



NORM-BASED ENGAGEMENT

Q4 2024 Progress Report

January 2025

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INTRODUCTION

The Norm-Based Engagement Quarterly Report for Q4 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 Q4 2024:

- The second part of the report presents summary statistics of engagements initiated in Q4 2024.
- The third part highlights notable engagements carried out in Q4 2024.
- The fourth part provides summaries of engagement responses received in Q4 2024.
- The fifth part provides an overview of responsiveness to letters sent out in Q4 2024, as of 31 December 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.

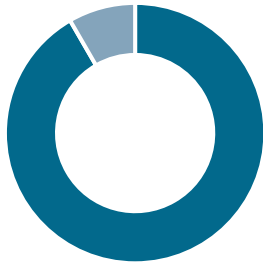
STATISTICS FOR ENGAGEMENT INITIATED IN Q4 2024

In Q4 2024, ISS ESG initiated Norm-Based Engagement on behalf of signatory investors with 24 companies, covering 44 individual ESG topics. Of these 24 companies, two were Red flagged and the remainder Amber flagged, according to ISS ESG’s Norm-Based Research methodology. By 31 December 2024, ISS ESG had received responses from 10 of the 24 companies to which investor enquiries had been sent on 15 October 2024. This constitutes an overall response rate of 42%. The statistics presented below are based on the companies with which engagement was initiated in Q4 2024.

Summary charts of engagements initiated between 1 October 2024 and 31 December 2024:

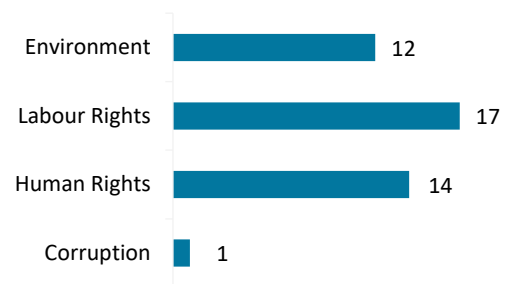
Verified or Alleged Failure to Respect Established Norms

Verified Norm Violation
(Red-flagged), 2



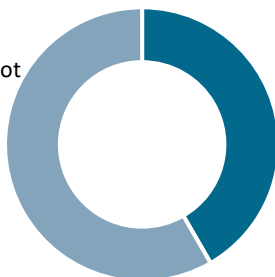
Alleged Norm Violation
(Amber-flagged), 22

Norm Area Breakdown



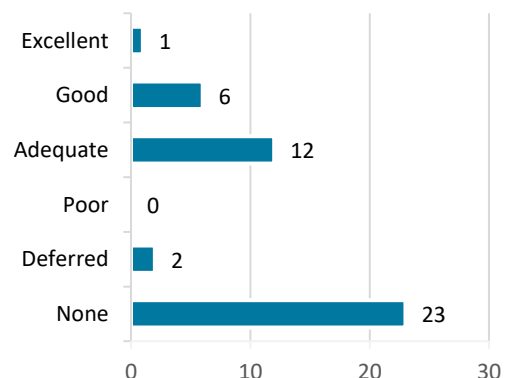
Response Rate

Response Not Received
58%



Response Received
42%

Quality of Participation



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

NOTABLE ENGAGEMENT ACTIVITY IN Q4 2024

The cases below are examples of notable Norm-Based Engagement activity carried out on behalf of participating investors in Q4 2024.

