SDG ALIGNMENT

SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage



SDG 15: Life on Land; 15.2: Sustainable management of all types of forests, SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species

SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels

QUARTER
Q3 2020

THEME

Indigenous rights, Stakeholder consultation

LOCATIONS
Malaysia

STATUS OF ENGAGEMENT

As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.

THEME

Biodiversity, Deforestation

LOCATIONS
Malaysia

STATUS OF ENGAGEMENT

As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.

Meta Platforms, Inc.

ISIN
US30303M1027

SDG ALIGNMENT

SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages



SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers

QUARTER
Q3 2021

THEMES

Working conditions, Workplace health and safety

LOCATION
United States

STATUS OF ENGAGEMENT

The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 28 December 2021.

THEMES

Working conditions, Workplace health and safety

LOCATION
Ireland

STATUS OF ENGAGEMENT

The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 28 December 2021.

NLC India Ltd.

ISIN
INE215901013



SDG ALIGNMENT

SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages

SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers

QUARTER
Q4 2021

THEME

Workplace health and safety

LOCATION
India

STATUS OF ENGAGEMENT

The company has yet to respond to outreach from Q4 2021. As such, it is subject to the reminder and escalation process in 2022.

OFILM Group Co., Ltd.

ISIN
CNE100000533



SDG ALIGNMENT

SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour

QUARTER
Q4 2020

THEME

Forced labour, Human rights due diligence, Modern slavery

LOCATION
China

STATUS OF ENGAGEMENT

As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.

Petroleos Mexicanos SA

ISIN
US71654QAW24



SDG ALIGNMENT



SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages



SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials

SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers

SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes


QUARTER
Q4 2021

SDG 14: Life Below Water; 14.2: Sustainably manage and protect marine and coastal ecosystems	
SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands	
THEME	LOCATION
Biodiversity, Oil spill, Pollution, Soil pollution, Water pollution	Mexico
STATUS OF ENGAGEMENT	
The company has yet to respond to outreach from Q4 2021. As such, it is subject to the reminder and escalation process in 2022.	
THEME	LOCATION
Workplace health and safety	Mexico
STATUS OF ENGAGEMENT	
The company has yet to respond to outreach from Q4 2021. As such, it is subject to the reminder and escalation process in 2022.	
Power Construction Corporation of China, Ltd.	
ISIN	
CNE1000017G1	
	SDG ALIGNMENT
	SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage
	SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species
THEME	QUARTER
Biodiversity, Deforestation, Environmental impacts	Q4 2021
STATUS OF ENGAGEMENT	
The company has yet to respond to outreach from Q4 2021. As such, it is subject to the reminder and escalation process in 2022.	
SAIC Motor Corp. Ltd.	
ISIN	
CNE000000TY6	
	SDG ALIGNMENT
	SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour
THEME	QUARTER
Forced labour, Human rights due diligence, Modern slavery	Q4 2020
STATUS OF ENGAGEMENT	
As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.	

Samling Global Ltd.		ISIN BMG7782K1071
	SDG ALIGNMENT	
	SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage	
	SDG 15: Life on Land; 15.2: Sustainable management of all types of forests	QUARTER Q3 2020
	SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species	
SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels		
THEME Indigenous rights		LOCATION Malaysia
STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.		
THEME Biodiversity, Deforestation		LOCATION Malaysia
STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.		
Samsung C&T Corp.		ISIN KR7028260008
	SDG ALIGNMENT	
	SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage	
	SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands	QUARTER Q1 2021
	SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	
THEME Biodiversity, Environmental impacts		LOCATION Canada
STATUS OF ENGAGEMENT The company has yet to respond to outreach in Q1 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its Board of Directors on 2 December 2021.		
THEME		LOCATION

Indigenous rights, Living standards, Stakeholder consultation	Canada
<p>STATUS OF ENGAGEMENT</p> <p>The company has yet to respond to outreach in Q1 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its Board of Directors on 2 December 2021.</p>	

SLC Agricola SA	ISIN BRSCEACNOR2
<p>SDG ALIGNMENT</p> <p> SDG 15: Life on Land; 15.2: Sustainable management of all types of forests</p> <p>SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species</p>	<p>QUARTER</p> <p>Q3 2021</p>
<p>THEME</p> <p>Biodiversity, Climate change impacts, Deforestation, Environmental impacts</p>	<p>LOCATION</p> <p>Brazil</p>
<p>STATUS OF ENGAGEMENT</p> <p>The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 28 December 2021.</p>	

