



2019 ENGAGEMENT REPORT

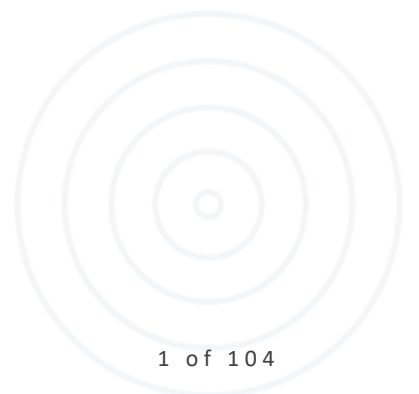


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ENGAGEMENT STRATEGY

SPK'S STRATEGY FOR ENGAGEMENT

SPK only invest in pooled fund vehicles and therefore direct interaction with companies and their management is naturally limited.

The Pooled Engagement service provides us with an additional tool besides the direct dialogue we have with our external managers and sits well with our overall approach of affecting rather than excluding.

SPK uses the Pooled Engagement service of ISS ESG to help facilitate its engagement activities. For more information about ISS ESG and the Pooled Engagement service, we refer you to Appendix A to this report.

THE POOLED ENGAGEMENT PROCESS

Pooled Engagement focuses on companies that are assessed under ISS ESG's Norm-Based Research service to be involved in alleged or verified severe, systematic or systemic failures to respect international norms. At the outset of engagement, clear and actionable objectives are defined on the basis of expectations on the company's ability to address shortcomings in the context of its specific business sector and relevant industry standards. These objectives fall under four key categories (Disclosure, Implementation, Remediation, Termination) and progress is measured against four milestones (No measure announced, Commitment expressed, Measures initiated, Credible measures adopted).

Information provided by the company through the dialogue and interactions under the Pooled Engagement process is assessed against the objectives established at the outset of engagement and a decision is then taken on the outcome of the engagement. Where the fulfilment of the objectives has been met and a determination made that the controversy, or the risk thereof has been resolved, the engagement will be closed. If there is insufficient information to determine whether the fulfilment of objectives have been met the engagement will be extended. Alternatively, where there is a poor outlook for the achievement of objectives for the engagement, the engagement will be discontinued.



DEFINE OBJECTIVE

E.g. insights into poor practice, policy update, policy implementation



CONDUCT DIALOGUE

Formal letters, phone, email, conference calls, meetings



ASSESS RESPONSE

Verify response with stakeholders and experts, evaluate against assessment



END

Close (objectives met)
OR Extend (insufficient information)
OR Discontinue (poor outlook)

THE ENGAGEMENT CYCLE

The engagement cycle is initiated with the outreach to the company. Over time, responsiveness is noted with most companies with which engagement is sought. Others require repeated follow-ups to respond, and some steadfastly fail to respond to investor concerns. To address these challenges in communication, regular and courteous follow-up is built into the Pooled Engagement approach. Once every effort has been made to engage both Investor Relations and a company's Executive Management, the feasibility of engagement is re-evaluated.



MONTH 1

Engagement letter or meeting invitation to establish contact



MONTH 2-5

Reminder



MONTH 6-7

Letter to CEO



MONTH 8

Escalation to Board



MONTH 12

Re-evaluation

ENGAGEMENT RESULTS

OVERALL ENGAGEMENT STATISTICS

SPK participated in 149 separate company engagements held during 2019. The engagements were facilitated by SPK's ESG service provider, ISS ESG. The statistics below present an overview of companies' subject to engagement outreach.

56% of 149 companies provided responses to the investor outreach. In contrast to previous years, 2019 saw a spike in the social issues that were engaged on.

Charts 1-4: Summary charts of engagements initiated and conducted for the period commencing 1st January 2019 to the 31st December 2019

