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CSA Methodology Handbook 2026 – OIE Industry

Corporate Sustainability Assessment

S&P Global

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01
Introduction

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 S&P Global CSA Score, a key component of the S&P Global ESG Score.

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. We are also sharing the approach by which responses are assessed, what we call the "Assessment Focus."

It is important to note 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 Methodology Handbook 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. The CSA Methodology Handbook simply serves as additional information – the illustrative examples do not serve as guarantees for a higher S&P Global CSA Score.

How should you use this document?

For each covered question, this document provides 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 standards and framework, and whether internal or public documents will be necessary to answer the question, in full or in part.

For the purpose of the CSA (SA and CA both), the term "publicly available information" refers to documents, reports, websites, or other online content found **on the company's website.** Content has to be accessible via a weblink (URL). Weblinks on the company's website have to be linked to/from a page on the website that is publicly accessible.

"Publicly available information" also includes for example SBTi's target dashboard showing the targets the company has committed to.

The Question Layout sections contain key information about each question's structure but do not include standard responses such as "The information is not available." or "The question is not applicable to the company." which are options for all questions.

- The radio button item in the Question Layout sections of this document indicate that a single answer can be selected. A single answer may be followed by a number of multiple-choice items.
- The checkbox item in the Question Layout sections of this document indicates that multiple answers can be selected.

IMPORTANT NOTE:

The CSA applies 62 industry specific questionnaires. Up to 50% of the CSA questions in an industry questionnaire apply only to a cross section of industries or are sometimes even specific to that single industry. All questions available in CSA are covered in this document.

General Guidance

Criterion Weights

The Corporate Sustainability Assessment (CSA) 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 on our website under CSA Methodology. These weight schemes are also clearly visible on the Company Benchmarking Scorecard which are received by all companies following the release of the scores.

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 if the question is not applicable to you.

The standard answer options provided in each question are the following:

Answer Option	**Explanation**
No, the company does not	Should be used if the company does not have the requested information, policy or strategy.
The question is not applicable to the company.	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.
The information is not available.	This answer should be marked if the company is unaware of whether or not the required information is available within their company or not.

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. All questions have a paperclip evidence icon regardless of whether the question explicitly requires supporting evidence. We have long required supporting evidence for a majority of the questions in the CSA and have been increasing the number of questions for which not only private, but also public references are needed. Growing scrutiny on the analytical process behind ESG scores requires enhanced auditing of the answers provided in the CSA: all questions, or, as applicable, single data points, include the option to attach supporting evidence.

Comments

The comment box found at the bottom of each question is a tool that can be used to provide additional information or explanations for the answers that you have provided, however, the provision of these explanatory comments should be the exception and not the rule. For example, it can be used to explain underlying data collection methodologies, changes in approaches from one year to another, what parts of the company the data or answers refer to, or why a question is not applicable to the company's business model.

Financial Year Approach

The general rule for the different reporting cycles (other than calendar year end) is:

- For all the FY ending cases till March, the quantitative data for questions such as in time series question, has to be captured in FY-2 text box. For instance, cases till March 2025 should be captured in the FY2024 text box and so on and so forth. Similarly, if a company's FY end is 1st week of April, 2025 we should consider the data available in FY-2. The idea is that the

information available in the reports in this case would cover majority of the months of FY 2024.

- Therefore, the information should be captured in the FY-2 text box.
- Respectively, for all the FY ending cases in any month after 31st March, the quantitative data is to be captured in the latest year text box, and so on and so forth i.e. if data is available for 30th June 2025, it will be captured under FY 2025 column. For example: Australian companies follow the financial year reporting period 2025 from July 1, 2024, to June 30, 2024, please note that data categorized for FY 2025 will be used for CSA 2026 for quantitative questions.
- For policy documents, policies approved after the end of fiscal year can be accepted for the current assessment cycle. For example; Climate Public policy (for Lobbying and trade associations) approved in May 2025, used to assess the question in a company with the reporting year ending in 31.12.2024 in the CSA 2026 cycle.

Document Retention Policy

Any document attached to the assessment in a given year may not be older than 2 years (24 months). This is defined as the most recent (reporting) year and the most recent (reporting) year minus 1 year. For example: if a company has reporting years that align with calendar years, we would ONLY accept the Annual Report and Sustainability Report 2025 and 2024 for the CSA 2026, irrespective of the publishing date.

Media & Stakeholder Analysis

We perform a Media & Stakeholder Analysis (MSA) as part of our assessment methodology to check the consistency of a company's behaviour and management of crisis situations in line with its stated principles and policies. The MSA enables S&P Global to monitor companies' sustainability performance on an ongoing basis by assessing current controversies with potentially negative reputational or financial impacts. The main objective of the MSA process is to gain insight into a company's ability to mitigate financially material and reputational risks, as well as negative impacts on stakeholders and the environment, whilst protecting their shareholder value.

Media and stakeholder stories on corporate controversies are monitored on an ongoing basis through S&P Global's proprietary controversies screening model, which based on pre-defined filters, aggregates and pre-screens content from global, local and regional news sources, governmental and non-governmental organizations, legal materials, as well as industry publications, among others (Prior to March 16, 2026, corporate controversies part of the MSA were monitored, compiled and pre-screened by S&P Global' s former partner RepRisk.).

In the event that 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 feedback 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 Sustainability Performance" white paper available at our website as well as the "MSA Methodology Guidebook".

Assessment focus

In the spirit of transparency, we are sharing the assessment focus of the questions contained in the CSA Methodology Handbook. In each question, we will include icons to give an indication of what we are looking for.

Assessment Focus	Icons	Description
Coverage/Scope		Appraises the coverage and scope of policies, programs or KPIs
Completeness/Comprehensiveness of Policy		This aspect refers to the policy or program thoroughly addressing multiple scenarios
Multiyear data		This aspect refers to the collection of multiyear quantitative data
Performance over the years		This aspect refers to the evaluation of a key performance indicators (KPIs) over three- or four-year's data
Performance against peers		This aspect refers to the evaluation of a key performance indicators (KPIs) against its peers
Performance against benchmark		This aspect refers to the evaluation of a key performance indicators (KPIs) in relation to predefined standards or best practices within the industry
Performance against target		Assess if a specified target is achieved
Accountability		This aspect evaluates whether responsibilities are clearly defined
Assurance		Data or programs or systems verified by an independent third party
Transparency		Additional credit will be granted for relevant publicly available evidence

PLEASE NOTE: The question texts, methodology, and assessment schemes presented may be subject to change at any time at the discretion of S&P Global. 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 Methodology Handbook and if such updates should take place, there will be an update of the date shown on the title page of the CSA Methodology Handbook.

02

Company Information

Denominator – Total Employees / Revenues

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

OIE, PRO

Question Rationale

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

Question Layout

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

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

Normalization factors
Please select which of the following normalizing units the company would like to use in order to normalize data reported in the environmental dimension ("Climate Strategy", "Waste & Pollutants", "Water" and "Energy" criteria). **Please also provide information for all other requested fields.**
Dropdown menu:
Revenues
FTEs

Financial year-end date
Please specify the company's financial year-end date in the following format:
dd.mm.yyyy (e.g. 31.12.2025)

Company data	Financial Year 2022	Financial Year 2023	Financial Year 2024	Financial Year 2025
Revenues Please indicate if figures are reported or constant currency: Dropdown menu: Constant currency Reported revenues				
Revenues in US Dollars				

Please convert the revenues in US dollars at the exchange rate of the company's fiscal year-end date.

Total employees

Question-Specific Guidance & Definitions

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

Revenues in US Dollars: Please convert the revenues reported in each year using the exchange rate at the end of that corresponding fiscal year. In other words, if your company has a fiscal year that ends on the 31st of December, the revenues provided for FY2019 should be converted using the exchange rate on 31.12.2019. The revenues provided for FY2020 should be converted using the exchange rate on 31.12.2020.

Total Employees: the number of people employed on a full time and part-time basis by the company, calculated as: Total Employees = Full Time Employees + 0.5 * Part Time Employees. If you calculate your total number of employees differently, please describe your method in the comment box.

Data Requirements

- Please provide information for all parts of this question and ensure that the figures provided are consistent over four years as well as consistent with the figures (e.g., emissions) provided in the other questions.
- **Reporting currency:** currency selected will be used throughout the questionnaire for consistency purposes, and will automatically be selected for questions asking for monetary data.
- Unless otherwise specified, all monetary values should be reported in their absolute values.
- If available for your industry, please select the appropriate normalization factor to be used for normalizing data reported in the "Emissions"

Supporting evidence: No document is required to support your response. You may still provide a reference using the reference clip. This could include examples of the underlying calculations or approaches to data aggregation used to compile the provided quantitative information.

Standards & Frameworks

CDP - 1.2
CSRD - BP-1 Basis for Preparation, E1-5 Energy Intensity for Activities in High Climate Impact Sectors, E1-6 GHG Emissions Intensity, SBM-1 Revenues & ESRS Sectors
SFDR - Climate and GHG Emissions, Revenues and Enterprise Value, Water

Governance & Economic Dimension

Transparency & Reporting

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

Sustainability Reporting Boundaries

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

Setting clear sustainability reporting boundaries is necessary for stakeholders and investors to understand how the sustainability disclosure of a company reflects its organizational and managerial reality. The greater the scope of information disclosed, the greater the representation of a company's business activities as a whole: this provides a more accurate picture of the environmental and social impacts of the company. Stakeholders and established standards and frameworks are expecting companies to increasingly align their sustainability disclosures with the boundaries set for financial disclosures

Question Layout

Does the company report on the scope or boundaries of its sustainability disclosure?

- Yes, the company reports on the scope or boundaries of its sustainability disclosure. Please indicate where this information is available in **public reporting or corporate website**.
  - All activities fully consolidated for financial reporting purposes are covered
  - The following percentage of the company's revenues is covered by its sustainability disclosure:
    Dropdown menu:
    75%-100%
    50%-75%
    25%-50%
    0-25%
  - All activities under operational control and/or majority-owned are covered
  - None of the above applies, but the company provides the criteria used for sustainability data disclosure (e.g., a list of included or excluded entities, geographies or divisions)
- No, the company does not report on the scope or boundaries of its sustainability disclosure, but has disclosed the coverage of some specific environmental or social indicators. Please indicate where this information is available in **public reporting or corporate website.**
  - ☐ Some environmental indicators have coverage details
  - ☐ Some social indicators have coverage details

Question-Specific Guidance & Definitions

Financially consolidated activities: This refers to all subordinate entities, subsidiaries, etc., that the company has consolidated in its financial statement. Financial accounting standards require reporting companies to consolidate all entities that they control.

Operational control: An organization has operational control if it has the authority to introduce and implement its processes and operating policies on an operation.

Majority-owned activities: These are subordinate entities or subsidiaries in which the reporting company (e.g., parent company) owns more than 50% of outstanding shares

Data Requirements

- For marking of revenues covered by sustainability disclosure there should be explicit mention of the revenue quantification. Please do not provide proxy values.
- If your company has disclosed the reporting boundaries or scope of reporting used for your sustainability disclosure, and more than one option can be selected among those in the single-choice section, please consider that a high (75%-100%) revenue coverage of a company's sustainability disclosure or an alignment between the financial consolidation and sustainability disclosure are considered best practices and should be used as options.
- If the majority of your revenue is derived from minority (non-consolidated) interests, please use the revenue field to indicate the coverage of your sustainability disclosure. Please also provide a brief description of your minority interests in the comment box of the question, explaining how they have been included in your sustainability disclosure and within the CSA.
- If you have used the revenue field, but the revenue coverage is not explicitly stated in the reporting boundaries section of your sustainability disclosure, please provide the necessary public documents to corroborate the coverage range provided and indicate the necessary calculations in the comment box. For groups and holding companies, this percentage coverage must be calculated against the total revenue reported in the consolidated financial statement.

Disclosure Requirements

- This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications, corporate citizenship/corporate social responsibility report, financial report) or corporate website.
- Please ensure the information needed to mark any of the options is clearly disclosed in the attached documents

Standards & Frameworks

CDP 2025 - 1.5
UNGC - G1

Sustainability Reporting Assurance

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

As with financial data, assurance of environmental and social data ensures that it is more reliable and increases the likelihood that investors will use this data in their analysis and investment decisions. Transparency about the assurance process and the data assured also increases stakeholders' trust in published information.

The purpose of this question is to assess the extent to which companies disclose details related to their environmental and social assurance

Question Rationale

Question Layout

Does the company have external assurance for its sustainability reporting?

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

Question-Specific Guidance & Definitions

Assurance specialists: This group includes accountants, certification bodies, and specialist consultancies. It does not include an independent advisory boards, stakeholder panels or high-level individuals (e.g., environmental ministers).

Declaration of independence: An explicit statement of independence from the auditor confirming there is no other commercial link to the company's operations or business that could result in a conflict of interest.

Recognized international or national standard: This refers to assurance standards and not reporting standards (such as GRI guidelines). Examples of these assurance standards are AA1000AS and ISAE 3000, but regional or local standards are also acceptable if they are clearly specified and are comparable to international standards.

Examples include:

- Standard DR03422 (Australia/New Zealand)
- Assurance Engagements of Sustainability Reports (Germany)
- Environmental Report Assurance Services Guidelines by the JICPA (Japan)
- FAR auditing standard RevR6 (Sweden)
- Standard 3810 Assurance Engagements related to Sustainability Reports (the Netherlands)
- AT-C Section 105 and 210 (US/Canada)

Scope of assurance: If the scope of assurance covers some (but not all) environmental indicators, these need to be clearly marked in the relevant sections of the report. If the assurance statement covers all data items in the report, this also needs to be explicitly stated.

Conclusion/level of assurance: This refers to the conclusion of the assurance process which is according to the level of assurance, i.e., "*limited/moderate" or "reasonable assurance"*. The level of assurance indicates the extent and depth of the work the assurance provider undertakes in relation to sustainability disclosures. Most assurance

providers offer two levels: “limited” assurance (i.e., moderate) or reasonable assurance (i.e., high but still involving some risk of inappropriate conclusion) (GRI 2013).

Data Requirements

AA1000AS (2008): Type 1 – Type 1 cannot be used to accept the social and environment scope parts of this question, nor the third-party verification of KPI questions across the CSA as it does not verify the accuracy of a specific sustainability data. However, Type 1 can still be used to accept the 'assurance statement' part of this question and, if relevant information was provided, the “declaration of independence” and “conclusion” parts as well.

Not acceptable:

- The assurance of GHG emissions is not accepted for this question as we are looking for an assurance statement or verification of a company’s sustainability disclosure.
- Assurance statement based on GRI guidelines are not accepted as these are meant to be used as reporting guidelines, not an assurance standard.
- FAR auditing standard RevR 12 The auditor’s statement on the statutory sustainability report is not accepted as this only verifies the existence of a report and not its content.
- BBBEE certification

Disclosure Requirements

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

Any response that cannot be verified in the attached public document(s) will not be accepted.

Standards & Frameworks

TNFD - Governance A.
UNGC - G13

Corporate Governance

Corporate governance systems ensure that a company is managed in the interests of shareholders, including minority shareholders. Checks, balances and appropriate governance practices enable the Board of Directors to have appropriate control, oversight responsibilities and accountability mechanisms. These range from ownership type, ensuring a high ratio of independent directors, having diversity policies which translate into diverse boards, hiring directors with industry experience, limiting other mandates, maintaining an adequate tenure, and ensuring a high attendance to board meetings as well as the establishment of governance structures for the management of ESG risks and opportunities. Management incentives have also been proved to align management and shareholders' interests' long-term interests.

Board Independence

Flexible: Public information requirements depend on if the company is listed or non-listed.

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

An independent director is a member of the company's board of directors who is brought in from outside the organization. Independent directors can bring new insights and balance that improve the company's performance through their objective view of its health and operations. At times, they can also bring specific expertise from their experience and provide additional accountability. We assess the extent to which companies have made explicit statements about their definitions of and requirements concerning board members' independence.

Question Layout

Does the company have an independence statement for the board of directors?

- Yes, the company has an independence statement. Please indicate below what the statement includes and provide a reference:
  Listed companies are required to provide links to public reports or corporate websites.
  Non-listed companies are required to provide internal documents and/or links to public reports or corporate websites.
  - The company complies with the following corporate governance code or stock exchange rules
  - The stock exchange the company follows is not on the list or the company has its own own stricter independence requirements. The requirements cover the following:
    - ☐ The director must not have been employed by the company in an executive capacity within the last year.
    - ☐ The director must not accept or have a "Family Member who accepts any payments from the company or any parent or subsidiary of the company in excess of $60,000 during the current fiscal year," other than those permitted by SEC Rule 4200 Definitions, including (i) payments arising solely from investments in the company's securities; or (ii) payments under nondiscretionary charitable contribution matching programs. Payments that do not meet these two criteria are disallowed.
    - ☐ The director must not be a "Family Member of an individual who is employed by the company or by any parent or subsidiary of the company as an executive officer."
    - ☐ The director must not be (and must not be affiliated with a company that is) an adviser or consultant to the company or a member of the company's senior management.
    - ☐ The director must not be affiliated with a significant customer or supplier of the company.
    - ☐ The director must have no personal services contract(s) with the company and cannot be a member of the company's senior

management.

- ☐ The director must not be affiliated with a not-for-profit entity that receives significant contributions from the company.
- ☐ The director must not have been a partner or employee of the company's outside auditor during the past year.
- ☐ The director must not have any other conflict of interest that the board itself determines to mean they cannot be considered independent.

Target share

☐ The company has a target share of independent directors on the board. Please specify:

Question-Specific Guidance & Definitions

Independent directors: These are non-executive directors that are independent by meeting at least four of the nine criteria (including two of the three first criteria) listed below:

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

Data Requirements

- Please provide your publicly available independence statement, public reporting on the definition of independence used (i.e., if it is in line with local or international standards corresponding to the definition used by us) and public reporting on the target share of independent directors on the board.
- Please select the stock exchange with which you comply with. We allow you to select an established national or stock exchange Corporate Governance Code as long as this also meets our definition of independence.
- If you are a member of a stock exchange that is not listed or you have stricter requirements, please select what parts of the Board Independence statement your company satisfies. We expect the statement to meet at least four out of nine criteria of which at least two of the first three. If this is not the case, please indicate so.

Specific data requirements for non-listed companies:

Family-owned companies

- All family members who are on the board of directors and employed by the company are to be considered as executive directors.
- Family members that are only on the board and that do not have any executive role can be considered as independent directors if they meet at least four out of nine criteria of which at least two of the first three criteria for independence.

State-owned companies

- Government representatives can be considered as "independent" if they meet at least 4 out of 9 criteria of which at least 2 of the first 3 criteria for independence.

Disclosure Requirements

Listed and/or publicly owned companies are required to provide links to public reports or corporate websites.

Non-listed companies are required to provide the following evidence, depending on the type of company:

- **Family-owned companies and privately owned companies** are required to provide public reports, corporate websites, or internal documents.
- **Cooperatives** are required to provide public reports, corporate websites, or internal documents.
- **State-owned companies** are required to report on their corporate governance in the public domain as their key stakeholder is the general public.

Please note: Answers in the form of 'Confidential additional comments' for any type of non-listed company will not be accepted.

Board Type

Flexible: Public information requirements depend on if the company is listed or non-listed.

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

An effective board of directors, properly constituted, is the linchpin of good corporate governance. Boards are responsible for managerial performance, meeting the corporation's stated objectives, complying with applicable laws and regulations, and protecting shareholder rights and interests. To assess the quality of a board's structure, we focus on its composition, its proportion of independent members, and its overall size, as empirical studies show that oversized boards are counter-productive to performance.

Question Layout

Does the company report on its board type?

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

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

- Yes, the company reports on its board type.
  - **ONE-TIER SYSTEM (companies with a board of directors)**

Type of director	Number of members
Executive directors	
Independent directors	
Other non-executive directors	
Total board size	

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

Type of board	Type of director	Number of members
Supervisory board	**Independent directors**	
	Other non-executive directors	
	Employee representatives (if none, please insert zero)	
Management board/executive management	**Senior executives**	
	Total size of both boards	

Question-Specific Guidance & Definitions

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

One-tier systems: These 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: These have an executive board and a supervisory board, which is composed of non-executive or independent members and – in certain countries – employee representatives. Countries that commonly use two-tier systems include Austria, Denmark, Finland, France, Germany, Hungary, and The Netherlands. Sweden and

Norway are exceptions and should be classified as one-tier despite the presence of employee representatives on the board.

For French companies that have a one-tier board system with employee representatives, in accordance with the French code of corporate governance, employee representatives should be considered non-executive directors and be included in the total board size.

Types of directors: We outline definitions of possible types of directors below. These definitions should be used to classify board members. Please note that we only consider board members that are **currently** (at the time the assessment is performed) on the board, e.g., if a board member resigned in March 2020 and the assessment was performed in May 2020, that board member would not be considered.

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

Independent directors: These are non-executive directors that are independent by meeting the requirements set out in the Board Independence question.

Other non-executive directors: are directors that are not executives and do not qualify as independent as defined above. They are members of the board not already accounted for in the executive and independent categories. They might be employed by the organization at a non-executive level.

Data Requirements

Provide information on board members that are currently (at the time the assessment is performed) in the board. This means that if the board member has resigned from the board (for example in March 2020) and the assessment in performed in May 2020, do not include them as part of the board.

Include board member who has announced her/his resignation but has not yet resigned (at the time the assessment is performed) as part of the board. She/he should not be included if she/he has already resigned at the time the assessment is performed.

A board nominee should not be included as a board member unless she/he has already been elected at the time of the assessment. (A nominee should only be included if she/he sits for re-election, not if she/he's a nominee for a first mandate).

This question is automatically filled out with information from S&P Capital IQ. If any correction is required, please follow these requirements:

- Ensure that the type of board, the breakdown between the different types of directors, and the total board size are filled out.
- If the definition of independence at the company differs from our definition given in the Board Independence question, please adjust the number of independent directors in line with our definition and provide a comment in the comment box.

Specific data requirements for non-listed companies:
Do not provide information on Board of Trustees for this question. This functions differently from a Board of Directors and are usually only present for non-profit entities.

Family-owned companies

- All family members who are on the board of directors and employed by the company are to be considered as executive directors.
- Family members who are only on the board and who do not have any executive role can be considered as independent directors if they meet at least four out of the nine criteria of which at least two of the first three criteria for independence.

State-owned companies

- Government representatives can be considered as "independent" if they meet at least 4 out of 9 criteria of which at least 2 of the first 3 criteria for independence.

Disclosure Requirements

Listed and/or publicly owned companies are required to provide links to public reports or corporate websites.

Non-listed companies are required to provide the following evidence, depending on the type of company:

- **Family-owned companies and privately owned companies** are required to provide public reports, corporate websites, or internal documents.
- **Cooperatives** are required to provide public reports, corporate websites, or internal documents.
- **State-owned companies** are required to report on their corporate governance in the public domain as their key stakeholder is the general public.

Please note: Answers in the form of 'Confidential additional comments' for any type of non-listed company will not be accepted.

Standards & Frameworks

CDP 2025 - 4.1
UNGC - G9

Non-Executive Chairperson/ Lead Director

Flexible: Public information requirements depend on if the company is listed or non-listed.

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

International consensus favors the separation of the roles of chairperson and CEO. If the board of directors opts to appoint one person to fulfill both roles, it must build in the necessary checks and balances to avoid potential abuses of power. Companies headed by a joint chairperson/CEO are expected to explain their reasoning for this structure, to have appointed a "lead independent director" and to provide a statement about the lead director's responsibilities.

Question Layout

Is the board of directors/supervisory board headed by a non-executive and independent chairperson and/or an independent lead director?
Listed companies are required to provide links to public reports or corporate websites.
Non-listed companies are required to provide internal documents and/or links to public reports or corporate websites.

- The chairperson is non-executive and independent.
- The chairperson is non-executive but not independent.
- The chairperson is not independent, but an independent lead director has been appointed.
- The chairperson is an executive director, but an independent lead director has been appointed.
- The chairperson is an executive director.

Question-Specific Guidance & Definitions

Independent lead director: This role exists to provide leadership to the board in cases where the joint roles of chairperson and CEO may 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: These are non-executive directors considered independent by meeting at least four of the nine criteria (including at least two of the three first criteria) listed below:

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

Executive Director: A board member who also holds an executive role within the organization (e.g. CEO, CFO). It is not possible for an executive director to be both independent and simultaneously. Therefore, only the options for executive chairpersons can be

selected in such scenarios, regardless of other roles and statuses the member might have.

Data Requirements

Provide information on board members that are currently (at the time the assessment is performed) in the board. This means that if the board member has resigned from the board (for example in March 2020) and the assessment in performed in May 2020, do not include them as part of the board.

Include board member who has announced her/his resignation but has not yet resigned (at the time the assessment is performed) as part of the board. She/he should not be included if she/he has already resigned at the time the assessment is performed.

A board nominee should not be included as a board member unless she/he has already been elected at the time of the assessment. (A nominee should only be included if she/he sits for re-election, not if she/he's a nominee for a first mandate).

Disclosure Requirements

Listed and/or publicly owned companies are required to provide links to public reports or corporate websites.

Non-listed companies are required to provide the following evidence, depending on the type of company:

- **Family-owned companies and Privately owned companies** are required to provide public reports, corporate websites, or internal documents.
- **Cooperatives** are required to provide public reports, corporate websites, or internal documents.
- **State-owned companies** are required to report on their corporate governance in the public domain as their key stakeholder is the general public.

Please note: Answers in the form of 'Confidential additional comments' for any type of non-listed company will not be accepted.

Board Diversity Policy

Flexible: Public information requirements depend on if the company is listed or non-listed.

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

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

Diversity adds value to the board through differences in perspectives and experience. Diverse boards can assess problems from a broader point of view and are more likely to take into account the interests of all stakeholders. Furthermore, studies have shown a positive correlation between gender diversity on boards and companies' financial performance. It is also important for board members to have a broad and complementary range of skills, although boards' needs can differ across individual companies and industries depending on the existing and required skills of board members and the pool of qualified board members available when electing new board members.

Question Layout

Does the company have a policy on board diversity?

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

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

- ○ Yes, the company has a policy on board diversity.
  - ☐ Gender
  - ☐ Race or ethnicity
  - ☐ Nationality, country of origin or cultural background

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 states that it adheres to the local corporate governance code without exceptions or clearly states what those exceptions are and that they do not include the diversity factors specifically ticked in the question
- The local corporate governance code clearly indicates that the specific criteria ticked in the response are considered for the board nomination process.

Race: In the absence of any internationally agreed definition, race is most often statistically characterized in terms of phenotype and appearance (e.g., skin colors), or with regard to ancestry. This should not be understood as an attempt to trace the definition of race to biological, anthropological or genetic factors but rather to (somewhat artificially) distinguish it from the concept of ethnicity (OECD, 2018).

Ethnicity: This describes a shared culture, the practices, values, and beliefs that characterize those belonging to a community. This multidimensional concept acts as an umbrella term encompassing language, religious traditions, and others (UN, 2017). A number of related concepts, including ancestry, citizenship, and nationality, may

overlap with ethnicity. However, ethnicity is not the same as nationality or citizenship, nor it is a measure of biology or genes (OECD, 2018).

Nationality: While geographic diversity has received less attention than gender or racial diversity on boards, geographic diversity adjusts the lens through which risks and strategies are examined. To manage global risks and opportunities and to improve board effectiveness, geographic diversity in the boardroom in a global marketplace needs to increase. Here, nationality captures a person's country of origin or citizenship

Data Requirements

General references to diversity, such as not discriminating between board candidates, is not sufficient.

A board diversity policy needs to contain specific requirements for taking diversity factors into account during board nomination. Statements related to non-discrimination between sexes, nationalities, etc. or statements confirming that a company complies with local laws around non-discrimination are not sufficient.

For two-tier board structures, the policy needs to apply to the supervisory board and the management board.

Please mark **"The question is not applicable to the company"** for family-owned companies: We do not expect family-owned businesses to have a policy to foster board diversity (in terms of ethnicity, nationality, origin and gender) if the company only allows family members on the board, given that they cannot influence aspects like gender or nationality.

Regulations that limit companies' ability to select board members are not sufficient to mark this question "Not applicable".

Disclosure Requirements

Listed and/or publicly owned companies are required to provide links to public reports or corporate websites.

Non-listed companies are required to provide the following evidence, depending on the type of company:

- **Family-owned companies and privately owned companies** are required to provide public reports, corporate websites, or internal documents.
- **Cooperatives** are required to provide public reports, corporate websites, or internal documents.
- **State-owned companies** are required to report on their corporate governance in the public domain as their key stakeholder is the general public.

Please note: Answers in the form of 'Confidential additional comments' for any type of non-listed company will not be accepted.

Standards & Frameworks

CDP 2025 - 4.1

Board Gender Diversity

Flexible: Public information requirements depend on if the company is listed or non-listed.

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

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

Question Layout

Does the company report the number of women on its board of directors/supervisory board?
Listed companies are required to provide links to public reports or corporate websites.
Non-listed companies are required to provide internal documents and/or links to public reports or corporate websites.

○ Yes, the company reports the number of women on its board of directors/supervisory board.

Metric	Value
Number of female directors	

Data Requirements

Provide information on board members that are currently (at the time the assessment is performed) in the board. This means that if the board member has resigned from the board (for example in March 2020) and the assessment in performed in May 2020, do not include them as part of the board.

Include board member who has announced her/his resignation but has not yet resigned (at the time the assessment is performed) as part of the board. She/he should not be included if she/he has already resigned at the time the assessment is performed.

A board nominee should not be included as a board member unless she/he has already been elected at the time of the assessment. (A nominee should only be included if she/he sits for re-election, not if she/he's a nominee for a first mandate).

For one-tier boards: Employee representatives should not be included in the total number of women on the board for one-tier boards. If there are no women on the board of directors or supervisory board, please write 0 when answering this question.

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

For this question, we are looking for the number of women on your company's board of directors/supervisory board.

- If your company has a one-tier board structure, this figure includes female executive directors, non-executive directors, and independent directors.
- If your company has a two-tier board structure, this figure ONLY includes female independent directors and non-executive directors (meaning senior executives and employee

representatives should not be included). Hence, the management board should not be considered in this question.

Disclosure Requirements

Listed and/or publicly owned companies are required to provide links to public reports or corporate websites.
Non-listed companies are required to provide the following evidence, depending on the type of company:

- **Family-owned companies and privately owned companies** are required to provide public reports, corporate websites, or internal documents.
- **Cooperatives** are required to provide public reports, corporate websites, or internal documents.
- **State-owned companies** are required to report on their corporate governance in the public domain as their key stakeholder is the general public.

Please note: Answers in the form of 'Confidential additional comments' for any type of non-listed company will not be accepted.

References

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

Standards & Frameworks

SFDR - M - Board Gender Diversity
UNGC - G9

Board Accountability

Flexible: Public information requirements depend on if the company is listed or non-listed.

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

An accountable board of directors is vital for good corporate governance. 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. The parameters in this question act as a proxy for the overall effectiveness of the board. This includes meeting attendance, number of external directorships board members hold and performance assessment, which aims to measure the effectiveness of the individual member. To measure accountability, we ask if there are limitations to directors' liability. Shareholders' interests can be protected through mechanisms such as annual elections, not having a classified board and requiring shareholder approval for changes in the bylaws. Finally, we ask if the company has a CEO succession plan. It is the responsibility of the board to appoint a CEO and a succession plan may mitigate any disruption in the operations after the departure of a CEO, which reflects back on the board.

Question Layout

Does the company have practices to ensure the accountability of its board of directors/supervisory board and the alignment with the long-term interests of shareholders?

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

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

- ○ Yes, the company has practices to ensure the accountability of its board of directors through the following measures.
  - ☐ Average board meeting attendance is above 75%
  - ☐ Shareholder approval required for changes in bylaw
  - ☐ The company has board members with 4 or less other mandates
  - ☐ CEO succession plan is in place
  - ☐ Board performance reviews are in place
  - ☐ There is no limitation to directors' liabilities
  - ☐ Board members are elected on an annual basis

Question-Specific Guidance & Definitions

This question only applies to board members who represent shareholders (or multiple stakeholders including shareholders). For two-tier board structures, this question should only include the supervisory board and not the management board.

Meeting attendance: Refers to the average aggregate percentage of board meetings attended by all members over the last fiscal year, exceeding 75%.

Other mandates: Refers to the number of other external directorships in publicly listed companies held by members of the board of directors/supervisory board (examples include executive board positions such as CEO, or member of the board of directors at another company). Board memberships in private limited companies, educational institutes (schools, colleges, or universities), and non-profit organizations are not considered in our definition of other mandates. Only the number of mandates for independent and non-

executive directors should be considered, not mandates for executive directors or employee representatives.

Board performance review: Both self-assessment and independent assessment can be considered for this part., Independent means that an independent third party evaluates the board's performance.

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

CEO succession plan: A plan for who can replace the CEO and by what time the person would be ready to assume the position. This includes a planned and unplanned departure of the CEO. The purpose of this is to ensure a continuation of a company's operation and strategy.

Director liability: Indicates that provisions exist that limit directors' personal liability to the extent allowed by state law (Source: CIQ)

Disclosure Requirements

Listed and/or publicly owned companies are required to provide links to public reports or corporate websites.

Non-listed companies are required to provide the following evidence, depending on the type of company:

- **Family-owned companies and Privately owned companies** are required to provide public reports, corporate websites, or internal documents.
- **State-owned companies** are required to report on their corporate governance in the public domain as their key stakeholder is the general public.

Please note: Answers in the form of "Confidential additional comments" for any type of non-listed company will not be accepted.

References

McKinsey Strategy & Corporate Finance "Toward a Value-Creating Board" by Conor Kehoe, Frithjof Lund, and Nina Spielmann

Standards & Frameworks

CDP 2025 - 4.1

Board Average Tenure

Flexible: Public information requirements depend on if the company is listed or non-listed.

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

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 the one hand, and refreshment of skills and perspectives as well as 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

Does the company report the average tenure of board members on its board of directors/supervisory board in years?
Listed companies are required to provide links to public reports or corporate websites.
Non-listed companies are required to provide internal documents and/or links to public reports or corporate websites.

- ○ Yes, the company reports the average tenure of board members on its board of directors/supervisory board in years. Please indicate where this information is available.

Average tenure	Unit	Value
Average tenure	years	

Data Requirements

Provide information on board members that are currently (at the time the assessment is performed) on the board. This means that if the board member has resigned from the board (for example in March 2020) and the assessment is performed in May 2020, do not include them as part of the board.

Include board members who have announced her/his resignation but have not yet resigned (at the time the assessment is performed) as part of the board. She/he should not be included if she/he has already resigned at the time the assessment is performed.

A board nominee should not be included as a board member unless she/he has already been elected at the time of the assessment. (A nominee should only be included if she/he sits for re-election, not if she/he's a nominee for a first mandate).

In this question, we expect disclosure on average board tenure and/or individual tenure of each member of the board of directors.

Tenure: The number of years a member has served on the board of directors. Please consider the calendar year as the base year. For example, if a director was appointed in March 2017, their tenure would be counted as 2025-2017 = 8 years.

Mergers and acquisitions: If the company is a spinoff or merger, tenure from the previous company is counted.

If a company is less than 10 years old, the company should mark "The question is not applicable to the company".

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

For **two-tier boards:** Employee representatives and senior executives should not be included in the calculation for two-tier boards, as they are not considered in the calculation of the total size of the supervisory board. The management board members should not be included when calculating the average tenure.

Disclosure Requirements

Listed and/or publicly owned companies are required to provide links to public reports or corporate websites.

Non-listed companies are required to provide the following evidence, depending on the type of company:

- **Family-owned companies and privately owned companies** are required to provide public reports, corporate websites, or internal documents.
- **Cooperatives** are required to provide public reports, corporate websites, or internal documents.
- **State-owned companies** are required to report on their corporate governance in the public domain as their key stakeholder is the general public.

Please note: Answers in the form of 'Confidential additional comments' for any type of non-listed company will not be accepted.

References

Julie Daum, et al. 2023 S&P 500 New Director and Diversity Snapshot. August 2023

OECD Corporate Governance Factbook 2025

Board Industry Experience

Flexible: Public information requirements depend on if the company is listed or non-listed.

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

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 vital 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 strategies and effectively monitoring and evaluating management's performance.

Question Layout

Does the company report on the number and names of the board members with relevant work experience in its sector according to GICS Level 1 sector classification (excluding executive members and employee representatives)?
Listed companies are required to provide links to public reports or corporate websites.
Non-listed companies are required to provide internal documents and/or links to public reports or corporate websites.

- ○ Yes, the company reports on the number and names of the board members with relevant work experience in its sector according to GICS Level 1 sector classification.

Metric	Value/Names
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 Level 1 classification below). This experience can be acquired by way of functions in management, academia, consulting, or research. "Practical work experience" in the industry refers to experience attained in employee or executive roles. Having been on another company's board in the same industry does not qualify as relevant experience.

GICS Level 1 sectors:

- Energy
- Materials
- Industrials
- Consumer Discretionary
- Consumer Staples
- Healthcare
- Financials
- Information Technology
- Communication Services
- Utilities
- Real Estate

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

Data Requirements

Provide information on board members that are currently (at the time the assessment is performed) in the board. This means that if the board member has resigned from the board (for example in March 2020) and the assessment in performed in May 2020, do not include them as part of the board.

Include board member who has announced her/his resignation but has not yet resigned (at the time the assessment is performed) as part of the board. She/he should not be included if she/he has already resigned at the time the assessment is performed.

A board nominee should not be included as a board member unless she/he has already been elected at the time of the assessment. (A nominee should only be included if she/he sits for re-election, not if she/he's a nominee for a first mandate).

In this question, we expect disclosure on the number of independent or non-executive members of the board of directors with industry experience and/or disclosure on the industry experience of each individual board member.

The question asks for experience in management, consulting, academia, government or research. Having been on another company's board in the same industry does not qualify as relevant management experience.

Two-tier board structures: This question should only include the supervisory board and not the management board.

Disclosure Requirements

Listed companies and/or publicly owned companies are required to provide links to public reports or corporate websites.

Non-listed companies are required to provide the following evidence, depending on the type of company:

- **Family-owned companies and privately owned companies** are required to provide public reports, corporate websites, or internal documents.
- **Cooperatives** are required to provide public reports, corporate websites, or internal documents.
- **State-owned companies** are required to report on their corporate governance in the public domain as their key stakeholder is the general public.

For companies in the FBN, TCD and IDD industries: If your company has very diversified operations or significant investments into businesses in industries other than the one used for the purpose of this assessment, board experience from another relevant industry can be accepted if an explanation is provided that clearly indicates the other GICS sector and how it relates to the company.

Please note: Answers in the form of 'Confidential additional comments' for any type of non-listed company will not be accepted.

Standards & Frameworks

CSRD - GOV-1 Board Composition & Skills

CEO Compensation – Success Metrics

Flexible: Public information requirements depend on if the company is listed or non-listed.

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

The use of financial metrics to evaluate management performance has become ubiquitous as the benefits of aligning incentives with company performance have been established. Our research shows that the use of revenue, operating profit, and earnings per share are common practices. Differentiation is now only observed in a few aspects, including the use of return metrics (capital efficiency) and relative metrics, which compare the company to its 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 the company have predefined corporate performance indicators relevant for the CEO's variable compensation?
Listed companies are required to provide links to public reports or corporate websites.
Non-listed companies are required to provide internal documents and/or links to public reports or corporate websites.

- ○ Yes, the company has predefined corporate performance indicators relevant for the CEO’s variable compensation.
  - ☐ **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: As part of this question, any corporate performance indicator that is used to determine the CEO's variable compensation should be indicated. Please only include metrics that apply to the CEO's compensation, not metrics that are selectively used for other senior executives or specialist senior managers at a lower level (such as CFO or COO).

Financial metrics: Financial returns refer to capital efficiency (capital is the source of funds, debt, equity, etc.). Therefore, financial returns always use an income statement profit metric (e.g., Earnings Before Interest and Tax, income, operating income) divided by a balance sheet metric (e.g., assets (entire balance sheet), equity, total capital (debt plus equity), invested capital. We do not accept revenue growth, net profit after taxes, earnings per share, and dividends per share. Acceptable financial metrics include return on assets, return on equity, return on invested capital.

Data Requirements

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

Debt / EBITDA and Economic Value Added (EVA) are some examples of acceptable financial return metrics.

In case the company doesn’t pay variable compensation (has a policy to not pay variable compensation), please mark **"The question is not applicable to the company".**

If the company is a REIT company managed by a third-party organization, with zero employees or a small number of employees and the company does not provide cash compensation to any of their named executive officers or other officers / no executives, please mark **"The question is not applicable to the company".**

If the company is a limited partnership entity with no employees of its own and is managed by a general partner, please mark **"The question is not applicable to the company".**

Disclosure Requirements

Listed and/or publicly owned companies are required to provide links to public reports or corporate websites.

Non-listed companies are required to provide the following evidence, depending on the type of company:

- **Family-owned companies and privately owned companies** are required to provide public reports, corporate websites, or internal documents.
- **Cooperatives** are required to provide public reports, corporate websites, or internal documents.
- **State-owned companies** are required to report on their corporate governance in the public domain as their key stakeholder is the general public.

Please note: Answers in the form of 'Confidential additional comments' for any type of non-listed company will not be accepted.

CEO Compensation - Long-Term Performance Alignment

Flexible: Public information requirements depend on if the company is listed or non-listed.

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

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 to determine the CEO's variable compensation. A longer vesting period ensures that the interests of management and the long-term interests of shareholders are better aligned. Additionally, we assess whether the short-term bonus is deferred in shares or stock options.

The economic alignment of management with the long-term performance of the company is an essential component of executive compensation. This alignment can be achieved in several ways, including deferral of short-term compensation, time vesting, and long-term performance periods. Alignment with long-term performance is particularly important during periods of short CEO tenure, as the risk of short-termism increases. For example, in 2009, CEOs of S&P 500 companies held their position for an average of 7.2 years. This 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 interests of shareholders are better aligned.

Question Layout

Does the company reports on the performance-based variable compensation system for its CEO?
Listed companies are required to provide links to public reports or corporate websites.
Non-listed companies are required to provide internal documents and/or links to public reports or corporate websites

- ○ Yes, the company reports on the performance-based variable compensation system for its CEO.

Aspects	Values
Deferral of bonus for short-term CEO compensation Please indicate the percentage of the short-term bonus deferred in the form of shares or stock options:	
Performance period for variable CEO compensation Please indicate the longest performance period covered by the executive compensation plan: ☐ The company has a clawback provision in place. Please specify:	
Time vesting for variable CEO compensation Please indicate the longest time vesting period for variable CEO compensation:	

Question-Specific Guidance & Definitions

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

Deferred bonus: This type of compensation is an arrangement in which a portion of an employee's income is paid out at a later date after which the income was earned during a set performance period.

Performance period: This refers to a performance-based pay-out structure of variable compensation for the current period x, which is dependent on achieving targets in the following periods (x+1, x+2, x+3, etc.). Please note that option- and stock-based compensation for which the number of options or stocks rewarded is not dependent on future performance does not count as performance vesting but as time vesting.

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

Clawback/recoupment provision: This is a policy that allows a company to recover performance-based compensation for some period of time after compensation awards are granted. Clawback/Recoupment provisions may apply to short and/or long-term awards. The circumstances and conduct that would trigger clawback/recoupment 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: This 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 payout is independent of the coming year's performance. If all long-term incentives are based on future performance, the same figure should be given for the longest performance period and the longest time vesting period.

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

Exceptions to the standard methodology for non-listed companies:

The definition of shares includes non-tradable stock and phantom/synthetic shares that replicate the company’s share practice performance.

Phantom/synthetic shares: A phantom stock is an employee benefit plan that gives selected employees (senior management) many of the benefits of stock ownership without actually giving them any company stock. This is sometimes referred to as shadow stock. Phantom stock, also known as synthetic equity, has no **inherent** requirements or restrictions regarding its use, allowing the organization to use is however it chooses.

Data Requirements

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

The question applies to **CEO compensation only**.

In case the company doesn’t pay variable compensation (has a policy to not pay variable compensation), please mark "The question is not applicable to the company."

If the company is a REIT company managed by a third-party organization, with zero employees or a small number of employees and the company does not provide cash compensation to any of their named executive officers or other officers / no executives, please mark "The question is not applicable to the company."

If the company is a limited partnership entity with no employees of its own and is managed by a general partner, please mark "The question is not applicable to the company."

Disclosure Requirements

Listed and/or publicly owned companies are required to provide links to public reports or corporate websites.

Non-listed companies are required to provide the following evidence, depending on the type of company:

- **Family-owned companies and privately owned companies** are required to provide public reports, corporate websites, or internal documents.
- **Cooperatives** are required to provide public reports, corporate websites, or internal documents.
- **State-owned companies** are required to report on their corporate governance in the public domain as their key stakeholder is the general public.

Please note: Answers in the form of ‘Confidential additional comments’ for any type of non-listed company will not be accepted.

CEO-to-Employee Pay Ratio

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

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

In the aftermath of the global financial crisis, many countries have implemented or are planning to implement reforms regarding the transparency of executive compensation. Transparency is vital to restore trust among shareholders, employees, customers and other stakeholders, and hence to improve corporate reputation. Companies that are taking a proactive approach to align their reporting with this global trend and improving 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 as to whether executive compensation is justified.

In this question, we assess whether companies (including non-US-based companies) disclose this information. The Dodd-Frank Wall Street Reform and Consumer Protection Act (Pub.L. 111-203, H.R. 4173) is a federal statute in the US that was signed into law by President Barack Obama on July 21, 2010. The Dodd-Frank Act clearly states that, in terms of CEO compensation disclosure, a company is obliged to disclose to the shareholders: the median of the annual total compensation of all employees of the issuer, except the CEO (or any equivalent position); the annual total compensation of the CEO (or any equivalent position); and the ratio of the median of the annual total to the total CEO compensation.

Question Rationale

Question Layout

Does the company track the ratio of the median or mean employee compensation or the total annual compensation of the CEO?

- Yes, the company tracks the ratio of the median or mean employee compensation or the total annual compensation of the CEO. Please indicate where this information is available.
  Currency:

CEO compensation	Total CEO compensation	
Please indicate the total annual compensation of the CEO (or any equivalent position): *Total compensation includes fixed and variable compensation as well as all other parts of compensation which are required to be included in total remuneration reporting according to national accounting standards*		
Employee compensation	**Median employee Compensation**	**Mean employee compensation**

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

The ratio between the total annual compensation of the CEO and the mean or median employee compensation:

CEO compensation divided by the mean or median employee compensation

☐ The data is publicly available.

Question-Specific Guidance & Definitions

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

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

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

The ratio should be calculated as the total CEO compensation divided by the median or mean employee compensation (i.e., the reported figure should be the multiple of the employee compensation).

Data Requirements

While we expect the figure to cover the entirety of a company's global operations, for this question, companies may make **cost-of-living adjustments** to the compensation of employees residing in a jurisdiction different from that of the CEO, provided that these adjustments are applied to *all* such employees included in the calculation, and are explained in the **company comment section,** and that the raw, unadjusted data is also provided in the company comment section.

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

If the company has fewer than 100 employees (e.g., investment vehicles and holding companies), this question should be marked "The question is not applicable to the company".

If the company reports that its CEO doesn't have any fixed compensation or/and mark 0 or 1 under the "Total CEO Compensation", please mark "The question is not applicable for the company."

If the company is a REIT company managed by a third-party organization with zero employees, please mark "The question is not applicable to the company."

If the company is a limited partnership entity with no employees of its own and is managed by a general partner, please mark "The question is not applicable to the company."

Disclosure Requirements

Disclosure requirements for partially public question

For listed companies: Additional credit will be granted for relevant publicly available evidence covering one of the following aspects of this question:

- Annual compensation of CEO **and** median (mean) annual compensation of all employees except the CEO (or any equivalent position).
- Ratio between the total annual compensation of the CEO and the median (mean) employee compensation.

For **non-listed companies:** Internal documents covering the above-mentioned information are generally accepted.

References

The Dodd–Frank Wall Street Reform and Consumer Protection Act (Pub.L. 111-203, H.R. 4173), www.gpo.gov/fdsys/pkg/BILLS-111hr4173enr/pdf/BILLS-111hr4173enr.pdf (p. 529)

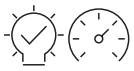
Standards & Frameworks

SFDR - A - CEO Pay Ratio

Management Ownership

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

Assessment Focus



Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

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

Question Layout

Does the company's CEO and other executive committee members hold company shares?
Listed companies are required to provide links to public reports or corporate websites.
Non-listed companies are required to provide internal documents and/or links to public reports or corporate websites.

- Yes, the company's CEO and other executive officers hold company shares.

Position	Name(s)	Multiple of base salary	Supporting evidence	Public reporting
Chief Executive Officer				☐ Yes
Average across other executive committee members owning shares				☐ Yes

Question-Specific Guidance & Definitions

Shares: Shares are units of equity ownership in a corporation. In this question, we accept publicly traded shares as well as other forms of participation in equity ownership.

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

Data Requirements

This question assesses the stock ownership level of the CEO and other executive committee members compared to their respective base salaries.

Chief Executive Officer: Base salary and shareholdings of the CEO or shareholding expressed as a multiple of the CEO's base salary.

Other executive committee members: Base salary and shareholdings of at least two members of the executive committee or average shareholdings of the executive committee expressed as a multiple of their base salaries. Please note that the metrics need to be reported for each named executive individually (a consolidated figure is not sufficient).

If the company has multiple CEOs calculate the average of their salaries/shareholdings if data is available for both.

If the company's CEO is relatively new to the company, please use the latest fiscal year information for the previous CEO until the new CEO has served for a full fiscal year.

The shares of all the executives for whom the ownership information is available publicly even if they are no longer serving in the company (retired in the previous FY) should be considered for the calculation of management ownership.

Performance stock units (PSUs), Restricted stock units (RSUs), Deferred stock units (DSUs), Phantom stocks and share options are not to be included in the calculations for this question. Other types of unvested shares should also not be included in the calculation. Only company's shares that are currently owned should be counted. As such, this question does not take into account ownership through a family trust, charitable trust, or other forms of ownership which do not link to the stock. However, joint stocks owned by the CEO/executive with spouse or others should be included in the calculation.

Shareholdings of executive directors in company's subsidiaries are not to be included in the calculation.

Calculations:

CEO multiple calculation: Share price at the end of the FY * number of shares held by the CEO / base salary of CEO

Other executives' multiple calculation: (share price at the end of the FY * the number of shares held by executive A / base salary of executive) + (share price at the end of the FY * the number of shares held by executive B / base salary of executive) + (…) / number of executives with shareholdings reported

For US-based companies, please use the share price at the time of the shareholder meeting, and the salary and number of shares held at that time for the purpose of calculations.

If the CEO does not have a base salary (or has a nominal salary such as 1 dollar, it will not be possible to calculate the multiple properly. In this case, please mark "The question is not applicable to the company".

If the company is a REIT company managed by a third-party organization, with zero employees or a small number of employees and the company does not provide cash compensation to any of their named executive officers or other officers / no executives, please mark "The question is not applicable to the company".

If the company is a limited partnership entity with no employees of its own and is managed by a general partner, please mark "The question is not applicable to the company".

Non-listed companies: For state-owned companies, this question can be marked "The question is not applicable to the company" because the company will still be assessed for having government ownership in question - "Government Ownership".

Disclosure Requirements

For listed companies, if no public documentation is provided, internal documentation should be provided that includes the base salary and shareholdings reported as well as the calculations.

For non-listed companies, internal documents are generally accepted.

Disclosure requirements for partially public question:

Additional credit will be granted for public reporting of the following parts of the question:

- CEO's shares as a multiple of base salary.
- Average across other executive committee members owning shares as a multiple of base salary.

Please note: Answers in the form of 'Confidential additional comments' for any type of non-listed company will not be accepted.

References

Academic research (e.g., Bhagat & 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."
- Gugler, Mueller, & Yurtoglu (2008), "The Effects of Ownership Concentration and Identity on Investment Performance: An International Comparison."

Management Ownership Requirements

Flexible: Public information requirements depend on if the company is listed or non-listed.

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

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 & Bolton, 2008) suggests that stock ownership by senior management positively correlates with future operating profit.

Question Layout

Does the company have specific stock ownership requirements for the CEO and other members of its executive committee?
Listed companies are required to provide links to public reports or corporate websites.
Non-listed companies are required to provide internal documents and/or links to public reports or corporate websites.

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

Aspect	Multiple of the annual base salary
The CEO has to build up a share ownership of:	
Other members of the executive committee besides the CEO must build up a share ownership of:	

Data Requirements

This 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.

If the company is a REIT company managed by a third-party organization, with zero employees or a small number of employees and the company does not provide cash compensation to any of their named executive officers or other officers / no executives, please mark "The question is not applicable to the company".

If the company is a limited partnership entity with no employees of its own and is managed by a general partner, please mark "The question is not applicable to the company".

Non-listed companies: For state-owned companies, this question can be marked "The question is not applicable to the company" because the company will still be assessed for having government ownership in question - "Government Ownership".

Disclosure Requirements

Listed and/or publicly owned companies are required to provide links to public reports or corporate websites.

Non-listed companies are required to provide the following evidence, depending on the type of company:

- **Family-owned companies and privately owned companies** are required to provide public reports, corporate websites, or internal documents.
- **Cooperatives** are required to provide public reports, corporate websites, or internal documents.
- **State-owned companies** are required to report on their corporate governance in the public domain as their key stakeholder is the general public.

Exceptions to the standard methodology for non-listed companies: The definition of shares includes non-tradable stock and phantom/synthetic shares that replicate the company's share practice performance.

Phantom/synthetic shares: A phantom stock is an employee benefit plan that gives selected employees (senior management) many of the benefits of stock ownership without giving them any company stock.

This is sometimes referred to as shadow stock. Phantom stock, also known as synthetic equity, has no **inherent** requirements or restrictions regarding its use, allowing the organization to use it however it chooses.

Please note: Answers in the form of 'Confidential additional comments' for any type of non-listed company will not be accepted.

References

Academic research (e.g., Bhagat & 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."

Government Ownership

Flexible: Public information requirements depend on if the company is listed or non-listed.

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

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

Question Layout

Does the company report whether governmental institutions own more than 5% of the total voting rights of the company?
Listed companies are required to provide links to public reports or corporate websites.
Non-listed companies are required to provide internal documents and/or links to public reports or corporate websites.

- Yes, individual governmental institutions own more than 5% of the company's voting rights. Please indicate where this information is available.

Total percentage of government ownership	Details for government ownership (e.g. calculation, members, organizations, etc., if available):

Golden shares for governmental institutions
Does the company have golden shares for governmental institutions?

- Yes, the company has golden shares for governmental institutions.
- No, the company does not have any golden shares for governmental institutions.

- No governmental institutions own more than 5% of the total voting rights. Please indicate where this information is available.

Question-Specific Guidance & Definitions

Government ownership: We adopt the Organization for Economic Co-operation and Development (OECD) definition for government institutions and ownership (2005): “Enterprises where the state has significant control through full, majority, or significant minority ownership. In this definition, we include state-owned enterprises (SOEs) which are owned by the central or federal government, as well as SOEs owned by regional and local governments.”

This definition includes government pension funds, state asset management funds, development banks (federal and local), and sovereign wealth funds.

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

Data Requirements

Government ownership requirements:
Holding companies that own stakes higher than 5% in other companies and that are in turn are majority owned by a government or governmental institution should be reported in this question. For example, a holding company (company A) is 70% government owned. Company A owns 40% of the voting rights in company B. Company B should report 40% government ownership in this question.

In this question, we expect information on the following:

- Total percentage of government ownership (sum of the percentage of individual governmental institutions owning more

than 5% of voting rights) or disclosure of all individual governmental institutions owning more than 5% of voting rights
- Golden shares for governmental institutions (only if the corresponding option is marked).

Disclosure Requirements

Listed and/or publicly owned companies are required to provide links to public reports or corporate websites.

Non-listed companies are required to provide the following evidence, depending on the type of company:

- **Family-owned companies and privately owned companies** are required to provide public reports, corporate websites, or internal documents.
- **Cooperatives** are required to provide public reports, corporate websites, or internal documents.
- **State-owned companies** are required to report on their corporate governance in the public domain as their key stakeholder is the general public.

Please note: Answers in the form of 'Confidential additional comments' for any type of non-listed company will not be accepted.

References

- Goldeng, Grünfeld & Benito (2008), "The Performance Differential between Private and State Owned Enterprises: The Roles of Ownership, Management and Market Structure."
- Chen, Ghoul, Guedhami, & Wang (2017), "Do State and Foreign Ownership Affect Investment Efficiency? Evidence from privatizations.

Family Ownership

Flexible: Public information requirements depend on if the company is listed or non-listed.

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

Corporate governance systems aim to ensure a company is managed in the interests of its shareholders. In this question, we assess if one or several individuals of a company's founding family are ultimate owners and have more than 5% of the voting rights. Academic research (e.g., Eugster & Isakov, 2016; Corstjens, Peyer & Van der Heyden, 2006) suggests that family ownership is positively correlated with future operating profit.

Question Layout

Does the company report whether any individual founding members or family members, either personally or through other companies or organizations, hold more than 5% of the company's voting rights?

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

- ○ Yes, founding individuals or family members individually own more than 5% of the voting rights. Please indicate where this information is available.

Total percentage of voting rights	Details for the individual/family ownership (e.g. calculation, members, organizations etc. if available):

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

Question-Specific Guidance & Definitions

Significant family ownership: At least one of the founding individuals/family members, personally or through other companies or organizations, must own more than 5% of the voting rights of your company. If no individual owns more than 5%, we do not consider it significant family ownership.

Founding family: The founding family can be one or several individuals or family members. They might not have necessarily set up the company independently. In case a family acquires an existing company and transforms it into a new company, this second family can be considered the "founding family" (e.g., if a company has been acquired, re-named, and rebranded).

Data Requirements

We are looking for *founding* family ownership, to assess whether descendants of the founding families are current owners with significant voting rights.

Total percentage of voting rights of founding family members, personally or through companies/organizations to be reported:

- If one family member owns more than 5%, the respondent shall report the total of all family members' holdings, e.g., add the person(s) with individual ownership of over 5% of voting rights plus those who individually own less than 5% of voting rights. Please report the total even if there is no pooling agreement in place.
- If the family owns more than 5% of the company through a holding company, the family must own at least 50% of the holding company that in turn holds shares of the company.
- If none of the family members individually own more than 5% of the company's voting rights, please mark "No, founding individuals or family members individually do not have more than 5% of the voting rights".
- If any of the founding members or their families still hold more than 5%, this should be reported.
- if the company was not founded by a family (see "Key

definitions"), please mark "The question is not applicable to the company".

Specific data requirements for non-listed companies

- For family-owned companies, the distribution of voting rights can also be evaluated if there are no publicly traded shares, as there exist other types of shares/instruments that correspond to voting rights.

Disclosure Requirements

Listed and/or publicly owned companies are required to provide links to public reports or corporate websites.

Non-listed companies are required to provide the following evidence, depending on the type of company:

- **Family-owned companies and privately owned companies** are required to provide public reports, corporate websites, or internal documents.
- **Cooperatives** are required to provide public reports, corporate websites, or internal documents.
- **State-owned companies** are required to report on their corporate governance in the public domain as their key stakeholder is the general public.

Please note: Answers in the form of 'Confidential additional comments' for any type of non-listed company will not be accepted.

References

- Credit Suisse (2017), The CS Family 1000
- Eugster & Isakov (2016), Founding family ownership, stock market returns and agency problems.
- Corstjens, Peyer & Van der Heyden (2006), Performance of Family Firms: Evidence from US and European Firms and Investors.

ESG Governance Oversight

Flexible: Public information requirements depend on if the company is listed or non-listed.

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

The purpose of this question is to assess how companies oversee ESG and sustainability matters at the board of directors and executive committee levels. As stakeholders increasingly prioritize sustainability practices, integrating ESG factors into corporate strategy becomes necessary for long term value creation. This scrutiny ensures that businesses effectively manage risks, seize opportunities, and uphold their commitments to responsible business conduct.

Question Layout

Does the company have governance mechanisms in place to oversee ESG/sustainability issues?
Listed companies are required to provide links to public reports or corporate websites.
Non-listed companies are required to provide internal documents and/or links to public reports or corporate websites.

- ○ Yes, the company has governance mechanisms to oversee ESG/sustainability issues.

  Board oversight
  - ☐ There is board level responsibility to maintain oversight of ESG/sustainability issues:
    - ○ A dedicated ESG/sustainability committee
    - ○ Another board level committee (e.g. Audit Committee)

  Executive oversight
  - ☐ There is an executive level committee established to oversee ESG/sustainability issues:
    - ○ A dedicated ESG/sustainability committee
    - ○ One of the responsibilities of another executive level committee
  - ☐ There is a designated role to oversee ESG/sustainability issues:
    - ○ C-suite (e.g., Chief Sustainability Officer)
    - ○ Designated role below C-suite

Question-Specific Guidance & Definitions

Board-level committee with oversight: Assigned committee, formed of board members only and with at least one independent member, with responsibility for overseeing ESG and sustainability issues.

Executive-level committee with oversight: Assigned committee, formed of individuals within one reporting level from the CEO, with responsibility for overseeing ESG and sustainability issues.

Designated role: A designated individual with responsibility for ESG matters.

Data Requirements

To answer this question, we expect a focus on the organizations general ESG and sustainability management and not topic-specific, such as Climate or Occupational Health and Safety oversight.

Board oversight: Board oversight refers to a board-level committee responsible for overseeing ESG and Sustainability issues. Evidence that the committee oversees Sustainability and ESG issues should be available in the relevant section in TCFD, CDP or other reports. In the case that the company has a two-tier board structure, we expect the Supervisory board to hold ESG oversight responsibility.

