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1. Introduction

1.1 What is the purpose of this document?

We believe it is vital that we are transparent about our Corporate Sustainability Assessment (CSA) process, the methodology and rationale behind the questions we ask, our expectations in terms of information and data, and how the information you provide is used to calculate the Total Sustainability Score used to select constituents of the Dow Jones Sustainability Indices.

To this end, this document provides companies filling in our CSA questionnaire with information on the general questions we ask of companies in all (or many) industries. Our aim is to clarify not just the questions’ rationale and intent, but also to provide extra details on the structure of our questions, the definitions we use, and guidance on what types of answers are expected and acceptable for each question. We intend to update this document over time to reflect changes to the CSA and to cover more cross-industry questions (questions applicable to a majority but not all industries). We are also sharing the approach by which responses are assessed, what we call the “Assessment Focus.”

We also provide an overview of links between the CSA and the GRI (Global Reporting Initiative) Standards at the end of this document to help reduce the effort companies need to put in to fill in the questionnaire by better understanding where common metrics or definitions are used. Please refer to the final section of this document to view the complete table. We do not guarantee the accuracy of all references to GRI Standards, nor can we guarantee that all references in this document reflect ongoing changes to the GRI Standards framework.

It is important to remember that this document provides supplementary guidance on how to answer the questions; it should not be used on its own to fill out the questionnaire. For presentation purposes, there may be some discrepancies between this document and the online CSA questionnaire, and the questionnaire visible via the portal should always be considered the master document in terms of the Question Layout, and data or information requested. This document should be used as a complement to the online questionnaire and is in no way intended to replace it.

The CSA Companion serves as an additional source of information for companies participating in the CSA and for those that wish to understand the approach to completing the questionnaire better. The CSA companion simply serves as additional information – the illustrative examples do not serve as guarantees for a higher Total Sustainability Score or improved results in the CSA.

1.2 How should you use this document?

For each question in the CSA we provide the assessment focus, the question rationale, details of the question layout and specific guidance on how to answer.

The question-specific guidance & definitions sections define the terms we use and provide details on how to interpret and answer each question. They also specify the question’s alignment with the GRI and whether internal or public documents will be necessary to answer the question, in full or in part.

For the purpose of the CSA, the term “public references” refers to documents, reports, websites, or other online content found in the public domain. This information must be available to all stakeholders and valid at the time of the review of the CSA by us.

1.3 General Guidance

Criterion Weights

The Corporate Sustainability Assessment is a holistic assessment, but the structure and weighting of each criterion depends on its financial materiality in a given industry. To aid companies’ preparation for the CSA, we share the weights for the different aspects of the assessment under CSA Methodology in the CSA Resource Center. These weight schemes are also clearly visible on the Company Benchmarking Scorecard which all participating companies receive in September.

Answering Questions

This section provides general guidance on how to complete the Corporate Sustainability Assessment, our expectations and some general tips for a successful submission. Each question in the questionnaire consists of one or more sub-questions. You are given the possibility of selecting one or more answers to each question. Generally, the first option will enable you to answer the relevant question or sub-questions. Each question also contains a standard set of answer options that enable you to indicate if you do not have the information asked for or the question is not applicable to you.
The standard answer options provided in each:

<table>
<thead>
<tr>
<th>Answer Option</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>o No, we do not.</td>
<td>Should be used if the company does not have the requested information, policy or strategy.</td>
</tr>
<tr>
<td>o Not applicable. Please provide explanations in the comment box.</td>
<td>Should only be used if the question is not applicable to the company’s business model. Answers marked as such will be carefully reviewed and only accepted if the question is deemed irrelevant for the company’s specific business model. If a question is marked as not applicable, the weight of the question will be redistributed amongst the remaining questions in the criterion.</td>
</tr>
<tr>
<td>o Not known.</td>
<td>This answer should be marked if the company is unaware of whether or not the required information is available within their company or not.</td>
</tr>
</tbody>
</table>

Supporting Evidence

Supporting evidence is asked for in certain questions. If required, supporting evidence is used to verify the submitted answers. To support our analysts, please provide the pdf page number, not the document’s nominal page numbers. In order to make sure that the references provided are considered by us as you intended, we suggest limiting the number of references you provide, and that you focus on providing references that are clearly relevant for the answers that request one. If you would like to add references for questions that do not require one, you may do so.

References can be either public or non-public, depending on the question. Where publicly available references are required, this is clearly stated, and the reference can be added by providing a URL. As stated in the banners over “partially public” questions, where either public or non-public references can be provided, we prefer publicly available documents, as this demonstrates more transparency than information that is only internally available.

1.4 Media & Stakeholder Analysis

We perform a Media & Stakeholder Analysis (MSA) as part of its assessment methodology to check the consistency of a company’s behavior and management of crisis situations in line with its stated principles and policies. The MSA is based on an analysis of ongoing company-specific controversies related to sustainability topics. Results of the MSA range from no impact to high impact, with the latter reflecting serious reputational risks that could have consequences for the company’s bottom line (such as legal liabilities or a high probability of imminent legal liabilities). In addition, the overall quality and effectiveness of the management’s response to a situation is assessed, evaluating whether or not a company has transparently and proactively managed the issue.

The MSA process is complemented by an additional examination of media coverage, stakeholder commentaries, and other publicly available sources which are provided by RepRisk ESG Business Intelligence.

On a daily basis, RepRisk screens, captures, filters and analyzes environmental, social and governance (ESG) risks related to companies in 16 languages from a wide range of external stakeholders and third parties.

In the event that such an MSA case is identified, companies will be contacted with a request for additional information surrounding the case in question. We offer all assessed companies the possibility to provide us with their views on the ongoing case, the impact on their business and their reaction to the situation.

For more information on the MSA process, please refer to our “Measuring Intangibles” white paper available at our website.
1.5 **Assessment focus**

In the spirit of transparency, we are sharing the assessment foci of the questions contained in the Companion. With each question, we will include icons to give an indication of what we are looking for.

<table>
<thead>
<tr>
<th>Assessment Focus</th>
<th>Icons</th>
<th>Description of Information Sought</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disclosure/Transparency</td>
<td>🔊</td>
<td>Disclosure of qualitative/quantitative information</td>
</tr>
<tr>
<td>Documents</td>
<td>📄</td>
<td>Document supporting company's response</td>
</tr>
<tr>
<td>Public Documents</td>
<td>🌍</td>
<td>Publicly available document supporting company's response</td>
</tr>
<tr>
<td>Exposure/Coverage</td>
<td>📈</td>
<td>Coverage of measures implemented or data reported</td>
</tr>
<tr>
<td>Trend</td>
<td>📈</td>
<td>Trend of key indicators in the last three or four years</td>
</tr>
<tr>
<td>Performance</td>
<td>📈</td>
<td>Performance of key indicators in comparison to our expected threshold</td>
</tr>
<tr>
<td>Awareness</td>
<td>🌍</td>
<td>Awareness of internal and external issues and measures taken</td>
</tr>
<tr>
<td>External Verification</td>
<td>🌍</td>
<td>Third party verification of data or processes</td>
</tr>
</tbody>
</table>

**PLEASE NOTE:** The question texts, methodology, and assessment schemes presented may be subject to change at any time before or after March 25th 2020 at the discretion of SAM. In addition, questions might look different in the Online Assessment Tool in terms of Question Layout.

We also reserve the right to update the contents of the CSA Companion and if such updates should take place, there will be an update of the date shown on the title page of the CSA Companion.
2. Company Information

2.1 Question-Specific Guidance & Definitions:

The information asked in this question is required by us to normalize quantitative data provided in other questions and criteria (e.g., Operational Eco-Efficiency). Company data reported here may also be used to normalize other reported data in the questionnaire or may be used by us for research purposes.

- **Revenues**: Please provide the revenues in your reporting currency, and indicate which currency you have used in the comment box. Please provide constant currency (foreign exchange adjusted) revenues if possible, as they eliminate the effect of fluctuations in foreign exchange rates and are thus a better indicator of business performance. However, reported revenues are also accepted.

- **FTEs (Full Time Employee Equivalents)**: Calculation must include full-time, part-time and contracted employees.

2.2 Data Requirements

- Please provide information for all parts of this question and ensure that the figures provided are consistent over four years as well as consistent with the figures (e.g., emissions) provided in the other questions.

- Reporting currency: currency selected will be used throughout the questionnaire for consistency purposes, and will automatically be selected for questions asking for monetary data.

- Unless otherwise specified, all monetary values should be reported in their absolute values.

- If available for your industry, please select the appropriate normalization factor to be used for normalizing data reported in "Operational Eco-Efficiency".
3. Economic Dimension

3.1 Corporate Governance

Corporate governance systems ensure that a company is managed in the interests of shareholders (including minority shareholders). On the one hand this includes checks and balances that enable the Board of Directors to have appropriate control and oversight responsibilities. Empirical evidence suggests that over a period of 5 years, the difference in return on equity between well-governed and badly-governed companies can be as much as 56% (source: GMI 2007). On the other hand, management incentives have to be set in such a way that management interests are aligned with shareholders' interests.

Our questions focus on board structure, composition of the board and related committees, board effectiveness and measures to ensure alignment with shareholders' long-term interests, which include transparency and the structure of executive remuneration as well as share ownership requirements.

We ask that most information reported is publicly available and verifiable. Provided information should always be as up-to-date as possible, reflecting the current governance structure and processes of the company. For questions marked as requiring public information, information not verifiable in the public domain will not be accepted.

3.1.1 Board Structure

Public: this question requires publicly available information.

Assessment Focus

Question Rationale

An effective board of directors, properly constituted, is the linchpin of good corporate governance. Boards are responsible for managerial performance, meeting the corporation's stated objectives, compliance with applicable laws and regulations, and protecting shareholder rights and interests. To assess the quality of a board's structure, we focus on its composition, its proportion of independent members, and its overall size, as empirical studies show that oversized boards are counter-productive to firm performance. We also assess to what extent companies have made explicit statements about their definitions of, and requirements with respect to the independence of board members.

Question Layout

Please indicate the number of executive and non-executive directors on the board of directors/ supervisory board of your company. In addition, please indicate if your company has an independence statement for its board of directors in place.

Board type

Please select if your company has a one-tier or two-tier board:

- **One-tier system** (companies with a board of directors)

  

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

- **Two-tier system** (companies with a supervisory board)

  

<table>
<thead>
<tr>
<th>Number of members</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supervisory board</td>
</tr>
<tr>
<td>Independent directors</td>
</tr>
<tr>
<td>Other non-executive directors</td>
</tr>
<tr>
<td>Employee representatives (if not applicable, please leave the field empty)</td>
</tr>
<tr>
<td>Management board/executive management</td>
</tr>
<tr>
<td>Senior executives</td>
</tr>
<tr>
<td>Total size of both boards</td>
</tr>
</tbody>
</table>

Question Layout (continued)
Board Independence Statement

Please indicate if your company has an independence statement for the board of directors in place. Please provide a supporting public reference:

- Yes, we have a publicly available independence statement. Please indicate below what the statement includes and provide a public reference:
  - An explicit definition of what determines that a board member is independent. Please specify:
  - A target share of independent directors on the board. Please specify:
- We do not have a public independence statement for the board of directors

Question-Specific Guidance & Definitions

Types of Boards: Companies can choose between one- and two-tier systems when answering the question. The descriptions below will help you identify which of these structures your company has in place.

One-tier systems have a single board consisting of executive, non-executive and independent directors. It is possible that such boards only consist of independent directors or a combination of executive and independent directors. Most countries use a one-tier system.

Two-tier systems have an executive board and a supervisory board, which is composed of non-executive or independent members and – in certain countries – employee representatives. Countries that commonly use two-tier systems include Austria, Denmark, Finland, France, Germany, Hungary, Norway, and The Netherlands. Sweden is an exception and should be classified as one-tier despite the presence of employee representatives on the board, employee representatives on such boards should be counted as non-executives.

Types of Directors: We outline definitions of possible types of directors below. These definitions should be used to classify board members.

Executive directors are employees, and are usually senior managers of the company. Executive directors are employees of the company, and are in an executive function (e.g. CEO, CFO, etc.).

Independent directors are non-executive directors that are independent by meeting at least 4 of the 9 criteria listed (of which at least 2 of the first 3 criteria) listed below:
1. The director must not have been employed by the company in an executive capacity within the last five years.
2. The director must not accept or have a “Family Member who accepts any payments from the company or any parent or subsidiary of the company in excess of $60,000 during the current fiscal year or any of the past three fiscal years”, other than those permitted by SEC Rule 4200 Definitions.
3. The director must not be a “Family Member of an individual who is, or during the past three years was employed by the company or by any parent or subsidiary of the company as an executive officer.”
4. The director must not be (and must not be affiliated with a company that is) an adviser or consultant to the company or a member of the company’s senior management.
5. The director must not be affiliated with a significant customer or supplier of the company.
6. The director must have no personal services contract(s) with the company or a member of the company’s senior management.
7. The director must not be affiliated with a not-for-profit entity that receives significant contributions from the company.
8. The director must not have been a partner or employee of the company’s outside auditor during the past three years.
9. The director must not have any other conflict of interest that the board itself determines to mean they cannot be considered independent.

Other non-executive directors are directors that are not executives but also do not qualify as independent as defined above. They are all other members of the board not already accounted in the executive and independent categories. They might be employed by the organization.

Data requirements:
- The type of board, the breakdown between the different types of directors, and the total board size must be filled out.
- If the definition of independence at the company differs from our definition given above, please adjust the number of independent directors in line with our definition and provide a comment in the comment box.
- In the question part “Board Independence Statement”, we also expect the statement to meet at least 4 out of 9 criteria of which at least 2 of the first 3 have to be met. If this is not the case, then please indicate so.
- In the question part “Board Independence Statement” we do allow you to refer to an established national or stock exchange Corporate Governance Code as long as this also meets our definition of independence.
- All data in this question is expected to be publicly available. However, we will double check your comments to see if the definition of independence differs from ours.

Public disclosure requirements:
- Board structure (it must be determinable whether board members are executive directors, employee representatives, non-executive directors or independent directors)
- Publicly available independence statement
- Public reporting on the definition of independence used (i.e. if it is in-line with local or international standards corresponding to the definition used by us)
- Public reporting on the target share of independent directors on the board

References
GRI Standards 102-22 & 405-1 are relevant for this question.
3.1.2 Non-Executive Chairman/Lead Director

Public: this question requires publicly available information.

Assessment Focus

Question Rationale
International consensus favors the separation of the roles of chairman and CEO. If the board of directors opts to appoint one person fulfilling both roles, it has to build in the necessary checks and balances to avoid a potential abuse of power. Companies headed by a joint chairman/CEO are expected to explain their reasons for this structure, have appointed a “lead independent director,” and should provide a statement about the lead director’s responsibilities.

Question Layout
Is the board of directors or the supervisory board headed by a non-executive and independent chairman and/or an independent lead director? [Choose the option that best reflects the company’s governance structure]

- Chairman is non-executive and independent. Please specify for how many years this approach has been adopted
- Role of CEO and chairman is split and former CEO/chairman (presently in a non-executive position) is now chairman
- Role of CEO and chairman is split and chairman is non-executive but not independent
- Role of CEO and chairman is split and former CEO/chairman is now chairman, but independent lead director is appointed. Please indicate the name of the lead director
- Role of chairman and CEO is joint, but independent lead director is appointed.
  Please indicate the name of the lead director
- Role of chairman and CEO is joint or chairman is an executive director

Question-Specific Guidance & Definitions

If the company has an independent chairman, the number of calendar years this approach has been in place should be indicated in the box following the first statement.

The independent lead director role exists to provide leadership to the board in those instances in which the joint roles of Chairman and CEO could potentially be in conflict. Fundamentally, the role exists to ensure that the board operates independently of management and that directors have independent leadership at the board level. If the company has chosen either of the two options indicating that it has an independent lead director, the name of this director should be provided in the comment box.

Independent directors are non-executive directors that are independent by meeting at least 4 of the 8 criteria listed (of which at least 2 of the first 3 criteria) listed below:

1. The director must not have been employed by the company in an executive capacity within the last five years.
2. The director must not accept or have a “Family Member” who accepts any payments from the company or any parent or subsidiary of the company in excess of $60,000 during the current fiscal year or any of the past three fiscal years”, other than those permitted by SEC Rule 4200 Definitions.
3. The director must not be a “Family Member” of an individual who is, or during the past three years was employed by the company or by any parent or subsidiary of the company as an executive officer.
4. The director must not be (and must not be affiliated with a company that is) an adviser or consultant to the company or a member of the company’s senior management.
5. The director must not be affiliated with a significant customer or supplier of the company.
6. The director must have no personal services contract(s) with the company or a member of the company’s senior management.
7. The director must not be affiliated with a not-for-profit entity that receives significant contributions from the company.
8. The director must not have been a partner or employee of the company’s outside auditor during the past three years.
9. The director must not have any other conflict of interest that the board itself determines to mean they cannot be considered independent.
3.1.3 Diversity Policy

Public: this question requires publicly available information.

Assessment Focus

Question Rationale

Corporate boards are tasked with monitoring companies’ management teams on behalf of those companies' shareholders and other stakeholders. Boards are the direct representatives of these stakeholders and form one of the most important components of corporate governance. It is therefore important that the board members selected have the right experience and skills, are sufficiently independent, and act in the best interests of all stakeholders.

Diversity adds value to the board, through differences in perspective and experience. Diverse boards will be able to assess problems from a broader point of view and are more likely to take into account the best interests of all stakeholders.

Question Layout

Does your company have a formal, publicly available board diversity policy that clearly requires diversity factors such as gender, race, ethnicity, country of origin, nationality or cultural background in the board nomination process? Please indicate where this information is available in your public reporting or corporate website.

- Yes, our policy is publicly available and specifically includes the following:
  - Gender
  - Race or Ethnicity
  - Nationality, country of origin or cultural background

- No, we do not have a publicly available diversity policy.

Question-Specific Guidance & Definitions

Local corporate governance codes: Certain local corporate governance codes include guidance on diversity criteria. This can be accepted in this question if both of the following criteria apply:

- The company publicly states in its annual report that it adheres with the local corporate governance code without exception OR clearly states what those exceptions are and that they do not include the diversity factors specifically ticked in the question, and
- The local corporate governance code clearly indicates that the specific criteria ticked in the response are considered for the board nomination process.

References

GRI Standards 102-24 & 405-1 are relevant for this question.
3.1.4 Gender Diversity

Public: this question requires publicly available information.

Assessment Focus

Question Rationale

We assess whether the board reflects the diversity of the workforce and marketplace, thereby ensuring that a variety of viewpoints are heard and factored into corporate decision-making. A commitment to diversity at all levels can help companies attract employees, create goodwill with consumers, and compete better in the diverse global marketplace, which in turn benefits long-term shareholder value. Gender diversity has been an important topic of discussion in recent years, and various academic studies have shown a positive correlation between gender diversity and corporate performance, for example in terms of corporate governance (Adams and Ferreira, 2009) and innovation (Deszö and Ross, 2012).

Question Layout

Please indicate the number of women on your company’s board of directors/supervisory board and specify where this information is available in your public reporting or corporate website. If your company has a one-tier board structure, this figure includes: female executive directors, non-executive directors and independent directors. If your company has a two-tier board structure, this figure ONLY includes female independent directors and non-executive directors (this means that senior executives and employee representatives should not be included).

Question-Specific Guidance & Definitions

Employee representatives and senior executives should not be included in the total number of women on two-tier boards as they are not considered in the calculation of the total size of the supervisory board.

Employee representatives should be included in the total number of women on the board for one-tier boards containing employee representatives (e.g., for Swedish companies). If there are no women on the board of directors or supervisory board, you should write 0 in the answer to this question.

References

The study "Corporate Governance, Board Diversity, and Firm Value" (October 2001) examined Fortune 1000 firms and found a significant positive relationship between the fraction of women or minorities on the board and firm value.

GRI Standards 102-4 & 102-22 & 405-1 are relevant for this question.
3.1.5 Board Effectiveness

Public: this question requires publicly available information.

Assessment Focus

Question Rationale

An effective board of directors is vital for good corporate governance. Several studies have found that companies with specific procedures and practices designed to ensure the accountability of their board and a close alignment with shareholders’ interests perform better than those that do not. We use the parameters in this question as a proxy for the overall effectiveness of the board. In addition to meeting attendance, the number of external directorships board members hold, and performance assessment, we ask for information on how board members are elected, as the frequency of election and structure of the process can affect the accountability of board members. When board members are elected individually and on an annual basis, shareholders are able to vote them off if they are concerned with their performance. If shareholders can frequently express their confidence in or concerns about board members, the board as a whole becomes more accountable.

Question Layout

How does your company ensure the effectiveness of your board of directors/supervisory board and its alignment with the (long-term) interests of shareholders? [all sections are multiple choice]?

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

Question-Specific Guidance & Definitions

This question only applies to board members who represent shareholders (or multiple stakeholders including shareholders).

The meeting attendance section refers to two measures: first, the actual average attendance rate over the past year, and second, if there are any corporate guidelines in place with respect to meeting attendance, i.e. if there is a minimum proportion of board meetings that each board member is required to attend. Both rates should be calculated based on the total number of board meetings held in a year.

Other mandates refers to the number of other external directorships in publicly listed companies held by members of the board of directors/supervisory board (examples include executive board positions such as CEO, or member of the board of directors at another company). Board memberships in private limited companies, educational institutes (schools, colleges or universities) and not-for-profit organizations are not considered in our definition of other mandates. Only the number of mandates of independent and non-executive directors should be considered, not the mandates of executive directors or employee representatives. In this section the actual number of directors with four or fewer other mandates is considered together with any corporate guidelines on restrictions on the number of other mandates.

We consider two types of board performance assessments: (1) self-assessments of the board’s performance, meaning that the board members themselves
are allowed to systematically evaluate their performance; and (2) independent assessments of the board’s performance, meaning that an independent third party evaluates the performance of the board. Such assessments are considered regular if the company clearly shows that there are guidelines to perform them at set intervals (such as annually or every second year). Assessments are also considered regular if the company is carrying them out for the first time but with the explicit intention of conducting them regularly. It is considered best practice to carry out both types of assessments on a regular basis, although not necessarily annually.

Annual election of board members refers to a procedure whereby each board member has to be re-elected at each annual general meeting for shareholders (as opposed to when a member is elected for multiple years).

Individual election of board members refers to a procedure whereby each member is elected on an individual basis (as opposed to members being elected by slate).

References

- Corporate Accountability Report “Does Corporate Governance Matter to Investment Returns?” by Jay W. Eisenhofer, Gregg S. Leving, ISSN 1542-9563
- McKinsey Strategy & Corporate Finance “Toward a Value-Creating Board” by Conor Kehoe, Frithjof Lund, and Nina Spielmann
3.1.6 Average Tenure

Public: this question requires publicly available information.

Assessment Focus

Question Rationale

Corporate boards are tasked with monitoring companies’ management teams on behalf of those companies’ shareholders and other stakeholders. Boards are the direct representatives of these stakeholders and form one of the most important components of corporate governance. It is therefore important that the board members selected have the right experience and skills, are sufficiently independent, and act in the best interests of all stakeholders. Board tenure reflects retention and continuity on one hand, and refreshment of skills and perspectives, and independence on the other.

Research strongly supports the assertion that optimal board tenure is in the 7 to 12-year range, and that firm value declines as average tenure deviates therefrom.

Question Layout

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

- Average tenure of board members in years: ________

Question Specific Guidance & Definitions

Tenure: the number of years a member has served on the board of directors.

For two-tier boards: Employee representatives and senior executives should not be included in the calculation for two-tier boards, as they are not considered in the calculation of the total size of the supervisory board.

For one-tier boards: All board members should be reported, including executive, independent and non-executive members.

Public disclosure requirements: Average board tenure and/or individual tenure of each member of the board of directors.

References:
3.1.7 Board Industry Experience

Public: this question requires publicly available information.

Assessment Focus

Question Rationale

Corporate boards are tasked with monitoring companies’ management teams on behalf of those companies’ shareholders and other stakeholders. Boards are the direct representatives of these stakeholders and form one of the most important components of corporate governance. It is therefore important that the board members selected have the right experience and skills, are sufficiently independent, and act in the best interests of all stakeholders. This question focuses on industry and audit experience, two of the most important skill sets for setting strategy and effectively monitoring and evaluating management’s performance.

Question Layout

Please indicate the number of board members with relevant work experience in your company’s sector according to GICS Level 1 sector classification (excluding executive members and employee representatives) and list the directors’ names. Please indicate where this information is available in your public reporting or corporate website.

Number of independent or non-executive members with industry experience (e.g. excludes executives):

Please list the independent or non-executive directors included in the above count:

Question Specific Guidance & Definitions

Board Industry Experience: The member must have practical work experience in the industry (based on GICS 1 classification below). This experience can be acquired either by way of functions in management, academia, consulting or research. “Practical work experience” in the industry refers to experience attained in employee or executive roles. Having been on another company’s board in the same industry does not qualify as relevant experience.

GICS Level 1 sectors:
• Energy
• Materials
• Industrials
• Consumer Discretionary
• Consumer Staples
• Healthcare
• Financials
• Information Technology
• Communication Services
• Utilities
• Real Estate

Executives and Employee Representatives: Board members who are executives or elected as employee representatives are not included.

Public disclosure requirements: Number of independent or non-executive members of the board of directors with industry experience and/or public disclosure of the industry experience of each individual board member.
3.1.8 Executive Compensation – Success Metrics

Public: This question requires publicly available information.

Assessment Focus

Question Rationale

Use of financial metrics to evaluate management performance have become ubiquitous as the benefits of aligning incentives with company performance have been established. Our research shows that use of revenue, operating profit, and EPS are common practice. Differentiation is now only observed in a few aspects, including use of return metrics (capital efficiency) and relative metrics which compare the company to peers. In this question, we aim to find out which corporate performance indicators are used to determine CEO variable compensation. Please include only metrics applied to the CEO.

Question Layout

Does your company have predefined financial returns and/or relative financial metrics relevant for Chief Executive Officer’s variable compensation? Please indicate where this information is available in your public reporting or corporate website.

- Yes, our company has pre-defined financial returns and/or relative financial metrics relevant for Chief Executive Officer’s variable compensation? Please provide supporting evidence.

Reference link

- Financial Returns (e.g. return on assets, return on equity, return on invested capital, etc.). Please list all metrics used for this category:

- Relative Financial Metrics (e.g. comparison to peers using metrics such as total shareholder return, Tobin’s Q, growth, etc.). Please list all metrics used for this category:

Question-Specific Guidance & Definitions

Success metrics for variable CEO compensation: part of this question, any corporate performance indicators that are used to determine the CEO’s variable compensation should be indicated. Please only include metrics that apply to the CEO’s compensation, not metrics that are selectively used for other senior executives or specialist senior managers at a lower level (such as CFO or COO).

Data requirements

Please only include metrics that apply to the CEO’s compensation, not metrics that are selectively used for other senior executives or specialist senior managers at a lower level (such as CFO or COO).

References:

GRI Standard 102-35 is relevant for this question.
3.1.9 Executive Compensation – Alignment with Long-Term Performance

Public: This question requires publicly available information.

Assessment Focus

Question Rationale

Both financial and non-financial metrics are becoming increasingly important in determining variable compensation for executive management and more specifically the CEO. In this question, we assess time vesting and performance periods that are used for determining the CEO’s variable compensation. A longer vesting period ensures that the interests of management and the long-term interest of shareholders are better aligned. Additionally, we assess if the short-term bonus is deferred in shares.

Economic alignment of management with the long term performance of the company is an essential component of executive compensation. This alignment can be achieved in several ways, including deferral of short term compensation, time vesting and long term performance periods. Alignment with long term performance is particularly important during periods of short CEO tenure, as the risk of short-termism increases. For example, in 2009, CEO’s of S&P 500 companies held their position for an average of just 7.2 yrs. This has subsequently increased to 10.8 years in 2015 as the economy recovered and turnover declined, but the risk of a reversion remains. (Matteo Tonello, The Conference Board, Inc., 2016). A longer vesting period ensures that the interests of management and the long-term interest of shareholders are better aligned.

Question Layout

Does your company have the following compensation structures in place to align with long-term performance? Please indicate where this information is available in your public reporting or corporate website.

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

Deferral of Bonus for Short-term CEO Compensation
Is a portion of the CEO’s short-term incentive deferred in the form shares?

- Please indicate the percentage of the short-term bonus deferred in in the form of shares: __________ %

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

- Please indicate the longest performance period covered by your executive compensation plan: __________ years.

- We have a clawback provision in place. Please specify: __________

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

Question-Specific Guidance & Definitions

Deferred shares: refer to the percentage of the short-term bonus paid out in deferred shares instead of cash. The company can choose to pay-out the annual short-term bonus in deferred shares to the CEO and other executive directors which is seen as a best practice.

Example: “The actual number of shares that may become earned and payable under the awards will generally range from 0% to 200% of the target number of units based on achievement of the specified goals over a two-year period.”

A clawback provision is a policy that allows a company to recover performance-based compensation for some period of time after compensation awards are granted. Clawback provisions may apply to short and/or long term awards. The circumstances and conduct that would trigger clawback provisions include, but are not limited to, restatement of financial results, errors in financial information reported, misconduct by the employee directly, or misconduct by any other employee that results in incorrect financial reporting.
**Time vesting** refers to time-based pay-out structures of variable compensation for the current period x over the coming years (x+1, x+2, x+3, etc.). The amount of future pay-out is independent of the coming year’s performance. If all long-term incentives are based on future performance, the same figure should be given for the longest performance period and the longest time vesting period.

We accept the total number: the sum of the vesting period and the required holding period.

**Data Requirements**

In this question, we assess the time vesting and performance periods as well as whether the company has a clawback provision in place. In addition, we assess if the short-term bonus is deferred in shares.

The question applies to CEO compensation only.

**References**

GRI Standard 102-35 is relevant for this question.
3.1.10 Management Ownership

**Assessment Focus**

**Question Rationale**

As corporate governance systems aim to ensure that a company is managed in the interests of its shareholders, in this question we assess whether the company's CEO and other executives have stock ownership. Academic research suggests that stock ownership by senior management is positively correlated to financial performance.

**Question Layout**

Do your company's CEO and other executive committee members hold company shares? Please note that the shares included in the calculation should not be hedged or the personal financial risk of holding the shares otherwise removed. Please also indicate where this information is available in your public reporting or corporate website.

- Yes, company CEO and other executive officers hold company shares:

<table>
<thead>
<tr>
<th>Position</th>
<th>Name(s)</th>
<th>Multiple of base salary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chief Executive Officer</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average across other executive committee members owning shares</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Question-Specific Guidance & Definitions**

**Economic interest in shares held**: the shares included in the calculation should not be hedged or the personal financial risk of holding the shares otherwise removed.

**Data Requirements**

The question assesses if the CEO and/or other executive managers have stock ownership of the company.

**Public disclosure requirements**: Shareholdings of the Chief Executive Officer and at least two other executive officers.

**References**

Academic research (e.g., Bhagat and Bolton 2008) shows that stock ownership of senior management is positively related to future operating profit. Other research includes:

- Core & Larcker (2000). Performances consequences of mandatory increases in executive stock ownership.
3.1.11 Management Ownership Requirements

**Public: this question requires publicly available information**

**Assessment Focus**

**Question Rationale**

As corporate governance systems aim to ensure that a company is managed in the interests of its shareholders, in this question we assess whether there are stock ownership guidelines in place for the company’s CEO and other executives.

Academic research (e.g., Bhagat and Bolton 2008) suggests that stock ownership by senior management is positively correlated to future operating profit.

**Question Layout**

Does your company have specific stock ownership requirements for the CEO and other members of your executive committee? Please indicate where this information is available in your public reporting or corporate website.

- Yes, there are specific requirements in place. Please indicate at which levels this exist and indicate the share ownership requirements as a multiple of the annual base salary.

  
  Reference Link

- The CEO has to build up a share ownership of ______ times the annual base salary.

