



# NORM-BASED ENGAGEMENT



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## Q1 2023 Progress Report

April 2023 (Corrected August 2023)



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## INTRODUCTION

The Norm-Based Engagement Quarterly Report for Q1 2023 consists of five parts. The first part provides a description of ISS ESG's Norm-Based Engagement Solution, which is conducted on behalf of investors with companies that have been assessed under ISS ESG's Norm-Based Research to be facing alleged or verified severe, systematic, or systemic failures to respect international norms and guidelines on responsible business conduct.

The latter sections of the report provide details of progress of engagement activities that were carried out on behalf of institutional investors in Q1 2023:

- The second part of the report presents summary statistics of engagements initiated in Q1 2023.
- The third part highlights notable engagements carried out in Q1 2023.
- The fourth part provides summaries of engagement responses received in Q1 2023.
- The fifth part provides an overview of responsiveness to letters sent out in Q1 2023, as of 31 March 2023.

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

## ISS ESG NORM-BASED ENGAGEMENT APPROACH

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

### ENGAGEMENT SCOPE

Through ISS ESG's Norm-Based Engagement, participating investors can focus on companies that are assessed under ISS ESG Norm-Based Research to be involved in alleged or verified severe, systematic, or systemic failures to respect international norms. The engagements are categorised under the four United Nations Global Compact areas of human rights, labour rights, environment, and anti-corruption. Each engagement is identified by one or several specific topics within these areas, e.g., union rights, workplace discrimination, health and safety, child labour and forced labour within the labour rights norm area. Participating investors have the option to opt in or out of each individual company engagement.

### ENGAGEMENT PROCESS

The engagement is preceded by in-depth research and fact-finding dialogues with companies and stakeholders through ISS ESG Norm-Based Research. Once a company is identified to be involved in a relevant controversy it is considered for Norm-Based Engagement, which is conducted on a rolling quarterly basis. Through these feasibility studies, ISS ESG identifies gaps in company disclosure and assesses whether investor dialogue is an appropriate means to reach the goals set by the participating investors. Influential factors include an estimation of the company's level of responsibility, mitigating steps it has taken to mitigate the possible failure to respect a norm, and availability of both stakeholder and expert sources to facilitate constructive dialogue.

The engagement dialogue is initiated through letters to companies, sent by ISS ESG on behalf of participating investors. Dialogue may be conducted in writing or through calls and meetings, facilitated by ISS ESG. Some companies require repeated follow-ups to respond. Should the company remain unresponsive, enquiries are escalated to the CEO and the Board. Once every effort has been made to engage both Investor Relations and a company's Executive Management, the feasibility of engagement is re-evaluated.

### ENGAGEMENT OUTCOMES

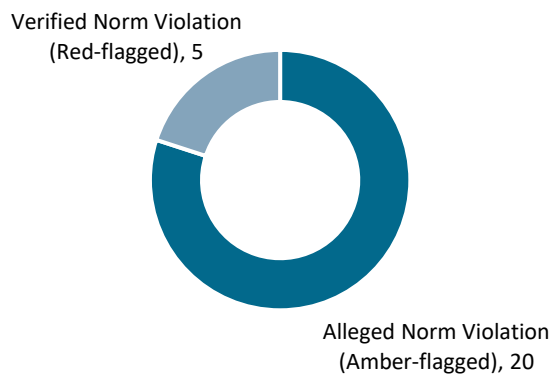
At the outset of each engagement, clear and actionable goals are defined within four key categories: disclosure, implementation, remediation and termination. Information provided by the company through the course of the engagement dialogue is assessed against the goals. ISS ESG also assesses the company's quality of participation in the engagement. Where the goals have been fulfilled and the controversy – or the risk thereof – is assessed to have been resolved, the engagement is closed. If there is insufficient information to determine whether the goals have been fulfilled, the engagement may be suspended pending developments in the controversy or the disclosure of further information by the company and may subsequently be extended. Alternatively, where there is a poor outlook for the achievement of goals for the engagement, the dialogue may be discontinued.

