



# NORM-BASED ENGAGEMENT

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## Q3 2024 Progress Report

October 2024



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## INTRODUCTION

The Norm-Based Engagement Quarterly Report for Q3 2024 consists of five parts. The first part provides a description of ISS ESG's Norm-Based Engagement solution, which is conducted on behalf of investors with companies that have been assessed under ISS ESG's Norm-Based Research to be facing alleged or verified severe, systematic, or systemic failures to respect international norms and guidelines on responsible business conduct.

The latter sections of the report provide details of progress of engagement activities that were carried out on behalf of institutional investors in Q3 2024:

- The second part of the report presents summary statistics of engagements initiated in Q3 2024.
- The third part highlights notable engagements carried out in Q3 2024.
- The fourth part provides summaries of engagement responses received in Q3 2024.
- The fifth part provides an overview of responsiveness to letters sent out in Q3 2024, as of 30 September 2024.

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

## ISS ESG NORM-BASED ENGAGEMENT APPROACH

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

### ENGAGEMENT SCOPE

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

UN GLOBAL COMPACT PRINCIPLES	NORM AREA	TOPIC EXAMPLES
1-2	 Human Rights	Human rights due diligence Indigenous rights / Stakeholder consultation
3-6	 Labour Rights	Workplace health and safety Union rights
7-9	 Environment	Pollution (Air, Water, and Soil) Environmental impacts
10	 Anti-Corruption	Bribery Anti-competitive behaviour

### ENGAGEMENT PROCESS

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

The engagement dialogue is initiated through letters to companies, sent by ISS ESG on behalf of participating investors. Dialogue may be conducted in writing or through calls and meetings, facilitated by ISS ESG. Some companies require repeated follow-ups to respond. Should the company remain unresponsive, enquiries are escalated to the CEO and the Board. Once efforts have been made to engage

both Investor Relations and a company's Executive Management, the feasibility of engagement is re-evaluated.

## ENGAGEMENT OUTCOMES

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

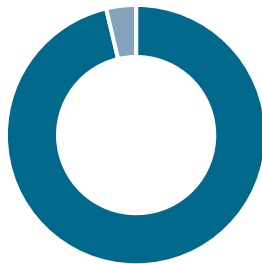
## STATISTICS FOR ENGAGEMENT INITIATED IN Q3 2024

In Q3 2024, ISS ESG initiated Norm-Based Engagement on behalf of signatory investors with 27 companies, covering 39 individual ESG topics. Of these 27 companies, one was Red flagged and the remainder Amber flagged, according to ISS ESG’s Norm-Based Research methodology. By 30 September 2024, ISS ESG had received responses from 10 of the 27 companies to which investor enquiries had been sent on 16 July 2024. This constitutes an overall response rate of 37%. The statistics presented below are based on the companies with which engagement was initiated in Q3 2024.

*Summary charts of engagements initiated between 1 July 2024 and 30 September 2024:*

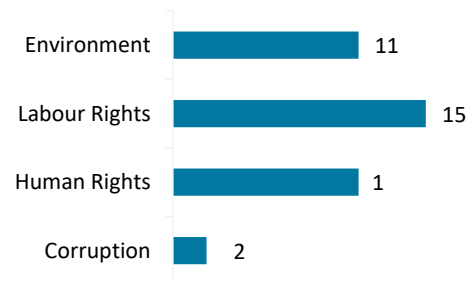
### Verified or Alleged Failure to Respect Established Norms

Verified Norm Violation  
(Red-flagged), 1



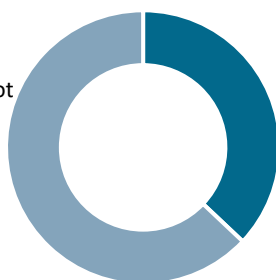
Alleged Norm Violation  
(Amber-flagged), 26