Telefonaktiebolaget LM Ericsson	ISIN XS0307504547
<p>SDG ALIGNMENT</p> <p> SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms</p>	<p>QUARTER</p> <p>Q4 2021</p>
<p>THEME</p> <p>Bribery</p>	<p>LOCATION</p> <p>China</p>
<p>STATUS OF ENGAGEMENT</p> <p>The company has yet to respond to outreach from Q4 2021. As such, it is subject to the reminder and escalation process in 2022.</p>	
<p>THEME</p> <p>Bribery</p>	<p>LOCATION</p> <p>Indonesia</p>
<p>STATUS OF ENGAGEMENT</p> <p>The company has yet to respond to outreach from Q4 2021. As such, it is subject to the reminder and escalation process in 2022.</p>	
<p>THEME</p> <p>Bribery</p>	<p>LOCATION</p> <p>Saudi Arabia</p>
<p>STATUS OF ENGAGEMENT</p> <p>The company has yet to respond to outreach from Q4 2021. As such, it is subject to the reminder and escalation process in 2022.</p>	

THEME Bribery	LOCATION Vietnam
STATUS OF ENGAGEMENT The company has yet to respond to outreach from Q4 2021. As such, it is subject to the reminder and escalation process in 2022.	

TENMA Corp.	ISIN JP3547800007
SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q4 2021
THEME Bribery	LOCATION Japan
STATUS OF ENGAGEMENT The company has yet to respond to outreach from Q4 2021. As such, it is subject to the reminder and escalation process in 2022.	

Teollisen yhteistyön rahasto Oy	ISIN FI4000068804
SDG ALIGNMENT SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q3 2021
THEME Indigenous rights, Living standards, Stakeholder consultation	LOCATION Kenya
STATUS OF ENGAGEMENT The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 28 December 2021.	

The Kansai Electric Power Co., Inc.	ISIN JP3228600007
SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q4 2021
THEME Bribery	LOCATION Japan

STATUS OF ENGAGEMENT

The company has yet to respond to outreach from Q4 2021. As such, it is subject to the reminder and escalation process in 2022.

Uber Technologies, Inc.

ISIN
US90353T1007

SDG ALIGNMENT

SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages



SDG 8: Decent Work and Economic Growth; 8.5: Achieve full and productive employment and decent work for all women and men

SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers

SDG 10: Reduced Inequalities; 10.1: Achieve and sustain income growth

QUARTER
Q3 2021

THEMES

Workplace health and safety

LOCATIONS

United States

STATUS OF ENGAGEMENT

The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 28 December 2021.

THEMES

Workplace health and safety

LOCATIONS

United Kingdom

STATUS OF ENGAGEMENT

The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 28 December 2021.

THEMES

Consumer health and safety

LOCATIONS

United States

STATUS OF ENGAGEMENT

The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 28 December 2021.

VEON Holdings BV

ISIN
US92718WAB54

SDG ALIGNMENT



SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers

QUARTER
Q4 2021

THEME

Union Rights

LOCATION

Bangladesh

STATUS OF ENGAGEMENT

The company has yet to respond to outreach from Q4 2021. As such, it is subject to the reminder and escalation process in 2022.

VEON Ltd.

ISIN
US92719A1060



SDG ALIGNMENT

SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers

QUARTER
Q4 2021

THEME

Union Rights

LOCATION

Bangladesh

STATUS OF ENGAGEMENT

The company has yet to respond to outreach from Q4 2021. As such, it is subject to the reminder and escalation process in 2022.

Victory City International Holdings Limited

ISIN
BMG9358Q1463



SDG ALIGNMENT

SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour

QUARTER
Q4 2020

THEME

Forced labour, Human rights due diligence, Modern slavery

LOCATION

China

STATUS OF ENGAGEMENT

As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.

XPO Logistics, Inc.

ISIN
US12612WAB00



SDG ALIGNMENT

SDG 8: Decent Work and Economic Growth; 8.5: Achieve full and productive employment and decent work for all women and men

SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers

SDG 10: Reduced Inequalities; 10.1: Achieve and sustain income growth

QUARTER
Q3 2021

THEME

Union Rights


LOCATION

United States




STATUS OF ENGAGEMENT

The company did not respond to outreach in Q3 2021. As such, it is subject to the reminder and escalation process and a reminder was sent to its CEO on 28 December 2021.





Youngor Group Co., Ltd.		ISIN CNE000000XR2
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour	QUARTER Q4 2020
THEMES Forced labour, Human rights due diligence, Modern slavery		LOCATIONS China
STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board of Directors, the engagement will be re-evaluated.		