<p>Golden Agri-Resources Ltd</p>	<p>ISIN MU0117U00026</p>
<p>THEMES Indigenous rights Biodiversity, Deforestation</p>	<p>LOCATION Liberia, Indonesia</p>
<p>ACTIVITY SUMMARY</p>	<p>In Q4 2024, ISS ESG shared a letter with Golden Agri-Resources Ltd (GAR) on behalf of participating investors regarding the company’s controversies related to indigenous rights and deforestation at oil palm plantations in Liberia and indigenous rights controversy at oil palm plantations in Indonesia. In a written responses to ISS ESG’s investor enquiry in November 2024, the company addressed all three topics.</p> <p>Concerning indigenous rights in Liberia, the company was assessed to a good quality of participation. The company stated that its free, prior and informed consent (FPIC) approach has been updated and improved but implementation challenges remain. GAR shared that the Roundtable on Sustainable Palm Oil (RSPO) complaint against Golden Veroleum Liberia (GVL) has been closed as of 2023 and that it has taken significant steps to align its processes with the RSPO's principles and continues to refine its engagement with communities through its updated Sustainability Action Plan. GAR also stated that it conducts High Conservation Value (HCV)/High Carbon Stocks (HCS) assessments and draft remediation plans, which show a commitment to aligning with HCSA’s social and environmental requirements.</p> <p>Concerning deforestation in Liberia, the company was assessed to a good quality of participation. The company shared that following the complaint from HCSA, EF was commissioned to do an HCS/HCV assessment on all areas where GVL operates. EF completed this by the end of 2022 and its findings were the basis of remediation plans developed together with ProForest. The company further stated that a HCS remediation plan was developed, which is pending final survey by the authorities.</p> <p>Concerning indigenous rights in Indonesia, the company was assessed to a good quality of participation. The company shared that the status of FPIC remediation with the Dayak, Malay, and other affected communities in Indonesia has been marked as closed for each of the companies involved. GAR shared that the FPIC activities for the involved companies included community engagement and open consultations to address issues such as environmental management, land use, conflict resolution, and conservation.</p> <p>Based on the information GAR provided in this engagement dialogue, the company was assessed to have made positive progress on all engagement goals of the deforestation topic in Liberia, while the goal statuses for the indigenous rights in Liberia and deforestation in Indonesia topics remained unchanged. ISS ESG continues to monitor the efficacy of the company’s initiated measures to remedy the controversies.</p>

<p>Vale SA</p>	<p>ISIN BRVALEACNOR0</p>
<p>THEMES Biodiversity, Pollution, Soil pollution, Waste management, Water pollution Industrial accident, Workplace health and safety Access to water / sanitation, Indigenous rights, Living standards, Right to life, Stakeholder consultation</p>	<p>LOCATION Brazil</p>
<p>ACTIVITY SUMMARY</p>	<p>In Q4 2024, ISS ESG shared a letter with Vale SA on behalf of participating investors regarding the company’s controversies in Brazil concerning water pollution at Fundão dam, and safe and healthy working conditions and standard of living at the Córrego do Feijão mine. In a written responses to ISS ESG’s investor enquiry in December 2024, the company addressed all three topics.</p> <p>Concerning water pollution in Brazil, the company was assessed to an excellent quality of participation. The company stated that the Doce River water can be consumed after undergoing conventional treatment by the municipal supply systems and that monitoring of surface water quality and water supply quality is carried out by national laboratories certified by Brazilian standards. Vale also shared it is appealing the ongoing fishing ban and compensates fishermen. Furthermore, Vale highlighted that the Definitive Settlement Agreement was signed in October 2024, which provides for a total financial value of approximately R\$ 170 billion.</p> <p>Concerning safe and healthy working Brazil, the company was assessed to a good quality of participation. The company shared that its labour agreements were not made within the scope of the Integral Reparation Settlement, but the company entered into several compensation agreements with workers' unions. Vale has committed to remove all tailings storage structures at the highest emergency level by 2025 and has currently one dam remaining at that level. Vale also highlighted that it is in compliance with the Global Industry Standard on Tailings Management and has intensified its preventive, corrective, and monitoring actions on its structures including the creation of a Geotechnical Risk Committee. The company also shared that it has independent third-party audits of the ongoing reparation settlement.</p> <p>Concerning standard of living in Brazil, the company was assessed to an adequate quality of participation. The company referred to its public disclosures for details on remediation and shared information about its grievance mechanisms.</p> <p>Based on the information Vale provided in this engagement dialogue, the company was assessed to have made positive progress on all engagement goals of the safe and healthy working conditions and standard of living topics, while the goal statuses for the water pollution topic remained unchanged. ISS ESG continues to monitor the efficacy of the company’s initiated measures to remedy the controversies.</p>

COMPANY RESPONSES RECEIVED IN Q4 2024

The following pages list responses received during Q4 2024, for engagements that commenced in Q4 2024 or earlier. ISS ESG received responses from 27 companies during Q4, related to 49 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.