### Norm Area Breakdown



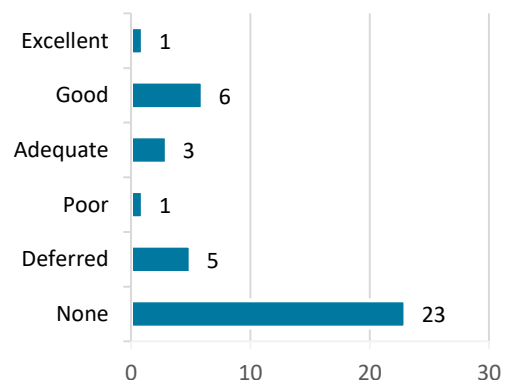
### Response Rate

Response Not  
Received  
63%



Response  
Received  
37%

### Quality of Participation



**NOTE:** Quality of participation definition: **Excellent:** The company has replied and substantially addressed all elements of the questions. **Good:** The company has replied and addressed most elements of the questions. **Adequate:** The company has replied, but only partially addressed the questions posed. **Poor:** The company has replied but did not address the questions posed. **Deferred:** The company has replied, acknowledging the enquiry, but has requested more time to respond and/or transferred the responsibility to another function in the company. **None:** The company has not replied.

## NOTABLE ENGAGEMENT ACTIVITY IN Q3 2024

The cases below are examples of notable Norm-Based Engagement activity carried out on behalf of participating investors in Q3 2024.

<p><b>Hochtief AG</b></p>	<p>ISIN DE0006070006</p>
<p>THEMES Biodiversity, Environmental impacts Indigenous rights, Living standards, Stakeholder consultation</p>	<p>LOCATION Canada</p>
<p>ACTIVITY SUMMARY</p>	<p>In Q2 2024, ISS ESG shared a letter with <b>Hochtief AG</b> on behalf of participating investors regarding the company’s controversies related to environmental impact and indigenous rights in Canada.</p> <p>In an engagement meeting facilitated by ISS ESG in September 2024, the company elaborated on its role in the Site C dam project as a contractor, and highlighted that the environmental impact assessment (EIA) is the project owner’s responsibility as part of the legal approval processes. The company further emphasized that projects like Site C are approved only after careful consideration of economic, environmental, and social benefits and that contractors only get involved after the governmental approval process is completed.</p> <p>Regarding environmental risks, the company noted that its involvement followed thorough assessments, including reviewing the government-approved EIA. The company’s subsidiary Flatiron Constructors Canada Ltd. and its partners participate in mitigation efforts, such as an environmental review process and a water quality monitoring program, in the Peace River delta and Wood Buffalo National Park. The company stressed that Site C is part of Canada's clean energy transition by replacing fossil fuels with hydroelectric power.</p> <p>On social impacts, Hochtief highlighted that indigenous rights are addressed through a similar assessment process. It pointed out that in 2023, five indigenous communities settled with the government, and no further claims have been made. Hochtief emphasized that claims related to social or human rights issues should be directed to the government or the project operator, BC Hydro. Hochtief also highlighted its efforts to engage indigenous communities, including awarding over USD 150 million in contracts to indigenous contractors and providing 200,000 hours of apprenticeship training, both exceeding contractual targets. The company confirmed that its due diligence processes, including environmental and social aspects, are thoroughly embedded in its operations, although its ability to influence project design is limited once the tendering process begins.</p> <p>Based on the information Hochtief provided in this engagement dialogue, the company was assessed to have made positive progress on all engagement goals of the environmental impact and indigenous rights topics in Canada. The company was assessed to have demonstrated an excellent quality of participation for both topics. ISS ESG continues to monitor the efficacy of the company’s remediation measures.</p>