If the board committee is different from a ESG and sustainability-specific committee, the responsibility needs to be clearly described within public reporting.

In order to accept the committee as a board-level committee, all members must be part of the board. If the committee is made up of both board members and management, please record this committee in the “Management Responsibility” section of the question.

For two-tier boards, the board-level committee must be formed of members of the supervisory board.

Management responsibility: Management responsibility refers to the highest level of management with dedicated responsibility for managing ESG and Sustainability issues.

For two-tier boards, management responsibility can be at the management board level.

Disclosure Requirements

The document(s) you have attached will be used to verify your response. Any response that cannot be verified in the attached document(s) will not be accepted.

Listed and/or publicly owned companies are required to provide links to public reports or corporate websites.
Non-listed companies are required to provide the following evidence, depending on the type of company:

- **Family-owned companies and privately owned companies** are required to provide public reports, corporate websites, or internal documents.
- **Cooperatives** are required to provide public reports, corporate websites, or internal documents.
- **State-owned companies** are required to report on their corporate governance in the public domain as their key stakeholder is the general public.

Please note: Answers in the form of "Confidential additional comments" for any type of non-listed company will not be accepted.

References

CSRD ESRS 2 General disclosures 20a
CSRD ESRS 2 General disclosures 21
IFRS S1 Governance - 27

Standards & Frameworks

CSRD - GOV-1 Governance Bodies Role, GOV-2 Board Sustainability Oversight
TNFD - Governance A
UNGC - G5

Materiality

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

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

Materiality Analysis

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

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

Question Layout

Does the company disclose details of its materiality determination process and how the materiality analysis is conducted?

- ○ Yes, the company has disclosed its materiality analysis process. Please indicate where this information is available in **public reporting or corporate website.**
  - ☐ Materiality analysis conducted/reviewed:
    - ○ At-least annually
    - ○ Once every 2 or more years
    - ○ Not known
  - ☐ Involvement of external stakeholders in identifying the material issues

- ☐ Material issues are prioritized in a materiality matrix or any other form
- ☐ Materiality assessment integrated in company's enterprise risk management process
- ☐ Assessment conducted is based on the principle of double materiality or considers internal impact on the business as well as external impact on society and the environment
- ☐ Materiality assessment process verified by a third-party assurance provider
- ☐ Materiality assessment results signed off by:
  - ○ Board of directors
  - ○ Executive management

Question-Specific Guidance & Definitions

Materiality: Any factor that has or can have an impact on value creation and the company's financial performance. These could be economic, environmental or social in nature.

Internal impact: The impact on a company's business operations, cash flows, legal or regulatory liabilities, and access to capital. It can also be perceived as an improvement or maintenance of a company's reputation and relationships with key stakeholders, society and the environment.

External impact: The direct and indirect damage or benefits to societal stakeholders and the environment by a company's business activities, business model, products and services in the short and long term.

Materiality assessment: A materiality assessment is an approach that identifies critical economic, environmental and social issues that have a significant impact on a company's business performance.

Materiality assessment frequency: We expect companies to conduct or review materiality assessments and to report the results in at least one of the two most recent annual or sustainability reports.

Data Requirements:

Copy of, or link to, the company's website, annual report, sustainability report or other public communication.

1. Materiality analysis conducted/reviewed:

Our expectations

- Public disclosure on the frequency of materiality analysis conducted or reviewed. The information should be available in at least one of the two most recent annual or sustainability reports.

Not acceptable:

- References to public materiality analysis reports that are more than 2 years old.

2. Involvement of external stakeholders:

Our expectations:

- if external stakeholders are involved in the materiality analysis process, it should be clearly stated in the company's public documents/website.
- Information should be available in the section where materiality analysis was discussed.

Not acceptable:

- Only stating that stakeholders are involved without any reference to the type, i.e., external or internal stakeholders
- General stakeholder engagement information without any reference to how it is integrated with the materiality assessment process.

3. Prioritization of material issues:

Our expectations:

- Material issues should be publicly disclosed and prioritized either in a matrix format or any other priority listed format

Not acceptable:

- Only stating that a materiality determination/prioritization process was conducted without disclosing the top material issues.

4. Integration of materiality assessment results in enterprise risk management (ERM):

Our expectations:

- Public disclosure on the integration of materiality assessment results within the overall risk management process.
- Description of how identified material issues are linked with the company's significant risks.

Not acceptable:

- General disclosure on environmental, social and governance related risks without specifying their linkage to materiality assessment results.
- ERM results used as inputs to materiality process

5. Assessment conducted is based on the principle of double materiality, i.e., considers internal impact on the business as well as external impact on society and the environment

Our expectations:

- Indication of considering external and internal impacts on the materiality assessment in company public reports/website
- A materiality matrix depicting both: the impact of the company's business activity on society, the environment, and people and the internal impact on the business.

Not acceptable:

- General disclosure on impact valuation analysis without reference to its link with identified material issues

6. Materiality assessment process verified by third-party assurance provider:

Our expectations:

- Public disclosure on assurance report that clearly specifies the audit of materiality assessment covered in its scope
- A statement specifying external assurance of the materiality assessment process

Not acceptable:

- Disclosure of the involvement of an external consultant in the materiality assessment process
- Assurance statement without a clear indication of materiality assessment under its scope

7. Materiality assessment metrics signed off by the Board of directors or Senior Management:

Our expectations:

Review, sign-off, approval, and oversight of materiality assessment process by:

- the board of directors, a sub-committee of the board of directors, or a single named director
- an executive manager/executive committee
- The materiality assessment results are signed by the respective board/executive representative(s)/
- A general statement specifying sign-off/approval of a materiality assessment result is also sufficient

Not acceptable:

- Executive manager/sustainability manager involvement in the materiality assessment process.

Disclosure Requirements

- The document(s) you attach will be used to verify your response.
- The supporting documents need to be available in the public domain.
- Any response that cannot be verified in the attached public document(s) or web link will not be accepted.

References

The double-materiality concept Application and Issues - GRI

EU Guidelines on non-financial Reporting directive – 2.2 (2019)

Corporate Sustainability Reporting Directive (CDRD)

Double Materiality Guidelines - EFRAG

The Two Dimensions of ESG Materiality - S&P

Statement-of-Intent-to-Work-Together-Towards-Comprehensive-Corporate-Reporting.pdf (sasb.org) – CDP, CDSB, GRI, IIRC and SASB

Standards & Frameworks

TNFD - Risk Management A(i), Risk Management A(ii)

Material Issues for Enterprise Value Creation

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

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

Companies are asked to make a business case and should focus on the economic, environmental or social issues that are most important for business performance. Companies should indicate which of the three value drivers are impacted by the factors of revenues, costs or risk, and which strategies, products or initiatives are linked to these factors.

Question Layout

Does the company report the three most important material issues (economic, environmental, or social) that have the greatest impact on its business and how these issues impact the business and serve as significant determinants of long-term value creation?

- ○ Yes, the company reports the three most important material issues that have the greatest impact on its business and how these issues impact the business and serve as significant determinants of long-term value creation. Please indicate where this information is available in **public reporting or corporate website.**

Aspects	Material issue 1	Material issue 2	Material issue 3
Material risk or opportunity Please specify the material risk or opportunity impacting the business:	Please select the category of the material issue belongs to: Dropdown menu: Corporate Governance & Ethics Cyber Security Policy Influence Risk & Crisis Management Supply Chain Management Tax Strategy Biodiversity Climate Transition & Physical Risks Environmental Policy & Management Energy Waste & Pollutants Water Society & Community Relations Customer Relations Occupational Health & Safety Labour Practices Human Capital Management Human Rights Privacy Protection Product / Service Quality & Safety Sustainable Raw Materials Sustainable Products & Services	Please select the category of the material issue belongs to: Dropdown menu: Corporate Governance & Ethics Cyber Security Policy Influence Risk & Crisis Management Supply Chain Management Tax Strategy Biodiversity Climate Transition & Physical Risks Environmental Policy & Management Energy Waste & Pollutants Water Society & Community Relations Customer Relations Occupational Health & Safety Labour Practices Human Capital Management Human Rights Privacy Protection Product / Service Quality & Safety Sustainable Raw Materials Sustainable Products & Services	Please select the category of the material issue belongs to: Dropdown menu: Corporate Governance & Ethics Cyber Security Policy Influence Risk & Crisis Management Supply Chain Management Tax Strategy Biodiversity Climate Transition & Physical Risks Environmental Policy & Management Energy Waste & Pollutants Water Society & Community Relations Customer Relations Occupational Health & Safety Labour Practices Human Capital Management Human Rights Privacy Protection Product / Service Quality & Safety Sustainable Raw Materials Sustainable Products & Services
Business case Please describe how the material issue is critical to the business and select the type of impact:	☐ The company reports the business case for this material issue: Type of impact: Dropdown menu: Revenue Risk Cost Opportunity	☐ The company reports the business case for this material issue: Type of impact: Dropdown menu: Revenue Risk Cost Opportunity	☐ The company reports the business case for this material issue: Type of impact: Dropdown menu: Revenue Risk Cost Opportunity
Business strategies Please specify the primary business strategies, initiatives or products that address this issue:	☐ Yes, the company describes its strategy for addressing the impact on the business:	☐ Yes, the company describes its strategy for addressing the impact on the business:	☐ Yes, the company describes its strategy for addressing the impact on the business:

Question-Specific Guidance & Definitions

Material issue: A material issue is a sustainability factor that has or will have an impact on the company's value drivers, competitive position and long-term shareholder value creation.

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

Materiality assessment frequency: We expect companies to conduct a materiality assessment and to report the results in at least one of the two most recent annual or sustainability reports.

Data Requirements

1. Material Issue

Our expectations:

- Companies have conducted a materiality analysis and identified the most important issues driving long-term performance.
- Companies clearly define the three most material economic, environmental, or social issues driving long-term value creation.

Not acceptable:

- Purely financial metrics/issues (net profit, cash flow, earnings per share, product sales).
- Operational business metrics/issues (e.g., market expansion, efficient use of capital, operational excellence).
- General issues without a description of the specific sub-issues that might impact the company's performance (e.g., macroeconomic conditions, long-term shareholder value).
- Please note that companies that do not provide an acceptable material issue do not receive points for any of the sub-questions related to that material issue.

2. Business Case

Our expectations:

The business case should contain the following information:

- A clear link between the material issue and the business case.
- Clear explanation of why the issue is material to the company's performance in terms of cost/revenue/risk/opportunity. (e.g., cost savings, revenue generation, operational efficiency, operational risks with direct impact on financial performance).

Not acceptable:

- The business case is not linked to the material issue.
- The Business case does not link the material issue to the company's performance in terms of costs, revenues, risks, or opportunity.
- The business case is describing the material issue and its importance for the society/environment but does not provide information on why the issue is relevant to the company's performance or business (e.g., impact of global warming on society).
- The business case and impact are not specific to your company (e.g., discussion on the material issue's impact on the industry).

3. Business Strategies

Our expectations:

- The company provides a clear explanation of the strategies, initiatives, or products or services through which it addresses the material issue.

Not acceptable:

- Strategies, initiatives, or products or services that do not directly address the material issue.
- Strategies that are not clearly described (e.g., human resources-oriented management).
- Description of the current situation without providing the strategies or products to address this situation.
- Provision of a target instead of a strategy, initiative, or product (e.g., zero fatalities or injuries).

Disclosure Requirements

- The document(s) you attached will be used to verify your response.
- The supporting documents need to be available in the public domain.
- Any response that cannot be verified in the attached public document(s) or web link will not be accepted.

Standards & Frameworks

TNFD - Strategy A.
UNGC - S2, HR/L1, HR/L1.1, E10

Materiality Metrics for Enterprise Value Creation

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

This question assesses the extent to which companies are disclosing their progress toward established targets or metrics linked to material issues. To ensure that the company is managing its performance in relation to the top material issues identified over the long term, this question asks for the targets/metrics the company uses to measure its performance over time and whether the company has linked its executive compensation to these issues.

Question Layout

Does the company have targets or metrics linked to the top three material issues and does it disclose the progress of these targets or metrics? Does the company link executive compensation with the targets or metrics involved?

- ○ Yes, the company reports on targets/metrics linked to the top three material issues. Please indicate where this information is available in **public reporting or corporate website.**

	Material issue 1		Material issue 2		Material issue 3	
Material issue Please specify the material issue: (The issues should be same as marked in the question Material Issues)						
Target Does the company have a target or metric to measure its progress on this issue in a systematic way? Please specify where this target or metric is available in public reporting:	☐	Target set linked to material issue:	☐	Target set linked to material issue:	☐	Target set linked to material issue:
Target year Please specify the year for the target						
Progress Does the company disclose the progress on targets/metrics? Please specify where this target or metric is available in public reporting:	☐	Progress on target specified:	☐	Progress on target specified:	☐	Progress on target specified:
Executive compensation Is this metric or target used to determine the compensation of executive committee members? If yes, please specify how this metric is used and provide a relevant public reference showing how these metrics are applied to executive compensation.	☐	Target/metric linked to executive compensation	☐	Target/metric linked to executive compensation	☐	Target/metric linked to executive compensation

Data Requirements

1. Material Issue:

Our expectations:

- Companies have conducted a materiality analysis and identified the most important issues driving long-term performance.
- Companies clearly define the three most material economic, environmental, or social issues driving long-term value creation.
- The material issues should be the same as identified in question 1.3.2

Not acceptable:

- Purely financial metrics/issues (e.g., net profit, cash flow, earnings per share, product sales).
- Operational business metrics/issues (e.g., market expansion, efficient use of capital, operational excellence).
- General issues without a description of the specific sub-issues that might impact the company's performance (e.g., macroeconomic conditions, long-term shareholder value).

Please note: Companies that do not provide an acceptable material issue will not receive points for any of the questions related to that material issue.

2. Target/Metric:

Our expectations:

- The metric or target is linked to the material issue and should be publicly available.
- Both long-term (at least three years) and short-term targets are acceptable.
- The metric or target, and how they are used are clearly described.

Target set in the past year is acceptable if:

- The company's target is by necessity, ongoing- (such as zero fatalities). Please indicate the current year as the target year and provide an explanation in the company comment section.
- The current reporting year (e.g., 2021) corresponds to the target's finishing year.
- The company publishes its report biannually or the company's reporting does not match with CSA assessment cycle.

Not acceptable:

- Targets/metrics are not linked to the material issue.
- Vague targets or targets with progress that cannot be measured (e.g., ensure a good working environment, reduce workplace accidents).
- Targets set in the past year and are not valid anymore

3. Target Year:

Our expectations:

- The target year should be available in the public domain

Indicating the current reporting year as the target year is acceptable if:

- The company's target is by necessity, ongoing- (such as zero fatalities). Please indicate the current year as the target year and provide an explanation in the company comment section.

Indicating past reporting years as the target year is acceptable if:

- If the company's long-term target is by necessity, ongoing- (such as zero fatalities). Please indicate the current year as the target year and provide an explanation in the company comment section.
- The current reporting year (e.g., 2021) corresponds to the target's finishing year.
- If the company publishes its report biannually or the company's reporting does not match with CSA assessment cycle.

4. Executive Compensation:

Our expectations:

- The metric or target used for determining executive compensation is clearly defined and linked to the material issue. It should also be publicly available.
- Executive compensation is linked to the performance on the material issue, metric, or target (e.g., as part of an executive scorecard).
- There is a clear indication that the performance on the provided material issue, target, or metric is linked to the compensation of the executive management, and not only of the respective line managers.

Not acceptable:

- The executive compensation is linked to the company's general corporate social responsibility policy or environmental performance.
- The metric/target is used for determining management performance but there is no explanation of how performance is linked to executive compensation.
- The metric/target indirectly contributes to the company's general financial performance metrics (e.g., executive compensation is linked to earning before interest and tax, as improved operational eco-efficiency reduces operational costs and therefore increases EBIT).

Disclosure Requirements

- The document(s) you attached will be used to verify your response.
- The supporting documents need to be available in the public domain.
- Any response that cannot be verified in the attached public document(s) or web link will not be accepted.

Standards & Frameworks

TNFD - Governance A., Strategy A.

UNGC - G8

Material Issues for External Stakeholders

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

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

This question recognizes companies that identify and value the externalized impact generated on societal stakeholder groups and/or the environment because of their main business activities. The impact evaluated usually related to environmental and/or social externalities can be positive (external benefits) or negative (external costs). The impact generated can be direct, indirect, intended or unintended and are usually not internalized as part of the costs associated with the business activity.

While companies have made significant progress in tracking and reporting input and output measures, such as water use and CO2 emissions, the external social and environmental impact resulting from business operations, products, services or supply chain operations are significantly underreported. Impact valuation helps companies to increase awareness of externalities associated with their business and represents a management tool that can help orient company strategies toward sustainable activities, solutions and sourcing. Investors are also interested in how companies measure and understand their own impact, and how companies use this information in their internal decision-making for long-term value creation. Over time, external impact on society and the environment also translates into internal impact on a company, including its financial value drivers. In a broader understanding of enterprise value today, including stakeholder perspectives, the interrelation between external and internal impact is a core part of determining materiality.

Question Layout

Does the company conduct a materiality analysis to identify and value the positive/negative impact on external stakeholders associated with its business operations, products/services and/or its supply chain?

- ○ Yes, the company has assesses positive and/or negative impacts on external stakeholders resulting from its business operations, products and services and/or supply chain.

Aspects	Impact 1	Impact 2
Supporting evidence		
Public reporting	☐ Yes	☐ Yes
Material issue for external stakeholders Please specify the material issue that generates a positive/negative impact on external stakeholders.	Please select the category of external impact belongs to: [Dropdown: 22 options]	Please select the category of external impact belongs to: [Dropdown: 22 options]
Cause of the impact Please specify which part of your business is responsible for the external impact and the coverage of the business activity that has been considered in the assessment.	Business value chain: ☐ Operations ☐ Products/services ☐ Supply chain Business activity coverage: Dropdown menu: More than 50% of business activity Less than 50% of business activity Not known	Business value chain: ☐ Operations ☐ Products/services ☐ Supply chain Business activity coverage: Dropdown menu: More than 50% of business activity Less than 50% of business activity Not known
External stakeholder(s)/impact area(s) evaluated Please select the stakeholder(s) group or impact areas evaluated.	☐ Environment ☐ Society ☐ Consumers/end-users ☐ External employees (e.g. organizations in the supply chain, contractors)	☐ Environment ☐ Society ☐ Consumers/end-users ☐ External employees (e.g. organizations in the supply chain, contractors)
Topic relevance on external stakeholders Please provide a brief rationale why the external impact assessed is material to external societal stakeholders or the environment. Also indicate the type of impact assessed along with public disclosure, if available.	☐ Materiality of externalized impact on stakeholders assessed. Type of impact: ○ Positive ○ Negative ○ Both combined	☐ Materiality of externalized impact on stakeholders assessed. Type of impact: ○ Positive ○ Negative ○ Both combined

Question-Specific Guidance & Definitions

Material issue for external stakeholders: The material significance of an environmental, social and governance subject in terms of external impact is defined through an analysis of a company's business activities, business model, products, and services. Impacts are evaluated considering the direct and indirect effect on societal stakeholders and/or the environment- in the short and long term. The material issues for external stakeholders and their associated impact are usually identified by evaluating their breadth, magnitude and the depth of the impact on societal stakeholders and the environment.

Cause of the impact: This refers to the company's operations, products/services, or supply chain activities that are responsible for causing external impacts. The coverage associated with these business activities refers to the share of company operations, products/services, or supply chain activities considered as part of the impact evaluations.

External stakeholders/impact areas evaluated: This refers to the type of external stakeholder group or an external area experiencing the impact caused by the company through its business activities. External groups or areas include the environment, society, consumers/end-users, and external employees (e.g., organizations in its supply chain, or contractors). It is possible to consider the impact on several areas or groups, such as the environment and society or the environment, consumers and society. As this question assess material issues for external stakeholders, information regarding internal stakeholders, such as employees or shareholders is not acceptable.

Topic relevance on external stakeholders: This explains why the external impact assessed is material for the external stakeholder(s) evaluated and requires a clear link between the material issue and the relevance to external stakeholders. The description may also refer to the direct or indirect consequences of the impact generated on

societal or environmental stakeholders in terms of size, severity, and/or extent of the damage or benefits caused to societal stakeholders and the environment. The type of impact assessed can be positive, negative, or both. The two impacts reported can be positive or negative but companies are encouraged to assess their external impacts together.

Data Requirements

Please indicate two material issues that illustrate the most significant social or environmental impact on external stakeholder groups (e.g., environment, society, or customers).
Acceptable forms of reporting (inexhaustive) on material issues with externalized impact include:

- Materiality analysis/metrics with the integration of external impact aspects.
- Strategic section of a report or website: Reporting on key strategic areas as part of a sustainability report or website, will only be accepted if there is a clear reference to the external impact dimension, or a detailed explanation of why the issue and associated impact assessed is material to external societal stakeholders or the environment.
- Impact valuation section of a report, website, or a single specific document.

Not acceptable material issues: Please note that companies that do not provide an acceptable material issue for external stakeholders will not receive points on any subsequent aspects of the question.
Unacceptable examples include:

- Purely economic or financial issues: tax payments, net income, amortization & depreciation, interests, dividend payments, salaries, own employment, macroeconomic conditions, etc.
- Operational business issues: market expansion, efficient use of capital, operational excellence, etc.
- Material business issues without providing information on why the issue is relevant to external stakeholders
- Impacts from philanthropic activities, or project-based mandatory environmental and social impact assessments.

Disclosure Requirements

All qualitative information required in this question needs to be supported with attached private or public document(s) or a comprehensive company comment. Options that cannot be verified in supporting documents will be unticked.

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

- Topic relevance on external stakeholders

References

Natural Capital Protocol
https://capitalscoalition.org/capitals-approach/natural-capital-protocol/?fwp_filter_tabs=guide_supplement

https://naturalcapitalcoalition.org/wp-content/uploads/2016/07/Framework_Book_2016-07-01-2.pdf
Social & Human Capital Protocol
https://capitalscoalition.org/capitals-approach/social-human-capital-protocol/
Social Value UK
https://www.socialvalueuk.org/
https://www.socialvalueuk.org/resource/discussion-document-valuation-social-outcomes/
https://social-economy-gateway.ec.europa.eu/topics-focus/measuring-social-impact-new-era-social-economy_en
World Business Council For Sustainable Development (WBCSD):
https://www.wbcsd.org/Programs/People-and-Society/Tackling-Inequality/Resources/WBCSD-Measuring-Impact
https://docs.wbcsd.org/2017/04/IVR_Impact%20Valuation_White_Paper.pdf
Business for Societal Impact B4SI, (formerly London Benchmarking Group LBG):
https://b4si.net/framework/
Social Return on Investment (SROI)
https://www.socialvaluelab.org.uk/wp-content/uploads/2016/09/SROI-a-guide-to-social-return-on-investment.pdf
Impact Reporting & Investment Standards (IRIS)
https://iris.thegiin.org/
Impact Management Project
https://impactmanagementproject.com/

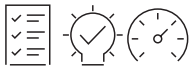
Standards & Frameworks

TNFD - Strategy A.
UNGC - G5, HR/L5, E4

Materiality Metrics for External Stakeholders

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

Assessment Focus



Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

The purpose of this question is to assess the extent to which companies are evaluating the positive and/or negative impacts they are causing on external stakeholders using quantitative metrics linked to the material issues identified in the materiality assessment. To ensure that the company is assessing those impacts, the question asks which quantitative metrics are being used to measure the output of its business activity, the impact that activity has on the external society and/or environment, and also which valuation technique is used to assess the impacts identified.

Companies can use impact valuation techniques to assess and compare the potential impacts that their products, services, or operations have had (or may have) on people and the environment. Investors can use impact valuation techniques to assess and compare the potential impacts that companies they are financing or considering financing may have on people and the planet, as well as their own investor contribution to those impacts.

Question Layout

Has the company evaluated the positive/negative impacts on external stakeholders using quantitative output and impact metrics?

- ○ Yes, the company has evaluated the positive/negative impacts on external stakeholders using quantitative output and impact metrics. Please indicate where this information is available.

Aspect	Impact 1	Impact 2
Supporting evidence		
Public reporting	☐ Yes	☐ Yes
Material issue for external stakeholders Please specify the material issue that generates a positive/negative impact on external stakeholders.		
Output metric Please specify the quantitative metric/s used to measure the output of the direct environmental and/or social results of the business activity.	☐ Quantitative output metric/s linked to material issue	☐ Quantitative output metric/s linked to material issue
Impact valuation Please specify whether the company has conducted an impact valuation converting the output metrics to an impact metric to measure the societal or environmental external impact. Please choose the quantitative metric used in the valuation from the list and provide a description of the impact assessed.	☐ Impact valuation conducted Dropdown menu: Health costs caused/avoided Quantified quality of life impacted Increase/decrease in household-level income Environmental value lost/gained Net impact ratio Social return on investments Social cost caused/avoided Access to product/service with positive impact provided Other Description of the impact assessed	☐ Impact valuation conducted Dropdown menu: Health costs caused/avoided Quantified quality of life impacted Increase/decrease in household-level income Environmental value lost/gained Net impact ratio Social return on investments Social cost caused/avoided Access to product/service with positive impact provided Other Description of the impact assessed
Impact metric Please specify the quantitative metric used to measure company's external impact.	☐ Quantitative impact metric linked to material issue	☐ Quantitative impact metric linked to material issue

Question-Specific Guidance & Definitions

Output metric: This refers to the environmental or social direct results caused by a company's business activities in terms of operations, products/services, and/or supply chain. The metrics must be directly linked to the material issue.

Performance metrics included in the IRIS (Impact Reporting & Investment Standards) catalog are accepted as good practice to define output targets to measure social and environmental success:

Examples of environmental outputs that could be used to set a specific quantitative metric:

- Air pollution reduction (in % or C02 emissions, NOx Emissions, SOx emissions).
- Avoided C02 emission in % or tons, avoided NOx emissions, avoided SOx emissions.
- Water pollution reduction (% of contaminated potable water).
- Ground pollution reduction (in % or tons of waste disposed to landfill, incinerator).
- Waste diverted from landfill (in ton or %).
- Percentage of energy recovered.

Examples of social outputs that could be used to set a specific quantitative metric:

- Number of entrepreneurs that received a microfinance loan.
- Number of fatalities.
- Number of permanent illnesses.
- Sales of products protected by intellectual property rights.

Impact valuation: This refers to the process of valuing and quantifying the external damages and/or benefits (positive/negative externalities) to the society and the environment that are caused as a result of the direct environmental and/or social outputs generated by a company's

business activities. The valuation usually involves quantitative or monetary approaches or a combination of these. Quantitative valuation measures the impact of the negative/positive externalities on societal stakeholders (e.g., society at large, local communities, end users/consumers) and/or the environment (e.g., natural capital) in quantitative, non-monetary terms. Monetary valuations measure the impact of the negative/positive externality caused in monetary terms (e.g., social costs of environmental damages caused).

Examples of environmental impacts

- A change in people's environment:
  - Improved/decreased quality of the air and water and associated health impact,
  - Increased/decreased availability and quality of food,
  - Improved adequacy of sanitation and associated social benefits,
  - Increased physical safety,
- A change in the natural earth system:
  - disruption of the rain cycle,
  - increase in land temperature,
  - acidification of the oceans…
- A change in the quality or availability of natural resources:
  - Destruction of ecosystems, fauna, and flora,
  - Decreased/Increased access to natural resources
  - Damage/Improvement to/of heritage, spiritual or cultural resources
  - Decreased/Improvement of quality or availability of natural resources.

Examples of social impacts

- A change in people's quality of life: How they live and interact with one another.
  - A change in the community: its cohesion, stability, and character.
  - Capacity and Quality of Infrastructure, services, and facilities: associated impact on people's quality of life and/or health.
- A change in health status and wellbeing (physical, mental, social, and spiritual wellbeing):
  - Improved health awareness.
  - Deterioration in health status.
  - Capacity and cost of Local Health Providers.
- A change in personal and property rights, such as violation of their civil liberties.
- Other changes:
  - Increase/decrease in local economic development (note that employment is an output metric).
  - Reduced/increased inequality: distributional impact, e.g., on vulnerable households.
  - Enhanced local work experience, skills, and employability.

To evaluate the external impacts, companies could use different methodologies or standards that can range from standard methodologies from third parties to the company's internal processes. Even this question is not requesting to report the methodology that has been used, a list of the most well-known methodologies and standards that companies use for external impact measurement, management, and disclosure can be found here as a reference:

- Social & Human Capital Protocol.
- Business for Social Impact (B4SI).
- Socio-Economic Assessment Toolbox (SEAT).
- Social Return on Investment.
- Impact Reporting & Investment Standards (IRIS).
- Other third party-methodology.
- Company internal methodology.

Impact metric: This is the quantitative (monetary or non-monetary) metric used to measure the impact caused on external societal stakeholders or the environment. It converts the output metric into a quantitative impact metric by evaluating the impact of the external damage or benefits (negative/positive externalities) for societal stakeholders or the environment. Note that the output and impact metrics are directly linked with each other, and with the material issue assessed, but the metric/unit used cannot be the same.

Example of quantitative metrics:

- Quality of life improvement: % increase in self-confidence
- Quality life years gained from a new medical treatment vs. the standard of care
- % reduction in chronic illnesses due to the company's program
- % Loss of productive and habitable land
- % Loss of production in fisheries due to the spill of pollutants in rivers
- % Health-Adjusted Life Years (HALYs)

Example of monetary metrics:

- Social cost of carbon
- Social cost of water
- Social cost of waste
- Social cost of alcohol
- Cost of quality life year gained from a new medical treatment vs. standard of care
- Cost of work-related stress to society

Data Requirements

Output metric:

- Companies clearly specify at least one quantitative environmental or social output metric directly linked to the material issue identified, associated external stakeholder group impacted and the company's business activity in line with the question "Material Issues for External Stakeholder".
- Supporting evidence is required linking the output metric to the material issue for external stakeholders. As an example: if the company is tracking its waste diverted from landfill (as a percentage or in metric tons), this is not sufficient unless a link to its external impact on the environment or societal stakeholders is clearly established in the supporting evidence (i.e., private or public documents or comprehensive comment).
- If one or both Material Issues in the question "Material Issues for External Stakeholders" are not acceptable, the output metric associated with the material issue identified by the company is also not acceptable due to the missing link between the material issue and its external impact

aspects.

- For acceptable output metrics, the checkbox should be marked, and the specific value and unit of the output metrics provided in the text box. Companies may choose to provide additional supporting evidence in the form of an explanation.
- In case the specific impact is caused by more than one output, companies should specify all the relevant metrics.
- Metrics already reported in other CSA questions (e.g., emissions, waste, biodiversity, community impact), will only be accepted as long as there is a clear reference to the external impact dimension in previous question (e.g., importance of the topic to society, preservation of natural capital, contribution to SDGs, impact on climate change, etc.) and an impact metric linked.

Impact valuation:

- Supporting evidence to validate that an impact valuation has been conducted is required in the form of private or public document(s) or a comprehensive company comment.
- The supporting evidence is expected to provide an explanation of how the output generated by the company due to its business activities translates into externalized societal or environmental impact.

Impact metric:

- In case the company has quantified (in monetary or non-monetary terms) the external impact generated on societal stakeholders or the environment, this option can be ticked. In the comment box, the quantitative impact value and unit of measurement are expected to be provided.
- The impact metric is required to be directly linked to the output metric and the impact valuation conducted.

Not acceptable Impact metrics:

- Pure economic and financial metrics: GDP growth, Tax payments, Net income, Amortization & depreciation, Interest, Salaries, Own employment, Taxes (direct income tax, indirect taxes & duties), Economic Value Add or Gross Value Add.
- Impacts due to philanthropic activities.
- Metrics regarding the company's own employees (including occupational health and safety metrics, employee training, employee benefits, and salaries, etc.).
- Metrics on resource usage reductions or avoided emissions, as these are output metrics.
- Social and Environmental Impact Assessments are conducted for specific projects only.
- Metrics that are not linked to the output metric and the material issue.

Disclosure Requirements

All qualitative information required in this question needs to be supported by attached private or public document(s) or a comprehensive company comment. Options that cannot be verified in supporting documents will be unticked.

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

- Quantitative impact metric linked to the material issue for external stakeholders.

References

Natural Capital Protocol
https://capitalscoalition.org/capitals-approach/natural-capital-protocol/?fwp_filter_tabs=guide_supplement
https://naturalcapitalcoalition.org/wp-content/uploads/2016/07/Framework_Book_2016-07-01-2.pdf
Social & Human Capital Protocol
https://capitalscoalition.org/capitals-approach/social-human-capital-protocol/
Social Value UK
https://www.socialvalueuk.org/

https://social-economy-gateway.ec.europa.eu/topics-focus/measuring-social-impact-new-era-social-economy_en
https://www.socialvalueuk.org/app/uploads/2017/11/Discussion_Paper_on_SVP_NCP-FINAL-VERSION-2-1.pdf
World Business Council For Sustainable Development (WBCSD):
https://www.wbcsd.org/Programs/People-and-Society/Tackling-Inequality/Resources/WBCSD-Measuring-Impact
https://docs.wbcsd.org/2017/04/IVR_Impact%20Valuation_White_Paper.pdf
Business for Societal Impact B4SI, (formerly London Benchmarking Group LBG):
https://b4si.net/framework/
Social Return on Investment (SROI)
https://www.socialvaluelab.org.uk/wp-content/uploads/2016/09/SROI-a-guide-to-social-return-on-investment.pdf
Impact Reporting & Investment Standards (IRIS)
https://iris.thegiin.org/
Impact Management Project
https://impactmanagementproject.com/

Standards & Frameworks

TNFD - Strategy A.

Risk & Crisis Management

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

Risk Governance

Flexible: Public information requirements depend on if the company is listed or non-listed.

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

This question assesses the effectiveness of a company's risk governance framework. For this, it is important the company's senior management and board of directors are not just aware of risks but also actively involved in managing them. While the board of directors is ultimately responsible for risk management, it is up to senior management to take the board's strategic direction and turn it into appropriate policies and procedures, and to effectively implement, execute, and monitor these policies.

The three lines of defense model is a recognized governance framework for managing risks. It lays out clear risk management responsibilities and accountabilities to ensure a company´s risk-related objectives are achieved. In this model, the first and second lines are responsible for executing and monitoring risk management activities. The third line operates independently to check how well the risk management processes are working.

Question Layout

Does the company have governance mechanisms in place to oversee risks?
Listed companies are required to provide links to public reports or corporate websites.
Non-listed companies are required to provide internal documents and/or links to public reports or corporate websites.

- ○ Yes, the company has governance mechanisms in place to oversee risks.

  The company has a risk governance framework with board level risk oversight**:**

  - ☐ Dedicated role or committee at board level for risk oversight (independent and/or non-executive board member(s))

  The company has a risk governance framework with dedicated operational risk management functions in place:

  - ☐ Operational Risk Ownership (first line): Front-line employees or dedicated operational roles (e.g., risk managers, business unit heads) own and manage risks.
  - ☐ Risk Management and Compliance Oversight (second line): A dedicated role(s) or committee(s) exist(s) at the senior management or executive level, which is responsible for setting control standards and oversees compliance with them (does not include the CEO).
  - ☐ Independent Audit Unit (third line): An internal audit function that provides independent assurance on the effectiveness of risk management and compliance processes.

Question-Specific Guidance & Definitions

Board level responsibility: A dedicated role or committee at the level of the highest governing body consisting of only members that are either independent and/or non-executive board members, i.e. committees with executive members or other management level members are not acceptable. This could be a risk committee or an audit committee tasked with explicit responsibility for risk management overview. For two-tier boards, the board-level committee must be formed of members of the supervisory board.

Operational Management Functions (Three Lines of Defense Model)

Operational risk Ownership (first line): The employees or teams directly involved in producing and/or delivering products and services to clients. They are responsible for owning and managing risks in day-to-day operations. The first line is responsible for the execution of controls set by the second line. We expect clear assignment of risk management responsibilities at the business unit level, which could include roles such as risk owners, risk managers and business unit heads.

Risk management and compliance oversight (second line): The individual(s), committee(s) or body(ies) in the organization charged with monitoring and supporting risk management processes, ensuring risk management objectives are achieved. This oversight typically falls to senior management or the executive level, which are responsible for setting control standards and overseeing compliance. The second line responsibility may be split into several sub functions - related to risk type for example - from a main/group function in charge of monitoring risk. However, we expect that specific sub functions would report into an overarching role or main function as defined by the company. For two-tier boards, risk management responsibility as the second line of defense can be at the management board level. Examples of responsible people or committees include the chief risk officer, risk management committee and chief compliance officer. Given that the CEO has ultimate responsibility for all aspects of a company's operations, the CEO is not accepted here; rather, the expected function would report to senior management or the CEO.

Independent audit unit (third line): The unit tasked with advising and auditing to ensure policies are followed and processes are executed in line with management's selected performance goals and risk tolerances. This could be an internal audit team or a comparable external function, providing independent assurance that organizational practices are aligned with the company's risk strategy and policies, as implemented by the first and second lines. The independence of this unit ensures objective monitoring and control of various risks, safeguarding the organization's interests without conflicts of interest arising from other business priorities. This function typically reports directly to the board of directors on top of senior/executive management and remains separate from the implementation of processes or risk management to preserve its objectivity.

Note: The responsibilities of internal audit as part of the third line of defense extend beyond financial reporting compliance audits.

Data Requirements

To answer this question, it's important to focus on the organization's general risk management governance framework, rather than responsibilities defined in specific sections of the report such as Occupational Health & Safety, Human Rights or Climate Change.

Disclosure Requirements

The document(s) you have attached will be used to verify your response. Any response that cannot be verified in the attached document(s) will not be accepted.

Listed and/or publicly owned companies are required to provide links to public reports or corporate websites.
Non-listed companies are required to provide the following evidence, depending on the type of company:

- **Family-owned companies and privately owned companies** are required to provide public reports, corporate websites, or internal documents.
- **Cooperatives** are required to provide public reports, corporate websites, or internal documents.
- **State-owned companies** are required to report on their corporate governance in the public domain as their key stakeholder is the general public.

Please note: Answers in the form of "Confidential additional comments" for any type of non-listed company will not be accepted.

References

COSO Framework
The Institute of Internal Auditors

Standards & Frameworks

CSRD - GOV-1 Governance Bodies Role, GOV-2 Board Sustainability Oversight

Risk Management Processes

Flexible: Public information requirements depend on if the company is listed or non-listed.

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

This question assesses a company's risk management practices and strategies, essential for fostering an effective risk culture. Effective risk and crisis management are vital for long-term financial stability and adaptability. Implementing internal control processes ensures compliance with current regulations and positions a company to proactively refine these controls.

Conducting robust risk assessments including evaluating risk exposure and determining risk appetite allow companies to respond strategically to events that may have a material impact. Moreover, regular and frequent risk reviews and audits can enhance the effectiveness of risk management processes. To embed these practices into the wider organization, measures should be taken to educate and incentivize employees at all levels of the business, thereby nurturing a strong and effective risk culture. Such an approach ensures risk management is not just a compliance exercise but a fundamental part of the company's operational mindset.

Question Layout

Does the company have risk management processes to promote effective risk culture?
Listed companies are required to provide links to public reports or corporate websites.
Non-listed companies are required to provide internal documents and/or links to public reports or corporate websites.

- Yes, the company has risk management processes to promote effective risk culture.

  The risk review process include the following elements:

  - ☐ Description of the company-specific risk exposure (considering likelihood and magnitude) of at least two identified risks
  - ☐ Description of process or framework to determine the risk appetite for identified risks
  - ☐ Description of mitigating actions for at least two identified risks.

  The company reviews its risk exposure on a regular basis:

  - At least twice a year or more frequently
  - At least yearly
  - Less frequently than yearly
  - Not specified.

  The company has conducted an audit of the risk management process. Please specify if an internal audit and/or an external audit has been performed:

  - ☐ Yes, the company has conducted an internal audit in the last two years
  - ☐ Yes, the company has conducted an external audit in the last two years

  The company has strategies in place to promote an effective risk culture throughout the organisation:

  - ☐ Regular risk management education for all non-executive directors
  - ☐ Focused training throughout the organization on risk management principles
  - ☐ Incorporation of risk criteria in the development of products and services
  - ☐ Financial incentives which incorporate risk management metrics

Question-Specific Guidance & Definitions

Risk review: A risk review is a process that involves identifying risks and assessing or reassessing their impact and likelihood. This process includes updating the status of various risks and implementing procedures to identify hazards and determine potential negative effects. This may include stress testing and sensitivity scenario analyses. We expect risk exposure to be reported for at least two of the identified risks.

The elements that define a risk review and are considered best practice include:

1. Description of company-specific risk exposure: This should at least evaluate the potential magnitude and likelihood of materialization of the risk, considering the factors unique to the business or industry to define the impact of the risk on the company, e.g., stress testing, scenario analysis and sensitivity analysis are measures to assess the magnitude of impact when risks materialize but do not necessarily give an indication of likelihood of materialization.

2. Process or framework to determine risk appetite: There should be a clearly defined process or framework outlining the company's risk appetite (the level of risk it is willing to accept) for the identified risks including who within the organization is responsible for this.

3. Description of mitigating actions: Actions taken to reduce the severity of the risk and the likelihood of potential negative impacts should be described.

Review of risk exposure: Regular reviews are essential to keep up with changes in the risk landscape that could affect the company's risk exposure. These reviews help the organization to stay resilient against potential risks. They ensure the designated risk appetite and mitigating actions stay up-to-date and relevant. The mere reporting of risk exposure indicators, e.g., in the annual report is not considered sufficient evidence of an active risk exposure review process.

Audit of risk management processes in the last two years: This involves a systematic assessment of the methods, tools and processes used in identifying, evaluating, controlling, monitoring and reporting risks. Per best practice, audits can be conducted by qualified, internal auditors and by qualified, independent third-party auditors. These audits should follow guidelines on management systems audits or risk management standards such as ISO 31000 and should be conducted at least every two years.

Promotion of an effective risk culture: Creating a strong risk culture is important for integrating risk processes, procedures and employee awareness throughout the organization. This can be achieved by:

- **Regular risk management education for non-executive directors:** Education of board members should be recurring and specific to risk management. This is different from regular risk reporting to the board.
- **Providing training to all employees:** Training must cover risk management and be provided at a group level.
- **Considering risk factors when developing new products or**
- **services:** Risk criteria can be linked to financial risks, regulatory risks, operational risks, etc.
- **Offering financial incentives tied to meeting risk-related goals:** Incentives should be related to specific risks the company has identified as key concerns. For instance, if health and safety is

noted as primary risk, the incentives should be directly linked to this risk, and address and incentivize the reduction of risks associated with health and safety.

Data Requirements

To answer this question, it is important to focus on the organization's general approach to risk identification and risk review, rather than specific areas such as occupational health & safety, human rights or, climate change. Reports such as those from the Task Force on Climate-related Financial Disclosures (TCFD) or the Carbon Disclosure Project (CDP) are not considered suitable evidence in this context. However, if climate change is identified as a significant material risk, we would expect it to be reported in the overarching risk section.

Risk Review

- Please provide information that the evaluation considers multiple factors like likelihood, magnitude, business relevance, geographical location, etc., to distinguish between a mere description of the risk and an assessment of its exposure.
- Company risk exposure description without any information nearby which explains how the company evaluates the impact is not accepted.

Audit

- Please provide information about the audits conducted on your risk management processes in the last two years
- The frequency should be clearly reported

Not acceptable for 'The company has conducted an audit of the risk management process':

- A policy or commitment to conduct audits every two years
- Audits related to internal controls of financial reporting
- Audit of the financial statements

Risk Culture

Not acceptable for 'board of directors training on how to manage risks':

- Directors' induction or orientation programs that cover risk management, as these are typically one-off events rather than ongoing education.
- Training that is solely about specific topics, such as new regulations or policies.
- Trainings only provided to selected directors implying not all non-executive directors receive these trainings.
- If non-executive directors are "encouraged" or "guided" or "recommended" to take training. Instead, please provide information that a specific evidence that education is provided or mandated.
- The board receiving briefings or reports from committees.
- If the board is updated on internal risk management matters as this is a mere reporting on risk management performance to the board of directors and is not equivalent to a formal training or education.

Not acceptable for 'focused training throughout the organization on risk management principles':

- Information for trainings which are focused on specific topics such as new regulations, policies, health and safety, or cybersecurity are not accepted as these are considered trainings on specific risks, not overall risk management.

Disclosure Requirements

The document(s) you have attached will be used to verify your response. Any response that cannot be verified in the attached document(s) will not be accepted.

Listed and/or publicly owned companies are required to provide links to public reports or corporate websites.
Non-listed companies are required to provide the following evidence, depending on the type of company:

- **Family-owned companies and privately owned companies** are required to provide public reports, corporate websites, or internal documents.
- **Cooperatives** are required to provide public reports, corporate websites, or internal documents.
- **State-owned companies** are required to report on their corporate governance in the public domain as their key stakeholder is the general public.

Please note: Answers in the form of "Confidential additional comments" for any type of non-listed company will not be accepted.

References

COSO Framework
ISO 31000:2018 Risk Management

Standards & Frameworks

TNFD - Risk Management A(i)

Emerging Risks

Flexible: Public information requirements depend on if the company is listed or non-listed.

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

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

Question Layout

Does the company report on long-term, emerging risks?

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

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

○ Yes, the company reports on long-term emerging risks.

Aspects		Emerging risk 1		Emerging risk 2
Supporting evidence				
Name of the emerging risk				
Category		Dropdown: Economic Environmental Geopolitical Societal Technological Other		Dropdown: Economic Environmental Geopolitical Societal Technological Other
Description	☐	The company reports on the description and specification of emerging risk 1 in the context of its business. Please provide the description in the text box below.	☐	The company reports on the description and specification of emerging risk 2 in the context of its business. Please provide the description in the text box below.
Impact	☐	The company reports on the potential impact of emerging risk 1 on its business. Please provide the impact description in the text box below.	☐	The company reports on the potential impact of emerging risk 2 on its business. Please provide the impact description in the text box below.
Mitigating actions	☐	The company reports on the mitigating actions of emerging risk 1. Please provide the description of the mitigating actions in the text box below.	☐	The company reports on the mitigating actions of emerging risk 2. Please provide the description of the mitigating actions in the text box below.

Question-Specific Guidance & Definitions

Emerging risks: The focus should lie on the most significant emerging risks that are expected to have a long-term impact on the company and that are explained in public disclosures. Risks that are considered to be acceptable here include any newly identified risks that are expected to have a long-term impact on the company's business, although in some cases they may have already begun impacting the company's business today. A risk, by definition, has not materialized. However, an emerging risk in addition to not having materialized, is unprecedented and has not been handled in the past. Therefore, there is a lack of knowledge/preparation when it comes to managing the potential risk.

Impact on the business: It is not expected that a precise financial impact of these risks on the business can already be calculated or estimated, but rather a convincing description of how these emerging risks could impact the business, and require the company to adapt its strategy and/or business model.

Risk categories: The risk categories available in the dropdown menu are aligned with the categories defined in the World Economic Forum – Global Risk Report. The categories are Economic, Environmental, Geopolitical, Societal, and Technological. While we acknowledge that the five categories above might not be exhaustive, the category "Other", should only be used for other external risk categories that are industry-specific. Categories such as operational risk, compliance risk, reputational risk, competition risk, or market risk are not acceptable.

Data Requirements

Because the disclosure of long-term emerging risks (beyond operational risks commonly reported by companies or required by regulators) is so important for long-term investors, the risks provided in this question should correspond to risks that are disclosed publicly (e.g., annual report, sustainability report, integrated report, company publications, corporate website, risk reports). Additional specifications related to the description of the risk, the business impact, and mitigating actions not available in the public domain will not be considered.

a) Emerging risks reported in this question have to be part of the broad, cross-functional and general risk assessment exercise of a company, therefore we would not accept risks identified as part of a specific risk assessment exercise (Human Rights risk assessment, OHS risk assessment, climate risk assessment, etc.).

b) The same risk cannot be reported for more than 3 years in a row. Similarly, if the company has been reporting the same risk in its public

disclosure for more than 3 years, it is not considered emerging anymore.

c) An emerging risk needs to fulfill the six below requirements in order to be accepted:

- The risk is **new, emerging**.
- The potential impact of the risk may be unknown and is long-term, i.e., the risk is unlikely to have a significant immediate impact on the company, but potentially may have begun to have consequences for the company today.
- The potential impact of the risk is **significant**, i.e., it has the potential to affect a large part of the company's operations and may require the company to adapt its strategy and/or business model.
- The risk is an **external** risk, i.e., it arises from events outside the company that are beyond its influence or control. Sources of these risks include natural, geopolitical, or macroeconomic factors, but exclude operational, reputational, or market risks.
- The risk and its impact on the company are **specific**. For example, long-term risks like macroeconomic developments should be described in the context of the business environment that the company operates in (i.e., the specific regulations or laws that may be introduced) and the impact on the company should be specific (i.e., not simply the description of the overall impact on the industry).
- The risk and its impact are **publicly disclosed with the exception established for Non-listed companies.**

As a result, climate change, for example, would not be an acceptable emerging risk since it is an issue that has been significantly impacting the business environment for a number of years and that companies would have prepared for.
The mitigating actions have to be reported together with the risk and its impact, as a response to the risk.

Not acceptable risks

- litigation risk
- regulatory risk (except if it is linked to a specific future regulation that is uncertain and can have as an impact that the company needs to change its strategy. This new regulation needs to be linked to an external risk).
- commodity risk or price risk
- competition/market risk (Risks mentioning the impact on the competitive landscape based on technological or societal developments are acceptable)
- Operational risk such as IT failures, data breaches, cyber security breaches. If cybersecurity and data privacy is mentioned in relation to a new technological development, such as Internet of Things (IoT), Artificial Intelligence (AI), Bio-engineering, those can be accepted.
- Potential mergers and acquisitions within its market
- currency risk.

Disclosure Requirements

Listed and/or publicly owned companies are required to provide links to public reports or corporate websites.
Non-listed companies are required to provide the following evidence, depending on the type of company:

- **Family-owned companies and Privately owned companies** are required to provide public reports, corporate websites, or internal documents.
- **Cooperatives** are required to provide public reports, corporate websites, or internal documents.
- **State-owned companies** are required to report on their risk management in the public domain as their key stakeholder is the general public.

Please note: Answers in the form of 'Confidential additional comments' for any type of non-listed company will not be accepted.

References

World Economic Forum – The Global Risks Report

Standards & Frameworks

CSRD - SBM-3 Material Impacts Risks & Opportunities, SBM-3 Material Risks & Opportunities, SBM-3 Own Workforce
TNFD - Risk Management A (i), Strategy C

Business Ethics

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

UN Global Compact Membership

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

AIR, ALU, ARO, ATX, AUT, BLD, BNK, BTC, BVG, CHM, CMT, CNO, COL, COM, CON, COS, CSV, CTR, DHP, DRG, ELC, ELQ, FBN, FDR, FOA, FRP, GAS, HEA, HOM, HOU, ICS, IDD, IEQ, IMS, INS, ITC, LEG, LIF, MNX, MTC, MUW, OGR, OGX, **OIE**, PIP, PRO, PUB, REI, REM, REX, RTS, SEM, SOF, STL, TCD, TEX, THQ, TLS, TRA, TRT, TSV

Question Rationale

The UN Global Compact (UNGC) is a reference point for investors to apprehend which companies are truly committed to sustainable growth. Indeed, being a participant/signatory of the UNGC requires a public commitment of the company's CEO and the yearly release of a Communication on Progress. This question aims to verify whether companies have taken this important public stance, regardless of their size.

Question Layout

Is the company a participant of the UN Global Compact?

- Yes, the company is a participant of the UN Global Compact. Please indicate where this information is available in **public reporting or corporate website**.
- No, the company is not a signatory, but its parent company is a participant. Please indicate where this information is available in **public reporting or corporate website**.

Data Requirements

In order to accept answers, we need to verify your company's participation in the UNGC in the public domain. Please, attach a public letter of commitment or last year's Communication on Progress.

Please note that we will also accept a link to the list of active members on the UNGC website where we can verify the name of your company.

Taiwanese companies not already members of the UNGC should select "The question is not applicable to the company" and provide explanations in the comment box.

References

UNGC Signatory List

Standards & Frameworks

CDP - 4. 10

UNGC – G12

Codes of Conduct

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

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 how 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

Does the company have a group-wide code of conduct and is it available publicly?

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

Data Requirements

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

Codes of conduct that are applicable to a wide range of executives - directors, managers, and supervisors is accepted.

Not acceptable:

- Code of conduct which is applicable only to directors and senior management.
- Code of conduct which permits waivers of the code for directors or executive officers.

Corruption and bribery

The policy should cover both ways (i.e., the company does not just prohibit bribing external parties, but also prohibit corruptive behavior within the company itself, e.g., accepting gifts etc.) for the option to be accepted.

Antitrust/anticompetitive practices

General information on fair dealing or ethical practices is not accepted for this option. Fair dealing refers to the ethical and lawful conduct in business transactions, encompassing principles of honesty, integrity, and respect for the rights of others. It involves acting in a transparent, equitable, and morally upright manner when engaging in commercial activities, including negotiations, contracts, and transactions. Fair dealing promotes trust, reliability, and mutual respect among parties involved in business interactions.

Environment, health, and safety

Please provide information that the policy covers all three aspects, environmental and health & safety, to accept the option.

Disclosure Requirements

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

Any response that cannot be verified in the attached public document(s) will not be accepted.

Standards & Frameworks

UNGC - G2, G6, AC2
SFDR - M - UNGC and OECD Compliance Mechanisms

Anti-Bribery & Anti-Corruption Policy

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

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-Bribery & Anti-Corruption 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-Bribery & Anti-Corruption 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 or sponsorship can be used as a subterfuge for bribery, they should be explicitly covered by the anti-corruption policy and should be publicly disclosed.

Question Rationale

Question Layout

Does the company have a group-wide policy on anti-bribery and anti-corruption and is it available publicly?

- Yes the company has a group-wide policy on anti-bribery and anti-corruption. Please indicate where this information is available in **public reporting or corporate website.**

  Policy aspects

  The policy covers the following aspects:

  - ☐ Prevention of bribery and corruption
  - ☐ Guidelines for gifts
  - ☐ Guidelines for political contributions
  - ☐ Guidelines for charitable contributions or sponsorship
  - ☐ Training for anti-bribery and anti-corruption
  - ☐ Established procedures for handling breaches
  - ☐ Corrective or disciplinary actions when there is a breach of the policy

  Policy endorsement

  - ☐ Please select the highest endorsing decision-making body:
    - Board of directors
    - Executive management

Question-Specific Guidance & Definitions

Gifts: The term "gifts" includes tendering to a recipient products, services, cash, or cash equivalents (e.g., checks, travelers' checks, gift cards, gift certificates, vouchers, loans and shares) and all business courtesies, gratuities, discounts, favors and other things of value for which the recipient does not pay the fair market value.

Political contributions: This option refers to political contributions that act as means of bribery and corruptions and this needs to be explicitly addressed in the attached policies.

Other aspects related to political contributions that are not linked to bribery and corruption are addressed in other parts of the CSA questionnaire.

Charitable donations or sponsorship: This option specifically considers donations, and sponsorship that act as a means of bribery and corruption, and this needs to be explicitly addressed in the attached policies. In the context of this question, disclosure of details of donations and sponsorship is only considered for topics that are specifically covered in relevant policies, such as the company Codes of Conduct or a separate Anti-Bribery & Anti-Corruption policy.

Other aspects related to charitable donations or sponsorship that are not linked to bribery or corruption are addressed in other parts of the CSA questionnaire.

Training for anti-bribery and anti-corruption: Training that is provided to all employees on anti-bribery and anti-corruption. It should be provided to all employees, not just certain designations or roles.

Established procedures for handling breaches: This option refers to where the policy covers a procedure to handle a breach or incident of bribery and corruption. It should be related to auditing, reviewing or investigation of allegations. Please note that whistleblowing is covered in a separate question. This is specifically about bribery and corruption.

Corrective or disciplinary actions when there is a breach of the policy: This option refers to a commitment by the company to taking corrective or disciplinary actions in cases of violations of the anti-bribery and anti-corruption policy.

Disclosure Requirements

This question requires supporting evidence from the public domain. The information provided must be included in your public reporting (e.g., anti-bribery and anti-corruption policy, Code of Conduct, annual report, sustainability report, integrated report, corporate citizenship/corporate social responsibility report) or corporate website.

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

References

- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- United Nations Convention Against Corruption, 2003
- Business Principles for Countering Bribery, 2013 (by Transparency International)
- Principles and guidance for anti-corruption corporate transparency, 2020 (by Transparency International)
- ICC Rules on Combating Corruption, 2023 edition

Standards & Frameworks

SFDR - A - Anti-Corruption and Anti-Bribery Policies, M - UNGC and OECD Compliance Mechanisms
UNGC - G2, G3, G3.1, AC2, AC4

Whistleblowing Mechanism

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

Whistleblowing mechanisms serve as deterrent for unethical behavior and provide a platform for individuals to report any suspected wrongdoings, ensuring transparency and accountability and promoting a culture of integrity within an organization.

Question Layout

Does the company have a whistleblowing mechanism?

- Yes, the company has a whistleblowing mechanism. Please indicate where this information is available in **public reporting or corporate website.**
  - ☐ Dedicated department(s) and/or person(s) responsible for the whistleblowing mechanism is defined
  - ☐ Reporting channel is operated by an independent third-party
  - ☐ Whistleblowers are allowed to submit reports anonymously
  - ☐ Details of reports received are kept confidential
  - ☐ Zero tolerance policy for retaliation
  - ☐ Provision of training on the use of reporting channel
  - ☐ Disclosure on the process for investigating the reported breaches

Question-Specific Guidance & Definitions

Whistleblowing: Is the act of reporting any suspected wrongdoing.

Whistleblowers: Persons, either an employee or non-employee, who report suspected wrongdoing.

Dedicated department(s) and/or person(s) responsible for the whistleblowing mechanism is defined: Individuals and/or teams directly involved in the management of the company's whistleblowing mechanism and responsible for receiving the reports up until concluding the investigation on the reported breach.

Reporting channel is operated by an independent third-party: Whistleblower channels operated by an independent third-party act as impartial intermediaries between the company and the whistleblower, and manages the reports received for them.

Whistleblowers are allowed to submit reports anonymously: Anonymous reporting allows individuals to report misconduct or compliance concerns without disclosing their identity to the person or team receiving the report.

Details of reports received are kept confidential: Confidential reporting prevents the identify (e.g., name, contact information…) of the whistleblower and the details of the report from being shared to anyone aside from the relevant parties involved (e.g., ethics department, human resource department, whistleblower…etc.)

Zero tolerance policy for retaliation: Reassures whistleblowers that they are protected against retaliation or any unfavorable treatment against them upon reporting any misconduct or compliance concern.

Provision of training on the use of reporting channel: Training focused on providing the company's personnel information on the process of reporting ethical misconducts promotes transparency and accountability within an organization.

Disclosure on the process for investigating the reported breaches: Process which describes what happens when a report is received up until it is resolved.

Data Requirements

1. Dedicated department(s) and/or person(s) responsible for the whistleblowing mechanism is defined:

Our expectations:

- Public disclosure on who is responsible for the company's whistleblowing mechanism.
- Information on who to approach in case an individual wants to report a breach.

Not acceptable:

- Information on hotlines, email address or physical addresses

that individuals can use to report breaches.

2. Reporting channel is operated by an independent third-party:

Our expectations:

- Information on whether the reporting channel is operated by an independent third-party.

Not acceptable:

- If the reporting channel is operated by employees or an internal team.
- Only stating that the channel is operated by an independent team but is employed by the company.

3. Whistleblowers are allowed to submit reports anonymously:

Our expectations:

- Whether individuals are allowed to report breaches without indicating their name or contact information in the report.

Not acceptable:

- Reports need to be filed with the whistleblowers' contact information.

4. Details of reports received are kept confidential:

Our expectations:

- Disclosure that the details of the report received will not be shared with anyone. (e.g., the potential misconduct, identity of the whistleblower…etc.)

5. Zero tolerance policy for retaliation

Our expectations:

- A commitment or statement to prohibit retaliation or unfavorable treatment against whistleblowers.
- Disciplinary action taken in case of retaliation on persons who report a misconduct.

6. Provision of training on the use of reporting channel

Our expectations:

- Information on whether personnel are provided with training on how to use the company's reporting channel or whistleblowing policy.

Not acceptable:

- Information on the total trainings provided.
- Overall Code of Conduct training without specifying that it includes training on the whistleblowing policy or channel.

7. Disclosure on the process for investigating the reported breaches:

Our expectations:

- Information on the procedures in place to investigate reports received.
- Step-by-step information from what happens when a report is received until it is concluded.

Not acceptable:

- Information on investigation of actual breaches
- Total number of breaches.

Disclosure Requirements

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

Any response that cannot be verified in the attached public document(s) will not be accepted.

References

- ICC Guidelines of Whistleblowing
- Transparency International
- ISO 37002

Standards & Frameworks

SFDR-A - Whistleblower Protection

UNGC- G6, G6.1

Reporting on Breaches

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

Organizations are increasingly expected by the marketplace, international norms and stakeholders to demonstrate their adherence to integrity, governance and good business practices. While reporting to authorities is mandatory in many countries, our questions look for evidence of transparent corporate reporting to **all** stakeholders. This question assesses the transparency a company shows toward its stakeholders in relation to breaches of its codes of conduct or anti-corruption and bribery policies, in terms of both the occurrence of incidents and the company's response.

Question Layout

Does the company publicly report on breaches of the code of conduct for the last financial year?