- Other members of the executive committee besides the CEO have to build up a share ownership of ______ times the annual base salary.

**Data Requirements**

The question assesses if there are explicit requirements indicating that the CEO and/or other executive managers are required to build up share ownership equivalent to a specific multiple of their annual base salary.

- Public disclosure requirements Share ownership requirements for the Chief Executive Officer and for all other company executives.

Academic research (e.g., Bhagat and Bolton 2008) shows that stock ownership of senior management is positively related to future operating profit. Others:

- Core & Larcker (2000), Performances consequences of mandatory increases in executive stock ownership.
- Gugler, Mueller, & Yurtoglu (2008), The Effects of Ownership Concentration and Identity on Investment Performance: An International Comparison

**References**
3.1.12 Government Ownership

**Public**: This question requires publicly available information.

**Assessment Focus**

Question Rationale
As corporate governance systems aim to ensure that a company is managed in the interests of its shareholders, in this question we assess if a government has voting rights of more than 5% and has golden shares at the company.

Academic research (e.g. Goldin et al., 2008 or Chen et al., 2017) suggests that companies without government ownership perform better than companies with government ownership.

Question Layout
Please indicate whether individual governmental institutions own a total of 5% or more of the voting rights of your company and if Yes, whether golden shares exist for them. Government ownership of 5% or less of the voting rights need to be reported. Please also indicate where this information is available in your public reporting or corporate website.

Reference link________

Government Ownership
Do governmental institutions own a total of 5% or more of the voting rights of your company?
- Yes, individual governmental institutions have more than 5% of the voting rights.

Please provide the total percentage of government ownership (sum of % of individual governmental institutions owning more than 5% of voting rights):_______ %

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

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

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

**Question-Specific Guidance & Definitions**

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

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

**Data Requirements**

Total % of government voting rights and government golden shares.

Public disclosure requirements:
- Total percentage of government ownership (sum of % of individual governmental institutions owning more than 5% of voting rights) or disclosure of all individual governmental institutions owning more than 5% of voting rights.
- Golden shares for governmental institutions (only if the corresponding option is marked).

**References**

- Chen, Ghoul, Guedhami, & Wang (2017), Do state and foreign ownership affect investment efficiency?
- Evidence from privatizations.
3.1.13 Family Ownership

Public: This question requires publicly available information.

Assessment Focus

Question Rationale

As corporate governance systems aim to ensure that a company is managed in the interests of its shareholders, in this question we assess if one or several individuals of the (founder) families are ultimate owners and have at least 5% of the voting rights.

Academic research (e.g., Eugster & Isakov, 2016 or Corstjens, Peyer & Van der Heyden, 2006) suggests that family ownership is positively correlated to future operating profit.

Question Layout

Please indicate whether (found) family members, personally or through other companies or organizations, individually have more than 5% of the voting rights of your company. Please also indicate where this information is available in your public reporting or corporate website.

○ Yes, (found) family members individually own more than 5% of the voting rights.
Total % of voting rights of the company: _______%

Reference link: _______

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

Data requirements

Total % of voting rights of (found) family members, personally or through companies/organizations.

References

• Credit Suisse (2017), The CS Family 1000
• Eugster & Isakov (2016), Founding family ownership, stock market performance and agency problems.
3.1.14 Dual Class Shares

Public: This question requires publicly available information.

Assessment Focus

Question Rationale

The traditional one-share, one-vote system has been designed to give equal treatment to all shareholders. Capital providers should get a say in how a company is run. Voting is an important tool to secure good corporate governance and ensures that asset owners are able to make the board accountable and ensure long-term value creation. In contrast, dual class shares give more voting rights to people or organizations that provided less capital to the company.

It is therefore important that all shareholders have equal voting rights in order to ensure long-term thinking and hold the board of directors accountable on their decisions.

Question Layout

Please indicate the amount of shares your company has per voting category and where this information is available in your public reporting or corporate website. For additional information, please see the information button.

Reference link: 

<table>
<thead>
<tr>
<th>Voting rights per 1 share</th>
<th>Votes per share</th>
<th>Amount of Shares</th>
<th>Voting Power (=Votes per share x Amount of Share)</th>
</tr>
</thead>
<tbody>
<tr>
<td>No vote (excluding preferred and treasury shares with no voting rights)</td>
<td>0</td>
<td>-</td>
<td>0</td>
</tr>
<tr>
<td>One vote</td>
<td>1</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Other, please specify the number of votes per share:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other, please specify the number of votes per share:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Question-Specific Guidance & Definitions

Shares: in this question, we are specifically referring to shares outstanding.

Dual-class stock: is the issuing of various types of shares by a single company. A dual-class stock structure can consist of stocks such as Class A and Class B shares, and where the different classes have distinct voting rights and dividend payments. Two share classes are typically issued: one share class is offered to the general public, and the other is offered to company founders, executives and family. The class offered to the general public has limited voting rights, while the class available to founders and executives has more voting power and often provides a majority control of the company.” (Retrieved from: http://www.investopedia.com/terms/d/dualclasstock.asp

Preferred shares: a type of stock which differs from common shares, most often because it is a hybrid instrument with features of equity and debt. Preferred shares usually do not have voting rights, but owed to this hybrid structure.

No vote: Common shares with no voting rights. Excludes preferred shares and treasury shares with no voting rights.

Data Requirements

Public disclosure requirements: Amount of shares per voting category (e.g. amount of single voting shares, dual class shares, preferred shares...) or voting power corresponding to each selected voting category (votes per share x amount of share).

No vote: Preferred shares and treasury shares with no voting rights should not be included under the "no vote shares".

References

• The International Corporate Governance Network (ICGN), Global Governance Principles 2017
3.1.15 Disclosure of Median or Mean Compensation of All Employees & CEO Compensation

**Assessment Focus**

**Question Rationale**

In the aftermath of the global financial crisis, many countries implemented or are planning to implement reforms regarding the transparency of executive compensation. Transparency is vital to restore trust among shareholders, employees, customers and other stakeholders, and hence to improve corporate reputations. Companies that are taking a proactive approach to align their reporting with this global trend and improve disclosure about executive compensation will be in a better position to fend off criticism than those that are not. In addition to complying with new regulations, transparent reporting on CEO compensation and the mean or median compensation of other employees provides a basis for understanding the "pay gap" and addresses concerns from investors and stakeholders about whether or not executive compensation is justified.

**Question Layout**

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

<table>
<thead>
<tr>
<th>CEO Compensation</th>
<th>Total CEO Compensation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Please indicate the total annual compensation of the Chief Executive Officer (or any equivalent position):</td>
<td></td>
</tr>
<tr>
<td>Total compensation includes fixed and variable compensation as well as all other parts of compensation which are required to be included in total remuneration reporting according to national accounting standards</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Employee Compensation</th>
<th>Median Employee Compensation</th>
<th>Mean Employee Compensation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Please indicate either median or mean annual compensation of all employees, except the Chief Executive Officer (or any equivalent position):</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The ratio between the total annual compensation of the chief Executive Officer and the mean or median employee compensation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>CEO compensation divided by the mean or median employee compensation</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Please specify the currency used in the table:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Question-Specific Guidance & Definitions**

**Salary** is defined here as the total annual compensation including all bonuses but excluding pension benefits and fringe benefits.

**Total annual compensation** is defined here as the total compensation including all bonuses but excluding pension and fringe benefits.

The median of the total annual compensation of all employees is defined according to the general mathematical definition of median: the median of a sequence is the middle number when sorting all numbers from low to high. This is different to the mean of the total annual compensation of all employees as the mean of a sequence of numbers is calculated by adding up all the numbers in a sequence and dividing this total by the number of entries in the sequence. In this question either the median or the mean may be provided; it is not necessary to provide both.

The ratio should be calculated as the Total CEO Compensation divided by the Median OR Mean employee compensation (i.e. the reported figure should be the multiple of the employee compensation).
Data Requirements

For this question, we encourage you to provide evidence that is publicly available and may grant additional credit for publicly available evidence.

Disclosure requirements for partially public question:
Additional credit will be granted for relevant publicly available evidence covering one of the following aspects of this question:

- Annual compensation of Chief Executive Officer and median (mean) annual compensation of all employees except the Chief Executive Officer (or any equivalent position)
- Ratio between the total annual compensation of the Chief Executive Officer and the median (mean) employee compensation

References


GRI Standard 102-38 is relevant for this question.
3.2 Materiality

This criterion aims to assess the company’s ability to identify the sources of long-term value creation, understand the link between long-term issues and the business case, develop long-term metrics and transparently report these publicly. We want to know the disclosure of material priorities, the links with the business case, and what targets are set to address these issues. These may be economic, social, or economic in nature. Most importantly, they should be the key sources that drive and create value for the business.

3.2.1 Material Issues

Assessment Focus

Question Rationale

Leading companies are increasingly focusing on the most material topics that drive their long-term value creation. These issues can cover economic, environmental and social issues, and they are key drivers for a company’s long-term business performance. The first question of this criteria assesses whether companies have conducted a materiality analysis of the most important issues driving long-term value creation and whether they are able to convincingly link these issues to their business performance.

Companies are asked to make a business case and therefore should focus on those economic, environmental, or social issues that are most important or impactful for the business performance of the company.

Question Layout

Has your company conducted a materiality analysis to identify the most important material issues (economic, environmental, or social) for your company’s performance? Please provide the three most material issues that have the greatest impact on your business and the generation of long-term value. Please indicate how these issues impact your business and serve as sources of long-term value creation for your company. Yes, our company has conducted a materiality analysis to identify key issues for long-term value creation.

<table>
<thead>
<tr>
<th>Material Issue</th>
<th>Material Issue 1</th>
<th>Material Issue 2</th>
<th>Material Issue 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Please specify your material issue:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Business Case</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Please provide a brief rationale for why this issue is material to your business.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Business Impact</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Please select the type of impact this material issue has on your business (cost/revenue/risk):</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Business Strategies</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Please specify your primary business strategies, initiatives or products that address this issue.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Long-Term Target/Metric</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you have a long-term target or metric to measure your progress on this issue in a systemic way? Please specify this target or metric if available:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Target Year</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Please specify the year for the long-term target:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Executive Compensation</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is this metric or target used to determine the compensation of executive committee member(s)? If yes, please specify how this metric is used.</td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>
Question-Specific Guidance & Definitions

Material Issue: A material issue is a sustainability factor that can have a present or future impact on the company’s value drivers, competitive position, and therefore on long-term shareholder value creation.

Materiality Assessment: A materiality assessment is an approach to identify critical economic, environmental and social issues which have a significant impact on the company's business performance.

Materiality Assessment Frequency: We expect companies to conduct a materiality assessment at least every 5 years and to report the results in at least one of the two most recent Annual or Sustainability reports.

We expect companies to have conducted a materiality analysis and identified the three most material economic, environmental or social issues driving long-term value creation which should be clearly defined.

The business case should explain how the material issue is affecting your business and industry and how it is impacting your company’s bottom line, its stakeholders, and its license to operate. The business case may relate to reducing or avoiding risks or seizing new business opportunities.

The business impact must be selected from the dropdown list provided. Companies can indicate whether the material issue is most closely linked with costs, revenues or risk management. Examples of cost-related issues include the cost of raw materials, production costs, fines or litigation. Revenue-related issues include matters related to, for example, product innovation, competitiveness or market expansion. Risk-related issues include threats to a company’s license to operate, litigation risk, non-compliance, and reputational risk.

Business strategies include the tools, processes and plans that companies use to address the material issues referred to. These could include mitigation plans, product and service strategies, or internal and external initiatives.

Long-term targets should be targets to be achieved in over three years. They may include targets that were set in the past (not in the most recent fiscal year), but the timeframe should be clear. For example, a target set in 2014 would be acceptable if it is clear that the time horizon extends beyond three years from now or from when they were set. Targets should be specific and measurable.

The target year should specifically relate to the reported target and should be reported as a single fiscal year, not a time range.

The question also assesses whether specific material issues are linked to executive compensation. It should be clear that the link is to senior executives and not just line managers or topic experts. For example, it should be clear that targets for environmental issues apply to senior management and not only environmental managers at the operational level with responsibility for this area.

References
GRI Standards 102-15, 102-47, 103-1 are relevant for this question.
3.2.2 Materiality Disclosure

Public: this question requires publicly available information.

Assessment Focus

Question Rationale

Disclosing material sustainability issues to stakeholders is a key component of a company’s communication. Discussing the process and approach for identifying material issues provides context to a company’s reporting and enables stakeholders to understand how a company sets its priorities. The process for identifying these issues should include external stakeholders and be well-documented, and material issues should be clearly defined and prioritized. Furthermore, companies should set targets for the material issues and consistently report on the progress towards achieving the targets aimed at dealing with these issues.

Question Layout

Do you publicly disclose details of your materiality analysis, including information on how you conduct the materiality analysis process and your progress towards your targets or metrics?

- Yes, we publicly disclose this information. Please indicate the information you report on and indicate where this is available in your public reporting.
  - We publicly disclose our materiality analysis, including the most material issues and a description of our process. Please attach supporting evidence.
  - We publicly report on our progress towards our targets or metrics for material issues. Please attach supporting evidence.

Question-Specific Guidance & Definitions

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

Materiality analysis and material issues may be reported on in any of the company’s communication channels, such as its annual report, sustainability report, company website or other public communication. We no longer differentiate between where this information is reported, as long as it is publicly available.

References

GRI Standards 102-15, 102-47, 103-1 are relevant for this question.
3.3 Risk & Crisis Management

Effective risk and crisis management is vital for a company’s long-term financial planning and organizational flexibility. Since the financial crisis, it has gained particular importance. Companies need to implement internal control processes to comply with existing regulations and proactively develop control mechanisms. Our questions focus on risk governance, emerging risks, and the incentives, training, and empowering employees in order to develop an effective risk culture. Additionally, we perform a real-time check to assess the system with our internal MSA (Media and Stakeholder Analysis).

3.3.1 Risk Governance

Assessment Focus

Question Rationale

For a company’s risk management procedures to be effective, risk awareness, concern and management have to stem from the company’s senior management and board of directors. While overall responsibility for risk management lies with the board of directors, it is the senior management team’s duty to translate the strategic direction set by the board into appropriate policies and procedures and to put in place an effective approach to execute and implement those policies. To ensure that the policies are consistent with the risk tolerance of the company’s shareholders, they should be approved by the board.

Question Layout

Please indicate which people, departments and committees are responsible and accountable for enterprise risk management in terms of risk appetite & tolerance as well as risk monitoring & reporting. Please also indicate the expertise and training applicable to non-executive directors as well as the corporate structure of risk management functions.

<table>
<thead>
<tr>
<th>Please indicate name and position</th>
<th>Reporting line: please indicate who the person or committee reports to</th>
</tr>
</thead>
<tbody>
<tr>
<td>Highest ranking person with dedicated risk management responsibility on an operational level (not CEO)</td>
<td></td>
</tr>
<tr>
<td>Highest ranking person with responsibility for monitoring and auditing risk management performance on an operational level (not CEO)</td>
<td></td>
</tr>
</tbody>
</table>
Question-Specific Guidance & Definitions

Under highest responsible person or committee the name and position of the person or body with the respective responsibilities should be indicated. Examples of responsible people or committees include Chief Risk Officer, Risk Committee, Internal Audit and Chief Compliance Officer.

Under Reporting Line the whole reporting line from the responsible people or committee up to the executive managers or board of directors should be provided.

Risk appetite can be defined as “the amount and type of risk that an organization is willing to take in order to meet its strategic objectives”. Organizations will have different risk appetites depending on their industry, culture and objectives. A range of appetites exists for different risks and these may change over time. While risk appetite is about the pursuit of risk, risk tolerance is about what an organization can deal with. Companies should enter here the name of the highest-ranking individual or body in the organization that is responsible for determining the appropriate risk level of the organization. In most cases this would be the Chief Risk officer or the highest-ranking committee responsible for risk management in the company.

Risk monitoring and reporting are needed to ensure policies are carried out and processes are executed in accordance with management’s stated performance goals and risk tolerances. Here the name of the highest-ranking individual or committee responsible for monitoring risk should be provided. This could be Internal Audit or any comparable function independently ensuring that corporate practices are consistent with the company’s risk strategy and policies.

For the option on expertise in (enterprise) risk management for non-executive directors, it is not expected that a large number of board members could have such experience. However, it is considered beneficial to have at least some members on the board with risk management experience. In many non-financial industries this could be someone who has worked in operational risk management, it could also include someone with a finance background who has worked in financial risk assessment. Experience on a risk-related board committee alone is not acceptable; rather, the focus is on professional experience that relates to risk management.

Regular education relates to risk-specific education and training provided to non-executive directors, to ensure that they are informed about the latest risk management practices and are equipped to assess the various forms of risks.

Regular refers to education or training that occurs consistently belong to the company’s scheduled training mechanisms for boardmembers.

Structural independence means that the organization’s risk function is independent of other business functions, departments or divisions, and serves as a means to address risks throughout the entire organization and not just within a specific department. Structural independence enables the objective monitoring and control of various risks in the best interests of the entire organization and without the potential of a conflict of interests arising from other business priorities.

References

GRI Standard 102-19 & 102-20 & 102-29 & 102-30 are relevant for this question.
3.3.2 Sensitivity Analysis and Stress Testing

There are two variations of this question: one general, and one industry-specific that also considers climate and water risks. The latter question is applied to industries considered to have material climate and/or water risks. The guidance in this section applies to both questions.

**Assessment Focus**

**Question Rationale**

Effective risk and crisis management are vital for long-term financial planning and organizational flexibility. Companies need to implement internal control processes to comply with existing regulations and be proactive in developing their control mechanisms.

**To better capture more extreme versions or more uncommon types of risks in addition to market or price risk, robust sensitivity analysis and stress testing should be performed.**

**Question Layout**

Does your company perform sensitivity analysis and stress testing on a group level? Please provide supporting evidence (only one option below should be indicated for the general question, multiple choices are available for the question relating to water and climate).

- Yes, the main focus is on changes in financial risks, such as exchange and interest rates
- Yes, we produce comprehensive scenarios on other factors (in addition to financial risks; such as strategic business risks, market/business environment risks, operational risks, and compliance risks). Please specify which risks are included in your sensitivity analysis and stress testing and attach supporting evidence or indicate website.

The following options are included in the alternate question entitled Sensitivity Analysis and Stress Testing (including Water and Climate):

Does your company perform sensitivity analysis and stress testing on a group level? Please attach supporting evidence.

Reference:_______

- Yes, on changes in financial risks, such as exchange and interest rates
- Yes, on climate change risks
- Yes, on changes in water availability or water quality
- Yes, on other risks (e.g., operational risks, market risks, strategic business risks, compliance risks). Please specify which risks and provide supporting evidence of the sensitivity analysis.

**Question-Specific Guidance & Definitions**

**Sensitivity analysis** is the name given to any procedure that tests the particular outcome of any given set of inputs under a given set of assumptions. It is important in risk analysis because it is a useful tool for gauging the outcome of all kinds of scenarios and events. Analysts conducting sensitivity analysis will ultimately be concerned with determining how changes in one or more inputs could affect the output of interest.

**Stress testing** is a simulation technique used on assets, portfolios or positions of interest to determine their reactions to different events that are not usually captured in more traditional value or risk analysis. Stress tests are used to gauge how certain stressors (events, risks, megatrends) or extreme circumstances could affect a company or industry. They are usually computer-generated simulation models that test hypothetical scenarios. The Monte Carlo simulation is one of the most widely used methods of stress testing.

**Non-financial risks** Risks that arise from the operations of the organization and from sources external to the organization.

**Examples:**

- **Operational risk:** Risk that human error of faulty organizational processes will result in losses.
- **Solvency risk:** Risk that organization will be unable to continue to operate because it has run out of cash.
- **Regulatory risk:** Risk that regulatory environmental will change, imposing costs on the firm or restricting its activities.
- **Governmental or political risk (including tax risk):** Risk that political actions outside a specific regulatory framework, such as increases in tax rates, will impose significant costs on an organization.
- **Legal risk:** Uncertainty about the organization’s exposure to future legal action.
- **Model risk:** Risk that asset valuations based on the organization’s analytical models are incorrect.
- **Tail risk:** Risk that extreme events (those in the tails of the distribution of outcomes) are more likely than the organization’s analysis indicates, especially from incorrectly concluding that the distribution of outcomes is normal.
- **Accounting risks:** Risk that the organization’s accounting policies and estimates are judged to be incorrect.
3.3.3 Emerging Risks

Public: this question requires publicly available information.

Assessment Focus

Question Rationale

It is important for investors to understand the long-term risks that companies face and companies' awareness of the impacts of these risks on their business and any mitigating actions that they may be taking in response to such risks—beyond the ongoing operational risks reported by most companies. In disclosing these risks to investors, companies show their ability to plan effectively for long-term risks. Reporting on long-term risks, their impacts on their business and the mitigating actions they are taking can improve investors' confidence in management's ability to plan effectively for long-term challenges and therefore may make the company a more attractive long-term investment.

Question Layout

Please indicate two important long-term (3–5 years+) emerging risks that your company identifies as having the most significant impact on the business in the future, and indicate any mitigating actions that your company has taken in light of these risks. For each risk, please provide supporting evidence from your public reporting or corporate website where the risk, the business impact and any mitigating actions are described.

<table>
<thead>
<tr>
<th>Description of risk, as reported in the public domain:</th>
<th>Potential business impact of the risk, as described in the public domain:</th>
<th>Mitigating actions, as described in the public domain:</th>
<th>Supporting evidence from the public domain on risk, business impact and mitigating actions:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emerging Risk 1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Emerging Risk 2</td>
<td></td>
<td></td>
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</tbody>
</table>

Question-Specific Guidance & Definitions

The focus should lie on the most significant emerging risks that are expected to have a long-term impact on the company and that are explained in public disclosures. Risks that are considered to be acceptable here include any newly identified risks that are expected to have a long-term impact on the company's business or on the industry, although in some cases they may have already begun impacting the company's business today. In this question, we are not looking for ongoing operational, reputational, legal or regulatory risks.

Impact on the business: it is not expected that a precise financial impact of these risks on the business can already be calculated or estimated, but rather a convincing description of how these emerging risks could impact the business, and therefore its financial results, over time.

The focus of the question is on longer-term emerging risks, i.e., those unlikely to have a significant impact on the company for at least three to five years, but potentially may have begun to have consequences for the company today.

In addition, because the disclosure of long-term emerging risks (beyond operational risks commonly reported by companies or required by regulators) is so important for long-term investors, the risks provided in this question should correspond to risks that are disclosed publicly (either in the annual report or in the company's sustainability reporting). Even if the description in the questionnaire differs from, or is more detailed than what is publicly reported, the best answers will be confirmed by evidence that these risks are also disclosed in reporting to investors.

Data Requirements

This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications...) or corporate website.

Risks and their impact on the company's business should be specific. For example, long-term risks like macroeconomic developments should be described in the context of the business environment that the company operates in (i.e., the specific regulations or laws that may be introduced) and the impact on the company should be specific (i.e., not simply the description of the overall impact on the industry).
3.3.4 Risk Culture

Assessment Focus

Question Rationale

While an effective structure for risk management is essential, events since the credit crisis as well as several high-profile disasters such as the Macondo oil spill have demonstrated the need for strong risk culture throughout the organization to ensure that the importance of risk is understood by all employees.

This question is designed to assess if companies are implementing an effective risk culture across their business.

Question Layout

What strategies does your company pursue in order to promote and enhance an effective risk culture throughout the organization? Please indicate the relevant options below and specify where prompted (multiple options can be indicated).

- Financial incentives that incorporate risk management metrics; please specify the incentives and metrics.
  - For senior executives; please specify:
  - For line managers; please specify:
- Focused training throughout the organization on risk management principles; please specify:
- Inclusion of risk management criteria in the HR review process for employee evaluations
- Measures enabling individual employees to proactively identify and report potential risks throughout the organization; please specify:
- Measures enabling continuous improvement in risk management practices through the involvement of employees in a structured feedback process; please specify:
- Incorporating risk criteria in the product development or approval process
- Other means of measuring or innovating for an effective risk culture; please specify:

Question-Specific Guidance & Definitions

Risk management metrics refer to any risk management measures that may be part of an individual's performance review, or any goal linked to reducing risk that affects compensation, including measures to reduce occupational health and safety incidents or environmental risks.

Risk management in the HR review process can include any element of risk performance (including avoidance of risks) that is included in the review of employee performance.

Measures for reporting risks should be more than whistle-blowing mechanisms. Rather, these should be procedures that enable employees to report potential incidents that could occur, based on their experience. This can in turn be used in order to improve risk management and monitoring.
3.4 Codes of Business Conduct

Economic crime is consistently harmful to a company’s intangible assets (e.g., negative impact on the company’s reputation, on staff morale and on business relationships). Internal controls appear to be inefficient when looking at how economic crimes are actually discovered, suggesting that internal systems are often co-opted, circumvented or overridden.

Companies active in countries with weak anti-corruption laws are exposed to additional reputational and legal risks. Evidence of corrupt practices can result in exclusion from contracts financed by institutions that blacklist suppliers of bribes (e.g., World Bank’s list of debarred firms), potentially impacting future earnings as well as higher risk premiums for debt or equity.

The key focus of the criterion is on the Codes of Conduct, their implementation and the transparent reporting on breaches, as well as the occurrence of corruption & bribery cases and anti-competitive practices.

3.4.1 Codes of Conduct

Public: this question requires publicly available information.

Assessment Focus

Question Rationale

Codes of Conduct are corporate documents outlining a company’s values, principles and guidelines in a variety of areas. Ideally, codes combine aspirations and detailed standards on how to put them into practice, guiding the way the company conducts its business activities.

Codes of Conduct are voluntary but often seen as an important part of company culture, reputation and compliance. With this question, we assess the existence and scope of a company’s Code of Conduct.

Question Layout

Which of the following aspects are covered by your codes of conduct at a group level (including subsidiaries)? Please indicate where this information is available in your public reporting or corporate website.

- Yes, our group-wide codes of conduct are publicly available and specifically include the following:
  - Corruption and bribery
  - Discrimination
  - Confidentiality of information
  - Conflicts of interest
  - Antitrust/anti-competitive practices
  - Money-laundering and/or insider trading/dealing
  - Environment, health and safety
  - Whistleblowing

Question-Specific Guidance & Definitions

Please be aware that Codes of Conduct can come in different formats and have different names (e.g., internal rules, company’s credo, compliance codes, ethics codes, codes of practice, charters).

References

GRI Standards 102-16 & 102-17 are relevant for this question.
3.4.2 Coverage

Assessment Focus

Question Rationale
In order to successfully govern a company’s behavior and mitigate adverse effects, Code of Conduct as well as specific anti-corruption & bribery policies should be as comprehensive as possible – not only in content but also in the scope of application. With this question, we assess the extent to which these policies cover the company itself (including subsidiaries and joint business operations), its employees and its suppliers.

Question Layout
Please complete the following table related to coverage of your codes of conduct, and whether or not written acknowledgement has been obtained and training has been provided in the past three years:

<table>
<thead>
<tr>
<th>% relative to total number of:</th>
<th>Coverage</th>
<th>Written Acknowledgement</th>
<th>Training Provided</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employees</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Contractors/suppliers/service providers</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Subsidiaries</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Joint ventures (including stakes below 51%)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Not applicable. We do not have any joint ventures.</td>
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<td></td>
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</tbody>
</table>

Question-Specific Guidance & Definitions

Coverage indicates that the party (employee, supplier, etc.) is required to comply with the company’s code of conduct.

Written Acknowledgement: Indicates that the party (employee, supplier representative, etc.) has read and signed a document acknowledging that they understand and will comply with (or be responsible for ensuring that their organization complies) the company’s code of conduct.

Training Provided: Indicates that the company has provided training to the party (employee, supplier representative, etc.) to ensure that they adequately understand and are able to comply with (or create systems to ensure that their organization complies with) the company’s code of conduct.

Joint Ventures: We consider JV’s to be two entities coordinating to attain a common goal and contributing resources (financial or other) towards that goal. We are looking whether the company covers the imposing of the Code of Conduct for any of its joint ventures. The coverage asked for in this question is the scope explicitly indicated in the code of conduct itself; that is, it should be indicated in the policy to what extent the policy (or connected policies such as a supplier code of conduct with identical content) covers employees, suppliers, etc.

Data requirements

Employees group/worldwide: % in terms of total headcount.
- Coverage: count of employees covered/total headcount
- Written acknowledgement: count of employees that have signed acknowledgement/total headcount
- Training Provided: count of employees/total headcount

Contractors/Suppliers/Service providers, Subsidiaries, Joint Ventures: % in terms of total count of organizations.
- Coverage: count of organizations covered/total number of organizations
- Written acknowledgement: count of organizations with signed acknowledgement/total number of organizations
- Training Provided: count of organizations where training has been provided/total number of organizations

3 year time requirement: In order to be included in the count of those with written acknowledgement and having received training, the acknowledgment must have been signed and the training received in the past three years.

Please also refer to the Business Principles for Countering Bribery, an initiative of Transparency International and Social Accountability International.

References
GRI Standard 205-2 are relevant for this question.
3.4.3 Corruption & Bribery

Public: this question requires publicly available information.

Assessment Focus

Question Rationale

Corruption and bribery are economic crimes that are consistently harmful to a company’s intangible assets (such as its reputation, staff morale, or business relationships). Companies doing business in countries with weak anti-corruption and bribery laws are exposed to additional reputational and legal risks.

Evidence of corrupt practices can result in a company’s exclusion from contracts financed by institutions that blacklist bribe suppliers (for example, the World Bank’s list of debarred firms), potentially affecting the company’s future earnings. Due to the additional types of risk that corruption introduces, it creates uncertain consequences for investors, and therefore increases the risk premium a company must pay for debt or equity. This question assesses the anti-corruption and bribery policy a company has in place to complement legal requirements (or to compensate for the lack of such requirements in certain countries). Because political and charitable contributions can be used as subterfuge for bribery, they should be explicitly covered by the anti-corruption policy and should be publicly disclosed.

Question Layout

Which of the following aspects are covered by your anti-corruption and bribery policy at a group level (including subsidiaries)?

Please indicate where this information is available in your public reporting or corporate website. Please also ensure that the marked options are both covered by your company’s policy and are clearly disclosed in the attached public documents.

- Yes, our group-wide anti-corruption and bribery policy is publicly available and specifically includes the following:

- Bribes in any form (including kickbacks) on any portion of contract payments or soft dollar practices
- Direct or indirect political contributions
  - Political contributions publicly disclosed. Please attach supporting evidence and/or provide a weblink:
- Charitable contributions and sponsorship
  - Charitable contributions and sponsorship publicly disclosed. Please indicate web address:

Question-Specific Guidance & Definitions

Kickback: A kickback refers to a share of misappropriated funds paid by one organization to another in a case of corrupt bidding. This can occur in a business context or in any other situation in which people are entrusted to spend funds that do not belong to them. In this context, a company would win a contract in a public bidding process even though the quote it provides exceeds the market price or best offer. For the benefit of having won the contract, the provider of the service then pays a kickback (for example, the difference between the overvalued and the actual market price, or part of this difference) to the buyer.

Soft dollar: The term soft dollar is used in the finance industry and refers to in-kind payments made by a money manager (a fund, investor, etc.) to its service providers. Instead of paying the service providers with cash (i.e., hard dollars), the investor pays in-kind (i.e., with soft dollars) by passing on business to its service providers.

Political contributions and charitable donations: This question specifically considers contributions and donations that act as a means of bribery and corruption, and this needs to be explicitly addressed in the attached policies. In the context of this question, disclosure on details of contributions and donations is only considered for topics that are specifically covered in the relevant policy. Other aspects related to political contributions and charitable donations that are not linked to bribery or corruption are addressed in other parts of the questionnaire.

Data Requirements

Please ensure that the marked options are both covered by your company’s policy and are clearly disclosed in the attached documents.