<p>TC Energy Corporation</p>	<p>ISIN CA87807B1076</p>
<p>THEME Indigenous rights</p>	<p>LOCATION Canada</p>
<p>ACTIVITY SUMMARY</p>	<p>In Q2 2024, ISS ESG shared a letter with <b>TC Energy Corporation</b> on behalf of participating investors regarding the company’s indigenous rights controversy in Canada.</p> <p>In an engagement meeting facilitated by ISS ESG in September 2024, the company outlined its engagement with affected indigenous communities, especially the Wet’suwet’en First Nation, during the approval and construction of the Coastal GasLink (CGL) pipeline project. The project was approved by the British Columbia government in 2014, and the company took on the duty to consult with indigenous communities, as delegated by the Canadian government. The process was challenging due to internal divisions within the Wet’suwet’en, particularly between hereditary and elected leaders. While elected leaders supported the project, a group called "Dark House" opposed it, leading to unresolved tensions. Despite efforts, including environmental assessments, consultations, and monitoring programs, TC Energy could not reach an agreement with Dark House, which continued to oppose the project during construction, although over time, the group became more open to engagement.</p> <p>TC Energy stated that it implemented various grievance mechanisms, including an ethics hotline, relationship leads, and thousands of community meetings. The company expressed confidence in the project’s environmental and social approval process, stating that it has no plans for an independent third-party human rights impact assessment. TC Energy further stated that it does not expect the hereditary chiefs’ opposition to change as the company believes the opposition is against industrial development more broadly. The company respects the group’s right to protest and continues efforts to engage, though internal governance issues within the community remain a challenge.</p> <p>Based on the information TC Energy provided in this engagement dialogue, the company was assessed to have made positive progress on all engagement goals of the indigenous rights topic in Canada. Furthermore, the company was also assessed to have demonstrated an excellent quality of participation. ISS ESG continues to monitor the efficacy of the company’s remediation measures.</p>



## COMPANY RESPONSES RECEIVED IN Q3 2024

The following pages list responses received during Q3 2024, for engagements that commenced in Q3 2024 or earlier. ISS ESG received responses from 26 companies during Q3, related to 32 engagement topics. The tables present the progress achieved towards the engagement goals established for each company and topic. Deferred responses – in which the company acknowledged receiving the engagement letter but has yet to provide responses to the engagement questions – are not included.

AtkinsRealis Group Inc.		ISIN CA04764T1049
	<p><b>SDG ALIGNMENT</b> SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world’s cultural and natural heritage, SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels</p> <p>SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world’s cultural and natural heritage, SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands</p>	QUARTER Q2 2024
THEME Indigenous rights, Living standards, Stakeholder consultation		LOCATION Canada
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	REMEDIAL ACTION Commitment expressed	TERMINATION OF PRACTICE Commitment expressed
THEME Biodiversity, Environmental impacts		LOCATION Canada
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Commitment expressed	TERMINATION OF PRACTICE Commitment expressed
Bank of America Corporation		ISIN US0605051046
	SDG ALIGNMENT N/A	QUARTER Q2 2024
THEME Business-to-consumer conduct, Consumer rights		LOCATION United States
DISCLOSURE Commitment expressed		IMPLEMENTATION OF POLICIES Commitment expressed

GOALS SET & PROGRESS ACHIEVED	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Measures initiated
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<b>Barrick Gold Corporation</b>		ISIN CA0679011084
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	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.1: Reduce all forms of violence and related death rates everywhere	QUARTER Q3 2024
	SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials	

THEME Access to water / sanitation, Forced displacement, Human rights due diligence, Living standards, Right to life	LOCATION Papua New Guinea
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GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Commitment expressed	TERMINATION OF PRACTICE Commitment expressed

THEME Water pollution	LOCATION Papua New Guinea
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GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Measures initiated

<b>Blackrock Finance, Inc.</b>		ISIN US09290D1019
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	SDG ALIGNMENT SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services, SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage, SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q3 2024
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THEME Indigenous rights, Living standards, Stakeholder consultation	LOCATION Kenya
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GOALS SET & PROGRESS ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	REMEDIAL ACTION No measures announced	TERMINATION OF PRACTICE No measures announced

<b>Bunge Global SA</b>		ISIN CH1300646267
	SDG ALIGNMENT SDG 15: Life on Land; 15.2: Sustainable management of all types of forests, SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species	QUARTER Q2 2023
THEME Biodiversity, Deforestation		LOCATION Brazil
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	REMEDIAL ACTION Commitment expressed	TERMINATION OF PRACTICE Commitment expressed