- Yes, the company publicly reports on the breaches of the code of conduct for the last financial year. Please indicate where this information is available in **public reporting or corporate website**.
  - The company reports on following areas:

Reporting areas	FY 2025
Corruption or bribery	
Discrimination or harassment	
Customer privacy data	
Conflicts of interest	
Money laundering or insider trading	

  - The company report breaches on a combined basis for all areas in the code of conduct
  - The company report breaches on a combined basis, but only for some areas in the code of conduct
  - The company reports that no code of conduct related breaches have occurred during the most recent reporting cycle

Metric	FY 2025
☐ The company reports the amount of fines related to corruption and bribery cases Currency:	
☐ The company reports the amount of convictions related to corruption and bribery	

Question-Specific Guidance & Definitions

Customer data privacy: A data breach relative to the customer. This is defined as the accidental or unlawful destruction, loss, alteration or unauthorized disclosure of or access to personal data transmitted, stored or otherwise processed. This includes, but is not limited to, the disclosure of personally identifiable customer information, theft of customer financial information and healthcare data.

Data Requirements

This question assesses disclosure on various aspects of code of conduct-related breaches, such as corruption, discrimination, privacy,

insider trading, etc. Filings to authorities that are not publicly available to all stakeholders will not be considered here.

If the company discloses the total monetary value of fines associated with corruption and bribery cases, the tick box “We report the amount of fines related to corruption and bribery cases (latest FY)” should be marked and the numerical text box filled.

If the company discloses just the total number of breaches for all aspects of the code of conduct (without breakdown), then the second option — “We report on total number of cases/breaches but do not report on specific areas” — should be selected.

If, while reporting, the company has grouped some areas of breaches together, then the third option — “We report breaches on a combined basis, but only for some areas in the code of conduct” — should be selected.

If there were no codes of conduct breaches, the fourth option — “We report that no codes of conduct-related breaches have occurred during the most recent reporting cycle" — should be chosen. Please also indicate where this is publicly reported.

The absence of breaches needs to be publicly disclosed for the purpose of this question and an indication of where this is publicly reported should be given. A comment indicating that no breaches occurred and that reporting would have been available in the event of such breaches occurring is not sufficient for this question.

Disclosure Requirements

- This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications or corporate website).
- Any response that cannot be verified in the attached public document(s) will not be accepted.

References

Convention on Combating Bribery of OECD Legal Instruments Foreign Public Officials in International Business Transactions
United Nations Convention Against Corruption, 2003
Business Principles for Countering Bribery, 2013 (by Transparency International, second edition)

Standards & Frameworks

SFDR - A - Incidents of Discrimination, A - Corruption and Bribery Convictions
UNGC - AC5

Policy Influence

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

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

Contributions & Other Spending

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

Assessment Focus

Change from Last Year

Changed from 2025

Applicable Industries

All

Question Rationale

Although companies legitimately represent themselves in legislative, political, and public discourse, excessive contributions to political campaigns, lobbying expenditures, and contributions to trade associations and other tax-exempt groups may damage companies' reputations and create corruption risks. This question will assess how much money companies are allocating to organizations whose primary role is to create or influence public policy and the extent to which these amounts are disclosed to the public.

Question Layout

Does the company track its annual total monetary contributions to and spending for political campaigns, political organizations, lobbyists or lobbying organizations, trade associations, and other tax-exempt groups?

○ Yes, the company tracks its annual total monetary contributions to and spending for political campaigns, political organizations, lobbyists or lobbying organizations, trade associations, and other tax-exempt groups. Please indicate where this information is available.

Contributions	FY 2022	FY 2023	FY 2024	FY 2025	Public reporting
Lobbying, interest representation or similar					☐ Yes
Local, regional or national political campaigns / organizations / candidates					☐ Yes
Trade associations or tax-exempt groups (e.g. think tanks)					☐ Yes
Other (e.g. spending related to ballot measures or referendums)					☐ Yes
Total contributions and other spending					
Coverage (as a percentage of denominator, indicating the organizational scope of the reported data) percentage of:					

○ Yes, but the company could only track the total spending figures. Please indicate where this information is available.

Contributions	Inclusion/exclusion	Public reporting
Lobbying, interest representation or similar	Drop-down menu: • Included • Not included • No contribution • Not known	☐ Yes
Local, regional or national political campaigns / candidates	Drop-down menu: • Included • Not included • No contribution • Not known	☐ Yes
Trade associations or tax-exempt groups (e.g. think tanks)	Drop-down menu: • Included • Not included • No contribution • Not known	☐ Yes
Other (e.g. spending related to ballot measures or referendums)	Drop-down menu: • Included • Not included • No contribution • Not known	☐ Yes

Contributions	Currency	FY 2022	FY 2023	FY 2024	FY 2025
Total contributions and other spending					
Coverage (as a percentage of denominator)	percentage of:				

○ No, the company did not make any contributions to and spending for political campaigns, political organizations, lobbyists or lobbying organizations, trade associations and other tax-exempt groups. Please indicate where this information is available in **public reporting or corporate website**.

Data Requirements

The company should 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 and trade boards. This spending includes membership fees for trade associations, industry associations and business associations.
- Registered lobbyists and lobbying groups.
- Companies do not need to report the monetary value of in-kind giving, employee volunteering or management overheads related to the activities described above.
- Note: Political Action Committee contributions by employees should not be included. However, if the company has set up a PAC for its employees and reports the company's expenditures to set up that PAC, the value is considered. Please report these PAC set-up expenses under "Other."

Source: Sustainability Accounting Standards Board and Global Reporting Initiative

Note: A commitment not to make political donations is not sufficient for marking 0 in the table. Please provide supporting evidence that the company has not made any donations/contributions in the respective years.

Coverage should be reported as a percentage of total operations, revenues, etc. as provided in the denominator question and should indicate whether the provided data represents the entire organization or only parts of it. The percentage provided in the coverage field should not represent spending as a percentage of total spending or total revenues.

- For example, if the numbers reported are only for the US operations, and the US represents 50% of company revenues, then 50% should be reported as coverage.

If all contributions and spending on political campaigns, lobbyists and trade groups are prohibited by law, please mark “The question is not applicable to the company”.

The answer for 'Contributions & Other Spending' and 'Largest Contributions & Expenditures' should correspond: for example, if "The question is not applicable to the company" or 'The company did not make any contributions' is accepted for one, it should be accepted for both. The only exception is when companies partially report on contributions. Then “Contributions & Other Spending” can be answered and “Largest Contributions & Expenditures” will become “No, the company does not report…”.

Disclosure Requirements

Disclosure requirements for partially public question:

- Additional credit will be granted for relevant publicly available evidence covering at least one figure in the last reported year.
- If no contributions were made for a specific item or category (e.g., zero political contributions in the last fiscal year), companies should publicly report this information. This should be publicly reported on the company's own website not via a third-party website or on a transparency register. As this is a quantitative question, non-public evidence is not required to support your answer but you may nonetheless upload evidence in “Documents” and reference this in the confidential additional comments.
- For the option "No, the company did not make any contributions to and spending for political campaigns, political organizations, lobbyists or lobbying organizations, trade associations and other tax-exempt groups.", the information must be available in the public domain. This should be publicly reported on the company's own website not via a third-party website or on a transparency register.

Standards & Frameworks

TNFD - Governance C**.**

Largest Contributions & Expenditures

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

Assessment Focus

Change from Last Year

Changed from 2025

Applicable Industries

All

Question Rationale

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

Question Layout

Does the company report 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?

o Yes, the company reports its largest contributions or expenditures for political and related purposes. Please indicate where this information is available.

Currency:

Issues and topics

Issue or Topic	Corporate position	Description of position/engagement	Total spend in FY 2025
	Drop-down menu: Support Support with minor exceptions Support with major exceptions Oppose No contribution		

Other large expenditures

Name of organization, candidate or topic	Type of organization	Total amount paid in FY 2025	Public reporitng
	Drop-down menu: National political organization State or local political campaign, candidates or committees Political Action Committee (PAC) Lobbying, interest representation or similar Trade association Tax-exempt group No contribution Other, please specify Not known		☐ Yes
			☐ Yes
			☐ Yes

o No, the company did not make any contributions or have any expenditures for political and related purposes. Please indicate where this information is available in **public reporting or corporate website**.

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 should be reported as one line item. The expenses may be 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 should be reported as one line item. The expenses may be related to several state ballot initiatives in the US.

Data Requirements

Companies should report their largest contributions to political campaigns or organizations, lobbyists, trade associations and other tax-exempt groups, related to individual candidates, organizations, ballot measures, referendums, or topics for which lobbying were

contracted. This includes all contributions, donations, and membership fees for trade, industry and business 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. If local legislation prevents the company from making political or other contributions, please mark "The question is not applicable to the company." and provide an explanation in the company comment box.

There are two **distinct** aspects to this question: the two top issues and the three largest single contributions/payments. As a result, there may be some overlap, if the spending on the issues is done by the trade associations. If the company's largest contributions go to trade/business associations, our preference is that you inquire with the trade association(s) to the percentage of your contribution allocated to lobbying for specific issues. If the trade association cannot provide this level of detail, an estimate will suffice. In the worst case, for the first part of this question, we ask you to report your direct lobbying expenditures only, even if the amounts are small.

Note: Please do not include contributions to charities whose main purpose is something other than supporting specific political parties or causes (e.g., organizations that primarily provide healthcare to an at-risk population or food and shelter to people below the poverty line.

The answer for 'Contributions & Other Spending' and 'Largest Contributions & Expenditures' should correspond: for example, if "The question is not applicable to the company." or 'The company did not make any contributions' is accepted for one, it should be accepted for both. The only exception is when companies partially report on contributions. Then "Contributions & Other Spending" can be answered and "Largest Contributions & Expenditures" will become "No, the company does not report…".

Disclosure Requirements

Disclosure requirements for partially public question.

- Additional credit will be granted for relevant publicly available evidence for the respective rows of the largest contributions and expenditures described. This should be publicly reported on the company's website not via a third-party website or on a transparency register.
- For the option "No, the company did not make any contributions or have any expenditures for political and related purposes." the information must be available in the public domain. This should be publicly reported on the company's own website not via a third-party website or on a transparency register.

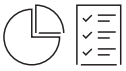
Standards & Frameworks

TNFD - Governance C.

Lobbying and Trade Associations - Climate Alignment

Public: this question requires publicly available information

Assessment Focus



Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

As more companies commit to supporting the Paris Agreement on climate change with net-zero targets and climate strategies, there is increasing scrutiny from investors and the public on how these public commitments are reinforced and whether they are contradicted by the behavior of lobbying companies. Trade associations can also be a powerful influence on public policy. There have been successful shareholder resolutions asking companies to disclose more about their lobbying activities and trade association memberships related to climate change. Companies have a responsibility to ensure their memberships do not contradict their climate strategies and to act if they do. Aligning lobbying activities and trade association memberships with the Paris Agreement helps protect the reputation of companies and ensure action on climate change is consistent and strong.

This question asks about the processes that companies have to oversee, review and disclose their climate-related lobbying activities and trade association memberships, and to ensure alignment of these with the Paris Agreement.

Question Layout

Does the company have a program to align its lobbying activities with the Paris Agreement?

- Yes, the company has a program to align its lobbying activities with the Paris Agreement. Please indicate where this information is available in **public reporting or corporate website**.

  Policy/Program aspects

  The policy/program covers the following aspects:

  - ☐ Management system in place for lobbying activities and trade association memberships.
  - ☐ Governance framework for public policy engagement with clear accountabilities up to executive level.
  - ☐ Statement of the company's position on public policies relating to climate change, which is aligned with the Paris Agreement.
  - ☐ Reviewing and monitoring process to assess whether public policy engagements and lobbying are aligned with the Paris Agreement
    - ☐ For direct lobbying activities
    - ☐ For trade associations
  - ☐ Clear framework for addressing misalignments between climate change policy positions of trade associations and the company's own climate position
  - ☐ Reporting on:
    - ☐ Climate-related direct lobbying activities
    - ☐ Climate policy positions and activities of trade associations

Scope of policy/program

Which jurisdictions are covered by the policy/program?

- All jurisdictions where we have operations
- Most jurisdictions
- Some jurisdictions only/Unspecified

Question-Specific Guidance & Definitions

Paris-aligned lobbying: Paris-aligned lobbying and public policy engagements are supportive of legislation and regulation that facilitate the Paris Agreement's goal to limit global warming to well below 2 degrees Celsius. They could also be referred to as 2-degree or 1.5-degree aligned, science-based, or net-zero by 2050 aligned. Examples of Paris-aligned lobbying could be supporting measures that promote the growth of renewable energies or supporting the introduction of a carbon price that is aligned with reaching net-zero by 2050.

Direct lobbying activities: This encompasses lobbying by in-house lobbyists or third-party lobbyists paid for or otherwise engaged by the company. Lobbying activities include direct communication and contact with lawmakers or regulatory institutions for the purpose of influencing legislation, as well as responses to consultations and other engagements intended to influence legislation.

Trade associations: These may also be referred to as business or industry associations or groups. A trade association is a body, with a membership structure that typically exists to represent the interests of a specific industry. Trade associations can also exist on a cross-industry and national level, (e.g., a national or regional chamber of commerce).

Review & monitoring process: A systematic process to assess the alignment of lobbying activities with the Paris Agreement. To be considered in this question, processes must assess alignment with the Paris Agreement or with the company's stated positions on climate-related legislation and regulation if they are aligned with the Paris Agreement. For direct lobbying activities, the review process ideally takes place before lobbying is conducted. For trade associations, the review process can take place on a regular basis or whenever new associations are joined and should assess whether the trade association supports the Paris Agreement through its lobbying and public policy engagements.

Framework for addressing misalignments: Companies should have an established framework for dealing with misalignments between a trade association's lobbying activities and the goals of the Paris Agreement. The framework should include at least two of the following options: public statements distancing the company from the misalignment, engagement with the trade association with clear timelines and an escalation process if unsuccessful, leaving the trade association, or forming proactive coalitions to counter the non-Paris-aligned lobbying.

Data Requirements

Statement of position on public policies relating to climate change, which is aligned with the Paris Agreement: Please provide information on specific climate change related policy developments (e.g., carbon credits, energy efficiency, decarbonization of specific industries) and indicate whether the company supports or opposes legislation and regulation related to these. Commitment statements are not acceptable here.

This question can be marked "The question is not applicable to the company" only if all contributions and spending on lobbyists and trade associations are prohibited by law. Please note that evidence must be available in the public domain, and this must apply to all jurisdictions where the company operates. If only one of lobbying and trade association memberships is prohibited, please follow the approach below.

If the company does not undertake any lobbying activities or is not a member of any trade association, in any jurisdiction, because one of those factors is prohibited by law or by the company's code of conduct, and this is clearly stated in the public domain, then the respective options can be ticked under "Review and monitoring

process", "Reporting on" and, in the case of no trade association memberships only, "Clear framework for addressing misalignments".

If the answer for 'Contributions & Other Spending' or 'Largest Contributions & Expenditures' is "The question is not applicable to the company.", this question should also be marked as "The question is not applicable to the company." since this question covers a subset of policy engagements, lobbying and trade associations, that the other two questions cover.

Disclosure Requirements

This question requires public evidence.

References

Guide for responsible corporate engagement in climate policy, United Nations Global Compact Caring for Climate Report
Global Standard on Responsible Corporate Climate Lobbying
Company lobbying and climate change: good governance for Paris-aligned outcomes, Grantham Research Institute on Climate Change and the Environment
Trade Associations and their Climate Policy Footprint, InfluenceMap

Standards & Frameworks

CDP 2025 - 4.11
UNGC - E1

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 customers' demand and increase profitability without negatively impacting product quality or incurring in 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.

Supplier Code of Conduct

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

AIR, ALU, ARO, ATX, AUT, BLD, BTC, BVG, CHM, CMT, CNO, COL, COM, CON, COS, CTR, DHP, DRG, ELC, ELQ, FDR, FOA, FRP, GAS, HEA, HOM, HOU, ICS, IDD, IEQ, ITC, LEG, LIF, MNX, MTC, MUW, OGR, OGX, **OIE**, PIP, PUB, REI, REM, REX, RTS, SEM, STL, TCD, TEX, THQ, TLS, TOB, TRA, TRT

Question Rationale

Companies outsource production, services and business processes as well as responsibilities, risks, and opportunities. On the one hand, outsourcing generally tends to increase a company's flexibility. On the other hand, supply chain risks may 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 primary source of information for prospective suppliers. With this question, we assess whether your company has a supplier code of conduct, whether it is public and what issues it covers.

Question Layout

Does the company have a supplier code of conduct and is it available publicly?

- Yes the company has a supplier code of conduct. Please indicate where this information is available in **public reporting or corporate website.**
  - ☐ Forced labor
  - ☐ Child labor
  - ☐ Working conditions (e.g., working hours, physical/mental demands of the workplace, wages, benefits)
  - ☐ Occupational health and safety
  - ☐ Discrimination and harassment
  - ☐ Freedom of association and collective bargaining
  - ☐ Greenhouse gas emissions and energy consumption
  - ☐ Pollution prevention and waste management
  - ☐ Resource efficiency
  - ☐ Biodiversity, no deforestation, or land conservation
  - ☐ Anti-corruption and conflict of interest
  - ☐ Anti-competitiveness

Question-Specific Guidance & Definitions

Supplier code of conduct: This describes the principles, values, standards and rules of behavior that guide the supplier's decisions, procedures, and systems 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 three components: human rights and labour, environment, and business ethics.

Human rights and labor: This includes safeguards against child labor, non-discrimination, health and safety, working conditions, working hours, compensation, right to association, and freely chosen employment.

Forced labor: This is all work and service exacted from any person under threat of penalty and for which said person has not offered their labor voluntarily. Forced labor also includes human trafficking, which is the recruitment, transportation, transfer, harboring or receipt of persons by threatening, forcing or coercing them in any way, abduction, fraud, deception, abuse of power, or a position of vulnerability, or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, conducted for the purposes of sexual exploitation, forced labor or service, slavery or practices similar to slavery, servitude, or the removal of organs.

Child labor: This is work performed by children that is mentally, physically, socially or morally dangerous and harmful to children, affecting their health and personal development, or that interferes with their compulsory schooling.

Working conditions: This covers a broad range of topics and issues, from working time (hours of work, rest periods and work schedules) to remuneration, as well as the physical conditions and mental demands that exist in the workplace.

Occupational health and safety: This is a set of interrelated or interacting elements to establish an occupational health and safety policy and objectives, and to achieve those objectives.

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

Discrimination: This is the act and result of treating a person unequally by imposing unequal burdens on them or denying them benefits due to their race, ethnicity, gender, sexual orientation, age, nationality, religion, union status, and/or marital status, instead of treating them fairly based on individual merit.

Freedom of association: This is the right of employees and workers to form, join and run their own organizations without prior authorization or interference by the state or any other entity.

Collective bargaining: This is all negotiations that take place between one or more employers or employers' organizations and one or more workers' organizations (trade unions) to determine working conditions and terms of employment or to regulate relations between employers and workers.

Environment: This includes avoiding pollution, minimizing emissions and improving the resource efficiency of supplier operations and products throughout the lifecycle.

Greenhouse gas emissions and energy consumption: This refers to emissions of the six main greenhouse gases that are covered by the Kyoto Protocol, including carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Energy consumption refers to the purchase or production and use of energy from renewable sources (e.g., hydroelectric, wind, solar, geothermal, bioenergy) and to the efficient use of energy by reducing the waste/loss of energy or upgrading equipment with lower energy consumption.

Pollution prevention and waste management: This refers to the prevention and management/disposal of by-products in business operations such as air pollutants (e.g., particulate matter, lead, sulfur

dioxide, etc.), sewage, and solid waste (including non-hazardous and hazardous waste).

Resource efficiency: This refers to organizational or technological modification in designing products/processes that allow more efficient usage of raw materials or water.

Biodiversity, no deforestation, or land conservation: This refers to the protection or promotion of natural habitats, biodiversity or management of soil to avoid loss of nutrients, erosion and land pollution. Some aspects might include, for example, (a) management of biodiversity risks by setting targets to offset any losses (no net loss) or goals to achieve a net positive impact on biodiversity; (b) prohibition of supplier operations in sites containing globally or nationally important biodiversity; (c) application of mitigation hierarchy (avoid, minimize, restore and offset) if a company is operating in areas close to critical biodiversity; and (d) land conservation efforts that include a variety of techniques such as contour farming, mulching, crop rotation, etc.

Business ethics: This refers to policies and practices that ensure the ethical conduct of the organization and associated individuals in all business activities, including, but not limited to, anti-corruption, anti-competitiveness and conflict of interest.

Anti-corruption: This refers to “abuse of entrusted power for private gain” that is instigated by individuals or organizations. It includes practices such as bribery, facilitation payments, fraud, extortion, collusion and money laundering, as well as the offer or receipt of any gift, loan, fee, reward or another advantage to or from any person as an inducement to do something dishonest, illegal or considered a breach of trust in the conduct of the enterprise’s business.

Anti-competitiveness: This refers to organization or employee actions that can result in collusion with potential competitors, with the purpose of limiting the effects of market competition. It includes, but is not limited to, cartel activities, price fixing and anti-trust activities.

Conflict of interest: This refers to a situation where an individual is confronted with choosing between the requirements of his or her function and his or her own private interests.

Data Requirements

Responsible Business Alliance Code of Conduct RBA CoC is accepted only when the company is either a 'Full' or 'Regular' member at the link below.
https://www.responsiblebusiness.org/about/members/

A company's code of conduct will only be accepted if it specifically states that meeting the code/guidelines are prerequisite for forming business ties with its suppliers, and therefore, the relevant options can be marked based on information in the code. A description in the sustainability report of this prerequisite is not sufficient.

Discrimination and Harassment: Please provide information on both discrimination and harassment.

Freedom of association and collective bargaining: Please provide information on both freedoms of association and collective bargaining.

Greenhouse gas emissions and energy consumption: Provide statements addressing greenhouse gas emissions such as carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF6), etc. AND energy consumption (e.g., hydroelectric, wind, solar, geothermal, bioenergy).

Pollution prevention and waste management: Provide statements addressing pollution and waste management of any of the following resources: air, water, land, etc. Waste management can address either solid, hazardous, non-hazardous waste or sewage. Kindly provide information on both pollution and waste management.
Anti-corruption and conflict of interest: This option require information on both aspects in the Supplier Code of Conduct

"The question is not applicable to the company" – General rule
"The question is not applicable to the company" (beyond the industries detailed below) will only be accepted for special cases. In such cases, the company must credibly explain via a comprehensive company comment and/or public reporting that it does not purchase goods or services for the purposes below. To be granted, the company must state that it:

- Does not use goods or services in its production processes.
- Does not re-sell goods or services to its customers.
- Does not use goods or services as capital goods (e.g., machines/infrastructure) in its operations.

Industry-specific Special Cases:

REI – Equity Real Estate Investment Trust (REITs): Companies that have only marked “Management of Standing Investments” as the main activity of the business in question “0.1 Denominator Area” should answer “The question is not applicable to the company”.

REM – Real Estate Management & Development: Companies that have only marked “Services” as the main activity of the business in question “0.1 Denominator Area” should answer “The question is not applicable to the company".

OIE - Energy Equipment & Services Industry: Services companies (consultancy or seismic surveying), should answer “The question is not applicable to the company".

Disclosure Requirements

- **This question requires public documents.**
- For options covering multiple topics, your supplier code of conduct must address **all** elements stated in the option. The only exception is biodiversity, deforestation or land conservation.

References

For the definition of the supplier code of conduct see UNGC’s Supply Chain Sustainability.

Standards & Frameworks

CDP 2025 - 5.11
UNGC - G2, HR/L2, HR/L2.1, E1
TNFD - Strategy B.
SFDR -A - Supplier Code of Conduct

Supplier ESG Programs

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

AIR, ALU, ARO, ATX, AUT, BLD, BTC, BVG, CHM, CMT, CNO, COL, COM, CON, COS, CTR, DHP, DRG, ELC, ELQ, FDR, FOA, FRP, GAS, HEA, HOM, HOU, ICS, IDD, IEQ, ITC, LEG, LIF, MNX, MTC, MUW, OGR, OGX, **OIE**, PIP, PUB, REI, REM, REX, RTS, SEM, STL, TCD, TEX, THQ, TLS, TOB, TRA, TRT

Question Rationale

Developing and deploying sound supplier environmental, social and governance programs is a foundational strategic and operational activity for organizations.

This question evaluates whether companies have systems/procedures in place to ensure effective internal implementation of the supplier ESG programs and to identify and address material risks and impacts resulting from supply activities. Clear and structured governance, together with internal communication and training, are needed to ensure the correct plan, implementation and improvement cycles. Organizations not only need to have systems/procedures in place to track the impact of ESG along their supply chains but also need to internally ensure that these requirements are routinely reviewed to ensure that their business demands and expectations are in line with established ESG requirements. Suppliers which provide goods or services used in the company's production processes, as well as suppliers providing goods and/or services (e.g., machines/infrastructures) that are used as operational capital goods by the purchasing company must be covered in these programs. Together with these supplier typologies, suppliers of indirect materials and/or office supplies can be included as well

Question Layout

Does the company have measures to ensure effective implementation of its suppliers' ESG programs?

- Yes, the company has measures to ensure effective implementation of supplier ESG programs. Please indicate where this information is available in **public reporting or corporate website.**
  - ☐ Please select the highest accountable decision-making body for the ESG Supply Chain Management System:
    - Board of directors
    - Executive management
  - ☐ Purchasing practices towards suppliers are reviewed to ensure the alignment of company's practices with its own Supplier Code of Conduct to avoid potential conflicts with ESG requirements.
  - ☐ Suppliers are excluded from contracting if they cannot achieve minimum ESG requirements within a set time frame.
  - ☐ Suppliers with better ESG performance are preferred in supplier selection and contract awarding.
  - ☐ Training for company's buyers and/or internal stakeholders on their roles in the supplier ESG programs.

Question-Specific Guidance & Definitions

Supplier ESG programs: For businesses to identify, assess, and plan corrective measures in relation to the sustainability of their supply chains, it is crucial to implement a robust and comprehensive supplier ESG program. A supplier-focused ESG program is the collection of activities and measures that enables businesses to recognize and assess potential ESG risks and plan remedial measures to assure solid sustainability performance along the supply chain.

Companies should make sure that this due diligence approach is deployed also within the organization, to guarantee harmonization

between ESG strategy for the supply chain and the company's purchasing practices.

ESG Supply Chain Management System accountability: Responsibility for the ESG Supply Chain Management System is essential to ensure that sustainability priorities are embedded at the core of the organization's governance. This option recognizes the highest-level decision-making body or individual who holds clear, direct and ultimate responsibility for defining, implementing, and monitoring the ESG Supply Chain Management System at a strategic level.

To guarantee the highest priority and effectiveness, the accountable body should ideally be the board of directors (including sub-committees or a named director), or alternatively, a top executive manager who is a member of the executive committee, such as the C-Suite, Senior Leadership Team (SLT) or Executive Leadership Team. This ensures that ESG supply chain management is integrated into the organization's overall strategy and decision-making processes. The CEO individually is not acceptable as the CEO is ultimately accountable for all areas of a company's operations.

Internal review of purchasing practices to avoid potential conflicts with ESG requirements: Purchasing practices not only include the choice of the material/part/product/service to be bought or the supplier from which to purchase the needed items but also include specific indications on costs and quality of the products and delivery times. It is important that the company's practices allow suppliers to comply with the company's ESG requirements. This option guarantees that the company is internally reviewing its purchasing practices to avoid potential conflicts with its ESG strategy.

Exclusion of suppliers that cannot achieve minimum ESG requirements within a set timeframe: Companies should set minimum requirements that suppliers must comply with to access tenders or be selected for contract awarding. The best practice for companies is interacting with those fundamental suppliers which do not meet these requirements and providing development opportunities with the objective of improving their performance and becoming eligible. This opportunity should have a clear timeframe set, after which suppliers unable to meet expectations should be removed from the potential supplier's list until they become eligible.

Preference of suppliers with a better ESG profile: Supplier preference rationale can vary for different industries, locations and business models. Among well-known dimensions such as price, delivery times and quality, ESG performance should also be considered. Most advanced companies incorporate ESG performance in supplier selection by including in selection methodologies a specific weight for ESG dimensions that guarantee sustainability is embedded into supplier selection and contract awarding. Similar methodologies which consider ESG performance during supplier selection / contract awarding processes are equally accepted.

Training for company's buyers and/or internal stakeholders on the Supplier ESG programs: It is crucial for companies to set up training for buyers and/or relevant internal stakeholders in their roles and on how their day-to-day actions and decisions are fundamental to reach the company's ESG objectives. Low/middle/top management training is not accepted for this option.

Data Requirements

Please provide information on supplier programs that target one or more specific dimensions/topics (i.e., programs are not required to target all E, S and G dimensions). However, programs that specifically address procurement (for example, green procurement or social procurement) are not accepted for this question.

"The question is not applicable to the company" (beyond the industries detailed below) will only be accepted for special cases. In such cases, the company must credibly explain via a comprehensive company comment and/or public reporting that it does not purchase goods or services for the purposes below. To be granted, the company must state that it:

- Does not use goods or services in its production processes.
- Does not re-sell goods or services to it's customers.
- Does not utilize goods or services as capital goods (e.g., machines/infrastructure) in its operations.

Industry-specific special cases:

REI – Equity Real Estate Investment Trust (REITs): Companies that have only marked "Management of Standing Investments" as the main activity of the business in question "0.1 Denominator Area" should answer "The question is not applicable to the company".

REM – Real Estate Management & Development: Companies that have only marked "Services" as the main activity of the business in question "0.1 Denominator Area", should answer "The question is not applicable to the company".

OIE - Energy Equipment & Services Industry: Services companies (consultancy or seismic surveying), should answer "The question is not applicable to the company".

Disclosure Requirements

This question requires public evidence. Please indicate where in your public reporting you report information about the selected options.

Standards & Frameworks

UNGC - HR/L4, E3
TNFD - Strategy B.
CDP 2025 - 5.11, 5.11.5, 5.11.6

Supplier Screening

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

AIR, ALU, ARO, ATX, AUT, BLD, BTC, BVG, CHM, CMT, CNO, COL, COM, CON, COS, CTR, DHP, DRG, ELC, ELQ, FDR, FOA, FRP, GAS, HEA, HOM, HOU, ICS, IDD, IEQ, ITC, LEG, LIF, MNX, MTC, MUW, OGR, OGX, **OIE**, PIP, PUB, REI, REM, REX, RTS, SEM, STL, TCD, TEX, THQ, TLS, TOB, TRA, TRT

Question Rationale

Companies outsource production, services and business processes as well as responsibilities, risks and opportunities. On the one hand, outsourcing generally tends to increase a company's flexibility. On the other hand, supply chain risks may 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 trying to understand supply chain risks and dependencies from the environmental, social and governance perspective as well as business operations perspective. Once a company has identified its significant suppliers, it can focus monitoring and development efforts on those with the highest risk for negative impacts and the greatest business relevance (this aspect is examined in subsequent questions). This question assesses if companies have a systematic approach to screening suppliers to identify potential sustainability risks in their supply chain. Companies that can properly identify significant suppliers will also be better positioned to prioritize their risk management measures and proactively detect issues connected to suppliers' ESG performance.

Question Layout

Does the company conduct supplier screening to systematically identify significant suppliers?

- Yes, the company conducts supplier screening to identify significant suppliers. Please indicate where this information is available in **public reporting or corporate website.**

  Please indicate which of the following aspects are considered in the company's screening process for significant suppliers.
  - ☐ Environmental
  - ☐ Social
  - ☐ Governance
  - ☐ Business relevance

  Please indicate which of the following risks are considered in the company's screening process for significant suppliers.
  - ☐ Country-specific risk
  - ☐ Sector-specific risk
  - ☐ Commodity-specific risk

Question-Specific Guidance & Definitions

Supplier screening: Supplier screening is systematic desk research on suppliers' risk of having negative ESG impacts as well as their business relevance. It considers available data sources such as country, sector or commodity ESG risks, spending, business relevance, etc. Methodology development and screening processes can be conducted by the company itself or with the support of or through external specialists. Screening can be considered the initial step in identifying potential sustainability risks in the supply chain; it is followed by assessing suppliers. At this stage, the company is not likely to be engaging directly with a supplier to screen them.

Significant suppliers: Significant suppliers are those identified as being at high risk of having negative ESG impacts or of significant business relevance to the company, or a combination of both. The company's portfolio of significant suppliers should be the key audience for its supplier ESG assessment and development program. Critical suppliers identified are also accepted as significant suppliers, even though in most cases only business relevance, and not ESG risk, is considered when identifying critical suppliers.

Environmental aspects: The risk of negative impacts related to environmental topics, including greenhouse gas emissions, energy consumption, water consumption, resource efficiency, pollution, waste or biodiversity.

Social aspects: The risk of negative impacts related to social topics, including human rights and labor rights such as child labor, forced labor, discrimination, freedom of association, right to collective bargaining, working hours, remuneration, occupational health and safety and the rights of local communities.

Governance aspects: The risk of negative impacts related to governance topics, including corruption, bribery, conflicts of interest and anti-competitive practices.

Business relevance: Business relevance considerations, including share of spend/volume and substitutability.

Country-specific risk: Risk of negative ESG impacts related to a country's political, social, economic, environmental or regulatory situation.

Sector-specific risk: Risk of negative ESG impacts related to a sector's distinct characteristics regarding labor situation, energy consumption, resource intensity, emissions and pollution potential (e.g., manufacturing, service provision, agriculture).

Commodity-specific risk: Risk of negative environmental, social, and governance impacts related to a commodity's supply chain structure, labor situation, land-use and resource intensity, energy consumption, emissions, material toxicity and pollution potential (e.g., metals, fossil fuels, wood, soy, cotton)

Data Requirements

This question requires a risk screening to be carried out by the company or a third party; therefore a self-assessment conducted by suppliers, or generally using the EcoVadis platform, is not be acceptable as the EcoVadis assessment collects supplier policies practices and performance and qualifies as a supplier desk assessment with verification of evidence (see supplier assessment and development question). We will only accept the use of EcoVadis if it is specified that the risk maps or risk screening tools provided were used for this purpose (e.g., EcoVadis IQ Plus).

"The question is not applicable to the company" – General rule

"The question is not applicable to the company" (beyond the industries detailed below) will only be accepted for special cases. In such cases, the company must credibly explain via a comprehensive company comment and/or public reporting that it does not purchase goods or services for the purposes below. To be granted, the company must state that it:

- Does not use goods or services in its production processes.
- Does not re-sell goods or services to its customers.
- Does not utilize goods or services as capital goods (e.g., machines/infrastructure) in its operations.

Industry-specific special cases:

REI – Equity Real Estate Investment Trust (REITs): companies that have only marked "Management of Standing Investments" as the main activity of the business in question "0.1 Denominator Area" should answer "The question is not applicable to the company".

REM – Real Estate Management & Development: companies that have only marked "Services" as the main activity of the business in question "0.1 Denominator Area", should answer "The question is not applicable to the company".

OIE - Energy Equipment & Services Industry: Services companies (consultancy or seismic surveying), should answer "The question is not applicable to the company".

Disclosure Requirements

Supporting evidence:

This question requires public evidence. Please indicate where in your public reporting you report information about the selected options.

Standards & Frameworks

UNGC - G4, G4.1

CDP 2025 - 8.14, 5.11.6

Supplier Assessment and Development

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

AIR, ALU, ARO, ATX, AUT, BLD, BTC, BVG, CHM, CMT, CNO, COL, COM, CON, COS, CTR, DHP, DRG, ELC, ELQ, FDR, FOA, FRP, GAS, HEA, HOM, HOU, ICS, IDD, IEQ, ITC, LEG, LIF, MNX, MTC, MUW, OGR, OGX, **OIE**, PIP, PUB, REI, REM, REX, RTS, SEM, STL, TCD, TEX, THQ, TLS, TOB, TRA, TRT

Question Rationale

This question is to assess if companies have a systematic approach to evaluating suppliers and their subsequent development to meet company requirements. This should be with an overall goal of a shared mindset leading to improved and scalable impact in the supply chain. Companies not only outsource production, services and business processes but responsibilities, risks and opportunities as well. Outsourcing 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. Supplier assessment and development measures to assess and improve individual suppliers' performance are usually implemented after the initial supplier screening, which aims to identify supplier risks through desk research.

This question is divided into two parts: what the supplier assessment process includes and what the supplier development process includes.

Question Layout

Does the company have a process for supplier assessment and development?

- ○ Yes, the company has a process for supplier assessment and development. Please indicate where this information is available in **public reporting or corporate website.**

  Supplier assessment

  - ○ Yes, the company has a publicly available supplier assessment process in place, which includes the following:
    - ☐ Supplier desk assessments with systematic verification of evidence
    - ☐ Supplier on-site assessments carried out by purchasing company employees or contracted consultant (2nd party assessment)
    - ☐ Supplier on-site assessments carried out by an independent accredited auditing body (3rd party assessment)
    - ☐ Supplier assessments (desk or on-site) are carried out using standards and methodologies of a recognized industry or multi-stakeholder initiative. Please provide name/description:
    - ☐ Supplier corrective action/improvement plans
  - ○ No, the company does not have a supplier assessment process in place.

  Supplier development

  - ○ Yes, the company has a supplier development process in place which includes the following:
    - ☐ Supplier information/trainings on company's supplier ESG program, process and requirements
    - ☐ Supplier access to ESG benchmarks against peers
    - ☐ Supplier support (remote/on-site) on implementation of corrective/improvement actions
    - ☐ In-depth technical support programs to build capacity and ESG performance in suppliers
  - ○ No, the company does not have a supplier development process in place.

Question-Specific Guidance & Definitions

Assessment process

Supplier assessment process: A process in which suppliers are evaluated to obtain information on their practices in order to measure and monitor their performance. The assessment process can be carried out in order to reduce costs, mitigate risks and drive improvement. The benefits of carrying out this process include increased performance visibility, aligning customer and supplier business practices, and risk mitigation.

Supplier desk assessments with systematic verification of evidence: This type of supplier assessment is realized by, or on behalf of, the purchasing company. It generally takes the form of a questionnaire, in which suppliers are requested to provide information and supporting evidence on their environmental, social and governance policies, practices, performance and public disclosures. This information is then reviewed, verified and analyzed, resulting in an appraisal of the supplier's ESG performance, possibly with a score. This is considered to be systematic verification because established specifications and requirements are met. Supplier desk assessments are more company-specific than supplier screenings (see question supplier screening) as they assess the information provided by the supplier and are usually realized in a subsequent stage of the supplier assessment process. Desk assessments do not include onsite assessments of the supplier. Purchasing companies can implement their own supplier desk assessment tools or can use tools of external providers, such as Responsible Business Alliance risk-based Self-Assessment Questionnaire, EcoVadis, Together for Sustainability, Achilles, Higg Facility Environmental Module (with remote verification), etc.

2nd party supplier onsite assessments: These are carried out by employees of the purchasing company or contracted consultants. These auditors do not need to be approved or accredited by the standard-setting organization or an accreditation body.

3rd party supplier onsite assessments: These are carried out by independent third party auditing organizations that are approved/accredited by the standard-setting organization (e.g., amfori BSCI, Responsible Business Alliance, Higg Facility Environmental Module) or by an accreditation body along the requirements of ISO/IEC 17021 Conformity assessment — Requirements for bodies providing audit and certification of management systems (e.g., SA8000, ISO standards).

Supplier on-site assessments are on-site supplier visits by an auditor to assess the supplier's ESG operations, policies, systems and performance, usually involving document and record reviews; site tours; and interviews with company representatives, employees and other stakeholders. Applied methodologies can consist of their own checklists or standards and methodologies of a recognized industry or a multi-stakeholder initiative. On-site assessments can also include virtual assessments or supplier employee surveys.

Supplier assessments (desk or onsite) are carried out using standards and methodologies of a recognized industry or multi-stakeholder initiative: Desk or on-site assessments that are carried out following standards and methodologies of a recognized industry or multi-stakeholder initiatives such as SMETA, Responsible Business Alliance, amfori BSCI, Responsible Minerals Initiative, SAI Platform or others.

Supplier corrective action plans: An important quality management tool for any business or supplier. A corrective action plan is a method of documenting non-compliance issues; identifying their root causes; and capturing measurable, achievable solutions and realistic deadlines.

Development process

Supplier information/training: Provides the supplier with information and/or training on the purchasing company's supplier ESG program. This can be accomplished through various mediums. The content can include specific inputs on one topic, inputs on multiple ESG topics and best practices or information on the company's assessment and development process.

Supplier access to ESG benchmarks: This involves suppliers being provided with access to information on how other suppliers are performing. This can include performance information on specific areas or case studies on how other suppliers achieved that level of performance.

Supplier support (remote/onsite) on implementation of corrective/improvement actions: The company provides guidance and support on the implementation of corrective and improvement actions. This can happen remotely or through supplier on-site visits.

In-depth technical support programs to build capacity and ESG performance in suppliers: Comprehensive capacity building programs to systematically improve supplier practices and performance on specific ESG topics (e.g., energy efficiency, chemical management, health & safety management, working hours reduction) through training, baseline assessments, collaborative system development and progress measurement. Capacity building is defined as the process of developing and strengthening the knowledge, skills, instincts, abilities, processes, and resources that organizations need to survive, adapt, and thrive in a fast-changing world. Such programs go beyond corrective action support and usually take six or more months to implement. These technical support programs are long-term and sustained over time with the aim of improving ESG performance rather than solely implementing action plans.

Data Requirements

If a company selects that yes, they have an assessment and/or development process but does not select any of the subsequent options then the answer will not be accepted.

"The question is not applicable to the company" – General rule

"The question is not applicable to the company" for this question (beyond the industries detailed below) will only be accepted for special cases. In such cases, the company must credibly explain via a comprehensive company comment and/or public reporting that it does not purchase goods or services for the purposes below. To be granted, the company must state that it:

- Does not use goods or services in its production processes.
- Does not re-sell goods or services to its customers.
- Does not utilize goods or services as capital goods (e.g., machines/infrastructure) in its operations.

Industry-specific special cases:

REI – Equity Real Estate Investment Trust (REITs): Companies that have only marked “Management of Standing Investments” as the main activity of the business in question “0.1 Denominator Area” should answer "The question is not applicable to the company".

REM – Real Estate Management & Development: Companies that have only marked “Services” as the main activity of the business in question “0.1 Denominator Area”, should answer "The question is not applicable to the company".

OIE - Energy Equipment & Services Industry: Services companies (consultancy or seismic surveying), should answer "The question is not applicable to the company".

Disclosure Requirements

We expect publicly available information for this question. It is possible that a company only publicly reports on its assessment process and not on the development process. Therefore, the company has the option to provide public reporting for one part and select that they do not carry out the other option.

Supporting evidence:

- The document(s) the company attaches will be used to verify the qualitative part of the response. Any qualitative response that cannot be verified in the attached document(s) or via the information provided in the related question text field (if available) will not be accepted.
- Supporting documents need to be available in the public domain.
- Information related to the assessment and development process can be in separate documents, for example, a responsible sourcing strategy and a sustainability report. Scattered information that does not clearly relate will not be accepted.

Standards & Frameworks

CDP 2025 - 8.16, 5.11.6, 5.11.7
UNGC - HR/L4, E3, AC4

KPIs for Supplier Assessment and Development

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

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

AIR, ALU, ARO, ATX, AUT, BLD, BTC, BVG, CHM, CMT, CNO, COL, COM, CON, COS, CTR, DHP, DRG, ELC, ELQ, FDR, FOA, FRP, GAS, HEA, HOM, HOU, ICS, IDD, IEQ, ITC, LEG, LIF, MNX, MTC, MUW, OGR, OGX, **OIE**, PIP, PUB, REI, REM, REX, RTS, SEM, STL, TCD, TEX, THQ, TLS, TOB, TRA, TRT

Question Rationale

It is important to monitor the coverage and progress of supplier screening and subsequent assessment and development programs to ensure that risks are identified and managed and that a company is acting responsibly by building capacity within its supply chain. This question aims to find out whether companies track the number of different suppliers they have, how many are assessed, and how many are identified as having significant actual/potential negative impacts. The purpose is to ascertain how many of these suppliers are supported in improving their actions and in what ways.

Question Layout

Does the company monitor and report on the coverage and progress of its supplier screening, assessment and development programs?

- ○ Yes, the company monitors and reports on the coverage and progress of its supplier screening, assessment and development programs in the last financial year. Please indicate where this information is available.

  Scope of reporting
  - ○ Tier-1 suppliers only
  - ○ Tier-1 and non-Tier-1 suppliers
  - ○ Not known

  ☐ Coverage of the supplier screening, assessment, and development programs

  For data points **1.2** to **1.7**, please report the number of **unique and significant suppliers** (i.e., suppliers with high sustainability risks and/or business relevance). Please refer to the ***Infotext*** for the definition

KPI for supplier assessment and development	FY 2025	Percentage (calculated)	Public reporting
1.1 Total number of unique suppliers			☐ Yes
1.2 Number of unique significant suppliers			☐ Yes
1.3 Number of unique significant suppliers supported with development measures (as a subset of 1.2)		% of suppliers supported in development measures	☐ Yes
1.4. Number of unique significant suppliers assessed via desk assessments/on-site assessments (as a subset of 1.2)		% of unique significant suppliers assessed	☐ Yes
1.5. Number of unique significant suppliers assessed with substantial actual/potential negative impacts (as a subset of 1.4)			☐ Yes
1.6. Number of unique significant suppliers with substantial actual/potential negative impacts with agreed corrective action/improvement plan (as a subset of 1.5)		% of suppliers with substantial actual/potential negative impacts with agreed corrective action/improvement plan	☐ Yes
1.7. Number of unique significant suppliers with substantial actual/potential negative impacts that were terminated (as a subset of 1.5)			☐ Yes

☐ The data has been third-party verified.

Question-Specific Guidance & Definitions

Scope of Reporting: Covers the scope or boundaries of data reported in the table. For example, if a company selects "Tier-1 suppliers only" as the scope, all data points in the table apply only to Tier-1 suppliers and need to be consistent throughout.

Coverage of the supplier screening, assessment and development programs: Refers to the results of supplier screening, assessment, and development programs of the company. The figures provided in the table should align with the **Scope of reporting**. For example, if a company selects "Tier-1 suppliers only" as the scope, all data in the table applies only to Tier-1 suppliers and needs to be consistent throughout.

Unique suppliers: Refers to the number of individual (or unique) suppliers reported by the company, consistent with the Scope of Reporting (i.e., Tier-1 only, or Tier-1 and non-Tier-1). The CSA methodology specified unique suppliers to prevent confusion with assessment or development measures. For example, if one individual supplier has been assessed multiple times in the same financial year, it must only be counted as one unique supplier assessed. The Total number of unique suppliers, hence, covers all individual suppliers reported within the Scope of Reporting.

Unique significant suppliers: Refers to the number of individual (or unique) suppliers that are identified as having substantial risks of negative ESG impacts or significant business relevance to the company or a combination of both. The portfolio of suppliers with sustainability priority should be the key audience of a company's supplier ESG monitoring and development program. Strategic or critical suppliers identified are also accepted as significant suppliers, even though, in most cases, only business relevance is considered when identifying critical suppliers.

Therefore, for data points **1.2 to 1.7,** the company should refer to their unique significant suppliers. If the Scope of Reporting is tier-1 supplier only, the data points 1.2 to 1.7 apply to unique significant tier-1 suppliers; if the Scope of Reporting is Tier-1 and Non-tier-1 suppliers, then data points 1.2 to 1.7 apply to all unique significant suppliers within the company's supply chain that the company can report.

Supplier screening: Systematic desk research of suppliers' risk for negative environmental, social and governance impacts, and/or their business relevance. These risks or impacts include, but are not limited to, business relevance, spend, country, sector, or commodity, ESG risks, etc. The methodology development and screening process can be carried out by the company itself or with the support of external specialists.

Development measures: Include both onsite, remote training, or support activities to help suppliers improve ESG performance. These range from general training to short-term corrective action support, where guidance is provided to implement specific improvements, to long-term capacity-building programs.

Desk assessments: This type of supplier assessment is realized by, or on behalf of, the purchasing company. It is generally a questionnaire where suppliers are asked to provide information and supporting evidence on their ESG policies, practices, performance and public disclosures. This information is then reviewed, verified and analyzed, resulting in an appraisal of the supplier's ESG performance, possibly with a score. This process is considered systematic verification because established specifications and requirements are met. Supplier desk assessments are more elaborate than supplier screenings (see Supplier Screening question) as they assess the information provided by the supplier and are usually realized in a subsequent stage of the supplier assessment process. Desk assessments do not include on-site assessments of the supplier. Purchasing companies can implement their own supplier desk assessment tools or can use the tools of external providers.

For supplier desk assessments, companies can use a third-party tool/methodology/online system to evaluate the supplier and ensure a thorough review and appraisal of the information provided. This allows them to share the assessment results with other companies that might want to procure from them. This could be the Responsible Business Alliance Risk-based Self-Assessment Questionnaire, EcoVadis, Together for Sustainability, Achilles, Higgs Facility Environmental Module (with remote verification), etc.

Supplier on-site assessments: Are on-site supplier visits by an auditor to assess the supplier's ESG operations, policies, systems and performance. They usually involve document and record reviews; site tours; and interviews with company representatives, employees and other stakeholders. Applied methodologies can consist of their own checklists or standards, or those of a recognized industry or multi-stakeholder initiative.

2nd party supplier on-site assessments: Carried out by employees of the purchasing company or by contracted consultants. These auditors do not need to be approved or accredited by the standard-setting organization or by an accreditation body.

3rd party supplier on-site assessments: Carried out by independent third-party auditing organizations that are approved/accredited by the standard-setting organization (e.g., amfori BSCI, Responsible Business Alliance, Higg Facility Environmental Module) or by an accreditation body along the requirements of ISO/IEC 17021 Conformity assessment — requirements for bodies providing audit and certification of management systems (e.g., SA8000, ISO standards).

Substantial actual/potential negative impacts: In the GRI Standards, unless otherwise stated, "impact" refers to the effect an organization has on the economy, the environment and/or society, which in turn can indicate its contribution (positive or negative) to sustainable development. Negative impacts include those that are either caused or contributed to by an organization, or that are directly linked to its activities, products or services by its relationship with a supplier. Actual impacts are those that have happened, while potential impacts are those that may occur where actions can be taken by the company to prevent, mitigate or remediate the impacts. Substantial can be defined as a critical or major noncompliance with minimum requirements leading to severe damage to the environment or people's physical or psychological integrity or to the systematic failure of the supplier to protect people or the environment from harm.

Supplier corrective action plan: A corrective action plan (CAP) is an important quality management tool for any business or supplier. A CAP is a method of documenting noncompliance issues, identifying their root causes, and capturing measurable, achievable solutions and realistic deadlines. This refers to suppliers that are in the process of implementing their CAP.

Data Requirements

The scope of reporting needs to be selected for the response to be accepted. This refers to the data reported in the whole table. For example, if you select Tier-1 suppliers only as the reporting scope, the data in the table applies only to Tier-1 suppliers.

We expect the data from data points 1.2 to 1.7 in the table to relate to the number of **unique significant suppliers.**

Data points "1.3. Total number of unique significant suppliers supported with development measures" and "1.4. Total number of unique significant suppliers assessed via desk assessments/on-site assessments" of this question must be less than or equal to data point "1.2. Total number of unique significant suppliers."

We also expect data point "1.6. Number of unique significant suppliers with substantial actual/potential negative impacts with agreed corrective action/improvement plan" to be less than or equal to data point "1.5. Number of suppliers unique significant assessed with substantial actual/potential negative impacts".

Third-Party Verification

Third-party verification is accepted if at least one of the metrics is verified by a third party. Data must be verified for the most recent financial year by an appropriate verification or auditing firm. Government verification is not considered relevant.

Not applicable – General rule

"Not applicable" for this question (beyond the industries detailed below) will only be accepted for special cases. In such cases, the

company must credibly explain via a comprehensive company comment and/or public reporting that it does not purchase goods or services for the purposes below. To be granted "Not applicable" the company must state that it:

- Does not use goods or services in its production processes.
- Does not re-sell goods or services to its customers.
- Does not utilize goods or services as capital goods (e.g., machines/infrastructure) in its operations.

Industry-specific special cases:

REI – Equity Real Estate Investment Trust (REITs): Companies that have only marked "Management of Standing Investments" as the main activity of the business in question "0.1 Denominator Area" should answer "The question is not applicable to the company" for this question.

REM – Real Estate Management & Development: Companies that have only marked "Services" as the main activity of the business in question "0.1 Denominator Area", should answer "the question is not applicable to the company" for this question.

OIE - Energy Equipment & Services Industry: Services companies (consultancy or seismic surveying) should answer "the question is not applicable to the company" for this question.

Disclosure Requirements

Disclosure Requirements for Partially Public Questions:

Additional credit will be granted for relevant publicly available evidence covering the data points in this question.

Standards & Frameworks

CDP 2025 - 5.11.6

UNGC - G5.1

TNFD - Annex 2 - A22.0 Dependency, impact, risk and opportunity management - Value chain, Annex 2 - A22.1 Dependency, impact, risk and opportunity management - Value chain, Metals - MM.A23.4 - Dependency, impact, risk and opportunity management: Changes to nature (dependency and impact): mitigation hierarchy steps - Suppliers screened for nature-related risks

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.

Tax Strategy and Governance

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

ALU, ATX, AUT, BNK, BTC, BVG, CHM, CMT, CNO, COL, COM, CON, COS, CSV, CTR, DHP, DRG, FBN, FDR, FOA, FRP, HOU, IMS, INS, ITC, LEG, LIF, MNX, MTC, OGR, OGX, **OIE**, PUB, REM, REX, RTS, SEM, SOF, STL, TEX, THQ, TLS, TOB, TRT, TSV

Question Rationale

Tax avoidance strategies are usually set up in a legally sound way. Therefore, general statements about a company's intention to comply with all tax laws and regulations in its countries of operation are not sufficient. Every company should be able to give a coherent justification of their approach to key tax issues such as the use of tax minimization techniques in line with their approach to other corporate social responsibility 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 the company has a group-wide tax policy or strategy available in the public domain that addresses sensitive or high-risk tax issues in a clear and sustainable way.

Question Layout

Does the company have a group-wide commitment on tax strategy and governance and is it available publicly?

- Yes, the company has a group-wide commitment on tax strategy and governance. Please indicate where this information is available in **public reporting or corporate website.**

  Commitment aspects

  The commitment covers the following aspects:

  - ☐ 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 to not transfer value created to low-tax jurisdictions
  - ☐ A commitment to not use tax structures without commercial substance
  - ☐ A commitment to undertake transfer pricing using the arm's length principle
  - ☐ A commitment not to use secrecy jurisdictions or so-called tax havens for tax avoidance

  Commitment endorsement

  - ☐ Please select the highest endorsing decision-making body:
    - Board of directors
    - Executive management

Question-Specific Guidance & Definitions

Tax avoidance: Tax avoidance is an abuse of the tax system. It is a deliberate attempt to get out of an obligation to pay tax by entering into a set of artificial financial arrangements with little or no commercial purpose other than to reduce a tax bill. Tax avoidance is unethical in that it seeks to undermine tax law and public policy and it is frequently found to be unlawful. Tax avoidance can be within the letter, but not the spirit, of the law. (Source: TaxWatch)

The spirit of the tax laws: This refers to the intention of the policymaker who wrote the respective law.

The letter of the law: This refers to the literal interpretation of the law only.

Low tax jurisdiction: For this question, low tax jurisdiction refers to any jurisdiction with significantly lower tax rates than other jurisdictions in which the company operates.

The arm's length principle: This valuation principle is commonly applied to commercial and financial transactions between related companies. It says that transactions should be valued as if they had been carried out between unrelated parties, each acting in their own best interest.

Tax havens: (Offshore) countries or jurisdictions offering little or no tax liability. Tax havens may share limited or no financial information with foreign tax authorities and may not require businesses to operate out of their country to receive tax benefits.

Data Requirements

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

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: It will not be accepted if the information is merely a commitment to complying with the law, without a clear commitment to also comply with the spirit or intent of the law.

Policy endorsement: A statement that the commitment/policy is approved, overseen, reviewed or adopted by the board of directors or executive management. A policy can also be signed by the respective executive directors.

FBN industry: For a RIC (Regulated Investment Company) and for REIT companies, the criterion should be marked **"The question is not applicable to the company"** because these companies usually do not pay income taxes.

For companies that are Master Limited Partnerships (MLPs), this question can be marked **"The question is not applicable to the company"** because due to their structure, these companies usually do not pay corporate income taxes.

The questions in this criterion should be marked "The question is not applicable to the company":

- if the company's business model is to sell products but has 0 sales (even if they have revenues).
- for any new company that does not yet sell products (zero sales) because the company was recently launched, and its main product is still in R&D phase (e.g., clinical-stage biopharmaceutical companies).

Disclosure Requirements

Supporting evidence:

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

Any response that cannot be verified in the attached public document(s) will not be accepted.

Standards & Frameworks

SFDR - M - UNGC and OECD Compliance Mechanisms

Tax Reporting

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

ALU, ATX, AUT, BNK, BTC, BVG, CHM, CMT, CNO, COL, COM, COS, CSV, CTR, DHP, DRG, FBN, FDR, FOA, FRP, HOU, IMS, INS, ITC, LEG, LIF, MNX, MTC, OGR, OGX, **OIE**, PUB, REM, REX, RTS, SEM, SOF, STL, TEX, THQ, TLS, TOB, TRT, TSV

Question Rationale

Leading companies have realized that public reporting on their revenue, operating profits and tax on a country-by-country basis helps build trust in their corporation and complements reporting on their broader economic contribution. In combination with key information about the names and tax residence of all constituent entities, the main activities by tax jurisdiction as well as the average number of employees help investors better understand a company's tax profile and potential exposure to tax risks. If tax payments differ from expected rates in a given jurisdiction, proactive companies can steer and facilitate the discussion about their tax contributions with all their stakeholders by explaining the reasons behind the difference in their reporting.

In this question, we aim to identify to what extent companies report key information about their tax contributions in all tax jurisdictions where the entities included in their organization's audited consolidated financial statements are resident for tax purposes.

Question Layout

Does the company report on key business, financial and tax information for each tax jurisdiction in which it operates?

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

Question-Specific Guidance & Definitions

A constituent entity is a separate business unit, or subsidiary, of a multinational enterprise group that is included in the consolidated group for financial reporting purposes. This includes a permanent establishment if a separate income statement is prepared for regulatory, financial, internal management or tax purposes.

A description of the primary activities by jurisdiction can be in the form of a short statement regarding the nature of the trade in the respective location (e.g., sales, marketing or distribution, manufacturing or production, purchasing or procurement, research and development, holding or managing intellectual property, etc.).

Revenues: All revenue, (extraordinary) gains and income, or other inflows shown in the financial statement prepared in accordance with the applicable accounting rules relating to profit and loss, such as the income statement or profit and loss statement, should be reported as revenue.

Profit (loss) before tax: Also referred to as pretax profit (loss), pretax income, or earnings before tax (EBT). We also accept operating profit, or earnings before interest and tax (EBIT).

Income tax accrued (current year) is the amount of accrued current tax expense recorded on taxable profits or losses for the reporting fiscal year of all constituent entities resident for tax purposes in the relevant tax jurisdiction irrespective of *whether or not the tax has been paid* (e.g., based on a preliminary tax assessment). The current tax expense only reflects operations in the current year and does not include deferred taxes or provisions for uncertain tax liabilities. However, for the purpose of this question, country-by-country reporting on income tax expense, corporate income tax or current tax provisions is also accepted.

Income tax paid (on cash basis) is the amount of corporate income tax actually paid during the reporting fiscal year, which should include advanced payments fulfilling the relevant fiscal year's tax obligation as well as payments fulfilling the previous year(s)' tax obligation (e.g., payment of the unpaid balance of corporate income tax accrued in relation to the previous year(s), including payments related to reassessments of previous years), regardless of whether those taxes have been paid under protest. Consolidated taxes paid that include other items such as value-added tax, social security taxes, and regional or industry-specific taxes are not accepted.

The amount of income tax accrued (current year) and income tax paid (on cash basis) should be reported independently.

The number of employees should reflect the average number of full-time equivalents during the reporting fiscal year, or a similar number, provided that it is applied consistently across the jurisdictions. Reasonable rounding is permissible if it does not materially distort the relative distribution of employees across tax jurisdictions.

Data Requirements

Please note: The tax data disclosed should fully reconcile with the corresponding information in the latest reported consolidated income statement.

To receive credit for comprehensive **country-by-country reporting**, we expect the countries reported on to cover at least 90% of the respective financial metric. This means that to receive credit for all boxes, we expect distinct disclosure for each of the financial metrics below, disclosing at least 90% of the respective consolidated total values in the income statement:

- Revenue
- Profit (loss) before tax
- Income tax accrued (current year)
- Income tax paid (cash basis)

To receive credit for public reporting on the non-financial metrics (i.e., names of constituent entities, the primary activities, and the number of employees), companies are expected to clearly state that the information includes all constituent entities of the organization. Additionally, for any of these non-financial metrics to be accepted, at least one of the financial metrics mentioned above has to be accepted as well.

If at least 90% of the respective metric (e.g., revenue) comes from **one country** (e.g., "domestic"), the remaining amount of the respective metric must be summarized as "other", "foreign", "international" or similar. The disclosed metrics must fully reconcile with the corresponding figures in the consolidated income statement.

If there is more than one constituent entity in a jurisdiction, the numbers can be reported on an aggregate basis at a jurisdictional level. Accordingly, data should be reported on an aggregated basis, regardless of whether the transactions occurred cross-border or within the jurisdiction, or between related parties or unrelated parties. If possible, companies should report consolidated figures if consolidated data can be reported for each jurisdiction. Companies should state clearly if the data is reported on an aggregated or consolidated basis.