References

- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, 1997
- Business Principles for Countering Bribery, 2008
  (by Transparency International, second edition)

GRI Standard 102-16 is relevant for this question.
3.4.4 Systems/Procedures

Assessment Focus

Question Rationale

As with every strategy or goal, a code of conduct is only as good as the extent to which it is complied with. A company therefore needs to have proper systems and procedures in place to ensure its code of conduct is implemented and assure its employees, creditors, business partners, shareholders and other stakeholders that internal systems will not be co-opted, circumvented or overridden.

Question Layout

What mechanisms are in place to ensure effective implementation of your company’s codes of conduct (e.g. compliance system) [multiple options can be indicated]?  

- Responsibilities, accountabilities and reporting lines are systemically defined in all divisions and group companies
- Dedicated help desks, focal points, ombudsman, hotlines
- Compliance linked to employee remuneration
- Employee performance appraisal systems integrate compliance/codes of conduct
- Disciplinary action in the event of breaches, e.g. warnings, dismissal, zero-tolerance policy
- Compliance system is certified/audited/verified by third party; please specify: _________

Question-Specific Guidance & Definitions

For the certification/audit/verification of the compliance system, only independent third parties are accepted. Internal audit is not considered an independent third party.

References

GRI Standards 102-16 & 102-17 are relevant for this question.
3.4.5 Anti-Competitive Practices

Assessment Focus

Question Rationale
In the question, we assess whether or not a company has been convicted of breaching antitrust regulations in the past. Past breaches indicate gaps in a company’s codes of conduct or a failure to uphold its codes across its operations. Further, we assess whether or not there are ongoing allegations against a company concerning potential anti-competitive behavior.

Question Layout
Please indicate the amount of fines and settlements (excluding legal fees) incurred in the last four fiscal years related to anti-trust/anti-competitive practices and the number of currently pending investigations against your company.

Past Cases
Did your company incur any fines or settlements related to anti-competitive business practices in the past four fiscal years?
- Yes, we incurred fines or settlements, as indicated below:

<table>
<thead>
<tr>
<th>Fines and Settlements</th>
<th>Currency</th>
<th>FY 2015</th>
<th>FY 2016</th>
<th>FY 2017</th>
<th>FY 2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total amount</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>% of revenues</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Ongoing Cases and Contingent Liabilities
Is your company currently involved in any ongoing investigations related to anti-competitive practices?
- Yes, we are currently the subject of _____ ongoing investigations

Question-Specific Guidance & Definitions
Anti-competitive behavior includes but is not limited to cartel activities, price fixing, and anti-trust activities.

Data requirements
Past cases: Please clearly indicate whether or not fines were paid in the past fiscal year.

Ongoing cases: Please clearly mark whether or not there are any ongoing cases and if so, whether or not contingent liabilities have been recorded. If there are no ongoing cases, please mark this option.

Disclosure shall include civil actions (e.g., civil judgments, settlements, or regulatory penalties) and criminal actions (e.g., criminal judgment, penalties, or restitutions) taken by any entity (government, business, or individuals) Source: SASB

If your company has neither past nor current antitrust cases, please select "Not applicable" at the bottom of the question.

References
SASB metrics on Pricing Integrity & Transparency, under various industry codes including NR0401-13, are relevant for this question.

GRI Standard 206-1 is relevant for this question.
3.4.6 Corruption & Bribery Cases

Assessment Focus

Question Rationale

Corruption and bribery are economic crimes that are consistently harmful to a company’s intangible assets (such as its reputation, staff morale, or business relationships). Companies doing business in countries with weak anti-corruption and bribery laws are exposed to additional reputational and legal risks. Evidence of corrupt practices can result in a company’s exclusion from contracts financed by institutions that blacklist suppliers of bribes (for example, the World Bank’s list of debarred firms), potentially affecting its future earnings. Due to the additional types of risk that corruption introduces, it creates uncertain consequences for investors, and therefore increases the risk premium a company has to pay for debt or equity. This question assesses the number of confirmed corruption and bribery cases against the company in the past four years.

Question Layout

Please indicate the number of substantiated cases of corruption and bribery in the last four fiscal years as well as the number of ongoing external investigations by local or international authorities.

- Past Cases
  Did your company have any confirmed cases of corruption and bribery in the past four fiscal years?
    - Yes we had confirmed cases of corruption and bribery, as indicated below:

<table>
<thead>
<tr>
<th>Fines and Settlements</th>
<th>FY 2013</th>
<th>FY 2014</th>
<th>FY 2017</th>
<th>FY 2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of substantiated corruption &amp; bribery cases</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- No we did not have confirmed cases of corruption & bribery during the past four fiscal years

- Ongoing cases
  Is your company currently involved in any ongoing investigations related to corruption and bribery?
    - Yes we currently have ______ ongoing investigations against us.
    - No, we are not currently involved in any ongoing corruption & bribery cases

Question-Specific Guidance & Definitions

Corruption is "the abuse of entrusted power for private gain" (Transparency International) and can be instigated by individuals or organizations. In the GRI Guidelines, corruption includes practices such as bribery, facilitation payments, fraud, extortion, collusion, and money laundering. It also includes an offer or receipt of any gift, loan, fee, reward, or other advantage to or from any person as an inducement to do something that is dishonest, illegal, or a breach of trust in the conduct of the enterprise’s business (these definitions are based on Transparency International, 'Business Principles for Countering Bribery', 2011). This may include cash or in-kind benefits, such as free goods, gifts, and holidays, or special personal services provided for the purpose of an improper advantage or that may result in moral pressure to receive such an advantage.”

Source: G4-S05

Substantiated: a government, regulatory, industry association, self-regulatory, or a similar body, or the company itself has determined there was a case of corruption. A case in the appeal process is considered to have been substantiated during the appeal, and is only considered unsubstantiated once there has been a ruling on the appeal.

Data Requirements:
Please include only incidents of corruption that have been substantiated. This does not include incidents that are currently pending investigation.

References
GRI Standard 205-3 are relevant for this question.
3.4.7 Reporting on Breaches

Public: This question requires publicly available information.

Assessment Focus

Question Rationale
Organizations are increasingly expected by the marketplace, international norms, and stakeholders to demonstrate their adherence to integrity, governance, and good business practices. Reporting to authorities is mandatory in many countries but our questions are looking for evidence of transparent corporate reporting to all stakeholders. This question assesses the transparency a company shows in relation to breaches of its codes of conduct or anti-corruption & bribery policies towards its stakeholders, both for the occurrence of incidents as well as the company’s response.

Question Layout
Does your company publicly report on breaches (e.g. number of breaches, cases, etc.) against your codes of conduct/ethics? Please specify where this information is available in your public reporting or corporate website.
- Yes, we publicly report on breaches to our codes of conduct.
- We publicly report that no breaches have occurred during the most recent reporting cycle.

Question-Specific Guidance & Definitions
Both the disclosure of code of conduct breaches and the comprehensiveness of the disclosure are assessed. When assessing the comprehensiveness of the disclosure, aspects such as the number of cases, the types and categories of cases, and the consequences of the breaches are considered. Filings to authorities that are not publicly available to all stakeholders will not be considered here.

If there were no code of conduct breaches, the second option "We publicly report that no breaches have occurred during the most recent reporting cycle" should be chosen. The absence of breaches needs to be publicly disclosed for the purpose of this question and an indication of where this is publicly reported should be given. A comment indicating that no breaches occurred and that reporting would have been available in the event of such breaches occurring is not sufficient for this question.

Data Requirements
Please note that if your company did not have any code of conduct breaches, please tick "Yes, please refer to the reference(s) provided:" and indicate where this is publicly reported.

References
- [OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, 1997](#)
- [United Nations Convention Against Corruption, 2003](#)

GRI Standards 102-17 & 205-3 are relevant for this question.
3.5 Policy Influence

Although companies legitimately represent themselves in legislative, political and public discourse, excessive contributions to political campaigns, lobbying expenditures and contributions to trade associations and other tax-exempt groups may damage companies’ reputations and creates risks of corruption. In this criterion, we evaluate the amount of money companies are allocating to organizations whose primary role is to create or influence public policy, legislation and regulations. We also ask for the largest contributions to such groups, and we assess the public disclosure on these two aspects.

3.5.1 Contributions and Other Spending

*Partially public; additional credit will be granted for relevant publicly available evidence.*

**Assessment Focus**

![Image]

**Question Rationale**

Although companies legitimately represent themselves in legislative, political and public discourse, excessive contributions to political campaigns, lobbying expenditures and contributions to trade associations and other tax-exempt groups may damage companies’ reputations and creates risks of corruption. In this criterion, we evaluate the amount of money companies are allocating to organizations whose primary role is to create or influence public policy, legislation and regulations. We also ask for the largest contributions to such groups, and we assess the public disclosure on these two aspects.

**Question Layout**

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

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

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

  **Reference Link.**

<table>
<thead>
<tr>
<th>Contributions to:</th>
<th>Currency</th>
<th>FY 2015</th>
<th>FY 2016</th>
<th>FY 2017</th>
<th>FY 2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lobbying, interest representation or similar</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Local, regional or national political campaigns/candidates</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Trade associations or tax-exempt groups (e.g., think tanks)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other (spending related to ballot measures, referendums, etc.)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total contributions and other spending</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Data coverage (% of denominator)</td>
<td>Percentage</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
- We can only report the total spending figures. Please indicate the items included in your total spending figures. If an item is not included, please select "not included". If you have not made any contributions for a specific category, please select "No contribution." Please also indicate if these figures are provided in your public reporting.

<table>
<thead>
<tr>
<th>Lobbying, interest representation or similar</th>
<th>Drop-down menu:</th>
<th>Included</th>
<th>Not included</th>
<th>No contribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local, regional or national political campaigns/candidates</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Trade associations or tax-exempt groups (e.g., think tanks)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other (spending related to ballot measures, referendums or other areas)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Total Contributions and other Spending</th>
<th>Currency</th>
<th>FY 2015</th>
<th>FY 2016</th>
<th>FY 2017</th>
<th>FY 2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Data coverage (% of denominator)</td>
<td>Percentage of:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Data Requirements

The company shall report its total monetary contributions to political campaigns or organizations, lobbyists, trade associations and other tax-exempt groups whose role is to influence political campaigns or legislation. This includes all direct and indirect spending, contributions or payments to:

- Political campaigns, ballots measures or referendums.
- Political organizations, trade associations or tax-exempt groups whose role is to influence political campaigns or legislative activities, including chambers of commerce, trade boards, and the like. This includes membership fees towards trade associations, industry associations and business associations.
- Registered lobbyists and lobbying groups.
- Companies do not need to report the monetary value of in-kind giving, employee volunteering or management overheads related to the activities described above.

Note: PAC contributions by employees should not be included.

Source: SASB and GRI.

### References

- SASB Political Spending (the specific standard number is dependent on industry)
- GRI Standard 415-1 is relevant for this question

**Disclosure requirements for partially public question**

Additional credit will be granted for relevant publicly available evidence covering at least one figure in the last reported year. If no contributions were made for a specific item or category (e.g., zero political contributions in the last fiscal year), companies should publicly report this information.
3.5.2 Largest Contributions and Expenditures

*Partially public: additional credit will be granted for relevant publicly available evidence*

**Assessment Focus**

![Image](image)

**Question Rationale**

Although companies legitimately represent themselves in legislative, political and public discourse, excessive contributions to political campaigns, lobbying expenditures and contributions to trade associations and other tax-exempt groups may damage companies' reputations and creates risks of corruption. In this question, we ask for the largest contributions or expenditures to organizations whose primary role is to create or influence public policy, and assesses the extent to which this information is provided to the public.

**Question Layout**

Did your company make any contributions to or expenditures to political campaigns or organizations, lobbying, trade associations, tax-exempt entities, or other groups whose role is to influence political campaigns or public policy and legislation? In this context, a “contribution” is the aggregate amount given during the fiscal period to an individual candidate, organization, ballot measure, or “issue area” or “topic” requiring lobbying efforts. Please see the Information Button for examples. **PAC contributions by employees should not be included.** Please also indicate if this reporting is available in your public reporting. If you made less than three contributions, please select "No contribution" under "Type of organization" in the appropriate row.

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

**Issues and Topics**

<table>
<thead>
<tr>
<th>Issue or topic</th>
<th>Corporate Position</th>
<th>Description of Position/Engagement</th>
<th>Total spend in FY 201X Currency</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. ______</td>
<td>Drop-down menu:</td>
<td>1. ______</td>
<td>1. ______</td>
</tr>
<tr>
<td></td>
<td>Support</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Support with minor exceptions</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Support with major exceptions</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Neutral</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Oppose</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Undecided</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>No contribution</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. ______</td>
<td>2. Drop-down menu</td>
<td>2.</td>
<td>2.</td>
</tr>
</tbody>
</table>
## Other Large Expenditures

<table>
<thead>
<tr>
<th>Name of organization, candidate or topic</th>
<th>Type of organization</th>
<th>Total amount paid in FY 2018 Currency _______</th>
</tr>
</thead>
<tbody>
<tr>
<td>3. __________</td>
<td>Drop-down menu:</td>
<td>3. _______</td>
</tr>
<tr>
<td></td>
<td>- National political organization</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- State or local political campaign, candidates or committees</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Political Action Committee (PAC)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Lobbying, interest representation or similar</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Trade association</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Tax-exempt group</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Other: Please specify: _______</td>
<td></td>
</tr>
<tr>
<td>5. __________</td>
<td>5. Drop-down menu</td>
<td>5.</td>
</tr>
</tbody>
</table>

### Question-Specific Guidance & Definitions

**Largest contributions** In this context, a "contribution" is the aggregate amount given during the fiscal period to an individual candidate, organization, ballot measure, or "issue area" or "topic" requiring lobbying efforts. For example:

**Sugar taxes** The total amount of lobbying expense for the fiscal period shall be reported as one line item. The expenses may have been related to several activities around the world: a ballot initiative in California, legislation being considered by the US federal government and legislation pending in the UK. **Drug pricing** The total amount of lobbying expense for the fiscal period shall be reported as one line item. The expenses may have been related to several state ballot initiatives in the US.

**Data requirements**

Companies should report their largest "contributions" to political campaigns or organizations, lobbyists, trade associations and other tax-exempt group, related to individual candidates, organizations, ballot measure or referendum, or topic for which lobbying were contracted. This includes all contributions, donations and membership fees towards trade associations, industry associations and business associations. Companies do not need to report the monetary value of in-kind giving, employee volunteering or management overheads related to the activities mentioned above. If local legislation prevents you from making political or other contributions, please mark “Not applicable” and provide an explanation in the company comment box.

In contrast to previous years, there are now two distinct aspects to this question: the two top issues and the three largest single contributions/payments. There may therefore be some overlap, if the spending on the issues is done by the trade associations. If your largest contributions go to trade/business associations, our preference is that you are able to inquire with the trade association(s) as to the percentage of your contribution allocated to lobbying for specific issues. However, we realize this may not be feasible in this first year of asking the question this way. If the trade association cannot provide this level of detail, an estimate will suffice. In the worst case, for the first part of this question we ask you to report your direct lobbying expenditures only, even if the amounts are small.

Note: Please do not include contributions to charities whose main purpose is something other than supporting specific political parties or causes, e.g., they primarily provide healthcare to an at risk population or food and shelter to the poor.

**Disclosure requirements for partially public question**

Additional credit will be granted for relevant publicly available evidence covering at least three of the largest contributions and expenditures described.

### References

- SASB Political Spending (Specific code dependent on industry, for example: SV0202-09 for Casinos & Gaming, NR0104-16 for Oil & Gas Services)
- GRI Standard 415-1 are relevant for this question.
3.6 Supply Chain Management

In an increasingly globalized world, when a company outsources its production, services or business processes, it also outsources corporate responsibilities and reputational risks. This means that companies need to find new strategies to manage the associated risks and opportunities which differ from the traditional risk and opportunity management with the company’s production or services in-house. In addition, the company is confronted with the need to minimize costs and time of delivery to satisfy suppliers’ demand and increase profitability without negatively impacting product quality or incurring high environmental or social costs. Investors increasingly see the importance of supply chain risk management and the negative consequences if it is not managed effectively. This criterion aims to identify companies with lower supply chain risk profiles, either through supply chain characteristics or through appropriate management of existing risks. In addition, we seek to identify companies that are using sustainable supply chain management as an opportunity to improve their long-term financial performance.

Please note: Only general or almost-general (applying to at least 40 industries) questions are covered in this section. There might be additional industry-specific questions related to supply chain management in the questionnaire, and some questions below might not apply to your company.

3.6.1 Supplier Code of Conduct

Public: this question requires publicly available information.

Assessment Focus

Question Rationale

Companies not only outsource production, services and business processes but responsibilities, risks and opportunities as well. On one hand, outsourcing generally tends to increase a company’s flexibility, but on the other hand, supply chain risks might become less apparent, new dependencies may arise, and the identification, monitoring and management of risks and opportunities in the supply chain may become more difficult.

A general supplier code of conduct summarizes and represents the basic commitments a company requires from its suppliers. It also serves as a first information source for prospective suppliers. With this question, we assess if your company has a supplier code of conduct, if it is public, and what issues it covers.

Question Layout

Does your company have a Supplier Code of Conduct and is it publicly available? Please provide a weblink and indicate which of the listed issues are covered in the Code and applied to all operations across all countries.

- Yes, our company has a Supplier Code of Conduct and it is publicly available. The Code covers the following issues:
  - Environmental standards for the suppliers’ processes, products or services
  - Child labor
  - Fundamental human rights (e.g., labor, freedom of association, ILO conventions)
  - Working hours, lay-off practices, remuneration
  - Occupational health and safety
  - Business ethics (e.g., corruption, anti-competitive practices)
  - Our suppliers should have a sustainable procurement policy in place for their own suppliers
  - Other, please specify: ————

Question-Specific Guidance & Definitions

A supplier code of conduct describes the principles, values, standards, or rules of behavior that guide the decisions, procedures and systems of the supplier in a way that (a) contributes to the welfare of its key stakeholders, and (b) respects the rights of all constituents affected by its operations.

It usually includes at least the following components:

- **Labor practice and standards:** This includes safeguards against child labor, non-discrimination, health and safety, working conditions, working hours, compensation, right to association, freely chosen employment.
- **Environmental policy:** This comprises product and materials use and technology of transport system.
- **Ethics:** Establishing anti-corruption measures, and adhering to fair business practices in winning business, employees, and in managing partner relationships (e.g., ‘upstream’ in the supply chain)

References

- For the definition of the supplier code of conduct see also the International Federation of Accountants.
3.6.2 Awareness

Supporting evidence is required for parts of this question.

Assessment Focus

Question Rationale

Companies not only outsource production, services and business processes but responsibilities, risks and opportunities as well. On one hand, outsourcing generally tends to increase a company’s flexibility, but on the other hand, supply chain risks might become less apparent, new dependencies may arise, and the identification, monitoring and management of risks and opportunities in the supply chain may become more difficult.

An important first step in supply chain management is to try to understand supply chain risks and dependencies from a general, economic point of view. Once a company has identified its critical suppliers, it can focus its supply chain monitoring and risk management efforts on those suppliers with the potential to cause problems. Therefore, this question seeks to understand to what extent companies are able to identify their critical suppliers.

Question Layout

Does your company identify critical suppliers?
- Yes, our company identifies critical suppliers

Definition of critical suppliers
Please indicate which of the following elements are considered in your definition of critical suppliers and attach supporting evidence describing the process of identifying critical suppliers:
- High-volume suppliers or similar
- Critical component suppliers or similar
- Non-substitutable suppliers or similar
- Other, please specify:

Critical tier 1 and non-tier 1 suppliers

Please indicate how many critical tier 1 and critical non-tier 1 suppliers you have identified. If you did not identify any suppliers in one of the categories, please provide an explanation in the comment box at the end of the question.

<table>
<thead>
<tr>
<th>Type of supplier</th>
<th>Absolute number of suppliers</th>
<th>Share of total procurement spent (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total tier 1 suppliers</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Critical tier 1 suppliers</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Critical non-tier 1 suppliers</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Question-Specific Guidance & Definitions

**Critical suppliers** are defined by us as suppliers whose goods or services have a significant impact on the competitive advantage, market success or survival of the company. Critical suppliers include high-volume suppliers, suppliers of critical components and non-substitutable suppliers.

**Critical non-tier 1 suppliers**: refers to suppliers that are considered critical (see definition above), and provide their products and services to the supplier at the next level in the chain (e.g. Tier-2 suppliers to Tier-1).

**Tier 1 suppliers**: refers to suppliers that directly supply goods or services to the company.

**Tier 2 and lower**: provide their products and services to the supplier at the next level in the chain (e.g. Tier-2 supplies to Tier-1).

References

GRI Standards 102-9, 414-2, 409-1, 408-1, 407-1, 308-2 are relevant for this question.
3.6.3 Risk Exposure

**Supporting evidence is required for parts of this question.**

**Assessment Focus**

**Question Rationale**

Companies not only outsource production, services and business processes but responsibilities, risks and opportunities as well. On one hand, outsourcing generally tends to increase a company’s flexibility, but on the other hand, supply chain risks might become less apparent, new dependencies may arise, and the identification, monitoring and management of risks and opportunities in the supply chain may become more difficult.

This question seeks to assess if companies have a systematic approach to identifying and defining potential sustainability risks in their supply chain. Companies able to properly identify high risk suppliers will also be better positioned to prioritize their risk management measures and proactively detect issues connected to suppliers’ ESG performance.

**Question Layout**

Does your company have a formalized process in place to identify potential sustainability risks in the supply chain?  
- Yes, we have a formalized process in place.

**Formal risk identification process**

Please provide a brief description of your company’s sustainability risk identification process. Explain, for instance, how your company identifies suppliers with potentially higher sustainability risks, or describe the higher risks which are typically found or expected to be found, or how these potential risks are linked to your overall supply chain management strategy. Please attach supporting evidence showing this process.

**Sustainability risk assessment scope and targets**

Please indicate the scope of the sustainability risk assessments performed for tier 1 and critical non-tier 1 suppliers. Site visits, questionnaires, external sustainability agencies, stakeholder information, external databases, news watches, etc., are all acceptable types of assessments in this part of the question. If a supplier has been assessed multiple times in the last three years, it should only be counted once.

Please also indicate if you have a target in place and by what year that target should be achieved.

<table>
<thead>
<tr>
<th>Type of supplier</th>
<th>Number of suppliers assessed in the last 3 years</th>
<th>% of suppliers in that category assessed in the last 3 years</th>
<th>Description of Target</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tier 1 suppliers</td>
<td></td>
<td></td>
<td>Please provide a description of your target: Target Year:</td>
</tr>
<tr>
<td>Critical non-tier 1 suppliers</td>
<td></td>
<td></td>
<td>Please provide a description of your target: Target Year:</td>
</tr>
</tbody>
</table>

**Definition of “sustainability high-risk”**

Please provide the definition or the description that your company uses for "sustainability high-risk."

**Share of sustainability high-risk suppliers**

Please indicate the current share of your company’s total number of tier 1 suppliers (both critical and non-critical) as well as the share of your non-tier 1 suppliers for which you have identified a high level of sustainability risk in the table below. If you have not identified any suppliers as being high sustainability risk, please report "0" in the relevant fields. This information will be used in the proceeding question "Risk Management Measures".
<table>
<thead>
<tr>
<th>Type of supplier</th>
<th>Number of suppliers classified as high-risk</th>
<th>Percentage of total suppliers in that category classified as high-risk (based on total number of suppliers in that category provided in “Awareness” question). The values should not exceed 100%.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total tier 1 suppliers</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Critical non-tier 1 suppliers</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Question-Specific Guidance & Definitions**

**Critical suppliers** They are defined as suppliers whose goods, materials, services (including intellectual property (IP)/patents) have a significant impact on the competitive advantage, market success or survival of the company. Critical suppliers include high-volume suppliers, suppliers of critical components and non-substitutable suppliers.

**Tier 1 suppliers** refers to suppliers that directly supply goods or services to the company.

**Tier 2 and lower** provide their products and services to the supplier at the next higher level in the chain (E.g. Tier-2 supplier to Tier-1)

**Number of suppliers assessed** in the last 3 years refers to the total number of the suppliers assessed in the last three years (Year 1 + Year 2 + Year 3)

**Percentage of suppliers assessed** in the last 3 years refers to the number of suppliers assessed in the last three years divided by the total absolute number of suppliers in the current year (as provided in the awareness question)

**High-risk supplier** is defined as those suppliers that have a high probability of causing an adverse impact on the organization due to social, environmental and/or economic misconduct. The definition of high-risk supplier must contain a set of relevant criteria used for the classification, the rationale for such criteria and the risk level identification process.

**References**

GRI Standards 308-2, 414-2, 409-1, 408-1 & 407-1 are relevant for this question.
3.6.4 Risk Management Measures

Supporting evidence is required for parts of this question.

Assessment Focus

Question Rationale
Companies not only outsource production, services and business processes but responsibilities, risks and opportunities as well. On one hand, outsourcing generally tends to increase a company's flexibility, but on the other hand, supply chain risks might become less apparent, new dependencies may arise, and the identification, monitoring and management of risks and opportunities in the supply chain may become more difficult.

This question seeks to assess if companies have a systematic approach to monitoring sustainability risks in their supply chain.

Question Layout
Please indicate which measures your company has taken in order to manage sustainability risks amongst your critical suppliers (tier 1 and non-tier 1) and your high sustainability risk suppliers. Please indicate the scope and attach supporting evidence or specify where requested.

- Our company measures sustainability risks in the supply chain on an ongoing basis.

Ongoing sustainability monitoring: Please indicate the standard frequency of a more comprehensive assessment of your suppliers and attach supporting evidence (for example a process describing the system that tracks assessments' frequency). By "more comprehensive," we mean an assessment including at least a company visit either by your company’s own personnel or by external third parties, for instance sustainability agencies.

Please note that the percentage of suppliers assessed at least once every three years should NOT include the companies assessed annually.

Please also note that it is possible that there is some overlap between critical suppliers and suppliers with high sustainability risk.

<table>
<thead>
<tr>
<th>Type of supplier</th>
<th>Percentage assessed annually</th>
<th>Percentage assessed at least once every 3 years</th>
</tr>
</thead>
<tbody>
<tr>
<td>Critical suppliers (tier 1 and non-tier 1)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Suppliers with high sustainability risk</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Corrective action plans for suppliers
Please attach a sample as supporting document and indicate the percentage of assessed or audited suppliers for which corrective action plans have been developed.

Further, please indicate what percentage of suppliers with a corrective action plan has improved their ESG performance since the action plan was launched.

<table>
<thead>
<tr>
<th>Measure</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>% of current suppliers with high sustainability risk (following the definition in the question <em>Risk Exposure</em> where gaps have been identified) that have corrective action plans</td>
<td></td>
</tr>
<tr>
<td>% of current suppliers with corrective action plans that have improved their ESG performance within 12 months of the plan’s launch</td>
<td></td>
</tr>
</tbody>
</table>

Question-Specific Guidance & Definitions

Critical suppliers are defined by us as suppliers whose goods or services have a significant impact on the competitive advantage, market success or survival of the company. Critical suppliers include high-volume suppliers, suppliers of critical components and non-substitutable suppliers.

Tier 1 suppliers refers to suppliers that directly supply goods or services to the company.

Tier 2 and lower provide their products and services to the supplier at the next higher level in the chain (e.g. Tier-2 supplies to Tier-1)

References
GRI Standards 308-2, 409-1, 408-1 & 407-1 are relevant for this question.
3.6.5 ESG Integration in Supply Chain Management Strategy

Supporting evidence is required for parts of this question.

Assessment Focus

Question Rationale

Companies not only outsource production, services and business processes but responsibilities, risks and opportunities as well. On one hand, outsourcing generally tends to increase a company's flexibility, but on the other hand, supply chain risks might become less apparent, new dependencies may arise, and the identification, monitoring and management of risks and opportunities in the supply chain may become more difficult.

The ability to systematically integrate sustainability objectives into the overall supply chain strategy shows a strategic dedication to making the supply chain more sustainable which will give the company a better position when it comes to leveraging opportunities and mitigating risks arising in the supply chain. This question aims to assess the extent to which sustainability is integrated into the supply chain strategy and how this is implemented into the business activities such as supplier selection.

Question Layout

Please indicate the main priorities of your company's general supply chain management strategy as well as the environmental, social and governance (ESG) objectives that have been identified in your company. Further, please indicate how ESG factors are integrated in your supplier selection decisions.

General supply chain strategy: Please provide a brief description of the top five priorities of your company's general supply chain management strategy and attach supporting evidence. Please note that this should refer to the general approach that the company is taking in order to manage the supply chain with regards to aspects such as cost, time, quality and continuity of supply and not to a sustainable sourcing or a sustainable supply chain strategy.

Integration of ESG objectives: Please indicate which formalized environmental, social and governance (ESG) objectives have been identified for your supply chain management strategy. Further, indicate how these are connected to the overall supply chain strategy by providing supporting evidence. Please note that in this section you can refer to a sustainable sourcing strategy or a sustainable supply chain strategy as well as to objectives relating to ESG factors already integrated in the strategy above.

<table>
<thead>
<tr>
<th>Type of supplier</th>
<th>Description of ESG objective</th>
<th>Link to overall supply chain strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Key ESG Objective 1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Key ESG Objective 2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Integration of ESG factors into supplier selection

Please complete the table below, indicating how ESG factors impact your supplier selection and retention process. Please attach supporting evidence and provide a brief description on the scale and approach for the minimum threshold for either new suppliers, existing suppliers or both.

<table>
<thead>
<tr>
<th>Please indicate if the threshold is for new suppliers, existing suppliers or both:</th>
<th>Minimum quantitative/qualitative threshold required (i.e. certified management systems in place, requiring to replicate own standards down the supply chain, minimum score at ESG assessment, etc.):</th>
</tr>
</thead>
</table>

Does your company use a % (weight) of ESG in the overall assessment of suppliers (compared to other factors such as price, quality and delivery time), as a tool to ensure integration of sustainability into supplier selection and retention decisions?

If so, please provide an estimate of the average weight across supplier categories: _______

and indicate for which supplier categories this weight factor is being applied:______
Question-Specific Guidance & Definitions

In the first section we refer to the General Supply Chain Management Strategy, which does not refer to specific sustainability or ESG aspects but rather to the overall strategy and directives that guide sourcing and buyer decisions. In the second section we request information on ESG objectives and how they link to the overall strategy, and here you can refer to sustainability aspects of the general strategy if such objectives exist or to a separate sustainable sourcing strategy or similar. Our main aim is to see whether there might be conflicting requirements; for example, a general strategy focused on price and short lead times, and a sustainable sourcing policy that seeks to minimize air transport.

The percentage weight allocated to ESG factors in supplier selection refers to a practice in which sustainability or ESG criteria are considered an integral part of supplier selection, together with other factors such as price, quality and delivery time. It should be clear that such criteria are consistently applied across the product group for which this is indicated. Tier 1 suppliers refers to suppliers that directly supply goods or services to the company.

References

GRI Standards 308-1 & 414-1 are relevant for this question.
3.6.6 Transparency & Reporting

Public: this question requires publicly available information.

Assessment Focus

Question Rationale
Companies not only outsource production, services and business processes but responsibilities, risks and opportunities as well. Outsourcing generally tends to increase a company’s flexibility, but supply chain risks might become less apparent, new dependencies may arise, and the identification, monitoring and management of risks and opportunities in the supply chain may become more difficult. To ensure credibility and trust amongst investors as well as other stakeholders, it is crucial that companies transparently report on processes as well as results connected to their supply chains. This question seeks to assess the extent to which companies are publicly reporting on aspects regarding supplier risk and performance.

Question Layout
Which aspects of your supply chain management approach does your company publicly report on (on a consolidated basis)?
- We publicly report our supply chain management approach

Supply chain management approach transparency
Please attach supporting evidence and/or website where the information can be found in the public domain.
- Supply chain spend analysis (containing basic spend analysis information such as: number of suppliers, category, spend value and geographic spread)
- Supply chain awareness (identification of critical suppliers)
- Supply chain risk assessment and corrective actions (e.g., supplier sustainability assessment)
- ESG integration in supply chain management strategy (e.g., minimum thresholds or alignment of overall supply chain management strategy with ESG objectives)

Reporting Quantitative KPIs and targets
Please indicate below the extent to which your company reports on supply chain management sustainability key performance indicators (KPIs) in the public domain and provide the targets linked to these indicators. The Annual Report, Sustainability Report and corporate website are considered to be relevant public communication sources.