Chart 1

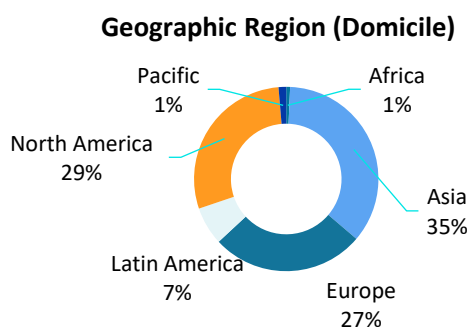


Chart 2

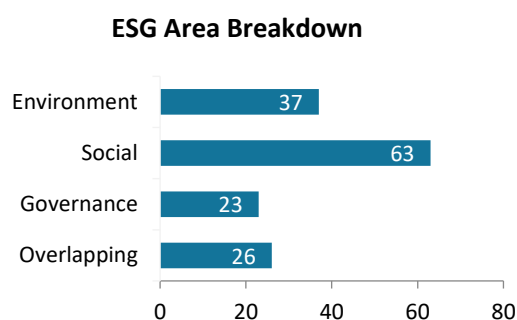


Chart 3

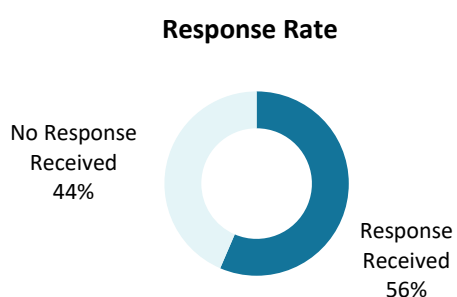
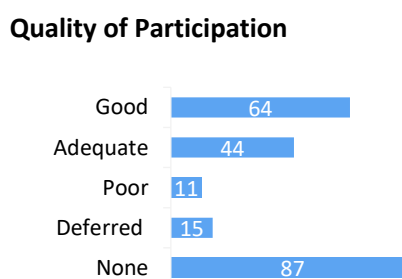


Chart 4



ENGAGEMENT THEMES IN 2019

ISS ESG conducted 149 engagements in total during 2019, covering 221 individual ESG topics across 62 different locations across the globe.

The engagements are categorized under the four UN Global Compact areas: human rights; labour rights; environment and anti-corruption. Union rights were the dominant labour rights theme, with a focus on working conditions following. The majority of environment-focused engagements related to corporate management of incidences involving water, air, and soil pollution. For companies facing controversies on their anti-corruption management systems, engagement focused on their efforts to address reported incidences of bribery and money laundering. The following table provides an overview of major engagement themes in 2019.

Table 1: Major engagement themes in 2019 based on topic area (multiple topic areas may be relevant under an individual engagement)

UN GLOBAL COMPACT PRINCIPLES	NORM AREA		TOPIC AREA
1-2		Human Rights	Living standards
			Poor stakeholder consultation
3-6		Labour Rights	Union rights
			Just and favourable conditions of work
7-9		Environment	Pollution (air, water and soil)
			Depletion of biodiversity
10		Anti-Corruption	Bribery
			Money laundering

2019 ENGAGEMENT DETAILS

ENGAGEMENTS IN 2019

The following lists all engagement dialogues that were held during 2019. Where dialogue was established, the tables presents the milestones achieved against the objectives for the engagement.


For companies that did not provide an initial response, reminders were submitted to the investor relations department, to the attention of the CEO and, ultimately, to the attention of the Board Chairperson within a 12-month period. For these companies, information is provided on the status of the reminder and escalation process.


Dialogues held in the year ending 31 December 2019


AbbVie, Inc.			ISIN US00287Y1091
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q1 2019	
THEME Bribery			LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated	
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A	


Aegea Saneamento e Participações SA			ISIN US00775CAA45
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q1 2019	
THEME Bribery			LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed	
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A	

ALROSA PJSC			ISIN RU0007252813
	SDG ALIGNMENT	QUARTER Q2 2019	


	SDG 6: Clean Water & Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials; SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers		
THEME Environmental impacts: Pollution; Depletion of biodiversity			LOCATION Russia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated	
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated	
THEME Working conditions: Occupational health and safety			LOCATION Russia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated	
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Credible measures adopted	
Amazon.com, Inc.			ISIN US0231351067
	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 17: Partnerships for the Goals; 17.1: Strengthen domestic resource mobilization		QUARTER Q1 2019
THEME Working conditions			LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed	
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION N/A	
THEME Taxation			LOCATION Luxembourg
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced	
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION N/A	


Anheuser-Busch InBev SA/NV			ISIN AU3CB0231827
	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 2019
THEME Working conditions: Union rights			LOCATION Peru
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated	
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed	
THEME Working conditions			LOCATION India
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated	
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed	


Bayer AG			ISIN XS0225369403
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms		QUARTER Q1 2019
THEME Bribery			LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Credible measures adopted	
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A	

Biogen, Inc.			ISIN US09062X1037
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms		QUARTER Q1 2019
THEME Bribery			LOCATION United States


GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A


Bombardier, Inc.		ISIN CA0977512007
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q4 2019
THEME Bribery		LOCATION Azerbaijan
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A


BP Plc		ISIN US0556221044
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q1 2019
THEME Stakeholder consultation: Pollution; Living standards		LOCATION Italy
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION N/A

CaixaBank SA		ISIN ES0140609019
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.4: Reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organized crime	QUARTER Q3 2018
THEME Money laundering		LOCATION Spain
DISCLOSURE		IMPLEMENTATION OF POLICIES


GOALS SET & MILESTONES ACHIEVED	Credible measures adopted	Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A


CITIC Ltd.		ISIN HK0267001375
	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 Q1 2018
THEME Indigenous rights		LOCATION Peru
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION N/A


Companhia Paranaense de Energia		ISIN BRCPLEACNPB9
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage	QUARTER Q2 2019
THEME Environmental impacts: Depletion of biodiversity		LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A

Corporación Financiera Colombiana SA		ISIN COJ12PA00048
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q4 2018
THEME Bribery		LOCATION Colombia
DISCLOSURE		IMPLEMENTATION OF POLICIES

GOALS SET & MILESTONES ACHIEVED	Credible measures adopted	No measures announced
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A


Daimler AG		ISIN DE0007100000
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q3 2019
THEME Environmental impacts: Air pollution		LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated


Danske Bank A/S		ISIN XS0214318007
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.4: Reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organized crime	QUARTER Q4 2018
THEME Money laundering		LOCATION Estonia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Credible measures adopted	REMEDIAL ACTION Measures initiated


Enagás SA		ISIN ES0130960018
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q1 2019
THEME Stakeholder consultation: Pollution; Living standards		LOCATION Italy
DISCLOSURE Measures initiated		IMPLEMENTATION OF POLICIES


GOALS SET & MILESTONES ACHIEVED		Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION N/A
Eni SpA		ISIN IT0003132476
	<p>SDG ALIGNMENT</p> <p>SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals;</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms;</p> <p>SDG 10: Reduced Inequalities; 10.1: Achieve and sustain income growth;</p> <p>SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers</p>	QUARTER Q2 2019
THEME Environmental impact: Air, water and soil pollution		LOCATION Nigeria
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated
THEME Bribery		LOCATION Algeria
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES N/A
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION No measures announced
THEME Bribery		LOCATION Nigeria
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES N/A
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A
THEME Bribery		LOCATION Kazakhstan
	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced


GOALS SET & MILESTONES ACHIEVED	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A
THEME Working conditions	LOCATION Nigeria	
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced

Entergy Corp.		ISIN US29364GAF00
	SDG ALIGNMENT SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning	QUARTER Q1 2019
THEME Climate change	LOCATION United States	
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION N/A


EXOR NV		ISIN IT0001353140
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q3 2019
THEME Air pollution	LOCATION United States	
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced

Exxon Mobil Corp.			ISIN US30231G1022
	SDG ALIGNMENT SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning		QUARTER Q1 2019
THEME Climate change			LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed	
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION N/A	


Evergy, Inc.			ISIN US30034W1062
	SDG ALIGNMENT SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning		QUARTER Q1 2019
THEME Climate change			LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced	
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION N/A	

Facebook, Inc.			ISIN US30303M1027
	SDG ALIGNMENT N/A		QUARTER Q2 2019
THEME Social discrimination			LOCATION Myanmar
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Credible measures adopted	
	TERMINATION OF PRACTICE Credible measures adopted	REMEDIAL ACTION Credible measures adopted	
THEME Cybersecurity			LOCATION EU
	DISCLOSURE	IMPLEMENTATION OF POLICIES	


GOALS SET & MILESTONES ACHIEVED	Measures initiated	Commitment expressed
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated


FGV Holdings Bhd.		ISIN MYL522200004
	SDG ALIGNMENT SDG 15: Life on Land; 15.2: Sustainable management of all types of forests	QUARTER Q1 2019
THEME Environmental impacts: Deforestation		LOCATION Indonesia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION N/A


Fiat Chrysler Automobiles NV		ISIN NL0010877643
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q3 2019
THEME Environmental impacts: Air pollution		LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION No measures announced

First Pacific Co. Ltd.		ISIN BMG348041077
	SDG ALIGNMENT SDG 10: Reduced Inequalities; 10.3: Equal opportunities of outcome; 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 2019
THEME Working conditions		LOCATION Indonesia


GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated


G4S Plc		ISIN GB00B01FLG62
	SDG ALIGNMENT SDG 3: Good Health and Wellbeing; 3.4: Reduce by one third premature mortality from non-communicable diseases; 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 Q3 2019
THEME Children's rights		LOCATION United Kingdom
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION No measures announced

Gazprom Neft PJSC		ISIN RU0009062467
	SDG ALIGNMENT SDG 14: Life Below Water; 14.2: Sustainably manage and protect marine and coastal ecosystems	QUARTER Q1 2019
THEME Environmental impacts		LOCATION Russia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION N/A


Gazprom PJSC		ISIN RU0007661625
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage	QUARTER Q1 2019


THEME Environmental impacts		LOCATION Russia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION N/A


Golden Agri-Resources Ltd.		ISIN MU0117U00026
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q2 2019
THEME Bribery		LOCATION Indonesia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Credible measures adopted
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A

Grupo México S.A.B. de C.V.		ISIN MXP370841019
	SDG ALIGNMENT SDG 6: Clean Water & Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials; SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q2 2019
THEME Environmental impacts: Air, water, soil pollution		LOCATION Mexico
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION No measures announced
THEME Human rights		LOCATION Peru
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE	REMEDIAL ACTION


	Commitment expressed	N/A
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Indivior PLC		ISIN GB00BRS65X63
	SDG ALIGNMENT N/A	QUARTER Q3 2019
THEME Consumer rights		LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES N/A
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated



Indofood Agri Resources Ltd.		ISIN SG1U47933908
	SDG ALIGNMENT 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; SDG 10: Reduced Inequalities; 10.3: Equal opportunities of outcome	QUARTER Q3 2019
THEME Working conditions		LOCATION Indonesia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated

ING Groep NV		ISIN US456837AC74
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.4: Reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organized crime	QUARTER Q3 2019
THEME Money laundering		LOCATION Netherlands
	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced


GOALS SET & MILESTONES ACHIEVED	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated
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JBS SA		ISIN USP59695AC39
	<p>SDG ALIGNMENT</p> <p>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; 15.2: Sustainable management of all types of forests;</p> <p>SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species;</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms</p>	QUARTER Q4 2019
THEME Environmental impacts: Deforestation; Depletion of biodiversity		LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION No measures announced
THEME Working conditions: Occupational health and safety		LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced
THEME Bribery		LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION No measures announced

Jindal Steel & Power Ltd.		ISIN INE749A01030
	<p>SDG ALIGNMENT</p> <p>SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services;</p>	QUARTER Q3 2018


	SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms; SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels		
THEME Bribery			LOCATION India
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced	
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A	
THEME Stakeholder consultation: Living standards; Water			LOCATION Mozambique
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced	
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION N/A	
KBC Group NV			
			ISIN BE0003565737
	SDG ALIGNMENT N/A		QUARTER Q2 2018
THEME Consumer rights			LOCATION Ireland
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Credible measures adopted	
	TERMINATION OF PRACTICE Credible measures adopted	REMEDIAL ACTION N/A	
Keppel Corp. Ltd.			
			ISIN SG1U68934629
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms		QUARTER Q2 2018
THEME Bribery			LOCATION Brazil
	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES	

GOALS SET & MILESTONES ACHIEVED		Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated


Korea Electric Power Corp.		ISIN KR7015760002
	<p>SDG ALIGNMENT</p> <p>SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services;</p> <p>SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning;</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.1: Reduce all forms of violence and related death rates everywhere</p>	QUARTER Q4 2018
THEME Environmental impacts: Climate change		LOCATION South Africa
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION N/A
THEME Stakeholder consultation: Living standards		LOCATION Cambodia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated
THEME Stakeholder consultation: Living standards		LOCATION Laos
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated

Loomis AB		ISIN SE0002683557
	<p>SDG ALIGNMENT</p> <p>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 2019


THEME Working conditions		LOCATION Turkey
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION No measures announced


MDU Resources Group, Inc.		ISIN US5526901096
	SDG ALIGNMENT SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning	QUARTER Q1 2019
THEME Climate change		LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION N/A


MMC Norilsk Nickel PJSC		ISIN RU0007288411
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q2 2019
THEME Environmental impacts: Air pollution; Right to health		LOCATION Russia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Commitment expressed