Special note for companies subject to zakat (Islamic tax): If the company operates in a single jurisdiction and only owes zakat as taxes (and not income tax), or reports both zakat and income tax combined, the reporting of these taxes may be accepted under "Income tax accrued" and "Income tax paid".

If the company does not operate in a single jurisdiction and only reports on income tax and zakat combined, the reporting of these combined taxes may NOT be accepted under "Income tax accrued" and "Income tax paid".

FBN industry: For a RIC (Regulated Investment Company) and for REIT companies, the criterion should be marked **"The question is not applicable to the company"** because these companies usually do not pay income taxes.

For companies that are Master Limited Partnerships (MLPs), this question can be marked **"The question is not applicable to the company"** because due to their structure, these companies usually do not pay corporate income taxes.

The questions in this criterion should be marked "The question is not applicable to the company":

- if the company's business model is to sell products but has 0 sales (even if they have revenues).
- for any new company that does not yet sell products (zero sales) because the company was recently launched, and its main product is still in R&D phase (e.g., clinical-stage biopharmaceutical companies).

References

OECD / G20: Base Erosion and Profit Shifting – Action 13.

Effective Tax Rate

Flexible: Public information requirements depend on if the company is listed or non-listed.

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

ALU, ATX, AUT, BNK, BTC, BVG, CHM, CMT, CNO, COL, COM, COS, CSV, CTR, DHP, DRG, FBN, FDR, FOA, FRP, HOU, IMS, INS, ITC, LEG, LIF, MNX, MTC, OGR, OGX, **OIE**, PUB, REM, REX, RTS, SEM, SOF, STL, TEX, THQ, TLS, TOB, TRT, TSV

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 appear so. Long-term financial risks can also develop from arrangements that are later determined to be eroding the tax base of other countries or provide an unfair subsidy. These arrangements may be deemed illegal, incurring fines and penalties, or new regulations may be implemented that raise the tax obligation of companies. At the same time, regulatory bodies are increasing the enforcement of existing rules.

The Organisation for Economic Co-operation and Development commenced the BEPS project in 2015 to address these issues and the EU has been aggressive in targeting companies and countries it believes have illegal agreements, for example, those in violation of state aid rules. The European Commission announced in March 2018 that it 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) to impose an interim tax on certain revenue 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

Does the company report the tax rate (income statement) and cash tax rate (cash flow statement) for the last two financial years?
Listed companies are required to provide links to public reports or corporate websites.
Non-listed companies are required to provide internal documents and/or links to public reports or corporate websites.

- Yes, the company reports the tax rate (income statement) and cash tax rate (cash flow statement) for the last two financial years.

Currency:

Financial reporting	FY 2024	FY 2025	Calculated average rate
Earnings before tax			
Reported taxes			
Cumulative acceptable adjustments* (see below)			
Effective tax rate (in percentage)			*Automatic calculation of the company's reported taxes in the two-year period (with adjustments) divided by the earnings before tax in the two-year period.*
Cash taxes paid			
Cash tax rate (in percentage)			*Automatic calculation of the company's cash taxes paid in the two-year period divided by the earnings before tax in the two-year period.*

*Note: If the calculated average tax rate and/or cash tax rate is lower than the industry group averages shared via the information text, please specify the reason why, indicate the tax amount per item and provide explanations in the table below.
If the aspect *reduced* the tax burden (tax benefit), please indicate the impact as a negative number; however if the aspect *increased* the tax burden (tax expense), please indicate the impact as a positive number. On the basis of the numbers inputted, the rate above will be auto-calculated. Please double-check that figure to ensure that the reported aspects have the correct sign.

Reason	Tax impact FY 2024	Tax impact FY 2025	Explanation
☐ **Group-wide net operating losses (in FY2024 or FY2025)**			
☐ **Single jurisdiction tax code (maximum 10% sales abroad and domestic corporate income tax rate below the posted industry group average)**			
☐ **Non-recurring (one time) operating losses in own operations**			
☐ **Net operating losses from prior periods and/or acquired companies**			
☐ **Timing - Major issues outside of the two-year period reported (including accounting adjustments for prior reporting periods due to major tax policy changes)**			

Question-Specific Guidance & Definitions

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

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

Cash taxes: The amount of taxes paid to governmental authorities as indicated in the cash flow statement of that fiscal year.

- For example, for fiscal year 2018 please provide all cash taxes paid during fiscal year 2018, regardless of the period in which the tax liability arose in.

Special note for companies subject to zakat (Islamic tax)
Zakat is a tax on assets and therefore qualifies as a wealth tax, not an income tax. In this question, we focus on income tax only. Therefore, zakat should be excluded from the reported taxes and cash taxes paid sections.

If the company operates in a single jurisdiction and only owes zakat as taxes (and not income tax), please mark "The question is not applicable to the company". Please leave both tables empty and provide explanations in the comment box below. Please follow the same approach if the company operates in a single jurisdiction and reports on income tax and zakat combined (e.g., taxation and zakat).

If the company does not operate in a single jurisdiction but only reports on income tax and zakat combined, please leave the cash tax paid box empty and provide explanations in the comment box below.

Tax impact (in the second table explaining low taxes): If the taxes reported or paid in cash are lower than expected, companies may have non-recurring items (e.g., net operating losses from acquired companies, major write-offs that cause temporary losses, tax settlement, etc.) that explain the low tax rate. The tax impact entered in the second table is the amount of tax that should be added back to

the reported cash tax amounts reported in the first table, leading to a higher reported tax rate or cash tax rate.

Group-wide net operating losses: In case a company has group-wide net operating losses, there shall be no associated tax 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., the write-off of a large investment, large settlement or fine) that would offset ongoing income generated.

Net operating losses from prior periods and/or acquired companies: This option can be marked if net operating losses from prior periods are used to offset taxable income in future periods, reducing the overall tax liability. It can also be marked when a company acquires another company that has net operating losses and utilizes those losses to offset its own taxable income.

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, those countries will have a lower tax rate than the average in the industry. If your company has more than 90% of sales domestically, this option can be ticked.

Timing – Issues outside of the two years period: This option refers to an event that happened outside of the two reporting years in the question and was carried forward to the last two fiscal years. This could be losses from a company's own operations as described above, or due to governmental tax reforms, including accounting adjustments for prior reporting periods due to major tax policy changes. Net deferred tax assets/liabilities is not acceptable as a tax issue.

The net change in valuation allowance can be accepted as a timing issue, provided the specific effect is clearly described in the public reporting.

Data Requirements

Earnings before tax (EBT) may also be known as operating income before tax or profit before tax and is often a unique line item on the income statement. Two years of data is required.

To get a sense of whether your company's "calculated average tax rate and/or cash tax rate is lower than it might be expected by a stakeholder", please review the Average Effective Tax Rate & Cash Tax Rate for each of the 24 GICS® Industry Groups in the CSA Handbook.

To establish these industry group-specific thresholds, we have updated our original, Bloomberg-based research on the basis of the data collected via the CSA. 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.

FBN industry: For a RIC (Regulated Investment Company) and for REIT companies, the criterion should be marked **"The question is not applicable to the company"** because these companies usually do not pay income taxes.

For companies that are Master Limited Partnerships (MLPs), please mark "The question is not applicable to the company" because due to their structure these companies usually do not pay corporate income taxes.

The questions in this criterion should be marked "The question is not applicable to the company":

- if the company's business model is to sell products but has 0 sales (even if they have revenues).
- for any new company that does not yet sell products (zero sales) because the company was recently launched, and its main product is still in R&D phase (e.g., clinical-stage biopharmaceutical companies).

Disclosure Requirements

Disclosure of the following items for the last two fiscal years:

- Earnings before tax
- Reported taxes
- Reported tax rate
- Cash taxes paid
- Cash tax rate

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

If any of the following items have been selected, then these should be reported in the attached public evidence, as well as the corresponding tax impact (if relevant for the selected option):

- Group-wide net operating losses
- Non-recurring (one-time) operating losses in own operations
- Net operating losses from prior periods and/or acquired companies
- Single jurisdiction tax code (e.g., low domestic rate and maximum 10% sales abroad)
- Timing - issues outside of the two-year period reported

A private document or comment (e.g., a company's comment provided in the confidential comment box) cannot be accepted as a supporting document for the second table, unless it is verifiable in the public domain.

For all of the above:
Listed and/or publicly owned companies are required to provide links to public reports or corporate websites.
Non-listed companies are required to provide the following evidence, depending on the type of company:

- **Family-owned companies and privately owned companies** are required to provide public reports, corporate websites, or internal documents.
- **Cooperatives** are required to provide public reports, corporate websites, or internal documents.
- **State-owned companies** are required to provide tax reporting in the public domain as their key stakeholder is the general public.

Please note: Answers in the form of "Confidential additional comments" for any type of non-listed company will not be accepted.

References

- Average Effective Tax Rate & Cash Tax Rate for each of the 24 GICS® Industry Groups, please see the CSA Handbook
- Organisation for Economic Co-operation and Development (OECD) framework "Base Erosion and Profit Shifting (BEPS)"

Average Effective Tax Rate & Cash Tax Rate for each of the 24 GICS® Industry Groups

GICS® Industry Groups	Our Industries	Average Effective Tax Rate	Average Cash Tax Rate
Automobiles & Components	ATX Auto Components AUT Automobiles	15.47%	20.90%
Consumer Durables & Apparel	DHP Household Durables LEG Leisure Equipment & Products & Consumer Electronics TEX Textiles, Apparel & Luxury Goods	21.23%	19.41%
Consumer Services	CNO Casinos & Gaming CSV Diversified Consumer Services REX Restaurants & Leisure Facilities TRT Hotels, Resorts & Cruise Lines	18.60%	12.21%
Media & Entertainment	IMS Interactive Media, Services & Home Entertainment PUB Media, Movies & Entertainment	16.83%	15.48%
Consumer Discretionary Distribution & Retail	RTS Retailing	23.39%	23.75%
Consumer Staples Distribution & Retail	FDR Food & Staples Retailing	24.51%	24.72%
Food, Beverage & Tobacco	BVG Beverages FOA Food Products TOB Tobacco	21.09%	22.78%
Household & Personal Products	COS Personal Products HOU Household Products	24.11%	33.29%
Energy	COL Coal & Consumable Fuels OGR Oil & Gas Refining & Marketing OGX Oil & Gas Upstream & Integrated **OIE** Energy Equipment & Services	15.06%	9.14%
Banks	BNK Banks	21.29%	19.94%
Financial Services	FBN Diversified Financial Services and Capital Markets	19.32%	20.95%
Insurance	INS Insurance	14.97%	13.41%
Health Care Equipment & Services	MTC Health Care Equipment & Supplies	15.64%	16.38%
Pharmaceuticals, Biotechnology & Life Sciences	BTC Biotechnology DRG Pharmaceuticals LIF Life Sciences Tools & Services	7.89%	9.97%
Semiconductors & Semiconductor Equipment	SEM Semiconductors & Semiconductor Equipment	13.96%	13.82%
Software & Services	SOF Software TSV IT services	14.13%	15.26%
Technology Hardware & Equipment	CMT Communications Equipment ITC Electronic Equipment, Instruments & Components THQ Computers & Peripherals and Office Electronics	15.39%	15.09%
Materials	ALU Aluminum CHM Chemicals COM Construction Materials CTR Containers & Packaging	19.13%	20.65%

	FRP Paper & Forest Products		
	MNX Metals & Mining		
	STL Steel		
Real Estate Management & Development	REM Real Estate Management & Development	22.56%	15.47%
Telecommunication Services	TLS Telecommunication Services	17.67%	10.37%

Information Security

Over the past decade, the increasing frequency and resulting cost of information security breaches have elevated the information security discipline to a critical concern across all sectors of the economy. The most prevalent risks usually arise from technical and procedural failures, human errors, malicious attacks, adverse weather events, and natural disasters, among other factors.

Ineffective information security practices can impact the company in many ways, both internally (operational failures, loss or theft of sensitive information, fines and penalties) and externally in relation to the market (reputational damage, loss of operating licenses, disruption of third-party operations). Moreover, the increased attention of public opinion and regulators concerning the topic further demonstrates the material significance of information security, and its importance to protect and enhance company value creation.

This criterion focuses on how well companies are prepared to prevent material information security incidents from a governance, policy and program perspective, and if they are prepared to react appropriately in case of incidents.

Information Security Governance

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

All boards should have the ability to understand information security threats and assess management's capability of dealing with information security-related issues, according to the National Association of Corporate Directors (NACD). However, senior executives, like CISOs or CIOs, must also have the necessary leadership and operational and strategic skills to understand and face information security risks. An information security committee would encourage the board and executives to prioritize information security issues.

The question focuses on whether the company has the appropriate governance structure for information security risks and incidents.

Question Layout

Does the company have governance mechanisms to oversee its information security activities?

- ○ Yes, the company has governance mechanisms to oversee information security activities. Please indicate where this information is available in **public reporting or corporate website**.
  - ☐ Board level responsibility for overseeing information security issues, maintained by
    - ○ Dedicated information security committee
    - ○ Another board level committee (e.g., Risk Committee) with clear responsibility for information security
  - ☐ At least one board member with information security background
  - ☐ Executive level responsibility for overseeing information security issues, maintained by
    - ○ Chief Information Security Officer (CISO)
    - ○ Chief Technology Officer (CTO) / Chief Information Officer (CIO) or similar
    - ○ CEO / COO / CRO or similar with clear responsibility for information security

Question-Specific Guidance & Definitions

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 Experience: Relevant experience includes implementing information security or cybersecurity measures, or holding senior executive roles with oversight and direct responsibility for information security. Academic expertise in IT is not considered relevant.

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

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

Board-level committee with information security oversight: Assigned committee, formed of board members only, responsible for overseeing information security-related issues.

Executive role to oversee information security: The highest-ranking individual responsible for assessing and managing information security-related issues.

CISO: A Chief Information Security Officer (CISO) is the senior-level executive in an organization responsible for establishing and maintaining the organization's vision, strategy, and program to ensure the protection of information assets and technologies.

CIO: A Chief Information Officer (CIO) is the senior-level executive responsible for managing computer and information systems. For some companies, the CIO will also be responsible for information security. While the CIO also manages IT strategy and infrastructure, a CISO focuses only on information security.

CTO: A Chief Technology Officer (CTO) is the senior-level executive responsible for managing an organization's technology strategy and ensuring its technology infrastructure meets the company's goals. For some companies, the CTO is also responsible for information security. While the CTO also manages technology strategy and infrastructure, a CISO focuses only on information security.

Important note: *For the purpose of this question, references containing "information security", "cybersecurity" and "IT security" and similar terms are all equally accepted.*

Data Requirements

Board Oversight: Board oversight refers to a board-level committee responsible for overseeing information security-related issues. Evidence that the committee oversees information security-related issues should be available publicly. Please select the correct option.

All members must be part of the board to accept the committee as a board-level committee.

The board-level committee must be formed of supervisory board members only for two-tier boards.

Executive responsibility: Management responsibility refers to the highest management level with dedicated responsibility for managing information security-related issues. The individual should not be part of the board of directors. The best practice is to have a CISO as part of the Executive Management team or report directly to it.

For two-tier boards, management responsibility can be at the management board level.

Disclosure Requirements

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

Any response that cannot be verified in the attached public document(s) will not be accepted.

Standards & Frameworks

CSRD - GOV-1 Board Composition & Skills, GOV-1 Governance Bodies Role

Information Security Policy

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

The purpose of this question is to assess a company's commitment to managing information security risks through transparent public reporting. As the reliance on digital information grows, safeguarding data and ensuring the resilience of information systems have become critical factors in both corporate sustainability and risk management. Effective information security policies are essential to protect against cyber threats, data breaches, and system vulnerabilities, which can impact not only a company's operations but also its reputation and long-term value generation.

This question examines whether the company publicly discloses its information security policy, highlighting key commitments such as continuous investment in IT infrastructure, to ensuring data integrity and responsiveness to cybersecurity threats. Additionally, it evaluates the company's application of security requirements to third parties (e.g., suppliers).

Question Layout

Does the company have a policy on information security and is it available publicly?

- ○ Yes, the company has a policy on information security. Please indicate where this information is available in **public reporting or corporate website.**
  - ☐ Continuously improving information security systems
  - ☐ Ensuring integrity and protection of data
  - ☐ Monitoring and responding to information security threats
  - ☐ Establishing individual responsibilities for information security for the entire workforce
  - ☐ Establishing information security requirements for third parties (e.g. suppliers)

Question-Specific Guidance & Definitions

Information Security: It refers to the comprehensive measures taken to protect an information technology system from threats including malicious attacks, data loss, service disruptions, and any damage to its hardware, software, and stored data. The primary objective of information security is to mitigate information risk by ensuring the confidentiality, integrity, and availability of information.

Information Security Policy: A formal declaration of the company's commitment to implementing and maintaining standards for protecting information systems. This policy outlines the promises made regarding data protection, continuous security improvements, and adherence to cybersecurity best practices, both internally and in partnership with external stakeholders.

Continuously improving information security systems: Information security risks are not static; risks might vary and evolve depending on different circumstances, which is why continually improving the information security management system is important to protect and create value.

Ensuring integrity and protection of data: Ensuring that data remains accurate, consistent, and safeguarded from unauthorized access, tampering, or destruction. This involves maintaining security controls that protect data throughout its lifecycle, including measures to prevent breaches and ensure that only authorized users can modify or access sensitive information.

Monitoring and responding to information security threats: Actively monitoring cybersecurity risks, responding to incidents promptly, and implementing mitigation strategies. This includes maintaining

transparency with affected stakeholders when breaches or threats occur, outlining actions taken to address vulnerabilities and prevent future risks.

Establishing individual responsibilities for the entire workforce: The establishment of responsibilities for the entire workforce pertaining to information security. All employees are expected to have varying degrees of responsibility for information security, even if their responsibilities consist only in flagging suspicious activities. If the company's information security guidelines are applicable to the entire workforce, and are accompanied by defined actions, this would be acceptable since the entire workforce would need to follow them.

Establishing information security requirements for third parties (e.g., suppliers): The establishment of information security requirements for third parties, which list the security policies that they are expected to comply with to work with the company. This approach aims to mitigate risks associated with external relationships and safeguard shared infrastructures and data.

Important note: *For the purpose of this question, references containing "information security", "cybersecurity" and "IT security" and similar terms are all equally accepted.*

Disclosure Requirements

- Disclosure requirements for public questions: Companies are expected to provide relevant publicly available evidence to support their claims.
- Please note that the assessment expectations require evidence of the existence of the listed documents/processes. Reports containing sensitive information are not required for the options to be accepted.

References

ISO/IEC 27001:2022 Information security, cybersecurity and privacy protection — Information security management systems — Requirements

Standards & Frameworks

CSRD - Policies

Information Security Management Programs

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

The information security threat landscape continues to grow and evolve, leveraging new and existing technologies to exploit vulnerabilities.

Given the importance of technical and procedural capabilities in safeguarding systems and critical information, as well as responding to information security threats, companies across all sectors are encouraged to establish robust management programs to test and protect their information systems.

These should include business continuity plans, vulnerability testing, internal and external audits and correct employees' behaviors, which are critical to ensuring companies' long-term sustainability.

This question examines whether companies are prepared to prevent and respond to significant information security incidents from a programmatic standpoint, as well as the public availability of information regarding these practices. It also assesses whether companies have experienced any material information security incidents in the most recent financial year.

Question Layout

Does the company have programs on information security management?

- Yes, the company has programs on information security management. Please indicate where this information is available in **public reporting or corporate website.**
  - ☐ Information security-related business continuity plans
  - ☐ Information security vulnerability analysis
  - ☐ Escalation process for employees to report incidents, vulnerabilities or suspicious activities
  - ☐ Disclosure of total number of breaches occurred in last FY:
  - ☐ Information security awareness training
  - ☐ Internal audits of the IT infrastructure and/or information security management systems
  - ☐ Independent external audit of the IT infrastructure and/or information security management systems: please provide the names and standards used (such as ISO 27001):

Question-Specific Guidance & Definitions

Information security: Refers to the comprehensive measures taken to protect an information technology system from threats including malicious attacks, data loss, service disruptions, and any damage to its hardware, software, and stored data. The primary objective of information security is to mitigate information risk by ensuring the confidentiality, integrity, and availability of information.

Information security management systems: Governance and control mechanisms in place to safeguard information security.

Information Technology Infrastructure: Refers to the operational aspects of technology, covering both physical and software components.

Business continuity plans (BCP): A set of procedures to prevent potential threats, limit damages (contingency) and recover systems when they occur.

Vulnerability analysis: The analysis that a company conducts for defining, identifying, classifying, and prioritizing vulnerabilities in computer systems, applications, and network infrastructures. This provides the organization doing the assessment with the necessary knowledge, awareness and risk background to understand the threats to its environment and react appropriately. It is commonly included in internal and external audit processes, together with other procedures such as penetration testing, simulated hacker attacks and similar.

Data breach: Occurs when unauthorized parties access confidential and/or sensitive information of company's stakeholders and the overall organization.

Important note: *For the purpose of this question, references containing "information security", "cybersecurity" and "IT security" and similar terms are all equally accepted.*

Data Requirements

- If a company selects that yes, it has an information security management program in place but does not select any of the subsequent options, then the answer will not be accepted.
- Independent external audits/certifications which are expired at the time of the assessment are not considered valid to accept the related option.
- The escalation process for employees to report incidents, vulnerabilities or suspicious activities should direct them to the legal and compliance department, IT department or other similar internal stakeholders.
- Please note that the option "Information security awareness training" refers to training activities delivered to employees.

Disclosure Requirements

The information provided must be available in public reporting (e.g., strategy or risk section of an annual report, sustainability report, integrated report, or other company publications), or in a dedicated section (e.g., information security documents) of the corporate website.

Standards & Frameworks

CSRD - GOV-1 Governance Bodies Role, Key Actions, Metrics, SBM-3 Material Impacts Risks & Opportunities

Responsible Artificial Intelligence

Despite the enormous potential of Artificial Intelligence (AI) systems to enhance productivity and boost the economy, these technologies also have the potential to produce important societal changes and to impact the environment. Given the rapid development of AI applications, numerous governments and international bodies have directed their efforts toward producing various initiatives that promote the responsible development and use of AI. These initiatives include market regulations, codes of conduct, risk-based mitigation approaches, regulatory frameworks and the creation of ad-hoc entities with the objective of supervising, testing and maintaining oversight over the topic.

Businesses implement different AI applications both for their own uses and for market purposes and the impacts on the environment and society will likely increase, suggesting the need to implement solid AI governance structures and measures to mitigate the associated risks. Some of the key challenges businesses and authorities will have to deal with include managing data privacy and copyright protection, addressing ethical concerns (bias and discrimination), limiting misuse, and guaranteeing transparency and explainability of complex algorithms.

Further, in today's tech-driven economy, companies that strategically invest in AI enhance their competitiveness by improving innovation and operational efficiency. Moreover, effective AI utilization not only reduces costs but can also support sustainability efforts, aligning with broader societal goals for environmental stewardship.

Responsible Artificial Intelligence Policy

Public: this question requires publicly available information

Assessment Focus

Applicable Industries

All

Change from Last Year

Newly introduced in 2026

Question Rationale

Businesses are increasingly developing and deploying artificial intelligence (AI) systems across a wide range of applications, from supply chain optimization and operational efficiency to customer experience enhancement and predictive analytics. While AI offers significant opportunities for innovation and value creation, it also introduces complex risks that require careful oversight, such as bias, lack of transparency, privacy concerns and unintended societal impacts. To address these challenges, companies need robust governance frameworks that ensure AI systems are implemented and used responsibly. Such frameworks should not only mitigate risks but also foster trust among stakeholders, and align with emerging regulatory and ethical standards.

The purpose of this question is to assess the extent to which companies have established formal governance mechanisms for AI. It examines whether companies have adopted a policy or commitment that articulates principles for the responsible use of AI. This includes multiple aspects, which are expected to be included in the document to evaluate the quality of the policy/commitment. Additionally, the question seeks to determine whether the policy or commitment has been formally endorsed by the board of directors or executive management.

Question Layout

Does the company have a policy on responsible artificial intelligence and is it available publicly?

- Yes, the company has a policy on responsible artificial intelligence and it includes at least one of the following aspects. Please indicate where this information is available in **public reporting or corporate website.**

Policy aspects

The policy covers the following aspects:

- ☐ Respecting data privacy in the use and/or development of AI
- ☐ Protecting the cybersecurity of systems in the use and/or development of AI
- ☐ Avoiding potential bias in the use and/or development of AI
- ☐ Keeping humans "in the loop" for critical decisions and allowing human intervention
- ☐ Ensuring transparency of AI systems and explainability of AI generated results/decisions
- ☐ Establishing clear accountability for outcomes produced by AI models/tools
- ☐ Defining clear boundaries for what the AI can and cannot do
- ☐ Requiring (own/third-party) AI data centers/models to have a low ecological footprint
- ☐ Not using/deploying AI systems that engage in manipulative behavior, exploitation of vulnerabilities, social scoring or unauthorized biometric surveillance (i.e. prohibited systems as per EU AI Act)

Policy endorsement

- ☐ Please select the highest endorsing decision-making body:
  - Board of directors
  - Executive management

Question-Specific Guidance & Definitions

Respecting data privacy in the use and/or development of AI: Designing, developing, and operating AI systems to safeguard personal data throughout the lifecycle of AI development and deployment. That includes complying with applicable data protection laws.

Protecting the cybersecurity of systems in the use and/or development of AI: Robust security measures to prevent cyberattacks. This could be penetration testing, incident response, encryption and secure coding practices. Mechanisms to prevent harmful or inappropriate content, such as a prompt shield, may also be included.

Avoiding potential bias in the use and/or development of AI: AI design that ensures fair and non-discriminatory behavior. It includes identifying and mitigating biases in data training, conducting bias audits, and ensuring the creation of diverse and representative datasets.

Keeping humans "in the loop" for critical decisions and allowing human intervention: Human-in-the-loop (HITL) ensures that critical decisions influenced by AI include effective, documented human oversight, with authority and ability to intervene, override, or escalate. Oversight can range from human-in-command (final authority), to human-on-the-loop (monitoring), to human-in-the-loop (approval required). The system must ensure that AI systems cannot make irreversible or high-stakes decisions without human oversight and mechanisms for human review or override.

Ensuring transparency of AI systems and explainability of AI generated results/decisions: Transparency entails clear disclosures of AI use, capabilities, limitations, data sources, and risks; explainability involves providing an understandable rationale for outputs appropriate to stakeholders' needs. It should be clear to the user when they interact with AI rather than a human.

Establishing clear accountability for outcomes produced by AI models/tools: Accountability requires named roles responsible for AI outcomes, risk decisions, and compliance. There should also be a process for investigating and addressing errors or harm caused by AI and legal accountability for decisions influenced by AI.

Defining clear boundaries for what the AI can and cannot do: Boundaries define the authorized scope, capabilities, and limitations of AI systems to prevent misuse, mission creep, or unintended application; they translate into allowed use policies, guardrails, capability restrictions, and control points for escalation. Safeguards are necessary to prevent AI from operating outside its intended scope.

Requiring (own/third-party) AI data centers/models to have a low ecological footprint: AI demand growth and emerging sustainability risks for data center energy. A low ecological footprint requires measuring and reducing energy use, water use, and carbon intensity. It should include promotion of optimization techniques to reduce computational load and energy waste and mandate energy-efficient infrastructure and encourage renewable energy use.

Not use/deploy AI systems that engage in manipulative behavior, exploitation of vulnerabilities, social scoring or unauthorized biometric surveillance (i.e. prohibited systems as per EU AI Act): AI that uses subliminal, purposefully manipulative, or deceptive techniques to materially distort a person's behavior. AI systems that exploit vulnerabilities due to age, disability, or specific socioeconomic situations to materially distort behavior. AI used to evaluate or classify the trustworthiness of individuals over time based on social behavior or personal traits, leading to detrimental treatment in unrelated

contexts or disproportionate/unjustified outcomes. Real-time remote biometric identification (RBI) systems.

Data Requirements

This question is applicable to all industries assigned to this question. It may only be marked "the question is not applicable to the company" in case of public evidence that the company is not using or deploying any AI systems or models.

Disclosure Requirements

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

This question requires a formal approach to fulfilling the element and cannot be referenced to a program or initiatives. Therefore, all evidence must be either part of a policy or a commitment.
Any response that cannot be verified in the attached public document(s) will not be accepted.

References

OECD AI Principles:
https://www.oecd.org/en/topics/ai-principles.html
UN Recommendation on the Ethics of Artificial Intelligence:
https://unesdoc.unesco.org/ark:/48223/pf0000381137
EU AI Act:
https://digital-strategy.ec.europa.eu/en/policies/regulatory-framework-ai

Standards & Frameworks

CSRD - G1-1 Policies

Responsible Artificial Intelligence Program

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

Newly introduced in 2026

Applicable Industries

All

Question Rationale

As AI technologies become increasingly integrated into everyday life, their impact on society and the environment is profound. This development has spurred governments, institutions and companies to investigate and set forth guidelines on the responsible use and development of AI technologies to mitigate risks and negative impacts on society and the environment. Responsible AI deployment is essential to ensure that these technologies do not perpetuate biases, invade privacy, or result in harmful outcomes. By inquiring about a company's responsible AI program, this question emphasizes the importance of ethical and environmental considerations in technology development and deployment, fostering a culture of accountability and transparency

Question Layout

Does the company have programs on responsible artificial intelligence?

- Yes, the company has programs on responsible artificial intelligence. Please indicate where this information is available in **public reporting or corporate website.**

  The responsible artificial intelligence program contains the following elements:
  - ☐ Limiting access to sensitive AI capabilities (e.g. facial recognition, surveillance)
  - ☐ Distinct labeling of AI-generated content and outcomes of AI-driven decisions
  - ☐ Mechanisms to detect and correct drift or degradation of AI models over time
  - ☐ Regular assessments of deployed AI models for fairness/bias
  - ☐ Initiatives (own/with suppliers) to lower the ecological footprint of AI data centers/models
  - ☐ Appeals process for users/affected third parties to contest an AI decision or outcome
  - ☐ Quantification of the impact of AI initiatives/tools on sustainability outcomes
  - ☐ Training of employees on the ethical use and/or security of AI

  The company conducts the following verification:
  - ☐ The AI management system is externally verified (e.g. ISO42001)

Question-Specific Guidance & Definitions

Limiting access to sensitive AI capabilities (e.g. facial recognition, surveillance): This measure involves implementing strict access controls to sensitive AI technologies that could pose ethical or privacy concerns. Limiting access ensures that only authorized personnel can use such capabilities, thereby reducing the risk of misuse or abuse. This also includes establishing guidelines on who can deploy these technologies, under what circumstances, and with what oversight, to protect individuals' rights and maintain public trust.

Distinct labeling of AI-generated content and outcomes of AI-driven decisions: This practice requires that any content generated by AI systems, such as text, images, or decisions, is clearly labeled as such. This transparency helps users distinguish between human-created and AI-generated content, fostering trust and accountability. It also informs users about the nature of the information they are consuming or the decisions affecting them, enabling them to make more informed choices. It also covers informing users pro-actively that they are interacting with an AI system as opposed to human interaction.

Mechanisms to detect and correct drift or degradation of AI models over time: AI models can become less effective over time due to changes in data patterns or external conditions—a phenomenon known as model drift. Implementing mechanisms to monitor model performance continuously allows organizations to detect when a model's accuracy declines. Corrective actions can then be taken, such as retraining the model with new data or adjusting its parameters, ensuring that the AI system remains reliable and relevant.

Regular assessments of deployed AI models for fairness/bias: This measure involves conducting systematic evaluations of AI models to identify and mitigate any biases that may affect their decisions or outcomes. Regular assessments can include audits, bias testing, and fairness evaluations to ensure that the models treat all demographic groups equitably. This process is essential for maintaining ethical standards and ensuring that AI systems do not perpetuate existing inequalities or create new forms of discrimination.

Initiatives (own/with suppliers) to lower the ecological footprint of AI data centers/models: This measure focuses on reducing the environmental impact of AI operations, particularly in data centers where AI models are trained and deployed. It may involve adopting energy-efficient hardware, optimizing algorithms for lower energy consumption, and using renewable energy sources. By addressing the ecological footprint, organizations can contribute to broader sustainability goals.

Appeals process for users/affected third parties to contest an AI decision or outcome: Establishing a transparent appeals process allows individuals or entities affected by AI-driven decisions to challenge those outcomes. This process should be accessible, fair, and responsive, providing users with clear pathways to seek redress or clarification. It ensures accountability in AI systems and empowers users by giving them a voice in the decision-making process, which is vital for maintaining trust in AI technologies.

Quantification of the impact of AI initiatives/tools on sustainability outcomes: This measure involves systematically measuring and reporting the effects of AI initiatives on sustainability goals, such as carbon emissions reduction, resource efficiency, or social impacts. Quantification can include metrics and key performance indicators (KPIs) that help organizations understand how their AI tools contribute to environmental and social outcomes. This data-driven approach supports informed decision-making and demonstrates accountability to stakeholders.

Training of employees on the ethical use and/or security of AI: Providing training programs for employees on ethical AI use and security practices is crucial for fostering a culture of responsibility within the organization. Training can cover topics such as bias awareness, data privacy, ethical implications of AI decisions, and security measures to protect AI systems from vulnerabilities. Well-informed employees are better equipped to make ethical decisions and uphold the organization's responsible AI standards.

The AI management system is externally verified (e.g. ISO42001): External verification of an AI management system involves third-party assessment and certification to ensure that the system meets established standards for responsible AI practices. For instance, ISO 42001 is a standard that provides guidelines for managing AI systems effectively and ethically. External verification enhances credibility, demonstrates commitment to responsible AI, and assures stakeholders that the organization adheres to best practices and regulatory requirements.

Data Requirements

This question is applicable to all industries assigned to this question. It may only be marked "the question is not applicable to the company" in case of public evidence that the company is not using or deploying any AI systems or models. This includes any type of AI usage and it includes all types of AI systems, regardless of whether they are third-party or not.

Disclosure Requirements

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

This question requires references to implemented programs or initiatives. Therefore, evidence related to policies or commitments are not acceptable.

Any response that cannot be verified in the attached public document(s) will not be accepted.

References

OECD AI Principles:
https://www.oecd.org/en/topics/ai-principles.html

UN Recommendation on the Ethics of Artificial Intelligence:
https://unesdoc.unesco.org/ark:/48223/pf0000381137

EU AI Act:
https://digital-strategy.ec.europa.eu/en/policies/regulatory-framework-ai

Environmental Dimension

Environmental Policy & Management

Environmental Management System (EMS) refers to the management of an organization's environmental programs in a comprehensive, systematic, planned and documented manner. It includes the organizational structure, planning and resources to develop them, and the procedure for the implementation and management of the company's policy on environmental resource management. Companies that have adopted an EMS as a management tool are more likely to improve their environmental performance in a cost-effective way and to reduce the risk of incurring fines or penalties for not complying with environmental legislation.

Environmental Policy

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

AIR, ALU, ARO, ATX, AUT, BLD, BTC, BVG, CHM, CMT, CNO, COL, COM, CON, COS, CSV, CTR, DHP, DRG, ELC, ELQ, FDR, FOA, FRP, GAS, HEA, HOM, HOU, ICS, IDD, IEQ, IMS, ITC, LEG, LIF, MNX, MTC, MUW, OGR, OGX, **OIE**, PIP, PRO, PUB, REI, REM, REX, RTS, SEM, SOF, STL, TCD, TEX, THQ, TLS, TOB, TRA, TRT, TSV

Question Rationale

A company's Environmental Management Systems (EMSs) is an important indicator of a company’s preparedness and commitment to measure and reduce the environmental impact of its operations. Companies that adopt an environmental policy as a management tool are more likely to improve environmental performance in a structured and systematic way.

This question identifies the critical elements that are defined in the group-wide, public environmental policy. It also determines the scope of the policy and the highest level or endorsement.

Question Layout

Does the company have a group-wide environmental policy and is it available publicly?

- Yes, the company has a group-wide environmental policy. Please indicate where this information is available in **public reporting or corporate website.**

  Policy aspects

  The policy covers the following aspects:

  - ☐ Establishing clear accountability for policy implementation
  - ☐ Ensuring continuous improvement of environmental performance
  - ☐ Setting targets and objectives to reduce environmental impacts
  - ☐ Consulting external stakeholders in the development or implementation of the environmental policy
  - ☐ Providing training for employees to understand the impacts of the company on the environment

  Scope of policy

  Which parts of operations, corporate processes and supply chain are covered by the environmental policy?

  - ☐ Own operations
  - ☐ Suppliers
  - ☐ Partners

  Policy endorsement

  - ☐ Please select the highest endorsing decision-making body:
    - Board of directors
    - Executive management

Question-Specific Guidance & Definitions

Environmental Management System (EMS): Management of an organization's environmental programs in a comprehensive, systematic, planned, and documented manner. It includes the organizational structure, planning and resources to develop them, and the procedure for the implementation and management of the company's policy on environmental management.

Environmental policy: Group-wide, public policy that describes the intentions and directions related to environmental impacts and performance defined by top management.

Endorsement and oversight: A statement that the policy or commitment is approved, overseen, reviewed, or adopted by the board of directors or executive management. A policy can also be signed by the respective director.

Own operations: Own employees, own business, subsidiaries, own products and services, business units, regions, sites, plants, facilities.

Suppliers: Include brokers, consultants, contractors, distributors, franchisees or licensees, home workers, independent contractors, manufacturers, primary producers, sub-contractors, tier-1 and 2 and wholesalers.

Partners: Include agents, lobbyists and other intermediaries, joint venture and consortia partners, targets of mergers and acquisitions, customers, clients.

Disclosure Requirements

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

Any response that cannot be verified in the attached public document(s) will not be accepted.

The documentation is not acceptable as policy if it is not on corporate level (i.e., one site or business unit) and/or:

- unspecific and scattered pieces of information
- information on a (pilot) project
- a case study
- information reported in GRI table or similar

Standards & Frameworks

CDP - 4.1.1, 4.6, 4.6.1

SFDR - M - UNGC and OECD Compliance Mechanisms

TNFD - Governance A., Strategy B.

UNGC - G1, G2, G3, G3.1, E1, E1.1

Environmental Management Systems Verification

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

AIR, ALU, ARO, ATX, AUT, BLD, BTC, BVG, CHM, CMT, CNO, COL, COM, CON, COS, CSV, CTR, DHP, DRG, ELC, ELQ, FDR, FOA, FRP, GAS, HEA, HOM, HOU, ICS, IDD, IEQ, IMS, ITC, LEG, LIF, MNX, MTC, MUW, OGR, OGX, **OIE**, PIP, PRO, PUB, REI, REM, REX, RTS, SEM, SOF, STL, TCD, TEX, THQ, TLS, TOB, TRA, TRT, TSV

Question Rationale

A verified/audited environmental management system (EMS) reflects a company's commitment towards monitoring environmental data. Further, the verification process can facilitate improvements to a company's EMS, improving efficiency and coverage. Our question on audit verification focuses on identifying whether the company has implemented, verified and certified its EMS to ensure the credibility of its procedures and systems.

Question Layout

Does the company publicly report on whether its Environmental Management System (EMS) is certified, audited, or verified?

- Yes, the company publicly reports that its Environmental Management System (EMS) is certified, audited, or verified. Please indicate where this information is available in **public reporting or corporate website**.

  Please indicate what the coverage figures below are based on (e.g., percentage of group-wide operations, group-wide revenues, group-wide production sites, total employees, etc.):

Aspects	Coverage (Percentage)	Supporting evidence
☐ **EMS is verified through international standards** (e.g. ISO 14001, JIS Q 14001, EMAS certification). Please specify:		
☐ **Third party certification / audit / verification by specialized companies.** Please specify:		
☐ **Internal certification / audit / verification by company's own specialists from headquarters.** Please specify:		
Total (should not exceed 100%)		

Data Requirements

Please note that the total coverage for all three alternatives should not exceed 100% - To avoid double-counting, for the parts of your operations with multiple certifications/types of verification, only mark one of the three options: indicating the coverage of international standards first, followed by third-party verification and then internal verification.

Coverage should be relative to global operations and not only a single subsidiary, region or site.

Please also note that verification only pertains to your EMS, not the verification of environmental data or reporting.

NOTE:

- We accept RC 14001 for marking - EMS verified through international standards
- We do not accept ISO 50001, LEED or ISO 14064 or any other certification of energy or GHG management or product specific verification/certification.

Disclosure Requirements

Supporting evidence:

- This question requires supporting evidence from the public domain. The information provided must be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications) or corporate website.
- Any response that cannot be verified in the attached public document(s) will not be accepted.

Standards & Frameworks

TNFD - Metrics and Targets B.

Energy

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

Energy Management Programs

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

AIR, ALU, ARO, ATX, AUT, BLD, BTC, BVG, CHM, CMT, CNO, COL, COM, CON, COS, CSV, CTR, DHP, DRG, ELC, ELQ, FDR, FOA, FRP, GAS, HEA, HOM, HOU, ICS, IDD, IEQ, IMS, ITC, LEG, LIF, MNX, MTC, MUW, OGR, OGX, **OIE**, PIP, PUB, REI, REM, REX, RTS, SEM, SOF, STL, TCD, TEX, THQ, TLS, TOB, TRA, TRT, TSV

Question Rationale

By integrating energy management programs into business practice, companies can establish a robust process to continually improve energy performance. Energy performance is a concept related to energy efficiency and use. By improving energy performance and associated energy costs, companies can improve their competitiveness. In addition, improving energy performance can lead to climate change mitigation goals by reducing greenhouse gas emissions.

The successful implementation of energy management programs supports a culture of energy performance improvement that requires a commitment from all levels of the organization, especially top management. This involves cultural changes within the entire organization.

This question assesses the set of actions that ensure a robust, credible and reliable energy management program aimed at reducing energy consumption within a company's own operations. Each option should relate to the business activities within a company's direct control and may include activities such as production, extraction, manufacturing, management, etc. It aims to provide a systematic, data-driven and facts-based process, focused on continually improving energy performance that can transform the way companies manage energy use and energy consumption.

Question Layout

Does the company have programs on energy management?

- Yes, the company has energy management programs that cover the following elements. Please indicate where this information is available in **public reporting or corporate website.**
  - ☐ Energy audits to identify opportunities for improving energy performance
  - ☐ Quantified targets to address energy savings
  - ☐ Actions to reduce the amount of energy use
  - ☐ Evaluation of progress in reducing energy consumption

- ☐ Use of clean or green energy
- ☐ Investments in innovation or research and development to decrease energy consumption
- ☐ Energy efficiency training provided to employees to raise awareness of energy consumption reduction

Question-Specific Guidance & Definitions

Energy audits: Process that analyzes energy efficiency and consumption based on data and evidence. This process allows firms to determine areas of significant energy use and identify opportunities for improving energy performance.

Quantified targets: Objectives with specific, measurable and quantifiable energy performance improvement targets to reduce the company's energy consumption (e.g., reduce electricity consumption by 3% by the end of the year, 2% plant efficiency improvement by the fourth quarter). Although emissions reduction targets result from energy efficiency measures, this question solely covers energy consumption reduction targets.

Actions to reduce the amount of energy used: Concrete and targeted actions focused on reducing energy consumption. These can include the modification or renovation of facilities (e.g., warehouses, factories, offices), equipment (e.g., engines, boilers), systems (e.g., lighting, steam, transport) and energy-using processes. They can also include qualitative objectives related to people energy behavior, cultural change or operation of the systems and equipment responsible for substantial energy consumption.

Evaluation of progress in reducing energy consumption: Comparison of performance before and after the implementation of action plans.

Clean energy: The type of energy that does not release pollutants into the air.

Green energy: Resources that come from natural sources, such as the sun. Renewable energies are both clean and green energy since they come from sources that are constantly being replenished, such as hydropower, wind power or solar energy. Although these measures do not necessarily represent an energy performance improvement, the consumption of renewable energy has positive environmental effects, hence off-site renewable energy is accepted.

Innovation or research and development to decrease energy consumption: Procedures that consider improvement opportunities, operational control and energy performance in the design of new, modified and renovated facilities, equipment, systems, and energy-using processes in the scope and boundaries of the company. These procedures also consider on-site renewable energy production and less-polluting types of energy options for new facilities, as well as improved technologies and techniques.

Energy efficiency training: Training focused on raising awareness within the company's personnel to optimize energy behavior and lead to a culture that aims to reduce energy consumption.

Data Requirements

This question assesses management programs, so every option acceptable should be in the context of the company's management measures and programs. No option should be accepted based on policy-related information.

For companies operating in the **Energy & Utilities** sectors – the question requires to check energy consumption/reduction in its own operations and not energy generation for further sale.

Please provide public evidence for measures and programs in which the company has already invested previously or are under development. Hence, future investments without detailed explanation should not be accepted.

Disclosure Requirements

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

Any response that cannot be verified in the attached public document(s) will not be accepted.

References

ISO 50001: Energy Management Systems

Standards & Frameworks

UNGC - G7, E3, E3.1, E8, E9

Energy Consumption

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

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

In the last century, there has been an unprecedented increase in the use of natural resources and materials. Producing more with fewer material is essential for many industries affected by the increasing scarcity of natural resources. Resource efficiency and circularity can enhance companies' competitiveness through reduced costs and environmental liabilities. It can also prepare companies for future environmental regulations. In this question, we will review total non-renewable and renewable energy consumption, assessing the overall trend of consumption, as well as the target set for the current financial year.

Question Layout

Does the company track its energy consumption?

○ Yes, the company tracks its energy consumption. Please indicate where this information is available.

Energy consumption	Unit	FY 2022	FY 2023	FY 2024	FY 2025	Target for FY 2025
Total non-renewable energy consumption	MWh					
Total renewable energy consumption	MWh					
Coverage (as a percentage of denominator)	percentage of:					

☐ The data is publicly available.
☐ The data has been third-party verified.
☐ The data is normalized.
☐ The data differs from its publicly reported figures. Please provide an explanation:

☐ The coverage is temporarily reduced due to corporate actions. Please provide an explanation:

Question-Specific Guidance & Definitions

Total non-renewable energy consumption: This is the sum of the non-renewable consumption of fuel (excluding feedstocks), the consumption of non-renewable purchased or acquired electricity, and the consumption of non-renewable purchased or acquired heat, steam and cooling.

Total renewable energy consumption: This is the sum of the consumption of renewable fuel (excluding feedstocks), the consumption of renewable purchased or acquired electricity, the consumption of renewable purchased or acquired heat, steam and cooling, and the consumption of self-generated non-fuel renewable energy.

Renewable energy: This is energy taken from sources that are inexhaustible, such as wind, solar, hydropower, geothermal, biomass and marine (tidal and wave energy), as defined by the GHG Protocol. Please note that hydrogen should not be included if it is derived from fossil fuels. Similarly, waste energy should not be included if it is derived from fossil fuels.

Non-renewable energy: This is the energy from sources such as coal, oil and natural gas, that is not derived from renewable sources. Please note that blended fuels from both renewable and non-renewable

sources should be split by the proportion contained from each source. Nuclear energy is not considered as renewable and should be reported under total non-renewable energy. Please note that direct consumption of nuclear fuel should not be included. Fuels, excluding nuclear, should be covered, including fleet fuel. The consumption of purchased or acquired electricity, steam heat, and/or cooling from nuclear sources should be included.

Self-generated non-fuel renewable energy: If your organization produces renewable energy that is not based on fuel, such as solar, wind, hydro, geothermal or marine, any consumption of this energy should be entered under total renewable energy. All forms of non-fuel renewable energy, electricity, heat, steam or cooling should be included under total renewable energy.

Excluding feedstocks: Fuels consumed as feedstocks are those that are not combusted for energy purposes. All fuel consumed for energy purposes inside the organizational boundary should be included, regardless of whether the fuel was purchased or produced by the organization. If a fuel is consumed as a feedstock to produce another fuel, then the feedstock should not be included, but the combustion of the produced fuel should be included. Ultimately, if a fuel is combusted, i.e., consumed for energy purposes and not as a feedstock, then it should be included. For example, naphtha and ethane are feedstocks that may be converted into petrochemical products such as ethylene, and should not be included. The steel industry is a special case because coke and fuel injectants consumed at the blast furnace serve as feedstocks and an energy source. These fuels, such as coke being used as a reducing agent, are considered feedstocks and should not be counted. However, all fuels consumed or combusted for energy that are derived from fuel feedstocks such as blast furnace gas should be counted.

This table is for gross energy consumption data only. You should not provide net consumption nor deduct for energy produced or exported from the organizational boundary. Because feedstock fuels are excluded from this question, this approach should not lead to double counting. Companies shall use the total, or gross, electricity purchases from the grid rather than grid purchases net of generation for the Scope 2 calculation. A company's total energy consumption would therefore include self-generated energy (any emissions reflected in Scope 1) and total electricity purchased from the grid. This excludes generation sold back to the grid.

Purchased or acquired electricity, steam, heat, cooling:

- This includes the consumed electricity, heat, steam, and/or cooling that was purchased or acquired, i.e., brought into the organizational boundary. This excludes the consumption of electricity, heat, steam or cooling that was produced by the organization or inside the organizational boundary. It also excludes purchased or acquired electricity, heat, steam or cooling that is not consumed inside the organizational boundary. Purchased or acquired electricity, heat, steam or cooling that is wasted should still be counted as consumption.
- Purchased or acquired electricity, steam, heat, and cooling are aligned with the boundary for Scope 2 emissions. The consumption of fuel, excluding feedstocks, should be entered if the fuel was consumed inside your organizational boundary in the last fiscal year and is aligned with the boundary for Scope 1 emissions. Therefore, in this question, we would like to assess your energy consumption for Scope 1 and Scope 2.
- Specific information on these energy carriers can be found in Section 5.3.1 and Appendix A of the GHG Protocol Scope 2 Guidance.
- The terms "purchased" and "acquired" are used when your organization has received the energy from a third party. This rules out energy that is sourced from within the organizational boundary. It should be noted that purchased or acquired heat does not include the heat content, or calorific value, of fuels that are purchased or acquired by the organization. This is accounted for at the point of fuel consumption, which falls inside the Scope 1 boundary. You should also be aware that steam, heat or cooling received directly as "waste" from a third party's industrial processes should still be accounted for if it is consumed.
- If your organization produces renewable energy that is not based on fuel, such as solar, wind, hydro, geothermal or marine, this energy consumption should be included in the total renewable energy consumption. The consumption of renewable fuels, such as solid and liquid biofuels and biogas, should also be included. All forms of nonfuel renewable energy, such as electricity, heat, steam or cooling, should be included under non-renewable energy.

Leased assets: Guidance for how to handle leased assets and spaces can be found on page 36 of the GHG Scope 2 Protocol, (5.2.1).

Renewable energy credits (RECs): These should be represented in megawatt-hours under renewable sources. RECs, RECs from power purchase agreements, energy attribute certificates, contractual instruments, tradable instruments for global renewables and unbundled certificates should be represented in megawatt-hours under renewable sources.

Units and conversion:

- The most common unit for electricity is the watt-hour. 1 million Wh equals to 1 GWh, or 1,000 kWh.
- If your raw data is in energy units other than megawatt-hours, such as gigajoules (GJ) or British thermal units, you should convert to your data to megawatt-hours. For example, since 1 GJ = 0.277778 MWh, if your data is in gigajoules, you should multiply your data by 0.277778. If your data is in millions of British thermal units, you need to multiply your data by 0.29307.
- Conversion factors from other energy units are available from a variety of online calculation tools, including from the International Energy Agency and OnlineConversion.com, or from conversion tables such as the Environmental Protection Agency's AP-42 (Appendix A).
- If your raw data is represented by units of volume such as cubic feet or gallons, or units of mass such as such as kilograms or pounds, you should convert it to units of energy using factors for fuel heating/calorific values. These are available from numerous sources, some of which are listed below:
  Intergovernmental Panel on Climate Change Guidelines for National GHG Inventories (Volume 2, Table 1.2, p1.18-1.19)

EPA AP-42 (Annex A)
International Energy Agency Statistics Manual (Annex 3, p180-183)
American Petroleum Institute Compendium (Table 3-8, p3.20-3.21)

- If your raw data for steam is in physical units such as pounds or kilograms, you should convert it to units of energy. The energy content of steam varies with temperature and pressure. Organizations can refer to The Climate Registry's General Reporting Protocol, Chapter 15, section 15.2, step 1, which explains how to calculate the energy content of steam.
- Cooling is frequently purchased in refrigeration-ton hours; 1 ton-hour is equal to 12,000 Btu, or 0.003516 MWh.

Data Requirements

For each row in the table, it is mandatory that the values provided are in the same unit.

Please ensure that the "Company Information" section at the beginning of the questionnaire has been correctly filled, and that the coverage in the table is related to the denominator relevant for the company as indicated in that section.

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

Please note: In case the company has reported a value of zero in the table, third-party verification or supporting evidence is required (e.g., comprehensive comment, internal documentation or public reporting) to substantiate the zero reported.

Please note: In cases where the company is classified within the **banks (BNK), financial services (FBN), insurance (INS) or professional services (PRO)** industries, the score obtained in this question will not contribute to the final score of the company.

Disclosure Requirements

For this question, we encourage you to provide evidence that is publicly available. Additional credit may be granted for publicly available evidence.

Disclosure Requirements for Partially Public Questions: Additional credit will be granted for relevant publicly available evidence covering the following aspect of this question:

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

Standards & Frameworks

CDP 2025 - 7.52, 7.30.1
SFDR – Energy Consumption
UNGC – E3.1, E3.1.1

Waste & Pollutants

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

Waste Management Programs

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

AIR, ALU, ARO, ATX, AUT, BLD, BTC, BVG, CHM, CMT, CNO, COL, COM, COS, CSV, CTR, DHP, DRG, ELC, ELQ, FDR, FOA, FRP, GAS, HEA, HOU, ICS, IDD, IEQ, IMS, ITC, LEG, LIF, MNX, MTC, MUW, OGR, OGX, **OIE**, PIP, PUB, REX, RTS, SEM, SOF, STL, TCD, TEX, THQ, TLS, TOB, TRA, TRT, TSV

Question Rationale

This question assesses how companies are responsibly managing waste within their operations. Adopting waste reduction programs is critical to improving operational performance and reducing environmental and social impacts. Ideally, businesses should look to close the loop by reusing, recycling, recovering and diverting waste, preventing it from entering the landfill and seeking new advantageous business opportunities. The benefits from investing in resources and programs that address waste include decreased costs, reduced risks and improved reputation.

Waste management programs can be specific to the operational business model of a company, and could be related to any of the following: solid, liquid, organic, hazardous, non-hazardous, industrial, mineral, electronic, etc.

Question Layout

Does the company have programs on waste management?

- Yes, the company has programs on waste management. Please indicate where this information is available in **public reporting or corporate website.**
  - ☐ Waste audits to identify opportunities for improving waste performance
  - ☐ Action plans to reduce waste generation
  - ☐ Quantified targets to minimize waste
  - ☐ Investment in innovation or R&D to minimize waste
  - ☐ Waste reduction training provided to employees
  - ☐ Integration of recycling programs to reduce the waste from own operations sent to landfill
  - ☐ Waste diversion from landfill is certified by an independent accredited body

Question-Specific Guidance & Definitions

Operations: This refers to any business activity within a company's direct control and includes activities such as production, extraction, manufacturing and management. Operations also refers to companies operating solely in office buildings.

Waste audits: Also called waste assessments, this is the process of identifying the amount and type of waste being generated by a company's operations. These audits allow companies to determine areas of significant generation and identify opportunities for improving energy performance. This might include record examinations, facility walk-throughs and waste sorting.

Actions to reduce waste generation: These are specific measures focused on reducing waste generation in areas of significant concern. Focus points are usually identified through a waste audit so that actions can be implemented to minimize waste. Examples of these should not be related to compliance with legal standards or requirements.

Quantified targets: Objectives with specific, measurable and quantifiable waste performance improvement targets (e.g., reduce waste generated by 15% by 2030, reduce the waste sent to landfill by 5% by the end of the year). These targets should be time-bound and include a target year.

Investments in innovation or research and development resources to minimize waste: This aspect seeks to understand if a company has allocated monetary, workforce or other resources to investigate new ideas or technology aimed at minimizing waste generation from its business operations. This might include sharing which waste-specific projects its research and development team is working on or the creation of working groups or other initiatives to address waste reduction.

Waste minimization training: Training provided to employees to raise awareness and better understand the benefits of reducing waste across operations.

Integration of recycling programs to reduce the waste sent to landfill: These are measures incorporated to reprocess materials for usage elsewhere in operations.

Waste diversion from landfill: Waste diversion is the practice of eliminating the operational waste sent to the landfill. Diverted materials are reduced, recycled, reused, composted and/or recovered for productive use. There is also a heavy emphasis on restructuring operations to eliminate waste from conception and redesign methods of operating.

Waste diversion from landfill certification: Companies validate waste diversion claims by certifying operations and some certify as "zero waste to landfill." This typically happens on a facility or project-level basis. Certifications may have different levels of recognition within them (gold, silver, bronze). However, they require operations to prove an 85% or higher diversion rate. We do not expect all operations to be certified. This may include, but is not limited to, certifications such as the TRUE Zero Waste Certification (Green Business Certification Inc), NSF Landfill-Free Verification, UL Solutions 2799A, Eurofins Zero Waste to Landfill Certificate and GreenCircle Certified Waste Diversion from Landfill Certification.

Diversion rate: This is the level at which a company has managed to recover waste otherwise destined for a landfill. This is typically achieved through reuse, recycling, composting and minimal amounts through energy production via incineration. An organization's diversion rate is calculated by adding the weight of all waste diverted from landfill and dividing it by the total amount of waste diverted plus what is sent to landfill. Calculation: weight of diverted waste / (weight of diverted waste + weight of waste set to landfill) x 100 = diversion rate

Waste diversion from landfill is certified by an independent accredited body: This aspect is NOT looking for assurance or third-party verification of waste diversion. Certification is accepted as it is assessed against a pre-existing set of standards (see standards above).

Data Requirements

It must be clear that these programs are occurring. We expect to find examples or explanations of how these programs have been integrated into operations. Commitments or statements without examples do not suffice.

Disclosure Requirements

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

Any response that cannot be verified in the attached public document(s) will not be accepted.

References

ISO 14001: https://www.iso.org/standard/60857.html
TRUE Zero Waste certification: https://true.gbci.org/true-certification-zero-waste
NSF Landfill-Free Verification: https://www.nsf.org/sustainability/circularity-waste-materials-management/landfill-free-verification
UL Solutions 2799A: https://ul.com/waste-diversion-and-circular-economy
Eurofins Zero Waste to Landfill Certificate: https://www.eurofins.com/assurance/consumer-products/audit-services/environmental/zero-waste-to-landfill-certification/
GreenCircle Certified Waste Diversion from Landfill Certification: https://www.greencirclecertified.com/operations-certifications

Standards & Frameworks

UNGC - G7, E3, E15
TNFD - Metrics and Targets B.

Waste Disposal

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

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

The proper handling of waste can enhance companies' competitiveness through reduced costs and environmental liabilities. It can also lead to companies being better prepared for future environmental regulations. This question addresses trends in waste disposal and recycling, specific to each industry, as well as the target set for the current financial year.

Question Layout

Does the company track its total solid waste recycled/reused and disposed?

o Yes, the company tracks its total solid waste recycled/reused and disposed. Please indicate where this information is available.

Waste	Unit	FY 2022	FY 2023	FY 2024	FY 2025	Target for FY 2025
Total waste recycled/reused	metric tonnes					
Total waste disposed	metric tonnes					
- Waste landfilled	metric tonnes					
- Waste incinerated with energy recovery	metric tonnes					
- Waste incinerated without energy recovery	metric tonnes					
- Waste otherwise disposed, please specify:	metric tonnes					
- Waste with unknown disposal method	metric tonnes					
Coverage (as a percentage of denominator)	percentage of:					

☐ The data is publicly available.
☐ The data has been third-party verified.
☐ The data is normalized.
☐ The data differs from its publicly reported figures. Please provide an explanation:

☐ The coverage is temporarily reduced due to corporate actions. Please provide an explanation:

Question-Specific Guidance & Definitions

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

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

Data Requirements

Please provide a breakdown of the company's total solid waste recycled/reused and disposed, disaggregated by the type of disposal method, for which its operations has a reliable and auditable data acquisition and aggregation systems are available.

If the company does not use a specific waste disposal method, please indicate "0".

For each row in the table, it is mandatory that the values provided are in the same unit.

Specific Data Requirements for Waste

Waste should be reported in dry metric tons of waste, disaggregated by the amount recycled/reused and the specific disposal method (waste landfilled, waste incinerated with or without energy recovery, waste otherwise disposed or waste with unknown disposal method), respectively.

- In case the company reports zero total waste disposed, third-party verification or supporting evidence is required (e.g., comprehensive comment, internal documentation or public reporting) to substantiate zero waste disposed
- If you only have information available on the waste disposed by some or no specific disposal methods (waste landfilled, waste incinerated with or without energy recovery, otherwise disposed), please report the total waste disposed and the values for those disposal methods for which you have reliable data. The rows for disposal methods without available data should be left blank. The difference between total waste disposed and the sum of the specific disposal methods will be automatically captured in the row "waste with unknown disposal method". Please note that the company will not lose points if no detailed breakdown of the disposal methods used is available

For companies that have the questions **"Hazardous Waste", "Ash and Gypsum Waste" or "Mineral Waste" or "Food Loss & Waste Impact"** in their questionnaire, please do not report information on these types of waste here but rather, report relevant data for these types of waste separately in those questions. For example: if a company has the question on "Waste Disposal" and the question on "Hazardous Waste" in the questionnaire, non-hazardous waste should be captured in the question on "Waste Disposal" and hazardous waste in the question on "Hazardous Waste", respectively. If you do not have these questions in your industry questionnaire, please include all types of waste in this question.