ACS, Actividades de Construccion y Servicios SA		ISIN ES0167050915
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world’s cultural and natural heritage, SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands	QUARTER Q2 2024
	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	
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
Anheuser-Busch InBev SA/NV		ISIN BE0974293251
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q4 2024
	THEME Union rights	
THEME Union rights		LOCATION Peru
DISCLOSURE		IMPLEMENTATION OF POLICIES

GOALS SET & PROGRESS ACHIEVED	Measures initiated	Commitment expressed
	REMEDIAL ACTION Commitment expressed	TERMINATION OF PRACTICE Commitment expressed

AntarChile SA		ISIN CLP0362E1386
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world’s cultural and natural heritage, SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q3 2024
THEME Indigenous rights		LOCATION Chile
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Measures initiated

Bank of America Corporation		ISIN US0605051046
	SDG ALIGNMENT N/A	QUARTER Q2 2024
THEME Business-to-consumer conduct, Consumer rights		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Measures initiated

Barrick Gold Corporation		ISIN CA0679011084
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.1: Reduce all forms of violence and related death rates everywhere SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials	QUARTER Q3 2024

THEME Human rights due diligence, Right to life, Torture / inhumane treatment		LOCATION Tanzania
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	REMEDIAL ACTION Commitment expressed	TERMINATION OF PRACTICE Commitment expressed
THEME Environmental impacts, Pollution, Waste management, Water pollution		LOCATION Argentina
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Measures initiated

Blackrock, Inc.		ISIN US09290D1019
	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
THEME Indigenous rights, Living standards, Stakeholder consultation		LOCATION Kenya
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	REMEDIAL ACTION Commitment expressed	TERMINATION OF PRACTICE Commitment expressed

Electricity Generating Public Company Limited		ISIN TH0465010005
	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, SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species 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	QUARTER Q4 2024

all levels, SDG 2: Zero Hunger; 2.1: End hunger and ensure access by all people to safe, nutritious and sufficient food		
THEME Biodiversity, Environmental impacts		LOCATION Laos
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Commitment expressed
THEME Forced displacement, Living standards, Stakeholder consultation		LOCATION Laos
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Commitment expressed

Empresas Copec SA		ISIN CLP7847L1080
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage, SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q3 2024
THEME Indigenous rights		LOCATION Chile
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Commitment expressed

Golden Agri-Resources Ltd		ISIN MU0117U00026
 	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage, SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels 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 Q4 2024

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		
THEME Indigenous rights		LOCATION Liberia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Commitment expressed
THEME Indigenous rights		LOCATION Indonesia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Commitment expressed
THEME Biodiversity, Deforestation		LOCATION Liberia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Commitment expressed

Hankook & Company Co., Ltd.		ISIN KR7000240002
	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 No measures announced	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE No measures announced

HANKOOK TIRE & TECHNOLOGY Co., Ltd.		ISIN KR7161390000
	<p>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</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

Hochtief AG		ISIN DE0006070006
	<p>SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world’s cultural and natural heritage, SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands SDG 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

Hugo Boss AG		ISIN DE000A1PHFF7
	SDG ALIGNMENT SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers SDG 8: Decent Work and Economic Growth; 8.7: Measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour	QUARTER Q3 2024
	THEME Union rights	LOCATION Turkey
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Measures initiated
THEME Forced labour, Human rights due diligence, Modern slavery, Religious affiliation discrimination (social), Social discrimination		LOCATION China
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Measures initiated

JBS SA		ISIN BRJBSSACNOR8
 	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 SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages, SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers SDG 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 Biodiversity, Deforestation	LOCATION Brazil
	GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated
REMEDIAL ACTION Commitment expressed		TERMINATION OF PRACTICE Commitment expressed

THEME Industrial accident, Workplace health and safety		LOCATION Brazil
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	REMEDIAL ACTION Commitment expressed	TERMINATION OF PRACTICE Commitment expressed
THEME Workplace health and safety		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	REMEDIAL ACTION Commitment expressed	TERMINATION OF PRACTICE Commitment expressed

Juventus Football Club SpA		ISIN IT0005572778
	SDG ALIGNMENT N/A	QUARTER Q3 2024
THEME Accounting / disclosure standards		LOCATION Italy
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	REMEDIAL ACTION Commitment expressed	TERMINATION OF PRACTICE Commitment expressed

NRG Energy, Inc.		ISIN US6293775085
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials	QUARTER Q2 2024
THEME Pollution, Soil pollution, Waste management, Water pollution		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	REMEDIAL ACTION Commitment expressed	TERMINATION OF PRACTICE Commitment expressed

Phillips 66		ISIN US7185461040
	<p>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</p>	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