<b>ENEOS Holdings, Inc.</b>		ISIN JP3386450005
	SDG ALIGNMENT SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands	QUARTER Q3 2024
THEME Biodiversity, Environmental impacts		LOCATION Chile
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	REMEDIAL ACTION No measures announced	TERMINATION OF PRACTICE No measures announced

<b>ENGIE SA</b>		ISIN FR0010208488
	SDG ALIGNMENT SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species	QUARTER Q1 2024
THEME Biodiversity		LOCATION Brazil
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Commitment expressed	TERMINATION OF PRACTICE Measures initiated

<b>EXOR NV</b>		ISIN NL0012059018
	SDG ALIGNMENT N/A	QUARTER Q3 2024
THEME Accounting / disclosure standards		LOCATION Italy
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	REMEDIAL ACTION No measures announced	TERMINATION OF PRACTICE No measures announced

<b>HANKOOK TIRE &amp; TECHNOLOGY Co., Ltd.</b>		ISIN KR7161390000
	SDG ALIGNMENT SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages, SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q3 2024
THEME Industrial accident, Workplace health and safety		LOCATION South Korea
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Commitment expressed

<b>Hawaiian Electric Industries, Inc.</b>		ISIN US4198701009
	SDG ALIGNMENT SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages	QUARTER Q1 2024
THEME Right to life		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Commitment expressed

<b>HD Korea Shipbuilding &amp; Offshore Engineering Co., Ltd.</b>		ISIN KR7009540006
	<p><b>SDG ALIGNMENT</b> SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages, SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers</p>	QUARTER Q3 2024
THEME Industrial accident, Workplace health and safety		LOCATION South Korea
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Commitment expressed

<b>Hochtief AG</b>		ISIN DE0006070006
	<p><b>SDG ALIGNMENT</b> SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world’s cultural and natural heritage, SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world’s cultural and natural heritage, SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels</p>	QUARTER Q2 2024
THEME Biodiversity, Environmental impacts		LOCATION Canada
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Credible measures adopted
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Commitment expressed
THEME Indigenous rights, Living standards, Stakeholder consultation		LOCATION Canada
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Credible measures adopted
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Commitment expressed

<b>Kinross Gold Corporation</b>		ISIN CA4969024047
	<b>SDG ALIGNMENT</b> SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands, SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species	QUARTER Q2 2024
<b>THEME</b> Biodiversity, Environmental impacts, Pollution, Water pollution		<b>LOCATION</b> Chile
<b>GOALS SET &amp; PROGRESS ACHIEVED</b>	<b>DISCLOSURE</b> No measures announced	<b>IMPLEMENTATION OF POLICIES</b> No measures announced
	<b>REMEDIAL ACTION</b> Commitment expressed	<b>TERMINATION OF PRACTICE</b> Commitment expressed

<b>Lyft, Inc.</b>		ISIN US55087P1049
	<b>SDG ALIGNMENT</b> SDG 10: Reduced Inequalities; 10.1: Achieve and sustain income growth, SDG 8: Decent Work and Economic Growth; 8.5: Achieve full and productive employment and decent work for all women and men, SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q1 2024
<b>THEME</b> Living wage, Working conditions		<b>LOCATION</b> United States
<b>GOALS SET &amp; PROGRESS ACHIEVED</b>	<b>DISCLOSURE</b> Commitment expressed	<b>IMPLEMENTATION OF POLICIES</b> Commitment expressed
	<b>REMEDIAL ACTION</b> No measures announced	<b>TERMINATION OF PRACTICE</b> Commitment expressed

<b>MMG Limited</b>		ISIN HK1208013172
	<b>SDG ALIGNMENT</b> SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage, SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q2 2024
<b>THEME</b> Indigenous rights, Living standards, Stakeholder consultation		<b>LOCATION</b> Peru
<b>GOALS SET &amp; PROGRESS ACHIEVED</b>	<b>DISCLOSURE</b> Measures initiated	<b>IMPLEMENTATION OF POLICIES</b> Measures initiated