If a company sets long-term, but not annual targets, an annual target can be estimated based on internal target setting or a linear distribution. If a company does not have a specific target on waste disposed but specific (internal or public) targets on waste generated and/or recycled, the conversion to a waste disposed target is acceptable.

Waste from extraordinary activities should not be considered. The definition of what is considered to be extraordinary should be consistent with financial reporting. For 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 showing this verification is attached. Internal audits or verification will not be considered.

Please note: In cases where the company is classified within the **banks (BNK)**, **financial services (FBN)**, **insurance (INS)**, or **professional services (PRO)** industries, the score obtained in this question will not contribute to the final score of the company.

Companies that do not operate their own production sites, such as **pure Royalty companies**, should mark this question as **"**The question is not applicable to the company**".**

Data Consistency

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

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

- The environmental data of companies that are consolidated proportionally must be considered to the proportion at which they are consolidated financially.
- The environmental data of companies that are fully consolidated must be fully considered irrespective of the proportion to which they belong to the group.
- The 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.
- The 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.
- The 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 please explain in what way the data provided differs from the definitions.
- Please ensure that the "Company Information" section is correctly filled and that the coverage in the table below is based on the same denominator.

Disclosure Requirements

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

- Total waste disposed figure, or alternatively, total waste generated **and** recycled figures) for at least the most recent reported year. The specific breakdown of the disposal methods used is not required to be publicly available.

References

Directive 2008/98/EC of the European Parliament and of the Council (Waste Framework Directive)

Standards & Frameworks

SFDR-A - Non-Recycled Waste
UNGC - E3.1, E3.1.1, E15
TNFD-Annex 1 - C2.2 Pollution/pollution removal - Waste generation and disposal, Annex 2 - A23.1 Dependency, impact, risk and opportunity management - Changes to nature (dependency and impact): mitigation hierarchy steps, Metals - MM.A23.1 - Dependency, impact, risk and opportunity management: Changes to nature (dependency and impact): mitigation hierarchy steps - Circular economy
CDP 2025 - 7.52

Water

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

Water Efficiency Management Programs

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

AIR, ALU, ARO, ATX, AUT, BLD, BTC, BVG, CHM, CMT, CNO, COL, COM, COS, CSV, CTR, DHP, DRG, ELC, ELQ, FDR, FOA, FRP, GAS, HEA, HOU, ICS, IDD, IEQ, IMS, ITC, LEG, LIF, MNX, MTC, MUW, OGR, OGX, **OIE**, PIP, PUB, REX, RTS, SEM, SOF, STL, TCD, TEX, THQ, TLS, TOB, TRA, TRT, TSV

Question Rationale

Water is essential to develop and maintain successful and healthy economies and for human health and well-being. In any responsible business or organization, monitoring water use is a key indicator of its environmental sustainability performance. Knowing and managing water challenges can protect a business from significant and unforeseen costs caused by quantity and quality issues, which could also restrict business growth and obstruct important socio-economic benefits. Adequate water management can also protect an organization from regulatory breaches and negative reputational impacts.

This question assesses how companies are taking steps towards properly managing water as a critical resource for their businesses through specific water management programs. In their planning processes, companies must identify opportunities to continually improve water efficiency performance. Those programs should focus on reviewing water use, measuring and monitoring water use indicators, improving efficiency performance through reducing, replacing or reusing water in operations, etc.

The scope of this question is limited to direct operations and does not include the supply chain.

Question Layout

Does the company have programs on water efficiency management?

- Yes, the company has programs on water efficiency management. Please indicate where this information is available in **public reporting or corporate website.**
  - ☐ Water use assessment to identify opportunities for water efficiency improvements
  - ☐ Actions to reduce water consumption
  - ☐ Actions to improve wastewater quality
  - ☐ Establishment of targets to reduce water use
  - ☐ Application of water recycling
  - ☐ Awareness training provided to employees on water efficiency management programs

Question-Specific Guidance & Definitions

Water efficiency management programs: Include the planning and definition of actions that enable businesses to assess and account for their water use, identifying and implementing measures to achieve and improve efficiency through the systematic management of water.

It should consider the following:
Water use assessments: A company's process of reviewing and analyzing its water use, identifying activities and functions of significant water use, determining processes and services that affect used water quality, and monitoring water use quantities. These assessments determine the activities and functions with potential for better water efficiency. Data gathering, indicators monitoring and continuous reviewing allow for improvements in water efficiency performance. Please refer to ISO 46001 in the References section

Actions to reduce water consumption: All measures focused on reducing the amount of water required for business activities and operations. These can range from actions regarding equipment, systems or processes at facility/site level to those concerning employees/staff in office functions. Examples include water-saving devices, submeters installed in different plant areas, pressure reductions at taps, reuse of storm and grey water, rainwater harvesting, reusing process water for cooling towers, etc.

Actions to improve wastewater quality: The measures implemented at facility level focused on improving the quality of wastewater/discharge water. These can refer to improvements at the source (e.g., process improvements), effluent monitoring and periodic sampling, wastewater treatment processes (according to type of effluent), water discharge controls, inspections and audits, etc.

Establishment of targets to reduce water use: A water efficiency management program will allow for efficiency improvements based on quantitative, time-bound water reduction targets. We expect companywide targets or site-specific targets that clearly cover the majority of operational sites.

Application of water recycling: Companies can benefit from water reuse and recycling, that is, the process by which wastewater produced from one source is treated to be reused in the same process or recycled for another. Various methods for reusing or recycling industrial water are available, depending on water quality requirements, space constraints and budgetary considerations.

Awareness training provided to employees on water efficiency management programs: To help educate and engage employees regarding water efficiency management and conservation. This training should make staff aware of how to reduce water consumption in their daily jobs as well as able to identify problems and innovate solutions to reduce water use within the company. General references to "environmental care training" are not sufficient for this criterion.

Disclosure Requirements

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

Any response that cannot be verified in the attached public document(s) will not be accepted.

References

- ISO 46001: 2019 - Water efficiency management systems — Requirements with guidance for use: https://www.iso.org/standard/68286.html
- CEO Water Mandate: https://ceowatermandate.org/

Standards & Frameworks

SFDR-A - Water Management Policies
UNGC - E3, E3.1
EU Taxonomy - Appendix B
TNFD - Metrics and Targets B., Metrics and Targets C.

Water Consumption

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

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

Water is becoming increasingly scarce, and such scarcity poses a considerable risk to many sectors. Considering water withdrawal, consumption and discharge practices can enhance companies' competitiveness by reducing costs and environmental liabilities. It can also mean companies are better prepared for future environmental regulations.

Question Layout

Does the company track its freshwater consumption, including water withdrawal and discharge?

- ○ Yes, the company tracks its freshwater consumption, including water withdrawal and discharge. Please indicate where this information is available.

Water	Unit	FY 2022	FY 2023	FY 2024	FY 2025	Target for FY 2025
A. Water withdrawal (excluding saltwater)	Million cubic meters					
B. Water discharge (excluding saltwater)	Million cubic meters					
Total net fresh water consumption (A-B)	Million cubic meters					
Coverage (as a percentage of denominator)	percentage of:					

- ☐ The data is publicly available.
- ☐ The data has been third-party verified.
- ☐ The data is normalized.
- ☐ The data differs from its publicly reported figures. Please provide an explanation:
- ☐ The coverage is temporarily reduced due to corporate actions. Please provide an explanation:

Question-Specific Guidance & Definitions

Water withdrawal (excluding saltwater): Water withdrawal is defined as the sum of:
i. Fresh surface water, including rainwater, water from wetlands, rivers and lakes
ii. Groundwater – renewable and non-renewable
iii. Produced/entrained water
iv. Third party sources

Fresh surface water: Fresh surface water, including rainwater, water from wetlands, rivers, lakes and fresh water that requires minimal treatment to be acceptable for domestic or agricultural uses.

Groundwater - renewable and non-renewable: Groundwater that can be recovered from underground.

Produced/entrained water: Produced water, reinjected produced water.

Third party sources: Municipal water, local third-party water purchase, city water from public water department, trucked water purchased, tap water and reclaimed water.

Water discharge (excluding saltwater): The water leaving the organization's boundary and being released to surface water, groundwater or third parties during the reporting year.

Total net fresh water consumption: Water withdrawal (excluding saltwater) – water discharge (excluding saltwater).

Data Requirements

For each row in the table, it is mandatory that the values are provided in the same unit.

If the company is reporting on brackish surface water/seawater/saltwater, please deduct it from water withdrawal and water discharge, because we want to capture only total net fresh water consumption.

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

Please note: If the company **has reported a value of zero** in the table, third-party verification or supporting evidence is required (e.g., comprehensive comment, internal documentation or public reporting) to substantiate the zero reported.

Please note: In cases where the company is classified within the **Banks (BNK)**, **Financial Services (FBN)**, **Insurance (INS)**, or **Professional Services (PRO)** industries, the score obtained in this question will not contribute to the final score of the company.

MUW: This question should be marked "The question is not applicable to the company" for utilities generating more than 50% of their revenues from drinking water supply, distribution or wastewater treatment.

Data Consistency

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

General Data Requirements

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

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

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

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

Disclosure Requirements

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

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

References

CDP - Water Security 2022 Reporting Guidance: https://guidance.cdp.net/en/guidance?cid=35&ctype=theme&idtype=ThemeID&incchild=1&microsite=0&otype=Guidance&tags=TAG-597%2CTAG-607%2CTAG-599

Minerals Council of Australia (MCA) Water Accounting Framework, User Guide Version 2.0: https://minerals.org.au/wp-content/uploads/2022/12/MCA-Water-Accounting-Framework-User-Guide-2.0-2022.pdf

Standards & Frameworks

SFDR-A - Water Usage and Recycling
UNGC - E3.1, E3.1.1, E11
TNFD -Metrics and Targets C., Annex 1 - C2.1 Pollution/pollution removal - Wastewater discharged, Annex 2 - A3.0 Driver of nature change: resource use and replenishment - Total water consumption and withdrawal, Food - FA.A2.5 - Pollution/pollution removal - Water pollution, Food - FA.A2.6 - Pollution/pollution removal - Water use efficiency
CDP 2025 - 7.52, 9.15, 9.2, 9.1, 9.1.1, 9.15.2, 9.2.2, 9.2.7

Climate Strategy

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

The majority of the questions in this criterion have been developed in alignment with the CDP methodology (https://www.cdp.net).

Additionally, many questions in this criterion are aligned with the Task Force on Climate-related Financial Disclosure (TCFD) which published in 2017 a set of recommendations for voluntary and consistent climate-related financial risk disclosures in mainstream reporting. While the developed disclosure recommendations are voluntary, investors' demand for companies to report in line with TCFD is growing exponentially and governments are starting to move toward requiring TCFD disclosures through regulation.

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

Direct Greenhouse Gas Emissions (Scope 1)

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

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

The question assesses the company's direct greenhouse gas (Scope 1) emissions and their overall trend. Emissions are a critical indicator of a company's impact on the climate. Increasingly, the disclosure of emissions is expected from investors, and growing regulatory pressure has led to the mandatory disclosure of certain emissions. By disclosing emissions, investors and stakeholders can ascertain a company's climate risks and identify trends in emissions reduction to benchmark against competitors

Question Layout

Does the company track its direct greenhouse gas emissions (Scope 1)?

○ Yes, the company tracks its Scope 1 emissions. Please indicate where this information is available.

Scope 1	Unit	FY 2022	FY 2023	FY 2024	FY 2025	Target for FY 2025
Total direct GHG emissions (Scope 1)	metric tonnes CO2 equivalents					
Coverage (as a percentage of denominator)	percentage of:					

☐ The data is publicly available.
☐ The data has been third-party verified.
☐ The data is normalized.
☐ The data differs from its publicly reported figures. Please provide an explanation:

☐ The coverage is temporarily reduced due to corporate actions. Please provide an explanation:

☐ The company tracks Scope 1 and Scope 2 emissions on a consolidated basis.

Question-Specific Guidance & Definitions

GHG Scope 1: Greenhouse gas emissions refer to the emissions of the six main GHGs that are covered by the Kyoto Protocol. These gases are outlined below. Each GHG contributes to global warming in different ways, depending on its radiative properties, its molecular weight and its lifespan in the atmosphere.

Greenhouse Gases covered by the Kyoto Protocol:
Carbon dioxide (CO2): Emitted mainly from the burning of fossil fuels, carbon dioxide accounted for about 86% of the UK's human-induced (anthropogenic) GHG emissions in 2003.

Methane (CH4): Emitted mainly from agriculture, waste disposal, leakage from the gas distribution system and coal mining, methane contributed to over 6% 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 about 6% of UK GHG emissions in 2003.

Hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulfur hexafluoride (SF6): Collectively known as "F-gases", these are emitted mainly from air conditioning, refrigeration and industrial processes. Together, F-gases accounted for about 2% of UK anthropogenic GHG emissions in 2003.

Emissions from biologically sequestered carbon: In accordance with the Greenhouse Gas Protocol, emissions data for direct CO2 emissions from biologically sequestered carbon (e.g., CO2 from burning biomass/biofuels) must be reported separately from the Scopes.

Data Requirements

Please provide the company's total direct greenhouse gas emissions (DGHG Scope 1) for which its operations has a reliable and auditable data acquisition and aggregation system.

For each row in the table, it is mandatory that the values provided are in the same unit.

Specific Data Requirements for Greenhouse Gas Emissions:

- Greenhouse gas emissions should be reported as metric tonnes of CO2-equivalents.
- Data on greenhouse gas emissions should only include CO2 and all other greenhouse gas emissions.
- All greenhouse gas emissions emitted directly by the company should be reported.
- Greenhouse gas emissions of owned and/or managed fleet must be included.
- Greenhouse gas emissions due to commuting of employees should not be included.
- Greenhouse gas emissions of business travel other than by owned and/or operated fleet should not be included.

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 showing this verification is attached. Internal audits or verification will not be considered.

Please note: In case the company **has reported a value of zero** in the table, third-party verification or supporting evidence is required (e.g., comprehensive comment, internal documentation or public reporting) to substantiate the figure reported.

Data Consistency

- If the environmental performance data reported in the questionnaire does not correspond to the publicly reported figures, the corresponding option should be marked and the discrepancy should be explained. This option should not be indicated if the information is not publicly reported at all.
- If there is a temporary reduction in coverage due to a corporate action, the corresponding box should be marked and the reduction should be explained.
- If it is not possible to report the figures in absolute terms, the data should be reported in relative terms and the corresponding box should be ticked. Please note that information should always be reported in absolute terms, if possible, even if it deviates from public reporting.
- If GHG emissions are only reported and tracked as combined Scope 1 and Scope 2 emissions, the combined figures should be indicated in this question, the corresponding box should be ticked and the question, "EP – Indirect Greenhouse Gas Emissions (Scope 2)", should be marked as "The question is 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., Jan. 1 to Dec. 31 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 multiyear 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 toward achieving the target by the end of the target period. If you report a combined Scope 1 and Scope 2 target, please extrapolate the share equivalent to the absolute Scope 1 emission for inclusion in the table.

As a consequence, environmental performance data should only cover the direct emissions/resource use, i.e., resource use/emissions caused by the company and its consolidated activities. Emissions and resource use of suppliers and customers should be excluded. In particular, the environmental data of group companies should abide by the following rules:

- Environmental data of companies that are consolidated proportionally must be considered to the proportion at which they are consolidated financially.
- Environmental data of companies that are fully consolidated must be fully considered, irrespective of the proportion to which they belong to the group.
- Environmental data should refer to the specific company structure of each particular year. There should be no pro forma backward consolidation of the current company structure.

- Environmental data of companies that are sold or no longer consolidated should be excluded from environmental data as of the reporting period in which the company has not been consolidated anymore.
- Environmental data of companies that have been bought should only be included as of the reporting period in which the company is consolidated financially for the first time.
- Where environmental data does not cover all consolidated activities of the company, the coverage should be indicated together with the environmental data that is known.
- Where a company has no emissions/resource use, “0” should be used.
- Where the reported environmental data deviates from these definitions, please explain how 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 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 and that the coverage in the table below is based on the same denominator.

Disclosure Requirements

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.

Standards & Frameworks

CDP - CDP 2025-7.6, 7.9, 7.10.1
EU Taxonomy - Multiple Activities - Substantial Contribution to Climate Change Mitigation
SFDR - M - GHG Emissions and Intensity
TNFD - Annex 1 - Climate Change - GHG emissions
UNGC - E3.1, E3.1.1, E5, E5.1

Indirect Greenhouse Gas Emissions (Scope 2)

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

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

The question assesses the company's indirect greenhouse gas (Scope 2) emissions and its overall trend. Emissions are a critical indicator of a company's impact on the climate. Increasingly, the disclosure of emissions is expected from investors, and growing regulatory pressure has led to the mandatory disclosure of certain emissions. By disclosing emissions, investors and stakeholders can ascertain a company's climate risks and identify trends in emissions reduction to benchmark against competitors.

Question Layout

Does the company track its indirect greenhouse gas emissions (Scope 2)?

○ Yes, the company tracks its Scope 2 emissions. Please indicate where this information is available.

Scope 2	Unit	FY 2022	FY 2023	FY 2024	FY 2025	Target for FY 2025
Location-based	metric tonnes of CO2 equivalents					
Coverage (as a percentage of denominator)	percentage of:					
Market-based	metric tonnes of CO2 equivalents					
Coverage (as a percentage of denominator)	percentage of:					

☐ The data is publicly available.
☐ The data has been third-party verified.
☐ The data is normalized.
☐ The data differs from its publicly reported figures. Please provide an explanation:

☐ The coverage is temporarily reduced due to corporate actions. Please provide an explanation:

Question-Specific Guidance & Definitions

GHG Scope 2: Indirect impacts - energy use: Many companies report the GHG emissions incurred in the generation of the electricity they consume. For service companies, these indirect emissions can be more important than their direct environmental impacts. Ways that companies can mitigate these emissions include paying a renewable tariff or improving energy efficiency.

Location-based method: This reflects the average emissions intensity of grids on which energy consumption occurs (using mostly grid-average emission factor data).

Market-based method: This reflects emissions from electricity that companies have purposefully chosen, or their lack of choice. It derives emission factors from contractual instruments, which include any type of contract between two parties for the sale and purchase of energy-bundled certificates or a party's unbundled instruments. Even companies that do not purchase any market instrument are expected to report market-based emissions. As per the GHG Protocol's requirements, companies should make their reports by using their electricity supplier's emission rate or the residual mix, i.e., regional emission factors representing untracked or unclaimed energy and emissions. If such data is not available, then their market-based emissions will be equal to their location-based emissions.

Data Requirements

Please provide the company's Scope 2 indirect GHG emissions from energy purchased (purchased and consume, i.e., without energy trading) for which its operations has a reliable and auditable data acquisition and aggregation system.

For each row in the table, it is mandatory that the values provided are in the same unit.

GHG emissions should be reported in metric tonnes of CO2-equivalent. Data on GHG emissions should include CO2 and all other GHG emissions weighted according to GHG potential.

Please report your location-based emissions and market-based emissions.

Third-party verification: We expect that data in the most recent year reported, for at least one reporting method, has been third-party verified and that relevant documentation is attached showing this verification. Internal audits or verification will not be considered.

Please note: In case the company has reported a value of zero in the table, third-party verification or supporting evidence is required (e.g., comprehensive comment, internal documentation or public reporting) to substantiate the zero reported.

Data Consistency

- If the environmental performance data reported in the questionnaire do not correspond to the publicly reported figures, the corresponding option should be marked and the discrepancy should be explained. This option should not be indicated if the information is not publicly reported.
- If there is a temporary reduction in coverage due to a corporation action, the corresponding box should be marked and the reduction should be explained.
- If it is not possible to report the figures in absolute terms, the data should be reported in relative terms and the corresponding box should be ticked. Please note that information should always be reported in absolute terms if possible, even if it deviates from public reporting.
- If GHG emissions are only reported and tracked as combined Scope 1 and Scope 2 emissions, the combined figures should be indicated in the previous question, "Direct Greenhouse Gas Emissions (Scope 1)." The corresponding box should be ticked and this question, should be marked as "The question is not applicable to the company".

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., Jan. 1to Dec. 31 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 multiyear 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 toward achieving the target by the end of the target period. If you report a combined Scope 1+2 target, please extrapolate the share equivalent to the absolute Scope 2 emissions for inclusion in the table.

Environmental performance data should only cover the indirect emissions/resource use, i.e., resource use/emissions caused by the company and its consolidated activities. Emissions and resource use of suppliers and customers should be excluded. In particular, the environmental data of group companies should follow these rules:

- Environmental data of companies that are consolidated proportionally must be considered to the proportion at which they are consolidated financially.
- Environmental data of companies that are fully consolidated must be fully considered irrespective of the proportion to which they belong to the group.
- Environmental data of business travel other than by owned and/or operated fleet should not be included unless specifically asked for.
- Environmental data should refer to the specific company structure of each particular year. There should be no pro forma backward consolidation of the current company structure.
- Environmental data of companies that are sold or no longer consolidated should be excluded from environmental data as of the reporting period in which the company has not been consolidated anymore.
- Environmental data of companies that have been bought should only be included as of the reporting period in which the company is consolidated financially for the first time.
- Where environmental data does not cover all consolidated activities of the company, the scope should be indicated together with the environmental data that is known.
- For indicators where a company has no emissions/resource use,

"0" should be filled.

- Where the reported environmental data deviates from these definitions, you are asked to explain in what way the data provided differs from the definitions.
- If a company publicly reports on long-term targets instead of annual targets, an annual target has to be estimated based on internal target setting or linear distribution.
- The data must be provided in the unit indicated in the question. If the company is tracking the specific indicator in a different unit, the unit converter must be used to convert the data into the preferred unit.
- Please ensure that the "Company Information" section has been filled correctly and that the coverage in the table below is based on the same denominator.

Disclosure Requirements

Disclosure Requirements for Partially Public Question

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

- Indirect GHG emissions (Scope 2) figure for at least the most recent reported year for a minimum of one of the two Scope 2 reporting methods.

References

GHG Protocol Scope 2 Guidance, An amendment to the GHG Protocol Corporate Standard (2015), page 59.

CDP Technical Note: Accounting of Scope 2 emissions, updated in March 2022, page 20-21

Standards & Frameworks

CDP 2025 - 7.3, 7.7, 7.9, 7.1.1, 7.10.1

EU Taxonomy - Multiple Activities - Substantial Contribution to Climate Change Mitigation

SFDR - M - GHG Emissions and Intensity

TNFD - Annex 1 - Climate Change - GHG emissions

UNGC - E3.1, E3.1.1, E5, E5.1

Indirect Greenhouse Gas Emissions (Scope 3)

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

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

The question assesses the company's indirect emissions from the value chain (Scope 3 emissions) and assess its overall trend. Scope 3 emissions represent the majority of emissions for most industries so it is crucial for companies to measure all relevant sources of Scope 3 emissions in their value chain to identify climate risks and opportunities, provide transparency to the markets and comply with regulatory requirements.

Question Layout

Does the company track its indirect greenhouse gas emissions (Scope 3)?

- ○ Yes, the company tracks its Scope 3 emissions. Please indicate where this information is available.

Scope 3	Unit	FY 2022	FY 2023	FY 2024	FY 2025	Target for FY 2025
Total Scope 3 emissions	metric tonnes of CO2 equivalents					

Please provide the company's Scope 3 emissions split based on the 15 categories of the GHG Protocol Corporate Value Chain Standard. Please use the latest available data to calculate Scope 3 emissions. Disclose any information about the methodology used to calculate the emissions in each category and whether any emissions in each category has been excluded.

Scope 3 category	Emissions in the reporting year (metric tonnes CO2e)	Emissions calculation methodology or rationale for exclusions
1. Purchased goods and services		
2. Capital goods		
3. Fuel-and-energy-related-activities (not included in Scope 1 or 2)		
4. Upstream transportation and distribution		
5. Waste generated in operations		
6. Business travel		
7. Employee commuting		
8. Upstream leased assets		
9. Downstream transportation and distribution		
10. Processing of sold products		
11. Use of sold products		
12. End-of-life treatment of sold products		
13. Downstream leased assets		
14. Franchises		
15. Investments		
Other upstream		
Other downstream		

- ☐ The majority of the company's revenues is generated through royalties.
- ☐ The data is publicly available.
- ☐ The data has been third-party verified.
- ☐ The data is normalized.
- ☐ The data differs from its publicly reported figures. Please provide an explanation:
- ☐ The coverage is temporarily reduced due to corporate actions. Please provide an explanation:

Question-Specific Guidance & Definitions

GHG Scope 3: Scope 3 refers to indirect greenhouse gas emissions that are a consequence of the activities of the company and from sources not owned or controlled by the company. The GHG Protocol divides Scope 3 emissions into 15 categories that cover the upstream and downstream value chain activities of a company. Examples of upstream Scope 3 activities include the extraction and production of purchased materials and transportation of purchased fuels. Examples of downstream activities include the use of sold products and services and the transportation of sold goods.

Relevance: This refers to one of the five principles of the GHG Protocol's Corporate Value Chain Accounting and Reporting Standard, which states that the Scope 3 inventory should be based on the assumption that the GHG inventory appropriately reflects the GHG emissions of the company and serves users' decision-making needs, both within and beyond the company. Companies should use the principle of relevance when determining whether to exclude activities from the inventory boundary. Companies should also use the principle of relevance as a guide when selecting data sources.

According to the GHG Protocol, companies may use two types of data to calculate Scope 3 emissions: primary and secondary data.

Primary data: Includes data provided by suppliers or others that directly relate to specific activities in the reporting company's value chain. Primary activity data may be obtained through meter readings, purchase records, utility bills, engineering models, direct monitoring, mass balance, stoichiometry or other methods for obtaining data from specific activities in the company's value chain.

Secondary data: Includes industry average data (e.g., from published databases, government statistics, literature reviews and industry associations), financial data, proxy data and other generic data. In specific cases, companies may use specific data from one activity in the value chain to estimate emissions for another activity in the value chain. This type of data (i.e., proxy data) is considered secondary data since it is not specific to the activity for which emissions are being calculated.
Source: GHG Protocol

Data Requirements

For this question, our expectations are aligned with the guidelines of the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard. This means that we expect companies to account for all Scope 3 emissions and disclose and justify any exclusions (Completeness Principle of the GHG Protocol Scope 3 Standard).

For each row in the table, it is mandatory that the values provided are in the same unit.

Emissions calculation methodology and exclusions: Please provide a short description of the types and sources of data used to calculate emissions (e.g., activity data, emission factors and global warming potential values), along with a description of the methodologies, assumptions and allocation methods used.

Please also describe what has been excluded from the emissions calculation of each reported Scope 3 category (e.g., exclusions of specific suppliers/clients, business units, countries, offices, plants or types of greenhouse gases, etc.) and justify the reasons for the exclusion.

If a given category does not belong to the company's value chain, or has been deemed immaterial and therefore excluded from emission calculations, please enter a value of 0 in the corresponding field of the second table and provide an explanation in the "Emission calculation methodology or rationale for exclusion".

Specific Data Requirements for Greenhouse Gas Emissions:
GHG emissions should be reported as metric tonnes of CO2-equivalent (CO2e). Data on GHG emissions should include CO2 and all other GHG emissions weighted according to GHG potential.

All GHG emissions emitted in the upstream and downstream value chain of the company should be reported, if they are material/relevant. Companies should not exclude any activity that is expected to contribute significantly to the company's total Scope 3 emissions. GHG emissions reported in the first table and within each Scope 3 category should be as complete as possible, even if considerable estimations were needed.

Royalty companies and other franchisors (i.e., companies that grant licenses to other entities to sell or distribute its goods or services in return for payments) are expected to account for emissions that occur from the operation of franchises (i.e., Scopes 1 and 2 emissions of franchisees) in Scope 3 category 14, "Franchises."

Third-party verification: We expect that data in the most recent reported year or the year before the most recent year has been third-party verified and that relevant documentation is attached showing this verification. Internal audits or verification will not be considered. Please note it is not necessary that all individual Scope 3 categories are third-party verified to check the relevant checkbox. It is sufficient that the total Scope 3 value, or values for a few relevant categories, are third-party verified.

Data Consistency

- If the environmental performance data reported in the questionnaire do not correspond to the publicly reported figures, the corresponding option should be marked and the discrepancy should be explained. This option should not be indicated if the information is not publicly reported at all.
- If there is a temporary reduction in coverage due to a corporation action, the corresponding box should be marked and the reduction should be explained.
- If it is not possible to report the figures in absolute terms, the data should be reported in relative terms and the corresponding box should be ticked. Please note that information should always be reported in absolute terms if possible, even if it deviates from public reporting.

General data requirements
Environmental performance data should cover the activities of the entire company with the same consolidation approach as used in financial reporting and must refer to the financial year (e.g., Jan. 1 to Dec. 31 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 multiyear 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 toward achieving the target by the end of the target period. If you report a combined Scope 1+2+3 target, please extrapolate the share equivalent to the absolute Scope 3 emissions for inclusion in the table.

Environmental performance data should cover the emissions of suppliers and customers, and of other entities in the upstream and downstream value chain (e.g., franchisees, lessees and lessors, third-party logistics providers, retailers, etc.). In particular, the environmental data of group companies should follow these rules:

- Environmental data of companies that are consolidated proportionally must be considered to the proportion at which they are consolidated financially.
- Environmental data of companies that are fully consolidated must be fully considered irrespective of the proportion to which they belong to the group.
- Environmental data should refer to the specific company structure of each particular year. There should be no pro forma backward consolidation of the current company structure.
- Environmental data of companies that are sold or no longer consolidated should be excluded from environmental data as of the reporting period in which the company has not been consolidated anymore.
- Environmental data of companies that have been bought should only be included as of the reporting period in which the company is consolidated financially for the first time.
- Indicators, where a company has not calculated emissions, should be left blank. Zeros should be entered only when the company has calculated its emissions and their emissions are zero.
- Where the reported environmental data deviates from these definitions, please explain in what way the data provided differs from the definitions.
- If a company publicly reports on long-term targets instead of annual targets, an annual target has to be estimated based on internal target setting or linear distribution.
- The data must be provided in the unit indicated in the question.

Disclosure Requirements

Disclosure requirements for partially public question

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

- Indirect GHG emissions (Scope 3) figure for either the most recent reported year or the year before the most recent reported year, or of at least one individual Scope 3 category with value different from 0

References

This question contains categories of Scope 3 emissions and definitions of the GHG Protocol's Corporate Value Chain (Scope 3) Accounting and Reporting Standard, published in September 2011.

Standards & Frameworks

CDP - 7.50, 7.8, 7.9
SFDR - M - GHG Emissions and Intensity
TNFD - Annex 1 - Climate Change - GHG emissions
UNGC - E3.1, E3.1.1, E5, E6, E6.1

Climate Governance

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

The purpose of this question is to assess whether a company's board of directors and management carry direct responsibility for the oversight and management of climate risks and opportunities. This information helps investors and other stakeholders understand whether climate-related issues receive sufficient attention at the highest levels of governance. This can be indicated by the public disclosure of board oversight and management responsibility assigned to certain roles or committees, as well as the frequency of discussions on climate issues.

This question is aligned with the Taskforce on Climate-related Financial Disclosures (TCFD), which recommends organizations disclose information on board's oversight of climate-related issues as well as management's role in assessing and managing climate-related issues.

Question Layout

Does the company have governance mechanisms in place to oversee climate-related issues?

- ○ Yes, the company has governance mechanisms implemented to oversee climate-related issues. Please indicate where this information is available in **public reporting or corporate website.**

  Board oversight

  - ○ Yes, there is a board level committee with oversight of climate-related issues.

    Please select the committee from the drop-down list:
    Dropdown menu:
    Climate/Sustainability/ESG Committee
    Risk Committee
    Audit Committee
    Other committee with clear oversight on climate-related issues

  - ○ No, there is no board level committee with oversight of climate-related issues.

  - ☐ Climate issues are on the agenda of the board of directors. Please specify the frequency with which climate-related issues are scheduled agenda items:
    - ○ At least annually
    - ○ Less frequent than annually, or not specified

  Management Responsibility

  - ○ Yes, there is a management position or committee responsible for climate-related issues.

    Please select the appropriate option from the drop-down list:
    Dropdown menu:
    Chief Climate/Sustainability/ESG Officer
    Executive level climate or sustainability-specific committee
    Chief Risk Officer or another C-suite executive with climate responsibility (not CEO)
    Another committee with clear responsibility for management of climate-related issues
    Below C-suite management position with clear responsibility for management of climate-related issues

  - ○ No, there is no management position or committee with responsibility for climate-related issues.

Question-Specific Guidance & Definitions

Board-level committee with oversight: An assigned committee, formed of board members only, with responsibility for overseeing climate-related issues.

Management position: Highest ranking individuals with dedicated management responsibility for assessing and managing climate-related issues.

Management-level committee: A management-level committee responsible for assessing and managing climate-related issues.

Data Requirements

Board oversight: Board oversight refers to a board-level committee responsible for overseeing climate-related issues. Evidence that the committee oversees climate-related issues should be available in the relevant section in TCFD, CDP or other reports. Please select the correct option from the drop-down list.

If the board committee is different from a climate or sustainability-specific committee, the climate responsibility needs to be clearly described within public reporting.

In order to accept the committee as a board-level committee, all members must be part of the board. If the committee is made up of both board members and management, please record this committee in the “Management responsibility” section of the question.

For two-tier boards, the board-level committee must be formed of members of the supervisory board.

Management responsibility: Management responsibility refers to the highest level of management with dedicated responsibility for managing climate-related issues. This can either be an individual or a management-level committee. The individual or committee should not be part of the board of directors. Please select the correct option from the drop-down list. If you have both a ChiefClimate/Sustainability/ESG Officer and a Chief Risk Officer who manage climate-related risks, please select "Chief Climate/Sustainability/ESG Officer." The CEO will not be accepted for management-level responsibility as CEO has the ultimate responsibility for everything in a company. For two-tier boards, management responsibility can be at the management board level.

Disclosure Requirements

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

Standards & Frameworks

CDP 2025 - 4.3, 4.1.1, 4.1.2, 4.3.1
UNGC - G3, G3.1, E3.1.2

TCFD Disclosure

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

This question focuses on whether a company applies the framework of the Task Force on Climate-related Financial Disclosures (TCFD) or the succeeding International Sustainability Standards Board's (ISSB) IFRF S2 standards in the reporting of climate-related risks and opportunities. Demand for climate-related disclosure from investors has increased significantly since the release of the TCFD's recommendations in 2017. In addition, public sector leaders have noted the importance of transparency on climate-related issues within financial markets. Many national governments and public sector organizations formally support the TCFD/ ISSB, and some countries have announced mandatory disclosure requirements aligned with these standards. In the EU, the mandatory European Sustainability Reporting Standards (ESRS) are also embedded in the four core recommendations of TCFD/ISSB.
Delays in applying the TCFD/ISSB framework may not only result in missing the expectations of investors but in compliance costs.

Question Layout

Does the company integrate the TCFD framework in the management of climate-related risks and opportunities?

- ○ Yes, the company integrates the TCFD framework in the management of climate-related risks and opportunities. Please indicate where this information is available in **public reporting or corporate website.**

Governance

- ☐ a) Describe the board's oversight of climate related risks and opportunities.
- ☐ b) Describe management's role in assessing and managing climate-related risks and opportunities.

Strategy

- ☐ a) Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.
- ☐ b) Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.
- ☐ c) Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.

Risk management

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

Metrics & Targets

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

- ☐ b) Disclose Scope 1, Scope 2, and if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.
- ☐ c) Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.

○ No, the company does not integrate the TCFD framework but publicly commits to integrating its requirements. Please indicate when it plans to disclose these requirements.

Dropdown menu:
2024
2025 or later

Data Requirements

The company may also provide reports that are aligned with ISSB's International Financial Reporting Sustainability Disclosure Standard 2 (IFRS S2) since it is consistent with the four core recommendations and eleven recommended disclosures published by TCFD.

In case the company's report is aligned with EU ESRS, a reference or a mapping table to TCFD/ISSB is expected.

Disclosure Requirements

This question requires public evidence. Please indicate where in your public reporting you report information about applying the TCFD /ISSB framework.

Standards & Frameworks

CDP 2025 - 2.2.1, 4.10, 4.12.1, 5.1, 5.3.1
UNGC - G3, G3.1, G12, E3.1.2

Climate-Related Management Incentives

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

Assessment Focus

Change from Last Year

Changed from 2025

Applicable Industries

All

Question Rationale

This question aims to capture how rewards are associated with the management of climate change issues, including the 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

Does the company provide incentives for the management of climate change issues, including the attainment of targets?

○ Yes, the company provides incentives for the management of climate change issues, including the attainment of targets. Please indicate where this information is available.

Who is entitled to benefit from this incentive? Select each option only once	**Type of incentive**	**Incentivized KPIs: Please provide a description of the KPI and how it is incentivized**	**Public reporting**
Dropdown menu: Chief Executive Officer (CEO) Board or executive level Facility/Unit/Site management Employees Senior-mid management	Dropdown menu: Monetary Recognition	Dropdown menu: Emission reduction Resource use and efficiency Targets Strategy and financial planning Pollution Policies and commitments Engagement	☐ Yes
			☐ Yes
			☐ Yes

Question-Specific Guidance & Definitions

Incentives: Please note that incentives can be positive (i.e., giving access to something) or negative (i.e., preventing access to something). Examples of incentive types include:

- **Monetary:** A bonus or some form of financial remuneration.
- **Recognition (non-monetary):** Includes employee awards (e.g., employee of the year) or career progression schemes, but is not tied directly to any form of financial remuneration.
- **Other non-monetary rewards:** Includes increased holiday allowances, special assignment, etc.

Data Requirements

If several types of incentives are used in your company, please select the incentive that is most commonly employed and include the fact that your company also uses other incentives in the comment box.

Each employee group should only be selected once.

When you select an incentive for a certain employee group, it is not necessary for all employees in this group to be entitled to benefit from this incentive. For example, you can select the category "Facility/Unit/Site management" even if only one manager is entitled to the incentive.

Disclosure Requirements

Additional credit will be granted for relevant publicly available evidence for each of the following options:

- Person entitled to the benefit; and
- Type of incentive; and
- Incentivized KPI

Supporting evidence:

- The document(s) attached will be used to verify the response.
- The supporting documents need not be made available in the public domain.
- If a question text field is available, a comprehensive answer in that field can be accepted instead of a supporting document.
- Any response that cannot be verified in the attached document(s) or web link will not be accepted.

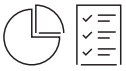
Standards & Frameworks

CDP 2025 - 4.5, 4.5.1, 7.55.3
UNGC – G8

Climate Risk Management

Public: this question requires publicly available information

Assessment Focus



Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

The purpose of this question is to assess whether your company has a climate risk management process which is a process for identifying, assessing, and responding to climate-related risks. Although nearly all organizations are affected by climate change-related risks, the most significant effects of climate change are likely to emerge over the medium to longer term, while the precise timing and magnitude of these impacts remain uncertain. Climate risk assessments covering different climate risk types, different value chain stages and time-horizons can be helpful to understand the potential effects of climate change on companies' businesses, strategies, and financial performance.

This question is aligned with the risk management recommendations of the Taskforce on Climate-related Financial Disclosures (TCFD), which include recommended disclosures on the organization's processes for identifying and assessing climate-related risks, and on how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.

This question is also aligned with the European Union's Directive 2014/95/EU on nonfinancial reporting, which demands companies to consider their whole value chain when reporting on their climate-related risks and opportunities. Risks of negative impacts on an organization and risks of negative impacts on the climate may arise from companies' own operations and may also occur throughout the value chain, both upstream in the supply chain and downstream.

Question Layout

Does the company have a climate risk management process?

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

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

  Types of climate-related risk included in risk assessment
  - ☐ Current regulation
  - ☐ Emerging regulation
  - ☐ Technology risk
  - ☐ Legal risk
  - ☐ Market risk
  - ☐ Reputational risk
  - ☐ Acute physical risk
  - ☐ Chronic physical risk

  Value chain stages covered by climate risk assessment
  - ☐ Own operations
  - ☐ Upstream activities
  - ☐ Downstream activities and/or clients

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

Question-Specific Guidance & Definitions

Risk assessment: A systematic process that an organization uses to evaluate potential risks that may impact its assets and operations.

(TCFD (2017), Recommendations of the Task Force on Climate-related Financial Disclosures)

Physical risks: Physical risks resulting from climate change can be event driven (acute) or longer-term shifts (chronic) in climate patterns. Physical risks may have financial implications for organizations, such as direct damage to assets and indirect impacts from supply chain disruption. Organizations' financial performance may also be affected by changes in water availability, sourcing, and quality; food security; and extreme temperature changes affecting organizations' premises, operations, supply chain, transport needs, and employee safety.

- **Acute physical** risks refer to those that are event-driven, including increased severity of extreme weather events, such as cyclones, hurricanes, or floods.
- **Chronic physical** risks refer to longer-term shifts in climate patterns (e.g., sustained higher temperatures) that may cause sea level rise or chronic heat waves.

TCFD (2017) https://www.tcfdhub.org/Downloads/pdfs/E06%20-%20Climate%20related%20risks%20and%20opportunities.pdf

Transition risks: Transitioning to a lower-carbon economy may entail extensive policy, legal, technology, and market changes that address mitigation and adaptation requirements related to climate change. Depending on the nature, speed, and focus of these changes, transition risks may pose varying levels of financial and reputational risk to organizations. Transition risks can be divided into four categories: policy and regulatory risks, technological risks, market risks, and reputational risks.

- **Policy, regulation and legal risks** include implementing carbon-pricing mechanisms to reduce GHG emissions, shifting energy use toward lower-emission sources, and adopting energy-efficiency solutions. The risks associated and the financial impact of policy changes depend on the nature and timing of the policy change. Another important risk is litigation risk, which can occur as a result of litigation by parties such as property owners, municipalities, states, insurers, shareholders, and public interest organizations.
- **Current regulations** include current laws and regulation related to carbon pricing mechanisms, emissions reporting, existing products and services, the supervision of climate risks in the financial sector (Financial services only)
- **Emerging regulations** include emerging laws and regulation related to carbon pricing mechanisms, emissions reporting, existing products and services, the supervision of climate risks in the financial sector (Financial services only)
- **Technological risks** result from technological improvements or innovations that support the transition to a lower-carbon, energy-efficient economy. For example, the development and use of emerging technologies such as renewable energy, battery storage, energy efficiency, and carbon capture and storage will affect the competitiveness of certain organizations, their

production and distribution costs, and ultimately the demand for their products and services from end-users.
- **Market risks** can impact companies in various ways. One of the major ways is through shifts in supply and demand for certain commodities, products, and services.
- **Reputational risks** may arise from changing customer or community perceptions of an organization's contribution to or detraction from the transition to a lower-carbon economy.

TCFD (2017), Technical Supplement: The Use of Scenario Analysis in Disclosure of Climate-related Risks and Opportunities)

Value chain: Terminology used to describe the upstream and downstream life cycle of a product, process, or service, including material sourcing, production, consumption, and disposal/recycling.
- **Upstream activities** include operations that relate to the initial stages of producing a good or service, e.g., material sourcing, material processing, and supplier activities.
- **Own operations** include operations related to the direct stages of producing a good or service, such as the manufacturing or processing of materials into a finished product.
- **Downstream activities** include operations that relate to processing the materials into a finished product, delivering it to the end user, and the customer use phase (e.g., transportation, distribution and consumption).

(TCFD (2017), Technical Supplement: The Use of Scenario Analysis in Disclosure of Climate-related Risks and Opportunities)

Time horizon: Terminology used to describe what your organization considers to be short-, medium- and long-term horizons (from year to year) when considering the expected lifetime of the assets or activities.

Data Requirements

For the first part of the question, please select the option that best describes the risk management procedures with regard to climate change risks and opportunities.

If your organization has more than one climate risk management process, please select the one that is most commonly employed.

Please include in your response which types of physical and transition risks are considered in your risk assessment, along with the value chain stages covered and the time horizons considered.

Value chain stages considered may differ depending on which types of physical and transition risks are considered. Please select all the value stages considered and time horizons included if they were used to assess at least one of the physical or transition risk types selected. Time horizons must be available for at least one of the physical or transition risk types selected.

Disclosure Requirements

Supporting evidence:
- The document(s) you attached will be used to verify your response.
- The supporting documents must be available in the public domain.
- Any response that cannot be verified in the attached document(s) will not be accepted

References

TCFD (2017), Technical Supplement: The Use of Scenario Analysis in Disclosure of Climate-related Risks and Opportunities
https://www.fsb-tcfd.org/publications/final-technical-supplement/
CDP (2017), CDP Technical Note on Scenario Analysis – Conducting and disclosing scenario analysis
EU, Technical Expert Group (TEG)(2020) Technical Annex on technical screening criteria for economic activities that can make a substantial contribution to climate change mitigation or adaptation.
https://finance.ec.europa.eu/sustainable-finance/tools-and-standards/eu-taxonomy-sustainable-activities_en
European Commission, Guidelines on reporting climate-related information https://ec.europa.eu/finance/docs/policy/190618-climate-related-information-reporting-guidelines_en.pdf

Standards & Frameworks

CDP 2025 - 2.2.1, 2.2.2, 3.1.1, 5.1.1
EU Taxonomy - Appendix A
TNFD - Strategy A., Risk Management A(i), Risk Management C.
UNGC – G4, E7.

Climate-Related Scenario Analysis

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

Companies need to consider a broad range of assumptions, uncertainties, and potential future states to understand the potential effects of climate change on their businesses, strategies, and financial performance across different time horizons and temperature pathways. One way to do this is through conducting climate-related scenario analysis.

This question is aligned with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), which include a recommended disclosure on the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2 degrees C or lower scenario.

Question Layout

Does the company conduct climate-related scenario analysis?

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

Please select any climate-related scenarios that the company has used in their climate-related scenario analysis:

Scenario type	2 degrees C or below	Above 2 degrees
Transition scenario	☐ IEA Net Zero Emissions by 2050 Scenario ☐ IEA 2°C Scenario ☐ IEA Beyond 2°C Scenario ☐ IEA 450 ☐ IEA Sustainable Development Scenario ☐ IEA Announced Pledges Scenario or nationally determined contributions (NDCs) ☐ Greenpeace ☐ DDP ☐ IRENA ☐ BNEF NEO ☐ NGFS (2 degrees or below scenarios)	☐ IEA Stated Policies Scenario (previously IEA New Policies Scenario) ☐ IEA Current Policies Scenario ☐ NGFS (Above 2 degrees scenarios)
Physical scenario	☐ RCP 1.9 (or SSP1 1.9) ☐ RCP 2.6 (or SSP1 2.6)	☐ RCP 3.4 (or SSP4 3.4) ☐ RCP 4.5 (or SSP2 4.5) ☐ RCP 6.0 (or SSP4 6.0) ☐ RCP 7.0 (or SSP3 7.0) ☐ RCP 8.5 (or SSP5 8.5)

☐ The company's analysis covers at least one 2 degrees C or below scenario that is not listed in the table, please provide further details.

☐ The company's analysis covers at least one above 2 degrees scenario that is not listed in the table, please provide further details.

Question-Specific Guidance & Definitions

Scenario analysis: Process for identifying and assessing a potential range of outcomes of future events under conditions of uncertainty. In the case of climate change, for example, scenarios allow an organization to explore and develop an understanding of how the physical and transition risks of climate change may impact its businesses, strategies, and financial performance over time. Climate-related scenario analysis should consider climate risks that are material to companies' operations and value chain.

(TCFD (2017), Recommendations of the Task Force on Climate-related Financial Disclosures)

Qualitative scenario analysis: Explores relationships and trends for which little or no numerical data is available. This is generally a high-level narrative approach to scenario analysis, suitable for organizations that are familiarizing themselves with the process. For example, relying on industry trends and applying them to a specific organization or business activity, or undertaking quantitative research into a specific trend.

Quantitative scenario analysis: Assesses measurable trends and relationships using quantitative models, data sets and other analytical techniques to illustrate potential pathways or outcomes. This is a more detailed approach to conducting scenario analysis. External third-party scenarios or datasets can be used. Companies can also develop in-house modeling capabilities that consider specific assumptions or parameters.

2 degrees C or below 2 degrees, and above 2 degrees: Under the 2015 Paris Agreement on climate change, nearly 200 countries agreed to limit global warming to no more than 2 degrees C by 2100, and to aim for a no more than 1.5-degree increase. The 2-degree scenario is widely seen as the global community's accepted limitation of temperature growth to avoid significant and potentially catastrophic changes to the planet. Scenarios of 2 degrees or below can be referred to as "Paris Aligned." Scenarios of above 2 degrees of warming show a potential situation where this agreement is not met.

https://www.spglobal.com/en/research-insights/articles/what-s-the-deal-with-the-2-degree-scenario

IPCC RCP/SSP: The UN Intergovernmental Panel on Climate Change (IPCC) produces physical risk scenarios under a variety of warming pathways. Within its sixth assessment report, designated as AR6, new scenarios were developed called shared socioeconomic pathways (SSPs). The SSPs aim to replace representative concentration pathways (RCPs), although RCPs still form the basis of SSPs and are widely used.

https://www.ipcc.ch/assessment-report/ar6/

International Energy Agency (IEA): The IEA produces various energy and transition risk-related scenarios, the details of which can be used for transition risk scenario analysis.

https://www.iea.org/reports/global-energy-and-climate-model

Other listed transition scenarios:

- Network for Greening the Financial System (NGFS): https://www.ngfs.net/ngfs-scenarios-portal/
- Greenpeace: https://www.greenpeace.org/static/planet4-canada-stateless/2018/06/Energy-Revolution-2015-Full.pdf
- Deep Decarbonization Pathways (DDP): https://ddpinitiative.org/display/
- International Renewable Energy Agency (IRENA): https://www.irena.org/publications/2020/Sep/Scenarios-for-the-Energy-Transition-Global-experience-and-best-practices
- BloombergNEF New Energy Outlook (BNEF NEO): https://about.bnef.com/new-energy-outlook/

Data Requirements

Please select all the climate scenarios you have used to assess physical and transition risks. In line with the TCFD recommended disclosure, at least two scenarios are required for full scoring. One of these scenarios should be based on a warming limit of 2 degrees C or lower. The other scenario should be based on a warming limit of above 2 degrees.

If your company conducts climate scenario analysis with scenarios that are not listed in the question table, please describe the following elements in the text box below the selected option. Please note that this information should be available in the public domain.

- A description of the scenarios used, and whether they are scenarios of 2 degrees C or lower, or above 2 degrees.

Please note: For companies that use NGFS scenarios for physical risks and transition, please select the "The company's analysis covers at least one [...] scenario that is not listed in the table" option depending on the temperature used.

Mentioning the existence of climate scenarios or their implications for the sector as a whole is not accepted for this question.

Disclosure Requirements

- The document(s) you attached will be used to verify your response.
- The supporting documents must be available in the public domain.
- Any response that cannot be verified in the attached document(s) will not be accepted.

References

TCFD (2017), Technical Supplement: The Use of Scenario Analysis in Disclosure of Climate-related Risks and Opportunities
https://www.fsb-tcfd.org/publications/final-technical-supplement/
CDP (2017), CDP Technical Note on Scenario Analysis – Conducting and disclosing scenario analysis
European Commission, Guidelines on reporting climate-related information
https://ec.europa.eu/finance/docs/policy/190618-climate-related-information-reporting-guidelines_en.pdf

Standards & Frameworks

CDP 2025 - 5.1, 2.2.1, 5.1.1
TNFD - Strategy C.
EU Taxonomy - Appendix A
UNGC – G4, E7

Physical Climate Risk Adaptation

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

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

The climate risk assessment of physical and transition risks is the basis on which companies plan adaptation and mitigation measures for those risks. Adaptation and mitigation measures are ideally planned so that context-specific factors are considered for all relevant assets and operations, since climate-related hazards are location- and context-specific.

This question focuses on adaptation measures for physical risks. Climate change adaptation can be understood as anticipating the adverse effects of climate change and taking the appropriate action to prevent or minimize the damage it can cause. Adaptation includes business opportunities such as new technologies to use scarce water resources more efficiently or the building of new flood defenses.

Climate change mitigation and adaptation is a central part of the EU taxonomy for sustainable activities. The information on risk assessment of physical impacts is required for evaluating compliance with the EU taxonomy's Do No Significant Harm criteria on climate change adaptation. The EU taxonomy demands that an activity integrates physical and nonphysical measures aimed at reducing all material risks that have been identified through a climate risk assessment. For existing activities, the implementation of those physical and nonphysical measures may be phased and executed over a period of up to five years. For new activities, implementation of these measures must be met at the time of design and construction. (EU Technical Expert Group, Taxonomy Report, Technical Annex).

Question Layout

Does the company have an existing plan to adapt to physical climate risks?

- ○ Yes, the company has a **context-specific plan** to adapt to physical climate risks in existing and/or new operations. Please provide supporting evidence and indicate if this is available in the public domain.
  - ☐ The risk assessment and plan to adapt to physical climate risks cover the following share of the company's **existing operations** (percentage of total revenues):

    The plan includes a target to implement relevant adaptation measures within the following timeline for existing operations:
    - ○ Less than five years
    - ○ Five to 10 years
    - ○ More than 10 years
  - ○ The risk assessment and plan to adapt to physical climate risks cover the following share of the company's **new operations** (Percentage of new operations):
  - ○ The company has no new asset planned
  - ☐ The context-specific plan is publicly available.
- ○ Yes, the company has an **overall plan** to adapt to potential physical climate risks. Please provide supporting evidence and indicate if this is available in the public domain.

  The plan includes a target to implement relevant adaptation measures within the following timeline:
  - ○ Less than five years
  - ○ Five to 10 years
  - ○ More than 10 years
  - ☐ The overall plan is publicly available.

Question-Specific Guidance & Definitions

Adaptation: Anticipating the adverse effects of climate change and taking appropriate action to prevent or minimize the damage it can cause, or taking advantage of opportunities that may arise.

Context-specific: Adaptation responds to physical climate risks that are mostly location- and context-specific. Due to this, organizations can best assess climate-related risks and mitigate them based on a context-specific plan. For example, there are, in principle, several engineering and non-engineering options available to a coastal city to respond to the risks resulting from increased sea levels. Responses will vary according to where the city is located, its size, the institutional and financial capacity of the city administration to deal with climate risk, the technical and engineering expertise available, the priority of the city, the perception of the citizens, and other factors. The adaptation responses can benefit the city that adopts them and the systems that depend on or interact with the city.

A context-specific plan integrates physical and non-physical measures aimed at reducing - to the extent possible and on a best-effort basis - all material risks that have been identified through a climate risk assessment
(EU Technical Expert Group, Taxonomy Report, Technical Annex)

New operations: Refers to assets planned, under construction or put in use after the current reporting cycle (e.g., after 2021 for the 2022 CSA).

Data Requirements

If your company has performed a climate risk assessment for physical risks and no material physical risks were identified, please select “The question is not applicable to the company” to this question and provide a detailed explanation.

Disclosure Requirements

Additional credit will be granted for public disclosure of a context-specific or an overall plan to adapt to physical climate risks.

References

EU, Technical Expert Group (TEG)(2020) Technical Annex on technical screening criteria for economic activities that can make a substantial contribution to climate change mitigation or adaptation.
https://ec.europa.eu/info/sites/info/files/business_economy_euro/banking_and_finance/documents/200309-sustainable-finance-teg-final-report-taxonomy-annexes_en.pdf
European Commission, Guidelines on reporting climate-related information
https://ec.europa.eu/finance/docs/policy/190618-climate-related-information-reporting-guidelines_en.pdf

Standards & Frameworks

CDP 2025 - 2.2.1
EU Taxonomy - Appendix A
UNGC - E3, E7

Emissions Reduction Targets

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

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

Question Layout

Does the company have corporate-level emissions reduction targets?

○ Yes, the company has corporate-level emissions reduction targets. Please indicate where this information is available in **public reporting or corporate website.**

Target type and metric	Scope covered by the target	Target timeframe	Baseline year emissions	Percentage reduction target	Is this target validated by the Science-based Targets Initiative?
Target 1 ○ Absolute target ○ Intensity target Dropdown menu: Metric tons CO2e per square meter Metric tons CO2e per metric ton of aluminum Metric tons CO2e per metric ton of steel Metric tons CO2e per metric ton of cement Metric tons CO2e per metric ton of cardboard Grams CO2e per kilometer Metric tons CO2e per unit revenue Metric tons CO2e per unit FTE employee Metric tons CO2e per unit hour worked Metric tons CO2e per metric ton of product Metric tons of CO2e per liter of product Metric tons CO2e per unit of production Metric tons CO2e per unit of service provided Metric tons CO2e per square foot Metric tons CO2e per kilometer Metric tons CO2e per passenger kilometer Metric tons CO2e per megawatt hour (MWh) Metric tons CO2e per barrel of oil equivalent (BOE) Metric tons CO2e per vehicle produced Metric tons CO2e per metric ton of ore processed Metric tons CO2e per ounce of gold Metric tons CO2e per ounce of platinum Metric tons of CO2e per metric ton of aggregate Metric tons of CO2e per billion (currency) funds under management Grams CO2e per revenue passenger kilometer Metric tons CO2e per USD($) value-added or specify another intensity metric	☐ Scope 1 ☐ Scope 2 ☐ Scope 3	Base year Target year	Base year emissions Percentage of total base year emissions		○ Yes ○ No, but the company has publicly committed to seek validation to the target by the SBTi ○ No, but the company considers the target to be science-based ○ No, the target is not science-based
Target 2 ○ Absolute target ○ Intensity target or specify another intensity metric	☐ Scope 1 ☐ Scope 2 ☐ Scope 3	Base year Target year	Base year emissions Percentage of total base year emissions		○ Yes ○ No, but the company has publicly committed to seek validation to the target by the SBTi ○ No, but the company considers the target to be science-based ○ No, the target is not science-based
Target 3 ○ Absolute target ○ Intensity target or specify another intensity metric	☐ Scope 1 ☐ Scope 2 ☐ Scope 3	Base year Target year	Base year emissions Percentage of total base year emissions		○ Yes ○ No, but the company has publicly committed to seek validation to the target by the SBTi ○ No, but the company considers the target to be science-based ○ No, the target is not science-based

Question-Specific Guidance & Definitions

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

Intensity target: A target that describes a future reduction in emissions that is normalized to a business metric compared with normalized emissions in a base year.

Intensity measure: Grams of carbon dioxide equivalent (CO2e) or metric tons of CO2e per kilometer, per US dollar value-added, per square meter, per unit revenue, per unit full-time equivalent (FTE) employee, per unit hour worked, per unit of production, or per unit of service provided, etc.

Science-based targets: According to the Science Based Targets initiative, targets are considered science-based if they are in line with what the latest climate science deems necessary to meet the goals of the Paris Agreement on climate change: limiting global warming to well below 2 degrees C above preindustrial levels and pursuing efforts to limit warming to 1.5 degrees C.

Data Requirements

- If the company also answers the question Net-Zero Commitment, please do not provide the net-zero target in this question, but provide details on interim emissions reduction targets.
- Companies are expected to set absolute or intensity emission targets. If the company has both absolute and intensity targets, please prioritize the absolute target.
- If the company provides the intensity target in this question, please select the intensity measure used (metric).

Scopes covered by the target: Scopes covered by the company's emissions reduction target and reduction of emissions to be achieved in the target year compared with the base year.

- If the company reports a target that covers Scope 1+2 combined, please complete the first row "Target 1" and tick Scopes 1 and 2. You can also add a separate Scope 3 target in the row "Target 2".
- If the company reports that covers Scope 1+2+3 combined, please complete the first row "Target 1", tick Scopes 1, 2 and 3 and leave the other two rows blank.
- If the company reports a target that covers Scope 1, 2 and 3 separately, please complete Target 1, Target 2 and Target 3 rows.
- If the company reports a target that only covers Scope 3, please complete the "Target 1" row only and tick Scope 3.

Industry-specific guidance:

Financial institutions (BNK/FBN/INS)

- We expect short-term emission targets to focus on operational emissions.
- Category 15 financed emissions targets should be accounted for in "Net-Zero Targets for Financed Emissions" under the "Decarbonization Strategy Criteria."

Oil and Gas

(OGR/OGX/PIP/COL)

- SBTi does not accept emission reduction targets from oil and gas companies. Therefore, for the part 'Is the target validated by Science-Based Targets initiative?', we cannot accept any option other than 'No, the target is not science-based'

OIE - SBTi validated target will be accepted if the company derives less than 50% of revenue from:

- sale, transmission and distribution of fossil fuels
- providing equipment or services to fossil fuel companies

Please see the SBTi website for further details under 'What is the SBTi's policy on fossil fuel companies?'
https://sciencebasedtargets.org/sectors/oil-and-gas#what-is-the-sbtis-policy-on-fossil-fuel-companies

Disclosure Requirements

Supporting evidence:

- The document(s) you attach will be used to verify your response.
- The supporting documents must be available in the public domain.
- Any response that cannot be verified in the attached document(s) will not be accepted

References

https://sciencebasedtargets.org/

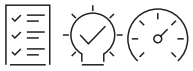
Standards & Frameworks

CDP 2025 -7.5, 7.53, 7.53.1, 7.53.2
TNFD - Metrics and Targets C.
UNGC - E3.1, E3.1.1, E5
SFDR - A - Carbon Emission Reduction Initiatives

Internal Carbon Pricing

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

Assessment Focus



Change from Last Year

Changed from 2025

Applicable Industries

All

Question Rationale

Many major publicly traded companies have integrated an internal carbon price as a core element in their ongoing business strategies. Such carbon pricing has become a standard operating practice in business planning as a means of testing strategic and investment assumptions' vulnerability to ever-stronger climate-related regulation and the broader emergence (explicitly or implicitly) of a cost of carbon. Through this question, we aim to assess how robustly companies are using this approach to anticipate an eventual regulatory approach in some form to address climate change.