National Express Group Plc		ISIN GB0006215205
	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 2017
THEME Working conditions: Union rights		LOCATION United States


GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Credible measures adopted
	TERMINATION OF PRACTICE Credible measures adopted	REMEDIAL ACTION N/A


NHPC Ltd.		ISIN INE848E01016
	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 2018
THEME Indigenous rights; Environmental impacts		LOCATION India
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION N/A


NorthWestern Corp.		ISIN US6680743050
	SDG ALIGNMENT SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning	QUARTER Q1 2019
THEME Climate change		LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION N/A

Oil Co. LUKOIL PJSC		ISIN RU0009024277
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q3 2019
THEME Environmental impacts: Pollution; Oil spills		LOCATION Russia


GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Measures initiated


Peab AB		ISIN SE0000106205
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q1 2019
THEME Bribery		LOCATION Sweden
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Credible measures adopted
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A

Peabody Energy Corp.		ISIN US7045491047
	SDG ALIGNMENT SDG 13: Climate Action; 13.3: Improve education, awareness-raising and human and institutional capacity on climate change	QUARTER Q1 2019
THEME Climate change		LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION N/A




Petróleo Brasileiro SA		ISIN BRPETRACNOR9
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes; SDG 14: Life Below Water; 14.2: Sustainably manage and protect marine and coastal ecosystems; SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q4 2019

THEME Bribery		LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Credible measures adopted
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Credible measures adopted
THEME Environmental impacts: Oil spills; Depletion of biodiversity		LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced


PG&E Corp.		ISIN US69331C1080
	SDG ALIGNMENT N/A	QUARTER Q4 2019
THEME Consumer health and safety		LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Credible measures adopted

POSCO		ISIN US6934831099
	<p>SDG ALIGNMENT</p> <p>SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services;</p> <p>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;</p> <p>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; 15.2: Sustainable management of all types of forests, 15.5: Protect and prevent the extinction of threatened species</p>	QUARTER Q1 2019


THEME Indigenous rights		LOCATION India
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION N/A
THEME Environmental impacts: Illegal logging; Depletion of biodiversity		LOCATION Indonesia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Commitment expressed
THEME Living standards: Forced displacement; Right to life		LOCATION Myanmar
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION N/A
THEME Working conditions: Union rights		LOCATION Turkey
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced
THEME Forced labour		LOCATION Uzbekistan
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION N/A


POSCO INTERNATIONAL Corp.		ISIN KR7047050000
  	SDG ALIGNMENT SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services;	QUARTER Q1 2019

<p>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;</p> <p>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; 15.2: Sustainable management of all types of forests, 15.5: Protect and prevent the extinction of threatened species</p>			
THEME Environmental impacts: Illegal logging; Depletion of biodiversity			LOCATION Indonesia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed	
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Commitment expressed	
THEME Living standards: Forced displacement; Right to life			LOCATION Myanmar
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced	
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION N/A	
THEME Working conditions: Union rights			LOCATION Turkey
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed	
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced	
THEME Forced labour			LOCATION Uzbekistan
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed	
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION N/A	


Prosegur Compañía de Seguridad SA			ISIN ES0175438235
	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 2018


THEME Working conditions: Union rights		LOCATION Colombia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Credible measures adopted
	TERMINATION OF PRACTICE Credible measures adopted	REMEDIAL ACTION Credible measures adopted

PT Indofood Sukses Makmur Tbk		ISIN ID1000057003
	SDG ALIGNMENT SDG 10: Reduced Inequalities; 10.3: Equal opportunities of outcome 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 2019
THEME Working conditions		LOCATION Indonesia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated


PT Perusahaan Perkebunan London Sumatra Indonesia Tbk		ISIN ID1000082407
	SDG ALIGNMENT SDG 10: Reduced Inequalities; 10.3: Equal opportunities of outcome 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 2019
THEME Working conditions		LOCATION Indonesia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated


PT Salim Ivomas Pratama Tbk			ISIN ID1000119100
	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 Q3 2019
THEME Working conditions: Union rights			LOCATION Colombia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed	
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated	

Pyxus International, Inc.			ISIN US0187721032
	SDG ALIGNMENT 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; SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers		QUARTER Q3 2018
THEME Working conditions			LOCATION Zimbabwe
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced	
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION N/A	