## STATISTICS FOR ENGAGEMENT INITIATED IN Q1 2023

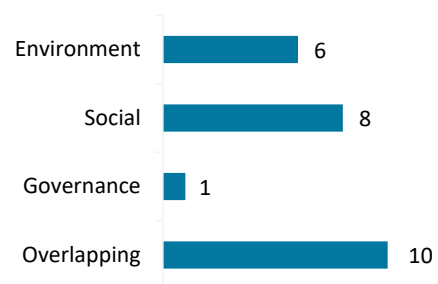
In Q1 2023, ISS ESG initiated Norm-Based Engagement on behalf of signatory investors with 25 companies, covering 40 individual ESG topics. Of these 25 companies, five were Red flagged and the remainder Amber flagged, according to ISS ESG’s Norm-Based Research methodology. By 31 March 2023, ISS ESG had received responses from 13 of the 25 companies to which investor enquiries had been sent on 15 February 2023. This constitutes an overall response rate of 52%. The statistics presented below are based on the companies with which engagement was initiated in Q1 2023.

**Summary charts of engagements initiated between 1 January 2023 and 31 March 2023:**

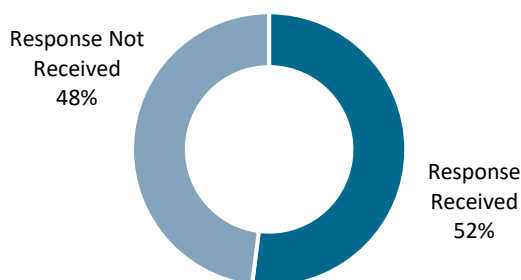
### Verified or Alleged Failure to Respect Established Norms



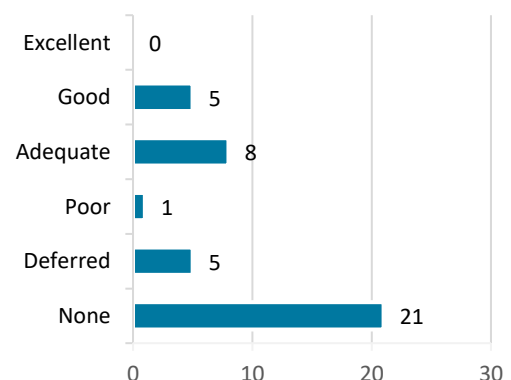
### ESG Area Breakdown



### Response Rate



### Quality of Participation



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

## NOTABLE ENGAGEMENT ACTIVITY IN Q1 2023

The cases below are examples of notable Norm-Based Engagement activity carried out on behalf of investors in Q1 2023.

<p>Rio Tinto Limited/Plc</p>	<p>ISIN GB0007188757 AU000000RIO1</p>
<p>THEME Workplace discrimination</p>	<p>LOCATION Australia</p>
<p>ACTIVITY SUMMARY</p>	<p>In Q1 2023, ISS ESG shared a letter with <b>Rio Tinto Limited/Plc</b> on behalf of participating investors regarding the company's verified failure (undergoing remediation) to prevent workplace discrimination in Australia.</p> <p>In an engagement meeting facilitated by ISS ESG in March 2023, Rio Tinto highlighted that culture is its key focus when addressing workplace discrimination issues, that its leadership is determined to create a wonderful culture at Rio Tinto and that transparency and openness are key in this endeavour.</p> <p>Furthermore, Rio Tinto provided a progress update on the implementation of the 26 recommendations from the company's 'Everyday Respect Report', stating that it is on track to complete all 26 recommendations by the end of 2024. The company also pointed out the enormous overlap between the recommendations from its own report with the recommendations of the parliamentary 'ENOUGH IS ENOUGH' report and stated its intention to fulfil all of the recommendations of the 'ENOUGH IS ENOUGH' report that are directed at mining companies.</p> <p>Rio Tinto further stated that cultural reform is the company's long-term endeavour, but that it is challenging to find key performance indicators for culture that can be used across different geographies. Hence the company used a blend of indicators such as employee engagement surveys, findings from voluntary exit surveys, percentage of female employees to track its progress. Rio Tinto also presented culture elements in its employee performance management scorecard that is across the organisation.</p> <p>ISS ESG notes the information Rio Tinto provided in this engagement dialogue, based on which the company was assessed to have made positive progress on all engagement goals, particularly with regard to the disclosure of relevant information, the implementation of relevant policies and remedial action. ISS ESG continues to monitor the efficacy of the company's commitments and remediation efforts to address the allegations.</p>