If available, please select KPIs with at least three years of history, well-defined targets and clear reporting on progress towards these targets.

<table>
<thead>
<tr>
<th>Type of supplier</th>
<th>Please specify the KPI and attach the public reference together with the page number where the supply chain indicator is publicly reported:</th>
<th>Please specify the target that is linked to the KPI and attach the public reference together with the page number where the target of the supply indicator is publicly reported:</th>
</tr>
</thead>
<tbody>
<tr>
<td>KPI 1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>KPI 2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>KPI 3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Question-Specific Guidance & Definitions
This question aims to assess the transparency of the company’s supply chain reporting. Therefore, all the information presented here must be available in the public domain, and preferably referenced through a web link.

Spend analysis refers to a full assessment of the supply chain, including information on each supplier. A typical spend analysis would include number of suppliers, category type, spend value and geographic spread. Please bear in mind that this analysis refers to the structure of the supply chain as a whole and does not specifically focus on environmental, social and governance (ESG) assessments of the supply chain.

Disclosure of risk awareness refers to disclosures around the definition and identification of critical tier-1 and non-tier 1 suppliers.

Disclosure of risk assessment and corrective actions refers to measures taken to identify and mitigate identified risks, such as the approach to supplier assessments, monitoring and corrective action plans.

Examples of KPIs relating to supply chain management include (but are not limited to): percentage of assessed suppliers, percentage of audited suppliers, KPIs related to the outcome of capacity-building activities, percentage of suppliers with contract clauses, percentage of suppliers with ISO14001 (or similar), percentage of procurement...
spent with preferred suppliers (according to sustainability criteria), number of suppliers rejected for sustainability reasons, scope 3 missions, suppliers' water use, percentage of procurement staff trained on sustainability aspects.

For each KPI reported, we also request details of targets and progress made towards meeting those targets.
3.7 Tax Strategy

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

3.7.1 Tax Strategy

**Public: this question requires publicly available information.**

**Assessment Focus**

**Question Rationale**

Often, tax avoidance strategies are drawn up in a legally sound way. Therefore, just having a general statement in the financial report which states that the company intends to comply with all tax laws and regulations in its countries of operations is not sufficient. According to KPMG “every company should be in a position to give a coherent justification of their approach to key tax issues such as the use of tax minimization techniques, which is consistent with their approach to other CSR issues.” The adoption of a formal tax policy serves to guide company practices and provide investors, regulators and other external stakeholders with an idea of the company’s tax risk profile, against which practices and disclosures can be compared. An effective policy should be overseen by the board of directors, created in conjunction with relevant senior management, and regularly reviewed to ensure emerging risks are addressed.

This question seeks to determine if there is a clear and transparent tax policy or strategy available in the public domain that addresses sensitive or high-risk tax issues. The question does not seek to assess the company’s approach to the topics listed above, but merely the transparency of the company’s approach to tax.

**Question Layout**

Does your company have a **publicly available** tax policy/principles/strategy in place that indicates your approach towards taxation? Please provide the relevant weblink

- A commitment to compliance with the spirit as well as the letter of the tax laws and regulations in the countries in which the company operates
- A commitment not to transfer value created to low tax jurisdictions
- The use of tax structures intended for tax avoidance
- The company's approach to transfer pricing
- The use of secrecy jurisdictions or so-called "tax havens"

**Data Requirements**

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

Public: This question requires publicly available information.

Assessment Focus

Question Rationale

While companies may use tax optimization strategies in order to optimize their cost structure, they should be transparent about the amount of tax they pay in the countries or regions in which they operate. At the very least, companies should report on their revenues and operating profits on a country-by-country basis or at a regional level. Ideally, they should be equally transparent about the corresponding taxes that they pay. Companies should also be transparent about why taxes paid in one country or region might differ from the expected tax rate – this kind of information can help investors better understand the company’s tax structure.

In this question, we aim to identify to what extent companies report their revenues, operating profits and taxes in the countries or regions they operate in and whether or not differences in expected tax rates are publicly explained.

Question Layout

Does your company publicly report on key business, financial and tax information for the regions or countries in which you operate? Please provide a web link to where this information can be found. If your company public reports both country and regional data, please answer at the country level.

[Single choice between region and country level]

- Yes, we publicly report the following for the main geographic regions we operate in:
  - Revenue
  - Operating profit
  - Taxes paid

- Yes, we publicly report the following for the main countries we operate in:
  - Revenue
  - Operating profit
  - Taxes paid

Question-Specific Guidance & Definitions

Operating Profit Please note that the option for operating profit (otherwise known as EBIT) can be ticked if your company is reporting the following on a country-by-country basis:

- EBT: also called pre-tax profit/operating profit after interest expense
- pre-tax income can also be accepted for operating profit

Taxes Paid The question is seeking to find out if your company reports corporate income taxes on a country-by-country or regional basis. Consolidated taxes that include other items such as value added tax, regional or industry-specific taxes are not accepted.

Please note: To receive credit for country-by-country reporting, we expect distinct disclosure for each country that comprises 10% or more of your company’s revenues. If your company reports taxes at both the country- and regional-level, please provide data at the country level.

Please note: if your company receives more than 90% of its revenues from one country and reports any of the indicators in this question for this country, we accept country by country reporting.

References

GRI Standard 201-1 is relevant for this question.
3.7.3 Effective Tax Rate

Public: This question requires publicly available information.

Assessment Focus

Question Rationale

This question aims to assess whether a company’s tax rate may be unsustainable in a global context, based on the reported tax rate and cash tax rate for the last two years. Governments around the world have been increasingly critical of base erosion and profit shifting (BEPS) which enables tax avoidance through the exploitation of gaps and mismatches in tax rules, allowing companies to shift profits to low or no-tax jurisdictions. Some of the resulting corporate structures and agreements with local governments may be drawn up in a legally sound way, while others may not, even if they may currently appear so. Long-term financial risks can also develop from arrangements that are later determined to be eroding tax base of other countries or provide an unfair subsidy. These arrangements may be deemed illegal, and fines and penalties imposed, or new regulations may be implemented which raise the tax obligation of companies. At the same time regulatory bodies are increasing the enforcement of existing rules. The OECD commenced the BEPS project in 2015 to address these issues and the EU has been aggressive in targeting companies and countries that it believes have illegal agreements, for example those in violation of state aid rules. More recently, the European Commission announced in March 2018 that it has proposed: 1) to reform corporate tax rules so that profits are registered and taxed where businesses have significant interaction with users through digital channels; and 2) an interim tax on certain revenues from digital activities. We expect this type of cooperation and regulation to continue, targeting companies and countries with low tax rates, and removing the loopholes and agreements that allow companies to operate with relatively low rates in the long term. In addition to the regulatory developments listed above, consumers (and voters) are becoming increasingly aware of companies that pursue aggressive tax strategies as recent controversies around several major multinational companies have shown. Therefore, both reputationally and politically, there are growing risks of a mean reversion or even financial penalties associated with these practices.

Question Layout

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

Reference Link

<table>
<thead>
<tr>
<th></th>
<th>2017</th>
<th>2018</th>
<th>Calculated Average</th>
</tr>
</thead>
<tbody>
<tr>
<td>Earnings before Tax</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reported Taxes</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reported Tax Rate</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cash Taxes Paid</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cash Tax Rate</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

If the calculated average tax rate and/or cash tax rate is lower than otherwise expected by a stakeholder reviewing your financial statements and the financial statements of other companies in your sector, please specify the reason why, indicate the tax amount per item and provide explanations in the table below. Please also indicate where this information is available in your public reporting or corporate website.

Reference Link

<table>
<thead>
<tr>
<th>Reason</th>
<th>Tax Impact FY 2017</th>
<th>Tax Impact FY 2018</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Group-wide net operating losses</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non-recurring (one-time) operating losses in own operations</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Net operating losses from acquired companies</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Single jurisdiction tax code (e.g., low domestic rate and maximum 10% sales abroad)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Timing – Issues outside of the two-year period reported</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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Question-Specific Guidance & Definitions

**Tax rate** The percentage at which an individual or a corporation is taxed.

**Reported taxes** The amount of taxes imposed to an organization as this is reported on the income statement.

**Cash taxes** The amount of taxes paid to governmental authorities as this is indicated on the cash flow statement.

**Tax amount** (refer to the low tax explanation table above) if the taxes reported or paid in cash are lower than expected, companies may have non-recurring items (e.g. net operating losses from acquired companies, major write-offs that cause temporary losses, tax settlements, etc.) that explain the low rate. The tax amount entered into the table is the amount of tax that should be added back to the reported or cash tax amounts actually reported, leading to the higher reported tax rate or cash tax rate.

**Reason for Low Tax Rates:**

**Group-wide net operating losses:** “Net operating losses (NOL) are a tax credit created when a company’s expenses exceed its revenues, generating negative taxable income as computed for tax purposes. NOL can be used to offset positive taxable income, reducing cash taxes payable. NOL can be carried back 2 years to recover past taxes paid, and forward 20 years to offset taxable income in future periods. After 20 years, any remaining NOL expire and are no longer available for use. NOL carried forward are recorded on the balance sheet as deferred tax assets (DTA).” Source: Macabacus

In cases where a company has group-wide losses, there is no associated amount, since there is no income.

**Non-recurring (one-time) losses in own operations:** Non-recurring (one-time) losses are irregular or infrequent losses (e.g. write-off of a large investment, a large settlement, or fine) that offset ongoing income generated.

**Net operating losses from acquired companies:** This option refers to “taxable acquisitions in which the acquired net assets are stepped-up for tax purposes, the target’s net operating losses (NOL) may generally be used immediately by the acquirer to offset the gain on the actual or deemed asset sale.” Source: Macabacus

**Single jurisdiction tax code (e.g. low domestic rate and maximum 10% sales abroad):** Certain countries (e.g. Ireland) have a low tax rate for companies. Therefore, certain countries will have a lower tax rate than the average in the industry. If your company has more than 90% of sales domestically, this option can be ticked.

**Timing – Issues outside of the two-year period:** This option refers to an event that happened outside of the two years and was carried forward to the last two fiscal years. These could be losses from a company’s own operations as described above.

Data requirements:

**Earnings before tax (EBT)** may also be known as Operating Income before Tax or Profit before Tax and is often a unique line item on the income statement. Two years of data are required.

Please see the Average Effective Tax Rate & Cash Tax Rate for each of the 24 GICS® Industry Groups, on page 60 of the SAM CSA Companion. While in 2018, the initial thresholds were calculated on the basis of company-reported information gathered using Bloomberg, the thresholds for the 2020 scoring were created using 2018 data, whilst the 2019 data is analysed for next years thresholds. In order to establish these industry group-specific thresholds, we’ve updated our original, Bloomberg-based research on the basis of the data we collected via the 2018 Corporate Sustainability Assessment. We took each company’s average effective tax rate, and cash tax rate, respectively, and averaged over all the rates reported for that industry group worldwide.

**Public disclosure requirements:**
Public disclosure of the following items for the last two fiscal years:
- Earnings before tax
- Reported taxes
- Reported tax rate
- Cash taxes paid
- Cash tax rate

As stated in the question text: completion of the second table of the question is not required; however if it is completed, we expect supporting evidence in the public domain.

If any of the following items have been selected, then these should be reported publicly, as well as the corresponding tax impact (if relevant for the selected option):
- Group-wide net operating losses
- Non-recurring (one-time) operating losses in own operations
- Net operating losses from acquired companies
- Single jurisdiction tax code (e.g. low domestic rate and maximum 10% sales abroad)
- Timing - issues outside of the two-year period reported

References:

- Average Effective Tax Rate & Cash Tax Rate for each of the 24 GICS® Industry Groups, please see the SAM CSA Companion, page 60
- Organization for Economic Co-operation and Development (OECD) framework “Base Erosion and Profit Shifting (BEPS)”
- Macabacus: http://macabacus.com/taxes/net-operating-loss
## Average Effective Tax Rate & Cash Tax Rate for each of the 24 GICS® Industry Groups

<table>
<thead>
<tr>
<th>GICS® Industry Groups</th>
<th>Our Industries</th>
<th>Average Effective Tax Rate</th>
<th>Average Cash Tax Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Automobiles &amp; Components</td>
<td>ATX Auto Components</td>
<td>23.96%</td>
<td>24.18%</td>
</tr>
<tr>
<td></td>
<td>AUT Automobiles</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Consumer Durables &amp; Apparel</td>
<td>DHP Household Durables</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>HOM Homebuilding</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>LEG Leisure Equipment &amp; Products &amp; Consumer Electronics</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>TEX Textiles, Apparel &amp; Luxury Goods</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Consumer Services</td>
<td>CNO Casinos &amp; Gaming</td>
<td>23.27%</td>
<td>21.60%</td>
</tr>
<tr>
<td></td>
<td>CSV Diversified Consumer Services</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>REX Restaurants &amp; Leisure Facilities</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>TRT Hotels, Resorts &amp; Cruise Lines</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Media</td>
<td>PUB Media</td>
<td>21.04%</td>
<td>27.24%</td>
</tr>
<tr>
<td>Retailing</td>
<td>RTS Retailing</td>
<td>30.71%</td>
<td>30.26%</td>
</tr>
<tr>
<td>Food &amp; Staples Retailing</td>
<td>FDR Food &amp; Staples Retailing</td>
<td>26.27%</td>
<td>26.60%</td>
</tr>
<tr>
<td>Food, Beverage &amp; Tobacco</td>
<td>BVG Beverages</td>
<td>23.18%</td>
<td>22.97%</td>
</tr>
<tr>
<td></td>
<td>FOA Food Products</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>TOB Tobacco</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Household &amp; Personal Products</td>
<td>COS Personal Products</td>
<td>26.09%</td>
<td>28.00%</td>
</tr>
<tr>
<td></td>
<td>HOU Household Products</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Energy</td>
<td>COL Coal &amp; Consumable Fuels</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>OGR Oil &amp; Gas Refining &amp; Marketing</td>
<td>22.86%</td>
<td>17.19%</td>
</tr>
<tr>
<td></td>
<td>OGX Oil &amp; Gas Upstream &amp; Integrated</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>OIE Energy Equipment &amp; Services</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>PIP Oil &amp; Gas Storage &amp; Transportation</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Banks</td>
<td>BNK Banks</td>
<td>25.82%</td>
<td>21.28%</td>
</tr>
<tr>
<td>Diversified Financials</td>
<td>FBN Diversified Financial Services and Capital Markets</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Insurance</td>
<td>INS Insurance</td>
<td>21.10%</td>
<td>24.66%</td>
</tr>
<tr>
<td>Health Care Equipment &amp; Services</td>
<td>HEA Health Care Providers &amp; Services</td>
<td>22.57%</td>
<td>22.32%</td>
</tr>
<tr>
<td></td>
<td>MTC Health Care Equipment &amp; Supplies</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pharmaceuticals, Biotechnology &amp; Life Sciences</td>
<td>BTC Biotechnology</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>DRG Pharmaceuticals</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>LIF Life Sciences Tools &amp; Services</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Capital Goods</td>
<td>ARO Aerospace &amp; Defense</td>
<td>30.30%</td>
<td>30.70%</td>
</tr>
<tr>
<td></td>
<td>BLD Building Products</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>CON Construction &amp; Engineering</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>ELQ Electrical Components &amp; Equipment</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>IDD Industrial Conglomerates</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>IEQ Machinery and Electrical Equipment</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>TCD Trading Companies &amp; Distributors</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Category</td>
<td>Subcategory</td>
<td>2023 Percentage</td>
<td>2022 Percentage</td>
</tr>
<tr>
<td>----------------------------------</td>
<td>--------------------------------------------------</td>
<td>-----------------</td>
<td>-----------------</td>
</tr>
<tr>
<td>Commercial &amp; Professional Services</td>
<td>ICS Commercial Services &amp; Supplies</td>
<td>31.00%</td>
<td>26.20%</td>
</tr>
<tr>
<td></td>
<td>PRO Professional Services</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transportation</td>
<td>AIR Airlines</td>
<td>31.10%</td>
<td>24.60%</td>
</tr>
<tr>
<td></td>
<td>TRA Transportation and Transportation Infrastructure</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Semiconductors &amp; Semiconductor Equipment</td>
<td>SEM Semiconductors &amp; Semiconductor Equipment</td>
<td>15.26%</td>
<td>14.12%</td>
</tr>
<tr>
<td>Software &amp; Services</td>
<td>IMS Interactive Media</td>
<td>27.82%</td>
<td>24.18%</td>
</tr>
<tr>
<td></td>
<td>SOF Software</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>TSV IT services &amp; Internet Software and Services</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Technology Hardware &amp; Equipment</td>
<td>CMT Communications Equipment</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>ITC Electronic Equipment, Instruments &amp; Components</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>THQ Computers &amp; Peripherals and Office Electronics</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Materials</td>
<td>ALU Aluminum</td>
<td>22.31%</td>
<td>20.82%</td>
</tr>
<tr>
<td></td>
<td>CHM Chemicals</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>COM Construction Materials</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>CTR Containers &amp; Packaging</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>FRP Paper &amp; Forest Products</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>MNX Metals &amp; Mining</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>STL Steel</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Real Estate</td>
<td>REA Real Estate</td>
<td>21.30%</td>
<td>18.90%</td>
</tr>
<tr>
<td>Telecommunication Services</td>
<td>TLS Telecommunication Services</td>
<td>22.36%</td>
<td>23.14%</td>
</tr>
<tr>
<td>Utilities</td>
<td>ELC Electric Utilities</td>
<td>20.40%</td>
<td>15.50%</td>
</tr>
<tr>
<td></td>
<td>GAS Gas Utilities</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>MUW Multi and Water Utilities</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
3.8 Information Security/Cybersecurity and IT System Availability

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

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

PLEASE NOTE: The question texts and methodology presented may be subject to change at any time before end of March, 2020. In addition, questions might look different in the Online Assessment Tool in terms of question structure and layout.
3.8.1 Information Security/Cybersecurity Governance

Assessment Focus

Question Rationale

Due to the current trend of digitization, including but not limited to cloud computing, online marketplaces and payments etc., it is crucial that access to network, IT systems and data is assured at all times. As a result, lower than agreed upon system performance or service disruptions can result in higher costs and reputational risk for companies. The main risks stem from technical failure, human error, malicious attacks, weather events; natural disasters or terrorist attacks. Managing such risks, including contingency plans, is crucial to ensuring business continuity.

Over the past decade, the number of information security breaches has grown exponentially with some attacks reaching unprecedented scale and the cyber threat landscape continues to grow and evolve, abusing existing and new technologies and exploiting vulnerable users. These incidents and the related costs have shown that information security/cybersecurity has become a financially material issue which must be diligently managed to protect corporate value. The costs of cyberattack are manifold and can impact the company in different ways. Internal costs are operational costs and relate to dealing with cybercrime and incidence prevention. External costs include the consequences of the cyber-attack such as the loss or theft of sensitive information, operations’ disruption, fines and penalties, infrastructure damage or revenue losses due to loss of customers. Thus, ensuring the security and resilience of networks and information systems is critical.

All boards should have the ability to understand cyber threats and assess management’s capability of dealing with Cyber-related issues according to the National Association of Corporate Directors (NACD). However also senior executives, like CISO, CSO or CIO, must have the necessary leadership, operational and strategic skills to understand and face the risk. A cyber-risk committee would have the role to encourage both the board and executives to give cyber-security issues a high priority and to prioritize them with strong oversight.

The question focuses on whether the company has the appropriate governance to prevent IT system failures and major information security / cybersecurity incidents.

Question Layout

- Yes, we have either a director on the board with relevant background in IT engaged on the cybersecurity strategy process and/or someone in the Executive Management team who oversees the company’s cybersecurity strategy:
  - **Board Responsibility** Please indicate the Board member who oversees Cybersecurity strategy together with his/her experience and indicate this person’s membership in the Committee responsible for the oversight of Cybersecurity (if any).

<table>
<thead>
<tr>
<th>Board member who oversees Cybersecurity strategy</th>
<th>Please indicate name, position and experience</th>
<th>Please indicate the Board member’s membership in the committee which oversees cyber security strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>3 Text Box (1000 chars)</td>
<td>Text Box (1000 chars)</td>
<td></td>
</tr>
<tr>
<td>• Name</td>
<td>• Cybersecurity committee</td>
<td></td>
</tr>
<tr>
<td>• Experience</td>
<td>• Risk committee</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Audit committee</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• None</td>
<td></td>
</tr>
</tbody>
</table>

- **Executive Management Responsibility** Which role or function in the Executive Management Team is responsible for overseeing Cybersecurity in the company:
  - CISO (Chief Info Security Officer) / CSO (Chief Security Officer)
  - Another function in the executive team (CTO and CIo)
  - We don’t have anyone who oversees Cybersecurity in the Executive Management team

- No, the Board of directors is not engaged in the oversight of cybersecurity strategy nor we do not have a person with dedicated operational responsibility for Cybersecurity.
- Not applicable. Please provide explanations in the comment box below.
- Not known

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Question-Specific Guidance & Definitions

**IT security** IT security is the process of implementing measures and systems designed to securely protect and safeguard information utilizing various forms of technology. IT security is thus considered a bit broader than cybersecurity.

**Information System Applications**, services, information technology assets, or other information handling components (according to ISO).

**Cybersecurity** Cybersecurity is the body of technologies, processes and practices designed to protect networks, systems, computers, programs and data from attack, damage or unauthorized access (according to SEC).

**Information security** The protection of information and information systems from unauthorized access, use, disclosure, disruption, modification, or destruction in order to provide confidentiality, integrity, and availability (according to NIST).

**CISO** A chief information security officer (CISO) is the senior-level executive within an organization responsible for establishing and maintaining the enterprise vision, strategy, and program to ensure information assets and technologies are adequately protected. The chief information security officer (CISO), or alternatively the Chief Information Officer (CIO), is the highest-ranking cybersecurity executive and is responsible for establishing and maintaining the enterprise strategy and processes that protect information assets.

**CSO** A Chief Security Officer (CSO) is the employee responsible for the physical security of a company, including its communication and business systems. The job of a CSO is to protect people, assets, infrastructure and technology.

**Experience** Relevant experience could be past experience in implementation of IT, information security or cybersecurity or operational responsibility for IT as a senior executive of a company.

In addition, for Board Member - non-technical experience as a senior executive of an IT company (such as SVP Marketing, Sales etc.) is not valid. Academic experience in IT is not considered relevant.

**Important note:** Throughout the whole criterion we always refer to IT security, cybersecurity or information security according to the definitions above. For the appraisal of the criterion we will treat “IT security”, “information security” and “cybersecurity” equally.

References

GRI 102-19 and GRI 102-20 are relevant for this question.
3.8.2 Security Measures

Supporting evidence is required for parts of this question.

Assessment Focus

Question Rationale

Due to the current trend of digitization, including but not limited to cloud computing, online marketplaces and payments, etc., it is crucial that access to network, IT systems and data is assured at all times. As a result, lower than agreed upon system performance or service disruptions can result in higher costs and reputational risk for companies. The main risks stem from technical failure, human error, malicious attacks, weather events, natural disasters or terrorist attacks. Managing such risks, including contingency plans, is crucial to ensuring business continuity.

Over the past decade, the number of information security breaches has grown exponentially with some attacks reaching unprecedented scale and the cyber threat landscape continues to grow and evolve, abusing existing and new technologies and exploiting vulnerable users.

These incidents and the related costs have shown that information security/cybersecurity has become a financially material issue which must be diligently managed to protect corporate value. The costs of cyberattack are manifold and can impact the company in different ways. Internal costs are operational costs and relate to dealing with cybercrime and incidence prevention. External costs include the consequences of the cyber-attack such as the loss or theft of sensitive information, operations’ disruption, fines and penalties, infrastructure damage or revenue losses due to loss of customers. Thus, ensuring the security and resilience of networks and information systems is critical.

The question assesses what security measures are in place to ensure employees are aware of threat issues and the importance of information security/cybersecurity.

Question Layout

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

- Yes, we have implemented policies and procedures for all employees
  - An information security/cybersecurity policy is internally available to all employees. Please provide the relevant document:
    - Reference: __________
    - Text box: __________
  - Information security/cybersecurity awareness training. Please explain and provide supporting evidence:
    - Reference: __________
    - Text box: __________
  - A clear escalation process which employees can follow in the event an employee notices something suspicious is in place. Please explain and provide supporting evidence:
    - Reference: __________
    - Text box: __________
  - Information security/cybersecurity is part of the employee performance evaluation (e.g. disciplinary actions). Please explain and provide supporting evidence:
    - Reference: __________
    - Text box: __________
- No, we have not implemented policies and procedures for employees with access to critical information.
- Not applicable. Please provide explanations in the comment box below.
- Not known

Question-Specific Guidance & Definitions

**IT security** IT security is the process of implementing measures and systems designed to securely protect and safeguard information utilizing various forms of technology. IT security is thus considered a bit broader than cybersecurity.

**Information System** Applications, services, information technology assets, or other information handling components (according to ISO). Cybersecurity: Cybersecurity is the body of technologies, processes and practices designed to protect networks, systems, computers, programs and data from attack, damage or unauthorized access (according to ISO).

Information security The protection of information and information systems from unauthorized access, use, disclosure, disruption, modification, or destruction in order to provide confidentiality, integrity, and availability (according to NIST).

CISO A chief information security officer (CISO) is the senior-level executive within an organization responsible for establishing and maintaining the enterprise vision, strategy, and program to ensure information assets and technologies are adequately protected. The chief information security officer (CISO), or alternatively the Chief Information Officer (CIO), is the highest ranking cyber security executive and is responsible for establishing and maintaining the enterprise strategy and processes that protect information assets.
CSO A Chief Security Officer (CSO) is the employee responsible for the physical security of a company, including its communication and business systems. The job of a CSO is to protect people, assets, infrastructure and technology.

Experience Relevant experience could be past experience in implementation of IT, information security or cybersecurity or operational responsibility for IT as a senior executive of a company.

In addition, for Board Member - non-technical experience as a senior executive of an IT company (such as SVP Marketing, Sales etc.) is not valid. Academic experience in IT is not considered relevant.

Important note: Throughout the whole criterion we always refer to IT security, cybersecurity or information security according to the definitions above. For the appraisal of the criterion we will treat “IT security”, “information security” and “cybersecurity” equally.

References
GRI 102-20 is relevant for this question.
3.8.3 Process and Infrastructure

**Supporting evidence is required for parts of this question.**

**Assessment Focus**

![Folder and Briefcase icons]

**Question Rationale**

Due to the current trend of digitization, including but not limited to cloud computing, online marketplaces and payments, etc., it is crucial that access to network, IT systems and data is assured at all times. As a result, lower than agreed upon system performance or service disruptions can result in higher costs and reputational risk for companies. The main risks stem from technical failure, human error, malicious attacks, weather events, natural disasters or terrorist attacks. Managing such risks, including contingency plans, is crucial to ensuring business continuity.

Over the past decade, the number of information security breaches has grown exponentially with some attacks reaching unprecedented scale and the cyber threat landscape continues to grow and evolve, abusing existing and new technologies and exploiting vulnerable users. These incidents and the related costs have shown that information security/cybersecurity has become a financially material issue which must be diligently managed to protect corporate value. The costs of cyberattacks are manifold and can impact the company in different ways. Internal costs are operational costs and relate to dealing with cybercrime and incidence prevention. External costs include the consequences of the cyber-attack such as the loss or theft of sensitive information, operations' disruption, fines and penalties, infrastructure damage or revenue losses due to loss of customers. Thus, ensuring the security and resilience of networks and information systems is critical.

The question focuses on how well companies are prepared to prevent major IT infrastructure and information security/cybersecurity incidents and if they can react appropriately in the event of such events.

**Question Layout**

- Incident response
  - Do you have business continuity / contingency plans and incident response procedures in place and how often do you test them? Please provide supporting evidence.
  - Attach reference
    - Yes, and we test them at least semi-annually
    - Yes, and we test them at least annually
    - Yes, but frequency is not specified
    - No, we do not have such plans and procedures in place

**Certification**

- Is your IT infrastructure and information security management system certified to ISO 27001, NIST or similar?
  - Yes, the following percentage of our IT infrastructure has been certified: ________
  - No, our IT infrastructure has not been certified.

**External verification**

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

**Vulnerability Analysis**

- We do vulnerability analysis including simulated hacker attacks.
- We do not have processes and infrastructure in place to prevent and/or respond to cyberattacks.
- Not applicable. Please provide explanations in the comment box below.
- Not known

**Question-Specific Guidance & Definitions**

**IT security** IT security is the process of implementing measures and systems designed to securely protect and safeguard information utilizing various forms of technology. IT security is thus considered a bit broader than cybersecurity.

**Information System** Applications, services, information technology assets, or other information handling components (Source: ISO).

**Cybersecurity** Cybersecurity is the body of technologies, processes and practices designed to protect networks, systems, computers, programs and data from attack, damage or unauthorized access (Source: SEC).

**Information security** The protection of information and information systems from unauthorized access, use, disclosure, disruption, modification, or destruction in order to provide confidentiality, integrity, and availability (Source: NIST).

**Vulnerability Analysis (aka Vulnerability Assessment aka VA)** A vulnerability analysis is the process of defining, identifying, classifying and prioritizing vulnerabilities in...
computer systems, applications and network infrastructures and providing the organization doing the assessment with the necessary knowledge, awareness and risk background to understand the threats to its environment and react appropriately (Source: ISACA)

**Simulated Hacker Attacks or Penetration (aka Pen.) Test**
A simulated hacker attack or penetration test is the manual process where an ethical hacker conducts an assessment on a target to uncover vulnerabilities by exploiting them. The goal is to gain unauthorized access through exploitation which can be used to emulate the intent of a malicious hacker. This may be included as a part of the Vulnerability Assessment.

Important note: Throughout the whole criterion we always refer to IT security, cybersecurity or information security according to the definitions above. For the appraisal of the criterion, we will treat “IT security”, “information security” and “cybersecurity” equally.

**Data Requirements**
The registrant may choose to describe the degree to which its management approach is aligned with an external standard or framework for managing data security such as:

- *Framework for Improving Critical Infrastructure Cybersecurity, Version 1.0,* February 12, 2014, National Institute of Standards and Technology (NIST)
3.8.4 Information Security/Cybersecurity Breaches

Assessment Focus

Question Rationale
Over the past decade, the number of information security breaches has been growing exponentially. The many incidents and the related costs have shown that information security/cybersecurity has become a financially material issue which has to be diligently managed to protect corporate value. The question focuses on whether companies experienced information security/ cybersecurity incidents in the past three fiscal years.

Question Layout
- We collect data on information/cybersecurity breaches and incidents.
  - Currency: ________

Incidents & Breaches
Has your company experienced breaches of information security or other cybersecurity incidents over the past three years? Please note that if you did not have any information breaches, fines or accrued liability in an individual year, 0 should be entered in the corresponding box in the table. If you do not know the information, please leave the box empty. See the information text for more information.

<table>
<thead>
<tr>
<th>Total number of information security breaches or other cybersecurity incidents</th>
<th>2017</th>
<th>2018</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of information security breaches involving customers’ personally identifiable information</td>
<td>Numerical</td>
<td>Numerical</td>
<td>Numerical</td>
</tr>
<tr>
<td>Number of customers affected by company’s data breaches</td>
<td>Numerical</td>
<td>Numerical</td>
<td>Numerical</td>
</tr>
<tr>
<td>Total amount of fines/penalties paid in relation to information security breaches or other cybersecurity incidents</td>
<td>Numerical</td>
<td>Numerical</td>
<td>Numerical</td>
</tr>
</tbody>
</table>

Insurance Against Breaches
Do you have insurance cover for information security breaches or other cybersecurity incidents?
- Yes, we have an insurance policy with a maximum coverage of: ________
- No, we do not have insurance coverage
- We do not collect data on information security/cybersecurity breaches and incidents.
- Not applicable. Please provide explanations in the comment box below
- Not known

Question-Specific Guidance & Definitions
The following definitions are based on the definitions from SASB and NIST:

Information security breaches These are defined as instances of unauthorized acquisition, access, use, or disclosure of protected information.