Renault SA			ISIN FR0000131906
	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 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes		QUARTER Q3 2019
THEME Environmental impacts: Air pollution			LOCATION France
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES No measures announced	
	TERMINATION OF PRACTICE	REMEDIAL ACTION	

	N/A	Measures initiated
THEME Working conditions: Union rights		LOCATION Turkey
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

Rosneft Oil Co.		ISIN RU000A0J2Q06
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage; SDG 14: Life Below Water; 14.2: Sustainably manage and protect marine and coastal ecosystems	QUARTER Q4 2019
THEME Environmental impacts: Air, water and soil pollution		LOCATION Russia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed

Royal Dutch Shell Plc		ISIN GB00B03MM408
	SDG ALIGNMENT	QUARTER Q4 2019
THEME Working conditions		LOCATION Nigeria
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced
THEME Living standards: Health; Stakeholder consultation		LOCATION Nigeria
	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated

GOALS SET & MILESTONES ACHIEVED	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Commitment expressed
THEME Pollution		LOCATION Nigeria
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION Measures initiated


Ryanair Holdings Plc		ISIN US7835131043
	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 Q1 2019
THEME Working conditions: Union rights		LOCATION Netherlands
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced
THEME Working conditions: Union rights; Living wage		LOCATION Belgium
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION No measures announced
THEME Working conditions: Union rights		LOCATION Italy
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Credible measures adopted
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated
THEME Working conditions: Union rights		LOCATION Portugal
	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES


GOALS SET & MILESTONES ACHIEVED		Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated
THEME Working conditions: Union rights		LOCATION Spain
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

Sanofi		ISIN US80105NAG07
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q1 2019
THEME Bribery		LOCATIONS Bahrain
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A
THEME Bribery		LOCATIONS Disputed Territories
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A
THEME Bribery		LOCATIONS Jordan
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A
THEME Bribery		LOCATIONS Kazakhstan
	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated


GOALS SET & MILESTONES ACHIEVED	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A
THEME Bribery		LOCATIONS Kuwait
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A
THEME Bribery		LOCATIONS Lebanon
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A
THEME Bribery		LOCATIONS Oman
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A
THEME Bribery		LOCATIONS Qatar
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A
THEME Bribery		LOCATIONS United Arab Emirates,
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A
THEME Bribery		LOCATIONS United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE	REMEDIAL ACTION


	N/A	N/A
THEME Bribery		LOCATIONS Yemen
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A


SBM Offshore NV		ISIN NL0000360618
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q3 2018
THEME Bribery		LOCATIONS Angola, Equatorial Guinea, Iraq, Kazakhstan
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Credible measures adopted
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A
THEME Bribery		LOCATIONS Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Credible measures adopted	IMPLEMENTATION OF POLICIES Credible measures adopted
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A

SK Holdings Co., Ltd.		ISIN KR7034730002
	SDG ALIGNMENT SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services	QUARTER Q4 2018
THEME Stakeholder consultation: Living standards		LOCATION Cambodia
	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated


GOALS SET & MILESTONES ACHIEVED	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A
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SK Innovation Co., Ltd.		ISIN KR7096770003
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage	QUARTER Q3 2017
THEME Indigenous rights		LOCATION Peru
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION N/A

SLC Agricola SA		ISIN BRS LCEACNOR2
	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 Q1 2019
THEME Climate change		LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION N/A


Southern Copper Corp.		ISIN US84265VAA35
	SDG ALIGNMENT SDG 6: Clean Water & Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials	QUARTER Q2 2019
THEME Environmental Impacts: Pollution; Poor waste management		LOCATION Mexico
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced

GOALS SET & MILESTONES ACHIEVED	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION No measures announced
THEME Stakeholder consultation: Living standards; Right to water		LOCATION Peru
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION N/A


Swedbank AB		ISIN SE0001877739
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.4: Reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organized crime	QUARTER Q4 2019
THEME Money laundering		LOCATION Estonia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated


Tesla, Inc.		ISIN US88160R1014
	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 Q3 2019
THEME Working conditions: Union rights		LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced


The Boeing Co.		ISIN US0970231058
	SDG ALIGNMENT	QUARTER

	N/A		Q4 2019
THEME Right to life			LOCATION Ethiopia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed	
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated	
THEME Right to life			LOCATION Indonesia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed	
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated	
THEME Consumer rights; Right to life			LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed	
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated	
The GEO Group, Inc.			ISIN US36159R1032
	SDG ALIGNMENT 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 SDG 10: Reduced Inequalities; 10.7: Facilitate orderly, safe, regular and responsible migration		QUARTER Q3 2019
THEME Human rights due diligence			LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Commitment expressed	
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced	
THEME Forced labour			LOCATION United States
	DISCLOSURE	IMPLEMENTATION OF POLICIES	


GOALS SET & MILESTONES ACHIEVED	Commitment expressed	Commitment expressed
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced


The Goldman Sachs Group, Inc.		ISIN US38141EA257
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q3 2019
THEME Bribery		LOCATION United Arab Emirates
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION No measures announced


Tokyo Electric Power Co. Holdings, Inc.		ISIN JP3585800000
	SDG ALIGNMENT SDG 14: Life Below Water; 14.2: Sustainably manage and protect marine and coastal ecosystems	QUARTER Q2 2019
THEME Environmental impacts: Radioactive pollution		LOCATION Japan
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated

Top Glove Corp. Bhd.		ISIN MYL711300003
	SDG ALIGNMENT 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; SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q2 2019
THEME		LOCATION


Working conditions		Malaysia
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Measures initiated

Total SA		ISIN US89151E1091
	SDG ALIGNMENT SDG 6: Clean Water & Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials	QUARTER Q4 2018
THEME Environmental impacts: Pollution		LOCATION Nigeria
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION N/A

UnitedHealth Group, Inc.		ISIN US91324PAX06
	SDG ALIGNMENT SDG 3: Good Health and Wellbeing; 3.8: Achieve universal health coverage	QUARTER Q3 2019
THEME Consumer rights: Deceptive and misleading practices		LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION No measures announced


Universal Corp.		ISIN US9134561094
	SDG ALIGNMENT 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 2018


	SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	
THEME Working conditions: Occupational health and safety		LOCATION Zimbabwe
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Credible measures adopted
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION N/A

Vale SA		ISIN US91912E1055
	SDG ALIGNMENT SDG 6: Clean Water & Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials; SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q2 2019
THEME Environmental impacts: Pollution; Waste management; Depletion of biodiversity		LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Commitment expressed
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated
THEME Working conditions: Occupational health and safety		LOCATION Brazil
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated

Vestas Wind Systems A/S		ISIN DK0010268606
	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 2019
THEME Indigenous rights		LOCATION Kenya
	DISCLOSURE	IMPLEMENTATION OF POLICIES


GOALS SET & MILESTONES ACHIEVED	No measures announced	No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION Commitment expressed
THEME Working conditions: Occupational health and safety		LOCATION Spain
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION Commitment expressed

Volkswagen AG		ISIN DE0007664005
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q3 2019
THEME Environmental impacts: Pollution		LOCATION Germany
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Measures initiated
THEME Environmental impacts: Pollution		LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION Credible measures adopted

Wal-Mart de México SAB de CV		ISIN MXP810081010
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q2 2019
THEME Bribery		LOCATION Mexico
	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES Credible measures adopted

GOALS SET & MILESTONES ACHIEVED	TERMINATION OF PRACTICE N/A	REMEDIAL ACTION N/A
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Walmart, Inc.	ISIN US9311421039
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	<p>SDG ALIGNMENT</p> <p>SDG 5: Gender Equality; 5.1: End all forms of discrimination against all women and girls;</p> <p>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 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 2019</p>
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THEME Workplace discrimination: Gender	LOCATION United Kingdom
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GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION No measures announced

THEME Working conditions: Union rights	LOCATION United States
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GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Commitment expressed	IMPLEMENTATION OF POLICIES Measures initiated
	TERMINATION OF PRACTICE Measures initiated	REMEDIAL ACTION No measures announced

Weyerhaeuser Co.	ISIN US962166BV52
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	<p>SDG ALIGNMENT</p> <p>SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage</p>	<p>QUARTER Q2 2019</p>
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THEME Indigenous rights	LOCATION Canada
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GOALS SET & MILESTONES ACHIEVED	DISCLOSURE Measures initiated	IMPLEMENTATION OF POLICIES No measures announced
	TERMINATION OF PRACTICE Commitment expressed	REMEDIAL ACTION N/A