Question Layout

Does the company use an internal carbon price?

○ Yes, the company uses an internal carbon price. Please indicate where this information is available.

Aspect	Details		Public reporting	
Objectives to implement a carbon price	☐	Conduct cost-benefit analysis	☐	Yes
	☐	Drive energy efficiency		
	☐	Drive low-carbon investments		
	☐	Incentivize consideration of climate-related issues in decision making		
	☐	Incentivize consideration of climate-related issues in risk assessment		
	☐	Identify and seize low-carbon opportunities		
	☐	Influence strategy and/or financial planning		
	☐	Navigate regulations		
	☐	Reduce upstream value chain emissions		
	☐	Setting and/or achieving of climate-related policies and targets		
	☐	Set a carbon offset budget		
	☐	Stress test investments		
GHG Scopes covered	☐	Scope 1	☐	Yes
	☐	Scope 2		
	☐	Scope 3		
Type of internal carbon price	☐	Shadow price	☐	Yes
	☐	Internal fee		
	☐	Internal trading		
	☐	Implicit price		
Price (per metric tonne CO2e)			☐	Yes
	Currency: Price in USD			
Mandatory application	Dropdown menu: All business decision-making processes Some business decision-making process Not reported No		☐	Yes

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.

Type of internal carbon price:

- **Shadow price:** attaching a hypothetical cost of carbon to each tonne of CO2e as a tool to reveal hidden risks and opportunities throughout its operations and supply chain and to support strategic decision-making related to future capital investments.
- **Implicit carbon price:** dividing the cost of abatement/procurement by the tonnes of CO2e abated. This calculation helps quantify the capital investments required to meet climate-related targets and is frequently used as a benchmark for implementing a more strategic internal carbon price.
- **Internal fee:** charging responsible business units for their carbon emissions. These programs frequently reinvest the collected revenue back into clean technologies and other activities that help transition the entire company towards lower-carbon operations and investments.
- **Internal trading:** mechanism allowing internal business units to trade allocated carbon credits.

Data Requirements

In case your company uses more than one type of internal carbon price, please report the price that has the greatest impact on your organization (i.e., price * quantity of emissions generated). In case your company uses a differentiated pricing which varies for example by region or business unit, please report the maximum price used.

Price (per metric tonne CO2e): Please report the value of the price per metric tonne you use for your analysis and not the total value of your analysis.

Please make sure that the value "Price in USD" is filled. If you report the internal carbon price in other currency than USD in the field above, please also make sure to report the value in USD.

For a full score, the internal carbon price is expected to be on the level of at least USD 100. This is aligned with the estimate of the High-Level Commission on Carbon Price endorsed by the World Bank stating that a price between USD50-USD100 per tCO2e by 2030 is aligned with the Paris Agreement.

GHG Scopes covered: Scope 3 is not expected to cover all Scope 3 categories, but the ones considered material by the company.

Disclosure Requirements

Supporting evidence:

- The document(s) you attached will be used to verify the qualitative part of your response. If a question text field is available, a comprehensive answer in that field can be accepted instead of a supporting document. Any qualitative response that cannot be verified in the attached document(s) or via the information provided in the related question text field (if available) will not be accepted.
- Quantitative figures provided in the response do not need supporting evidence. You may still provide a reference using the reference clip. This could include examples of the underlying calculations or approaches to data aggregation used to compile the provided quantitative information.
- The supporting documents do not need to be available in the public domain.

Disclosure requirements for partially public question:
Additional credit will be granted for relevant publicly available evidence for each option.

- Objectives to implement a carbon price
- GHG Scope covered
- Type of internal carbon price
- Price (per metric tonne CO2e)
- Mandatory Application

References

Ecofys, the Generation Foundation and CDP (2017), "How to guide to corporate internal carbon pricing – Four dimensions to best practice approaches", Consultation Draft

Standards & Frameworks

CDP 2025 - 5.10, 5.10.1, 7.55.3

Net-Zero Commitment

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

Changed from 2025

Applicable Industries

AIR, ALU, ARO, ATX, AUT, BLD, BTC, BVG, CHM, CMT, CNO, COL, COM, CON, COS, CSV, CTR, DHP, DRG, ELC, ELQ, FDR, FOA, FRP, GAS, HEA, HOM, HOU, ICS, IDD, IEQ, IMS, ITC, LEG, LIF, MNX, MTC, MUW, OGR, OGX, **OIE**, PIP, PRO, PUB, REI, REM, REX, RTS, SEM, SOF, STL, TCD, TEX, THQ, TLS, TOB, TRA, TRT, TSV

Question Rationale

Companies are increasingly adopting net-zero targets to align their activities with the aim of limiting the rise of global temperature to 1.5 degrees C above preindustrial levels. Due to the lack of common understanding of the definition of net-zero, the Science Based Targets initiative (SBTi) developed a global science-based standard for companies to set net-zero targets.

The purpose of this question is to find out if a company has made a net-zero commitment, how well it is aligned with the science-based targets and what activities are planned to reach the target. This question follows the criteria and definitions of the SBTi Net-Zero Standard

Question Layout

Has the company committed to reaching net-zero emissions across its value chain and is it available publicly?

○ Yes, the company has publicly committed to reaching net-zero emissions across its value chain. Please indicate where this information is available in **public reporting or corporate website**.

Target time frame	Target scope & related emission reduction target (as a percentage of base year emissions)	Is the target validated by Science Based Targets initiative?	Neutralizing residual emissions and mitigating beyond value chain
Base year Target year	☐ Scope 1 ☐ Scope 2 ☐ Scope 3 Some of the targets reported above are combined Dropdown menu: Scope 1 + 2 + 3 Scope 1 + 2 Scope 1 + 3	○ Yes ○ No, but the company has publicly committed to seek validation to the target by SBTi ○ No, but the company considers the target to be science-based ○ No, the target is not science-based	☐ The target includes purchasing carbon offset credits ☐ The target includes investing in permanent carbon removal

Question-Specific Guidance & Definitions

Net-zero commitment: A credible corporate net-zero commitment includes commitments to:

- Reducing Scope 1, 2, and 3 emissions to zero or to a level that is consistent with reaching net-zero emissions at the global or sector level in eligible 1.5 degrees C-aligned pathways.
- Neutralizing any remaining emissions that could not be reduced at the net-zero target year and any GHG emissions released into the atmosphere thereafter.

Science-based targets: According to the SBTi, targets are considered science-based if they are aligned with what the latest climate science deems necessary to meet the goals of the Paris Agreement on climate change – limiting global warming to well-below 2 degrees C above preindustrial levels and pursuing efforts to limit warming to 1.5 degrees C.

Science Based Targets initiative (SBTi): A global body that defines and promotes best practices in emissions reductions and net-zero targets in line with climate science. It provides technical assistance, expert resources to companies who set science-based targets, and independent assessment and validation of those targets. The SBTi process for target setting and validation is as follows:

- Committing to a science-based target via a letter of intent
- Developing a target in line with SBTi criteria
- Presenting target to SBTi for official validation (within two years of committing)
- Communicating this validation to stakeholders
- Reporting progress against these targets annually

Base year: Companies should use the same base year for near-term targets and long-term net-zero targets.

Target year: To limit global warming to 1.5 degrees C above pre-industrial levels we must reach net-zero GHG emission by 2050. Hence, companies are expected to set their own net-zero targets by 2050 or sooner.

Residual emissions: Emissions sources that remain after a company has included all technically or economically feasible emission reductions to their target.

Beyond value chain mitigation: Mitigation action or investments that fall outside a company's value chain. This includes activities outside of a company's value chain that avoid or reduce greenhouse gas emissions, such as carbon credits or other "offsetting", or measures that remove greenhouse gases from the atmosphere and permanently store them.

Data Requirements

- This question should only be answered if a near-term emission reduction target is reported in the previous question.
- We will not accept targets without a Target Year specified.

Target Scope & Related Emission Reduction Target (as a percentage of base year emissions):

- We require data on gross emissions targets as a percentage of the base year emissions before any deductions or other adjustments that consider offset credits, avoided emissions or reductions attributable to the sequestration of GHG.
- If you have a target that will be partly met by offsetting or CO2 removal, please report only the proportion of the target that relates to emissions reduction.

Industry-specific guidance:

(OGR/OGX/PIP/COL)

- SBTi does not accept emission reduction targets from oil and gas companies. Therefore, for the part 'Is the target validated by Science-Based Targets initiative?', we cannot accept any option other than 'No, the target is not science-based'

OIE - SBTi validated target will be accepted if the company derives less than 50% of revenue from:

- sale, transmission and distribution of fossil fuels
- providing equipment or services to fossil fuel companies

Please see the SBTi website for further details under 'What is the SBTi's policy on fossil fuel companies?'
https://sciencebasedtargets.org/sectors/oil-and-gas#what-is-the-sbtis-policy-on-fossil-fuel-companies

Disclosure Requirements

This question requires public evidence. We accept the company's own website and reporting, public CDP reports or information disclosed in the Science Based Targets initiative's website (https://sciencebasedtargets.org/companies-taking-action) as public evidence.

Standards & Frameworks

CDP 2025 - 7.5, 7.53, 7.54, 7.53.1, 7.53.2, 7.54.3
SFDR - A - Carbon Emission Reduction Initiatives
TNFD - Metrics and Targets C.
UNGC - G12, E1, E3.1, E3.1.1, E9

Net-Zero Transition Plan

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

Newly introduced in 2026

Applicable Industries

AIR, ALU, ARO, ATX, AUT, BLD, BTC, BVG, CHM, CMT, CNO, COL, COM, CON, COS, CSV, CTR, DHP, DRG, ELC, ELQ, FDR, FOA, FRP, GAS, HEA, HOM, HOU, ICS, IDD, IEQ, IMS, ITC, LEG, LIF, MNX, MTC, MUW, OGR, OGX, **OIE**, PIP, PRO, PUB, REI, REM, REX, RTS, SEM, SOF, STL, TCD, TEX, THQ, TLS, TOB, TRA, TRT, TSV

Question Rationale

A climate transition plan outlines a company's strategy for shifting its business model, operations and activities towards a lower-carbon economy, aligning with global climate goals such as limiting warming to 1.5 degrees C and achieving net-zero emissions by 2050. While many of the transition plans elements are covered in different questions across the Climate Strategy criterion, this question adds topics such as financing, decarbonization levers and engagement strategy.

A robust transition plan includes time-bound, quantified investment or funding targets, such as capital expenditure or operational expenditure allocations. It details key actions and decarbonization levers across the value chain, prioritizing near-term emission reductions in Scopes 1, 2, and 3. Stakeholder engagement is essential, encompassing suppliers, customers, industry peers, government, and civil society to drive progress. The plan should also address the social implications of the transition, assessing risks and outlining actions to support a just transition for workers, communities and consumers.

Question Layout

Does the company have a transition plan in place to align with global net-zero GHG emission goals?

- o Yes, the company has a transition plan in place to align with global net-zero GHG emission goals. Please indicate where this information is available in **public reporting or corporate website.**
  - ☐ Alignment with Paris-Agreement on climate change goal of limiting global warming to 1.5 degrees C
  - ☐ Quantified target for investments or funding to implement the transition plan
  - ☐ Planned key actions or decarbonization levers that will drive the progress towards meeting the company's emission reduction targets
    - ☐ Scope 1
    - ☐ Scope 2
    - ☐ Scope 3
  - ☐ Engagement with stakeholders to gather input and support the achievement of the transition plan
    - ☐ Value chain
    - ☐ Industry peers or relevant associations or initiatives
    - ☐ Government, public sector or civil society
  - ☐ Assessment of social implications of the transition plan and corresponding actions

Question-Specific Guidance & Definitions

Transition Plan: A climate transition plan is a company's strategic roadmap detailing how it intends to adjust its strategy, business model, operations and activities to transition towards a lower-carbon economy and align with climate goal such as limiting global warming to 1.5°C and reaching global net-zero emissions by 2050.

Alignment with Paris agreement: To demonstrate strategic ambition, the transition plan should be aligned with the Paris agreement goal of "holding the increase in the global average temperature to well below 2°C above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5°C above pre-industrial levels" (article 2), and/or with the latest climate science. Please note that it is not sufficient that the company's climate targets are science-based (as this is covered in the questions Emissions Reduction Targets, Net-Zero Commitment question).

Quantified targets for investments or funding: This refers to disclosure of time-bound, quantified targets detailing how the company plans to fund the activities set out in its transition plan, such as planned annual investments or planned overall investments for a given time-horizon.Planned CapEx or OpEx, with reference to the time horizon, and aligned with the implementation of the transition plan or aligned with the EU Taxonomy is acceptable. However, alignment with the EU Taxonomy is not required.

Key actions or decarbonization levers: This refers to actions across the company's value chain that drive the company's climate change mitigation and the achievement of the transition plan. These should include concrete actions to reduce emissions in Scopes 1, 2 and 3 with an emphasis on the near-term (next five years).

Engagement with stakeholders: A description of how the company is engaging with its stakeholders to support the achievement of its transition plan, covering the following stakeholder groups:

- **Value chain:** Engagement activities with value chain such as suppliers, customers or investee companies.
- **Industry peers or relevant associations or initiatives:** Engagement or collaborative activities undertaken to influence industry counterparts, membership bodies or industry associations
- **Government, public sector or civil society:** Engagement activities with government, public sector organization, communities or civil society to drive the transition towards a lower-carbon economy

Assessment of social implications of the transition plan and corresponding actions: This involves the consideration of the social implications of a transition to a low carbon society. The transition in different sectors may have significant implications for workers in a company's own operations and supply chains, for communities or consumers. A transition plan should cover an assessment of these potential social impacts and planned or implemented actions to address social risks and contribute to a just transition. In this context a just transition is defined as decarbonizing economic activities while ensuring fairness, equity and the protection of human rights for all people. If the assessment does not result in any social risks, then no actions are expected to be reported.

Data Requirements

The plan may be presented as a stand-alone document or integrated within annual or sustainability reports, and may also be titled as a decarbonization plan, climate action plan, net-zero strategy or similar. This question should only be answered if the company reports a time-bound net-zero or carbon neutrality commitment in the question Net-Zero Commitment.

If the company did not answer this question, the "Net-Zero Transition Plan" question should be answered "No, the company does not publicly report on a net-zero transition plan".

Disclosure Requirements

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

Any response that cannot be verified in the attached public document(s) will not be accepted.

References

Transition Plan Taskforce Disclosure Framework

Standards & Frameworks

CDP 2025 - 5.2, 7.55, 5.11, 7.53.1, 7.53.2, 7.55.1, 7.55.2

UNGC - E3

Biodiversity

Biodiversity forms the foundation for all of life. It plays a critical role in maintaining the quality, quantity, and resilience of ecosystems and provides services that the planet relies upon. Businesses have long utilized nature's resources and services without having to pay a full price for the privilege. The externalities of these actions have brought us to a turning point—either continue elevated levels of dependency and impact on nature or follow a path to a more holistic approach. The world—humans, businesses, economies—face a risk of collapse if we continue to exceed nature's boundaries. The only foreseeable option is a transformative path where businesses deeply consider their relationship with nature and work collaboratively with stakeholders to achieve mutually beneficial outcomes.

This criterion focuses on the ability of companies to recognize the importance of biodiversity and the impact- and dependency-related risks and opportunities. Risks must be identified in order to alleviate pressure on ecosystems and to help them thrive, while still working within the parameters of business operations. This criterion also seeks a high-level of industry collaboration with external stakeholders—to create meaningful policies, operate within supply chains and to transform existing systems.

Biodiversity Risk Assessment

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

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

AIR, ALU, ARO, ATX, AUT, BLD, BTC, BVG, CHM, CMT, CNO, COL, COM, CON, COS, CTR, DHP, DRG, ELC, ELQ, FDR, FOA, FRP, GAS, HOM, HOU, ICS, IDD, IEQ, ITC, MNX, MTC, MUW, OGR, OGX, **OIE**, PIP, REI, REM, REX, RTS, SEM, STL, TEX, THQ, TLS, TOB, TRA, TRT

Question Rationale

This question will determine to what extent companies are taking stock of biodiversity risks. Biodiversity forms the foundation for all of life. Businesses have long utilized nature's resources without having to pay a full price for the privilege. The externalities of these actions have brought the planet to a turning point - Businesses will either have to continue elevated levels of dependency and impacts on nature or follow a more holistic approach. The world - including humans, businesses and economies—faces a risk of collapse if we continue to exceed nature's boundaries. The only foreseeable option is asking businesses to deeply consider their relationship with nature and work collaboratively with stakeholders to achieve mutually beneficial outcomes.

This question focuses on the ability of companies to recognize the importance of biodiversity and related risks and opportunities. This includes identifying risks to alleviate pressure on ecosystems while working within the parameters of business operations. This risk assessment should be used to inform a company-wide risk management process, ideally through a location-specific approach. This question also asks for a high level of industry collaboration with external stakeholders — where meaningful processes are created; upstream and downstream activities operate sustainably; and existing systems are transformed.

Question Layout

Does the company assess dependency- and impact-related biodiversity risks covering all its relevant activities?

○ Yes, the company assesses dependency- and impact-related biodiversity risks and it covers the following aspects:
Process description
Describe the processes used for identifying and assessing dependency- and impact-related biodiversity risks covering the elements below. Please indicate where this information is available:

Process description		Public reporting	
☐	Use of location-specific approach	☐	Yes
☐	References to methodologies or frameworks used for assessment	☐	Yes
☐	Integrated into multi-disciplinary company-wide risk management processes	☐	Yes
☐	Dependency-related biodiversity risks considered in risk assessment	☐	Yes
☐	Impact-related biodiversity risks considered in risk assessment	☐	Yes

Scope of biodiversity risk assessment

Please define the scope of the company's biodiversity risk assessment. Please indicate where this information is available:

Scopes		Public reporting	
☐	Own operations	☐	Yes
☐	Adjacent areas to own operations	☐	Yes
☐	Upstream activities	☐	Yes
☐	Downstream activities	☐	Yes

Risks identified

Please indicate if biodiversity risks were identified and where this information is available:

Risks identified		Public reporting	
○	Biodiversity-related risks identified	☐	Yes
○	No biodiversity-related risks		
○	Not known		

Question-Specific Guidance & Definitions

Location-specific approach: Refers to dependencies or impacts that occur at a particular place in a company's value chain.

Methodologies and frameworks: Methodology refers to a system used to assess biodiversity-related risks and gauge the reliability of the assessment. A framework provides a structure intended to guide the development of an assessment. Frameworks are intended to assure stakeholders that the biodiversity assessment is guided by a reliable foundation. Acceptable methodologies may include:

- Taskforce on Nature-related Financial Disclosures (TNFD) Locate, Evaluate, Assess and Prepare (LEAP) nature risk assessment approach
- Integrated Biodiversity Assessment Tool (IBAT)
- Species Threat Abatement and Restoration (STAR) metric
- Natural Capital Finance Alliance's Encore
- World Wide Fund for Nature (WWF) Biodiversity Risk Filter

Impact: Represents the positive or negative effects a company has on the state of nature. Examples include the pollution of air, water or soil; the fragmentation or disruption of systems and natural habitats; and the alteration of ecosystems.

Dependency: Aspects of nature's contributions to people that a person or organization relies on to function. Examples include water flow and quality regulation; regulation of hazards such as floods and fires; pollination; and carbon sequestration.

Own operations: Includes any business activity that directly impacts natural capital through its operations such as employees, business, subsidiaries, products and services, business units, regions, sites, plants and facilities. This also includes indirect impacts that depend on critical commodities in its supply chain. Such operations include production, extraction, plantation, construction, power generation, transmission or development activities.

Adjacent areas: Value chain sites that are adjacent (between 0 km and 2 km from the nearest site) to landscapes, seascapes and watersheds critical to biodiversity.

Upstream activities: Activities that include operations related to the initial stages of producing a good or service. Examples include material sourcing, material processing and supplier activities. This includes stakeholders such as brokers, consultants, contractors, distributors, franchisees or licensees, home workers, independent contractors, manufacturers, primary producers, subcontractors, tier 1 and 2 suppliers, and wholesalers.

Downstream activities: Activities that include operations related to processing materials into a finished product and delivering it to the end user, such as transportation, distribution and consumption.

Data Requirements

This question may be marked "The question is not applicable to the company" for companies that can credibly demonstrate in a comprehensive comment that their company has:

- No impact on biodiversity in its own operations
- No impact on biodiversity in its key raw material supply chains
- No impact at the use-phase or end-of-life of its products/services
- No financing activities that impact or depend on biodiversity

Industry-Specific Guidance:

Utilities (ELC, GAS, MUW)

- ELC & GAS: Utilities that have no power generation or transmission businesses or are only in electricity/gas distribution should mark "The question is not applicable to the company" and provide an explanation in the comment box.
- MUW: Pure water utilities should mark "The question is not applicable to the company" and provide an explanation in the comment box.

Real Estate (REI and REM)

- Companies that have not marked "Development of major renovation and new construction" as one of the main activities of the business in the question "0.1 Denominator Area" should mark "The question is not applicable to the company".
- Companies that have marked "Development of major renovation and new construction" as one of their main activities in question "0.1 Denominator Area" but are only operating in urban environments should mark "The question is not applicable to the company" and provide an explanation in the comment box.

Consumer Discretionary (CNO, REX, TRT)

Companies in the following industries that only provide online services should mark "The question is not applicable to the company" and provide an explanation in the comment box.

- CNO Casinos & Gaming
- REX Restaurants & Leisure Facilities
- TRT Hotels, Resorts & Cruise Lines

Industrials (ICS)

Companies that are not involved in waste management activities should mark "The question is not applicable to the company" and provide an explanation in the comment box.

Disclosure Requirements

Additional credit will be granted for the public disclosure of the section elements listed below:

Process description

- Use of location-specific approach
- References to methodologies or frameworks used for assessment
- Integrated into multi-disciplinary company-wide risk management processes
- Dependency-related biodiversity risks considered in risk assessment
- Impact-related biodiversity risks considered in risk assessment

Scopes

- Own operations
- Adjacent areas to own operations
- Upstream activities
- Downstream activities

Risk identified

- All options need to be verifiable from public documents.

References

TNFD- LEAP: https://framework.tnfd.global/the-leap-nature-risk-assessment-process/evaluate/identification-environmental-assets/

Nature Positive: https://naturepositive.com/baseline-biodiversity-assessments/

Integrated Biodiversity Assessment Tool (IBAT): https://www.ibat-alliance.org/

Natural Capital Finance Alliance's Encore: https://encore.naturalcapital.finance/en

STAR (Species Threat Abatement and Restoration Metric): https://www.iucn.org/resources/conservation-tool/species-threat-abatement-and-recovery-star-metric

WWF Risk Biodiversity Filter: https://wwwwwfse.cdn.triggerfish.cloud/uploads/2022/05/wwf-a-biodiversity-guide-for-business.pdf

Standards & Frameworks

CDP 2025 - 2.2, 2.2.1, 2.2.2, 8.9.3, 8.9.4

TNFD - Governance A., Strategy A., Risk Management A(i), Risk Management A(ii), Annex 2 - A25.0 Dependency, impact, risk and opportunity management - Dependency, impact, risk and opportunity assessment

EU Taxonomy - Appendix D

UNGC - G4, G5

Biodiversity Commitment

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

AIR, ALU, ARO, ATX, AUT, BLD, BTC, BVG, CHM, CMT, CNO, COL, COM, CON, COS, CTR, DHP, DRG, ELC, ELQ, FDR, FOA, FRP, GAS, HOM, HOU, ICS, IDD, IEQ, ITC, MNX, MTC, MUW, OGR, OGX, **OIE**, PIP, REI, REM, REX, RTS, SEM, STL, TEX, THQ, TLS, TOB, TRA, TRT

Question Rationale

The purpose of this question is to evaluate the disclosure of a company's public policy or commitment to biodiversity, covering aspects to systematically address its dependency and impact-related biodiversity risks. This includes commitments to engage with stakeholders, conduct risk assessments, disclose identified priorities and set targets to work toward no net loss. Companies are expected to disclose the mitigating actions they take and set a long-term net positive impact commitment. All aspects covered are expected to be applied to a company’s entire value chain and be endorsed by either a member of the board of directors or executive management.

Question Layout

Does the company have a commitment on biodiversity and is it available publicly?

- ○ Yes the company has a commitment on biodiversity. Please indicate where this information is available in **public reporting or corporate website.**

  Commitment aspects

  The commitment covers the following aspects:

  - ☐ Achievement of a net positive impact (NPI) on biodiversity

    Please indicate the target year:

  - ☐ Definition of biodiversity-related targets for priority areas to work towards no net loss
  - ☐ Commitment required of value chain to avoid operational activities near sites containing globally or nationally important biodiversity
  - ☐ Application of a mitigation hierarchy
  - ☐ Conducting a biodiversity risk assessment
  - ☐ Engagement with stakeholders on biodiversity

  Scope of commitment

  Which parts of operations, corporate processes and supply chain are covered by the biodiversity commitment?

  - ☐ Own operations
  - ☐ Suppliers
  - ☐ Partners

  Policy endorsement

  - ☐ Please select the highest endorsing decision-making body
    - ○ Board of directors
    - ○ Executive management

Question-Specific Guidance & Definitions

Net positive impact (NPI): A commitment aligned with the Post-2020 Global Biodiversity Framework" for outcomes in which the impacts on biodiversity across a company's value chain are stabilized by 2030. Net positive impact allows for the recovery of natural ecosystems in the next 20 years with net improvements by 2050 to achieve the Convention on Biological Diversity's vision of "living in harmony with nature by 2050."

Mitigation hierarchy: A framework to help companies minimize negative impacts on nature with a long-term outlook. This prioritized approach guides companies to avoid, limit or reduce impacts on nature, and to hold themselves accountable for restoring areas and ecosystems adversely impacted by business operations. Additionally, the option to offset aims to compensate for any residual, adverse impacts after full implementation of the previous three steps of the mitigation hierarchy. Building on this, companies might take transformative actions to address the socio-economic systems of organizations that accelerate biodiversity loss.

Targets to work towards no net loss: Must be linked to a company's biodiversity commitment/strategy and reduce dependency- and impact-related biodiversity risks for priority areas identified through the biodiversity risk assessments.

Targets may be related to:

- Avoidance or reduction of sourcing from areas of critical biodiversity
- Reduction of land use change (e.g., deforestation)
- Reduction of resource exploitation (e.g., water use in water-stressed areas, fisheries with stocks outside biologically sustainable levels)
- Restoration or regeneration in critical value chain locations related to ecological integrity, connectivity, soil quality, etc.
- Compensation through reforestation programs or creation of protected areas or reserves

No net loss (NNL): Defined as the point at which project-related impacts on biodiversity are balanced by measures to avoid and minimize the project's impacts, undertake on-site restoration, and offset significant residual impacts on an appropriate geographical scale (e.g., local, landscape-level, national, regional).

Priority areas: Identified based on risk assessment data on dependencies and impacts across a company's value chain to determine the relative contribution of different locations to a company's overall biodiversity-related risk exposure. Criteria for identifying priority areas may include:

- High-priority sites, inputs, or product lines based on environmental and financial materiality.
- Contribution of different locations, commodities and suppliers to the total impact of the company
- State of nature in value chain locations
- Needs of value chain stakeholders, such as dependency on ecosystem services

Risk assessment: Businesses should carry out risk assessments of their dependencies and impacts on biodiversity and ecosystem services. Examples include global risk mapping that allows companies to identify operations with a high degree of exposure to potential biodiversity and ecosystem service risks, and site-level risk assessments, aimed at mitigating potential environmental and social risks.

Stakeholders: Persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome. Examples of stakeholder engagement may include:

- Creation of a biodiversity strategy through collaboration with experts such as consultants and non-governmental organizations) to create their own biodiversity strategy
- Suppliers
- Local community engagement
- NGOs on specific conservation or restoration projects
- Investee companies

Natural capital: Another term for the stock of renewable and non-renewable natural resources on earth (e.g., plants, animals, air, water, soils, minerals) that combine to yield a flow of benefits or "services" to people. These flows can be ecosystem or abiotic services, which provide value to businesses and to society.

Ecosystem services: Defined as the direct and indirect contributions of ecosystems to human wellbeing. These services have an impact on survival and quality of life. There are four types of ecosystem services: provisioning (oil, timber, fiber, etc.), regulating (pollination, flood control, climate regulation, etc.), cultural (recreation, aesthetic values) and supporting services (photosynthesis, water/nutrient cycles, etc.).

Abiotic services: These services benefit people and do not depend on ecological processes but arise from fundamental geological processes and include the supply of minerals, metals, and oil and gas, as well as geothermal heat, wind, tides, and the annual seasons.

Biodiversity: The total variety of Earth's species, their genetic information, and the ecosystems they form. Biodiversity is critical to the health and stability of natural capital as it provides resilience to shocks such as floods and droughts, and it supports fundamental processes such as the carbon and water cycles and soil formation. Biodiversity is a part of natural capital and underpins ecosystem services.

Critical commodities: Raw materials that have either been extracted (i.e., hard commodity) or grown (i.e., soft commodity). These critical commodities have a significant impact on biodiversity in their production process or depend on functioning biodiversity to achieve an optimal output. Examples of such critical commodities, such as those defined by the EU's rules for deforestation-free products, may include:

- Beef
- Wood
- Palm oil
- Soya
- Coffee
- Cocoa

Additionally, considering their high potential impact on biodiversity, we consider rubber and cotton as potential supply chain risks.

Areas: Refers to land, sea, or other natural environments that are used, owned, leased, operated, or permitted by a company.

Site proximity: Value chain sites that either contain (i.e., overlapping) or are adjacent (between 0km and 2km from the nearest site) to landscapes, seascapes, and watersheds critical to biodiversity.

Sites containing globally or nationally important biodiversity: Also referred to in the criteria as “critical biodiversity”. These include:

- Species classified as critically endangered, endangered, or vulnerable on the International Union for Conservation of Nature (IUCN) Red List, endemic species.
- Internationally recognized areas: World Heritage sites, Ramsar Wetlands, UNESCO Man and the Biosphere Programme (MAB), biodiversity hotspots
- Nationally important biodiversity such as legally protected areas, habitats, and species.

Companies are expected to have a position or commitment on biodiversity and the impact of their operations, even if they do not currently operate in sites containing globally or nationally important biodiversity.

Own operations: A company's employees, business, subsidiaries, products and services, business units, regions, sites, plants and facilities

Suppliers: Includes brokers, consultants, contractors, distributors, franchisees or licensees, home workers, independent contractors, manufacturers, primary producers, sub-contractors, tier-1 and 2 suppliers, and wholesalers.

Partners: Include agents, lobbyists and other intermediaries, joint venture and consortia partners, customers and clients

Data Requirements

This question may be marked "The question is not applicable to the company" for companies that can credibly demonstrate in a comprehensive comment that it has:

- No impact on biodiversity in its own operations
- No impact on biodiversity in its key raw material supply chains
- No impact at the use-phase or end-of-life of products/services
- No financing activities that impact or depend on biodiversity

Industry-specific Guidance:

Utilities (ELC, GAS, MUW)

- ELC & GAS: Utilities that have no power generation or transmission business or are only in electricity/gas distribution should mark "The question is not applicable to the company" and provide an explanation in the comment box.
- MUW: Pure water utilities should mark "The question is not applicable to the company" and provide an explanation in the comment box.

Real Estate (REI and REM)

Companies that have not marked 'Development of major renovation and new construction' as one of the main activities of the business in question '0.1 Denominator Area' should mark "The question is not applicable to the company"

Companies that have marked 'Development of major renovation and new construction' as one of the main activities of the business in question '0.1 Denominator Area' but are only operating in urban environments should mark "The question is not applicable to the company" and provide an explanation in the comment box.

Consumer Discretionary (CNO, REX, TRT)

Companies in the following industries that only provide online services should mark "The question is not applicable to the company" and provide an explanation in the comment box.

- CNO Casinos & Gaming
- REX Restaurants & Leisure Facilities
- TRT Hotels, Resorts & Cruise Lines

Industrials (ICS)

Companies in the Commercial Services and Supplies (ICS) industry that are not involved in waste management activities should mark "The question is not applicable to the company" and provide an explanation in the comment box.

Disclosure Requirements

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

Information should be available in a policy document or separate section in company report or website. Information, which is scattered, or weak, or unclear commitments (e.g., consider, evaluate, encourage, may, etc.) will not be accepted.

References

Natural Capital Coalition: www.naturalcapitalcoalition.org/protocol

Science-based Targets for Nature (SBTN) Initial Guidance for Business: https://sciencebasedtargetsnetwork.org/wp-content/uploads/2020/09/SBTN-initial-guidance-for-business.pdf

Taskforce on Nature-related Financial Disclosures (TNFD) Nature In Scope: https://tnfd.global/wp-content/uploads/2021/07/TNFD-Nature-in-Scope-2.pdf

European Supervisory Authorities (ESAs) Joint Committee (JC) draft Regulatory Technical Standards (RTS) on non-financial disclosures: https://www.esma.europa.eu/sites/default/files/library/jc_2021_03_joint_esas_final_report_on_rts_under_sfdr.pdf

UN Convention on Biological Diversity: https://www.cbd.int

Convention on International Trade in Endangered Species of Wild Fauna and Flora: https://www.cites.org/

UNESCO World Heritage Centre: https://whc.unesco.org/

International Union for Conservation of Nature: https://www.iucn.org/

International Council on Mining & Metals (ICMM) guidance: https://www.icmm.com/en-gb/publications/biodiversity/mining-and-biodiversity-good-practice-guidance

International Petroleum Industry Environmental Conservation Association (IPIECA): https://www.ipieca.org/resources/good-practice/biodiversity-and-ecosystem-services-fundamentals/

Cross-Sector Biodiversity Initiative (CSBI) guidance: http://www.csbi.org.uk/

Cement Sustainability Initiative (CSI) guidance: https://www.wbcsd.org/contentwbc/download/3055/38872/1

Post-2020 Global Biodiversity Framework: https://www.cbd.int/article/draft-1-global-biodiversity-framework

Standards & Frameworks

CDP 2025 - 4.6, 11.2, 11.11, 11.11.1, 4.10, 4.6.1, 8.16.1
EU Taxonomy - Appendix D
SFDR - A - Natural Species and Protected Areas
TNFD – Governance A., Governance B., Strategy B., Risk Management A(i), Metrics and Targets C., Annex 2 - A20.1 Strategy - Engagement**UNGC** – G2, G3, G3.1, E1, E1.1, E3.1, E3.1.1

No Deforestation Commitment

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

AIR, ALU, ARO, ATX, AUT, BLD, BTC, BVG, CHM, CMT, CNO, COL, COM, CON, COS, CTR, DHP, DRG, ELC, ELQ, FDR, FOA, FRP, GAS, HOM, HOU, ICS, IDD, IEQ, ITC, MNX, MTC, MUW, OGR, OGX, **OIE**, PIP, REI, REM, REX, RTS, SEM, STL, TEX, THQ, TLS, TOB, TRA, TRT

Question Rationale

No-deforestation commitments are voluntary sustainability initiatives adopted by companies to signal the intention to end all deforestation in their supply chains. No-deforestation commitments that have immediate deadlines and clear sanction-based implementation mechanisms in biomes with a high risk of forest commodity conversion can be effective in achieving deforestation-free value chains. Engagement with external stakeholders and the supply chain exposed to deforestation risks, as well as the monitoring and disclosure of compliance, further support the effective implementation of no-deforestation commitments.

Question Layout

Does the company have a commitment on no-deforestation and is it available publicly?

- Yes the company has a commitment on no-deforestation. Please indicate where this information is available in **public reporting or corporate website.**

  Extent of commitment

  Please indicate the extent of the commitment to no-deforestation:

  - End all deforestation (no gross deforestation)
  - Compensate with future reforestation (no net deforestation)

  The targets are time-bound. Planned year for full implementation:

  Scope of commitment

  Which parts of operations, corporate processes and supply chain are covered by the no-deforestation commitment?

  - ☐ Own operations
  - ☐ Suppliers
  - ☐ Partners

  Commitment endorsement

  - ☐ Please select the highest endorsing decision-making body:
    - Board of directors
    - Executive management

Question-Specific Guidance & Definitions

No gross deforestation: Also referred to as zero or zero-gross deforestation. This refers to voluntary commitments to stop or reduce all deforestation associated with commodities produced, traded, and/or sold.

No net deforestation: Also referred to as zero-net deforestation, these are promises of future reforestation to compensate current forest loss, while future implementation deadlines allow for preemptive clearing.

Scope of commitment: Effective commitments to end deforestation must cover all products and services, and be applicable to all suppliers and partners. Failure to indicate complete coverage and applicability to the value chain results in uncertainty.

Own Operations: A company's employees, businesses, subsidiaries, products and services, business units, regions, sites, plants and facilities.

Suppliers: Include brokers, consultants, contractors, distributors, franchisees or licensees, home workers, independent contractors, manufacturers, primary producers, sub-contractors, tier-1 and 2 suppliers, and wholesalers.

Partners: Includes agents, lobbyists and other intermediaries, joint ventures and consortia partners, customers and clients.

Commitment and oversight: A statement that the commitment/policy is approved, overseen, reviewed, or adopted by the board of directors or executive management. A policy can also be signed by the respective director.

Data Requirements

This question may be marked "The question is not applicable to the company" for companies that can credibly demonstrate in a comprehensive comment that it has:

- No impact on deforestation in its own operations
- No impact on deforestation in its key material supply chains
- No impact on deforestation through its partner relationships

Industry-specific Guidance

Utilities (ELC, GAS, MUW)

- ELC & GAS: Utilities that have no power generation or transmission business or are only in electricity/gas distribution should mark "The question is not applicable to the company" and provide an explanation in the comment box.
- MUW: Pure water utilities should mark “Not applicable” and provide an explanation in the comment box.

Real Estate (REI and REM)

- Companies that have not marked "Development of major renovation and new construction" as one of the main activities of the business in question "0.1 Denominator Area" should mark "The question is not applicable to the company".
- Companies that have marked "Development of major renovation and new construction" as one of the main activities of the business in the question "0.1 Denominator Area" but only operate in urban environments should mark "The question is not applicable to the company" and provide an explanation in the comment box.

Consumer Discretionary (CNO, REX, TRT)

Companies in the following industries that only provide online services should mark "The question is not applicable to the company" and provide an explanation in the comment box.

- CNO Casinos & Gaming
- REX Restaurants & Leisure Facilities
- TRT Hotels, Resorts & Cruise Lines

Industrials (ICS)

Companies in the Commercial Services and Supplies (ICS) industry that are not involved in waste management activities should mark "The question is not applicable to the company" and provide an explanation in the comment box.

Disclosure Requirements

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

Standards & Frameworks

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

Standards & Frameworks

CDP 2025 - 4.6, 8.7, 4.6.1, 8.7.1
EU Taxonomy - 1.1. Afforestation - DNSH - (6), 1.2. Rehabilitation and restoration of forests, including reforestation and natural forest regeneration after an extreme event - DNSH - (6), 1.3. Forest management - DNSH - (6), 1.4. Conservation Forestry - DNSH - (6)
SFDR - A - Deforestation
TNFD - Strategy B., Metrics and Targets C.
UNGC - E1, E1.1, E3.1, E3.1.1

Product Stewardship

Advancing towards a sustainable economy means growth in employment and income are driven by public and private investment into such economic activities, infrastructure and assets that allow good quality of life for people, reduced carbon emissions and pollution, enhanced resource efficiency, and prevention of the loss of biodiversity and ecosystem services. Transforming our economy is a challenge that requires bold leadership and a strong commitment to action, yet it also provides opportunities for companies to develop sustainable products or services that satisfy a growing customer sentiment.

Managing the impacts of products throughout the full life cycle is a major concern for stakeholders. Integration of sustainable practices into processes, products and the development of new products reflects an understanding of sustainability challenges and demonstrates the ability of the company to capitalize on market opportunities of a sustainable economy and minimize market risk at the product level.

Product stewardship processes add value to products by minimizing the risk of harm both to people and the environment, thereby reducing potential liabilities. The criterion focuses on Life Cycle Analysis (LCAs), product design, maintenance, take-back schemes (including e-waste), reuse in manufacturing processes, customer information and initiatives to promote product stewardship amongst stakeholders.

The criterion also assesses the company's resource efficiency and circularity across business operations as producing more with less material is essential for many industries affected by the increasing scarcity of natural resources. Resource efficiency and circularity can enhance companies' competitiveness through reduced costs and environmental liabilities. It can also mean companies are better prepared for future environmental regulations.

And finally, this criterion assesses companies' and industries' sustainable revenues across all business activities.

Sustainable Revenues

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

Assessment Focus

Change from Last Year

Changed from 2025

Applicable Industries

AIR, ALU, CHM, CNO, COL, COS, CSV, CTR, ELC, GAS, ICS, IMS, MNX, MUW, OGR, OGX, **OIE**, PIP, PRO, PUB, REX, RTS, SEM, SOF, STL, TCD, TEX, TLS, TRA, TRT, TSV

Question Rationale

The transition to a sustainable economy requires solutions that promote decarbonization and the wise use of resources without straining ecosystems. Sustainable revenue is a metric suitable for comparing the output of companies across industries, and it also provides market transparency. Companies that demonstrate an increasing trend in sustainable revenues are better positioned to enter a resource-constrained world and to gain a competitive advantage.

The purpose of this question is to assess the revenues generated by a company's products and/or services that are considered "sustainable" over the last four years. The data captured shows if and how many companies are focusing efforts on inclusive and holistic growth within its portfolio.

Question Layout

Does the company track its revenues from sustainable products or services?

- Yes, the company tracks its revenues from sustainable products or services. Please indicate where this information is available.

  Currency:

Revenues from	FY 2022	FY 2023	FY 2024	FY 2025
Sustainable revenues				
☐ Description:				
Total revenues				
Percentage of sustainable revenues				

☐ The data is publicly available.
☐ The data differs from its publicly reported figures. Please provide an explanation:

Question-Specific Guidance & Definitions

Sustainable revenue: A product or service or a group/family of products or services that contribute towards one of the following categories constitute as sustainable revenues:

- Climate change mitigation
- Climate change adaptation
- Sustainable use and protection of water resources
- Transition to a circular economy
- Pollution prevention and control
- Biodiversity and ecosystem protection

This approach aligns with the **"substantial contribution" criteria** outlined in the EU Taxonomy and specifies products or services which substantially contribute to a green economy. The EU Taxonomy is a classification system which establishes clear definitions of what sustainable products or services are, compared to "conventional" products or services. We primarily align with the EU Taxonomy because the "substantial contribution" criteria were worked out in close collaboration with industry experts, and the taxonomy covers a wide range of business activities that reach beyond most other current taxonomies. Furthermore, the criteria are well defined, and the **alignment** is linked to quantitative improvements. Please note that we consider **alignment** with the following taxonomies as acceptable because they are considered similarly rigorous as the EU taxonomy:

- ASEAN Taxonomy (only Green or Tier 1)
- Australian Taxonomy (only Green or Tier 1)
- Colombia Green Taxonomy
- (EU - China) Common ground Taxonomy
- Hong Kong Taxonomy
- Mexican Taxonomy
- Singapore-Asia Taxonomy (SAT) (only Green or Tier 1)
- South African Taxonomy
- Taiwan Sustainable Taxonomy

For Asian or Australian companies, please note that alignment with the transition-type "Amber", "Orange" or Tier 2 category is not accepted.

While only companies based or operating in the EU (or other mandatory taxonomies) are legally required to report such information, it is still expected that companies outside these jurisdictions also report on revenues from sustainable business activities (products or services), just as a company may voluntarily report against the CDP or TCFD. Please see 'Data Requirements' section below for more details on how we expect companies to fill in this question.

For more detailed information, please visit the EU Taxonomy Activities website and check the **"substantial contribution" criteria** for a given product or service to see which requirements must be fulfilled: https://ec.europa.eu/sustainable-finance-taxonomy/activities

References to the other acceptable taxonomies are provided in the "Reference" section.

Note: Sustainable activities undertaken for internal use (e.g., solar energy for manufacturing or offsetting) must not be considered as this question only assesses the company's revenue-generating products and services.

Data Requirements

Product/Service description: A clear and concise description of the products/services that generate sustainable revenues is expected. Note that we expect the description to:

- **1. Reference to the business activity** the company contributes to, as defined in the EU Taxonomy (e.g., "Cogeneration of heat/cool and power from solar energy", "Manufacture of iron and steel" or "Data processing, hosting and related activities") as used in https://ec.europa.eu/sustainable-finance-taxonomy/activities.
  Alternatively, a reference to the "green" business activity of any of the alternative taxonomies (see list above) can be used (Tier 1 or "green" only).
- **2. Specific:** The description and/or supporting evidence must clearly articulate the products/services that are producing sustainable revenues. This could be individual products/services or product/service lines or groups. It may also be a specific operating segment of the business. General terms will not be accepted, as this question looks for clear and thoughtful products/services that have been added to a business portfolio to contribute a sustainable economy.
- **3. Refer to thresholds (if necessary):** If a sustainable revenue-generating product or service requires thresholds to be considered "sustainable" (compared to "conventional" product), the thresholds that the company adheres to **must be explained in reporting or the "Product/Service description" text box.**

For example, if the company manufactures carbon black, the EU Taxonomy defines this as sustainable if the GHG emissions from the production processes are lower than 1,141 tCO2e per tonne of product. This threshold information is necessary to qualify the product as sustainable or "green".

However, if the company publicly reports these revenues are aligned with the EU Taxonomy, and which products/services these are from, this will suffice.

Descriptions that are not specific (and do not refer to acceptable thresholds if necessary) will not be accepted. As a result, the entered revenues will also not be accepted.

Revenues: Enter in the revenues generated from sustainable products/services over the last 4 years. If the product/service description does not meet expectations or is left blank, the revenues will not be considered.

Example 1:
Product/Service description: EU Taxonomy Business Activity "**Manufacture of carbon black**". The company manufactures carbon black for tires, plastics and coatings with a focus of minimizing gas emissions and enhancing product quality. The GHG emissions from production processes are 1,000 tCO2e per tonne of product.

Sustainable Revenues: FY 2021- $10,000,000 | FY 2022- $15,000,000 | FY 2023- $12,000,000 | FY 2024- $17,000,000

Example 2:
Product/service description: EU Taxonomy Business Activity **"Hotels, holiday, camping grounds and similar accommodation"**. The company owns boutique hotels which cater to adventure tourism. The company operates treks for its guests through national parks in Chile, Argentina and Costa Rica, where permit fees are required. The company has 10-year contractual agreements where it contributes 0.9% of the annual turnover of these establishments with the organizations in charge of the conservation for these areas. There are defined action plans, an environmental management system and a completed environmental impact assessments for each of our operating sites, and we audit our operations every 3 years.

Sustainable Revenues: FY 2021- $4,000,000 | FY 2022- $6,000,000 | FY 2023- $ 6,500,000 | FY 2024- $7,000,000

The information has been pre-filled using other S&P Global data sources and has been derived from public information, when available. If necessary, please update the figures and provide relevant references outlining the underlying definitions and methodology. This question is applicable to all industries assigned to this question; therefore, it is expected to be answered. If a company's main revenue- generating activity is not sustainable, best practice includes diversifying revenue streams to increase sustainable revenues.

Disclosure Requirements

Additional credit will be granted for relevant publicly available evidence covering the following aspect of this question:
Sustainable Revenues for at least one of the two most recent reported years.
Supporting evidence:

The document(s) you attached will be used to verify the qualitative part of your response. If a question text field is available, a comprehensive answer in that field can be accepted instead of a supporting document. Any qualitative response that cannot be verified in the attached document(s) or via the information provided in the related question text field (if available) will not be accepted. Quantitative figures provided in the response do not need supporting evidence, given the qualitative portion is accepted. You may still provide a reference using the reference clip. This could include examples of the underlying calculations or approaches to data aggregation used to compile the provided quantitative information. The supporting document does not need to be available in the public domain.

References

ASEAN Taxonomy: https://www.sfinstitute.asia/wp-content/uploads/2025/11/ASEAN-Taxonomy-Sustainable-Finance-V4_06Nov25.pdf
Australian Taxonomy: https://static1.squarespace.com/static/6182172c8c1fdb1d7425fd0d/t/685c723f6f294d5daf42c9df/1752447488069/Australian+Sustainable+Finance+Taxonomy+-+Version+1.pdf
Colombia Green Taxonomy: https://www.taxonomiaverde.gov.co/documents/316219/336660/Taxonom%C3%ADa+Verde+de+Colombia.pdf/f25c7843-9a15-17da-90f9-5d63763b85b6?t=1649352720000
(EU China) Common Ground Taxonomy: https://finance.ec.europa.eu/document/download/6a2df4d7-887a-40fe-9b09-b63394c656db_en?filename=241113-common-ground-taxonomy-instruction-report_en.pdf
EU Taxonomy: https://ec.europa.eu/sustainable-finance-taxonomy/activities/activity/276/view
EU Taxonomy: https://ec.europa.eu/sustainable-finance-taxonomy/
Hong Kong Taxonomy: https://brdr.hkma.gov.hk/eng/doc-ldg/docId/getPdf/20240503-3-EN/20240503-3-EN.pdf
Mexican Taxonomy: https://www.gob.mx/cms/uploads/attachment/file/809773/Taxonom_a_Sostenible_de_M_xico_.pdf
Singapore-Asia Taxonomy: https://www.mas.gov.sg/-/media/mas-media-library/development/sustainable-finance/singaporeasia-taxonomy-updated.pdf
South African Taxonomy: https://sustainablefinanceinitiative.org.za/wp-content/downloads/SA-Green-Finance-Taxonomy-1st-Edition-Final-01-04-2022.pdf
Taiwan Sustainable Taxonomy: https://www.fsc.gov.tw/uploaddowndoc?file=Bulletin/202308041549191.pdf&filedisplay=Taiwan+Sustainable+Taxonomy.pdf&flag=docGUIDANCE

Standards & Frameworks

CSRD - E5-5 Key Products & Materials, Metrics

Sustainable Products Program

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

Newly introduced in 2026

Applicable Industries

AIR, ALU, ARO, ATX, AUT, BLD, CHM, CMT, CNO, COL, COM, CON, COS, CSV, CTR, DHP, ELC, ELQ, FDR, FRP, GAS, HOM, HOU, ICS, IDD, IEQ, IMS, ITC, LEG, MNX, MUW, OGR, OGX, **OIE**, PIP, PRO, PUB, REI, REM, REX, RTS, SEM, SOF, STL, TCD, TEX, THQ, TLS, TRA, TRT, TSV

The transition to a sustainable economy requires solutions that promote decarbonization and use resources without straining ecosystems. Sustainable revenue is a metric suitable for comparing companies' output across industries and provides market transparency. Companies that demonstrate increasing sustainable revenues are better positioned to enter a resource-constrained world and gain a competitive advantage.
The purpose of this question is to assess the revenues generated by a company's products and/or services considered "sustainable" over the last four years. The data captured shows if and how many companies are focusing efforts on inclusive and holistic growth in their portfolio.

Question Rationale

Question Layout

Does the company have a program for sustainable products or services?

- Yes, the company has a program for sustainable products or services. Please indicate where this information is available in **public reporting or corporate website**

  The sustainable products program contains the following elements:
  - ☐ Classification system to define sustainable or "green" products is based on specific and quantified benefits (e.g. EU Taxonomy, other taxonomies, own classification system)
    - ☐ External verification of the sustainable products or services classification
  - ☐ Specific, time-bound and quantified target for increasing revenues from sustainable products and services, or number of sustainable products and services
  - ☐ Investments made (CAPEX, OPEX) to increase sustainable products or services portfolio
    - ☐ R&D resources to develop sustainable products or services
    - ☐ Infrastructure improvements to ensure products and services are produced/manufactured/maintained sustainably
    - ☐ Internal training on sustainable design principles for functions developing products or services (e.g. R&D, innovation)
  - ☐ Incentives for sales staff on sustainable products or services

Question-Specific Guidance & Definitions

Classification: The system used to determine which product/service in the portfolio is considered sustainable or "green" as compared to a "conventional" product/service. An effective classification system is based on specific and quantified criteria (e.g. Taxonomy).

Green CAPEX/OPEX: Capital expenditures or operational expenditures for initiatives to enhance sustainable products or services.

Investment in R&D resources: Funding, personnel or tools aimed at innovation of sustainable products or services.

Investment in infrastructure: Upgrades or modifications to facilities, equipment or processes to ensure that products and services are produced, manufactured, or maintained in a sustainable manner. For manufacturers, this may include investments that enable the production of sustainable products at scale.

Investment in training: Programs designed to educate employees that is involved in the development of products or services on sustainable design principles.

Incentive for sales staff: Monetary rewards or other incentives for sales employees to encourage sales of sustainable products or services.

Data Requirements

All evidence of a program must be presented in the context of sustainable products or services. The objective should be to increase the range of sustainable products or services, or increase the sales of these products or services.

Companies with a business model that is sustainable in nature and can attribute 95% or more of revenue to business activities within the business model will receive full points, given sufficient evidence to verify the claim is presented.

Disclosure Requirements

This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications) or corporate website.
Any response that cannot be verified in the attached public document(s) will not be accepted.

References

EU Taxonomy: https://finance.ec.europa.eu/sustainable-finance/tools-and-standards/eu-taxonomy-sustainable-activities_en

Standards & Frameworks

UNGC -E3, E3.1, E3.1.1, E9
CDP 2025 -5.5

Social Dimension

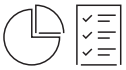
Labor Practices

Employees represent one of a company's most important assets. Maintaining good relations with employees is essential for the success of businesses' operations, particularly in industries characterized by organized labor. Beyond providing a safe and healthy working environment, companies should support fair treatment practices such as guaranteeing diversity and inclusion, ensuring non-discrimination, equal and fair remuneration, decent working time, social protection, supporting freedom of association, and promoting work-life balance. In accordance with international standards on labor and human rights, companies are expected to adhere to and apply these standards equally across all divisions within the organization. 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.

Labor Practices Commitment

Public: this question requires publicly available information

Assessment Focus



Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

The purpose of this question is to evaluate a company's commitment to upholding fundamental labor rights and ensuring fair treatment across its workforce and supply chain. By assessing whether companies have public policies or commitments in place, this question ensures transparency and accountability in areas such as living wages, working hours, equal pay, and worker protection. Strong labor commitments are essential for promoting fair working conditions, reducing risks related to workforce dissatisfaction, and enhancing a company’s social license to operate. A clear public commitment to labor rights indicates that a company is proactive in addressing labor issues and aligns its practices with international standards, contributing to a more sustainable and equitable workforce.

Question Layout

Does the company have a group-wide commitment to respect labor rights and is it available publicly?

- Yes, the company has a group-wide public commitment to respect labor rights. Please indicate where this information is available in **public reporting or corporate website.**

Commitment aspects

The commitment covers the following aspects:

- ☐ Paying a living wage
- ☐ Avoiding or reducing overtime or excessive working hours
- ☐ Setting maximum working hours
- ☐ Equal remuneration for men and women
- ☐ Paying workers for annual leave
- ☐ Setting minimum consultation or notice periods before mass terminations

Scope of commitment

Which parts of operations, corporate processes, and supply chain are covered by the labor practices commitment?

- ☐ Own operations
- ☐ Contractors
- ☐ Partners

Question-Specific Guidance & Definitions

Living wage: A wage that meets or exceeds the minimum required to cover the basic needs of workers and their families, which includes food, housing, clothing, healthcare, transportation, and education. It excludes bonuses and overtime pay. The living wage is often determined by a specific cost of living assessment or benchmark and is distinct from the minimum wage, which may be legally mandated but insufficient to cover basic needs.

Excessive working hours: Refers to working hours that exceed the legal or agreed-upon limit, which can have a negative impact on employees' health and well-being. These limits are set by national laws or collective agreements and aim to protect workers from exploitation.

Maximum working hours: The legally defined or agreed-upon limit for working hours per day or week to ensure the well-being of employees. Any hours worked beyond this are considered overtime.

Equal remuneration: As defined by the ILO "the term equal remuneration for men and women workers for work of equal value refers to rates of remuneration established without discrimination based on sex."

Annual leave entitlement: The number of paid days off that employees are entitled to take each year, as defined by labor laws or company policies, without impacting their wages or social protection.

Notice period before mass termination: The minimum amount of notice that companies must provide employees before executing mass layoffs or terminations. This period is usually mandated by national laws or collective agreements to allow affected workers time to prepare or seek alternative employment.

Own operations: Refers to the workforce directly employed by the company within its core business activities, including all locations and subsidiaries where the company has operational control.

Contractors: Workers employed by third-party entities but providing services to the company, often in the context of outsourced functions or temporary employment arrangements.

Partners: Entities or individuals that collaborate with a company on a long-term basis or as part of a business partnership, often involved in supply chain activities or joint ventures. In this context, it refers to their workforce and labor conditions.

Disclosure Requirements

This question requires supporting evidence from the public domain. The information provided must be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications) or corporate website. Any response that cannot be verified in the attached public document(s) will not be accepted.

References

Organizations and institutions that calculate living wage thresholds include but are not limited to:

- **Fair Wage Network** https://fair-wage.com/
- **Living Wage Foundation** https://www.livingwage.org.uk/accredited-living-wage-employers
- **MIT - Living Wage Calculator** https://livingwage.mit.edu/
- **Ethical Trading Initiative** https://www.ethicaltrade.org/act-initiative-living-wages
- **Asia Floor Wage Alliance** https://asia.floorwage.org/
- **Global Living Wage Coalition:** https://www.globallivingwage.org/

Standards & Frameworks

UNGC - G2, HR/L2, HR/L2.1

Labor Practices Programs

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

The purpose of this question is to assess how a company ensures the effective management of its labor practices through robust and dedicated labor programs. Transparency and the proper management of labor practices can have a direct impact on a company's workforce and ultimately influence the company's reputation when labor practices are unfair or do not follow local and national laws or standards as well as international norms. Labor related programs seek to cover a set of actions that companies should follow to promote productive employment and decent work. The application of labor programs provides companies with tools to assess and improve performance in aspects such as achieving equal remuneration and social protection.

Question Layout

Does the company have programs to manage its labor practices?

- ○ Yes, the company has programs to manage its labor practices. Please indicate where this information is available in **public reporting or corporate website.**

  - ☐ Ensure adequate wages at or above cost of living estimates or benchmarks
  - ☐ Monitor working hours including overtime management
  - ☐ Ensure employees are paid for overtime work
  - ☐ Regularly engage with workers' representatives on working conditions
  - ☐ Routinely monitor the gender pay gap to achieve equal remuneration for men and women
  - ☐ Expand social protection coverage for workers beyond public programs
  - ☐ Ensure employees are taking their paid annual leave entitlements
  - ☐ Provide training or reskilling to mitigate negative effects of industrial or climate transition changes

Question-Specific Guidance & Definitions

Adequate wage (used interchangeably with "living wage"): A wage that provides for the needs of the worker and their family considering economic and social conditions. Here, adequate wages should be at or above cost of living estimates as determined by a living wage/cost of living assessment.

Living wage (also referred to as "adequate wage"): Minimum pay received for the basic number of working hours and required to ensure coverage of workers and their families' basic needs. The living wage consists of the base salary and excludes bonuses and overtime (Fair Wage Network).

Living wage assessments could include at least the following three basic expenses (all): food, housing, and clothing. Additional expenses include, but are not limited to, health, transportation, personal care items, childcare, and education.

Decent working time/hours: This refers to the limit of hours of work within a day and a week to protect workers' wellbeing. Exceptions are applied, however, should adhere to regulations.

Overtime work: This includes hours worked in addition to the normal, legally mandated working hours during a day or week. (ILO).

For the purpose of this aspect, we expect companies to have programs in place to manage excessive working time (overtime) and ensure employees are paid overtime pay.

Workers' representatives: This refers to persons who are recognized as such under national law or practice, whether they are trade union representatives, namely representatives designated or elected by trade unions or by the members of such unions; or elected representatives, namely representatives who are freely elected by the workers of the undertaking in accordance with provisions of national laws or regulations or of collective agreements and whose functions do not include activities which are recognized as the exclusive prerogative of trade unions in the country concerned.

Equal remuneration: As defined by the ILO equal remuneration for men and women workers for work of equal value, this refers to rates of remuneration established without discrimination based on sex.

Routinely monitoring gender pay gap: It refers to measures taken to actively and regularly assess and work toward equal remuneration, such as conducting assessments, audits, or external analyses of the gender pay gap. Merely reporting pay indicators, without providing clear information on the frequency and methodology of gender pay gap monitoring, is considered insufficient.

Social protection or social security: This includes but is not limited to the provision of medical care, sickness benefits, maternity benefits, invalidity benefits, old-age benefits, survivors' benefits, employment injury benefits due to occupational injuries and diseases, unemployment benefits, family benefits, etc.

For the purpose of this aspect, we expect companies to expand coverage of social protection programs beyond mandated social security contributions.

Paid annual leave: This refers to a period of time set by the employer, when employees can take time away from work while still receiving a paycheck and being eligible for social protection.

Training or reskilling to mitigate negative effects of industrial or climate transition changes: It refers to efforts by the company to support employees in adapting to shifts in business operations and workforce requirements resulting from the transition to a climate-resilient economy or other industrial changes.