<b>Verizon Communications Inc.</b>		ISIN US92343V1044
THEME Union rights	LOCATION United States	
ACTIVITY SUMMARY	<p>In Q4 2022, ISS ESG shared a letter with <b>Verizon Communications Inc. (Verizon)</b> on behalf of participating investors regarding the company's alleged failure to respect union rights in the United States.</p> <p>In a written response in November 2022, Verizon stated that it had started collective bargaining with the Communications Workers of America (CWA) and the International Brotherhood of Electrical Workers (IBEW) and has successfully reached an agreement that extends until August 2026, for union-represented employees in the Mid-Atlantic and Northeast regions. Verizon and CWA further agreed to the terms of the first contract with unionized employees in Everett/Lynnwood, Washington, in July 2022.</p> <p>In an engagement meeting facilitated by ISS ESG in February 2023, Verizon provided more details on the topics such as its employee engagement, its grievance mechanisms and its collective bargaining processes. The company highlighted its compliance with all applicable laws and regulations, including employees' rights to engage in union activities, and that its employees can decide whether to seek union representation without coercion or fear of retaliation. Verizon further provided details on its training efforts concerning employee relations and employee rights in the workplace.</p> <p>The company also addressed CWA's allegation concerning the unlawful termination of an employee for union activities and stated that it is currently in the process of resolving and settling the legal case with the NLRB, without any admission of fault or wrongdoing. The terminated employee has been offered reinstatement and lost compensation as part of the settlement, however, that settlement has yet to be finalized. The company also stated it does not plan to commission an independent third-party investigation into concerns of undermining employees' union rights.</p> <p>ISS ESG notes the details Verizon provided in this engagement, based on which the company was assessed to have made positive progress on most engagement goals, particularly with regard to the implementation of relevant policies, remedial action, and termination of problematic practice. ISS ESG continues to monitor the efficacy of the company's remediation efforts to address the allegations.</p>	

## COMPANY RESPONSES RECEIVED IN Q1 2023

The following pages list responses received during Q1 2023, for engagements that commenced in Q1 2023 or earlier. ISS ESG received responses from 24 companies, related to 36 engagement topics. The tables present the progress achieved towards the engagement goals established for each company and topic. Deferred responses – in which the company acknowledged receiving the engagement letter but has yet to provide responses to the engagement questions – are not included.

Barrick Gold Corporation		ISIN
<p>SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.1: Reduce all forms of violence and related death rates everywhere SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials</p>		CA0679011084  QUARTER  Q3 2022
THEMES		LOCATION
Access to water / sanitation, Forced displacement, Human rights due diligence, Living standards, Right to life		Papua New Guinea
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Measures initiated
THEMES		LOCATION
Human rights due diligence, Right to life, Torture / inhumane treatment		Tanzania
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Credible measures adopted
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Measures initiated
THEMES		LOCATION
Right to health, Water pollution		Papua New Guinea
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Commitment expressed	Commitment expressed
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Measures initiated
THEMES		LOCATION
Environmental impacts, Pollution, Waste management, Water pollution		Argentina
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Credible measures adopted	Measures initiated
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Measures initiated



<b>Bayer AG</b>		ISIN <b>DE000BAY0017</b>
SDG ALIGNMENT SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species		QUARTER <b>Q2 2022</b>
THEMES <b>Biodiversity, Environmental impacts</b>		LOCATION <b>N/A</b>
ENGAGEMENT GOAL STATUS	DISCLOSURE <b>Measures initiated</b>	IMPLEMENTATION OF POLICIES <b>Measures initiated</b>
	TERMINATION OF PRACTICE <b>Measures initiated</b>	REMEDIAL ACTION <b>Measures initiated</b>

<b>Berkshire Hathaway Inc.</b>		ISIN <b>US0846707026</b>
SDG ALIGNMENT SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages		QUARTER <b>Q1 2023</b>
THEMES <b>Living standards, Right to life</b>		LOCATION <b>United States</b>
ENGAGEMENT GOAL STATUS	DISCLOSURE <b>No measures announced</b>	IMPLEMENTATION OF POLICIES <b>Commitment expressed</b>
	TERMINATION OF PRACTICE <b>No measures announced</b>	REMEDIAL ACTION <b>No measures announced</b>