The number of information security breaches This should include information on security breaches, cybersecurity risks, and incidents that resulted in the company’s business processes deviating from its expected outcomes for confidentiality, integrity, and availability. This includes incidents of unauthorized acquisition or acquisition without valid authorization, resulting from people, process, or technology deficiencies or failures. Disruptions of service due to equipment failures should not be included.

Customers’ personally identifiable information This is defined as any information about an individual maintained by an entity, including (1) any information that can be used to distinguish or trace an individual’s identity, such as name, social security number, date and place of birth, mother’s maiden name, or biometric records; and (2) any other information that is linked or linkable to an individual, such as medical, educational, financial, and employment information. Breaches should only be included if customers were notified of the breach, either as required by state law or voluntarily by the company.

Other cybersecurity incidents These are defined as instances where not only unauthorized acquisition, access, use, or disclosure of protected information is involved but where intruders take control over a system such as for example power generation or transportation systems.

Number of customers affected The entity shall disclose the total number of unique customers who were affected by data breaches, which includes all those whose personal data was compromised in a data breach (Accounts that the entity cannot verify as belonging to the same customer shall be disclosed separately).

Fines/Penalties Fines/penalties per year should be those related to the violations that occurred that year. In other words, if a violation occurred in 2011, but the fine was levied in 2012 and paid in 2013, both the violation and the
fine should be included only in the 2011 column. Similarly, if an incident occurred in 1990 and the penalty was finalized and paid in 2014, the penalty does not need to be reported.

**Number of customers affected** The entity shall disclose (3) the total number of unique customers who were affected by data breaches, which includes all those whose personal data was compromised in a data breach (Accounts that the entity cannot verify as belonging to the same customer shall be disclosed separately) (SASB)

The total number of unique customers who were impacted by data breaches, which including those whose personal data was compromised as a result of the breach. (Accounts that the entity cannot verify as belonging to the same customer shall be disclosed separately) (SASB)
4. Environmental Dimension

4.1 Operational Eco-Efficiency

Reducing the overall environmental footprint of companies in both the manufacturing and service industries is crucial, as the risks of financial and reputational costs linked to environmental litigation are increasing. Producing more with less material is essential for many industries affected by the increasing scarcity of natural resources. For all industries, minimizing the consumption of natural resources and waste-generating activities can reduce costs and, in some cases, lead to new business opportunities. The key focus of this criterion is on the inputs and outputs of business operations. It assesses trends in the consumption of natural resources and the production of waste products specific to each industry.

Only the five general questions applicable to all industries are covered in this chapter. Additional industry-specific questions exist to capture environmental indicators specific to different industries.

We assess the relative improvement of a company’s operational eco-efficiency over time by normalizing absolute environmental data (such as greenhouse gas emissions) relative to a denominator value that can vary according to the industry. Some examples of denominators used include revenues, production volume, square meters, and FTEs. Although absolute emission or waste production figures may increase over time as a company grows or becomes more profitable, we expect that the relative efficiency of the company should improve over time.

The section on denominators does not cover all variations of the questions, but it is used to illustrate the purpose of the question. Please note that for industry-specific denominators the guidance in the questionnaire should be followed whenever it differs from the general description in this document.

The following guidance applies to all environmental performance data: Environmental performance data should cover the activities of the entire company, should be consolidated in the same way as in financial reporting, and must refer to the same financial year and be aligned with the figures reported in the denominator question. If the figures provided do not cover the entire company, the coverage fields should be used to adjust the percentage of the company represented by the provided data. The coverage should be in line with the denominator provided (i.e. revenues, FTEs, production volume, etc.)

Environmental performance data should only cover direct emissions and resource use; that is, resources used and emissions caused by the company and its consolidated activities. Emissions and resources used by suppliers and customers should be excluded. The particular environmental data of group companies should follow the following rules:

- Only the questions applicable to all or most industries are covered in this chapter. Additional industry-specific questions exist to capture environmental indicators specific to different industries, dated at-equity must not be considered.
- Environmental data of companies that are consolidated proportionally must be considered according to the proportion at which they are consolidated financially.
- Environmental data of companies that are fully consolidated must be fully considered irrespective of the proportion to which they belong to the group.
- Environmental data should refer to the specific company structure of each particular year. There should be no pro-forma backward consolidation of the current company structure.
- Environmental data of companies that have been sold or no longer consolidated should be excluded from environmental data as of the reporting period from which the company was no longer consolidated.
- Environmental data of companies that have been bought should only be included as of the reporting period from which the company was consolidated financially for the first time.
- Where environmental data do not cover all consolidated activities of the company, the scope (coverage) should be indicated, together with the environmental data that are known.
- For indicators for which a company has no emissions or does not use any resources, you should fill in 0.
- Where the reported environmental data deviate from these definitions you are asked to explain in what way the data provided differ from the definitions.
- If a company publicly reports on long-term but not annual targets, an annual target can be estimated based on internal targets or a linear interpolation.
- The data must be provided in the unit indicated in the question. If the company tracks an indicator in a different unit, the unit converter must be used to convert the data into the required unit.
4.1.1 EP – Direct Greenhouse Gas Emissions (Scope 1)

**Assessment Focus**

- **Question Rationale**: Producing more with less material is essential for many industries affected by the increasing scarcity of natural resources. Operational Eco-Efficiency can enhance companies’ competitiveness through reduced costs and environmental liabilities. It can also mean companies are better prepared for future environmental regulations.

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

<table>
<thead>
<tr>
<th>Direct GHG (Scope 1)</th>
<th>Unit</th>
<th>FY 2015</th>
<th>FY 2016</th>
<th>FY 2017</th>
<th>FY 2018</th>
<th>What was your target for FY 2018?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total direct GHG emissions (Scope 1)</td>
<td>metric tons of CO2 equivalents</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Data coverage (as % of denominator)</td>
<td>percentage of:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**PUBLIC REPORTING**

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

**THIRD-PARTY VERIFICATION**

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

**DATA CONSISTENCY**

- We report publicly on this information, but the data in the table above differ from our publicly reported figures. Please provide an explanation for this difference in the comment box: ___
- We have a temporary coverage reduction or target challenge due to corporate actions. Please briefly explain if a merger, acquisition, divestment, etc. has temporarily caused a reduction in your ability to report optimal coverage or caused your target to appear abnormal: ___
- We are not able to report this information in absolute terms; the information provided in the table above is normalized data. For the purpose of this question, please always provide absolute figures if available.
- We only report on combined Scope 1 & Scope 2 emissions. Please provide the combined figures in the table above and mark “Not Applicable” in the next question (EP – Indirect Greenhouse Gas Emissions (Scope 2)).

**Question-Specific Guidance & Definitions**

For general guidance related to environmental performance data, please refer to the general guidance at the beginning of the criterion.

**GHG scope 1**: Greenhouse gas emissions (GHGs) refers to emissions of the six main GHGs that are covered by the Kyoto Protocol. These gases are outlined below. Each GHG has a different capacity to cause global warming, depending on its radiative properties, its molecular weight and its lifespan in the atmosphere.

Greenhouse gases covered by the Kyoto Protocol:

- **Carbon Dioxide – CO2**: Emitted from the burning of fossil fuels, carbon dioxide accounted for some 86 percent of the UK’s human induced GHG emissions in 2003.
- **Methane – CH4**: Emitted mainly from agriculture, waste disposal, leakage from the gas distribution system and coal mining, methane contributed to over 6 percent of UK anthropogenic GHG emissions in 2003.
- **Nitrous Oxide – N2O**: The main anthropogenic sources of nitrous oxide emissions are agriculture, transport, industrial processes, and coal combustion. Nitrous oxide accounted for approx. 6 percent of UK GHG emissions in 2003.
- **Hydrofluorocarbons – HFCs, Perfluorocarbons – PFCs and Sulphur Hexafluoride – SF6**: Collectively known as “F-gases”, these are emitted mainly from air conditioning and refrigeration and industrial processes.
• **Offsetting:** Only emissions from renewable resources where the emitter can be reasonably confident that greenhouse gas emissions will be naturally offset or neutralized do not need to be reported (Example: wood burning when a company can be reasonably confident that forests will be reforested). Greenhouse gas emissions that have been offset this way need not be reported. This does not include greenhouse gas emissions for which companies are required to be in the possession of CO2 permits. These emissions need to be reported.

**Data requirements**

Specific data requirements for greenhouse gas emissions:
- Greenhouse gas emissions should be reported as metric tons of CO2-equivalents.
- Data on greenhouse gas emissions should only include CO2 and all other greenhouse gas emissions.
- All greenhouse gas emissions emitted directly by the company should be reported.
- Offseting: Only emissions from renewable resources where the emitter can be reasonably confident that greenhouse gas emissions will be naturally offset or neutralized do not need to be reported (Example: wood burning when a company can be reasonably confident that forests will be reforested). Greenhouse gas emissions that have been offset this way need not be reported. This does not include greenhouse gas emissions for which companies are required to be in the possession of CO2 permits. These emissions need to be reported.
- Greenhouse gas emissions of owned and/or managed fleet must be included.
- Greenhouse gas emissions due to commuting of employees should not be included.
- Greenhouse gas emissions of business travel other than by owned and/or operated fleet should not be included.

**Disclosure requirements for partially public question.**

Additional credit will be granted for relevant publicly available evidence covering the following aspect of this question:
Direct Greenhouse Gas Emissions (Scope 1) figure for at least the most recent reported year.

**Third-party verification:** For third-party verification, we expect that data in the most recent year reported has been third-party verified and that relevant documentation is attached showing this verification. Internal audits or verification will not be considered.

**Data consistency:**
- If the environmental performance data reported in the questionnaire do not correspond to the publicly reported figures, the corresponding option should be marked and the discrepancy should be explained. This option should not be indicated if the information is not publicly reported at all.
- If there is a temporary reduction in coverage due to a corporation action, the corresponding box should be marked and the reduction should be explained.
- If it is not possible to report the figures in absolute terms, the data should be reported in relative terms and the corresponding box should be ticked. Please note that information should always be reported in absolute terms if possible, even if it deviates from public reporting. If relative figures are indicated, this need to be done for ALL environmental performance figures and the denominator should be set to 1.
- If GHG emissions are only reported and tracked as combined Scope 1 and Scope 2 emissions, the combined figures should be indicated in this question, the corresponding box should be ticked and the following question, EP – Indirect Greenhouse Gas Emissions (Scope 2), should be marked as Not Applicable.

**General data requirements**

Environmental performance data should cover the activities of the entire company with the same consolidation as used in financial reporting and must refer to the financial year (e.g., 01/01 to 31/12 for both financial and environmental data) and be aligned with the figures reported in the Company Information section.

**Target:** We require the absolute target for the most recent reporting year. If your company has a multiple year and/or relative target, please extrapolate what the target value would have to be for the last financial year to make sure you are progressing well towards achieving the target by the end of the target period.

As a consequence, environmental performance data should only cover the direct emissions/resource use, i.e., resource use emissions caused by the company and its consolidated activities. Emissions and resource use of suppliers and customers should be excluded. In particular, environmental data of group companies should follow the following rules:
- Environmental data of companies that are consolidated at-equity must not be considered.
- Environmental data of companies that are consolidated proportionally must be considered to the proportion at which they are consolidated financially.
- Environmental data of companies that are fully consolidated must be considered irrespective of the proportion to which they belong to the group.
- Environmental data should refer to the specific company structure of each particular year. There should be no pro-forma backward consolidation of the current company structure.
- Environmental data of companies that are sold or no longer consolidated should be excluded from environmental data as of the reporting period in which the company has not been consolidated any more.
- Environmental data of companies that have been bought should only be included as of the reporting period in which the company is consolidated financially for the first time.
- Where environmental data does not cover all consolidated activities of the company, the coverage should be indicated together with the environmental data that is known.
- Indicators where a company has no emissions/resource use, 0 should be filled.
- Where the reported environmental data deviates from these definitions you are asked to explain in what way the data provided differs from the definitions.
- If a company publicly reports on long-term but not annual targets, an annual target has to be estimated based on internal target setting or a linear distribution.
- The data must be provided in the unit indicated in the question. If the company is tracking the specific indicator in a different unit, the unit converter must be used to convert the data into the preferred unit.
- Please ensure that the "Company Information section has been correctly filled in, and that the coverage in the table below is based on the same denominator.

**References**

GRI Standard 305-1 is relevant for this question.
4.1.2 EP – Indirect Greenhouse Gas Emissions (Scope 2)

**Assessment Focus**

Partial public: additional credit will be granted for relevant publicly available evidence.

**Question Rationale**

Producing more with less material is essential for many industries affected by the growing scarcity of natural resources. Operational Eco-Efficiency enhances competitiveness in terms of cost reductions and reduces environmental liabilities. It also enables companies to be better prepared for future environmental regulations.

**Question Layout**

Please provide your company’s indirect greenhouse gas emissions from energy purchased (purchased and consumed, i.e. without energy trading) (IGHG SCOPE 2) for the part of your company’s operations for which you have a reliable and auditable data acquisition and aggregation system. Please refer to the information button for additional clarifications. For each row in the table, it is mandatory that the values provided are in the same unit.

Also, please ensure that you have correctly filled in the Company Information section at the beginning of the questionnaire, and that the coverage in the table below is related to the denominator relevant for your company as indicated in that section.

<table>
<thead>
<tr>
<th>IGHG Scope 2</th>
<th>Unit</th>
<th>FY 2015</th>
<th>FY 2016</th>
<th>FY 2017</th>
<th>FY 2018</th>
<th>What was your target for FY 2018?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Indirect greenhouse gas emissions from energy purchased and consumed (scope 2)</td>
<td>metric tons of CO2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>equivalents</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Data coverage (as % of denominator)</td>
<td>percentage of:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**PUBLIC REPORTING**

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

**THIRD-PARTY VERIFICATION**

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

**DATA CONSISTENCY**

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

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

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

- We measure our indirect greenhouse gas emissions according to the location-based method instead of the market-based method (please refer to the question guidance for further details).

**Question-Specific Guidance & Definitions**

For general guidance related to environmental performance data, please refer to the general guidance at the beginning of the criterion.

**GHG scope 2 Indirect impacts- energy use**

Many companies report on the GHG emissions incurred in the generation of the electricity they consume and for service companies these indirect emissions can be more important than their direct environmental impacts. There are also some ways that companies can mitigate these emissions, for example by paying a renewable tariff or improving energy efficiency.
Data Requirements

Specific Data Requirement for Indirect Greenhouse Gas Emissions (Scope 2):

Greenhouse gas emissions should be reported as metric tons of CO₂-equivalents. Data on greenhouse gas emissions should include CO₂ and all other greenhouse gas emissions weighted according to greenhouse gas potential.

Measuring Scope 2 emissions is recommended to be performed according to the market-based method of the Greenhouse Gas Protocol. However the location-based method is equally accepted, (cf. Greenhouse Gas Protocol Scope 2 Guidance, January 2015)

- **Location-based method**: reflects the average emissions intensity of grids on which energy consumption occurs (using mostly grid-average emission factor data).
- **Market-based method**: reflects emissions from electricity that companies have purposefully chosen (or their lack of choice). It derives emission factors from contractual instruments, which include any type of contract between two parties for the sale and purchase of energy bundled with attributes about the energy generation, or for unbundled attribute claims.

Third-party verification: For third-party verification, we expect that data in the most recent year reported has been third-party verified and that relevant documentation is attached showing this verification. Internal audits or verification will not be considered.

Data consistency:

- If the environmental performance data reported in the questionnaire do not correspond to the publicly reported figures, the corresponding option should be marked and the discrepancy should be explained. This option should not be indicated if the information is not publicly reported at all.
- If there is a temporary reduction in coverage due to a corporation action, the corresponding box should be marked and the reduction should be explained.
- If it is not possible to report the figures in absolute terms, the data should be reported in relative terms and the corresponding box should be ticked. Please note that information should always be reported in absolute terms if possible, even if it deviates from public reporting. If relative figures are indicated, this need to be done for ALL environmental performance figures and the denominator should be set to 1.
- If GHG emissions are only reported and tracked as combined Scope 1 and Scope 2 emissions, the combined figures should be indicated in the previous question (EP- Direct Greenhouse Gas Emissions (Scope 1), the corresponding box should be ticked and this question, should be marked as Not Applicable.
- If the market-based method for accounting for indirect GHG emissions has not been used, figures based on the location-based method should be indicated and the corresponding box should be ticked.

General data requirements: Environmental performance data should cover the activities of the entire company with the same consolidation as used in financial reporting and refer to the financial year (e.g., 01/01 to 31/12 for both financial and environmental data) and be aligned with the figures reported in the Company Information section.

Target: We require the absolute target for the most recent reporting year. If your company has a multiple year and/or relative target, please extrapolate what the target value would have to be for the last financial year to make sure you are progressing well towards achieving the target by the end of the target period. As a consequence, environmental performance data should only cover the indirect emissions/resource use, i.e., resource use/emissions caused by the company and its consolidated activities. Emissions and resource use of suppliers and customers should be excluded. In particular, environmental data of group companies should follow the following rules:

- Environmental data of companies that are consolidated at-equity must not be considered.
- Environmental data of companies that are consolidated proportionally must be considered to the proportion at which they are consolidated financially.
- Environmental data of companies that are fully consolidated must be fully considered irrespective of the proportion to which they belong to the group.
- Environmental data of business travel other than by owned and/or operated fleet should not be included unless specifically asked for.
- Environmental data should refer to the specific company structure of each particular year. There should be no pro-forma backward consolidation of the current company structure.
- Environmental data of companies that are sold or no longer consolidated should be excluded from environmental data as of the reporting period in which the company has not been consolidated any more.
- Environmental data of companies that have been bought should only be included as of the reporting period in which the company is consolidated financially for the first time.
- Where environmental data does not cover all consolidated activities of the company, the scope should be indicated together with the environmental data that is known.
- Indicators where a company has no emissions/resource use, 0 should be filled.
- Where the reported environmental data deviates from these definitions you are asked to explain in what way the data provided differs from the definitions.
- If a company publicly reports on long-term but not annual targets, an annual target has to be estimated based on internal target setting or a linear distribution.
- The data must be provided in the unit indicated in the question. If the company is tracking the specific indicator in a different unit, the unit converter must be used to convert the data into the preferred unit.
- Please ensure that the Company Information section has been correctly filled in, and that the coverage in the table below is based on the same denominator.

Disclosure requirements for partially public question: Additional credit will be granted for relevant publicly available evidence covering the following aspect of this question:

- Indirect Greenhouse Gas Emissions (Scope 2) figure for at least the most recent reported year.

References:

GRI Standard 305-2 is relevant for this question.
4.1.3 EP – Energy

**Partial public: additional credit will be granted for relevant publicly available evidence.**

Please refer to the exact question name on your questionnaire and note: EP – Energy and EP – Energy Consumption are two distinct questions for distinct industries:
- EP – Energy applies to BNK, CSV, FBN, HEA, INS, PRO, PUB, SOF, TLS, TSV
- EP – Energy Consumption applies to the other 51 industries

**Assessment Focus**

![Assessment Focus Icons]

**Question Rationale**

Producing more with less material is essential for many industries affected by the growing scarcity of natural resources. Operational Eco-Efficiency enhances competitiveness in terms of cost reductions and reduces environmental liabilities. It also enables companies to be better prepared for future environmental regulations.

The key focus is on inputs and outputs of business operations and the assessment of trends in the consumption of natural resources and the production of environmental waste products specific to each industry. In this question we are aiming to find out the total energy consumption.

**Question Layout**

Please complete the following table about total energy consumption. For each row in the table, it is mandatory that values are provided in the same unit. Please see the information button for definitions of the cost options.

Also, please ensure that you have correctly filled in the Company Information section at the beginning of the questionnaire, and that the coverage in the table below is related to the denominator relevant for your company as indicated in that section.

<table>
<thead>
<tr>
<th>Total energy consumption</th>
<th>Unit</th>
<th>FY 2015</th>
<th>FY 2016</th>
<th>FY 2017</th>
<th>FY 2018</th>
<th>What was your target for FY 2018?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total non-renewable energy consumption</td>
<td>MWh</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total renewable energy (biomass, solar, wind energy, etc.) purchased or generated for own consumption</td>
<td>MWh</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Please specify:__________</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total costs of energy consumption</td>
<td>Currency:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Data coverage (as % of denominator)</td>
<td>Percentage of:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**PUBLIC REPORTING**

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

**THIRD-PARTY VERIFICATION**

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

**DATA CONSISTENCY**

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

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

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

For general guidance related to environmental performance data, please refer to the general guidance at the beginning of this section.

Energy costs include electricity, direct purchases, fuel for owned-energy production and other fuels. Also included are: depreciation of owned-energy projects, minus related income (e.g. generated by waste sold for energy production, energy sold from owned-energy facilities, etc.). It does not include total capital investment or maintenance costs.

Data requirements

Third-party verification For third-party verification, we expect that data in the most recent year reported has been third-party verified and that relevant documentation is attached showing this verification. Internal audits or verification will not be considered.

Data consistency:

- If the environmental performance data reported in the questionnaire do not correspond to the publicly reported figures, the corresponding option should be marked and the discrepancy should be explained. This option should not be indicated if the information is not publicly reported at all.
- If there is a temporary reduction in coverage due to, for example, a major acquisition, the corresponding box should be marked and the reduction should be explained.
- If it is not possible to report the figures in absolute terms, the data should be reported in relative terms and the corresponding box should be ticked. Please note that information should always be reported in absolute terms if possible, even if it deviates from public reporting. If relative figures are provided, this need to be done for ALL environmental performance figures and the denominator should be set to 1.

General data requirements Environmental performance data should cover the activities of the entire company with the same consolidation as used in financial reporting and must refer to the financial year (e.g., 01/01 to 31/12 for both financial and environmental data) and be aligned with the figures reported in the Company Information section.

Target: We require the absolute target for the most recent reporting year. If your company has a multiple year and/or relative target, please extrapolate what the target value would have to be for the last financial year to make sure you are progressing well towards achieving the target by the end of the target period.

In particular, environmental data of group companies should follow the following rules:

- Environmental data of companies that are consolidated at equity must not be considered.
- Environmental data of companies that are consolidated proportionally must be considered to the proportion at which they are consolidated financially.
- Environmental data of companies that are fully consolidated must be fully considered irrespective of the proportion to which they belong to the group.

- Environmental data of business travel other than by owned and/or operated fleet should not be included unless specifically asked for.
- Environmental data should refer to the specific company structure of each particular year. There should be no pro-forma backward consolidation of the current company structure.
- Environmental data of companies that are sold or no longer consolidated should be excluded from environmental data as of the reporting period in which the company has not been consolidated anymore.
- Environmental data of companies that have been bought should only be included as of the reporting period in which the company is consolidated financially for the first time.
- Where environmental data does not cover all consolidated activities of the company, the scope should be indicated together with the environmental data that is known.
- Where the reported environmental data deviates from these definitions you are asked to explain in what way the data provided differs from the definitions.
- If a company publicly reports on long-term but not annual targets, an annual target has to be estimated based on internal target setting or a linear distribution.
- The data must be provided in the unit indicated in the question. If the company is tracking the specific indicator in a different unit, the unit converter must be used to convert the data into the preferred unit.
- Please ensure that the Company Information section has been correctly filled in, and that the coverage in the table below is based on the same denominator.

Disclosure requirements for partially public question Additional credit will be granted for relevant publicly available evidence covering the following aspect of this question:

- Total non-renewable energy consumption figure for at least the most recent reported year.

References

GRI Standards 302-1 & 302-2 are relevant for this question.
4.1.4 EP – Energy Consumption

**Assessment Focus**

**Question Rationale**

Producing more with less material is essential for many industries affected by the growing natural resource scarcity. Operational Eco-Efficiency enhances competitiveness in terms of cost reductions and reduced environmental liabilities. It also enables companies to be better prepared for future environmental regulations.

The key focus is on inputs and outputs of business operations and assessing trends in natural resource consumption and environmental waste production specific to each industry.

In this question we are aiming to find out the total energy consumption. Please list renewable energies separately and specify the type of renewable energy in the text box.

**Question Layout**

Please complete the following table about total energy consumption. For each row in the table, it is mandatory that the values provided are in the same unit. Please see the Information Button for definitions of the cost options.

Also, please ensure that you have correctly filled in the Company Information section at the beginning of the questionnaire, and that the coverage in the table below is related to the denominator relevant for your company as indicated in that section.

<table>
<thead>
<tr>
<th>Total energy consumption</th>
<th>Unit</th>
<th>FY 2015</th>
<th>FY 2016</th>
<th>FY 2017</th>
<th>FY 2018</th>
<th>What was your target for FY 2018?</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Non-renewable fuels (nuclear fuels, coal, oil, natural gas, etc.) purchased and consumed</td>
<td>MWh</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>B. Non-renewable electricity purchased</td>
<td>MWh</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>C. Steam/heat/cooling and other energy (non-renewable) purchased</td>
<td>MWh</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>D. Total renewable energy (wind, solar, biomass, hydroelectric, geothermal, etc.) purchased or generated</td>
<td>MWh</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>E. Total non-renewable energy (electricity and heating &amp; cooling) sold</td>
<td>MWh</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total non-renewable energy consumption (A+B+C+E)</td>
<td>MWh</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total costs of energy consumption</td>
<td>Currency</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Data coverage (as % of denominator)</td>
<td>Percentage</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
PUBLIC REPORTING
- Our data is publicly available. Please provide supporting evidence or web link.

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

DATA CONSISTENCY
- We report publicly on this information, but the data in the table above differ from our publicly reported figures. Please provide an explanation for this difference in the comment box.
- We have a temporary coverage reduction or target challenge due to corporate actions. Please briefly explain if a merger, acquisition, divestment, etc. has temporarily caused a reduction in your ability to report optimal coverage or caused your target to appear abnormal.
- We are not able to report this information in absolute terms; the information provided in the table above is normalized data. For the purpose of this question, please always provide absolute figures if available.

Question-Specific Guidance & Definitions
For general guidance related to environmental performance data, please refer to the general guidance at the beginning of this section.

A. Fossil Fuels: Include fuels for electricity generation.
B. Non-renewable electricity purchased: only non-renewable electricity, excluding self-generated electricity.
C. Steam/heating/cooling and other energy purchased (only non-renewable energy): if no explicit mention of renewables, assume non-renewable energy. Exclude self-generated steam/heating/cooling from fuels listed in A, D) Renewable Energy purchased or generated. Include both purchased and self-generated energy.
D. Total non-renewable energy sold (electricity, heating & cooling): Primarily for electric utilities, for most other companies this will be "Not applicable".
E. Total non-renewable energy consumption: Sum of (A + B + C) minus E (remove the D).
F. Total cost of energy consumption (see below).
G. Energy costs include electricity, direct purchases, fuel for owned-energy production, other fuel, etc., plus depreciation of owned-energy projects, minus related income (e.g. generated by waste sold for energy production, energy sold from owned-energy facilities, etc.). It does not include total capital investment or maintenance costs. In the table, the methodology for total costs of energy consumption can be selected from three options:
   a. total cost of energy purchased
   b. total cost of energy purchased, minus income generated (e.g. by waste sold for energy production, energy sold from owned-energy facilities, etc.)
   c. total cost of energy purchased plus depreciation of owned-energy projects, minus income generated

Please pay attention to the correct conversion of units! See also: https://www.iea.org/statistics/resources/unitconverter/ NB: we only score total energy consumption, so if you don’t have all data available it is ok to only provide data for Total energy consumption.

Data requirements
Third-party verification: For third-party verification, we expect that data in the most recent year reported has been third-party verified and that relevant documentation is attached showing this verification. Internal audits or verification will not be considered.

Data consistency:
- If the environmental performance data reported in the questionnaire do not correspond to the publicly reported figures, the corresponding option should be marked and the discrepancy should be explained. This option should not be indicated if the information is not publicly reported at all.
- If there is a temporary reduction in coverage due to, for example, a major acquisition, the corresponding box should be marked and the reduction should be explained.
- If it is not possible to report the figures in absolute terms, the data should be reported in relative terms and the corresponding box should be ticked. Please note that information should always be reported in absolute terms if possible, even if it deviates from public reporting. If relative figures are provided, this need to be done for ALL environmental performance figures and the denominator should be set to 1.

General data requirements:
Environmental performance data should cover the activities of the entire company with the same consolidation as used in financial reporting and must refer to the financial year (e.g., 01/01 to 31/12 for both financial and environmental data) and be aligned with the figures reported in the Company Information section.

Target: We require the absolute target for the most recent reporting year. If your company has a multiple year and/or relative target, please extrapolate what the target value would have to be for the last financial year to make sure you are progressing well towards achieving the target by the end of the target period.

In particular, environmental data of group companies should follow the following rules:
- Environmental data of companies that are consolidated at-equity must not be considered.
- Environmental data of companies that are consolidated proportionally must be considered to the
proportion at which they are consolidated financially.

- Environmental data of companies that are fully consolidated must be fully considered irrespective of the proportion to which they belong to the group.
- Environmental data of business travel other than by owned and/or operated fleet should not be included unless specifically asked for.
- Environmental data should refer to the specific company structure of each particular year. There should be no pro-forma backward consolidation of the current company structure.
- Environmental data of companies that are sold or no longer consolidated should be excluded from environmental data as of the reporting period in which the company has not been consolidated any more.
- Environmental data of companies that have been bought should only be included as of the reporting period in which the company is consolidated financially for the first time.
- Where environmental data does not cover all consolidated activities of the company, the scope should be indicated together with the environmental data that is known.
- Where the reported environmental data deviates from these definitions you are asked to explain in what way the data provided differs from the definitions.

- If a company publicly reports on long-term but not annual targets, an annual target has to be estimated based on internal target setting or a linear distribution.
- The data must be provided in the unit indicated in the question. If the company is tracking the specific indicator in a different unit, the unit converter must be used to convert the data into the preferred unit.
- Please ensure that the Company Information section has been correctly filled in, and that the coverage in the table below is based on the same denominator.

**Disclosure requirements for partially public question** Additional credit will be granted for relevant publicly available evidence covering the following aspect of this question:

- Total non-renewable energy consumption for at least the most recent reported year.

**References**

GRI Standards 302-1 & 302-2 are relevant for this question.
4.1.5 EP – Water

**Question Rationale**
Producing more with less material is essential for many industries affected by the growing scarcity of natural resources. Operational Eco-Efficiency enhances competitiveness in terms of cost reductions and reduces environmental liabilities. It also enables companies to be better prepared for future environmental regulations.

The key focus is on inputs and outputs of business operations and the assessment of trends in the consumption of natural resources and the production of environmental waste products specific to each industry.

**Question Layout**
Please provide your company’s total water use for the part of your company’s operations for which you have a reliable and auditable data acquisition and aggregation system. Please refer to the information button for additional clarifications. For each row in the table, it is mandatory that the values provided are in the same unit.

Also, please ensure that you have correctly filled in the Company Information section at the beginning of the questionnaire, and that the coverage in the table below is related to the denominator relevant for your company as indicated in that section.

<table>
<thead>
<tr>
<th>Water consumption</th>
<th>Unit</th>
<th>FY 2015</th>
<th>FY 2016</th>
<th>FY 2017</th>
<th>FY 2018</th>
<th>What was your target for FY 2018?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total water use</td>
<td>Million cubic meters</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Data Coverage (as % of denominator)</td>
<td>Percentage of</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

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

**DATA CONSISTENCY**
- We report publicly on this information, but the data in the table above differ from our publicly reported figures. Please provide an explanation for this difference in the comment box.
- We have a temporary coverage reduction or target challenge due to corporate actions. Please briefly explain if a merger, acquisition, divestment, etc., has temporarily caused a reduction in your ability to report optimal coverage or caused your target to appear abnormal.
- We are not able to report this information in absolute terms; the information provided in the table above is normalized data. For the purpose of this question, please always provide absolute figures if available.
- The figures provided in the table above are NOT reported according to the definition provided by us (water withdrawn, net of water discharged to the source with higher or equal quality).
**Question-Specific Guidance & Definitions**

For general guidance related to environmental performance data, please refer to the general guidance at the beginning of this section.