Rio Tinto Limited		ISIN AU000000RIO1
 	<p>SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands, SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials</p> <p>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 10: Reduced Inequalities; 10.3: Equal opportunities of outcome, SDG 5: Gender Equality; 5.1: End all forms of discrimination against all women and girls, SDG 5: Gender Equality; 5.2: Eliminate all forms of violence against all women and girls, SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers</p> <p>SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands</p>	QUARTER Q4 2024
THEME Biodiversity, Pollution, Waste management, Water pollution		LOCATION Madagascar
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Measures initiated

THEME Human rights due diligence, Indigenous rights		LOCATION Australia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Measures initiated
THEME Gender discrimination (workplace), Racial discrimination (workplace), Sexual harassment (workplace), Workplace discrimination		LOCATION Australia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Measures initiated
THEME Biodiversity, Environmental impacts		LOCATION Chile
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES No measures announced
	REMEDIAL ACTION Commitment expressed	TERMINATION OF PRACTICE Commitment expressed

Rio Tinto Plc		ISIN GB0007188757
	<p>SDG ALIGNMENT</p> <p>SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands, SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials</p> <p>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 10: Reduced Inequalities; 10.3: Equal opportunities of outcome, SDG 5: Gender Equality; 5.1: End all forms of discrimination against all women and girls, SDG 5: Gender Equality; 5.2: Eliminate all forms of violence against all women and girls, SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers</p>	<p>QUARTER Q4 2024</p>

SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands		
THEME Biodiversity, Pollution, Waste management, Water pollution		LOCATION Madagascar
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Measures initiated
THEME Human rights due diligence, Indigenous rights		LOCATION Australia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Measures initiated
THEME Gender discrimination (workplace), Racial discrimination (workplace), Sexual harassment (workplace), Workplace discrimination		LOCATION Australia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Measures initiated
THEME Biodiversity, Environmental impacts		LOCATION Chile
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES No measures announced
	REMEDIAL ACTION Commitment expressed	TERMINATION OF PRACTICE Commitment expressed

Robinhood Markets, Inc.		ISIN US7707001027
	SDG ALIGNMENT N/A	QUARTER Q3 2024
THEME Consumer privacy, Consumer rights, Cybersecurity		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	REMEDIAL ACTION	TERMINATION OF PRACTICE

	Commitment expressed	Measures initiated
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Sojitz Corp.		ISIN JP3663900003
	SDG ALIGNMENT SDG 13: Climate Action; 13.3: Improve education, awareness-raising and human and institutional capacity on climate change	QUARTER Q4 2024
THEME Biodiversity, Climate change impacts, Environmental 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

Stellantis NV		ISIN NL00150001Q9
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q3 2024
THEME Air pollution, Pollution		LOCATION United States
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Measures initiated


The AES Corporation		ISIN US00130H1059
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world’s cultural and natural heritage, SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services, SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world’s cultural and natural heritage, SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q3 2024

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		
THEME Biodiversity, Environmental impacts		LOCATION Panama
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Commitment expressed
THEME Indigenous rights		LOCATION Panama
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Measures initiated
THEME Air pollution, Pollution, Waste management		LOCATION Chile
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Measures initiated
THEME Access to water / sanitation, Living standards, Stakeholder consultation		LOCATION Chile
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	REMEDIAL ACTION Measures initiated	TERMINATION OF PRACTICE Measures initiated
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
DISCLOSURE		IMPLEMENTATION OF POLICIES

GOALS SET & PROGRESS ACHIEVED	Measures initiated	Measures initiated
	REMEDIAL ACTION Commitment expressed	TERMINATION OF PRACTICE Commitment expressed

Uber Technologies, Inc.		ISIN US90353T1007
	<p>SDG ALIGNMENT</p> <p>SDG 10: Reduced Inequalities; 10.1: Achieve and sustain income growth, SDG 8: Decent Work and Economic Growth; 8.5: Achieve full and productive employment and decent work for all women and men, SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers</p> <p>SDG 10: Reduced Inequalities; 10.1: Achieve and sustain income growth, SDG 8: Decent Work and Economic Growth; 8.5: Achieve full and productive employment and decent work for all women and men, SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers</p> <p>SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages</p>	QUARTER Q3 2024
	THEME Working conditions	
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