ENGAGEMENTS CLOSED IN 2021


ACC Limited		ISIN INE012A01025
	<p>SDG ALIGNMENT</p> <p>SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages</p> <p>SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers</p>	<p>QUARTER Q1 2021</p>
<p>THEME Union rights, Workplace health and safety</p>		<p>LOCATION India</p>
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because, in August 2021, Holcim Ltd. (ACC Limited's parent company) stated that the number of fatalities at its operations in India continues to decrease since 2019, with zero on-site fatalities in 2020. In an investor dialogue facilitated by ISS ESG in March 2021, the company elaborated on its different measures to address health and safety concerns in India that resulted in an overall workplace fatalities reduction.</p>		
Allergan Ltd. (Ireland)		ISIN IE00BD1NQJ95
	<p>SDG ALIGNMENT</p> <p>SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages</p>	<p>QUARTER Q1 2020</p>
<p>THEME Consumer health and safety, Right to life</p>		<p>LOCATION United States</p>
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because AbbVie, Inc. confirmed to ISS ESG that effective end of 2020 it has terminated manufacturing and distribution of its subsidiary Allergan Plc's remaining branded opioid products. However, Allergan continues to face numerous lawsuits over its alleged contribution to the opioid epidemic in the United States, which has led to thousands of overdose deaths. The lawsuits allege that Allergan engaged in deceptive marketing practices in relation to its opioid products, which include funding unbranded marketing and third party advocates, touting unsubstantiated claims, and misrepresenting addiction risk, and failing to establish an effective suspicious order monitoring program.</p>		
Alphabet Inc.		ISIN US02079K1079
	<p>SDG ALIGNMENT N/A</p>	<p>QUARTER Q3 2021</p>
<p>THEME</p>		<p>LOCATION</p>


Children's rights, Consumer rights	United States
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because Alphabet, Inc.'s wholly owned subsidiary Google LLC, has implemented policy changes to be compliant with the United States Children's Online Privacy Protection Act (COPPA) Rule, and to resolve a \$170 million fine on YouTube in September 2019 by the Federal Trade Commission for COPPA violations. Thus, ISS ESG assesses that this controversy is no longer current, leading to no further need for engagement.</p>	


Ambuja Cements Limited		ISIN INE079A01024
	<p>SDG ALIGNMENT</p> <p>SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages</p> <p>SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers</p>	QUARTER Q1 2021
<p>THEME</p> <p>Union rights, Workplace health and safety</p>		LOCATION India
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because, in August 2021, Holcim Ltd. (Ambuja Cements Limited's parent company) stated that the number of fatalities at its operations in India continues to decrease since 2019, with zero on-site fatalities in 2020. In an investor dialogue facilitated by ISS ESG in March 2021, the company elaborated on its different measures to address health and safety concerns in India that resulted in an overall workplace fatalities reduction.</p>		

Andritz AG		ISIN AT0000730007
	<p>SDG ALIGNMENT</p> <p>SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands</p> <p>SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species</p>	QUARTER Q3 2015
<p>THEME</p> <p>Depletion of biodiversity, Environmental impacts</p>		LOCATION Turkey
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>ISS ESG has closed these engagements as the underlying Norm-Based Research assessments were upgraded. These changes occurred because Andritz AG is no longer involved as a bespoke supplier for the development of the 1,200 MW Ilisu dam on the Tigris river in Turkey, following the project's entry into full</p>		


operations in December 2020. Given the project's entry into full operation, ISS ESG deems the company to no longer be involved in the controversy.


Avary Holding (Shenzhen) Co., Ltd.		ISIN CNE100003GF5
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour	QUARTER Q4 2020
THEME Forced labour, Modern slavery		LOCATION China
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG has closed this engagement as the underlying Norm-Based Research (NBR) assessment was upgraded. This change occurred in part because the company shared with ISS ESG's NBR team copies of audit reports by the industry association Responsible Business Alliance which visited two facilities of Avary Holding (Shenzhen) Co., Ltd., a subsidiary of Zhen Ding Technology Holding Ltd. (ZDT), in the summer of 2020 and found no indications of forced labour. Also, in communication with ISS ESG in March 2021, ZDT denied the allegations of its participation in the labour transfers, stating that all of Avary's employees have been recruited voluntarily and compensated in compliance with relevant laws.		

Bank of Baroda		ISIN INE028A01013
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.4: Reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organized crime	QUARTER Q3 2020
THEME Money laundering		LOCATION South Africa
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded,. This change occurred because the Bank announced in February 2018 that it would exit the South African banking market after it was put under investigation by the Reserve Bank of South Africa (SARB) in a money laundering case. BoB's 2019-2020 annual report verified the company's exit strategy but did not confirm the completion of its closure of the South African branch and no new information has been reported with this regard as of June 2021.		


BASF SE		ISIN DE000BASF111
	SDG ALIGNMENT SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species	QUARTER Q4 2021

THEME Biodiversity	LOCATION Several countries
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because BASF SE has disclosed measures it has implemented to minimize the risk of use of its products and highlighted its commitment to continue to engage with stakeholders to promote bee health. Thus, ISS ESG assesses that this controversy is no longer current, leading to no further need for engagement.</p>	

FCA US LLC		ISIN US17121EAC12
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q4 2020
THEME Air pollution		LOCATION United States
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because a U.S. federal court of appeals’ filing confirmed that an association representing automakers, of which FCA US LLC is a member, has withdrawn from legal proceedings that support a rollback of U.S. fuel-efficiency standards aimed at mitigating climate change. Considering that the industry group has withdrawn from the proceedings, ISS ESG deems the company to no longer be involved in the controversy.		