**Total Water Use:** Total Water Use refers to total water consumption, i.e., water withdrawn, net of water discharged to the source with higher or equal quality. Please mark the corresponding box if it isn’t possible to report according to this definition.

**Data requirements**

**Third-party verification:** For third-party verification, we expect that data in the most recent year reported has been third-party verified and that relevant documentation is attached showing this verification. Internal audits or verification will not be considered.

Data consistency:
- If the environmental performance data reported in the questionnaire do not correspond to the publicly reported figures, the corresponding option should be marked and the discrepancy should be explained. This option should not be indicated if the information is not publicly reported at all.
- If there is a temporary reduction in coverage due to, for example, a major acquisition, the corresponding box should be marked and the reduction should be explained.
- If it is not possible to report the figures in absolute terms, the data should be reported in relative terms and the corresponding box should be ticked. Please note that information should always be reported in absolute terms if possible, even if it deviates from public reporting. If relative figures are indicated, this need to be done for ALL environmental performance figures and the denominator should be set to 1.
- If the data reported are not consistent with the definition provided above, the data should be provided in the table, the option should be marked, and an explanation of how it differs should be provided in the comment box.

General data requirements:
Environmental performance data should cover the activities of the entire company with the same consolidation as used in financial reporting and must refer to the financial year (e.g., 01/01 to 31/12 for both financial and environmental data) and be aligned with the figures reported in the Company Information section.

**Target:** We require the absolute target for the most recent reporting year. If your company has a multiple year and/or relative target, please extrapolate what the target value would have to be for the last financial year to make sure you are progressing well towards achieving the target by the end of the target period.

In particular, environmental data of group companies should follow the following rules:
- Environmental data of companies that are consolidated at-equity must not be considered.
- Environmental data of companies that are consolidated proportionally must be considered to the proportion at which they are consolidated financially.
- Environmental data of companies that are fully consolidated must be fully considered irrespective of the proportion to which they belong to the group.
- Environmental data of business travel other than by owned and/or operated fleet should not be included unless specifically asked for.
- Environmental data should refer to the specific company structure of each particular year. There should be no pro-forma backward consolidation of the current company structure.
- Environmental data of companies that are sold or no longer consolidated should be excluded from environmental data as of the reporting period in which the company has not been consolidated any more.
- Environmental data of companies that have been bought should only be included as of the reporting period in which the company is consolidated financially for the first time.
- Where environmental data does not cover all consolidated activities of the company, the scope should be indicated together with the environmental data that is known.
- Where the reported environmental data deviates from these definitions you are asked to explain in what way the data provided differs from the definitions.
- If a company publicly reports on long-term but not annual targets, an annual target has to be estimated based on internal target setting or a linear distribution.
- The data must be provided in the unit indicated in the question. If the company is tracking the specific indicator in a different unit, the unit converter must be used to convert the data into the preferred unit.
- Please ensure that the Company Information section has been correctly filled in, and that the coverage in the table below is based on the same denominator.

**Disclosure requirements for publicly public question:** Additional credit will be granted for relevant publicly available evidence covering the following aspect of this question:
- Total water use data figure for at least the most recent reported year.

**References**

GRI 303-5 is relevant for this question.
4.1.6 EP – Water Consumption

**Assessment Focus**

**Question Rationale**

Producing more with less material is essential for many industries affected by the growing scarcity of natural resources. Operational Eco-Efficiency enhances competitiveness in terms of cost reductions and reduces environmental liabilities. It also enables companies to be better prepared for future environmental regulations.

The key focus is on inputs and outputs of business operations and the assessment of trends in the consumption of natural resources and the production of environmental waste products specific to each industry.

**Question Layout**

Please provide your company's total net fresh water consumption, including data for fresh water extraction and consumption. Please refer to the information button for additional information. For each row in the table, it is mandatory that the values are provided in the same unit.

Also, please ensure that you have correctly filled in the Company Information section at the beginning of the questionnaire, and that the coverage in the table below is related to the denominator relevant for your company as indicated in that section. If your company's final product is water (e.g. water utilities, please mark “not applicable” in this question.

<table>
<thead>
<tr>
<th>Water consumption</th>
<th>Unit</th>
<th>FY 2015</th>
<th>FY 2016</th>
<th>FY 2017</th>
<th>FY 2018</th>
<th>What was your target for FY 2018?</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Withdrawal: Total municipal water supplies (or from other water utilities)</td>
<td>Million cubic meters</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>B. Withdrawal: Fresh surface water (lakes, rivers, etc.)</td>
<td>Million cubic meters</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>C. Withdrawal: Fresh groundwater</td>
<td>Million cubic meters</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>D. Discharge: Water returned to the source of extraction at similar or higher quality as raw water extracted (only applies to B and C)</td>
<td>Million cubic meters</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>E. Total net fresh water consumption (A+B+C-D)</td>
<td>Million cubic meters</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Data Coverage (as % of denominator)</td>
<td>Percentage of</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
PUBLIC REPORTING
☐ Our data is publicly available. Please provide supporting evidence or web link.

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

DATA CONSISTENCY
☐ We report publicly on this information, but the data in the table above differ from our publicly reported figures. Please provide an explanation for this difference in the comment box:
☐ We have a temporary coverage reduction or target challenge due to corporate actions. Please briefly explain if a merger, acquisition, divestment, etc. has temporarily caused a reduction in your ability to report optimal coverage or caused your target to appear abnormal:
☐ We are not able to report this information in absolute terms; the information provided in the table above is normalized data. For the purpose of this question, please always provide absolute figures if available.

Question-Specific Guidance & Definitions

For general guidance related to environmental performance data, please refer to the general guidance at the beginning of this section.

Total net fresh water consumption(e) = Municipal water (A) + Fresh surface water (B) + Fresh ground water (C) - Water returned to the source of extraction at similar or higher quality as raw water extracted (D). Please do not include salt or brackish water into the reported figures. Rainwater collected and waste water should not be reported. Only water used for cooling and returned to the source at equal or higher quality should be reported under item D.

Total municipal water supplies All water supplied directly by the municipality and/or other public or private water utilities.

Fresh surface water (lakes, rivers, etc.) It includes water from wetlands, rivers, lakes. Do not include sea water.

Fresh ground water Fresh water from below the surface. Do not include brackish ground water.

Data requirements

Third-party verification For third-party verification, we expect that data in the most recent year reported has been third-party verified and that relevant documentation is attached showing this verification. Internal audits or verification will not be considered.

Data consistency:
- If the environmental performance data reported in the questionnaire do not correspond to the publicly reported figures, the corresponding option should be marked and the discrepancy should be explained. This option should not be indicated if the information is not publicly reported at all.
- If there is a temporary reduction in coverage due to, for example, a major acquisition, the corresponding box should be marked and the reduction should be explained.
- If it is not possible to report the figures in absolute terms, the data should be reported in relative terms and the corresponding box should be ticked. Please note that information should always be reported in absolute terms if possible, even if it deviates from public reporting. If relative figures are indicated, this need to be done for ALL environmental performance figures and the denominator should be set to 1.

General data requirements Environmental performance data should cover the activities of the entire company with the same consolidation as used in financial reporting and must refer to the financial year (e.g., 01/01 to 31/12 for both financial and environmental data) and be aligned with the figures reported in the Company Information section.

Target We require the absolute target for the most recent reporting year. If your company has a multiple year and/or relative target, please extrapolate what the target value would have to be for the last financial year to make sure you are progressing well towards achieving the target by the end of the target period. In particular, environmental data of group companies should follow the following rules:
- Environmental data of companies that are consolidated at-equity must not be considered.
- Environmental data of companies that are consolidated proportionally must be considered to the proportion at which they are consolidated financially.
- Environmental data of companies that are fully
consolidated must be fully considered irrespective of the proportion to which they belong to the group.

- Environmental data of business travel other than by owned and/or operated fleet should not be included unless specifically asked for.
- Environmental data should refer to the specific company structure of each particular year. There should be no pro-forma backward consolidation of the current company structure.
- Environmental data of companies that are sold or no longer consolidated should be excluded from environmental data as of the reporting period in which the company has not been consolidated any more.
- Environmental data of companies that have been bought should only be included as of the reporting period in which the company is consolidated financially for the first time.
- Where environmental data does not cover all consolidated activities of the company, the scope should be indicated together with the environmental data that is known.
- Where the reported environmental data deviates from these definitions you are asked to explain in what way

the data provided differs from the definitions.

- If a company publicly reports on long-term but not annual targets, an annual target has to be estimated based on internal target setting or a linear distribution.
- The data must be provided in the unit indicated in the question. If the company is tracking the specific indicator in a different unit, the unit converter must be used to convert the data into the preferred unit.
- Please ensure that the Company Information section has been correctly filled in, and that the coverage in the table below is based on the same denominator.

Disclosure requirements for partially public question

Additional credit will be granted for relevant publicly available evidence covering the following aspect of this question:

- Total net fresh water consumption for at least the most recent reported year.

References


GRI 303-3 and GRI 303-4 are relevant for this question.
4.1.7 EP – Waste

**Assessment Focus**

*Partially public: additional credit will be granted for relevant publicly available evidence.*

**Question Rationale**

Producing more with less material is essential for many industries affected by the growing scarcity of natural resources. Operational Eco-Efficiency enhances competitiveness in terms of cost reductions and reduces environmental liabilities. It also enables companies to be better prepared for future environmental regulations.

The key focus is on inputs and outputs of business operations and the assessment of trends in the consumption of natural resources and the production of environmental waste products specific to each industry.

**Question Layout**

Please indicate the total waste that your company disposes of (i.e., that is not reused or recycled, repurposed, or sent for energy recovery) for the part of your company’s operations for which you have a reliable and auditable data acquisition and aggregation system. Disposed waste includes waste that is sent to landfill or incinerated without energy recovery. Total volumes include waste that is disposed of both onsite and off-site.

Please refer to the information button for additional clarifications. For each row in the table, it is mandatory that the values provided are in the same unit. Please also ensure that the “Denominator” question in this criterion has been correctly filled in, and that the coverage in the table below is based on the same denominator.

<table>
<thead>
<tr>
<th>Waste generation</th>
<th>Unit</th>
<th>FY 2015</th>
<th>FY 2016</th>
<th>FY 2017</th>
<th>FY 2018</th>
<th>What was your target for FY 2018?</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Total waste generated</td>
<td>metric tonnes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b. Total waste used/recycled/sold</td>
<td>metric tonnes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TOTAL WASTE DISPOSED (A - B)</td>
<td>metric tonnes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Data coverage (as % of denominator)</td>
<td>percentage of:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**PUBLIC REPORTING**

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

**THIRD PARTY VERIFICATION**

- The above data have been verified by the following organization at least for the last fiscal year when data were collected:

**DATA CONSISTENCY**

- We report publicly on this information, but the data in the table above differ from our publicly reported figures. Please provide an explanation for this difference in the comment box.
- We have a temporary coverage reduction or target challenge due to corporate actions. Please briefly explain if a merger, acquisition, divestment, etc. has temporarily caused a reduction in your ability to report optimal coverage or caused your target to appear abnormal.
- We are not able to report this information in absolute terms; the information provided in the table above is normalized data. For the purpose of this question, please always provide absolute figures if available.
- The data reported in the table above are NOT consistent with the definition provided by us (see information button for more detailed information).
Question-Specific Guidance & Definitions
For general guidance related to environmental performance data, please refer to the general guidance at the beginning of this section.

Total waste generated: Waste may be generated during the extraction and processing of raw materials, during product manufacturing, during the consumption of final products, and during any other human activity. For the purposes of this question, we are interested only in solid waste.

Total waste used/recycled/sold: Generated waste which has been reused, recycled or sold for instance for energy recovery purposes.

Data requirements
Specific data requirement for Waste
Waste should be reported in dry metric tonnes of waste. Waste disposed should include materials landfilled, subject to deep well injection or incinerated without energy recovery (both on-site and off-site). Materials that are sent offsite for beneficial use (such as for recycling, re-purposing, or energy recovery) do not need to be reported in this question. Waste from extraordinary activities should not be considered. The definition of what is considered to be extraordinary should be consistent with financial reporting. Example: we would not expect a pharmaceutical company building its new headquarters to report the resulting construction waste.

Third-party verification For third-party verification, we expect that data in the most recent year reported has been third-party verified and that relevant documentation is attached showing this verification. Internal audits or verification will not be considered.

Data consistency:
• If the environmental performance data reported in the questionnaire do not correspond to the publicly reported figures, the corresponding option should be marked and the discrepancy should be explained. This option should not be indicated if the information is not publicly reported at all.
• If there is a temporary reduction in coverage due to, for example, a major acquisition, the corresponding box should be marked and the reduction should be explained.
• If it is not possible to report the figures in absolute terms, the data should be reported in relative terms and the corresponding box should be ticked. Please note that information should always be reported in absolute terms if possible, even if it deviates from public reporting. If relative figures are indicated, this need to be done for ALL environmental performance figures and the denominator should be set to 1.
• If the data reported are not consistent with the definition provided above, the data should be provided in the table, the option should be marked, and an explanation of how it differs should be provided in the comment box.

General data requirements:
• For companies in applicable sectors that also have a separate question on mineral waste or hazardous waste do not include this data here but report it separately and in response to the appropriate question.
• Environmental performance data should cover the activities of the entire company with the same consolidation as used in financial reporting and must refer to the financial year (e.g., 01/01 to 31/12 for both financial and environmental data) and be aligned with the figures reported in the Company Information section question.
• In particular, environmental data of group companies should follow the following rules:
  • Environmental data of companies that are consolidated at-equity must not be considered.
  • Environmental data of companies that are consolidated proportionally must be considered to the proportion at which they are consolidated financially.
  • Environmental data of companies that are fully consolidated must be fully considered irrespective of the proportion to which they belong to the group.
  • Environmental data of business travel other than by owned and/or operated fleet should not be included unless specifically asked for.
  • Environmental data should refer to the specific company structure of each particular year. There should be no pro-forma backward consolidation of the current company structure.
  • Environmental data of companies that are sold or no longer consolidated should be excluded from environmental data as of the reporting period in which the company has not been consolidated any more.
  • Environmental data of companies that have been bought should only be included as of the reporting period in which the company is consolidated financially for the first time.
  • Where environmental data does not cover all consolidated activities of the company, the scope should be indicated together with the environmental data that is known.
  • Where the reported environmental data deviates from these definitions you are asked to explain in what way the data provided differs from the definitions.
  • If a company publicly reports on long-term but not annual targets, an annual target has to be estimated based on internal target setting or a linear distribution.
  • Please ensure that the Company Information section has been correctly filled in, and that the coverage in the table below is based on the same denominator.

Disclosure requirements for partially public question
Additional credit will be granted for relevant publicly available evidence covering the following aspect of this question:
• Total waste disposed figure for at least the most recent reported year.

References
GRI Standard 306-2 is relevant for this question.
4.2 Climate Strategy

Most industries are likely to be impacted by climate change, albeit to a varying degree; consequently, they face a need to design strategies commensurate to the scale of the challenge for their industry. While most focus on the risks associated with a changing climate, some seek to identify and seize the business opportunities linked to this global challenge.

4.2.1 Management Incentives

Assessment Focus

Question Rationale

This question aims to capture how rewards are associated with the management of climate change issues, including attainment of targets. This ensures that climate-related ambitions and goals are embedded throughout the company and that management is held accountable for the achievement of these goals.

Question Layout

Do you provide incentives for the management of climate change issues, including the attainment of targets?

- Yes. Please provide further details on the climate change-related incentives provided, starting from the highest management level.

<table>
<thead>
<tr>
<th>Who is entitled to benefit from this incentive?</th>
<th>Type of incentives</th>
<th>Incentivized KPIs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Drop-down menu:</td>
<td>Drop-down menu:</td>
<td>Drop-down menu:</td>
</tr>
<tr>
<td>Chief Executive Officer (CEO)</td>
<td>Monetary</td>
<td>Emissions reduction</td>
</tr>
<tr>
<td>Other Named Executives Officers</td>
<td>Recognition (non-monetary)</td>
<td>Energy reduction</td>
</tr>
<tr>
<td>Business Unit Managers</td>
<td>Other</td>
<td>Efficiency project</td>
</tr>
<tr>
<td>Employees</td>
<td></td>
<td>Purchasing</td>
</tr>
<tr>
<td>Other, please specify ______</td>
<td></td>
<td>Supply chain engagement</td>
</tr>
<tr>
<td>2.</td>
<td>2.</td>
<td>Other, please specify ______</td>
</tr>
<tr>
<td>3.</td>
<td>3.</td>
<td></td>
</tr>
</tbody>
</table>

- No, we do not provide incentives for the management of climate change issues.
- Not applicable. Please provide explanations in the comment box below.
- Not known.

Question-Specific Guidance & Definitions

Incentives: Incentives can be positive (i.e., give people something) or negative (prevent access to something). Examples of incentive types include:

- Monetary: A bonus or some form of financial remuneration.
- Recognition (non-monetary): A employee award (e.g., employee of the year) or career progression scheme, but not tied directly to any form of financial remuneration.
- Other non-monetary reward: including increased holiday allowances, special assignment, etc.
Data Requirements

If several types of incentives are used in your company, please select the incentive that is most commonly employed and include the fact that your company also uses other incentives in the comment box. Each employee group should only be selected once.

References

- This question refers to CDP question C1.3a.

- The questions in this criterion have been developed in alignment with the CDP (www.cdp.net).

- When you select an incentive for a certain employee group, it is not necessary for all employees in this group to be entitled to benefit from this incentive. For example, you can select the category "Business Unit Managers" even if only one manager is entitled to the incentive.
4.2.2 Climate Change Strategy

Assessment Focus

Supporting evidence is required for parts of this question.

Question Rationale

This question focuses on the processes and strategies that organizations use to structure their approach to climate change. Companies should select the option that best describes their risk management procedures with regards to climate change risks and opportunities.

Question Layout

How are your organizations’ processes for identifying, assessing, and managing climate-related issues integrated into your overall risk management? Please attach supporting evidence.

- Integrated into multi-disciplinary company-wide risk management processes, i.e. a documented process where climate change risks and opportunities are integrated into the company’s centralized enterprise risk management program covering all types/sources of risks and opportunities.

Reference Link

- A specific climate change risk management process, i.e. a documented process which considers climate change risks and opportunities separate from other business risks and opportunities.

Reference Link

Data requirements

If you have more than one procedure in place in your organization, please select the one that is most commonly employed. Please note that the CDP submission is not considered as a relevant supporting document in this question.

References

- This question refers to CDP question C2.2.
- The questions in this criterion have been developed in alignment with the CDP (https://www.cdp.net).
4.2.3 Scenario Analysis

Assessment Focus

Question Rationale

Today, many organizations are affected by climate change-related risks. However, the most significant effects of climate change are likely to emerge over the medium to longer term, while the precise timing and magnitude of these impacts remain uncertain. This uncertainty represents a challenge for organizations and investors to understand the potential effects of climate change on their businesses, strategies, and financial performance.

To appropriately incorporate these potential impacts in their planning processes, organizations need to consider how such risks and opportunities may evolve and what the potential implications may be under different conditions. One way to do this is through using climate-related scenario analysis.

Question Layout

Does your organization use climate-related scenario analysis to inform your business strategy?

- Yes, we use climate-related scenario analysis to inform our business strategy:
  - Yes, qualitative
  - Yes, quantitative
  - Yes, qualitative and quantitative

Please specify the primary climate-related scenario analysis used by your organization:

<table>
<thead>
<tr>
<th>Climate-related scenarios</th>
</tr>
</thead>
<tbody>
<tr>
<td>Drop-down menu:</td>
</tr>
<tr>
<td>2DS</td>
</tr>
<tr>
<td>IEA 450</td>
</tr>
<tr>
<td>Greenpeace</td>
</tr>
<tr>
<td>DDPP</td>
</tr>
<tr>
<td>IRENA</td>
</tr>
<tr>
<td>RCP 2.6</td>
</tr>
<tr>
<td>IEA B2DS</td>
</tr>
<tr>
<td>IEA Sustainable development scenario</td>
</tr>
<tr>
<td>Nationally determined contributions (NDCs)</td>
</tr>
<tr>
<td>Other, please specify: ________</td>
</tr>
</tbody>
</table>

Question-Specific Guidance & Definitions

Scenario analysis is a strategic planning tool to help an organization understand how it might perform in different future states. It is a tool to enhance critical strategic thinking by challenging ‘business-as-usual’ assumptions and instead exploring alternatives based on their relative impact and likelihood of occurrence (i.e. critical uncertainties).

Common climate-related scenarios are based on exposure to either transition risk pathways or physical risks. Transition risk pathway scenarios consider how an organization is impacted by changes to policy/regulation, technology or market changes aimed at emissions reductions, etc. Physical risk scenarios assess the impact of acute or chronic physical change related to climate change such extreme weather, rising sea levels, water shortage, etc.

Scenarios are stories that have been developed for the future, and aim to shed light on the decisions need to be made today. A scenario describes a potential path of development that will lead to a particular outcome or goal. Scenarios are not forecasts or predictions.

References

- CDP (2017), CDP Technical Note on Scenario Analysis – Conducting and disclosing scenario analysis
- This question refers to CDP questions C3.1a and C3.1d.
- The questions in this criterion have been developed in alignment with the CDP [www.cdp.net]
4.2.4 Climate-related Targets

Assessment Focus

Question Rationale
Most industries are likely to be impacted by climate change, albeit to a varying degree. Consequently, they need to design strategies which are adapted to the size of the challenge for their industry. Whilst the majority of the companies focus on risks associated with the changing climate, some seek to identify and seize the business opportunities linked to these global challenges. Setting emission reduction targets enables companies to adopt a systematic and disciplined approach towards reducing their emissions. With this question, we aim to find out if a company has set absolute and/or relative corporate targets to reduce greenhouse gas emissions.

Question Layout
Does your company have any corporate-level climate-related targets? Please fill out the “Alternative Method” table only if your organization doesn’t use the Standard Method.

- **Standard Method** - We have absolute and/or relative(intensity) emissions targets:

<table>
<thead>
<tr>
<th>Targets</th>
<th>Is this a science-based target?</th>
<th>Scope</th>
<th>% emissions in Scope</th>
<th>Baseline year</th>
<th>Emissions of baseline year in absolute tons of CO2e</th>
<th>Intensity measure/Metric</th>
<th>Year target was set</th>
<th>% reduction from baseline year</th>
<th>Target year</th>
<th>% achieved (emission reduction)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Absolute targets</td>
<td></td>
<td>Yes/No</td>
<td>Scope 1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>o Targets set</td>
<td></td>
<td></td>
<td>Scope 1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>o No targets set</td>
<td></td>
<td></td>
<td>Scope 2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>o Not known</td>
<td></td>
<td></td>
<td>Scope 1 &amp; Scope 2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>o Not known</td>
<td></td>
<td></td>
<td>Scope 1 &amp; Scope 2 combined</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>o Not known</td>
<td></td>
<td></td>
<td>Scope 1 &amp; Scope 2, but separately</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>o Not known</td>
<td></td>
<td></td>
<td>Not known</td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Relative (intensity) targets</td>
<td></td>
<td>Yes/No</td>
<td>Scope 1</td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>o Targets set</td>
<td></td>
<td></td>
<td>Scope 1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>o No targets set</td>
<td></td>
<td></td>
<td>Scope 2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>o Not known</td>
<td></td>
<td></td>
<td>Scope 1 &amp; Scope 2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>o Not known</td>
<td></td>
<td></td>
<td>Scope 1 &amp; Scope 2, but separately</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>o Not known</td>
<td></td>
<td></td>
<td>Not known</td>
<td></td>
<td></td>
<td></td>
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<td></td>
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<td></td>
</tr>
</tbody>
</table>

- **Alternative Method** - We have other key climate-related targets. Please specify:

<table>
<thead>
<tr>
<th>Target</th>
<th>KPI - Metric numerator</th>
<th>KPI - Metric denominator (for intensity targets only)</th>
<th>Baseline year</th>
<th>Target was set in year</th>
<th>Target year</th>
<th>KPI in baseline year</th>
<th>KPI in target year</th>
<th>Is it part of an initiative?</th>
</tr>
</thead>
</table>

SAM • 92
We do not set any targets for GHG emissions.
Not applicable. Please provide explanations in the comment box below.
Not known

**Question-Specific Guidance & Definitions**

**Absolute target:** A target that describes a reduction in actual emissions in a future year when compared to a base year.

**Intensity target:** A target that describes a future reduction in emissions that have been normalized to a business metric when compared to normalized emissions in a base year.
Metric: Grams CO2e or Metric tons CO2e per kilometer, per USD ($) value-added, square meter, per unit revenue, per unit FTE employee, per unit hour worked, per unit of production, per unit of service provided, etc.

**Science-based targets** Targets adopted by companies to reduce greenhouse gas (GHG) emissions are considered “science-based” if they are in line with the level of decarbonization required to keep global temperature increase below 2 degrees Celsius compared to pre-industrial temperatures, as described in the Fifth Assessment Report of the Intergovernmental Panel on Climate Change (IPCC AR5).* Source: Science based targets Initiative.

**Other climate-related targets** Energy productivity, renewable energy consumption, renewable energy production, renewable fuel, waste, zero/low-carbon vehicle, energy usage, land use, methane reduction target, engagement with suppliers, etc.

**Examples of overarching initiative** RE100, EP100, EV100, Below50 – sustainable fuels, Science-based targets initiative, reduce short-lived climate pollutants, Remove deforestation, Low-Carbon Technology Partnerships initiative.

**Data Requirements**
We expect companies to set absolute or relative (intensity) emission targets (Standard Method). However, if no emission targets are set, we give companies the option to report on other climate-related targets under the "Alternative Method" option.

For the Standard Method, if you provide the relative (intensity) target in this question, please also indicate the definition of the intensity measure used (metric). Please note that you can choose to provide absolute or relative targets, and you are not required to provide both.

**% of emissions in scope** the percentage of the total measured emissions of that particular scope in the base year that your target applies to.

**% reduction from base year** a company’s emissions reduction targets as a percentage reduction of emissions to be achieved in the target year compared with the base year.

**References**
- This question refers to CDP questions C4.1a, C4.1b and C4.2.
- The questions in this criterion have been developed in alignment with the CDP (www.cdp.net)
- Science based targets Initiative: http://sciencebasedtargets.org/what-is-a-science-based-target/

*IPCC AR5 is the latest report from the Intergovernmental Panel on Climate Change, which provides the most comprehensive assessment of climate science.
4.2.5 Low-Carbon Products

Assessment Focus

Question Rationale

This question focuses on the initiatives companies have in place to reduce the emissions derived from their activities – whether it be directly through their products or through the provision of products or services to third-parties to reduce their own emissions. The question focuses on the concepts of “low carbon products” and “avoided emissions”. There are various circumstances in which a company might consider that the use of its goods and services by others has the potential to reduce GHG emissions. For example, an insulation company might consider that the installation of its insulation in another organization’s premises might reduce the consumption of gas to heat the building, with the consequent reduction of GHG emissions from the property. Similarly, a consultancy providing advice services on energy efficiency/emissions reductions or a manufacturer producing a product with lower energy use requirements, compared with equivalent products on the market, could also consider themselves to reduce the GHG emissions of others (avoided emissions).

As the pressing need for reducing greenhouse gas emissions continues, investors are looking at different mechanisms to reduce the carbon intensity of their investments. They look beyond direct emissions and increasingly consider low carbon products and avoided emissions at 3rd parties (scope 3 emissions) for the overall calculation of the carbon footprints of their portfolios.

Taxonomies such as the Climate Bonds Taxonomy, Low-Carbon Investment (LCI) Registry Taxonomy, Addressing the Avoided Emissions Challenge for the Chemicals sector similarly function within this scientific parameter. Companies are encouraged to use this parameter when evaluating whether a product is low carbon or not and should evaluate their low carbon products in relation to their contribution to a low carbon economy. Different goods and services will have pertinent characteristics in which they can do this. This can include improving the energy efficiency of certain technologies so that they are consistent with avoiding dangerous climate change, or contribute to the adaptation side of dangerous climate change.

Question Layout

Please provide details of your products and/or services that you classify as low carbon products or that enable a third party to avoid GHG emissions.

You may provide information on either low carbon products, avoided emission products or both, depending on the relevance of the product types to your business.

<table>
<thead>
<tr>
<th>Type</th>
<th>Description of product(s)</th>
<th>Level of aggregation</th>
<th>% of total revenues from “climate change” product(s) in FY 2017</th>
<th>Estimated total avoided emissions per year</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low carbon product(s)</td>
<td>Drop-down menu: Product Group of products Company-wide</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Avoided emissions for third parties</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Question-Specific Guidance & Definitions

Low carbon products are products with low embedded emissions that contribute to the transition of a low carbon economy e.g. products required less raw material during the production process.

Avoided emissions products are products or services that allows a company’s client (i.e. a third party) to reduce their environmental footprint and avoid emissions e.g. eco-efficient products.

References

- This question refers to CDP question C4.5a.
- The questions in this criterion have been developed in alignment with the CDP [www.cdp.net](http://www.cdp.net).
4.2.6 Scope 3 GHG Emissions

Assessment Focus

Question Rationale
While many climate-change risks and impacts can be attributed to companies’ direct activities, many may lie elsewhere in the value chain. Today, Scope 1 and 2 emissions are broadly reported, but quantifying and reporting Scope 3 emissions poses a bigger challenge for companies. Increasingly, it is becoming important to understand the source of these emissions and how companies can work to decrease the impact of their indirect activities. With this question we assess to what extent companies consider Scope 3 emissions in their value chain.

Question Layout
Please specify the top 3 most relevant sources of scope 3 emissions that are relevant to your organization and account for your scope 3 emissions in financial year 2017.

For any source, you selected as relevant, please provide also an explanation.

<table>
<thead>
<tr>
<th>Source</th>
<th>Explanation for relevance</th>
<th>Metric tons CO2e</th>
<th>Emissions calculation methodology</th>
<th>Coverage</th>
<th>Percentage of emissions calculated using data obtained from suppliers or value chain partners:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Drop-down menu:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Please specify unit: ____</td>
</tr>
<tr>
<td>- Purchased Goods and Services (upstream)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Capital Goods (upstream)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Fuel- and Energy-Related Activities (not included in Scope 1 or Scope 2)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Upstream Transportation and Distribution</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Waste generated in operations (composting, incinerating)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Business Travel</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Employee Commuting</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Upstream Leased Assets</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Downstream Transportation and Distribution</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Processing of Sold Products (downstream)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Use of Sold Products</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- End-of-Life Treatment of Sold Products</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Downstream Leased Assets</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Franchises</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Investments</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Other upstream</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Other downstream</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Data Requirements

Emissions calculation methodology In this field, please provide a short description of the types and sources of data used to calculate emissions (e.g. activity data, emission factors and GWP values), along with a description of the methodologies, assumptions and allocation methods used to calculate emissions.

Explanation In this field, please provide details of how you have reached the conclusion that the source is relevant to your organization.

References
- This question refers to CDP question C6.5.
- This question has been developed in alignment with the CDP [www.cdp.net] and used the categories of Scope 3 emissions of the Greenhouse Gas Protocol’s Corporate Value Chain (Scope 3) Accounting and Reporting Standard, published in September 2011.
4.2.7 Internal Carbon Pricing

Assessment Focus

Question Rationale
Many major publicly-traded companies have integrated an “internal carbon price” as a core element in their ongoing business strategies. Such carbon pricing has become standard operating practice in business planning as a means of testing strategic and investment assumptions’ vulnerability to ever-stronger climate-related regulation and the broader emergence (explicitly or implicitly) of a cost of carbon. Utility and energy companies are the most likely to employ internal carbon prices for strategic operational decision-making, as they make long-term plans to meet energy and electricity needs, load factors, and amortization of plant investments and costs. Through this question we aim to assess how robustly companies are using this approach to anticipate an eventual regulatory approach in some form to address climate change.