<b>BHP Group Limited</b>		ISIN <b>AU000000BHP4</b>
SDG ALIGNMENT SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services, SDG 11: Sustainable Cities and Communities; 11.1: Access for all to adequate, safe and affordable housing, SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels, SDG 6: Clean Water and Sanitation; 6.1: Universal and equitable access to safe and affordable drinking water SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands SDG 10: Reduced Inequalities; 10.3: Equal opportunities of outcome, SDG 5: Gender Equality; 5.1: End all forms of discrimination against all women and girls, SDG 5: Gender Equality; 5.2: Eliminate all forms of violence against all women and girls, SDG 8: Decent Work and		QUARTER <b>Q1 2023</b>

Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers		
THEMES Access to water / sanitation, Environmental impacts, Indigenous rights, Living standards, Right to health, Right to life, Stakeholder consultation, Workplace health and safety		LOCATION Brazil
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated
THEMES Environmental impacts, Pollution, Soil pollution, Waste management, Water pollution		LOCATION Brazil
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

Empresas Copec SA		ISIN CLP7847L1080
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage, SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q3 2022
THEMES Indigenous rights, Stakeholder consultation, Water pollution		LOCATION Chile
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated

Exxon Mobil Corporation		ISIN US30231G1022
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands, SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning SDG 13: Climate Action; 13.3: Improve education, awareness-raising and human and institutional capacity on climate change SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage, SDG 16: Peace,	QUARTER Q4 2022

justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels		
THEMES Air pollution, Biodiversity, Environmental impacts, Pollution, Water pollution		LOCATION Canada
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated
THEMES Climate change regulation		LOCATION United States
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed
THEMES Climate change impacts		LOCATION Australia
ENGAGEMENT GOAL STATUS	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced
THEMES Access to water / sanitation, Indigenous rights		LOCATION United States
ENGAGEMENT GOAL STATUS	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced

Glencore Plc		ISIN JE00B4T3BW64
SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials   SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands, SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials  SDG 17: Partnerships for the Goals; 17.1: Strengthen domestic resource mobilization		QUARTER Q4 2022

SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services, SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world’s cultural and natural heritage, SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms		
THEMES		LOCATION
Pollution, Soil pollution, Waste management, Water pollution		Peru
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Commitment expressed
	Commitment expressed	Measures initiated
THEMES		LOCATION
Bribery		Nigeria
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Measures initiated
	N/A	Measures initiated

JBS SA		ISIN
		BRJBSSACNOR8
SDG ALIGNMENT		QUARTER
	SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages, SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	Q3 2022
THEMES		LOCATION
Industrial accident, Workplace health and safety		Brazil
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Measures initiated
	Measures initiated	Measures initiated
THEMES		LOCATION
Workplace health and safety		United States
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Measures initiated
	Measures initiated	Measures initiated

Jindal Steel & Power Ltd.		ISIN
		INE749A01030
SDG ALIGNMENT		QUARTER
		Q1 2023

SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services, SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels, SDG 3: Good Health and Wellbeing; 3.9: Reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination, SDG 6: Clean Water and Sanitation; 6.1: Universal and equitable access to safe and affordable drinking water		
THEMES		LOCATION
Access to water / sanitation, Forced displacement, Living standards, Stakeholder consultation		Mozambique
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Credible measures adopted	Commitment expressed
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Credible measures adopted	Credible measures adopted

Korea Electric Power Corp.		ISIN
		KR7015760002
	SDG ALIGNMENT	QUARTER
	SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services, SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels, SDG 2: Zero Hunger; 2.1: End hunger and ensure access by all people to safe, nutritious and sufficient food	Q1 2023
THEMES		LOCATION
Indigenous rights, Living standards, Right to life, Stakeholder consultation		Laos
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Commitment expressed
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Measures initiated

Lands' End, Inc.		ISIN
		US51509F1057
	SDG ALIGNMENT	QUARTER
	SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour	Q3 2022
THEMES		LOCATION
Forced labour, Human rights due diligence, Modern slavery, Religious affiliation discrimination (social), Social discrimination		China
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Commitment expressed
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	N/A

LG Chem Ltd.		ISIN
		KR7051910008
SDG ALIGNMENT		QUARTER

	SDG 3: Good Health and Wellbeing; 3.9: Reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination, SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages		Q4 2022
THEMES Right to health, Right to life			LOCATION India
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed	
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated	

Loomis AB			ISIN SE0014504817
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers		QUARTER Q4 2022
THEMES Union rights, Working conditions, Workplace health and safety			LOCATION Turkey
ENGAGEMENT GOAL STATUS	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed	
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed	