Fiat Chrysler Automobiles NV		ISIN NL0010877643
	SDG ALIGNMENT SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning	QUARTER Q4 2020
THEMES Climate change regulation		LOCATION United States
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG has closed this engagement because a U.S. federal court of appeals' filing confirmed that an association representing automakers, of which Fiat Chrysler Automobiles NV is a member, has withdrawn from legal proceedings that support a rollback of U.S. fuel-efficiency standards aimed at mitigating climate change. Considering that the industry group has withdrawn from the proceedings, ISS ESG deems the company to no longer be involved in the controversy.		

Freeport-McMoRan, Inc.		ISIN US35671D8570
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	<p>SDG ALIGNMENT</p> <p>SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages</p> <p>SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers</p>	<p>QUARTER Q1 2020</p>
<p>THEME Workplace health and safety</p>		<p>LOCATION Indonesia</p>
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because no new and credible information has emerged since 2017 concerning the alleged dismissal of thousands of workers for union activity at Freeport-McMoRan, Inc.'s operations in Indonesia. As of March 2021, the company has reaffirmed that there are ongoing negotiations with local unions at its operations. Thus, ISS ESG assesses that this controversy is no longer current, leading to no further need for engagement.</p>		

G4S Plc		<p>ISIN GB00B01FLG62</p>
	<p>SDG ALIGNMENT</p> <p>SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour</p> <p>SDG 10: Reduced Inequalities; 10.7: Facilitate orderly, safe, regular and responsible migration</p>	<p>QUARTER Q1 2020</p>
<p>THEME Forced labour, Modern slavery</p>		<p>LOCATION Qatar</p>
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because G4S Plc, through its franchise G4S Qatar, has been taking significant steps to address issues claiming that it subjected migrant workers to conditions indicative of forced labour in Qatar. In May 2021, G4S outlined steps it had taken, including committing to an 'Employer Pays' principle for recruitment fees, appointing a new team of welfare and migrant worker coordinators to collect feedback from workers and carry out checks in their home and destination countries, undertaking internal audits and engaging with key stakeholders, including the local Ministry of Labour, the International Labour Organization (ILO) and UNI Global Union in Doha. Thus, ISS ESG assesses that this controversy is no longer current, leading to no further need for engagement.</p>		

Google LLC		<p>ISIN US38259PAA03</p>
	<p>SDG ALIGNMENT N/A</p>	<p>QUARTER Q2 2020</p>
<p>THEME Children's rights, Consumer privacy</p>		<p>LOCATION United States</p>

MOTIVATION FOR CLOSING ENGAGEMENT

ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because Alphabet, Inc.'s wholly owned subsidiary Google LLC, has implemented policy changes to be compliant with the United States Children's Online Privacy Protection Act (COPPA) Rule, and to resolve a \$170 million fine on YouTube in September 2019 by the Federal Trade Commission for COPPA violations. Thus, ISS ESG assesses that this controversy is no longer current, leading to no further need for engagement.

Holcim Ltd.

ISIN
CH0012214059



SDG ALIGNMENT

SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages
SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers

QUARTER
Q1 2021

THEME

Union rights, Workplace health and safety

LOCATION
India

MOTIVATION FOR CLOSING ENGAGEMENT

ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because, in August 2021, Holcim stated that the number of fatalities at its operations in India continues to decrease since 2019, with zero on-site fatalities in 2020. In an investor dialogue facilitated by ISS ESG in March 2021, the company elaborated on its different measures to address health and safety concerns in India that resulted in an overall workplace fatalities reduction.

Hyundai Motor Co., Ltd.

ISIN
KR7005380001



SDG ALIGNMENT

SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning

QUARTER
Q4 2020

THEME

Climate change regulation


LOCATION
United States


MOTIVATION FOR CLOSING ENGAGEMENT


ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because a U.S. federal court of appeals' filing confirmed that associations representing automakers, of which Hyundai Motor Co., Ltd. is a member, have withdrawn from legal proceedings that support a rollback of U.S. fuel-efficiency standards aimed at mitigating climate change. Considering that the industry groups have withdrawn from the proceedings, ISS ESG deems the company to no longer be involved in the controversy.