Question Layout
Please indicate if your company uses an internal price of carbon. If yes, please specify your company’s objective to implement an internal carbon price and provide details of how this is being used within the organization and what the internal carbon price is. In case your company uses more than one type of internal carbon prices, please report the price that has the greatest impact on your organization (i.e. price * quantity of emissions generated).
- Yes, we use an internal price of carbon. Please specify your company’s objective to implement an internal carbon price and fill out the table below.
- Navigate GHG regulations
- Stakeholder expectations
- Change internal behavior
- Drive energy efficiency
- Drive low-carbon investments
- Stress test investments
- Identify and seize low-carbon opportunities
- Supplier engagement
- Other, please specify ___

<table>
<thead>
<tr>
<th>GHG Scope</th>
<th>Type of internal carbon price</th>
<th>Application</th>
<th>Price</th>
<th>Price setting approach</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scope 1</td>
<td>Shadow price</td>
<td>Drop-down menu: Company-wide (with local variations accepted)</td>
<td>[price]</td>
<td>Drop-down menu: External resources Benchmarking against peers Internal consultation: Technical analyses</td>
</tr>
<tr>
<td>Scope 2</td>
<td>Internal fee</td>
<td>Selected business units</td>
<td>[currency]</td>
<td></td>
</tr>
<tr>
<td>Scope 3</td>
<td>Internal trading</td>
<td>Selected regions’ Ad-hoc</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Implicit price</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Offsets</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Other, please specify: ___</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Question-Specific Guidance & Definitions

**Internal carbon price** Internal assumptions of a carbon price as a planning tool to help identify revenue opportunities, risks, and as an incentive to drive maximum energy efficiencies to reduce costs and guide capital investment decisions. Alternative names include “shadow price”, “internal carbon fee”, “carbon adder” or “carbon cost”.

Price setting approaches:
- **External resources** such as price projections from climate related regulation (e.g., the expected future ETS or carbon tax price and/or implicit carbon price) or the social cost of carbon.
- **Benchmarking against peers** such as by looking at carbon prices set by other companies within its own sector.
- **Internal consultation** at a price to be material enough to change business decisions and behavior.

Technical analyses of the required measures to achieve the targets on reducing its carbon footprint and the associated investments needed.
Data Requirements

In case your company uses more than one type of internal carbon prices, please report the price that has the greatest impact on your organization (i.e., price * quantity of emissions generated). Diversified mining companies (MXN) that do not have oil & gas or coal operations may mark "not applicable" in this question.

References

- Ecofys, the Generation Foundation and CDP (2017), "How to guide to corporate internal carbon pricing – Four dimensions to best practice approaches", Consultation Draft.
- This question refers to CDP question C11.3 and C11.3a.
- The questions in this criterion have been developed in alignment with the CDP (www.cdp.net).
4.3 Product Stewardship

Managing the environmental impact of products is a major concern for stakeholders. Integration of sustainable practices into the development of new products reflects an understanding of sustainability challenges and demonstrates the ability of the company to capitalize on market opportunities and minimize market risk at the product level. Moreover, product stewardship processes add value to products by minimizing the risk of harm both to people and the environment, thereby reducing potential liabilities. Our questions focus on Life Cycle Analysis (LCAs), product design, maintenance, take-back schemes, reuse in manufacturing processes, customer information and initiatives to promote product stewardship amongst stakeholders.

4.3.1 Product Design Criteria

**Supporting evidence is required for this question.**

**Assessment Focus**

![Folder and Pencil Icons]

**Question Rationale**

The purpose of this question is to assess the extent to which environmental criteria are integrated into the development of new products.

Integrating sustainable practices into new product development reflects an understanding of the challenges and demonstrates a company’s ability to capitalize on market opportunities and minimize risks related to potential liabilities.

**Question Layout**

Please specify the environmental criteria considered in the development of new products (and services), providing supporting evidence that these factors are included (e.g. a product design case study, internal manual, staff training document, etc.).

- Yes, we consider environmental criteria in the development of new products (and services). These include the following:

**Reference Link______________**

- Choice of raw materials or components (e.g. reduction of water, energy or material use/increase in renewable raw materials)

- Direct operations, production & manufacturing (e.g. reduction of emissions/energy use/waste/water, reduction of hazardous substances and toxic materials)

- Distribution, storage and transportation (e.g. increased safety, packaging choice, or reduced environmental impact)

- Use phase - operation and servicing/maintenance (e.g. provides energy/water/material savings, increased product durability)

- End of life management (e.g. recovery, disposal, biodegradation)
4.3.2 Life Cycle Assessment

Supporting evidence is required for this question

Assessment Focus

Question Rationale

The purpose of this question is to assess the extent to which environmental impacts are covered in your life cycle assessment (LCA) and how much of your product portfolio is evaluated for those impacts. We recognize that it is not reasonable for all products to undergo a full LCA and sometimes a simplified LCA is sufficient.

Therefore, we ask how many of your products are covered under a full LCA and how many under a simplified or another method. Acceptance is based on the supporting evidence clearly indicating which impacts are included in the LCAs. Acceptance for other assessment tools will be based upon description of impacts included and reference to externally recognized methodology.

Question Layout

Please indicate what impacts are covered by your life cycle assessment. Please check all that apply and provide supporting evidence. We do not expect companies to include all the impacts listed below.

Reference Link_________

<table>
<thead>
<tr>
<th>Resource Use</th>
<th>Ecological Consequences</th>
<th>Human Health</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Abiotic depletion (fossil fuels, minerals)</td>
<td>□ Acidification □ Dust &amp; particulate matter □ Ecotoxicity □ Eutrophication □ Global warming □ Ozone depletion □ Photochemical ozone formation □ Species richness</td>
<td>□ Human toxicity □ Ionizing radiation</td>
</tr>
<tr>
<td>□ Land use</td>
<td></td>
<td></td>
</tr>
<tr>
<td>□ Water depletion</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Please indicate the percentage of total products covered by the following Life Cycle Assessment approaches. The total sum should not exceed 100%.

<table>
<thead>
<tr>
<th>Life Cycle Assessment Approach</th>
<th>% of Total Products</th>
<th>Description of Assessment Approach</th>
</tr>
</thead>
<tbody>
<tr>
<td>Full LCAs</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Simplified LCAs</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other externally recognized tools (e.g. material flow accounting, ecological footprinting, MIPS)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total (should not exceed 100%)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Question-Specific Guidance & Definitions

Life Cycle Assessment (LCA) A systematic set of procedures for compiling and examining the inputs and outputs of materials and energy and the associated environmental impacts directly attributable to the functioning of a product or service system throughout its life cycle (ISO 14040). Generally, an LCA involves:

- Defining the goal and scope of the assessment
- Compiling an inventory of relevant inputs and outputs of a product system
- Evaluating the potential environmental and social impacts associated with these inputs and outputs
- Interpreting the results of the inventory analysis and impact assessment in relation to the objectives of the study

A simplified LCA screening LCA A simplified LCA is an adaptation of the full-scale quantitative LCA to facilitate easier integration into the product or service development process when time or data availability is a limiting factor. It does so either by reducing the scope of the study and/or by reducing data needs through the substitution of surrogates for data that may not be readily available to the practitioner. Simplified LCA applies the LCA method for a screening assessment (i.e. covering the whole life cycle) but may use generic data and standard modules (e.g. for energy production). This is followed by a simplified assessment that focuses on the most important environmental aspects and/or stages of the life cycle and a thorough assessment of the reliability of the results. Simplification of LCA consists of three stages:

- Screening: Identifying those parts of the system (life cycle) or of the elementary flows that are either important or have data gaps;
- Simplifying: Using the findings of the screening in order to focus further work on the important parts of the system or the elementary flows;
- Assessing reliability: Checking that simplifying does not significantly reduce the reliability of the overall result.

Other externally recognized environmental assessment tools This means a methodology for assessing environmental impact of products and services that is described in academic or industry literature. This includes tools developed internally that have since been adopted by the industry. For example:

- Material flow accounting: Similar to LCA in that it describes systems of material flows, but differs in focusing on the flows of a particular material within a region or an organization.
- Ecological footprinting: A method for assessing and illustrating environmental impact, typically more specialized than an LCA in focusing on toxic substances but can be combined with LCA or MFA to show the ecological footprint of a product or region.
- MIPS: Material intensity per unit of service (MIPS) studies product systems by describing the material input to the system to measure the eco-efficiency of a product or service.

References


Data Requirements

The total sum of all LCA approaches should not exceed 100%. Please note that if an LCA has been conducted for one product but is considered relevant for a broader product group, this can be considered in the coverage if specified in the comment box for the specification option.
4.3.3 Product Benefits

**Assessment Focus**

**Question Rationale**
The purpose of this question is to assess the extent to which your company's products provide benefits during the use phase. Resource Efficiency Benefits include decreased energy consumption, decreased water consumption, decreased waste generation, GHG emissions' reduction, pollution reduction, decreased raw material consumption, or increased product durability/longevity. Benefits should be beyond a small incremental improvement to a conventional product, instead they should illustrate that your products are more beneficial than mainstream standards and/or practice norms.

**Question Layout**
What percent of your products provide resource efficiency benefits during their use phase to your customers and consumers? Benefits include decreased energy consumption, decreased water consumption, decreased waste generation, GHG emissions' reduction, pollution reduction, decreased raw material consumption, or increased product durability/longevity. Please explain what and how much benefit is provided through the use of your products.

<table>
<thead>
<tr>
<th>% of Total Products</th>
<th>Description of benefits</th>
</tr>
</thead>
</table>

**Data Requirements**
Acceptance will be based upon an explanation of what and how much benefit your products provide. This can include a quantitative or qualitative measure, as long as it demonstrates a significant improvement.
4.3.4 Hazardous Substances

Assessment Focus

Question Rationale
The purpose of this question is to assess whether your company measures and monitors the risks of hazardous substances in your products. We ask about revenues from substances that are regulated by REACH because REACH is a strict, comprehensive, and widely adopted regulation with the aim to improve the protection of human health and the environment from the risks that can posed by chemicals. We also ask about the risk assessment conducted by companies to evaluate if companies are transparent with the risk assessment approach.

Question Layout
Please answer the following questions assessing your company's exposure to hazardous substances.

Please also note that this question refers to the whole company's product portfolio and it is not restricted to the products that could be potentially contain restricted substances or substances of very high concern (SVHC).

- Revenues from Hazardous Substances
  - What is the percentage of your company's products (in terms of revenues) containing restricted substances in the Annex XVII of REACH regulation?
    Percent: __________
  - What is the percentage of your company's products (in terms of revenues) containing substances of the Candidate List of substances of very high concern (SVHC) for Authorisation above 0.1% by weight?
    Percent: __________

Risk Assessment
- What percentage of your products (in terms of revenues) has undergone risk assessment for their potential impact on human health and the environment?
  Percent: __________
- Please provide a link publicly describing your risk assessment approach.
  Reference: __________
- We do not track this information
- Not applicable. Please provide explanations in the comment box below.
- Not known.

Question-Specific Guidance & Definitions

REACH REACH stands for Registration, Evaluation, Authorisation and Restriction of Chemicals. REACH is a regulation of the European Union, adopted to improve the protection of human health and the environment from the risks that can be posed by chemicals. It entered into force on 1 June 2007. REACH are applied to substance, mixture and article. REACH defines an article as an object which during production is given a special shape, surface or design that determines its function to a greater degree than its chemical composition. According to REACH, articles are for example clothing, flooring, furniture, jewellery, newspapers and plastic packaging.

To comply with the regulation, companies must identify and manage the risks linked to the substances they manufacture and market in the EU. They have to demonstrate to European Chemicals Agency (ECHA) how the substance can be safely used, and they must communicate the risk management measures to the users.
https://echa.europa.eu/regulations/reach/understanding-reach

Substances restricted under REACH The restricted substances (on their own, in a mixture or in an article) are substances for which manufacture, placing on the market or use is limited or banned in the European Union. The table prepared by the ECHA includes the restricted substances in the Annex XVII of the REACH Regulation and provides additional information related to the specific restriction entry.
**Data requirements**

Please also note that this question refers to the whole company's product portfolio and it is not restricted to the products that could be potentially contain restricted substances or substances of very high concern (SVHC).

Only companies that manufacture or import chemical substances below 1 tonne a year can mark "Not Applicable", as in such cases there is no need to register the substance.

Companies who need to register under REACH should not select "Not Applicable": According to European Chemical Agency the following companies need to register:

1. EU manufacturer or importer of substances on their own or in a mixture
2. EU producer or importer of articles meeting the criteria explained in the Guidance on requirements for substances in articles
3. "Only representative" established in the EU and appointed by a manufacturer, formulator or article producer established outside the EU to fulfil the registration obligations of importers
4.3.5 Commitment

Assessment Focus

Question Rationale
The purpose of this question is to assess whether the company has a strategy to reduce or phase out hazardous substances from its products. The description of the commitment should be specific to reducing the hazardous substances and general statements related to commitment to more sustainable products or green products will not be accepted for this question.

Question Layout
Does your company have a commitment to reduce or phase-out hazardous substances in its products? The commitment can be specific to particular products or substances, or general to your product portfolio.

- Yes, please indicate the following:

<table>
<thead>
<tr>
<th>Description of commitment:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Target year:</td>
<td></td>
</tr>
<tr>
<td>Progress achieved towards this target:</td>
<td></td>
</tr>
</tbody>
</table>

Question-Specific Guidance & Definitions
Examples of commitments could include:

- **Product portfolio-related** reduction in the number of products containing hazardous substances
- **Product-related** elimination or replacement of specific products
- **Substance-related** elimination of specific substances from products
4.3.6 End of Life Cycle Responsibility

Assessment Focus

Question Rationale
The integration of sustainable practices into new products’ development reflects an understanding of sustainability challenges and demonstrates a company’s ability to capitalize on market opportunities and minimize market risk at the product level. The objective of this question is to evaluate how effectively end-of-life considerations have been integrated into product design in practice, and how effective take-back programs are.

Question Layout
To what extent is your company actively and directly involved in product take back programs (e.g. disassembly, re-manufacturing, reuse or recycling of the product and its components)?

Please provide the proportion of total revenues generated by products that are reusable (i.e. for the same purpose) or recyclable (i.e. can be processed and reused in raw material or other product form). Please also indicate the proportion of these products taken back that are reused/re-manufactured, or recycled.

Materials incinerated for energy recovered are not considered reused or recycled.

- Reference Link

| Percentage of products sold last year that can be reused or recycled (if products are partly recyclable please estimate the proportion): |
| Percentage of total volume of products and materials taken back last year that were actually reused or recycled by your company, or by a third party you have directly contracted with for this activity (i.e. not disposed of as waste, or incinerated for energy recovery): |
| If your take back programs generate a financial benefit to the company, please quantify this benefit for all the take-back programs combined e.g. revenues generated and/or costs saved (leave blank or write 0 if take back programs only generate costs): |
| Currency: _________ |

Question-Specific Guidance & Definitions
Materials incinerated for energy recovered are not considered reused or recycled.

References
3RI Standard 301-3 is relevant for this question.
4.3.7 Environmental Labels and Declarations

Assessment Focus

Question Rationale

Increasingly, customers are demanding information regarding the sustainability of the products they purchase. The availability of such information is becoming an important factor in the buying decision process. An environmental product declaration is a transparent method for a company to communicate its commitment to sustainability to its customers through its products.

For business customers, understanding the environmental impact of sourced inputs enables the overall environmental footprint of products or processes to be measured and for a thorough life-cycle assessment to be conducted. Through this question we aim to assess the extent of coverage of environmental product declaration compared to the entire product portfolio.

Question Layout

Does your company provide product environmental declarations or other types of eco-labelling to customers? Please indicate the types of labeling below and attach supporting documents. Do not double count products with more than one label (e.g., products that are already counted under Type III should not also be included in Type I), the three figures should not exceed 100%.

Reference Link____________

<table>
<thead>
<tr>
<th>Environmental Labels and Declarations</th>
<th>% of Revenues Covered in FY 2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Type III Environmental Product Declarations (in accordance with ISO 14025 or the European construction standard EN 15804)</td>
<td></td>
</tr>
<tr>
<td>Type II self-declared environmental claims (in accordance with ISO 14021)</td>
<td></td>
</tr>
<tr>
<td>Type I or other ecolabels (in accordance with ISO 14024 or independent ecolabels e.g., WWF, national and international labels e.g., energy star, LEED, or accepted industry-specific best practices). Please specify standards or labels used: __________</td>
<td></td>
</tr>
<tr>
<td>Total (should not exceed 100%)</td>
<td></td>
</tr>
</tbody>
</table>

Question-Specific Guidance & Definitions

Environmental Product Declarations An independently verified and registered document that communicates transparent and comparable information about the life-cycle environmental impact of specific products.

The ISO 14020 family covers three types of labelling schemes:

- Type I is a voluntary label developed by a third party indicating overall environmental performance based on life cycle considerations;
- Type II is a self-declaration of environmental information by the producer;
- Type III is an eco-label with quantified environmental data awarded by a third party and based on verified full life-cycle assessment.

With Other standards (external) we refer to other types of recognized frameworks or eco-labelling systems.

References

- [https://www.globalecolabelling.net](https://www.globalecolabelling.net)

GRI Standard 417-1 is relevant for this question.
5. Social Dimension

5.1 Labor Practice Indicators

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

5.1.1 Diversity

**Partially public; additional credit will be granted for relevant publicly available evidence.**

**Assessment Focus**

![Assessment Focus Icon]

**Question Rationale**

We assess various Labor KPIs of an organization to determine not only the quality, but also transparency of its reporting on diversity issues. This question specifically assesses workforce diversity, and aims to assess the proportion of women in senior management relative to junior management and how the proportion of women changes as the management level and P&L responsibility increases. This is an indicator of a company’s ability to retain its top female talent from junior management up to senior management positions.

This question looks at the companies’ ability to disclose this data, as well as performance, with the performance aspect specifically considering companies’ ability to retain female talent. This is measured by comparing the proportion of junior female managers to the proportion of senior female managers.

**Question Layout**

Please complete the table and indicate which of the following indicators your company uses to monitor diversity-related issues and whether this information is publicly disclosed. Please provide figures covering the entire scope of the company and attach supporting evidence where indicated.

<table>
<thead>
<tr>
<th>Diversity Indicator</th>
<th>Percentage (0-100%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Female share of total workforce (%)</td>
<td>- - - Please indicate where this information is available in your public reporting</td>
</tr>
<tr>
<td>Females in all management positions, including junior, mid and senior management</td>
<td>- - - Please indicate where this information is available in your public reporting</td>
</tr>
<tr>
<td>Females in junior management positions, i.e. first level of management</td>
<td></td>
</tr>
<tr>
<td>Females in top management positions, i.e. maximum two levels away from the CEO</td>
<td></td>
</tr>
<tr>
<td>Females in management positions in revenue-generating functions (e.g. sales)</td>
<td></td>
</tr>
<tr>
<td>Breakdown of workforce based on other minority group(s), e.g. age, nationality,</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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Question-Specific Guidance & Definitions

The definitions provided below are guidelines that should be followed as closely as possible. If a different definition is used, this should be explained accordingly and a consistent definition should be used in any other questions that may require information about organizational structures.

Management positions This refers to all levels of management, including junior, middle and senior level management.

Junior management positions refer to first-line managers, junior managers and the lowest level of management within a company's management hierarchy. These individuals are typically responsible for directing and executing the day-to-day operational objectives of organizations, conveying the directions of higher level officials and managers to subordinate personnel.

Middle management positions refer to managers who head specific departments (such as accounting, marketing, production) or business units, or who serve as project managers in flat organizations. Middle managers are responsible for implementing the top management's policies and plans and typically have two management levels below them.

Top management positions refer to management positions with a reporting line at most two levels away from the CEO. They include individuals who plan, direct, and formulate policies, set strategy, and provide the overall direction of enterprises/organizations for the development and delivery of products or services, within the parameters approved by boards of directors or other governing bodies.

Revenue-generating functions refer to line management roles in departments such as sales, or that contribute directly to the output of products or services. It excludes support functions such as HR, IT, Legal. May also be referred to as roles that have P&L responsibility.

Data requirements:
In the section related to breakdown of workforce we consider aspects beyond gender breakdowns, such as employees from ethnic minorities or employees with disabilities. Expat assignments or employment by multinational firms are not considered.

Disclosure requirements for partially public question Additional credit will be granted for relevant publicly available evidence covering each of the following aspects of this question:

- Female share of total workforce (%)
- Females in management positions (as % of total management workforce)

References

The gender equality questions were developed in collaboration with EDGE Certified Foundation, leveraging its robust research on gender equality. The foundation focuses on global corporations as the key drivers for sustainable, positive change in business and society. EDGE (Economic Dividends for Gender Equality) is the leading assessment methodology and business certification standard for gender equality; it is designed to help organizations not only create an optimal workplace for women and men but also benefit from it. EDGE is working with more than 150 organizations in over 40 countries and 22 industries.

ILO convention No. 111

GRI Standards 102-8 & 405-1 are relevant for this question
5.1.2 Equal Remuneration

Assessment Focus

Question Rationale
We assess various Labor KPIs at an organization to determine the quality and transparency of its reporting. This question looks at whether remuneration is equal between the female and male workforce at different management levels. This question looks at disclosure of salaries for men and women at different levels of responsibility, and performance, with the performance aspect specifically considering the relative base salaries of male and female managers and the relative base salaries plus incentives for male and female managers. The rationale for this is that base salaries are generally regulated by law, and any differences could be explained by factors other than gender (such as experience, responsibilities, education, etc.), but the relative difference would not be expected to increase significantly when adding on the more subjective incentives and bonuses.

Question Layout
Please provide information on the following indicators relating to equal remuneration.

<table>
<thead>
<tr>
<th>Employee Level</th>
<th>Average female salary</th>
<th>Average male salary</th>
<th>Ratio (= Average Female Salary/Average Male Salary)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive level (base salary only)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Management level (base salary only)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Management level (base salary + other cash incentives)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non-management level</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Question-Specific Guidance & Definitions

Management Level: all management level positions from first-line/junior managers up to top/senior managers with a reporting line 2 levels or less from the CEO but not executive level positions

Non-Management Level: production and administrative positions.

The gender equality section was developed in collaboration with the EDGE Certified Foundation, a Swiss foundation focusing on fostering gender equal workplaces through a global certification system in gender equality. The foundation focuses on global corporations as the key drivers for sustainable, positive change in business and society.
5.1.3 Freedom of Association

**Assessment Focus**

**Question Rationale**
We assess various Labor KPIs at an organization to determine the quality and transparency of its reporting. In line with ILO Convention No. 87 and No. 98, this question assesses if your company allows employees to join an independent trade union.

**Question Layout**
What percent of your total number of employees are represented by an independent trade union or covered by collective bargaining agreements? Please provide a link if this information is publicly available.

<table>
<thead>
<tr>
<th>% of employees represented by an independent trade union or covered by collective bargaining agreements</th>
<th>Link to public reporting</th>
</tr>
</thead>
</table>

**Question-Specific Guidance & Definitions**

Key definition:

**Collective bargaining agreements** are binding collective bargaining agreements include those signed by the organization itself or by employer organizations of which it is a member. These agreements can be at the sector, national, regional, organizational, or workplace level.

**Data requirements**

**Percentage of employees covered by collective bargaining agreements** Employees who are eligible but are not actually covered by collective bargaining agreements should be excluded from the count.

Disclosure requirements for partially public question: Additional credit will be granted for relevant publicly available evidence covering each of the following aspects of this question:

- Percentage of employees covered by an independent trade union or collective bargaining agreements

**References**

GRI Standards 102-41 & 407-1 are relevant for this question.
5.2 Human Rights

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

5.2.1 Human Rights – Commitment

Public: this question requires publicly available information.

Assessment Focus

Question Rationale

The purpose of this question is to identify companies that have an active commitment to respect and protect human rights in their business relationships in line with the UN guiding principles or another internationally accepted standard. The policy needs to be company specific with a company-wide commitment and not just for a single site, business unit, or project.

Only referring to or being a signatory to external entities such as the UN Global Compact (UNGc) or International Labour Organization (ILO) is not sufficient. A letter from your company to the UNGc is also not sufficient.

Question Layout

Do you have a publicly available, company-specific policy in place for your commitment to respect human rights in accordance with the UN Guiding Principles on Business and Human Rights or other internationally accepted standards? Please indicate where this information is available in your public reporting or corporate website.

- Yes. We have a publicly available policy for our commitments to human rights. The policy covers the following: [multiple options can be selected]
  - A statement of commitment to respect human rights in accordance with internationally accepted standards
  - Expectations in our own operations (employees, direct activities, products or services)
  - Requirements of our suppliers
  - Requirements of our partners
  - Actions and procedures we undertake to meet our commitment

Question-Specific Guidance & Definitions

We apply the definitions provided in the UN Guiding Principle on Business and Human Rights and GRI.

Respecting human rights:
- Avoid causing or contributing to adverse human rights impacts through their own activities, and address such impacts when they occur.
- Seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.

Suppliers: Include brokers, consultants, contractors, distributors, franchisees or licensees, home workers, independent contractors, manufacturers, primary producers, sub-contractors and wholesalers.

Partners: Include agents, lobbyists and other intermediaries, joint venture and consortia partners, governments, customers, clients, local communities.

References
5.2.2 Human Rights – Due Diligence Process

Supporting evidence is required for part of this question

Assessment Focus

Question Rationale

The purpose of this question is to assess whether your company has a due diligence process to proactively and systematically identify what potential issues and where they could occur. Here we ask how risks are identified and periodically reviewed.

The outcomes of conducting the analysis should be provided in the following “Human Rights -Assessment” question. A passive approach such as a whistle blowing or confidential reporting system is not sufficient for this question.

Question Layout

Has your company developed a due diligence process to proactively identify and assess potential impacts and risks relating to respecting human rights?

- Yes, and our process covers the following. Please provide supporting evidence of a risk mapping or other form of assessment to identify areas of potential risk:
  - Risk identification (usually in the form of risk mapping)
  - Identification of where potential human rights issues could occur in our own operations
  - Identification of where potential human rights issues could occur in our value chain or activities related to our business
  - Identification of what actual or potential human rights issues could be of concern
  - Systematic periodic review of the risk mapping of potential issues
- We are developing a process, but we have not yet conducted any assessments. Please provide information indicating the status and expected completion date.

Question-Specific Guidance & Definitions

Adverse human rights impact An “adverse human rights impact” occurs when an action removes or reduces the ability of an individual to enjoy his or her human rights.

Due diligence process an ongoing management process that a reasonable and prudent enterprise needs to undertake, in the light of its circumstances (including sector, operating context, size and similar factors) to meet its responsibility to respect human rights.

Data requirements

Supporting evidence should be recent, provide a clear description of the due diligence process, indicate the coverage of business activities and demonstrate it is an ongoing activity.

References


GRI Standard 406-1 is relevant for this question
5.2.3 Human Rights – Assessment

Supporting evidence is required for part of this question.

Assessment Focus

Question Rationale

The purpose of this question is to assess the extent your company is proactively identifying where risks are and managing them. The process should consider the country contexts in which the organization operates, the potential and actual human rights impacts resulting from the organization’s activities, and the relationships connected to those activities.


Question Layout

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

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

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

For the basis of reporting, please provide the denominator used to calculate the extent of your assessment of your own operations, suppliers, and joint ventures. Please see the information button for definitions and examples.

<table>
<thead>
<tr>
<th>Category</th>
<th>A. % of total assessed in last 3 years</th>
<th>B. % of total assessed (column A) where risks have been identified</th>
<th>C. % of risk (column B) with mitigation or remediation process implemented</th>
<th>D. Basis for reporting % (denominator, e.g. costs, FTEs, number of suppliers)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Own Operations (including Joint Ventures where the company has management control)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>⊗ Not relevant</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Contractors and Tier I Suppliers</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>⊗ Not relevant</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Joint Ventures with no management control</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>⊗ Not relevant</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Which groups have been specifically assessed? Check all that apply and provide reference for each tick box.

- Own employees
- Children
- Indigenous people
- Migrant labor
- Third-party contracted labor
- Local communities
- Others, please specify
Question-Specific Guidance & Definitions

**Own Operations** includes direct activities, own employees, own sites, own products/services, and joint ventures where management has control.

**Contractors and Tier 1 Suppliers** include brokers, consultants, contractors, distributors, franchisees or licensees, home workers, independent contractors, manufacturers, primary producers, sub-contractors and wholesalers.

**Joint ventures with no management control** all joint ventures not included in Own Operations as defined above.

**Percentage of suppliers assessed in the last 3 years** This refers to the number of entities across the different categories of business activities that have been assessed in the last three years, divided by the total absolute number of entities within the different categories of business activities in the current year. *If an entity has been assessed multiple times in the last three years, it should only be counted once.*

**Indigenous people** generally refers to descendants of pre-colonial or pre-settler societies and include but is not limited to First People, Native American, First Nations, Aboriginal People. Characteristics include:

- Self-identification as indigenous
- Historical continuity with pre-colonial and/or pre-settler societies
- A common experience of colonialism and oppression
- Occupation of, or strong links with, specific territories
- Distinct social, economic and political systems
- Distinct language, culture and beliefs from dominant sectors of society
- Resolved to maintain and reproduce their ancestral environments and distinctive identities

**Source** ICMM Indigenous Peoples and Mining Good Practice Guide 2016

**Data requirements:**
Supporting evidence should be recent, provide a clear description of the assessment status for the past 3 years.

**References**

- GRI Standards 411-1 and 412-1 are relevant for this question.
5.2.4 Human Rights – Disclosure

Public: this question requires publicly available information.

Assessment Focus

Question Rationale
The purpose of this question is to assess the extent to which companies are publicly disclosing their human rights efforts. We are looking for the following evidence in the public domain:

- The process to identify and mitigate risks
- The number of sites with mitigation plans in place
- The main human rights issues, vulnerable groups identified
- Remediation actions taken

Question Layout
Does your company publicly disclose its commitments and the status of its human rights assessment? The following is publicly available:

- Yes, our company publicly reports on our human rights commitments. The following are publicly available:
  - Process to identify and mitigate risks
  - The number of sites with mitigation plans
  - The main issues and vulnerable groups identified
  - Remediation actions taken

Data Requirements
Copy of, or link to: Company website, annual report, sustainability report, other public communication Human Rights – Disclosure.
5.3 Human Capital Development

Human capital development not only ensures that the company has the appropriate skill set to execute the business strategy, but also improves talent attraction and retention, and employee motivation; and, as a result, productivity and the potential for innovation. In increasingly knowledge-based industries, intellectual capital is also an important part of a company’s intangible assets. Human and intellectual capital is maintained and improved by integrating knowledge management systems and implementing procedures for organizational learning. Our questions assess whether the company has a comprehensive approach to identifying skill gaps, measuring human capital management, and developing systems to share knowledge across the company.

5.3.1 Training & Development Inputs

Assessment Focus

Question Rationale

For many industries, human capital development is one of the most financially material sustainability factors. The quality of employees that companies are able to attract and retain differentiates those that are well positioned to succeed in their respective industries from those that are not, so strong human capital development practices are considered an important source of competitive advantage. This question assesses whether companies track their investments in employee development.

Question Layout

Please provide the following data related to training, development and internal mobility for the last fiscal year and indicate the percentage of global employees that this data represents. Training hours and training costs should include activities related to further development of employee skills but should not include e.g. basic compliance training.