Mitsui O.S.K. Lines, Ltd.			ISIN JP3362700001
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 14: Life Below Water; 14.2: Sustainably manage and protect marine and coastal ecosystems, SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands		QUARTER Q1 2023
THEMES Biodiversity, Oil spill, Pollution, Water pollution			LOCATION Mauritius
ENGAGEMENT GOAL STATUS	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated	
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated	

Paramount Global			ISIN US92556H2067
	SDG ALIGNMENT		QUARTER Q4 2022

SDG 10: Reduced Inequalities; 10.3: Equal opportunities of outcome, SDG 5: Gender Equality; 5.1: End all forms of discrimination against all women and girls, SDG 5: Gender Equality; 5.2: Eliminate all forms of violence against all women and girls, SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	
THEMES	LOCATION
Age discrimination (workplace), Gender discrimination (workplace), Racial discrimination (workplace), Sexual harassment (workplace), Workplace discrimination	United States
ENGAGEMENT GOAL STATUS	DISCLOSURE
	Measures initiated
ENGAGEMENT GOAL STATUS	IMPLEMENTATION OF POLICIES
	Measures initiated
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE
	Measures initiated
ENGAGEMENT GOAL STATUS	REMEDIAL ACTION
	Measures initiated

Rio Tinto Limited		ISIN
		AU000000RIO1
SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands, SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials SDG 10: Reduced Inequalities; 10.3: Equal opportunities of outcome, SDG 5: Gender Equality; 5.1: End all forms of discrimination against all women and girls, SDG 5: Gender Equality; 5.2: Eliminate all forms of violence against all women and girls, SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER	
		Q1 2023
THEMES	LOCATION	
Biodiversity, Pollution, Waste management, Water pollution	Madagascar	
ENGAGEMENT GOAL STATUS	DISCLOSURE	
	Measures initiated	
ENGAGEMENT GOAL STATUS	IMPLEMENTATION OF POLICIES	
	Commitment expressed	
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	
	Commitment expressed	
ENGAGEMENT GOAL STATUS	REMEDIAL ACTION	
	Measures initiated	
THEMES	LOCATION	
Gender discrimination (workplace), Racial discrimination (workplace), Sexual harassment (workplace), Workplace discrimination	Australia	
ENGAGEMENT GOAL STATUS	DISCLOSURE	
	Measures initiated	
ENGAGEMENT GOAL STATUS	IMPLEMENTATION OF POLICIES	
	Measures initiated	
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	
	Commitment expressed	
ENGAGEMENT GOAL STATUS	REMEDIAL ACTION	
	Measures initiated	

Rio Tinto Plc		ISIN
		GB0007188757
SDG ALIGNMENT	QUARTER	
	Q1 2023	

<p>SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands, SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials SDG 10: Reduced Inequalities; 10.3: Equal opportunities of outcome, SDG 5: Gender Equality; 5.1: End all forms of discrimination against all women and girls, SDG 5: Gender Equality; 5.2: Eliminate all forms of violence against all women and girls, SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers</p>		
THEMES		LOCATION
Biodiversity, Pollution, Waste management, Water pollution		Madagascar
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Commitment expressed
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Measures initiated
THEMES		LOCATION
Gender discrimination (workplace), Racial discrimination (workplace), Sexual harassment (workplace), Workplace discrimination		Australia
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Measures initiated

Samsung Electronics Co., Ltd.		ISIN
		KR7005930003
	SDG ALIGNMENT	QUARTER
	SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	Q4 2022
THEMES		LOCATION
Bribery		South Korea
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Credible measures adopted	Measures initiated
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	REMEDIAL ACTION
	N/A	N/A

T-Mobile US, Inc.		ISIN
		US8725901040
	SDG ALIGNMENT	QUARTER
	SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	Q1 2023
THEMES		LOCATION
Union rights		United States
DISCLOSURE		IMPLEMENTATION OF POLICIES



ENGAGEMENT GOAL STATUS	No measures announced	Commitment expressed
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	No measures announced	No measures announced
THEMES		LOCATION
Consumer privacy, Consumer rights, Cybersecurity		United States
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Commitment expressed
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Measures initiated