Indiabulls Real Estate Limited


ISIN
INE069I01010


	SDG ALIGNMENT SDG 17: Partnerships for the Goals; 17.1: Strengthen domestic resource mobilization	QUARTER Q3 2020
THEME Tax irregularities		LOCATION India
MOTIVATION FOR CLOSING ENGAGEMENT <p>ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because, no new information on Indiabulls Real Estate Limited's (IRE) tax practices has emerged since June 2019, when media reported that IRE was, in April 2019, ordered by the Indian Income Tax Settlement Commission to pay INR300 billion in additional tax and interest charges on undisclosed income. As of 31 March 2019, the matter regarding the income tax raids was awaiting a final decision by the Income Tax Settlement Commission. Thus, ISS ESG assesses that this controversy is no longer current, leading to no further need for engagement.</p>		


Isuzu Motors Ltd.		ISIN JP3137200006
	SDG ALIGNMENT SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning	QUARTER Q4 2020
THEMES Climate change regulation		LOCATIONS United States
MOTIVATION FOR CLOSING ENGAGEMENT <p>ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because a U.S. federal court of appeals' filing confirmed that an association representing automakers, of which Isuzu Motors Ltd. is a member, has withdrawn from legal proceedings that support a rollback of U.S. fuel-efficiency standards aimed at mitigating climate change. Considering that the industry group has withdrawn from the proceedings, ISS ESG deems the company to no longer be involved in the controversy.</p>		

JBS SA		ISIN USP59695AC39
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q4 2020
THEME Bribery		LOCATION Brazil
MOTIVATION FOR CLOSING ENGAGEMENT <p>ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because JBS is implementing measures to remediate allegations that it bribed public officials to obtain bank financing, food-sanitation certificates, tax incentives and investments by pension funds between 2007 and 2015. JBS has established a compliance program, appointed a global head of compliance and established ethics committees for each business unit and in 2020, the company launched</p>		


its Global Anticorruption Policy and began training cycles on specific compliance topics. Between November 2018 and August 2020, JBS conducted an independent audit which certified 97% adherence to the JBS Program on anti-corruption laws and best compliance practices based on national and international guidelines. Thus, ISS ESG assesses that this controversy is no longer current, leading to no further need for engagement.


Khon Kaen Sugar Industry Public Co. Ltd.		ISIN TH0828010007
	SDG ALIGNMENT SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q3 2020
THEME Forced displacement		LOCATION Cambodia
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This is because while media reports of claims of inadequate compensation continue against Khon Kaen Sugar Industry Public Co. Ltd.'s buyer, no such allegations continue directly against Khon Kaen.		

Kia Corp.		ISIN KR7000270009
	SDG ALIGNMENT SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning	QUARTER Q4 2020
THEME Climate change regulation		LOCATION United States
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because a U.S. federal court of appeals' filing confirmed that an association representing automakers, of which Kia Motors Corp. is a member, has withdrawn from legal proceedings that support a rollback of U.S. fuel-efficiency standards aimed at mitigating climate change. Considering that the industry group has withdrawn from the proceedings, ISS ESG deems the company to no longer be involved in the controversy.		


Kommunal Landspensjonskasse Gjensidig Forsikringsselskap		ISIN XS0250742896
	SDG ALIGNMENT SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services	QUARTER Q3 2021


<p>SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels</p>	
THEME	LOCATION
Indigenous rights, Living standards	Kenya
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because, in September 2021 Kommunal Landspensjonskasse Gjensidig Forsikringsselskap (KLP) confirmed, in investor dialogue facilitated by ISS ESG, that its 50% owned investment fund KLP Norfund Investments AS (Norfund), has completed the sale of its stake in the Lake Turkana Wind Power Ltd. (LTWP) consortium which, since 2012, has been alleged by NGOs of failing to obtain the free, prior, and informed consent (FPIC) of the Turkana, Samburu, and Rendille tribes in Kenya. KLP maintained its commitment to local engagement and support to the principle of FPIC. Thus, ISS ESG assesses that this controversy is no longer current, leading to no further need for engagement.</p>	


Korea Electric Power Corp.		ISIN KR7015760002
	SDG ALIGNMENT SDG 13: Climate Action; 13.3: Improve education, awareness-raising and human and institutional capacity on climate change	QUARTER Q3 2021
THEME Air pollution, Environnemental impacts		LOCATION South Africa
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because, in September 2021, Korea Electric Power Corp. (KEPCO) confirmed, in response to investor queries, facilitated by ISS ESG, the cancellation of the proposed 630 MW coal-fired Thabametsi power station in South Africa, whose environmental authorization was challenged by the NGO Earthlife Africa Johannesburg (ELA) on climate change grounds. Considering KEPCO's confirmation of the termination of the project, ISS ESG assesses that this controversy is no longer current, leading to no further need for engagement.		

Lu Thai Textile Co., Ltd.		ISIN CNE000000ST8
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q4 2020
THEME Union rights, Workplace health and safety		LOCATION Myanmar
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because there have been no renewed allegations of labour rights violations specific		


to the operations in Myanmar since 2018. Thus, ISS ESG assesses that this controversy is no longer current, leading to no further need for engagement.


Lu Thai Textile Co., Ltd.		ISIN CNE000000ST8
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q4 2020
THEME Gender discrimination, Workplace health and safety		LOCATION Cambodia
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because, while Lu Thai remains excluded from the Norwegian Government Pension Fund (GPF) as of March 2021, there have been no renewed allegations of labour rights violations specific to the operations in Cambodia since 2018. Thus, ISS ESG assesses that this controversy is no longer current, leading to no further need for engagement.		