For the purpose of this aspect, we will not accept information related to paying the minimum wage. Instead, we expect companies to implement measures to ensure employees are paid at or above living wage/cost of living estimates as determined by a set methodology.
For the purpose of this question, this includes initiatives designed to maintain or improve employees' skills in response automation, artificial intelligence, decarbonization, and phasing out of high-emission activities. It does not include training focused on enabling employees to reduce the company's environmental footprint or adapt to physical climate risks, but rather on preventing negative employment impacts (e.g., job loss, skill redundancy) due to industrial or climate transition.

Disclosure Requirements

This question requires supporting evidence from the public domain. The information provided must be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications) or corporate website.
Any response that cannot be verified in the attached public document(s) will not be accepted.

References

ILO Social Protection Portal

Organizations and institutions that calculate living wage thresholds include but are not limited to:

- **Fair Wage Network**
  https://fair-wage.com/
- **Living Wage Foundation**
  https://www.livingwage.org.uk/accredited-living-wage-employers
- **MIT - Living Wage Calculator**
  https://livingwage.mit.edu/
- **Ethical Trading Initiative**
  https://www.ethicaltrade.org/act-initiative-living-wages
- **Asia Floor Wage Alliance**
  https://asia.floorwage.org/
- **Business for Social Responsibility (BSR)**
  https://www.bsr.org/en/our-insights/blog-view/why-is-living-wage-so-complex
  https://www.bsr.org/en/our-insights/blog-view/implementing-a-living-wage-program

Standards & Frameworks

UNGC - HR/L3, HR/L4, HR/L4.1, HR/L8

Discrimination & Harassment

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

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

Question Layout

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

- ○ Yes, the company has a group-wide policy on non-discrimination and anti-harassment. Please indicate where this information is available in **public reporting or corporate website.**

  - ☐ Explicit statement prohibiting harassment:
    - ☐ Sexual harassment
    - ☐ Non-sexual harassment
  - ☐ Zero tolerance policy for discrimination
  - ☐ Trainings for all employees on discrimination or harassment in the workplace
  - ☐ Defined escalation process for reporting incidents specific to discrimination and/or harassment
  - ☐ Corrective or disciplinary action taken in case of discriminatory behavior or harassment

Question-Specific Guidance & Definitions

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

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

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

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

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

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

Data Requirements

We expect companies to have a statement explicitly prohibiting both sexual and non-sexual harassment.

We expect the company's policies and measures to be explicitly relevant to discrimination and harassment. A simple mention of discrimination in the codes of conduct is not considered sufficient. If discrimination and harassment are included in trainings, escalation processes, and disciplinary actions together with other breaches of the codes of conduct, it should be mentioned that each aspect also covers discrimination and harassment specifically.

Please note: If you have less than 100 employees or zero employees in its organization, then please answer "The question is not applicable to the company".

Disclosure Requirements

This question requires publicly available information.

References

ILO: Convention no. 111
ILO: Business, Discrimination and Equality

Standards & Frameworks

UNGC - HR/L4

Workforce Breakdown: Gender

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

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

We assess various labor key performance indicators (KPIs) of an organization to determine not only the quality but also the transparency of its reporting on diversity issues. Gender diversity can improve a company's performance as it increases the likelihood of bringing people with different types of knowledge, views and perspectives together. This diversity results in better innovative and problem-solving skills, improves talent attraction and retention, increases employee engagement, and results in higher efficiency. Several initiatives have already been taken by shareholders and governments to increase the share of women in the workforce and leadership positions. Therefore, companies who are early adopters of inclusive hiring and retention practices will benefit from positive recognition and lower compliance costs in the future.

This question specifically assesses workforce gender diversity by asking about the proportion of women at different levels of responsibility. We expect companies to also commit to gender balance across the talent pipeline by setting percentage targets for the levels of representation where they face the greatest challenges. This question looks at the companies' ability to disclose this data, as well as its performance compared to its industry peers and its ability to retain women talent.

Question Layout

Does the company monitor the following indicators regarding workforce gender diversity?

- Yes, the company reports the gender breakdown of its workforce.
  Please select the coverage of the data reported on as a percentage of FTEs:
  Dropdown menu:
  >75% of FTEs
  50-75% of FTEs
  25-50% of FTEs
  <25% of FTEs

Diversity indicator	Percentage (0 - 100 %)	Public target (0-100%)
Share of women in total workforce (as a percentage of total workforce)	☐ Public reporting available:	Target year: ☐ Public reporting:
Share of women in all management positions, including junior, middle and top management (as a percentage of total management positions)	☐ Public reporting available:	Target year: ☐ Public reporting:
Share of women in junior management positions, i.e. first level of management (as a percentage of total junior management positions)	☐ Public reporting available:	Target year: ☐ Public reporting:
Share of women in top management positions, i.e. maximum two levels away from the CEO or comparable positions (as a percentage of total top management positions)	☐ Public reporting available:	Target year: ☐ Public reporting:
Share of women in management positions in revenue-generating functions (e.g. sales) as a percentage of all such managers (i.e. excluding support functions such as HR, IT, Legal, etc.)	☐ Public reporting available:	Target year: ☐ Public reporting:
Share of women in STEM-related positions (as a percentage of total STEM positions)	☐ Public reporting available:	Target year: ☐ Public reporting:

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, and a consistent definition should be used in any other questions that may require information about organizational structures.

Gender identity: Each person's deeply felt internal and individual experience of gender. This may or may not correspond to the sex assigned at birth. Gender identity includes the personal sense of the body (which may involve, if freely chosen, modification of bodily appearance or function by medical, surgical or other means) and other expressions of gender, including dress, speech and mannerisms (European Institute for Gender Equality). In this question, we refer to employees who self-identify as women.

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 day-to-day operational objectives of organizations, conveying the directions of higher-level officials, and managing 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 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 human resources (HR), IT and legal. May also be referred to as roles that have profit and loss (P&L) responsibility.

STEM: Science, technology, engineering and mathematics. To be classified as a STEM employee, the employee should have a STEM-related qualification and make use of these skills in their operational position. Positions include, but are not limited to: Computer programmer, web developer, statistician, logistician, engineer, physicist and scientist.

Coverage: Corresponds to the scope of the data reported on. For example, if a company only reports on its employees in one country, and these employees represent X% of the total workforce, then the company should select the bracket which includes this X%. Please use consistent coverage for all indicators.

Data Requirements:

Please provide the coverage reported on as a percentage of FTEs.

We expect companies to have set **at least one public target** for one representation level in order to meet our requirements for the targets. We do not expect companies to have public targets for each level of representation, but only for one level. This target needs to be publicly available or will not be considered as relevant in the scoring of this question.

Please note: If you have less than 100 employees or no employees in your organization, then please answer "The question is not applicable to the company".

Disclosure Requirements:

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

- Women in the total workforce
- Women in all management positions
- Women in junior management positions
- Women in top management positions
- Women in revenue-generating positions
- Women in STEM-related positions

References

- The gender equality questions were developed in collaboration with **EDGE,** leveraging its robust research on gender equality. EDGE is the leading global assessment methodology and business certification standard for gender equality. It measures where organizations stand in terms of gender balance across their pipeline, pay equity, effectiveness of policies and practices to ensure equitable career flows as well as inclusiveness of their culture. Launched at the World Economic Forum in 2011, EDGE has been designed to help companies not only create an optimal workplace for women and men, but also benefit from it. EDGE stands for Economic Dividends for Gender Equality and is distinguished by its rigor and focus on business impact. EDGE Certification's diverse customer base consists of 200 large organizations in 44 countries across five continents, representing 29 different industries and employing globally more than 2.4 million employees
- **ILO convention No. 111**

Standards & Frameworks

UNGC - G10

Workforce Breakdown: Race/ Ethnicity & Nationality

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

Assessment Focus

Change from Last Year

Changed from 2025

Applicable Industries

All

Question Rationale

Provisions on equality and nondiscrimination are enshrined in international human rights law and in the constitutions and legislations of most countries. Nonetheless, many people continue to face prejudice, harassment and discrimination because of their ethnic or racial origins. According to the Organisation of Economic Co-operation and Development, the collection of accurate and comprehensive data on diversity is central to providing information on the racial and ethnic breakdown to implementing, monitoring and evaluating practices and policies that aim to address disadvantages and promote equal opportunities in all sectors of society.

To achieve the optimum mix of skills, backgrounds and experience, workforce diversity needs to go beyond discussing the percentage of women to also include other diversity indicators. Collecting and analyzing data on racial and ethnic diversity is difficult but not impossible. This question seeks to encourage companies to measure the racial and ethnic composition of their workforce in order to understand whether it fairly represents the broader demographic composition of their geographical locations. Collecting and disclosing this data is key to identifying any practices of discrimination or unequal opportunities and provides an important indicator to shareholders that diversity and inclusion are considered high on the corporate agenda. The attention of shareholders and regulatory agencies is now expanding to include diversity factors such as ethnic and racial diversity. Companies that are early adopters of inclusive hiring and retention practices and are transparent about these indicators will therefore benefit from positive recognition and lower compliance costs in the future.

Question Layout

Does the company monitor the breakdown of its workforce according to racial and ethnic self-identifications, or nationality?

○ Yes, the company monitors the breakdown of its workforce according to ethnic or racial minorities. Please indicate where this information is available.

Please select the coverage of the data reported on as a percentage of FTEs:
>75% of FTEs
50-75% of FTEs
25-50% of FTEs
<25% of FTEs

Breakdown based on, please specify:	Share in total workforce (as a percentage of total workforce)	Share in all management positions, including junior, middle and senior management (as a percentage of total management workforce)
Category name:		
Category name:		
Category name:		
Category name:		
Category name: ☐ Not relevant		
Category name: ☐ Not relevant		
Category name: ☐ Not relevant		

☐ The data is publicly available.

Question-Specific Guidance & Definitions

Self-identification: This refers to the assigning of a particular characteristic or categorization to oneself. In this question, we ask for the proportion of employees who self-identify as such, meaning that they have expressed their identification with this characteristic rather than having been assigned it by others based on physical or other attributes.

Structurally disadvantaged racial and ethnic minorities: Minorities that experience a higher risk of poverty, social exclusion, discrimination and violence than the general population, based on race or ethnicity. Structural disadvantage is experienced due to the way society functions, for example, how institutions are organized, who has power, how resources are distributed, how people relate to each other, etc. This question focuses on such minorities.

Race: In the absence of any internationally agreed definition, race is most often statistically characterized in terms of phenotype and appearance (e.g., skin colors), or regarding ancestry. This should not be understood as an attempt to trace the definition of race to biological, anthropological or genetic factors but rather to (somewhat artificially) distinguish it from the concept of ethnicity. (OECD, 2018)

Ethnicity: Describes a shared culture, which are the practices, values and beliefs that characterize those of a community. This multidimensional concept acts as an umbrella term encompassing language, religious traditions and others. (United Nations, 2017) A number of related concepts, including ancestry, citizenship and nationality, may overlap with ethnicity. However, ethnicity is not the same as nationality or citizenship, nor is it a measure of biology or genes. (OECD, 2018)

Indigenous identity: While no universal definition exists in international law, the term is used to refer to "tribal peoples whose social, cultural and economic conditions distinguish them from other sections of the national community, and whose status is regulated (wholly or partially) by their own customs or traditions or by special laws or regulations; and to peoples in independent countries who are regarded as indigenous on account of their descent from the populations which inhabited the country (or a geographical region thereof) at the time of conquest, colonization or establishment of present state, and who, irrespective of their legal status, retain some or all of their own social, economic, cultural and political institutions." (ILO, 1989)

Migrant background/origin: A person who has migrated into their present country of residence; and/or previously had a different nationality from their present country of residence; and/or at least one of their parents previously entered their present country of residence as a migrant (European Commission). In some countries, migrant origins are used as a proxy for ethnicity.

Foreign origin: A person who was born outside of the country of residence; and/or holds another nationality from their present country of residence; and/or at least one of their parents were born outside of the country of residence or hold nationality from another country. In some countries, foreign origins are used as a proxy for ethnicity.

Nationality: Generally defined as being a member of a given state. Nationality can be acquired by birth or adoption, marriage, descent or naturalization. Based on international conventions, every sovereign state is entitled to determine who can be a national of their country.

Coverage: The coverage corresponds to the scope of the data reported. For example, if a company only reports on its employees in one country, and these employees represent X% of the total workforce, then the company should select the bracket which includes this X%. If the company gave the opportunity to self-report to its employees, but a proportion of these employees have actively decided to refrain from providing this personal data, the proportion of these employees can still be included as part of the coverage.

Data Requirements

In Europe, according to **Article 9 of the GDPR**, it is prohibited to process personal data revealing racial or ethnic origin, except if the data subject has given explicit consent to the processing of those personal data, provided this is not prohibited by national law. Other exemptions exist, such as reasons of substantial public interest which might include statistical research purposes for equality of opportunity and treatment. As a result, the company does not collect racial or ethnic data, please report on the nationalities which make up the highest percentage of your employees, providing the name of each nationality in each “category name” text box. “Not applicable” will **not** be accepted, as we expect companies to report on the breakdown of nationalities.

We expect companies to report on **at least three different categories** (racial or ethnic categories, or nationalities) in order to score full points for this question. The coverage provides an indication of the scope of the data reported on but is not considered in the scoring of this question, as we recognize that the data is complex to consolidate at the global level.

Please note: If you have less than 100 employees or no employees in the organization, then please answer "The question is not applicable to the company".

Disclosure Requirements

Disclosure requirements for partially public question: Additional credit will be granted for relevant publicly available evidence covering at least one level of responsibility for at least three minority groups. If the company is unable or not allowed to report on ethnic and racial indicators, please report on the nationalities that make up the highest share of its workforce. Please note that this is not the preferred option, as nationality is an imperfect proxy for the diversity indicator assessed in this question. We do not accept disclosure on the geographical spread of the workforce. Here we refer to the nationalities of the employees rather than their geographical location. We expect disclosure on at least three different nationalities.

References

ILO convention No. 111
GDPR Article 9

Standards & Frameworks

CSRD - BP-2 Phase-In Provisions

Gender Pay Indicators

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

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

This question assesses a company's pay practices by evaluating the results of its gender pay assessments. An increasing number of countries are adopting regulations that require companies to conduct such pay assessments and disclose the results, making this topic of high strategic importance. Furthermore, unequal pay and gender pay gaps threaten a company's ability to attract and retain women employees, lower employee engagement and can cause reputational damage.

Question Layout

Does the company track the results of its gender pay gap or equal pay analysis?

○ Yes, the company tracks the results of its equal pay analysis. Please indicate where this information is available.

Currency:

Please provide the coverage reported on (as a percentage of FTEs):
Dropdown menu:
>75% of FTEs
50-75% of FTEs
25-50% of FTEs
<25% of FTEs

Employee level	Average women salary	Average men salary
Executive level (base salary only)		
Executive level (base salary + other cash incentives)		
Management level (base salary only)		
Management level (base salary + other cash incentives)		
Non-management level (base salary only)		

☐ The data is publicly available.
☐ The data has been third-party verified.

○ Yes, the company tracks the results of its gender pay gap analysis. Please consult the guidance of this question on how to calculate such gap, and indicate where this information is available.

Please provide the coverage reported on (as a percentage of FTEs):
Dropdown menu:
>75% of FTEs
50-75% of FTEs
25-50% of FTEs
<25% of FTEs

Indicator	Difference between men and women employees (percentage)
Mean gender pay gap	
Median gender pay gap	
Mean bonus gap	
Median bonus gap	

☐ The data is publicly available.
☐ The data has been third-party verified.

○ Yes, the company conducts gender pay assessments but does not disclose the results. Please indicate where this information is available.

Question-Specific Guidance & Definitions

Executive level: Employees who have an executive function and play a strategic role within an organization. They hold senior positions and impact companywide decisions. Executives usually report directly to the CEO. The CEO is included in the definition of executive level.

Management level: All management-level positions from first-line/junior managers up to top/senior managers with a reporting line two levels or fewer from the CEO. Excludes executive-level positions. Managerial functions are those that involve planning, policymaking, strategizing, leading and controlling.

Non-management level: Employees in charge of executionary functions, such as production and administrative positions. These employees have limited or no managerial role.

Other cash incentives: Monetary incentives paid on top of the employee's regular salary to reward employees for job performance or longevity. These incentives have an explicit monetary value and can include rewards such as bonuses and stock options.

Equal pay: Equal pay compares the salary of men and women who have the same or equivalent positions to assess whether they are paid the same for equal work.

Gender pay gap: The gender pay gap is the difference in average gross hourly earnings between women and men; it, therefore, assesses the difference in pay at the aggregated level. The gender pay gap does not take into account all the different factors that may play a role, such as education, hours worked, job type, career breaks or part-time work. However, it reflects the work that women do and their position in the company hierarchy, also indicating the equality of opportunities to develop one's career and access higher-paid positions.

Mean gender pay gap: The difference between the mean hourly pay rate of male full-pay relevant employees and that of female full-pay relevant employees. The mean gender pay gap is calculated as follows: **(Men's Salary - Women's Salary)/ Women's Salary,** and it should be expressed in percentage. If you are using an alternative method for your calculations, kindly adjust the figures according to the formula provided above.
As an example:
Mean salary men 60'000;
Mean salary women 55'000;
Mean gender pay gap = (60'000 - 55'000) / 55'000 = 0.09 = 9%

Median gender pay gap: The difference between the median hourly pay rate of male full-pay relevant employees and that of female full-pay relevant employees.

Mean bonus gap: The difference between the mean bonus paid to male relevant employees and female relevant employees.

Median bonus gap: The difference between the median bonus paid to male relevant employees and female relevant employees.

Coverage: Please select the coverage range on which the company is reporting. For example, if the company is reporting on its employees in country ABC, and these employees make up 80% of its total workforce, please select the coverage range ">75%."

Data Requirements

Disclosure requirements for partially public question: Additional credit will be granted for relevant publicly available evidence disclosing the metrics requested either for equal remuneration or the gender pay gap.

If the company conducts both equal pay and gender pay gap assessments, please select which option the company has data for the highest proportion of employees.

Please note: If the company has fewer than 100 employees or zero employees in its organization, then **please mark "The question is not applicable to the company".**

References

International standards: ILO convention No. 111

The gender equality questions were developed in collaboration with **EDGE**, leveraging its robust research on gender equality. EDGE is the leading global assessment methodology and business certification standard for gender equality. It measures where organizations stand in terms of gender balance across their pipeline, pay equity, effectiveness of policies and practices to ensure equitable career flows, and inclusiveness of their culture. Launched at the World Economic Forum in 2011, EDGE is designed to help companies not only create an optimal workplace for women and men but also benefit from it. EDGE stands for Economic Dividends for Gender Equality and is distinguished by its rigor and focus on business impact. EDGE Certification's diverse customer base consists of 200 large organizations in 44 countries across five continents, representing 29 different industries and employing more than 2.4 million employees internationally.

The study **"Do Firms Respond to Gender Pay Gap Transparency?"** (January 2019) examined the effect of pay transparency on the gender pay gap and firm outcomes by examining a 2006 policy change in Denmark that required firms to provide gender disaggregated wage statistics. Using detailed data and a differences-in-differences statistical approach, Bennedsen et al. found that the law did reduce the gender pay gap.

Standards & Frameworks

SFDR - M - Gender Pay Gap
UNGC - HR/L4.1, HR/L6

Workforce Trade Union and Collective Bargaining Coverage

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

Changed from 2025

Applicable Industries

All

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

Does the company publicly report on the total percentage of its employees that are represented by an independent trade union or covered by collective bargaining agreements?

- Yes, the company publicly reports on the total percentage of its employees that are represented by an independent trade union or covered by collective bargaining agreements. Please indicate where this information is available in **public reporting or corporate website**.

Metric	Unit	FY 2022	FY 2023	FY 2024	FY 2025
Percentage of employees represented by an independent trade union or covered by collective bargaining agreements	Percentage				

Question-Specific Guidance & Definitions

Collective bargaining agreements: Written legal contracts between an employer and a union representing the employees. These agreements can be at the sector, national, regional, organizational, or workplace level.

Independent trade union: A trade union that is not under the control of an employer, group of employers or of one or more employers' associations. It is free from interference by an employer or any such group or association.

Data Requirements

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

This question requires public evidence.

Please note: If the company has fewer than 100 employees or zero employees in its organization, then **please mark "The question is not applicable to the company."**

Employees based in countries where trade unions or collective bargaining agreements are illegal should not be included. Employees in countries where it is legal but the country has not ratified ILO Conventions 87 (Freedom of Association) or 98 (Right to Organize and Collective Bargaining) should still be included.

Standards & Frameworks

UNGC - HR/L4.1

Human Rights

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

Human Rights Commitment

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

The question will identify companies that have an active commitment to respect human rights in their business relationships in line with the UN Guiding Principles or another internationally accepted standard. The policy needs to be company-specific with a company-wide commitment and not just for a single site, business unit, or project.

Following the most recent international developments in the field of corporate non-financial disclosures, we want to know not only the coverage of business human rights policies, but the specific human rights issues considered within them. We also want to know whether the company highlights specific human rights for attention and, whether the commitment is limited to a particular set of rights, encompasses all internationally recognized human rights, or encompasses all internationally recognized human rights but highlights some as needing particular attention according to how the company operates.

This input will reinforce the understanding of a company's approach to human rights, building increased trust with different stakeholders and demonstrating international good business practices.

Question Layout

Does the company have a group-wide commitment to respect human rights and is it available publicly?

- ○ Yes the company has a group-wide commitment to respect human rights. Please indicate where this information is available in **public reporting or corporate website.**

  Commitment aspects
  The commitment covers the following aspects:

  - ☐ A statement of commitment to respect human rights in accordance with internationally accepted standards.
  - ☐ A statement of commitment to prevent/respect at least:
    - ☐ Human trafficking
    - ☐ Forced labor
    - ☐ Child labor
    - ☐ Freedom of association
    - ☐ The right to collective bargaining
    - ☐ Discrimination
    - ☐ Other rights:

Scope of commitment
Which parts of operations, corporate processes and supply chain are covered by the human rights commitment?

- ☐ Requirements for our own operations (employees, direct activities, products or services)
- ☐ Requirements for our suppliers
- ☐ Requirements for our partners

Question-Specific Guidance & Definitions

Respecting human rights:

- Avoid causing or contributing to adverse human rights impacts through their own activities, and address such impacts when they occur
- Seek to prevent or mitigate adverse human rights impacts directly linked to their operations, products, or services by their business relationships, even if they have not contributed to those impacts.

Suppliers: Include brokers, consultants, contractors, distributors, franchisees or licensees, home workers, independent contractors, manufacturers, primary producers, sub-contractors, and wholesalers.

Partners: Include agents, lobbyists and other intermediaries, joint venture and consortia partners, governments, customers, clients, and local communities.

Human trafficking: The recruitment, transport, transfer, harboring, or receipt of a person by such means as threat or use of force or other forms of coercion, abduction, fraud, or deception for the purpose of exploitation.

Forced labor: Forced labor is work performed involuntarily and under the menace of any penalty. It refers to situations where people are coerced to work through the use of violence or intimidation, or by more subtle means such as manipulated debt, retention of identity papers, or threats of denunciation to immigration authorities.

Child labor: Work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that:

- Is mentally, physically, socially, or morally dangerous and harmful to children
- Interferes with their schooling by depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.

Freedom of association: The right of workers and employers to form and join organizations of their own choosing

Right to collective bargaining: The right of workers to bargain freely with employers is an essential element in freedom of association. Collective bargaining is when employers and workers discuss and negotiate their relations voluntarily, in particular terms and conditions of work.

Right to non-discrimination: The principle of non-discrimination seeks to guarantee that human rights are exercised without discrimination of any kind based on race, color, sex, language, religion, political or other opinion, national or social origin, property, birth, disability, age, marital and family status, sexual orientation and gender identity, health status, place of residence, economic and social situation.

Data Requirements

Only referring to or being a signatory to external entities such as the UN Global Compact (UNGC) or International Labour Organization (ILO) is not sufficient for the statement of commitment. A letter from the company to the UNGC is also not sufficient. We require a company-specific statement of commitment.

Commitment should make reference to an international standard such as UN guiding principles on business and human rights, the OECD Guidelines for Multinational Enterprises. The company must say something about the precise standards followed.

Also, modern slavery statements won't be accepted as human rights commitments.

1. Commitment to respect human rights in accordance with internationally accepted standards:

Not acceptable:

- Complying with labor laws (e.g., US Equal Employment Opportunity regulations)
- Being aware of the UN guiding principles- General statements about respecting human rights
- Statements referring to not supporting one aspect of human rights (e.g., we do not support child labor)
- Only examples of initiatives are provided

Disclosure Requirements

The policy commitment may take the form of a single, stand-alone public policy regarding respect for human rights, or be included in a broader document, such as a code of ethics, code of conduct or business principles.

Scattered pieces of information (i.e., information not specific to Human Rights or reported in a diffuse / disconnected manner) won't be accepted as commitments.

A brief and general statement from the company saying that it respects human rights will not suffice.

The documentation is accepted as policy/commitment if it is on corporate level and:

- A dedicated policy
- A strategy section in the reporting

The documentation is not acceptable as policy/commitment if it is not on corporate level (i.e., one site or business unit) and/or:

- Unspecific and scattered pieces of information
- Information on a (pilot) project
- A case study
- Information on compliance with GRI or equivalent reporting requirements

This question requires supporting evidence from the public domain.

The information provided has to be included in the company's public reporting (e.g., annual report, sustainability report, integrated report, company publications) or corporate website.

References

Office of the High Commissioner for Human Rights: https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

Business & Human Rights Resource Center: https://www.business-humanrights.org/en/big-issues/un-guiding-principles-on-business-human-rights/

UN Global Compact guide to developing a policy: https://www.unglobalcompact.org/docs/issues_doc/human_rights/Resources/HR_Policy_Guide_2nd_Edition.pdf

Standards & Frameworks

CDP 2025 - 4.6.1

SFDR - A - Human Rights Policy, A - Human Trafficking Policies, M - UNGC and OECD Compliance Mechanisms

TNFD - Governance C

UNGC - G2, HR/L2, HR/L2.1

Human Rights Due Diligence Process

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

The question is to assess whether the company has a due diligence process to proactively and systematically identify potential human rights impacts and where they could occur. Here we ask about the scope of the due diligence risk identification process, whether it covers only the company's own operations or also its value chain and other activities, and whether it performs a human rights due diligence process before entering new business relationships (mergers, acquisitions, joint ventures, etc.). We also focus on the type of issues the company specifically addressed when carrying out the due diligence process and what type of vulnerable groups the company has clearly considered throughout the process.

A passive approach, such as a whistle-blowing or confidential reporting system, is not sufficient for this question.

There is an increasing number of studies addressing the link between good corporate performance, human rights, and financial returns. For example, some studies indicate businesses that properly address human rights issues are likely to have a more productive and profitable workforce and avoid costly risks. (Baglayan, Basak & Landau, Ingrid & McVey, Marisa & Wodajo, Kebene. Good Business: The Economic Case for Protecting Human Rights, 2018)

Question Layout

Does the company have a company-wide human rights due diligence process?

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

☐ Risk identification in the company's own operations
☐ Risk identification in the company's value chain or other activities related to its business
☐ Risk identification in new business relations (mergers, acquisitions, joint ventures, etc.)
☐ The company does a systematic periodic review of the risk mapping of potential issues

Check all the actual or potential human rights issues covered/identified that applies. It is expected that at least four groups are covered.

☐ Forced labor
☐ Human trafficking
☐ Child labor
☐ Freedom of association
☐ Right to collective bargaining
☐ Discrimination
☐ Others, please specify:

Check all the groups at risk of human rights issues covered/identified that applies. It is expected that at least four groups are covered.

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

○ No, the company has yet to conduct any assessments but is developing a human rights due diligence process. **Please provide information indicating the status and expected completion date.** Please indicate where this information is available in **public reporting or corporate website.**

Question-Specific Guidance & Definitions

Adverse human rights impact: This occurs when an action removes or reduces the ability of an individual to enjoy his or her human rights.

Human rights risks: The risks a company's operations/activities/products pose to people's fundamental human rights.

Human rights due diligence: The process through which enterprises can identify, prevent, mitigate, and account for how they address their actual and potential adverse impacts as an integral part of business decision-making and risk management systems. Due diligence can be included within broader enterprise risk management systems, provided it goes beyond simply identifying and managing material risks to the enterprise itself, to include the risks of adverse impacts related to human rights.

Data Requirements

For the actual or potential human rights issues identified, we expect evidence that some of the listed issues were identified or covered as part of the risk identification process.

For the groups at risk, we expect public evidence on the vulnerable groups the company has taken into account in the risk identification process (we expect public proof of having considered the specific risks faced by those groups or of having considered them as relevant stakeholders through the process). We do not expect all issues and all groups to be covered.

The outcomes of conducting the risk identification process should be provided in the following “Human Rights Assessment” question. A passive approach such as a whistleblowing or confidential reporting system is not sufficient for this question.

General risk assessment processes without mention to human rights are not valid.
Best practice would be risk map or heat map usually showing what and where potential issues could be.

Disclosure Requirements

Supporting documentation should be recent, provide a clear description of the due diligence process, indicate the coverage of business activities, and demonstrate that it is an ongoing activity. The information should be available in the public domain. The information provided has to be included in the company's public reporting (e.g., annual report, sustainability report, integrated report, company publications) or corporate website.

References

OECD Guidelines for Multinational Enterprises, Chapter IV. https://www.oecd.org/content/dam/oecd/en/publications/reports/2023/06/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_a0b49990/81f92357-en.pdf

OECD Due Diligence Guidance for Responsible Business Conduct. https://www.oecd.org/content/dam/oecd/en/publications/reports/2018/02/oecd-due-diligence-guidance-for-responsible-business-conduct_c669bd57/15f5f4b3-en.pdf

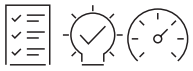
Standards & Frameworks

SFDR - Human Rights Due Diligence
TNFD - Governance C
UNGC - G4, G4.1, HR/L4.1

Human Rights Assessment

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

Assessment Focus



Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

The question assesses the extent to which the company is proactively identifying where risks are and how it is managing them. The process should consider the countries where contexts in which the organization operates, the potential and actual human rights impacts resulting from the organization's activities, and the relationships connected to those activities.
(source: https://www.unglobalcompact.org/docs/news_events/8.1/human_rights_translated.pdf).

Question Layout

Does the company report whether it has conducted an assessment of potential human rights issues across its business activities in the last three years?

- Yes, the company has conducted an assessment of potential human rights issues in the last three years. Please indicate where this information is available.

Category	A. Percentage of total assessed in last three years	B. Percentage of total assessed (column A) where risks have been identified	C. Percentage of risk (column B) with mitigation actions taken
○ **Own operations** (including joint ventures where the company has management control) Please select the basis for reporting (denominator): Dropdown menu: FTEs revenues clients investment portfolio sites products ○ Not known			
○ **Contractors** and **Tier I suppliers** (as a percentage of contractors or Tier I suppliers) ○ Not known			
○ **Joint ventures** (including stakes above 10%) (as a percentage of joint ventures) ○ Not relevant/Not applicable. The company does not have any joint ventures at stakes above 10%.			

☐ The data is publicly available.

☐ The data differs from its publicly reported figures. Please provide an explanation:

Question-Specific Guidance & Definitions

Own operations: Include direct activities, own employees, own sites, own products/services

Contractors and Tier I suppliers: Include brokers, consultants, contractors, distributors, franchisees or licensees, home workers, independent contractors, manufacturers, primary producers, sub-contractors, and wholesalers.

Joint ventures (including stakes above 10%): All joint ventures not included in own operations as defined above.

Percentage of suppliers assessed in the last three years: This refers to the number of entities across the different categories of business activities that have been assessed in the last three years, divided by the total absolute number of entities within the different categories of business activities in the current year. **If an entity has been assessed multiple times in the last three years, it should only be counted once.**

Data Requirements

Please complete the table 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 the company, select "Not relevant" and provide an explanation. If an entity has been assessed multiple times in the last three years, it should only be counted once.

For information on their own operations, companies may choose the basis for reporting from the following options: % of FTEs, % of revenues, % of clients, % of investment portfolio, % of sites, or % of products.

For information on contractors and Tier I suppliers, the basis for reporting should be the % of contractors and Tier I suppliers.

For information on joint ventures, the basis for reporting should be the % of joint ventures.

Operating in countries considered low risk for human rights abuses does **not** make the question not applicable for the company.

Disclosure Requirements

Disclosure requirements for partially public question:

Additional credit will be granted if evidence for at least one KPI, e.g., % of total assessed -own operations, contractors or tier 1 suppliers, or joint ventures- in last three years, is publicly available.

References

Office of the High Commissioner for Human Rights: https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

Business & Human Rights Resource Center: https://www.business-humanrights.org/en/big-issues/un-guiding-principles-on-business-human-rights/

Standards & Frameworks

SFDR - A - Child Labour Risk Exposure, A - Forced Labour Risk Exposure

UNGC - HR/L4, HR/L4.1

TNFD - Governance C.

Human Rights Mitigation & Remediation

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

The question is to know, through concrete examples, what the reporting company has done during the reporting period to reduce the likelihood of negative impacts related to each human rights risk and what actions it has taken when the impact has already happened.

In assessing human rights impacts, companies will have searched for both actual and potential adverse impacts. Potential impacts should be prevented or mitigated through the horizontal integration of findings across the business enterprise, while actual impacts —– those that have already occurred —– should be a subject for remediation.

Question Layout

Does the company have programs to mitigate and remediate negative impacts of human rights risks?

- Yes, the company has programs to mitigate and remediate negative impacts of human rights risks. Please indicate where this information is available in **public reporting or corporate website**.

  - ☐ Processes implemented to mitigate human rights risks
  - ☐ The number of sites with mitigation plans
  - ☐ The type of remediation actions taken

Question-Specific Guidance & Definitions

Mitigation actions: The mitigation of a negative human rights impact refers to actions taken to reduce the extent of the impact. The mitigation of a human rights risk refers to actions taken to reduce the likelihood that a potential negative impact will occur.

Remediation actions: Processes that apply when the company has caused or contributed to a negative human rights impact (an actual violation has already happened) and through which it is able to help ensure that the people who were impacted receive an effective remedy. The remediating action aims to restore individuals or groups harmed by a business's activities to the situation they would have been in had the impact not occurred. Where this is not possible, remediation can involve compensation or other forms of remedy that try to make amends for the harm caused. These outcomes may take a range of forms such as apologies, restitution, rehabilitation, financial or non-financial compensation, and punitive sanctions (whether criminal or administrative, such as fines), as well as the prevention of harm through, for example, injunctions or guarantees of non-repetition.

This should not be confused with "remediation" in the context of social audits, where the concept includes and typically focuses on forward-looking actions to prevent non-compliance from recurring.

Data Requirements

Information should be specifically related to human rights issues, general information on ESG or sustainability would not be accepted unless it states the specific human rights topics considered within, follow a more general approach.

We require supporting evidence to be available in the public domain.

Note: For the number of sites with mitigation plans, information on the general number of mitigation plans or the number of mitigation plans for operations/business units/business operations/products/investment portfolio/clients will also be accepted.

For remediation actions, in case the company has been involved directly or indirectly in a human rights impact, information should be provided on the type of remediation actions taken. The information should always be linked with an existing impact or violation. In case

the company has not caused nor contributed to any human rights violation, this should be stated in the public domain. In this case, the option can be ticked as no remediating actions would be expected.

Note for companies in BNK, FBN, INS:

Number of sites:

The number of sites can be interpreted as the number of portfolios, client relationships or products with mitigation actions in place.

Mitigation actions:

The following types of mitigation actions could also be considered when they **specifically refer to human rights** in case of indirect involvement in a potential adverse human rights impact:

- Specific human rights requirements in investment mandates or clear human rights conditions precedent to investments,
- Due diligence requirements with respect to investee companies,
- Use of leverage in case of investee company breach of covenants,
- Exclusions (maintaining a no-go list) of high-risk companies or companies that are in breach/violation of human rights principles,
- Active engagement with the investee,
- Divestment decisions.

Remediation actions:

As for remediation actions, companies within BNK, FBN and INS would frequently only be indirectly linked with the adverse impact. In those cases where the company has not contributed to the impact but is still directly linked to the harm through its business relationships, information about the efforts to persuade the investee company/business relationship to remediate the harm and about its participation in dialogue or mediation processes regarding the remediation of the adverse impact is expected. Also, information about cooperation with judicial and non-judicial mechanisms would be expected for companies involved in judicial or non-judicial proceedings related to human rights issues. Besides, an entity acknowledging the harm suffered and demonstrating efforts to improve its processes to ensure that similar adverse impacts will not reoccur is also acceptable.

In addition, information on direct mitigation and remediation actions is expected when the company has directly caused or may have caused an adverse human rights impact.

References

Doing business with respect for human rights, A guidance tool for companies, 2nd edition, 2016, Shift, Global Compact Network Netherlands,

Oxfam. https://www.businessrespecthumanrights.org/image/2016/10/24/business_respect_human_rights_full.pdf

Standards & Frameworks

CDP 2025 - 8.16

UNGC - G4, HR/L4, HR/L5

TNFD - Governance C

Human Capital Management

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

Training & Development Inputs

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

Assessment Focus

Change from Last Year

Changed from 2025

Applicable Industries

All

Question Rationale

To address the skills gap challenge and remain competitive in attracting and retaining talents, companies must carefully assess their investments in training, upskilling, and reskilling their workforce. Training and development can lead to outcomes such as reduced turnover, reduced external hiring costs, and a more engaged and committed workforce. This question assesses whether companies are leveraging their current workforce capabilities by investing in their training and development and whether these investments are made fairly across the entire employee base.

Question Layout

Does the company track its training & development data for the last four financial years?

○ Yes, the company tracks its training & development data for the last four financial years.
Please indicate the percentage of global FTEs the data in the table below represents:
Dropdown menu:
> 75% of all FTEs globally
50-75% of all FTEs globally
25-50% of all FTEs globally
< 25% of all FTEs globally

Metric	FY 2022	FY 2023	FY 2024	FY 2025	Supporting evidence	Public reporting
Average hours per FTE of training and development						☐ Yes
Average amount spent per FTE on training and development						☐ Yes

Currency:

The company breaks down the data for either of the KPIs above based on the following categories. Please select any that apply:

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

Question-Specific Guidance & Definitions

Full-time equivalents (FTEs): FTEs refers to the number of working hours that represents one full-time employee during a fixed period. 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: This refers to the total hours of training and development provided in the last financial year divided by the total number of FTEs.

Average amount spent on training and development per FTE: This refers to the total investment on training and development in the last financial year divided by the total number of FTEs. This figure should not include operational expenses such as the salaries of the "learning and development" team.

Type of training: Different types of training may include but are not limited to "on-the-job" training, coaching, mentorship, leadership training, compliance training, cultural diversity training, IT training, OHS training, etc.

Data Requirements

- **Please note:** If you have **25 or less FTEs** in the organization, then **please answer "The question is not applicable to the company".**
- **Difference in coverage of the different KPIs:** This question asks for two different KPIs. In case the reporting coverage of these KPIs is different, e.g., a company can provide data for "Average hours of training spent per FTE" for 70% of FTEs, but "Average amount spent per FTE" for only 30% of FTEs, then for consistency reasons, the company should provide data for both KPIs for 30% of FTEs.
- **Difference between publicly and privately available data:** Companies should report information in line with their public reporting. For example in a case where company publicly reports on "Average hours of training and development per FTE" for 50% of FTEs but could answer the question with a larger coverage that it is only privately available (e.g., for 100% of FTEs), the company should fill out the question based on the publicly available information which is verifiable.

Disclosure Requirements

Disclosure Requirements for Partially Public Question
Additional credit will be granted for relevant publicly available evidence covering the following aspect of this question:

- Average hours of training spent per FTE for the most recent financial year and/or
- Average amount spent per FTE on training and development programs for the most recent financial year.

Data Breakdown:

- Companies can provide a data breakdown for either of the two KPIs requested, i.e., "Average hours of training spent per FTE" and/or "Average amount spent per FTE on training and development programs".
- We don't expect companies to break down the data by all the categories mentioned in the question, but full points for this

section will be granted for having a breakdown for at least two categories. The purpose of this section is to assess whether companies can track these KPIs to evaluate and reassure the fair treatment of all employees.

- In Europe, according to **Article 9 of the GDPR**, it is prohibited to process personal data revealing racial or ethnic origin, except if the data subject has given explicit consent to the processing of this data, provided this is not prohibited by national law. Other exemptions exist, such as reasons of substantial public interest which might include statistical research purposes for equality of opportunity and treatment. We therefore expect companies to report on **only two different categories** to not penalize companies that do not report data breakdown on race.
- For this section, companies can attach either private or public evidence and we expect the specific data to be broken down by these categories, e.g., "x% average hours of training spent per FTE" for junior employees, y% for mid-level managers and z% for senior managers.

Standards & Frameworks

CSRD - BP-2 Phase-In Provisions, S1-13 Training & Skills Development

Employee Development Programs

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

One of the challenges companies face is comprehending the positive business and financial impacts of investing in employees and determining whether these investments yield the desired outcomes for both their workforce and the organization. This question assesses the availability of skill development programs for employees, whether on a full-time or part-time basis, and evaluates how effectively companies can measure the benefits of their human capital investments. Demonstrating these benefits and quantifying them is crucial. For investors, understanding whether companies are optimizing the returns on their investments in human capital is essential for evaluating the efficient deployment of capital and the strategic, forward-looking investments in their workforce.

Question Layout

Does the company have programs on employee development?

- ○ Yes, the company has programs on employee development. Please indicate where this information is available in **public reporting or corporate website.**

  - ☐ Learning methods (externally/internally) offered for employee development includes:
    - ☐ Coaching or Mentorship
    - ☐ Teams and Networks (e.g. Employee Resource Groups)
  - ☐ Type of program offered for employee development includes:
    - ☐ Leadership development program
    - ☐ Cultural education
    - ☐ Transition program for retiring and terminated employees
    - ☐ Digital transition program
  - ☐ Disclosure of the quantitative business impact of any of the programs mentioned
  - ☐ The program also covers contractual or part time employees in company's own workforce

Question-Specific Guidance & Definitions

Employee development programs: These refer to programs that have been developed to enhance or improve employees' skills. This does not cover programs providing employees with the basic skills they need to carry out their daily work or to help them reach certain minimum requirements, such as mandatory compliance training, annual recertification programs, basic OHS or workplace security training, board training for new board members, training programs that are necessary to bring new employees up to a minimum standard in order to fulfil their job requirements, graduate/trainee or apprenticeship programs.

Coaching: Coaching is a learning method that helps individuals find their own solutions to work-related challenges and goals. It's often used to help someone take on new responsibilities or address specific performance opportunities or challenges.

Mentoring: Mentoring allows learners to leverage their mentor's expertise and experience while reflecting on their own experiences and decisions. This process facilitates the sharing of knowledge and skills to address diverse learning needs, regardless of age or organizational level. Mentoring is often used to help less experienced individuals benefit from a mentor's advice and guidance for career

development. It also supports under-represented groups in developing the networks, skills, and behaviors needed to reach their potential within an organization.

Teams and Network (e.g., Employee Resource Groups): Learning through teams and networks can occur when individuals are encouraged to learn from and with people outside their day-to-day role, e.g., through participation in professional networks, communities of practice, contacts with customers and suppliers, and through other events and opportunities that occur from time to time. Such interactions can occur on a face-to-face basis but also occur through social media or technology-enabled forums and discussion groups. For example, Some companies have their own internal resource group such as “Learning Hub”, “Colleague Resource Group” that allows employees to collaborate, learn and develop their skills.

Leadership Development Program: This refers to the training initiatives that aims to enhance an individual’s leadership skills and abilities. These programs focus on equipping current and future leaders with personal leadership skills, honing specific skills to empower individuals to become leaders.

Cultural Education: Cultural education for employees refers to training programs and initiatives designed to increase awareness, understanding, and respect for different cultural backgrounds, practices, and perspectives. This type of education is crucial for organizations that operate in diverse environments, whether they are multicultural teams within a single country or international businesses working across borders.

Transition program for retiring and terminated employees: This includes transition assistance programs to facilitate continued employability, and the management of career endings due to retirement or termination. Transition assistance programs provided to support employees who are retiring or who have been terminated can include:

- pre-retirement planning for intended retirees;
- retraining for those intending to continue working;
- severance pay, which can consider employee age and years of service;
- job placement services;
- assistance (such as training, counselling) on transitioning to a non-working life

Digital transition program: A digital transition program focuses on helping employees adapt to new digital tools, processes, and technologies within the workplace. The goal is to ensure that employees are equipped to leverage digital advancements effectively, leading to increased efficiency and productivity supporting the overall digital transformation goal of the organization.

Quantitative business impact: This refers to either monetary or non-monetary metrics that a company uses to track and measure the impacts of its development programs. These metrics should be directly linked to the employee development program described in terms of a measurable outcome as a relevant indicator of more effective business performance. Examples include competency gained, operational efficiency gained, improvement in employee turnover, improved efficiency, increased productivity, increased revenue generation, cost savings, increased sales, etc. (i.e., specific statements of x% decrease in employee turnover etc.) This does not refer to the number of trainees/participants or any qualitative description of the before mentioned metrics (i.e., statements like “increased number of trainees”, “increase in employee engagement” etc.).

Coverage for contractual or part time employees in company’s own workforce: This refers to the applicability of the Employee Development Programs to contractual or part-time employees. Note: The program could either be one that already applies to full-time employees or a separate learning program for contractual or part-time employees.

Data Requirements

Companies should disclose programs based on their strategic significance and their capacity to demonstrate clear business impact.

Quantitative business impact: The quantitative business impact reported should be linked to the any of the Employee Development Program mentioned above.

Please note:

- One program evidence can be used to evaluate multiple options in the question, or there can be separate evidence for each option.
- We will accept both internal and external learning methods/programs for marking these options.
- If you have **25 or less FTEs** in the organization, then **please answer "The question is not applicable to the company".**

Disclosure Requirements

This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications) or corporate website.
Any response that cannot be verified in the attached public document(s) will not be accepted.

Standards & Frameworks

CSRD - BP-2 Phase-In Provisions, S1-1 Labour Practices, S1-4 Actions to Manage Impacts, S1-4 Key Actions

Human Capital Return on Investment

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

The human capital return on investment helps measure a company's profitability in relation to its total employee costs. It is derived by removing non-employee costs from overall operating costs and calculating the resulting operating profitability. This metric assesses economic value by looking at profitability in relation to human capital costs.

Question Layout

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

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

Metrics	FY 2022	FY 2023	FY 2024	FY 2025
a) Total Revenue, as specified in the "Denominator" question Currency:				
b) Total Operating Expenses Currency:				
c) Total employee-related expenses Currency:				
Resulting HC ROI (a - (b-c)) / c				
Total Employees, as specified in the "Denominator" question.				

Question-Specific Guidance & Definitions

Total revenue: This refers to the amount your company has received in revenues before any deductions are made.

Total operating expenses: This refers to the expenses your company incurs from its regular business operations. This should equal to the operating expenses reported in a company's income statement, in line with accepted financial accounting and reporting standards. It typically includes everything a company will have defined in its income statement. Operating Expenses can consist of the following:

Cost of Goods Sold (COGS) is tied the cost incurred on all raw materials and work in process, manufacturing expenses and costs incurred which can be directly attributable to generate the main revenues of the company. COGS include labour costs or employee salaries directly attributable to producing goods or delivering services.

Selling, General & Administrative (SG&A) expenses incurred in the normal operating businesses of the company, including advertising, marketing, plan contributions, delivery and distribution, storage, and other indirect production related expenditures

Research and Development expenses (R&D) which are costs incurred by a company on the development of a new product, innovation relating to technology formulation, process development, or on the process undertaken in upgrading the existing product or service line

Total employee-related expenses (salaries + benefits): This includes training and development programs, benefits and pensions and salaries and hiring, as it covers all costs directly related to employees.

Data Requirements

You can calculate your company's profitability prior to human capital costs by subtracting total operating expenses (b) less total employee-related expenses (c) from total revenue (a), your company's profitability prior to human capital costs is calculated. Dividing this figure by total employee-related expenses (c) will lead to the ratio that examines your company's level of profitability in relation to the total human capital expenses.

If the company is small because it outsources everything to contractors, then contractors may be considered as employees and the question will be applicable. Examples of these type of companies are:

- Companies which explicitly state that they do not have operational control over the portfolio companies.
- Companies where it is clear that the company is not involved in the operations of its investments.

Please note:

- If you have 25 or less FTEs in the organization, then please mark the entire criterion with "The question is not applicable to the company".
- If you have 26-100 FTEs, then please answer "The question is not applicable to the company".

Disclosure Requirements

Supporting evidence:

- This question requires supporting evidence from the public domain. The information provided has to be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications) or corporate website.
- Any response that cannot be verified in the attached public document(s) will not be accepted.

Standards & Frameworks

CSRD - BP-2 Phase-In Provisions

Hiring

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

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

Employees are one of the most important intangible assets for companies. The ability to attract qualified and talented employees, as well as to retain and nurture internal talent, is crucial for corporations to succeed. Companies focused on attracting the best talent should not forget about internal talents who have grown with the company and understand the organization, its mission and culture. Companies need to build organized internal career mobility processes to retain talent and reduce external hiring costs. This question asks for the number of new employee hires, the percentage of positions filled by internal candidates, and data breakdown by age, gender, race/ethnicity and management level.

Question Layout

Does the company track the total number of new employee hire rates and the percentage of open positions filled by internal candidates?

- ○ Yes, the company reports the total number of new employee hire and the percentage of open position filled by internal candidates. Please indicate where this information is available.

Metric	FY 2022	FY 2023	FY 2024	FY 2025	Public reporting
Total number of new employee hires					☐ Yes
Percentage of open positions filled by internal candidates (internal hires)					☐ Yes

The company breaks down the data for either of the KPIs above based on the following categories. Please select any that apply:

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

Question-Specific Guidance & Definitions

Full-time equivalents (FTEs): Full-time equivalents refers to the number of working hours that represents one full-time employee during a fixed time period, such as one month or one year. The concept is used to convert the hours worked by several part-time employees into the hours worked by full-time employees.

Total number of new employee hires: This refers to the number of new FTEs hired in the reporting year. It should not include internal candidates, i.e., existing employees that have been hired in different positions or internally promoted.

Percentage of open positions filled by internal candidates (or internal hires or promotions): This refers to the total number of open positions filled by a company's own employees divided by the total number of vacancies in the company in the reporting year. This metric provides a way to determine the effectiveness of human capital development by providing employees with the skills required for promotion, and also demonstrates how proactive organizations are in providing their employees with new challenges for growth and development throughout their careers.

Data Requirements

IMPORTANT if you are prefilling data from previous assessments:
Please note that for technical reasons, the data from fiscal 2019 is being prefilled in all four years for the "Percentage of open positions filled by internal candidates". Please make sure to review the prefilled data and update it accordingly for each fiscal year. Duplicated data that is not supported by an explanation in the comment box will be removed.

Data Breakdown

- We do not expect companies to break down the data by all the categories mentioned in the question, but full points will be granted for having a breakdown for at least two categories in this section. The purpose of this section is to assess whether companies can track these metrics to evaluate and reassure fair treatment of all employees.
- In Europe, according to **Article 9 of the GDPR**, it is prohibited to process personal data revealing racial or ethnic origin, except if the data subject has given explicit consent to the processing this data, provided it is not prohibited by national law. Other exemptions exist, such as reasons of substantial public interest which might include statistical research for equality of opportunity and treatment. We therefore expect companies to report on **only two different categories**, to not penalize companies that do not report data breakdown on race.
- For this section, companies can attach either private or public evidence and we expect to see the specific quantitative data broken down by these categories
- Options should only be ticked if the information on either of the KPIs in the table (either total number of new employee hires or percentage of open positions filled by internal candidates) is available.

Please note:

- If you have 25 or less FTEs in the organization, then **please mark "The question is not applicable to the company"**.

Disclosure Requirements

Additional credit will be granted for relevant publicly available evidence covering the following aspect of this question, for at least the most recent reported year.

- Total number of new employee hires
- Percentage of open positions filled by internal candidates (internal hires)

Standards & Frameworks

CSRD - BP-2 Phase-In Provisions

Employee Turnover Rate

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

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

People are one of the main drivers of corporate growth and play an essential role in the successful execution of companies' strategies. This question will assess total and voluntary turnover rates. Total turnover rates may fluctuate and reflect industry trends or economic cycles, while voluntary turnover rates can evaluate a company's ability to retain its employees. Voluntary turnover rates may reflect high levels of uncertainty or dissatisfaction among employees or structural organizational changes. A high turnover rate may impact employee productivity and lead to increased costs due to higher expenses for employee recruitment. Finally, it is important to evaluate turnover patterns by age, gender or other employee groups as these can indicate incompatibility or potential inequity in the workplace.

Question Rationale

Question Layout

Does the company track its employee turnover rate?

○ Yes, the company tracks its employee turnover rate. Please indicate where this information is available.

Turnover rate	FY 2022	FY 2023	FY 2024	FY 2025	Public reporting
Total employee turnover rate					☐ Yes
Voluntary employee turnover rate					☐ Yes
Coverage (as a percentage of all FTEs globally)					

The company breaks down the data of the total employee turnover rate based on the following categories. Please provide supporting evidence:

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

Question-Specific Guidance & Definitions

Total employee turnover: Refers to the proportion of employees who leave an organization over a set period — often a year) —as a percentage of the total employees. The figure should be calculated using the total employees at the end of the latest reporting year. The total employee turnover rate should be the sum of the voluntary and involuntary employee turnover rates.

Voluntary employee turnover: Refers to the proportion of employees who choose to leave an organization (e.g., resignation, retirement, early retirement, etc.) over a set period —often a year —as a percentage of the total employees. The figure should be calculated using the total number of employees at the end of the latest reporting year.

Data Requirements

- If the company does not have a lot of full-time equivalents (FTEs) because they outsource their activities to contractors, then contractors are to be considered employees.

- If the company's definition of the turnover rates does not match our definition, mark **"The question is not applicable to the company".**

Data Breakdown:

- We do not expect companies to break down the data by all the categories mentioned in the question, but full points will be granted for having a breakdown for at least two categories. The purpose of this section is to assess whether companies can track these metrics to evaluate and ensure the fair treatment of all employees.
- In Europe, according to **Article 9 of the GDPR**, it is prohibited to process personal data revealing racial or ethnic origin, except if the data subject has given explicit consent to the processing of this personal data, and provided this process is not prohibited by national law. Other exemptions exist, such as reasons of substantial public interest, which may include statistical research purposes for the equality of opportunity and treatment. We therefore expect companies to report on only two different categories to not penalize companies that do not report data breakdown on race.
- For this section, companies can attach either private or public evidence and we expect to see the specific quantitative data broken down by these categories.
- Options should only be ticked if the information on either of the KPIs in the table (either total employee turnover rate or voluntary employee turnover rate) is reported.

Please note:

- If you have **25 or less FTEs** in the organization, then please mark the **entire criterion** with **"The question is not applicable to the company".**
- If you have **26-100 FTEs**, please answer **"The question is not applicable to the company".**

Disclosure Requirements

Disclosure requirements: Additional credit will be granted for relevant publicly available evidence covering the following aspects of this question, for at least the most recent reported year.

- Total employee turnover rate
- Voluntary employee turnover rate

Standards & Frameworks

CSRD - BP-2 Phase-In Provisions, S1-6 Employees Overview

Type of Performance Appraisal

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

This question assesses the various methods that companies use to measure performance and how often performance appraisals take place. Appraisals aid the personal development of employees and ensure a holistic approach to team management. They also contribute to skills management and the development of human capital within the organization. Regular performance and career development reviews can also enhance employee satisfaction, which correlates with improved business performance.

Question Layout

Does the company conduct individual and/or team-based performance appraisals?

- Yes, the company conducts individual and/or team-based performance appraisals. Please indicate where this information is available in **public reporting or corporate website.**

  - ☐ Management by objectives
  - ☐ Multidimensional performance appraisal (e.g. 360 degree feedback)
  - ☐ Team-based performance appraisal
  - ☐ Agile conversations

  Please indicate the frequency at which performance appraisals take place, for at least one type of performance appraisal:
  - Ongoing
  - Quarterly/Twice a year
  - At least yearly
  - Not reported

Question-Specific Guidance & Definitions

Employees: Refers to full-time and part-time employees.

Management by objectives: Refers to a systematic process in which employees have predefined and measurable goals that are set in a collaborative manner with their line managers on at least a yearly basis together and routinely followed up on.

Multidimensional performance appraisal: Refers to a system in which the employee's performance is assessed using a variety of inputs, not just the targets set by a manager. This can include an assessment of how the employee meets the values and objectives of the department or company, receiving "360-degree" feedback from their peers, direct reports and other employees, and/or client or external feedback.

Team-based performance appraisal: Refers to a system where employees are assessed as part of a team rather than as individuals. It is likely that companies will use a two-pronged approach where, for example, team goals and employees' personal goals are set and weighted accordingly.

Agile conversations: Agile performance management is an unstructured approach to managing employee performance and development throughout the year, as opposed to on an annual or biannual basis. It is collaborative and involves regular conversations and continuous feedback. Agile performance management isn't solely focused on the outcome (i.e., an annual performance outcome or

rating). Rather, it is more about the process, which involves regularly readdressing objectives and barriers to effective performance.
Ongoing: Refers to conversations with a superior/manager/senior leader about professional development on a more than quarterly basis. These can be formal reviews and regular check-ins. We also accept information on employee appraisals for companies that are carrying them out for the first time, but the company needs to explicitly state that they will conduct them on an ongoing basis.

Data Requirements

Supporting evidence can be provided to support your response. This can be a reference to an integrated report, sustainability report, or weblink.

This question requires publicly available evidence covering the following aspects of this question, for at least the most recent reported year.

- The type of performance appraisal.
- How often a type of performance appraisal was carried out

Please note: If you have **25 or less FTEs** in the organization, then **please mark "The question is not applicable to the company".**

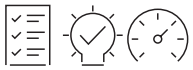
Standards & Frameworks

CSRD - BP-2 Phase-In Provisions, S1-4 Key Actions

Long-Term Incentives for Employees

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

Assessment Focus



Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

Long-term incentive programs are essential for companies to retain well-qualified employees. Such programs serve to orient key decisions throughout the organization around longer-term goals and strategic objectives, giving companies a greater likelihood of success. This question assesses the long-term incentive programs that companies have, the time frame for which performance incentives are paid out, the extent to which these programs apply to employees across the organization and the extent to which they are associated with sustainability principles.

Question Layout

Does the company offer programs on long-term incentives for employees below the senior management level?

○ Yes, the company offer programs on long-term incentives for employees below the senior management level.

Please describe the following aspects (both): 1) the type of long-term incentive program (e.g. stock options, restricted stock units, cash incentives, etc.); 2) the type of employees below the senior management level the program applies to:	**Company's long-term incentives for employees below the senior management level are on average paid out after:**	**Please report the percentage of company's workforce below senior management level (max. two levels from the CEO) that this program applies to:**	**Do the long-term incentives include targets associated with sustainability performance? Please explain in the comment box below:**	**Public reporting**
☐ Please provide relevant information below:	○ 2 years ○ 3 years ○ Longer than 3 years	percentage of employees	☐ Please provide relevant information below:	☐ Yes

Question-Specific Guidance & Definitions

Long-term incentives: Variable compensation that is tied to the performance of an employee. The performance can be measured in one or multiple years. This can include deferred cash bonuses, stock options and restricted stock units. Employee benefits such as pension contributions (whether mandatory or voluntary) or extra vacation days, should not be included as these are not linked to employee performance.

Sustainability performance: This 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 sustainability issues defined as material by your company.

Senior management level: Refers to employees that are within two levels of the CEO. “Employees below senior management” thus refers to all employees that are below the senior management level. Please note that we also allow the company to choose its definition of "senior management level" 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 period for performance: The average payout period on which incentive programs are based. If different payout time periods are used for different employee categories, please use a weighted average of the payout periods for long-term incentive programs that exist.

Percentage of workforce below senior management level: This refers to the percentage of employees not considered senior management that are part of the long-term incentives program. For example, if your company has 100 employees, with 10 being in senior management and 10 employees below senior management that are part of the long-term incentives program, then 11% (10 out of 90) of your employees below senior management level are covered in the program.

Long-term incentives for executive management and/or senior management are not accepted in this question.

Please mark the **"The question is not applicable to the company"** if the company doesn’t pay variable compensation (has a policy to not pay variable compensation). Please note, simply not giving shares to employees is not sufficient to accept "The question is not applicable to the company". The company needs to have an overarching policy to not pay variable compensation.

Please note: If you have **25 or less FTEs** in the organization, then **please mark "The question is not applicable to the company".**

Disclosure Requirements

Disclosure requirements for partially public questions: Additional credit will be granted for publicly disclosing information on long-term incentive program offered to employees below senior management level.

Supporting evidence:

- The document(s) you attached will be used to verify the qualitative part of your response. If a question text field is available, a comprehensive answer in that field can be accepted. Any qualitative response that cannot be verified in the attached document(s) or via the information provided in the related question text field (if available) will not be accepted.
- You may provide a reference using the reference clip. This could include examples of the underlying calculations or approaches to data aggregation used to compile the provided quantitative information.

Standards & Frameworks

CSRD - BP-2 Phase-In Provisions

Employee Support Programs

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

Employee health and well-being are essential to ensuring employee satisfaction, productivity and retention. While flexible work arrangements allow employees to adapt their work schedule to their individual needs and personal commitments, paid parental and care leave, as well as childcare facilities and lactation rooms, ensure that employees can balance work and care responsibilities. This flexibility and these benefits boost employee morale, increase productivity, reduce absenteeism, and help to attract and retain top talent while reducing turnover. This can result in companies improving their financial and nonfinancial performance indicators.