GOALS SET & PROGRESS ACHIEVED	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Measures initiated
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<b>Osaka Gas Co., Ltd.</b>		ISIN JP3180400008
	SDG ALIGNMENT SDG 13: Climate Action; 13.3: Improve education, awareness-raising and human and institutional capacity on climate change	QUARTER Q2 2024
THEME Climate change impacts		LOCATION Australia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	REMEDIAL ACTION Commitment expressed	TERMINATION OF PRACTICE No measures announced

<b>Phillips 66</b>		ISIN US7185461040
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage, SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q2 2024
THEME Access to water / sanitation, Indigenous rights		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	REMEDIAL ACTION No measures announced	TERMINATION OF PRACTICE No measures announced

<b>Securitas AB</b>		ISIN SE0000163594
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.1: Reduce all forms of violence and related death rates everywhere	QUARTER Q2 2024
THEME Children's rights, Human rights due diligence, Right to health, Torture / inhumane treatment		LOCATION Switzerland
	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated

GOALS SET & PROGRESS ACHIEVED	REMEDIAL ACTION No measures announced	TERMINATION OF PRACTICE Commitment expressed
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<b>Serco Group Plc</b>		ISIN GB0007973794
	SDG ALIGNMENT SDG 10: Reduced Inequalities; 10.7: Facilitate orderly, safe, regular and responsible migration, SDG 16: Peace, justice and Strong Institutions; 16.1: Reduce all forms of violence and related death rates everywhere	QUARTER Q2 2024
THEME Children's rights, Human rights due diligence, Torture / inhumane treatment		LOCATION Australia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	REMEDIAL ACTION No measures announced	TERMINATION OF PRACTICE No measures announced

<b>STRABAG SE</b>		ISIN AT000000STR1
	SDG ALIGNMENT SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services, SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels, SDG 6: Clean Water and Sanitation; 6.1: Universal and equitable access to safe and affordable drinking water	QUARTER Q2 2024
THEME Access to water / sanitation, Living standards, Stakeholder consultation		LOCATION Chile
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	REMEDIAL ACTION Commitment expressed	TERMINATION OF PRACTICE Commitment expressed

<b>TC Energy Corporation</b>		ISIN CA87807B1076
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage, SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q2 2024
THEME Indigenous rights		LOCATION Canada



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

The Boeing Company		ISIN US0970231058
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q2 2024
THEME Union rights		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	REMEDIAL ACTION No measures announced	TERMINATION OF PRACTICE No measures announced

Uber Technologies, Inc.		ISIN US90353T1007
	SDG ALIGNMENT SDG 10: Reduced Inequalities; 10.1: Achieve and sustain income growth, SDG 8: Decent Work and Economic Growth; 8.5: Achieve full and productive employment and decent work for all women and men, SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers  SDG 10: Reduced Inequalities; 10.1: Achieve and sustain income growth, SDG 8: Decent Work and Economic Growth; 8.5: Achieve full and productive employment and decent work for all women and men, SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers  SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages	QUARTER Q3 2024
THEME Working conditions		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	REMEDIAL ACTION No measures announced	TERMINATION OF PRACTICE No measures announced
THEME Working conditions		LOCATION United Kingdom

GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Measures initiated
THEME Consumer health and safety, Consumer rights, Right to life		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Measures initiated

UGI Corporation		ISIN US9026811052
	SDG ALIGNMENT SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages	QUARTER Q2 2024
THEME Right to life		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	REMEDIAL ACTION No measures announced	TERMINATION OF PRACTICE No measures announced

Wilmar International Limited		ISIN SG1T56930848
	SDG ALIGNMENT SDG 15: Life on Land; 15.2: Sustainable management of all types of forests, SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species	QUARTER Q3 2024
THEME Biodiversity, Deforestation		LOCATION Indonesia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Commitment expressed