Lu Thai Textile Co., Ltd.		ISIN CNE000000ST8
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour	QUARTER Q4 2020
THEME Forced labour, Human rights due diligence, Modern slavery		LOCATION China
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred in part because in August 2020 Lu Thai disclosed that it sold its subsidiary operating in Xinjiang. In a subsequent September 2020 press statement, the company confirmed that it does not have "any equity stake or related investment in Xinjiang" but failed to clarify whether it still sources cotton from the region. However, the engagements continue on the labour rights controversies in Cambodia and Myanmar.		

Mazda Motor Corp.		ISIN JP3868400007
	SDG ALIGNMENT SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning	QUARTER Q4 2020
THEME Climate change regulation		LOCATION United States
MOTIVATION FOR CLOSING ENGAGEMENT		


ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because a U.S. federal court of appeals' filing confirmed that associations representing automakers, of which Mazda Motor Corp. is a member, have withdrawn from legal proceedings that support a rollback of U.S. fuel-efficiency standards aimed at mitigating climate change. Considering that the industry groups have withdrawn from the proceedings, ISS ESG deems the company to no longer be involved in the controversy.


Mitsubishi Motors Corp.		ISIN JP3899800001
	SDG ALIGNMENT SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning	QUARTER Q4 2020
THEME Climate change regulation		LOCATION United States
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because a U.S. federal court of appeals' filing confirmed that associations representing automakers, of which Mitsubishi Motors Corp. is a member, have withdrawn from legal proceedings that support a rollback of U.S. fuel-efficiency standards aimed at mitigating climate change. Considering that the industry groups have withdrawn from the proceedings, ISS ESG deems the company to no longer be involved in the controversy.</p>		

Subaru Corp.		ISIN JP3814800003
	SDG ALIGNMENT SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning	QUARTER Q4 2020
THEMES Climate change regulation		LOCATIONS United States
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because a U.S. federal court of appeals' filing confirmed that an association representing automakers, of which Subaru Corp. is a member, has withdrawn from legal proceedings that support a rollback of U.S. fuel-efficiency standards aimed at mitigating climate change. Considering that the industry group has withdrawn from the proceedings, ISS ESG deems the company to no longer be involved in the controversy.</p>		


Suzuki Motor Corp.		ISIN JP3397200001
	SDG ALIGNMENT	QUARTER Q4 2020


SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning	
THEME Climate change regulation	LOCATION United States
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because a U.S. federal court of appeals' filing confirmed that an association representing automakers, of which Suzuki Motor Corp. is a member, has withdrawn from legal proceedings that support a rollback of U.S. fuel-efficiency standards aimed at mitigating climate change. Considering that the industry group has withdrawn from the proceedings, ISS ESG deems the company to no longer be involved in the controversy.</p>	

TH Plantations Bhd.		ISIN MYL511200007
	<p>SDG ALIGNMENT</p> <p>SDG 13: Climate Action; 13.3: Improve education, awareness-raising and human and institutional capacity on climate change</p> <p>SDG 15: Life on Land; 15.2: Sustainable management of all types of forests</p>	QUARTER Q4 2019
THEME Depletion of biodiversity, Deforestation		LOCATION Indonesia
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because TH Plantations Bhd. has been taking significant steps to address issues alleging that it cleared forests and planted on peatlands in North Kalimantan, Indonesia. In November 2020, THP published a new Sustainability Policy which includes a public No Deforestation, No Peat, No Exploitation (NDPE) commitment and since 2018, no new allegations of deforestation have arisen. Thus, ISS ESG assesses that this controversy is no longer current, leading to no further need for engagement.</p>		


Toyota Motor Corp.		ISIN JP3633400001
	<p>SDG ALIGNMENT</p> <p>SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning</p>	QUARTER Q4 2020
THEME Climate change regulation		LOCATION United States
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because a U.S. federal court of appeals' filing confirmed that associations representing automakers, of which Toyota Motor Corp. is a member, have withdrawn from legal proceedings that support a rollback of U.S. fuel-efficiency standards aimed at mitigating climate change.</p>		

Considering that the industry groups have withdrawn from the proceedings, ISS ESG deems the company to no longer be involved in the controversy.