Tokyo Gas Co., Ltd.		ISIN JP3573000001
	SDG ALIGNMENT	QUARTER
	SDG 13: Climate Action; 13.3: Improve education, awareness-raising and human and institutional capacity on climate change	Q1 2023
THEMES		LOCATION
Biodiversity, Climate change impacts, Environmental impacts		Australia
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	No measures announced	Commitment expressed
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	No measures announced	Commitment expressed

Toyota Motor Corp.		ISIN JP3633400001
	SDG ALIGNMENT	QUARTER
	SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	Q1 2023
THEMES		LOCATION
Air pollution, Pollution		Japan
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Measures initiated

Tyson Foods, Inc.		ISIN US9024941034
	SDG ALIGNMENT	QUARTER
	SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages, SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	Q4 2022
THEMES		LOCATION
Workplace health and safety		United States
	DISCLOSURE	IMPLEMENTATION OF POLICIES

ENGAGEMENT GOAL STATUS	Measures initiated	Measures initiated
	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Commitment expressed	Measures initiated

Verizon Communications Inc.		ISIN US92343V1044
	SDG ALIGNMENT	QUARTER
	SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	Q4 2022
THEMES Union rights		LOCATION United States
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	Measures initiated	Measures initiated
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	REMEDIAL ACTION
	Measures initiated	Credible measures adopted

Volcan Compania Minera S.A.A.		ISIN PEP648014202
	SDG ALIGNMENT	QUARTER
	SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials	Q4 2022
THEMES Pollution, Soil pollution, Waste management, Water pollution		LOCATION Peru
ENGAGEMENT GOAL STATUS	DISCLOSURE	IMPLEMENTATION OF POLICIES
	No measures announced	Commitment expressed
ENGAGEMENT GOAL STATUS	TERMINATION OF PRACTICE	REMEDIAL ACTION
	No measures announced	Commitment expressed

## ENGAGEMENTS INITIATED IN Q1

The following table provides an overview of the responsiveness to the engagements initiated in Q1 through the letters sent on 15 February 2023, as of 31 March 2023. Companies that had yet to respond to the initial engagement letters were sent reminder notifications on 17 April 2023. Continued non-response to the reminders will lead to escalation of engagement attempts to the CEO and then the Board level as described under the section, “Engagement Process,” earlier in this document.

ISSUER	ISIN	ESG AREA BREAKDOWN	RESPONSE RECEIVED
Berkshire Hathaway Inc.	US0846707026	Human rights	Yes
BHP Group Limited	AU000000BHP4	Overlapping (Environment, Human rights, Labour rights)	Yes
Chevron Corporation	US1667641005	Overlapping (Environment, Labour rights)	No
China Gas Holdings Limited	BMG2109G1033	Human rights	No
Deutsche Telekom AG	DE0005557508	Overlapping (Human rights, Labour rights)	No
Electricite de France SA	FR0010242511	Overlapping (Corruption, Environment)	No
Elsewedy Electric Co.	EGS3G0Z1C014	Environment	No
First Quantum Minerals Ltd.	CA3359341052	Environment	No
Fortescue Metals Group Ltd.	AU000000FMG4	Labour rights	Yes
Hino Motors, Ltd.	JP3792600003	Environment	No
Jindal Steel & Power Ltd.	INE749A01030	Human rights	Yes
Korea Electric Power Corp.	KR7015760002	Human rights	Yes
Marriott International, Inc.	US5719032022	Human rights	Yes
Mitsui O.S.K. Lines, Ltd.	JP3362700001	Environment	Yes
RATCH Group Public Company Limited	TH0637010Y00	Human rights	No
Rio Tinto Limited	AU000000RIO1	Overlapping (Environment, Labour rights)	Yes
Rio Tinto Plc	GB0007188757	Overlapping (Environment, Labour rights)	Yes
TC Energy Corporation	CA87807B1076	Human rights	No
Tesla, Inc.	US88160R1014	Overlapping (Human rights, Labour rights)	No

The Star Entertainment Group Limited	AU000000SGR6	Corruption	Yes
T-Mobile US, Inc.	US8725901040	Overlapping (Human rights, Labour rights)	Yes
Tokyo Gas Co., Ltd.	JP3573000001	Environment	Yes
Toyota Motor Corp.	JP3633400001	Environment	Yes
Vedanta Limited	INE205A01025	Overlapping (Environment, Human rights)	No
Zijin Mining Group Co., Ltd.	CNE100000502	Overlapping (Environment, Human rights)	No

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