Vale SA		ISIN BRVALEACNORO
<p>SDG ALIGNMENT</p> <p>SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services, SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels, SDG 2: Zero Hunger; 2.1: End hunger and ensure access by all people to safe, nutritious and sufficient food, SDG 3: Good Health and Wellbeing; Overarching: Ensure healthy lives and promote well-being for all at all ages, SDG 6: Clean Water and Sanitation; 6.1: Universal and equitable access to safe and affordable drinking water</p> <p>SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes, SDG 14: Life Below Water; 14.2: Sustainably manage and protect marine and coastal ecosystems, SDG 15: Life on Land; 15.1: Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands, SDG 6: Clean Water and Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials</p> <p>SDG 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>		<p>QUARTER Q4 2024</p>
<p>THEME Access to water / sanitation, Indigenous rights, Living standards, Right to life, Stakeholder consultation</p>		<p>LOCATION Brazil</p>
<p>GOALS SET & PROGRESS ACHIEVED</p>	<p>DISCLOSURE Measures initiated</p>	<p>IMPLEMENTATION OF POLICIES Commitment expressed</p>
	<p>REMEDIAL ACTION Commitment expressed</p>	<p>TERMINATION OF PRACTICE Commitment expressed</p>
<p>THEME Biodiversity, Pollution, Soil pollution, Waste management, Water pollution</p>		<p>LOCATION Brazil</p>
<p>GOALS SET & PROGRESS ACHIEVED</p>	<p>DISCLOSURE Measures initiated</p>	<p>IMPLEMENTATION OF POLICIES Measures initiated</p>
	<p>REMEDIAL ACTION Measures initiated</p>	<p>TERMINATION OF PRACTICE Measures initiated</p>
<p>THEME Industrial accident, Workplace health and safety</p>		<p>LOCATION Brazil</p>
<p>GOALS SET & PROGRESS ACHIEVED</p>	<p>DISCLOSURE Commitment expressed</p>	<p>IMPLEMENTATION OF POLICIES Measures initiated</p>
	<p>REMEDIAL ACTION Measures initiated</p>	<p>TERMINATION OF PRACTICE Measures initiated</p>

Woolworths Group Limited		ISIN AU000000WOW2
	SDG ALIGNMENT N/A	QUARTER Q4 2024
THEME Consumer privacy, Consumer rights, Cybersecurity		LOCATION Australia
GOALS SET & PROGRESS ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	REMEDIAL ACTION Commitment expressed	TERMINATION OF PRACTICE No measures announced

ENGAGEMENTS INITIATED IN Q4 2024

The following table provides an overview of the responsiveness to the engagements initiated in Q4 through the letters sent on 15 October 2024, as of 31 December 2024. Companies that had yet to respond to the initial engagement letters were sent reminder notifications on 16 December 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
Anheuser-Busch InBev SA/NV	BE0974293251	Labour rights	Yes
Apple Inc.	US0378331005	Corruption, Human rights, Labour rights	No
Carrefour SA	FR0000120172	Labour rights	No
Coal India Ltd.	INE522F01014	Environment, Labour rights	No
COFCO Sugar Holding Co. Ltd.	CNE000000LH8	Labour rights	No
Electricity Generating Public Company Limited	TH0465010005	Environment, Human rights	Yes
Enbridge Inc.	CA29250N1050	Human rights	Yes
Golden Agri-Resources Ltd	MU0117U00026	Environment, Human rights	Yes
JD Sports Fashion Plc	GB00BM8Q5M07	Human rights	No
Kohls Corporation	US5002551043	Labour rights	No
Macy's, Inc.	US55616P1049	Labour rights	No
Meta Platforms, Inc.	US30303M1027	Human rights, Labour rights	No
NextEra Energy, Inc.	US65339F1012	Environment	No
Pegatron Corp.	TW0004938006	Labour rights	Yes
Rio Tinto Limited	AU000000RIO1	Environment, Human rights, Labour rights	Yes
Rio Tinto Plc	GB0007188757	Environment, Human rights, Labour rights	Yes
Shandong Gold Mining Co., Ltd.	CNE1000036N7	Environment	No
Sojitz Corp.	JP3663900003	Environment	Yes
Suncor Energy Inc.	CA8672241079	Environment	No
Target Corporation	US87612E1064	Labour rights	No

Texhong International Group Limited	KYG876551170	Labour rights	No
Urban Outfitters, Inc.	US9170471026	Labour rights	No
Vale SA	BRVALEACNOR0	Environment, Human rights, Labour rights	Yes
Woolworths Group Limited	AU000000WOW2	Human rights	Yes

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