Westpac Banking Corp.		ISIN AU000000WBC1
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.1: Reduce all forms of violence and related death rates everywhere	QUARTER Q1 2020
THEME Children's rights, Human rights due diligence, Modern slavery		LOCATION Philippines
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because, in communication with ISS ESG in August 2021, Westpac stated that it is implementing remediation and preventive measures through a Response Plan. It has paid a penalty in 2020 with the Australian Transaction Reports and Analysis Centre (AUSTRAC) and also filed a Statement of Agreed Facts and Admissions with the Federal Court of Australia outlining its remediation measures. Westpac confirmed that there are no outstanding matters associated with the AUSTRAC. ISS ESG assesses that this controversy is no longer current, leading to no further need for engagement.</p>		

Zhejiang Huayou Cobalt Co., Ltd.		ISIN CNE100001VW3
	SDG ALIGNMENT SDG 4: Education; 4.1: Ensure that all girls and boys complete free, equitable and quality primary and secondary education leading to relevant and effective learning outcomes SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour	QUARTER Q1 2021
THEME Living wage, Modern slavery, Workplace health and safety		LOCATIONS Congo (Democratic Republic)
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>ISS ESG has closed this engagement as the underlying Norm-Based Research assessment was upgraded. This change occurred because of measures the company has taken to address child labour concerns in its supply chains; these supply chain concerns had been the main such controversy. These measures include the company announcing in late 2020 that it stopped sourcing cobalt from individuals and from the Kasulo and Kamilombe mining sites – which were the main subject of stakeholder allegations – until the industry establishes criteria for responsible cobalt sourcing.</p>		

Zhen Ding Technology Holding Ltd.		ISIN KYG989221000
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	<p>SDG ALIGNMENT</p> <p>SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour</p>	<p>QUARTER</p> <p>Q4 2020</p>
<p>THEME</p> <p>Forced labour, Human rights due diligence, Modern slavery</p>		<p>LOCATION</p> <p>China</p>
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>ISS ESG has closed this engagement as the underlying Norm-Based Research (NBR) assessment was upgraded. This change occurred in part because the company shared with ISS ESG's NBR team copies of audit reports by the industry association Responsible Business Alliance which visited two facilities of Avary Holding (Shenzhen) Co., Ltd., a subsidiary of Zhen Ding Technology Holding Ltd. (ZDT), in the summer of 2020 and found no indications of forced labour. Also, in communication with ISS ESG in March 2021, ZDT denied the allegations of its participation in the labour transfers, stating that all of Avary's employees have been recruited voluntarily and compensated in compliance with relevant laws.</p>		

COMPANIES UNRESPONSIVE TO LONG-STANDING CONTROVERSIES

Separately from the engagements conducted during 2021, the following section identifies companies that continue to be involved in long-standing controversies and where progress is yet to be seen in Norm-Based Engagement initiated prior to 2021. While ISS ESG will continue to monitor the feasibility of engagement, investor clients may consider these companies and engagement topics for further due diligence.

The identification has been made by ISS ESG on the basis of companies which have – in more than one engagement cycle – been either unresponsive or where responses have been deemed poor, as the company did not address the ESG topic(s), the engagement questions posed or provide information on the management of the issue. The identification also considered where the milestones for the objectives set for Norm-Based Engagement remain at ‘no measures announced’. A further factor of consideration is the status of the controversies as well as fact-finding communication with the company conducted under Norm-Based Research.

For additional due diligence, investor clients may also want to consider companies with which engagement on specific topics has been discontinued, but where the controversy remains ongoing.

Adani Enterprises Limited			ISIN INE423A01024
ENGAGEMENT CYCLES	ENGAGEMENT STATUS	TOPIC	
Q1 2017 Q1 2019	Suspended	Alleged failure to mitigate climate change impacts and to assess environmental impact in Queensland, Australia	
ENGAGEMENT STATUS SUMMARY On behalf of clients, ISS ESG has attempted to engage with Adani Enterprises in Q1 2017 and Q1 2019, however, the company has failed to respond to ISS ESG’s investor enquiries despite repeated reminders and escalations. The engagement has been suspended since April 2020.			

CNOOC Limited			ISIN HK0883013259
ENGAGEMENT CYCLES	ENGAGEMENT STATUS	TOPIC	
Q2 2013 Q2 2016	Suspended	Alleged failure to address environmental impacts associated with oil sands project of Syncrude consortium in Alberta, Canada	
ENGAGEMENT STATUS SUMMARY In August 2013, the company provided a poor-quality response to the Q2 2013 investor enquiry, referring to its sustainability policies and CSR reports and statements which did not detail any updates on the Syncrude oil sands project. In June 2016, the company provided another poor-quality response to the Q2 2016 investor enquiry, and did not provide an update on the engagement questions posed nor provide information on the management of the oil sands project. The engagement has been suspended since January 2019.			