- Please indicate the data coverage of the reported data:

<table>
<thead>
<tr>
<th></th>
<th>FY 2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Average hours per FTE of training and development</td>
<td></td>
</tr>
<tr>
<td>Average amount spent per FTE on training and development. Currency: ______</td>
<td></td>
</tr>
<tr>
<td>Percentage of open positions filled by internal candidates</td>
<td></td>
</tr>
</tbody>
</table>

Question-Specific Guidance & Definitions

FTEs (Full-Time Equivalents) is the number of working hours that represent one full-time employee during a fixed time period, such as one month or one year. The concept is used to convert the hours worked by several part-time employees into the hours worked by full-time employees.

Average hours of training and development per FTE refers to the total number of hours of training and development provided in the last fiscal year divided by the total number of FTEs.

Average amount spent on training and development per FTE refers to the total amount spent on development in the last fiscal year divided by the total number of FTEs.

Percentage of open positions filled by internal candidates refers to the total number of open positions filled by a company’s own employees divided by the total number of vacancies in the company in the last fiscal year. This metric provides a means of determining the effectiveness of human capital development by providing employees with the skills required for promotion, and it also demonstrates how proactive organizations are in providing their employees with new challenges for growth and development throughout their careers.

References

GRI Standard 404-1 is relevant for this question.
5.3.2 Employee Development Programs

Assessment Focus

Question Rationale

One of the challenges for both businesses and investors is to fully understand the positive business and financial effects of investing in employees. This question measures how and to what degree companies are able to measure the benefits to their business of their investments in human capital by describing two examples of employee development programs, demonstrating their benefits to the business and asking whether companies are able to quantify these benefits.

Question Layout

Please discuss two of your company’s employee development programs that have been designed to upgrade and improve your employees’ skills. Provide a brief description of the business benefits of each program and, where possible, provide a quantitative measure of the positive impact these programs have had on your business (e.g. increase in employee engagement, improved productivity, cost reduction or revenue generation).

<table>
<thead>
<tr>
<th>Employee Development Program; please specify two different examples</th>
<th>Description of business benefits:</th>
<th>Quantitative impact of business benefits (monetary or non-monetary):</th>
<th>% of FTEs that participated in this program</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Question-Specific Guidance & Definitions

Employee development programs refers to programs that have specifically been developed to improve your employees’ skills. Programs providing employees with the basic skills they need to carry out their daily work, language skills, or mandatory compliance or basic occupational health and safety training should not be described.

Examples of programs that are acceptable to discuss here include, but are not limited to, leadership or management development programs, young talent development programs, sales training for sales executives, advanced occupational health and safety training, green or black belt certifications and project management training.

Examples of programs that are not considered as skill development include online programs or classroom training programs to help employees reach certain minimum requirements, such as online compliance training, health and safety training, board training for new board members, training programs that are necessary to bring new employees up to a minimum standard in order to fulfill their job requirements, graduate programs or trainee programs.

The description of business benefits should state the benefits that the company derives from providing the training, not the benefits to the employee undertaking the training. This should not be a description of the employee development program but rather a consideration of how the program helps the company’s overall performance or helps it meet its strategic targets.

Quantitative impact of business benefits refers to either monetary or non-monetary metrics. Examples include employee engagement, decreased staff turnover, efficiency gains, output gains, revenue generation, and cost savings. These metrics should be directly linked to the employee development program described in terms of a measurable outcome as a relevant indicator of more effective business performance.

References

GRI Standard 404-2 is relevant for this question.
5.3.3 Human Capital Return on Investment

Assessment Focus

Question Rationale

The Human Capital Return on Investment provides a means of measuring your company’s profitability in relation to total employee costs. It is derived by removing non-employee costs from overall operating costs and deriving the resulting operating profitability.

This metric provides a view into the degree to which economic value is derived looking at profitability solely in relation to human capital costs.

Question Layout

Please provide the following information on a standard Human Capital Return on Investment metric that serves as a global measure of the return on your human capital programs.

<table>
<thead>
<tr>
<th></th>
<th>FY 2015</th>
<th>FY 2016</th>
<th>FY 2017</th>
<th>FY 2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Total Revenue, as specified in the &quot;Denominator&quot; question</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Currency:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b) Total Operating Expenses, please specify currency:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>c) Total employee-related expenses (salaries + benefits), please specify currency:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Resulting HC ROI (a - (b-c))/c</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total FTEs, as specified in the &quot;Denominator&quot; question</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Question-Specific Guidance & Definitions

By subtracting Total Operating Expenses (b) less Total employee-related expenses (salaries + benefits) (c) from Total Revenue (a), your company’s profitability prior to human capital costs are calculated. Dividing this figure by Total employee-related expenses (salaries + benefits) (c) then leads to the ratio that examines your company’s level of profitability in relation to the total human capital expenses.

Operating expenses should be in line with accepted financial accounting and reporting standards including everything a company will have defined in their income statement.

Total Revenue the amount your company has received in revenues before any deductions are made. Total operating expenses are all the expenses your company has from its operations.

Please note that Total employee-related expenses (salaries + benefits) includes training and development programs, pensions, hiring, etc., as it covers all costs directly related to employees. This is an example of how return on investments in human capital can be calculated based on standard financial metrics. If you use another approach, this can be indicated in the previous question.

References

3RI Standard 201-1 is relevant for this question.
5.3.4 Return on Employee Development Investment

Supporting evidence is required for this question.

Assessment Focus

Question Rationale

While it is now common knowledge that investments in employee development and training provide valuable benefits in terms of productivity, quality and employee retention and satisfaction, companies are now faced with decisions about where to invest their valuable training and development budgets.

This question examines how companies measure the benefits of their investments in employee development, providing more granular insight into the benefits achieved through investments in training, education and incentive programs in order for companies to see if their investments are generating reasonable benefits over time.

Question Layout

Does your company have a global metric to quantitatively measure the benefits from your investments in employee development programs?

By investment in employee development programs, we mean expenses related to education, training, incentive programs, etc. This does not include base salary or standard benefits (e.g. vacation, insurance, etc.)

By return on employee development investment, we especially mean the increase in profits, savings or changes in other metrics such as employee engagement, employee retention, absenteeism per monetary unit spent (e.g. USD 1 million) on employee development programs.

The metric used in 3.4.3 Human Capital Return on Investment is not accepted here.

- Yes, we have a metric for calculating the business benefits of our investments in human capital factors. Please select the approach that best describes your measurement of this return on investment and provide supporting evidence. Please describe the specific metric used, including the specific training costs associated with the corresponding return measurement.

- We use a third-party methodology (e.g., the Kirkpatrick Model, Level 3 Behavior or Level 4 Results) to identify the value of training to our business and resulting ROI. Please specify the return metric used as a result of applying this methodology:

Metric

Please provide the value of the metric used to measure the return on your employee development investments:

<table>
<thead>
<tr>
<th>FY 2015</th>
<th>FY 2016</th>
<th>FY 2017</th>
<th>FY 2018</th>
</tr>
</thead>
</table>

- We can estimate the improvements in employee turnover or employee engagement per monetary unit spent (e.g. USD 1 million) on training and employee development programs. Please specify:

Metric

Please provide the value of the metric used to measure the return on your employee development investments:

<table>
<thead>
<tr>
<th>FY 2015</th>
<th>FY 2016</th>
<th>FY 2017</th>
<th>FY 2018</th>
</tr>
</thead>
</table>

- We can estimate the cost savings per monetary unit spent (e.g. USD 1 million) on specific training programs (e.g. World Class Manufacturing, Six Sigma, Health & Safety Programs). Please specify:

Metric

Please provide the value of the metric used to measure the return on your employee development investments:

<table>
<thead>
<tr>
<th>FY 2015</th>
<th>FY 2016</th>
<th>FY 2017</th>
<th>FY 2018</th>
</tr>
</thead>
</table>
We can estimate the increase in sales or the changes in our company’s profitability per monetary unit spent (e.g., USD 1 million) on specific training and employee development programs (such as sales training). Please specify:

Metric
Please provide the value of the metric used to measure the return on your employee development investments:

<table>
<thead>
<tr>
<th>FY 2015</th>
<th>FY 2016</th>
<th>FY 2017</th>
<th>FY 2018</th>
</tr>
</thead>
</table>

Question-Specific Guidance & Definitions

Please explain how your company is able to determine the quantitative benefits achieved by your investments in employee development programs.

By employee development program investments, we mean expenses related to education, training, incentive programs, etc. This does not include salary or benefits.

By quantitative benefits, we mean either monetary benefits such as increases in sales, increases in profits or profitability, World Class Manufacturing (WCM) savings, etc. directly related to the programs, or changes in other metrics such as employee engagement, employee retention, absenteeism, etc.

If your company is currently developing a means of measuring the economic benefits of its employee development investments, please describe the approach that is currently being developed and how it will provide a clear indication of the link between the investments and their quantitative benefits.

Examples:

- **Training ROI** Increase in Profits divided by Training Costs
- **Sales Impact** Increase in Sales divided by Investment in Employee Development Investments
5.4 Talent Attraction & Retention

Successful Talent Attraction & Retention management enables companies to maintain their competitive advantage and to execute their corporate strategies. Companies should develop and implement an appropriate and well-balanced compensation framework for all employee categories, adopting compensation plans that incorporate both fixed and variable components. Furthermore, the variable compensation should be balanced with respect to time horizon on all employee levels. Our questions assess whether the company has a comprehensive approach and system to reward employees across all categories on the basis of company-wide and individual performance metrics.

5.4.1 Type of Individual Performance Appraisal

Assessment Focus

Question Rationale

In this question, we assess the various tools that companies use to measure individuals’ performance and to what extent these tools are applied throughout the organization.

Question Layout

Please indicate the type and employee coverage of the individual performance appraisals used for individual performance-related compensation.

<table>
<thead>
<tr>
<th>Type of Performance Appraisal</th>
<th>% of all employees</th>
</tr>
</thead>
<tbody>
<tr>
<td>Management by objectives: systematic use of agreed measurable targets by line superior</td>
<td></td>
</tr>
<tr>
<td>Multidimensional performance appraisal (e.g., 360 degree feedback)</td>
<td></td>
</tr>
<tr>
<td>Formal comparative ranking of employees within one employee categories</td>
<td></td>
</tr>
</tbody>
</table>

Question-Specific Guidance & Definitions

Please note that multiple options might be valid for some employees, so the sum of all options doesn’t need to add up to 100%.

Management by objectives refers to a process in which employees have pre-defined and measurable goals that are set on at least a yearly basis together with their line manager and systematically followed up on.

Multidimensional performance appraisal refers to a system in which the employee's performance is formally evaluated not just by their direct line manager, but also by their peers, direct reports, and other employees, providing what is referred to as a “360 degree” view of the employee’s performance.

A formal comparative ranking refers to a system in which employees are systematically graded relative to their peers in the same group (for example within the team performing a particular function).

References

GRI Standard 404-3 is relevant for this question.
5.4.2 Long-Term Incentives

Supporting evidence is required for this question.

Assessment Focus

Question Rationale

Long-term incentive programs can be essential for companies to retain well-qualified employees over time. Such programs serve to orient key decisions throughout the organization around longer-term goals and strategic objectives, giving companies a greater likelihood of success over time.

This question assesses the long-term incentive programs the company has in place, the timeframe for which performance incentives are paid out, the extent to which these programs apply to employees across the organization, and the extent to which they are associated with sustainability principles.

Question Layout

Does your company provide long-term incentives for employees below the senior management level? Long-term incentive programs are programs with a performance period longer than one year.

Please note: senior management includes employees that are at most two management levels from the CEO (or equivalent). Below senior management level refers to all employees that are more than two management levels away from the CEO. If your company uses a different definition for "below senior management level" please provide the definition in your answer.

Long-term incentives for the executive management and/or senior management are not accepted in this question.

<table>
<thead>
<tr>
<th>Please describe the following aspects (both):</th>
<th>Our long-term incentives for employees below the senior management level are on average paid out after:</th>
<th>Please report the percentage of your workforce below senior management level (max. two levels from the CEO) that this program applies to:</th>
<th>Do the long-term incentives include targets associated with sustainability performance? Please explain in the comment box below:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1) the type of long-term incentive program (e.g., stock options, restricted stock units, cash incentives, etc.);</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2) the type of employees below the senior management level the program applies to:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>o 2 years</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>o 3 years</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>o Longer than 3 years</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Question-Specific Guidance & Definitions

**Long-term incentives:** Any form of variable compensation that is paid out over a time period longer than one year. This can include deferred cash bonuses, stock options and restricted stock units. Pension contributions should not be included as these are not considered to be bonus programs or variable compensation. If your company uses different pay-out time periods for different employee categories, please use a weighted average of the pay-out time periods for your long-term incentive programs.

**Sustainability performance:** It can relate to any sustainability goals set by your company, whether they are related to environmental issues, social issues such as occupational health and safety, or any other sustainability issue defined as material by your company.

**Senior management level** refers to employees that are within two levels of the CEO as a maximum. "Employees below senior management" thus refers to all employees that are below the "senior management level". Please note that the definition of "senior management level" is up to the company as we allow the company to choose the best definition according to its business plan and company structure. If your definition differs from our definition due to your business model, please explain this in the question.

Data Requirements

**Average time period for performance** the average pay-out time period on which these incentive programs are based. If different pay-out time periods are used for different employee categories, please use a weighted average of the pay-out time periods for long-term incentive programs that exist.

Percentage of your workforce below senior management level (max. two levels from the CEO) refers to the percentage of employees that are not considered senior management that are part of the long-term incentives program. For example, if your company has 100 employees, 10 are senior management (a maximum of two level from the CEO in the organizational structure) and 10 employees below senior management are part of the long-term incentives program, then 11% (=10/90*100) of employees below senior management level are covered in the program. Long-term incentives for executive management and/or senior management are not accepted in this question.
5.4.3 Employee Turnover Rate

Assessment Focus

Question Rationale

Human capital is one of the main drivers of corporate growth and plays an essential role in the successful execution of companies’ strategies. The employee turnover rate is, therefore, a highly significant management KPI that reflects the ability of a company to retain its employees.

Question Layout

Please indicate your company’s total and voluntary turnover rates for the last four years as a percentage of total number of employees in the table below. Please also indicate the average hiring cost/FTE for the last fiscal year.

<table>
<thead>
<tr>
<th></th>
<th>FY 2014</th>
<th>FY 2015</th>
<th>FY 2016</th>
<th>FY 2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total employee turnover rate</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Voluntary employee turnover rate</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Please indicate your company’s average hiring cost/FTE in the last fiscal year. This should specifically relate to the number of employees hired last year, not average cost for all employees and specify currency...

Question-Specific Guidance & Definitions

**Total employee turnover** refers to the proportion of employees who leave an organization over a set period (often a year), expressed as a percentage of the total workforce. The term encompasses all leavers, whether they have left voluntarily or due to dismissal, retirement, or death in service. The figure should be calculated using the total number of employees at the end of the reporting period.

**Voluntary employee turnover** refers to the proportion of employees who choose to leave an organization over a set period (often a year), expressed as a percentage of the total workforce. The figure should be calculated using the total number of employees at the end of the reporting period.

The average cost of hiring a full-time employee refers to the average cost of hiring a new employee to the company in the last fiscal year. The figure should be calculated based on the costs of hiring all new full-time employees in the reporting period (not based on the costs of hiring full-time employees who were already at the company before the last fiscal year started).

References

GRI Standard 401-1 is relevant for this question.
5.4.4 Trend of Employee Engagement

**Assessment Focus**

**Question Rationale**

Internal employee engagement surveys are a crucial tool for developing policies to attract, retain and develop the best employees. It is essential that companies collect and measure feedback from employees, who are valuable assets of the company as well as significant stakeholders in it. In this question we determine whether companies conduct regular engagement surveys of their employees and analyze the results of these surveys. Opinions about the company, the work-place and overall feedback can be very different depending on the employee responding. Differences can also be found between different employee groups or between men and women. The question also aims to assess whether companies are able to break down the results of their internal engagement surveys by gender, allowing them to understand differences of opinion and address potential issues.

**Question Layout**

Please indicate in the following table the percentage of actively engaged employees based on your company’s scaled employee engagement surveys. Please also indicate the coverage of these surveys and if this measurement can be broken down according to gender. For each row in the table, it is mandatory that the values provided are in the same unit.

If your company only conducts an Employee Engagement survey every two years, please duplicate the value of the previous year in the table and provide the target for the most recent year a survey was conducted.

- **STANDARD METHOD** – Please refer to the information button for a description of the methodology.

<table>
<thead>
<tr>
<th>Employee engagement</th>
<th>Unit</th>
<th>FY 2014</th>
<th>FY 2015</th>
<th>FY 2016</th>
<th>FY 2017</th>
<th>What was your target for FY 2017?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employee engagement</td>
<td>% of actively engaged employees</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Data coverage</td>
<td>% of total employees</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**PUBLIC REPORTING**

- The results of our employee engagement surveys are publicly available. Please provide supporting evidence or web link.

**SURVEY METHODOLOGY**

Please provide a definition of the company’s approach to measuring employee engagement: ________________________.

Please provide the scale or options used in the survey (e.g. 5 point scale: *actively engaged*, *disengaged*, "strongly agree", "agree", "don’t know", "disagree", "strongly agree"). ________________________

**GENDER BREAKDOWN**

- We are able to break down the results of the employee engagement surveys based on gender. Please attach supporting evidence. __________

**ALTERNATIVE METHOD** - We use another method to measure employee engagement or satisfaction. Please specify the method and attach supporting evidence.

<table>
<thead>
<tr>
<th>Please describe the method:</th>
<th>Please describe the unit used:</th>
<th>FY 2014</th>
<th>FY 2015</th>
<th>FY 2016</th>
<th>FY 2017</th>
<th>What was your target for FY 2017?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Data coverage</td>
<td>% of total employees</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**Question-Specific Guidance & Definitions**

Engagement: definitions of employee engagement may vary, but the following are representative:

- **Gallup** Those who are involved in, enthusiastic about, and committed to their work and workplace.
- **Utrecht Work Engagement Scale (UWES-9)** “A positive, fulfilling, work-related state of mind that is characterized by vigor, dedication, and absorption.”
- **Grovo** “A deep, personal, and empowered investment in work.” Deep because the employee cares about the quality of their work. Personal because the work and its contribution to the success of company matters to the employee. And empowered because “the employee is capable of delivering a quality that will reward their investment of time, talents, effort, and care.”

Our Methodology for measuring Employee Engagement:

% of actively engaged employees is the percentage of employees who reported that they feel “actively engaged” or simply “engaged” as opposed to “not engaged”, “passive”, or “actively disengaged” out of the total number of employees who participated in the survey. Source: SASB

**Actively engaged** The classification should generally reflect the use of 4, 5, 7, or 10 point scales, where “actively engaged” is 3-4 on a 4 point scale, 4-5 on a 5 point scale, 5-7 on a 7 point scale, and 7-10 on a 10 point scale, or the equivalent. Sources: The Vitality Institute and Aon Hewitt.

**Determining who is actively engaged** Engagement is generally determined through a composite score derived from several questions, however it may also be determined with a single question about “overall” engagement. Whatever the case, the result should be provided in a scale that corresponds to the above definitions of “actively engaged”.

Examples of scoring systems:

**5 point scale**, where 4-5 are considered “actively engaged”:

1. Not engaged
2. Somewhat disengaged
3. Passive
4. Somewhat engaged
5. Highly engaged

**Aon Hewitt** uses the following four categories, where 3-4 are considered “actively engaged”:

1. Actively disengaged
2. Passive
3. Moderately engaged
4. Highly engaged

Examples of Engagement Evaluation Aspects (5 point scale: Strongly Agree, Agree, Neutral, Disagree, Strongly Disagree):

- I understand the strategy and goals of the company
- I understand how my work contributes to the company achieving these goals
- I am proud to work for the company
- I am excited and inspired to come to work most days
- I have the feedback I need to succeed in my role.

**% of total employees** refers to the percentage of employees who participated in the employee engagement survey out of the total number of employees.

**Target** Targets can be the precise, stated target for the year in which the survey was conducted, or if the target is long-term for a specific future year, it can be linearly extrapolated. For instance, if the company reported 70% of employees were actively engaged in FY2015, and set a two-year target of reaching 80% by FY2017, the linearly extrapolated target for FY2016 would be 75% (e.g. 10% improvement divided by two years equals 5% per year).

Other methodologies for measuring employee engagement companies may provide employee satisfaction instead of employee engagement, another measure if their scale for engagement cannot be translated into the method described above, or any other similar metric.

**Unit** to be described by the company in the text box provided.

**% of total employees** refers to the percentage of employees who participated in the employee engagement survey out of the total number of employees.
5.5 Corporate Citizenship & Philanthropy

In order to be a catalyst for development, corporate philanthropy programs need to be managed well. Creating value for both beneficiaries and shareholders requires companies to have a clear direction and focus for guiding their philanthropic activities as well as for measuring their effectiveness from a cost/benefit perspective. The key focus of the criterion is on how companies assess the value of their corporate citizenship and philanthropy programs and how their programs align with the UN Sustainable Development Goals.

5.5.1 Group-Wide Strategy

**Supporting evidence is required for this question.**

**Assessment Focus**

**Question Rationale**

In order to be a catalyst for development, corporate philanthropy programs must be managed well. Creating value for the beneficiaries of these programs and shareholders alike requires companies to have a clear direction and focus guiding their philanthropic activities. We aim to find out whether a company has a group-wide corporate citizenship/philanthropy strategy in place, its main priorities, and if these priorities are aligned with the UN Sustainable Development Goals and the company’s business drivers. Programs and initiatives that are aligned with the company’s business drivers will allow the company to leverage its strengths, its brand and its employees to have the maximum impact on beneficiaries.

Creating value for beneficiaries and shareholders alike requires companies to have the ability to measure the effectiveness of their philanthropic activities from a cost/benefit perspective. Companies should have management processes in place to measure the impact of its activities and thus be able to use cost-benefit analysis to guide future spending decisions. The existence of group-wide KPIs to measure the effectiveness of philanthropic activities acts as an indicator of robust management processes.

**Question Layout**

Does your company have a group-wide strategy that provides guidance to your corporate citizenship/philanthropic activities? Please indicate how this strategy aligns with your overall corporate strategy and the 17 UN Sustainable Development Goals.

- Group-wide Strategy
  Please specify and provide supporting evidence:

**Priorities & KPIs**

Please indicate the three main priorities as outlined in your group-wide corporate citizenship/philanthropy strategy specified above. For each priority, please indicate which UN Sustainable Development Goal the priority is aligned with. Furthermore, please provide a short description of how the priority is aligned with your business drivers and attach supporting evidence. In addition, please indicate which KPIs your company uses to measure the benefits of the three main priorities and provide a reference to where the KPIs are reported in the public domain. The KPIs need to be measurable, but you do not need to provide quantitative results. Please clearly describe the benefit KPIs as well as the activity in the provided text boxes.

<table>
<thead>
<tr>
<th>Priorities and SDG alignment</th>
<th>Description of alignment between priority and your business drivers. Please provide supporting evidence.</th>
<th>Business Benefit KPI</th>
<th>Social/Environmental Benefit KPI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Priority 1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Priority 2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Priority 3</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Question-Specific Guidance & Definitions

Components that we are looking for in your group-wide strategy:

- Alignment of community strategy with core business needs and issues
- Clear objectives, focus areas and priorities
- Targets for the next 3-5 years
- A clear governance structure for managing corporate citizenship and community activities
- Effective communication of the approach and its performance to relevant stakeholder groups

Alignment with business drivers refers to a clear connection between the focus of group-wide corporate citizenship/philanthropic activities and the company’s business drivers. For example: if expanding your business presence in an emerging market, or a significant proportion of your company’s existing customers are already located in emerging markets; your top priority corporate citizenship/philanthropic activities might be related to increasing the local standard of living by improving access to basic services (water, sanitation, electricity), improving the education system or improving hygiene, i.e. tackling social and environmental issues important in these markets.

Business drivers/KPIs they may include, but are not limited to, product or business development, local development, reputation/branding, human capital development and access to talent.

Social/Environmental Benefit KPIs should be aligned with generally accepted social/environmental goals like the Sustainable Development Goals, Social Progress Index or similar.

References

- http://www.socialprogressimperative.org/
5.5.2 Type of Philanthropic Activities

Assessment Focus

Question Rationale
In order to be a catalyst for development, corporate philanthropy programs need to be well managed. Creating value for beneficiaries and shareholders alike requires companies to have a clear direction and focus guiding their philanthropic activities. This question aims to assess the structure and diversity of companies’ corporate citizenship programs.

Question Layout
For the last fiscal year, please indicate on a consolidated group-wide basis what percentage of your corporate citizenship and/or philanthropic contributions falls within each category. Please refer to the information button for definitions and explanations of the categories.

<table>
<thead>
<tr>
<th>Category</th>
<th>Percentage of Total Costs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Charitable donations</td>
<td></td>
</tr>
<tr>
<td>Community investments</td>
<td></td>
</tr>
<tr>
<td>Commercial initiatives</td>
<td></td>
</tr>
<tr>
<td>Total must equal</td>
<td>100%</td>
</tr>
</tbody>
</table>

Question-Specific Guidance & Definitions
The categories in this question follow the London Benchmarking Group (LBG) model. The sum of the figures for each category should add up to 100%. If your company uses different categories, you should make estimates to fill in the three categories in the table based on the detailed definitions below.

Charitable donations refers to one-off or occasional support to good causes in response to the needs and appeals of charitable and community organizations, requests from employees, or in reaction to external events such as emergency relief situations. These are often thought of as traditional philanthropy or grant-making.

Examples of charitable donations include:
- Donations of cash, products, services or equipment to local, national and international charitable appeals
- Social “sponsorship” of causes or arts/cultural events with name recognition for the company that is not part of a marketing strategy
- Grants from corporate foundations that are not linked to a core community strategy
- Company-matching of employee donations and fundraising
- Costs of facilitating donations by customers and suppliers
- Costs of employees volunteering during working hours, if not part of a core community strategy
- Gifts of products from inventory at cost
- Occasional use of company premises and other resources

Community investments refers to long-term strategic involvement in, and partnership with, community organizations to address a limited range of social issues chosen by the company to protect its long-term corporate interests and enhance its reputation. Examples of community investments include:

Examples of community investments include:
- Membership of, and subscriptions to, charitable organizations that help to deliver the community engagement strategy
- Grants, donations (cash, product, services or equipment) to community partner organizations
- Secondments to a partner community organization and other staff involvement, such as technical or managerial assistance to a partner organization
- Time spent supporting in-house training and placements, such as work experience
- Use of company premises and other resources for partner organizations
- Costs of supporting and promoting formal employee volunteering programs

Commercial initiatives refers to business-related activities in the community, usually undertaken by commercial departments to directly support the success of the company, promoting its corporate and brand identities and other policies, in partnership with charities and community-based organizations. Only the contribution to charity or community organizations should be considered, not the total cost of the marketing campaign or similar. Examples of commercial initiatives include:

Examples of commercial initiatives include:
- The sponsorship of events, publications and activities that promote corporate brands or corporate identity
- Cause-related marketing and activities to promote sales (e.g. making donations for each item bought)
- Support for universities, and research and other charitable institutions related to the company’s business or aiming to improve the image of the brand or perception of the company
- Exceptional one-off gifts of property and other assets
5.5.3 Input

Partially public: additional credit will be granted for relevant publicly available evidence.

Assessment Focus

Question Rationale
In order to be a catalyst for development, corporate philanthropy programs need to be well managed. Creating value for beneficiaries and shareholders alike requires companies to have a clear direction and focus guiding their philanthropic activities. This question aims to assess companies’ awareness of the full costs related to their corporate citizenship programs, including indirect costs such as those linked to employee volunteering and management overheads (the costs associated with having a community affairs function in place).

Question Layout
For the last fiscal year, please estimate the total monetary value (at cost) of your company’s corporate citizenship/philanthropic contributions for each of the following categories. Please note that marketing and advertising budgets should be excluded from the calculation. Please provide supporting evidence only if this information is available in your public reporting or corporate website. Public reporting must be available individually for all of the aspects reported here to receive credit for public reporting.

<table>
<thead>
<tr>
<th>Type of Contribution</th>
<th>Total amount (in local currency)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash contributions</td>
<td></td>
</tr>
<tr>
<td>Time: employee volunteering during paid working hours</td>
<td></td>
</tr>
<tr>
<td>In-kind giving: product or service donations, projects/partnerships or similar</td>
<td></td>
</tr>
<tr>
<td>Management overheads</td>
<td></td>
</tr>
</tbody>
</table>

Question-Specific Guidance & Definitions
The categories follow the structure of the London Benchmarking Group (LBG) model. Answers should be provided as monetary values and not in, for example, hours spent or proportion of the total budget. We do not assess absolute amounts, but rather companies’ awareness of the indirect costs associated with their corporate citizenship programs.

Cash contributions refers to the monetary amount paid by a company in support of community projects. This can include direct cash contributions and payments for materials and services.

Examples of cash contributions include:
- Donations or grants
- Social sponsorship or support of cultural events or institutions
- Matched employee giving
- Employee involvement costs
- Membership and subscriptions to community-related organizations
- Cause-related marketing campaigns

Time refers to the cost to the company of the time that an employee spends on a community program during working hours.

Examples of time contributions include:
- Employee volunteering
- Fundraising
- Secondments
- Providing in-house training (e.g., supervising work experience placements)
- Development assignments

A simple way to calculate the cost of this time to a company is to divide the total number of employees by the total cost of employees. This figure can then be divided by the number of working days in a year and then by the standard number of working hours per day. With this hourly rate of employee cost to the company, a firm can accurately account for the cost of its employees’ charitable activities during working hours. Please bear in mind that only active employee involvement should be counted. The time that employees spend organizing and running an event, for instance, should go into this calculation, but the time that employees spend attending an event but not helping run it should not.

In-kind giving refers to contributions of products, equipment, services and other non-cash items from the company to the community.

Examples of in-kind contributions include:
- Donations of products (such as for prizes at community events)
- Contributions of used office equipment or furniture
- Use of company premises
- Provision of free advertising space in a publication or on a TV channel or website to a community organization
- Provision of pro bono legal, accounting or other professional services

In-kind contributions should be valued based on what it has cost the company to provide them, not on what the beneficiary would have had to pay to attain these goods or services at market prices.

Management costs (overheads) refers to the costs associated with having in place a community affairs function, for example, providing salaries and benefits to community affairs staff, and paying for their overheads and costs related to research and communications.

Examples of overhead costs include:
• Salaries, pension, national insurance, benefits and recruitment costs of communities’ affairs staff
• Running costs and overheads: phones and faxes, computer equipment, travel, business overheads, not just for individual projects
• Paying for external professional advice to better manage a program
• Communicating the community program to relevant audiences
• Research into issues and possible projects

Please assess overhead costs based on overall program coordination and communication, not by individual projects. (Time spent on one-off projects should be counted under time contributions, as described above). If managing community programs is only part of an employee’s job, the cost of that employee should be apportioned accordingly.

Disclosure requirements for partially public question

Additional credit will be granted for relevant publicly available evidence covering all of the following aspects of this question:

Total monetary value (at cost) of your company’s corporate citizenship/philanthropic contributions for each of the following categories:
- Cash contributions
- Time: employee volunteering during paid working hours
- In-kind giving: product or services donations, projects/partnerships or similar
- Management overheads

Public reporting must be available individually for all of the aspects reported here to receive credit for public reporting. Reporting of a total or overall figure is not sufficient to receive credit for public reporting.
6. GRI Mapping – Index

The table below maps the GRI reporting criteria with the questions in our Corporate Sustainability Assessment. The table highlights the relevant GRI indicators that we have identified as being identical or conceptually similar to the questions in the CSA. The table contains all the questions in the CSA which that have a link with the GRI criteria, although some of these questions are industry-specific or are cross-industry questions that do not apply to all companies and that we have not described in this document.

We have produced this table in order to provide participants with an extensive overview to help minimize the effort of filling in the CSA, but cannot guarantee the completeness of the mapping.

Please note that reporting according to GRI guidelines is not a prerequisite for completing the CSA, but rather serves as a basis for structured reporting on widely accepted sustainability topics, many of which are also addressed in the CSA.

### 6.1 GRI Mapping - Economic Dimension

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