This question assesses the company's programs and policies that aim to foster employee health and well-being. To reward greater flexibility and equality for caregivers, the question considers the parental leave granted to nonprimary caregivers as a percentage of the total number of weeks provided to the primary caregiver.

Question Layout

Does the company have employee support programs?

- ○ Yes, the company has employee support programs. Please indicate where this information is available in **public reporting or corporate website**.

  - ☐ Workplace stress management
  - ☐ Sport & health initiatives
  - ☐ Flexible working hours
  - ☐ Working-from-home arrangements
  - ☐ Part-time working options
  - ☐ Childcare facilities or contributions
  - ☐ Breast-feeding/lactation facilities or benefits
  - ☐ Paid parental leave for the primary caregiver (please enter total number of paid leave in weeks offered to the majority of the employees):
  - ☐ Paid parental leave for the non-primary caregiver (please enter total number of paid leave in weeks offered to the majority of the employees):
  - ☐ Paid family or care leave beyond parental leave (care for a child, spouse, partner, dependent, parent, sibling, or other designated relation with a physical or mental health condition)

Question-Specific Guidance & Definitions

Workplace stress management: This refers to the programs, information or training offered that help employees manage their stress levels. This relates to both work and nonwork-related stress. Examples of workplace stress management programs include, meditation classes and other wellness programs or education that aim to help employees reduce stress and improve mental wellbeing in the workplace.

Sport and health initiatives: This refers to programs or initiatives that help promote the overall health of employees as regards physical activity and/or nutrition goals. Such programs could include on-site fitness facilities, virtual exercise classes, fitness tracking and biometrics, or gym reimbursement.

Flexible working hours: This refers to a schedule that allows employees to decide when to start and/or finish their workday according to their individual needs. Flexible working hours may give the employee total freedom over their working schedule or may require employee presence for a core set of hours in the day/week, with the rest of the time managed by the employee.

Working-from-home arrangements: This refers to a working arrangement by which employees can work from their own homes or other locations of their choice outside of company facilities.

Part-time work: Part-time work is a form of employment by which the employee works fewer hours in the week than what is deemed full-time employment.

Childcare facilities: This refers to on-site childcare centers or services that allow parents to drop off their children to qualified caregivers during their working hours.

Childcare contributions: This refers to the financial support designed to ensure that parents have access to qualified childcare services to take care of their children during working hours.

Breastfeeding/lactation facilities: This refers to a dedicated lactation room or facility where new mothers can breastfeed or use a breast pump for their newborn child. This space should be located at the workplace and offer privacy, comfort, storage and hygiene.

Breastfeeding/lactation benefits: This refers to benefits that ensure new mothers have the capacity and support to allow them to breastfeed or use a breast pump for their newborn child at work. These benefits include, but are not limited to, paid break times for feeding or pumping (15-20 minutes every 2-3 hours, depending on individual needs), and subsidies for the purchase of portable breastfeeding or breast-pumping equipment.

Paid parental leave for the primary caregiver: This refers to paid leave offered on top of normal paid vacation time to support primary caregivers during pregnancy, after birth, or for the adoption or fostering of a child. This paid leave is separate from other types of leave such as sick leave or paid time off. The primary caregiver is the person primarily responsible for the care and upbringing of a child.

Paid parental leave for the nonprimary caregiver: This refers to paid leave offered on top of normal paid vacation time to support nonprimary caregivers during pregnancy, after birth, or for the adoption or fostering of a child. This paid leave is separate from other types of leave such as sick leave or paid time off. A nonprimary caregiver is a person with parental responsibility for a child that does not have primary responsibility for the care and upbringing of the child.

Paid family or care leave beyond parental leave: This refers to paid leave granted to employees so they can take care of a spouse, domestic partner, child, dependent, parent, parent-in-law, grandparent, grandchild, sibling or other designated relation in the case of a physical or mental health condition that requires additional care. This is separate from paid parental leave, which is granted to parents who have a new child.

Data Requirements

It is expected that policies regarding flexible working hours, working-from-home arrangements and child-care contributions to have been in place before the Covid-19 pandemic, or, if implemented as a result of Covid-19, to be permanent policies. If the policies have been adopted as a reaction to the crisis and are still clearly only temporary, the information provided will not be accepted.

1. Flexible working hours:

- We will only accept flexible working hours if it applies to all employees (e.g., if the policy only applies to women coming back from maternity leave then it is not acceptable).

2. Working from home arrangements

- Information on Working from home arrangements is acceptable if it applies to all employees.

3. Paid parental leave for primary caregiver:

- This option does not refer to legal minimum requirements. This option relates to what the company offers their employees and pays them for.

4. Paid parental leave for non-primary caregiver:

- This option does not refer to legal minimum requirements. This option relates to what the company offers their employees and pays them for.

Please note: If you have **25 or less FTEs** in the organization, then **please mark "The question is not applicable to the company".**

Disclosure Requirements

Disclosure requirements for public questions: Supporting evidence available in the public domain is required for each aspect of this question.

References

- WELL Certification C08, C09 and C10

Standards & Frameworks

CSRD - BP-2 Phase-In Provisions, S1-15 Family-related Leave, S1-4 Actions to Manage Impacts, S1-4 Key Actions

Trend of Employee Wellbeing

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

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

Employee engagement, satisfaction and well-being surveys are crucial tools for evaluating employee conditions, developing policies to attract, retain and develop the best employees, and identifying areas for improvement. This question will determine whether companies conduct regular employee surveys and how metrics on job satisfaction, purpose, happiness and stress are addressed in employee surveys.

The four aspects — job satisfaction, purpose, happiness and stress — are recommended by the World Wellbeing Movement as evidence-informed employee well-being outcome measures, are developed by the University of Oxford's Wellbeing Research Centre. They capture the complementary dimensions of well-being at work as experienced by employees and align with how statistical agencies across the Organization for Economic Co-operation and Development are measuring general well-being. Research indicates there is a strong link between employee well-being and business outcomes such as employee productivity, retention, recruitment and firm performance.

Question Layout

Does the company track the results of its employee survey?

○ Yes, the company tracks the results of its employee survey. Please indicate where this information is available.

Please indicate in the following table the percentage of employees that are for example **highly engaged, with highly positive experience or a high level of wellbeing as found through the company's scaled employee surveys**. Please select only the core focus of the survey as well as its coverage. Please note: If the company only conducts its primary employee survey every two years, please duplicate the value of the previous year in the table and provide the target for the most recent year the primary survey was conducted.

Core focus	Unit	FY 2022	FY 2023	FY 2024	FY 2025	Target for FY 2025
Dropdown menu: Employee Engagement Employee Satisfaction Employee Wellbeing Employee Net Promoter Score (eNPS)	Percentage of employees with top level of engagement, satisfaction, wellbeing, or employee net promoter score (eNPS)					
Coverage	percentage of employees who responded to the survey					

☐ The data is publicly available.

The company breaks down the aspects addressed in the employee survey. Please select any that apply:

☐ Job satisfaction (external motivation, e.g. I am satisfied with my job)
☐ Purpose (internal motivation, e.g., my work has a clear sense of purpose)
☐ Happiness (e.g., I feel happy at work most of the time)
☐ Stress (e.g., I feel stressed at work most of the time)

Question-Specific Guidance & Definitions

Top level engagement or score: The top level is based on a classification where for example "highly engaged" is 7-10 on a 10 point scale, or equivalent. While companies might conduct multiple surveys, in this question we ask for the top level engagement or score only on the core focus of the survey. Depending on the core focus of the survey, top level can refer to the highest category of either engagement, satisfaction, well-being, or top level of employee net promoter score (eNPS).

% Of employee survey respondents: Refers to the percentage of full-time equivalent (FTE) employees who responded to the survey. This should not be the percentage of employees invited to participate in the survey.

Target: Targets can be the precise, stated target for the year in which the survey was conducted, if the target is long-term for a specific future year, it can be linearly extrapolated. For instance, if the company reports that 70% of employees **were engaged or satisfied** in fiscal 2020, and set a two-year target of reaching 80% by fiscal 2022, the linearly extrapolated target for fiscal 2021 would be 75% (e.g., 10% improvement divided by two years equals 5% per year).

Employee engagement: Definitions of employee engagement may vary, but the following are representative:

- **Gallup:** Those who are involved in, enthusiastic about, and committed to their work and workplace.
- **Utrecht Work Engagement Scale (UWES-9):** "A positive, fulfilling, work-related state of mind that is characterized by vigor, dedication, and absorption."
- **Grovo:** "A deep, personal, and empowered investment in work." Deep because the employee cares about the quality of their work. Personal because the work and its contribution to the success of the company matter to the employee. And empowered because "the employee is capable of delivering a quality that will reward their investment of time, talents, effort, and care."

Employee Satisfaction: Refers to external motivation and how happy employees feel about their job; specifically concerning external incentives such as employment benefits.

Employee well-being: According to Gallup, wellbeing refers to "all of the things that are important to each of us and how we experience our lives. Key wellbeing measures include how employees rate their current and expected future lives (life evaluation) and how strongly employees believe their organization cares about their wellbeing."

Employee net promoter score (eNPS): Refers to the question "on a scale of 0 to 10, how likely would you be to recommend this company to a friend or colleague as a place to work?" Those who respond with 9 or10 are considered promoters or a company's most positive, motivated, and satisfied people. Those who respond with 7 or 8 are passives or employees who are neutral, or generally content but not fully committed to the organization. Employees who answer with 0 to

6 are considered detractors or those who wouldn't recommend your company and are unhappy and disengaged to varying degrees.

Aspects addressed in employee surveys: The four aspects included in the question involve metrics related to the complementary dimensions of wellbeing at work as experienced by the employee. They align with how statistical agencies are measuring general wellbeing and how job platform Indeed surveys workplace wellbeing.

- **Job satisfaction:** Refers to questions in the survey that measure evaluative wellbeing (e.g., "I feel completely satisfied with my work")
- **Purpose:** Refers to questions in the survey that measure eudemonic wellbeing (e.g "My work has a clear sense of purpose")
- **Happiness:** Refers to questions in the survey that measures positive effect (e.g., "I feel happy at work, most of the time"
- **Stress:** Refers to questions in the survey that measures negative effect (e.g., "I feel stressed at work, most of the time")

Data Requirements

- If your company only conducts an employee survey every two years, please duplicate the value of the previous year in the table and provide the target for the most recent year a survey was conducted
- For the employee metric aspects section of the question, companies can attach either private or public evidence, however only information that can be verified will be accepted.

Please note:

- If you have **25 or less FTEs** in the organization, then please mark the **entire criterion** with **"The question is not applicable to the company".**
- If you have **26-100 FTEs**, then please answer **"The question is not applicable to the company".**

Disclosure Requirements

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

- The results of the annual employee survey (i.e., the % of employees with top level of engagement, satisfaction, wellbeing, or (eNPS) for at least the most recent reported year).

Standards & Frameworks

CSRD - BP-2 Phase-In Provisions, S1-2 Engagement Process, S1-3 Remediation, S1-4 Key Actions, S1-5 Targets, SBM-2 Stakeholder Engagement

Occupational Health & Safety

Poor occupational health and safety (OHS) performance has a direct negative impact on labor costs through lower productivity. Moreover, it can also affect a company's reputation, impact staff morale or increase operating costs through fines and other contingent liabilities. Our key questions focus on Key Performance Indicators (KPIs) for a company's own operations, and for its suppliers and their performance against industry benchmarks. Industry-specific questions additionally focus on training, audits and transparency. Industries operating in areas where HIV/AIDS is widespread are also expected to support their employees and minimize the risks of disruption to their business activities.

OHS Policy

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

The purpose of this question is to identify companies that have an active commitment to occupational health and safety (OHS) in line with the most relevant international standards. The policy needs to be company-specific with a company-wide commitment and not just for a single site, business unit, or project.

The OHS policy should cover a set of commitments that capture the long-term direction of the organization in terms of health and safety. It sets the company's approach to health and safety and clearly establishes what the company's expectations toward employees and other interested parties are.

The OHS policy provides an overall commitment and a necessary framework for the organization to set its objectives and take action to achieve the intended outcomes of the OHS management system.

The commitments included in the policy are reflected in a company's processes companies establish to ensure a robust, credible and reliable OHS management system. Therefore, an OHS commitment is necessary for building further measures.

The OHS policy should set the direction for effective health and safety management. Board members need to establish a health and safety policy that is much more than a document – it should be an integral part of the organization’s culture, values and performance standards.

Question Layout

Does the company have a policy on Occupational Health & Safety (OHS) and is it available publicly?

- Yes, the company has a policy on OHS. Please indicate where this information is available in **public reporting or corporate website.**

Policy aspects

The policy covers the following aspects:

- ☐ Applicability to the company's entire operations/employees and contractors or individuals under the company's supervision.
- ☐ Compliance with relevant OHS international standards and regulations, voluntary programs and/or collective agreements on OHS.
- ☐ Consultation with and participation of workers, and, where they exist, workers' representatives.
- ☐ A commitment to continually improve the performance of the OHS management system.
- ☐ Setting up action plans or prioritization of OHS related actions.
- ☐ Establishment of targets for improving OHS performance metrics.

Policy endorsement

- ☐ Please select the highest endorsing decision-making body:
  - Board of directors
  - Executive management

Data Requirements

This question assesses policies and commitments, therefore the information provided must be in the context of the company's OHS policies and commitments, not on actual OHS measures.

1. Commitment to establish targets for improving OHS performance metrics

- Actual OHS targets/metrics themselves are not acceptable

2. Endorsement by the top management

- Whoever signs the policy and in which capacity needs to be clear. If the CEO signs the policy, then it will be considered as endorsement by "Executive management" unless it is clearly specified that they signed the policy as a BOD representative.

Please note: If you have **25 or fewer full-time equivalents** in your organization, **please mark "The question is not applicable to the company".**

Disclosure Requirements

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

References

ISO 45001
ILO Occupational Safety and Health Convention, 1981 (No. 155)

Standards & Frameworks

SFDR - A - Severe Human Rights Incidents, A - Workplace Accident Prevention

UNGC - G1, G2, G3, G3.1, HR/L2, HR/L2.1, HR/L3

OHS Programs

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

All

Question Rationale

Poor occupational health and safety (OHS) performance directly affects labor costs through lower productivity. Lower performance not only poses a threat to a company's reputation and staff morale it results in increased operating costs in the form of fines and other contingent liabilities. This question, aims to find out how a company ensures effective management of health risks/issues and to identify companies that have dedicated OHS programs.

The OHS programs should cover a set of actions that ensure a robust, credible and reliable OHS management system, which aims to provide tools to assess and improve performance in the prevention of workplace incidents and accidents via the effective management of hazards and risks.

Question Layout

Does the company have programs on Occupational Health & Safety (OHS)?

- Yes, the company has an OHS programs. Please indicate where this information is available in **public reporting or corporate website**.

  - ☐ OHS risk and hazard assessments to identify what could cause harm in the workplace.
  - ☐ Prioritization and integration of action plans with quantified targets to address those risks.
  - ☐ Integration of actions to prepare for and respond to emergency situations.
  - ☐ Evaluation of progress in reducing/preventing health issues/risks against targets.
  - ☐ Procedures to investigate work-related injuries, ill health, diseases and incidents.
  - ☐ OHS criteria introduced in procurement and contractual requirements.
  - ☐ OHS training provided to employees and/or other relevant parties to raise awareness and reduce operational health & safety incidents.
  - ☐ Internal inspections.
  - ☐ Independent external verification of health, safety and well-being: please provide the names and standards used (such as ISO 45001):

Data Requirements

This question assesses management programs, therefore the information provided must be in the context of the company's management measures and programs. Policy-related information is not acceptable in this question.

Please note: If you have **25 or fewer full-time equivalents** in your organization, **please mark "The question is not applicable to the company".**

Disclosure Requirements

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

References

ISO 45001
ILO Occupational Safety and Health Convention, 1981 (No. 155)

Standards & Frameworks

UNGC - G7, HR/L4, HR/L4.1

Fatalities

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

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

ALU, ARO, ATX, AUT, BLD, BTC, BVG, CHM, CMT, COL, COM, CON, COS, CTR, DHP, DRG, ELC, ELQ, FDR, FOA, FRP, GAS, HOM, HOU, ICS, IDD, IEQ, ITC, LEG, LIF, MNX, MTC, MUW, OGR, OGX, **OIE**, PIP, REI, REM, REX, RTS, STL, TCD, TEX, TOB, TRA, TRT

Question Rationale

The tracking of work-related injuries and fatalities should cover a company's entire operations, including internal employees and external contractors. This is crucial for ensuring that legal requirements are met, problematic and/or dangerous operations can be identified, and that safety measures can be improved.

Question Layout

Does the company track its work-related fatalities for employees and contractors?

○ Yes, the company tracks its work-related fatalities for employees and contractors. Please indicate where this information is available.

Fatalities	FY 2022	FY 2023	FY 2024	FY 2025	Public reporting
Employees					☐ Yes
Contractors					☐ Yes

☐ The data has been third-party verified.

☐ The data differs from its publicly reported figures. Please provide an explanation:

Question-Specific Guidance & Definitions

Work-related fatalities: The death of a worker resulting from an occupational disease or injury sustained or contracted while performing duties controlled by the organization or at workplaces under the organization's control.

Contractor: Persons or organizations working on-site or off-site on behalf of an organization. A contractor can contract its workers directly, or contract subcontractors or independent contractors.

Data Requirements

OIE Sector: For Services Companies (consultancy or seismic surveying), please mark **"The question is not applicable to the company".**

Please note: If you have **25 or fewer full-time equivalents (FTEs)** in your organization, then **please mark "The question is not applicable to the company".**

Disclosure Requirements

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

- Number of work-related fatalities for employees and contractors for at least the most recent reported year.

Standards & Frameworks

UNGC - HR/L4.1

Lost-Time Injury Frequency Rate (LTIFR) - Employees

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

ALU, ARO, ATX, AUT, BLD, BTC, BVG, CHM, CMT, COL, COM, CON, COS, CTR, DHP, DRG, ELC, ELQ, FDR, FOA, FRP, GAS, HOM, HOU, ICS, IDD, IEQ, ITC, LEG, LIF, MNX, MTC, MUW, OGR, OGX, **OIE**, PIP, REI, REM, REX, RTS, STL, TCD, TEX, TOB, TRA, TRT

Question Rationale

Poor occupational health and safety performance has a direct negative impact on labor costs through lower productivity. Lower performance not only threatens company reputation and staff morale, can result in increased operating costs in the form of fines and other contingent liabilities. We expect companies to track the lost time injuries of their employees and prevent exacerbation of the injuries.

Question Layout

Does the company publicly report on the lost-time injury frequency rate (LTIFR) for its employees?

- Yes, the company publicly reports the LTIFR for its employees. Please indicate where this information is available in **public reporting or corporate website.**

LTIFR	Unit	FY 2022	FY 2023	FY 2024	FY 2025
Employees Dropdown menu: LTIFR LTIR	LTIFR (lost time injuries/1 million hours worked) LTIR (lost time injuries/200,000 hours worked)				
Coverage (as a percentage of employees, operations or revenues)	percentage of: Dropdown menu: Employees Operations Revenues				

☐ The data has been third-party verified.
☐ The company tracks LTIFR - Employees and LTIFR - Contractors on a consolidated basis.
☐ The coverage is temporarily reduced due to corporate actions. Please provide an explanation:

- **Alternative metric**
  Yes, the company publicly reports the lost work day rate (LWR) or days away/restricted or transferred (DART) rate for its employees (per 200,000 hours worked). Please indicate where this information is available in **public reporting or corporate website.**

Alternative metric	Unit	FY 2022	FY 2023	FY 2024	FY 2025
Employees Dropdown menu: LWR DART rate	Lost days/200,000 hours worked				
Coverage (as a percentage of employees, operations or revenues)	percentage of: Dropdown menu: Employees Operations Revenues				

☐ The data has been third-party verified.
☐ The company tracks DART rate or LWR - Employees and DART rate or LWR - Contractors on a consolidated basis.
☐ The coverage is temporarily reduced due to corporate actions. Please provide an explanation:

Question-Specific Guidance & Definitions

Lost time injury frequency rate (LTIFR): Any work-related injury that results in the company employee or third-party contractor employee not being able to return to work the next scheduled work day/shift.

The LTIFR is the number of lost-time injuries per 1 million hours worked, calculated using this formula:
LTIFR=(number of lost-time injuries) / (total hours worked in accounting period) x 1,000,000

Lost time injury rate (LTIR)
Any work-related injury that results in company employees or third-party contractor employees not being able to return to work the next scheduled workday/shift.

The LTIR is the number of lost-time injuries per 200,000 hours worked, calculated using this formula:
LTIR=(number of lost time injuries) / (total hours worked in accounting period) x 200,000

Days away/restricted or transferred (DART) rate: A calculation that describes the number of recordable injuries and illnesses per 100 full-time employees that resulted in days away from work, restricted work activity and/or job transfers for a company in a fiscal year.

DART rate formula: total number of DART incidents x 200,000 / number of employee labor hours worked in the fiscal year.

Lost workday rate (LWR): A calculation that describes the number of lost workdays per 100 full-time employees in the last fiscal year.

LWR formula: total number of lost days x 200,000 / number of employee labor hours worked
A lost workday incident accounts for the number of days of missed work, not the days that involved restricted tasks. The day the illness or injury occurred is not counted as a lost workday, and the total number possible for lost days due to a single incident is capped at 180.

Data Requirements

Metrics we do not accept as alternative and why:

- **Accident frequency rate (TOTAL NUMBER OF ACCIDENTS X 1 000 000 / TOTAL NUMBER OF MAN HOURS WORKED):** This cannot be accepted as this metric does not tell the lost time of accidents, only how often they have happened
- **Severity Rate (TOTAL NUMBER OF DAYS LOST X 1000 / TOTAL NUMBER OF MAN HOURS WORKED):** This is not acceptable as this metric as it is looking at the average number of lost days per incident, not the frequency of lost time per incident.
- **Mean Duration Rate (TOTAL NUMBER OF DAYS LOST / TOTAL NUMBER OF ACCIDENTS):** This is not acceptable as this is looking at the average number of days lost per accident, not how many lost time accidents there were in the fiscal year.
- **DURATION RATE (NUMBER OF MAN HOURS WORKED / TOTAL NUMBER OF ACCIDENTS):** This is not acceptable as its looking at the amount of time between accidents.
- **Annual Injury Incidence Rate (Number of reportable injuries in financial year) / (average number employed during the year)] x 100,000):** This is not acceptable as it does not tell the lost time due to these injuries.
- **Total Recordable Injury Frequency Rate (TRIFR):** (Number of events in the accounting period) / (Total hours worked in accounting period) x 1'000'000. This is not acceptable as it does not tell the lost time due to these injuries

For each row in the table, it is mandatory that the values provided are in the same unit.**Please note:** In case the company has **reported a value of zero** in the table, third-party verification is required to substantiate the figure reported.

ATX Companies: If your company reports an acceptable TRIFR Metric (Total Recordable Injury Frequency Rate, Total Recordable Incident Rate and Accident Frequency Rate), but does not report an acceptable LTIFR metric, please mark **"The question is not applicable to the company".**

OGR & OGX industries: The questionnaire for these industries contains both the - LTIFR and TRIFR questions. Therefore, both the indicators must be reported separately and availability of just one indicator is not sufficient enough to mark the other as **"The question is not applicable to the company"**. It is expected that the companies in these industries track both LTIFR and TRIFR separately.If your company combines LTIFR for employees and contractors, please answer this question combining the two figures and mark the question "**Lost Time Injury Frequency Rate (LTIFR) - Contractors**" as **"The question is not applicable to the company".**

If the LTIFR is only tracked on a consolidated basis, where employees and contractors are combined, the combined rate for at least the most recent reported year should be provided.

Please note:

- If you have **25 or fewer full-time equivalents (FTEs)** in your organization, **please mark "The question is not applicable to the company".**
- If you have **26-100 FTEs**, please also mark **"The question is not applicable to the company".**

Data Consistency

Please note that we only expect your company to report **ONE** metric only. If your company reports both the LTIFR and one of the alternative metrics, please use the LTIFR as this is the preferred metric.

If your company reports one metric for employees and another for contractors, this is acceptable.
Please note that LTIR (200,000 hours) can be selected in the Standard Metric table as the figure can be multiplied by five to reach the calculation of LTIFR (1 million hours).

Disclosure Requirements

Disclosure requirements for public question: Publicly available evidence covering the one of the following aspects of this question must be included:

- Employee LTIFR for at least the most recent reported year
- Employee DART rate for least the most recent reported year
- Employee LWR for least the most recent reported year.

Standards & Frameworks

UNGC - HR/L4.1, HR/L7

Lost-Time Injury Frequency Rate (LTIFR) - Contractors

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

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

ALU, ARO, ATX, AUT, BLD, BTC, BVG, CHM, CMT, COL, COM, CON, COS, CTR, DHP, DRG, ELC, ELQ, FDR, FOA, FRP, GAS, HOM, HOU, ICS, IDD, IEQ, ITC, LEG, LIF, MNX, MTC, MUW, OGR, OGX, **OIE**, PIP, REI, REM, REX, RTS, STL, TCD, TEX, TOB, TRA, TRT

Question Rationale

Poor occupational health and safety performance has a direct negative impact on labor costs through lower productivity. Lower performance not only threatens company reputation and staff morale, it can result in increased operating costs in the form of fines and other contingent liabilities. We expect companies to track the lost time injuries of their contractors to restrict the occurrence of such events and ensure overall safety across the supply chain.

Question Layout

Does the company track the lost-time injury frequency rate (LTIFR) for its contractors?

- Yes, the company tracks the LTIFR for its contractors. Please indicate where this information is available.

LTIFR	Unit	FY 2022	FY 2023	FY 2024	FY 2025
Contractors Dropdown menu: LTIFR LTIR	LTIFR (lost time injuries/1 million hours worked) LTIR (lost time injuries/200,000 hours worked)				
Coverage (as a percentage of contractors, operations or revenues)	percentage of: Dropdown menu: Contractors Operations Revenues				

  - ☐ The data is publicly available.
  - ☐ The data has been third-party verified.
  - ☐ The data differs from its publicly reported figures. Please provide an explanation:
  - ☐ The coverage is temporarily reduced due to corporate actions. Please provide an explanation:

- **Alternative metric**
  Yes, the company tracks the lost work day rate (LWR) or days away/restricted or transferred (DART) rate for its contractors (per 200,000 hours worked). Please indicate where this information is available.

Alternative metric	Unit	FY 2022	FY 2023	FY 2024	FY 2025
Contractors Dropdown menu: LWR DART rate	Lost days / 200,000 hours worked				
Coverage (as a percentage of employees, operations or revenues)	percentage of: Dropdown menu: Contractors Operations Revenues				

  - ☐ The data is publicly available.
  - ☐ The data has been third-party verified.
  - ☐ The data differs from its publicly reported figures. Please provide an explanation:
  - ☐ The coverage is temporarily reduced due to corporate actions. Please provide an explanation:

Question-Specific Guidance & Definitions

Lost time injury frequency rate (LTIFR): A lost time injury is defined as any work-related injury that results in the company employee or third-party contractor employee not being able to return to work the next scheduled work day/shift.

LTIFR only counts the lost time on the company's premises for contractors.

The LTIFR is the number of lost time injuries per 1 million hours worked, calculated using this formula:
LTIFR=(number of lost time injuries) / (total hours worked in accounting period) x 1,000,000

Lost time injury rate (LTIR)
Any work-related injury that results in company employees or third-party contractor employees not being able to return to work the next scheduled workday/shift.

The LTIR is the number of lost time injuries per 200,000 hours worked, calculated using this formula:
LTIR=(number of lost time injuries) / (total hours worked in accounting period) x 200,000

Days away/restricted or transferred (DART) rate: A calculation that describes the number of recordable injuries and illnesses per 100 full-time employees that resulted in days away from work, restricted work activity and/or job transfers for a company in a fiscal year.

DART rate formula: total number of DART incidents x 200,000 / number of employee labor hours worked in the fiscal year.

Lost work day rate (LWR): A calculation that describes the number of lost workdays per 100 full-time employees in the last fiscal year.

LWR Rate formula: total Number of lost days x 200,000 / number of employee labor hours worked

A lost workday incident takes accounts the number of days of missed work, not the days that involved restricted tasks. The day the illness or injury occurred is not counted as a lost workday, and the total number possible for lost days due to a single incident is capped at 180.

Contractor: Persons or organizations working on-site or off-site on behalf of an organization. A contractor can contract their own workers directly, or contract subcontractors or independent contractors.

Data Requirements

Metrics we do not accept as alternative and why:

- **Accident frequency rate (TOTAL NUMBER OF ACCIDENTS X 1 000 000 / TOTAL NUMBER OF MAN HOURS WORKED):** This cannot be accepted as this metric does not tell the lost time of accidents, only how often they have happened
- **Severity Rate (TOTAL NUMBER OF DAYS LOST X 1000 / TOTAL NUMBER OF MAN HOURS WORKED):** This cannot be accepted as this metric as it is looking at the average number of lost days per incident, not the frequency of lost time per incident.
- **Mean Duration Rate (TOTAL NUMBER OF DAYS LOST / TOTAL NUMBER OF ACCIDENTS):** This cannot be accepted as this is looking at the average number of days lost per accident, not how many lost time accidents there were in the fiscal year.
- **DURATION RATE (NUMBER OF MAN HOURS WORKED / TOTAL NUMBER OF ACCIDENTS):** This is not acceptable as its looking at the amount of time between accidents.
- **Annual Injury Incidence Rate (Number of reportable injuries in financial year) / (average number employed during the year)] x 100,000):** This is cannot be accepted as it does not tell the lost time due to these injuries.
- **Total Recordable Injury Frequency Rate (TRIFR):** (Number of events in the accounting period) / (Total hours worked in accounting period) x 1'000'000. This cannot be accepted as it does not tell the lost time due to these injuries

For each row in the table, it is mandatory that the values provided are in the same unit.

Please note: In case the company has **reported a value of zero** in the table, third-party verification is required to substantiate the figure reported.

ATX Companies: If your company reports an acceptable TRIFR Metric (Total Recordable Injury Frequency Rate, Total Recordable Incident Rate and Accident Frequency Rate), but does not report an acceptable LTIFR metric, please mark **"The question is not applicable to the company".**

OGR & OGX industries: The questionnaire for these industries contains both the - LTIFR and TRIFR questions. Therefore, both the indicators must be reported separately and availability of just one indicator is not sufficient enough to mark the other as **"The question is not applicable to the company".** It is expected that the companies in these industries track both LTIFR and TRIFR separately.

If your company combines LTIFR for employees and contractors, please answer "**Lost Time Injury Frequency Rate (LTIFR) Employees**" combining the two figures, mark "**Lost Time Injury Frequency Rate (LTIFR) - Contractors**" as **"The question is not applicable to the company"** and explain in the comment box.

Please note:

- If you have **25 or fewer full-time equivalents (FTEs)** in your organization, **please mark "The question is not applicable to the company".**
- If you have **26-100 FTEs**, please also mark **"The question is not applicable to the company".**

Data Consistency

If the occupational health & safety performance data reported in the questionnaire does not correspond to publicly reported figures, the corresponding option should be marked and the discrepancy should be explained. This option should not be indicated if the information is not publicly reported.

Please note that we only expect your company to report **ONE** metric only. If your company reports both the LTIFR and one of the alternative metrics, please use the LTIFR as this is the preferred metric.

If your company reports one metric for employees and another for contractors, this is acceptable.
Please note that LTIR (200,000 hours) can be selected in the Standard Metric table as the figure can be multiplied by five to reach the calculation of the LTIFR (1 million hours)

Disclosure Requirements

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:

- Contractor LTIFR for at least the most recent reported year
- Contractor DART rate for least the most recent reported year
- Contractor LWD rate for least the most recent reported year

Standards & Frameworks

UNGC - HR/L4.1, HR/L7

Customer Relations

Strong relationships with customers lead to increased customer loyalty. Harvard Business School research revealed that a 5% increase in retention can result in a profit increase of up to 75%, depending on the industry. The value of retaining customers makes perfect business sense when one considers that a consumer retained for life is more cost-effective, requires less service, provides more business, and contributes to new customer acquisition by offering positive referrals. Effective customer relations management is crucial for fostering loyalty and enhancing experience; companies prioritizing engagement through support and feedback channels better understand and meet customer needs, improving satisfaction and retention rates. Additionally, customer relationship management tools provide important data that allow the company to target relevant customer groups, develop specific products, and ensure that it has all relevant information to strengthen customer relationships. An online presence and channels have reshaped customer relationships: companies need to be present on several platforms to reach out to customers, and for some sectors today, it is strategically important to develop strong online capabilities. In some industries, customer data privacy and safety risks have emerged, and companies need to ensure strong policies to avoid increasing costs from breaches and negative reputational impacts.

The key focus of the criterion is on the tools a company has implemented or is using to manage customers, online strategy, sales and distribution channels, customer satisfaction, and customer protection.

Customer Relations Management

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

Newly introduced in 2026

Applicable Industries

AIR, ALU, AUT, BLD, BNK, BVG, CHM, CMT, CNO, COM, CON, COS, CSV, CTR, DHP, ELC, ELQ, FBN, FDR, FOA, FRP, GAS, HOU, ICS, IDD, IEQ, IMS, INS, ITC, LEG, MUW, **OIE**, PIP, PRO, PUB, REX, RTS, SEM, SOF, STL, TCD, TEX, THQ, TLS, TOB, TRA, TRT, TSV

Question Rationale

Effective customer relations management is critical for fostering loyalty and enhancing customer experience. Companies that prioritize customer engagement through comprehensive support and feedback channels are better equipped to understand and meet customer needs across a range of business models, including retail, business to business, concession-based and regulated contexts. This leads to improved customer satisfaction and retention rates.

The purpose of this question is to assess whether companies have established robust mechanisms to manage customer interactions, feedback and complaints effectively that address both regulatory expectations (where applicable) and customer experience management. This includes offering multiple communication and feedback channels, incorporating feedback into product and service development, and ensuring service is accessible to diverse customer groups. Additionally, the question aims to understand how companies handle complaints, including transparency on timelines and prompt communication.

Question Layout

Does the company have a program in place to manage and improve customer relations?

- Yes, the company has a program in place to manage customer relations. Please indicate where this information is available in **public reporting or corporate website.**

The customer relationship management program contains the following elements:

- ☐ Channels that customers can use to request support and give feedback:
  - ☐ AI-based chatbot
  - ☐ Online form submission or direct email contact
  - ☐ Dedicated phone line
  - ☐ In person
- ☐ Process to incorporate customer feedback into product and service development
- ☐ Customer service improvement mechanisms for disabled or elderly customers
- ☐ Complaint handling and resolution process, including:
  - ☐ Confirmation to the customer that the complaint has been received
  - ☐ Transparency on timelines for complaint resolution
  - ☐ Independent external verification of the complaint handling process: please provide the names and standards used (such as ISO 10002):

Question-Specific Guidance & Definitions

Customer support and feedback channels: This refers to the various methods and platforms through which customers can reach out to a company to request support, provide feedback, raise concerns, or seek information. These channels facilitate interaction and ensure that customer inquiries and concerns are addressed effectively. Having multiple communication channels is important because it enhances accessibility, efficiency, and customer experience, allowing a company to cater to diverse preferences.

Process to incorporate customer feedback into product and service development: This involves systematically gathering insights from customers through various channels, analyzing their suggestions and concerns, and integrating this information into the design and improvement of products and services.

Customer service improvement mechanisms for disabled or elderly customers: This refers to strategies and practices implemented by the company to enhance accessibility, responsiveness, service quality for disabled or elderly customers. The mechanisms may include dedicated hotlines, age and disability-friendly versions of websites (visual and readability features, simplified navigation and interaction, accessible content and language), product brochures in braille or barrier-free physical stores.

Complaint handling process: A systematic process to receive, investigate and resolve customer complaints or grievances effectively, ensuring customer satisfaction and continuous improvement of products and services. In the context of this question, the focus is on complaints about products and services (such as defective products or dissatisfaction with a service). A process focusing only on customer data is not relevant to this question.

Confirmation that the complaint has been received: A prompt acknowledgement to the customer that a complaint has been successfully logged helps enhance customer trust and sets the expectation for the next steps in the resolution process.

Transparency on timelines: This refers to clear and open communication provided to customers regarding the expected duration of the complaint resolution process.

External verification of complaints handling process: An independent, systematic assessment or audit of the company's processes and procedures for managing customer complaints by a third party, e.g. external auditor, regulator, market oversight. The process ensures that the company's complaints handling process is robust, reliable, and aligned with international standards such as ISO 10002:2018, ISO 9001. The verification must be valid in the reporting year.

Data Requirements

B2C companies should report about a program targeting consumers of their products/services (i.e. end users of the products/services instead of the distributor/retailers they sell their products through).

B2B companies should report about a program/framework targeting their customers or clients (direct buyers of their products or services).

In case the company is active in different businesses involving B2C activities (consumers) and B2B (customers), please report the information corresponding to the business that represents the highest share of your total revenue.

This question focuses on the existence and effective application of customer relations practices that reflect minimum good practice, rather than advanced systems. Responses should primarily describe company-wide processes and frameworks with local initiatives only referenced where they illustrate consistent implementation across the organization.

This question requires references to implemented programs or initiatives. Therefore, evidence related to policies or commitments are not acceptable. Please note that we expect only three out of the four options for "Channels that customers use to request support and give feedback."

Disclosure Requirements

This question requires supporting evidence from the public domain.

The information provided must be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications) or corporate website.

Any response that cannot be verified in the attached public document(s) will not be accepted.

Customer Satisfaction Measurement

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

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

AIR, ALU, AUT, BLD, BNK, BVG, CHM, CMT, CNO, COM, CON, COS, CSV, CTR, DHP, ELC, ELQ, FBN, FDR, FOA, FRP, GAS, HEA, HOU, ICS, IDD, IEQ, IMS, INS, ITC, LEG, LIF, MTC, MUW, **OIE**, PIP, PRO, PUB, REI, REM, REX, RTS, SEM, SOF, STL, TCD, TEX, THQ, TLS, TOB, TRA, TRT, TSV

Question Rationale

Research from Harvard Business School has shown that a 5% increase in customer retention can result in a bottom-line profit increase of up to 75%, depending on the industry. The economic power of retention is demonstrated by lifetime value. The value of retention makes business sense when considering that a consumer retained for life is more cost-effective, requires less service, provides more business, and contributes to new customer acquisition by offering positive referrals. Companies in business-to-consumer (B2C) industries should therefore monitor customer satisfaction and report the results of satisfaction surveys that target the consumers (i.e., end users) of their products/services.

Question Layout

Does the company monitor and set quantitative targets to improve satisfaction and are targets and results communicated externally?

o Yes, the company measures customer satisfaction using a relevant unit of measurement. Please indicate where this information is available.

Satisfaction measurement	Unit (please select the unit of measurement)	FY 2022	FY 2023	FY 2024	FY 2025	Target for FY 2025
Satisfaction measurement	Satisfaction measurement methodology: Dropdown menu: Percentage of satisfied customers/tenants Net promoter score or similar Rank or similar					
Coverage	percentage of: Dropdown menu: Customers Operations Revenues Tenants					

☐ The data is publicly available.

☐ The data differs from its publicly reported figures. Please provide an explanation:

Question-Specific Guidance & Definitions

Customer or client: Buyer of goods or services. In the context of this questionnaire, we focus on customers/clients for business-to-business (B2B) companies.

Consumer: User of a product or commodity. In economics, a consumer can either be a single person or an entire organization that uses a service. In the context of this questionnaire, we focus on consumers for B2C companies.

Percentage of satisfied customers/tenants: measurement of customer satisfaction based on percentage of satisfied customers or tenants

Net Promoter Score or similar: a metric used to capture customer experience. Other similar methodologies may also be accepted

Rank or similar: measurement of customer satisfaction in the form of ranking, or similar, where a lower number correlates to higher satisfaction.

Data Requirements

- B2C companies should report the results of satisfaction surveys targeting consumers of their products/services (i.e., end users of the products/services instead of the distributor/retailers they sell their products through).
- B2B companies should report the results of satisfaction surveys for their customers or clients (direct buyers of their products or services)

In case your company is active in different businesses involving B2C activities (consumers) and B2B (customers), please report the information corresponding to the business that represents the highest share of your total revenue.

For each row in the table, it is mandatory that the values provided are in the same unit.

Unit: Percentage of satisfied customers out of the total number of customers responding to the survey.

The percentage should be calculated as follows:
Number of satisfied customers / total number of customers responding to the survey

Data Coverage: Percentage of respondent and non-respondent customers surveyed out of total customers.

The data coverage should be calculated as follows:
Number of customers surveyed (respondents and non-respondents) / total number of customers

Companies may report full coverage if a statistically significant, representative sample of its customer base has been surveyed.

Target: We require the absolute target for the most recent reporting year. If your company has a multiyear 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.

Biennial satisfaction surveys: If your company only conducts a customer satisfaction survey every two years, please copy the results from the previous year (when you conducted a survey) into the box for the following year (when you not conduct one). For example, if you conducted a survey in 2015, but not in 2016, copy the results from the 2015 survey in the 2016 box, to fill the entire table and make it possible to calculate a trend (FY-2 to FY0).

If the data reported in the questionnaire does not correspond to the publicly reported figures, the 'The data differs from its publicly reported figures' option should be marked, and the discrepancy should be explained. This option should not be indicated if the information is not publicly reported.

Guidance for Utilities (ELC, MUW, GAS)
In case a company only has exposure to electricity transmission and/or distribution, we expect to use this question to gather information about the satisfaction of the clients using the services provided by the company regardless of the income model. For instance, we intend to capture information about the satisfaction of generators, consumers and/or distributors requesting connection access to the infrastructure, generators, and consumers participating in markets operated by the company, or participants in the network planning process if it is coordinated by the infrastructure operator, etc.

Guidance for Real Estate Management & Development and Equity REIT
In the "Denominator – Area" question, if the business activity "Management of Standing Investments" is chosen, we expect companies to choose "tenants" in the dropdown list for data coverage. If this activity is not chosen, i.e., only the activities "Development of new construction and/or major renovation projects" and/or "Services" are selected, we expect companies to report on "customers".

Investment holding companies: For companies that handle a broad portfolio of investments in various industries, please mark "The question is not applicable to the company".

CON & B2B sectors: If the business model is such that there are limited numbers of clients (less than 15) and therefore account managers are appointed for managing individual clients then this should be marked as "The question is not applicable to the company". For example, an upstream oil and gas company with a small number of industry customers. It maintains 1 to 1 client relationships; therefore, measures of customer satisfaction do not apply to them.

Disclosure Requirements

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

- Percentage of satisfied clients in the last reported year (measured through a satisfaction survey or through an alternative approach)

Standards & Frameworks

CSRD - BP-2 Phase-In Provisions, S4-5 Targets, SBM-2 Stakeholder Engagement

Community Relations

The rise of civil society, and the resulting increase in the availability of and access to information, has increased awareness of the impact of corporate activities on societies. New communication technologies and social media have improved stakeholders' ability to connect and coordinate, increasing the impact that local stakeholders can have on companies. These circumstances call for the implementation of policies and programs that adequately address the crux of good local stakeholder management. This includes identifying stakeholders beyond the traditional boundaries of shareholders, employees and customers. By engaging with local stakeholders, companies can minimize reputational risks (e.g., being the target of a high-profile activist campaign), improve operational efficiency via smooth collaboration with local communities and authorities, and strengthen their social license to operate by gaining greater respectability and credibility.

In this criterion, companies are assessed on whether it has a stakeholder engagement policy in place, whereby the company commits to identifying key local stakeholders, including them in their strategy and providing a grievance mechanism to streamline concerns. Companies are also assessed on whether it has a stakeholder engagement program to assess if the company's strategy is executed in an efficient and balanced manner.

Please note that the Community Relations criterion focuses on local stakeholder groups such as communities, authorities, media, associations and nongovernmental organizations that are not covered in other general or industry-specific parts of the questionnaire, such as investors (covered in the "Corporate Governance" criterion), employees (covered in "Human Capital Management") and customers (covered in "Customer Relations").

Furthermore, for certain industries there are specific issues related to community relations:

For companies in the homebuilding and real estate industries, Regulations increasingly require a certain quota of new developments to be designed specifically for lower-income groups or disadvantaged individuals. This impacts a company's reputation and its license to operate with regard to planning and construction permits. For these industries, the questions focus on the percentage of the building portfolio that currently meets social housing requirements and the process the company has adopted to integrate these considerations in planning and investment decisions.

Companies involved in mining activities own or operate assets often located in remote areas with limited development potential. However, by training local people or engaging with other organizations in order to improve local development opportunities, companies can contribute to local development, strengthening their license to operate. For these industries, the questions aim to assess how a company manages societal and environmental impacts of asset closures, and which key elements are included in their mine closure plans.

For extractive industries (e.g., mining, oil & gas) and companies producing basic materials (e.g., steel, aluminum) operating plants and facilities that are potentially hazardous to neighboring areas, negatively impacting the environment, cultural heritage and the health of local people. In some cases, such projects might even require local communities' relocation. To avoid the possibility of conflict, protest, or the cancellation of companies' operating licenses, it is critical to engage with communities at an early stage of the site's activities. For these industries, the questions focus on the extent of environmental and social impact assessments conducted by companies for new operations or the extensions of existing operations, their relocation programs and their efforts to prevent social unrest.

Stakeholder Engagement Policy

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

CHM, CNO, COM, CTR, ELC, GAS, MUW, OGR, **OIE**, REI, REM, REX, TLS, TRA, TRT

Question Rationale

By engaging with the relevant local stakeholders, companies can minimize reputational risks, improve operational efficiency via smooth collaboration with local communities and authorities, meet external standards and expectations, and strengthen their social license to operate by gaining greater respectability and credibility.

A robust policy or framework on stakeholder engagement is crucial for companies to navigate the complex landscape of modern business. Such a policy or framework can ensure that a company is responsible, ethical, and sustainable in throughout its global operations.

Our question assesses whether the company has a local stakeholder policy or framework in place, determining where in the company's value chain the impact on stakeholders lies and whether the policy has been endorsed by relevant management.

Question Layout

Does the company have a group-wide policy on stakeholder engagement and is it available publicly?

- Yes the company has a group-wide policy on stakeholder engagement. Please indicate where this information is available in **public reporting or corporate website.**

  Policy aspects

  The policy covers the following aspects:

  - ☐ Identifying affected communities and range of local stakeholders
  - ☐ Identifying vulnerable groups as part of identification process
  - ☐ Engagement strategy includes local stakeholders
  - ☐ Complaints/grievance mechanism available for communities

  Scope of policy

  Which parts of operations, corporate processes and supply chain are covered by the stakeholder engagement policy?

  - ☐ Own operations
  - ☐ Supply chain

  Policy endorsement

  - ☐ Please select the highest endorsing decision-making body:
    - Board of directors
    - Executive management

Question-Specific Guidance & Definitions

Local stakeholders: Local stakeholder groups include communities, authorities, media, associations and NGOs. These groups do not include stakeholders that are the focus of other general or industry-specific parts of the questionnaire, which cover investors (covered in the "Corporate Governance" criterion), employees (covered in "Human Capital Management"), customers (covered in "Customer Relations"), and suppliers (covered in "Supply Chain Management").

Identifying affected communities and range of local stakeholders: Identifying who the company's local stakeholders include is a vital starting point for a stakeholder engagement policy. In this question, we are seeking to ascertain whether a company has identified its local stakeholders. We would expect a process to support this result.

Identifying vulnerable stakeholders: Here, we are looking at whether the company has taken the next step in identifying out of their local stakeholders, who may be vulnerable. Identifying and prioritizing vulnerable stakeholders is crucial to ensure a company pursues ethical operations. Vulnerable stakeholders often include marginalized communities, Indigenous groups, low-income populations and others who may be disproportionately affected by a company's activities. Having a policy in place ensures that the company is committed to protecting and empowering these groups by addressing their unique needs and concerns.

Engagement strategy includes local stakeholders: Local stakeholders can often possess invaluable insight about their communities and the potential effects of a company's operations and vice versa. By including them in the development and implementation of the engagement strategy, this not only enhances the quality and relevance of the strategy itself but fosters a sense of ownership and collaboration for local stakeholders. A participatory approach can lead to more mutually beneficial outcomes, thus building trust, and ensuring the company's social license to operate.

Complaints/grievance mechanism available for communities: Acknowledging that conflicts or concerns may arise is a vital aspect of stakeholder engagement. Committing to ensure access to a well-defined grievance mechanism allows stakeholders to voice their complaints, seek resolution and hold the company accountable for its actions. This demonstrates the company's commitment to addressing issues and preventative measures to quell disputes from escalating into more significant problems. This allows a positive relationship to ensue with local stakeholders.

Data Requirements

Identifying Affected Communities and Range of Local Stakeholders

Our expectations:

- A process or assessment to determine the company's stakeholders. A commitment to carry out this identification is also acceptable.

Including Local Stakeholders in Engagement Strategy

Our expectations:

- We want to see explicitly that the company has a commitment to involving local stakeholders in the strategy.

Providing a Grievance Mechanism

Our expectations:

- We expect to see a publicly available grievance mechanism accessible for all stakeholders.

Endorsement by top management

Our expectations:

- We expect a review, sign-off, approval, and oversight of the stakeholder engagement policy process by the board of directors, a subcommittee of the board of directors, or a single named director OR an executive manager/executive committee.
- A general statement specifying sign-off/approval of the stakeholder engagement policy is also sufficient.
- **Not acceptable:** Executive manager/sustainability manager involvement in the stakeholder assessment process.

Please mark **"The question is not applicable to the company"** if the company does not operate near local communities and therefore does not need a stakeholder engagement policy. This must be made explicit by the company, through discussion of their operational plants and proximity to local populations. Please add an explanation in the Additional Comments box to support this option if chosen.

Disclosure Requirements

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

Any response that cannot be verified in the attached public document(s) will not be accepted.

Standards & Frameworks

CSRD - BP-2 Phase-In Provisions, GOV-1 Governance Bodies Role, S2-2 Engagement Processes, S3-1 Human Rights Commitments, S3-1 Policies, S3-2 Engagement Process, S3-3 Channels of Communication, S3-4 Actions Stakeholders & Collaborations, SBM-2 Stakeholder Engagement, SBM-3 Affected Communities

TNFD - Governance C

Stakeholder Engagement Programs

Public: this question requires publicly available information

Assessment Focus

Change from Last Year

No changes from 2025

Applicable Industries

CHM, CNO, COM, CTR, ELC, GAS, MUW, OGR, **OIE**, REI, REM, REX, TLS, TRA, TRT

Question Rationale

Stakeholder engagement programs are a strong indicator of the application of a company's implementation of its stakeholder programs. These programs encompass initiatives designed to actively involve, communicate with and address the concerns of local stakeholders. They reflect a proactive approach to stakeholder engagement, ensuring that the company is not only aware of potential impacts but also actively working towards fostering positive relationships and sustainable practices.

By addressing key components within the stakeholder engagement programs, companies can demonstrate a comprehensive understanding of the intricacies involved in managing relationships with local stakeholders. Each element plays a crucial role in promoting transparency, accountability and responsiveness, contributing to the overall success of the company's stakeholder engagement strategy. Our question assesses whether the company has local stakeholder program(s) or framework(s) in place, determining where in the company's value chain the impact on stakeholders lies, and whether the programs have been endorsed by relevant management.

Question Layout

Does the company have initiatives in place to ensure the effective implementation of its stakeholder engagement programs?

- ○ Yes, the company has programs on stakeholder engagement. Please indicate where this information is available in **public reporting or corporate website.**

  - ☐ Conducting local stakeholder or community impact assessment
  - ☐ Clear communication channels for local stakeholders to communicate with the company
  - ☐ Capacity building for local stakeholders to ensure they can communicate with the company
  - ☐ Regular surveys/reviews of perceptions for local stakeholders on engagement strategy
  - ☐ Meeting with local stakeholders to identify emerging concerns
  - ☐ Tracking of grievances
  - ☐ Stakeholder engagement programs are applied at all local operations

Question-Specific Guidance & Definitions

Local stakeholders: Local stakeholder groups include communities, authorities, media, associations and NGOs. These groups do not include stakeholders that are the focus of other general or industry-specific parts of the questionnaire, which cover investors (covered in the "Corporate Governance" criterion), employees (covered in "Human Capital Management'), customers (covered in "Customer Relations"), and suppliers (covered in 'Supply Chain Management').

Conducting impact assessments: Conducting comprehensive impact assessments allows the company to identify potential negative impacts on its local stakeholders. By assessing these impacts, the company can proactively mitigate potential issues and prevent conflict, as well as streamline operations that minimize disruption that may otherwise occur from poor communication with local stakeholders. Moreover, this can enable the company to align its strategy with the long-term interests of the local stakeholders.

Clear communication channels for local stakeholders to communicate with the company: Clear communication channels with local stakeholders involve transparent methods established by the company to facilitate effective dialogue with the community. This includes dedicated platforms such as regular hearings, communication portals, websites or online forums for information access, inquiries and concerns. Easily accessible contact details for key company representatives contribute to this effort. Regular updates ensure timely and consistent dissemination of accurate information about the company's operations, plans and potential impacts. The goal is to establish a two-way communication flow, enabling local stakeholders to express thoughts, seek clarification and actively engage with the company.

Capacity building for local stakeholders to ensure they can communicate with company: In this question, we are specifically looking for how companies ensure that their local stakeholders are given the means to communicate with the company their concerns and questions. Capacity building entails improving accessibility of information for local stakeholders. This includes consideration of barriers for effective engagement and how to break these down to ensure communication is possible and effective.

Regular surveys/reviews of perceptions for local stakeholders on engagement strategy: As part of a robust local engagement strategy, this question looks for whether companies have incorporated a review of their local stakeholders' perception of their engagement strategy. This is a useful means to address concerns and measure the company's progress regarding community relations.

Meeting with local stakeholders to identify emerging concerns: Scheduled meetings with local stakeholders facilitate purposeful interactions between company representatives and surrounding communities. Proactive engagement defines these gatherings, as the company actively seeks input through forums and meetings to stay informed about community needs. These interactions serve as a platform to identify emerging concerns, providing stakeholders an opportunity to express views. These meetings go beyond information dissemination, creating a collaborative space for constructive dialogue, fostering trust and understanding. This approach contributes to a comprehensive stakeholder engagement programs, ensuring transparent and accessible communication with mechanisms to address emerging concerns in local communities.

Stakeholder engagement programs are applied at all local operations: Indicating the coverage of the stakeholder engagement program is a strong indicator of a company's commitment to implementing uniform procedures at all its sites.

Data Requirements

Note: General references to stakeholders or communities are not sufficient, we look for a specific mention to the points in each individual option.

Conducting local stakeholder or community impact assessment

Our expectations:

- Impact assessments should include an overall assessment of local groups and potential impacts as a result of their operations.
- It is sufficient for the company to state that they carry out the impact assessments, without detailing the process.

Capacity building for local stakeholders to ensure they can communicate with company

Our expectations:

- Publicly available information detailing how effective engagement is ensured through combating certain barriers, such as language.
- This may also include regular updates of the company's projects that impact local stakeholders, inviting them to give feedback and improving interaction with the company.

Regular surveys/reviews of perceptions for local stakeholders on engagement strategy

Our expectations:

- Here, we expect to see the public availability of a survey or review specifically for local stakeholders.
- Customer satisfaction surveys are not acceptable.

Tracking of grievances

Our expectations:

- We would also expect to see the number of resolved/unresolved grievances, however, reporting a figure of grievances alone would suffice.

Stakeholder engagement programs are applied at all local operations

Our expectations:

- This does not need to be on a point-by-point basis, the company can mention that one of their programs are applied at all their local operations.

Please mark **"The question is not applicable to the company"** if the company does not operate near local communities and therefore does not need a stakeholder engagement program. This must be made explicit by the company, through discussion of their operational plants and proximity to local populations. Please add an explanation in the 'Additional Comments' box to support this option if chosen.

Disclosure Requirements

This question requires supporting evidence from the public domain.
The information provided must be included in your public reporting (e.g., annual report, sustainability report, integrated report, company publications) or corporate website.
Any response that cannot be verified in the attached public document(s) will not be accepted.

References

- AA1000 Stakeholder Engagement Standard
- UNGP C2 Stakeholder Engagement
- ICMM - Principle 10: Stakeholder Engagement
- UNGC Local Network Issue Engagement Framework
- GRI Disclosure 2-29 and 2-30
- GRI 413: Local Communities

Standards & Frameworks

UNGC - HR/L3, E2
TNFD - Governance C

Unit Converter Table

Please use this table to assist you in understanding how our platform converts different units in the questionnaire. This applies to different questions, and you can find some examples in the questions related to Operational Eco-Efficiency. In these questions, you can select the unit you want to use from a drop-down menu. The system will automatically convert the value you entered to the unit we assigned to that datapoint.

Convert from	Convert to	Formula	Unit Type
BCF	BCF	x*1	energy
BCF	m³	x*28316846.6	volume
BOE	GWh	x*0.001699	energy
BOE	MWh	x*1.699	energy
BOE	Million BOE	x*0.000001	energy
BOE	kWh	x*1699	energy
BTU	BTU	x*1	energy
Barrels	m³	x*0.158987	volume
Calendar Year	Calendar Year	x*1	Year
Fiscal Year	Fiscal Year	x*1	Year
GJ	BTU	x*947817.07775	energy
GJ	GWh	x*0.0002778	energy
GJ	MWh	x*0.2778	energy
GJ	Million BTU	x*0.94781712031332	energy
GJ	kWh	x*277.8	energy
GWh	GWh	x*1	energy
GWh	TWh	x*0.001	energy
GWh	kWh	x*1000000	energy
MW	MW	x*1	power
MWh	BTU	x*3412141.63281	energy
MWh	GWh	x*0.001	energy
MWh	MWh	x*1	energy
MWh	Million BTU	x*3.4121416331279	energy
MWh	TWh	x*0.000001	energy
MWh	kWh	x*1000	energy
MWh/ML	MWh/ML	x*1	pure
Million BOE	Million BOE	x*1	energy
Million BTU	Million BTU	x*1	energy
Million USD	Million USD	x*1	monetary
Million metric tonnes	Million metric tonnes	x*1	mass
Million m³	Million m³	x*1	volume
Mio cubic meters	BCF	x*0.0353146667	energy
Mio cubic meters	m³	x*1000000	volume
Mio gallons (Imperial)	BCF	x*0.000160543653	energy
Mio gallons (US)	BCF	x*0.000133680556	energy
Mio liters	m³	x*1000	volume
Mio tons oil eq	Mio tons oil eq	x*1	pure
Monetary Units	Monetary Units	x*1	monetary

Convert from	Convert to	Formula	Unit Type
TWh	GWh	x*1000	energy
TWh	MWh	x*1000000	energy
TWh	TWh	x*1	energy
TWh	kWh	x*1000000000	energy
USD	Million USD	x*0.000001	monetary
USD	USD	x*1	monetary
USD/BOE	USD/BOE	x*1	pure
W/kg	W/kg	x*1	pure
cubic feet	BCF	x*0.000000001	energy
cubic feet	BTU	x*1027	energy
cubic feet	Million BTU	x*0.001027	energy
cubic feet	m^3	x*0.02832	volume
cubic meters	BCF	x*35314.667	energy
cubic meters	Million m^3	x*0.000001	volume
days	days	x*1	duration
g/PKT	g/PKT	x*1	pure
g/TKT	g/TKT	x*1	pure
gallons (Imperial)	m^3	x*0.004546	volume
gallons (US)	m^3	x*0.003785	volume
hours	hours	x*1	duration
incidents per 1.000.000 hours worked	incidents per 1.000.000 hours worked	x*1	pure
incidents per 200.000 hours worked	incidents per 200.000 hours worked	x*1	pure
kWh	BTU	x*3412.1416	energy
kWh	TWh	x*0.000000001	energy
kWh	kWh	x*1	energy
kg	kg	x*1	mass
kg	metric tonnes	x*0.001	mass
kg PFC / met. ton Al prod.	kg PFC / met. ton Al prod.	x*1	pure
kg/toe	kg/toe	x*1	pure
kl (fuel oil equivalent)	MWh	x*11.166007774	energy
km	km	x*1	length
koe (kg of oil equivalent)	MWh	x*0.01163	energy
l/100 PK	l/100 PK	x*1	pure
l/TKT	l/TKT	x*1	pure
liters	Million m^3	x*0.000000001	volume
liters	m^3	x*0.001	volume
long tons (UK)	kg	x*1016.05	mass
long tons (UK)	metric tonnes	x*1.016	mass
met. ton CO2e / 1000 km	met. ton CO2e / 1000 km	x*1	pure
met. ton. CO2e	met. ton. CO2e	x*1	mass
metric tonnes	Million metric tonnes	x*0.000001	mass
metric tonnes	kg	x*1000	mass
metric tonnes	metric tonnes	x*1	mass
metric tonnes carbon equivalent	met. ton. CO2e	x*3.667	mass

Convert from	Convert to	Formula	Unit Type
mg/L	mg/L	x*1	pure
miles	km	x*1.6093	length
million liters	Million m^3	x*0.001	volume
months	months	x*1	duration
m^3	m^3	x*1	volume
ounces	metric tonnes	x*0.0000283495	mass
pounds	kg	x*0.4536	mass
pounds	metric tonnes	x*0.0004536	mass
ppm	ppm	x*1	pure
short tons (US)	kg	x*907.18	mass
short tons (US)	metric tonnes	x*0.9072	mass
square meters	square meters	x*1	area
thousand liters	Million m^3	x*0.000001	volume
toe	GWh	x*0.01163	energy
toe	MWh	x*11.63	energy
toe	kWh	x*11630	energy
years	years	x*1	duration

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