Hon Hai Precision Industry Co., Ltd.			ISIN US4380902019
ENGAGEMENT CYCLES	ENGAGEMENT STATUS	TOPIC	
Q1 2020 Q4 2020	Suspended	Alleged failure to respect the right to just and favourable conditions of work in China	
<p>ENGAGEMENT STATUS SUMMARY</p> <p>After escalating the Q1 2020 investor enquiry to Hon Hai's Chairman and President, ISS ESG suspended the engagement due to new developments and to launch a new engagement cycle that also includes the related allegation of forced labour in the Xinjiang Uyghur Autonomous Region, China. In September 2020, the company provided an adequate response to the Q1 2020 investor enquiry and outlined steps to address allegations, such as its establishment of an audit team, grievance channels and policies. Nevertheless, Hon Hai has failed to respond to ISS ESG's Q4 2020 investor enquiry despite repeated reminders and escalations. The engagement has been suspended since February 2022.</p>			

Tongling Nonferrous Metals Group Co., Ltd.			ISIN CNE000000529
ENGAGEMENT CYCLES	ENGAGEMENT STATUS	TOPIC	
Q4 2013 Q2 2015 Q2 2019	Suspended	Alleged failure to prevent pollution in China	
<p>ENGAGEMENT STATUS SUMMARY</p> <p>On behalf of investors, ISS ESG attempted to engage with Tongling Nonferrous Metals Group Co., Ltd. in Q4 2013 and Q2 2019, however, the company has failed to respond to ISS ESG's investor enquiries despite repeated reminders and escalations. The Q2 2019 engagement enquiry also concerned alleged failure to respect indigenous rights in Peru. The engagement has been suspended since April 2020.</p>			

Volcan Compania Minera S.A.A.			ISIN PEP648014202
ENGAGEMENT CYCLES	ENGAGEMENT STATUS	TOPIC	
Q2 2012 Q3 2014 Q2 2016 Q3 2018	Suspended	Alleged failure to prevent water pollution in Peru	

ENGAGEMENT STATUS SUMMARY

On behalf of clients, ISS ESG attempted to engage with Volcan in Q2 2012 and Q3 2014, however, the company failed to respond to ISS ESG's investor enquiries despite repeated reminders and escalations. Nevertheless, in June 2016, ISS ESG facilitated an engagement meeting with the company, on behalf of investors, and Volcan briefly described the wider context of its operations in Cerro de Pasco and invited further questions in writing. In October 2017, Volcan responded to follow-up questions and requested a postponement of dialogue until further notice due to an announcement by Glencore Plc of potentially acquiring a controlling stake in the company. Volcan suggested resuming contact in the first quarter of 2018. Volcan has since failed to respond to the Q3 2018 investor enquiry despite repeated reminders and escalations. The engagement has been suspended since September 2019.

Appendix A



ISS ESG is the responsible investment arm of Institutional Shareholder Services Inc., the world's leading provider of environmental, social, and governance solutions for asset owners, asset managers, hedge funds, and asset servicing providers. With more than 30 years of corporate governance expertise and 25 years of providing in-depth responsible investment research and analytics, ISS ESG has the unique understanding of the requirements of institutional investors. With its comprehensive offering of solutions, ISS ESG enables investors to develop and integrate responsible investing policies and practices, engage on responsible investment issues, and monitor portfolio company practices through screening solutions. It also provides climate data, analytics, and advisory services to help financial market participants understand, measure, and act on climate-related risks across all asset classes. In addition, ISS ESG delivers corporate and country ESG research and ratings enabling its clients to identify material social and environmental risks and opportunities.

NORM-BASED ENGAGEMENT

ISS ESG's Norm-Based Engagement Solution facilitates engagement with issuers on behalf of clients who would like to encourage corporate disclosure of efforts taken to manage or mitigate the environmental and social risks connected to business activities or operations. Engagement is considered with companies that have been identified through ISS ESG's Norm-Based Research offering as having failed to address reported allegations – or controversies – of adverse impacts on society and the environment in contravention of established expectations for responsible business conduct as set out in international norms such as the UN Global Compact's ten principles and the OECD Guidelines for Multinational Enterprises. The Norm-Based Research framework also takes into consideration the intersections between the Sustainable Development Goals and the private sector.

During the research phase, ISS ESG carries out extensive dialogue with companies and expert stakeholders – governmental or inter-governmental bodies, NGOs, academic organisations – to validate all facts relevant to an identified controversy. The in-depth research conducted under Norm-Based Research identifies gaps in company disclosure and approaches to addressing reported allegations. This analysis also constitutes the grounds for ascertaining if the desired level of disclosure might be achieved through investor dialogue.

Investor engagement, facilitated by ISS ESG through Norm-Based Engagement, is a continuation and escalation of the research dialogue. ISS ESG's Norm-Based Engagement approach encourages, on behalf of those investor clients participating in the Norm-Based Engagement, companies to elaborate on efforts taken to design and implement better risk management systems at the operational level, to minimize the risk for re-occurrence of failures to respect international norms and standards for responsible business conduct.

Around 100 companies are selected for Norm-Based Engagement each calendar year. Each client of the Norm-Based Engagement Solution determines at its own discretion the engagements in which it would like to participate.

DISCLAIMER

Seeyond

Registered Office: 43 Avenue Pierre Mendes France – 75013 Paris – France

Tel. +33 1 58 19 09 80

A limited company with capital of € 4 963 183

Regulated by AMF under n° GP 17000034

Company Trade Registration (RCS) Number 525 192 720 Paris

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