<b>Woodside Energy Group Ltd.</b>		ISIN AU0000224040
	<b>SDG ALIGNMENT</b> SDG 13: Climate Action; 13.3: Improve education, awareness-raising and human and institutional capacity on climate change  SDG 10: Reduced Inequalities; 10.3: Equal opportunities of outcome, SDG 5: Gender Equality; 5.1: End all forms of discrimination against all women and girls, SDG 5: Gender Equality; 5.2: Eliminate all forms of violence against all women and girls, SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q2 2024
	<b>THEME</b> Biodiversity, Climate change impacts, Environmental impacts	<b>LOCATION</b> Australia
<b>GOALS SET &amp; PROGRESS ACHIEVED</b>	<b>DISCLOSURE</b> Measures initiated	<b>IMPLEMENTATION OF POLICIES</b> Commitment expressed
	<b>REMEDIAL ACTION</b> Commitment expressed	<b>TERMINATION OF PRACTICE</b> Commitment expressed
<b>THEME</b> Gender discrimination (workplace), Sexual harassment (workplace), Workplace discrimination		<b>LOCATION</b> Australia
<b>GOALS SET &amp; PROGRESS ACHIEVED</b>	<b>DISCLOSURE</b> Measures initiated	<b>IMPLEMENTATION OF POLICIES</b> Measures initiated
	<b>REMEDIAL ACTION</b> Measures initiated	<b>TERMINATION OF PRACTICE</b> Measures initiated

## ENGAGEMENTS INITIATED IN Q3 2024

The following table provides an overview of the responsiveness to the engagements initiated in Q3 through the letters sent on 16 July 2024, as of 30 September 2024. Companies that had yet to respond to the initial engagement letters were sent reminder notifications on 16 September 2024. Continued non-response to the reminders will lead to escalation of engagement attempts to the CEO and then the Board level as described under the “Engagement Process” section earlier in this document.

ISSUER	ISIN	NORM AREA BREAKDOWN	RESPONSE RECEIVED
Aker Solutions ASA	NO0010716582	Environment	No
AntarChile SA	CLP0362E1386	Human rights	No
Barrick Gold Corporation	CA0679011084	Environment, Human rights	Yes
Blackrock Finance, Inc.	US09290D1019	Human rights	Yes
China Yangtze Power Co., Ltd.	CNE000001G87	Environment	No
Empresas Copec SA	CLP7847L1080	Human rights	No
ENEOS Holdings, Inc.	JP3386450005	Environment	Yes
EXOR NV	NL0012059018	Corruption	Yes
Grupo Mexico S.A.B. de C.V.	MXP370841019	Environment, Human rights	No
Hankook & Company Co., Ltd.	KR7000240002	Labour rights	No
HANKOOK TIRE & TECHNOLOGY Co., Ltd.	KR7161390000	Labour rights	Yes
HD HYUNDAI Co., Ltd.	KR7267250009	Labour rights	No
HD Hyundai Heavy Industries Co., Ltd.	KR7329180004	Labour rights	No
HD Korea Shipbuilding & Offshore Engineering Co., Ltd.	KR7009540006	Labour rights	Yes
Hugo Boss AG	DE000A1PHFF7	Labour rights	Yes
Iflytek Co., Ltd.	CNE100000B81	Human rights	No
JBS SA	BRJBSSACNOR8	Environment, Labour rights	No
Juventus Football Club SpA	IT0005572778	Corruption	Yes
Levi Strauss & Co.	US52736R1023	Labour rights	No
LG Electronics, Inc.	KR7066570003	Labour rights	No
Microsoft Corporation	US5949181045	Labour rights	No
PVH Corp.	US6936561009	Labour rights	No

<b>Robinhood Markets, Inc.</b>	US7707001027	Human rights	No
<b>Stellantis NV</b>	NL00150001Q9	Environment	No
<b>The AES Corporation</b>	US00130H1059	Environment, Human rights	No
<b>Uber Technologies, Inc.</b>	US90353T1007	Human rights, Labour rights	Yes
<b>Wilmar International Limited</b>	SG1T56930848	Environment	Yes

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