Whirlpool Corp.			ISIN US96332HCD98
	SDG ALIGNMENT SDG 17: Partnerships for the Goals; 17.1: Strengthen domestic resource mobilization	QUARTER Q3 2018	
THEME Taxation			LOCATION United States
GOALS SET & MILESTONES ACHIEVED	DISCLOSURE No measures announced	IMPLEMENTATION OF POLICIES No measures announced	
	TERMINATION OF PRACTICE No measures announced	REMEDIAL ACTION N/A	

Unresponsive companies as at 31 December 2019


Adani Enterprises Ltd.			ISIN INE423A01024
	SDG ALIGNMENT SDG 6: Clean Water & Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials; SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage; SDG 13: Climate Action; 13.3: Improve education, awareness-raising and human and institutional capacity on climate change; SDG 14: Life Below Water; 14.2: Sustainably manage and protect marine and coastal ecosystems	QUARTER Q1 2019	
THEME Environmental impacts: Climate change; Depletion of biodiversity; Illegal logging			LOCATION Australia; India
STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board, the engagement will be re-evaluated.			


AMP Ltd.			ISIN AU000000AMP6
	SDG ALIGNMENT N/A	QUARTER Q4 2018	
THEME Consumer Rights			LOCATION Australia
STATUS OF ENGAGEMENT			


Engagement has been suspended as the company has failed to respond to engagement outreach (in spite of reminder and the escalation process).

AUDI AG		ISIN DE0006757008
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q3 2019
THEME Environmental Impacts: Pollution		LOCATION Germany; United States
STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the CEO, the enquiry will be sent to the Board.		
Bilfinger SE		ISIN DE0005909006
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q1 2018
THEME Bribery		LOCATION Brazil
STATUS OF ENGAGEMENT Engagement has been suspended as the company has failed to respond (in spite of reminder and the escalation process).		
BLD Plantation Bhd.		ISIN MYL506900009
	SDG ALIGNMENT SDG 13: Climate Action; 13.3: Improve education, awareness-raising and human and institutional capacity on climate change; 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 Q4 2019
THEME Climate Change; Environmental impacts: Depletion of biodiversity; Deforestation		LOCATION Malaysia
STATUS OF ENGAGEMENT		


The company has yet to respond to outreach in Q4 2019. As such, it is subject to the reminder and escalation process and a reminder will be sent to its Investor Relations Department.


Bunge Ltd.		ISIN BMG169621056
	SDG ALIGNMENT SDG 15: Life on Land; 15.2: Sustainable management of all types of forests	QUARTER Q4 2019
THEME Environmental impacts: Deforestation; Depletion of biodiversity		LOCATION Brazil
STATUS OF ENGAGEMENT The company has yet to respond to outreach in Q4 2019. As such, it is subject to the reminder and escalation process and a reminder will be sent to its Investor Relations Department.		


Cal-Comp Electronics (Thailand) Public Co., Ltd.		ISIN TH0639010R13
	SDG ALIGNMENT 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; SDG 10: Reduced Inequalities; 10.7: Facilitate orderly, safe, regular and responsible migration	QUARTER Q4 2019
THEME Working conditions: Forced labour		LOCATION Thailand
STATUS OF ENGAGEMENT The company has yet to respond to outreach in Q4 2019. As such, it is subject to the reminder and escalation process and a reminder will be sent to its Investor Relations Department.		





Cargill, Inc.		ISIN US141781AX24
	SDG ALIGNMENT 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; 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 Q4 2019
THEMES		LOCATION

Environmental Impacts: Deforestation; Depletion of biodiversity and Forced labour	Brazil and Uzbekistan
<p>STATUS OF ENGAGEMENT</p> <p>The company has yet to respond to outreach in Q4 2019. As such, it is subject to the reminder and escalation process and a reminder will be sent to its Investor Relations Department.</p>	


China Gold International Resources Corp. Ltd.		ISIN CA16890P1036
	<p>SDG ALIGNMENT</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels</p>	QUARTER Q4 2018
<p>THEMES</p> <p>Working conditions: Occupational health and safety; Stakeholder consultation: Forced displacement</p>		LOCATION China
<p>STATUS OF ENGAGEMENT</p> <p>Engagement has been suspended as the company has failed to respond (in spite of reminder and the escalation process).</p>		


China North Industries Group Corp. Ltd.		ISIN CND100004H17
	<p>SDG ALIGNMENT</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels</p>	QUARTER Q3 2018
<p>THEME</p> <p>Stakeholder consultation: Forced displacement</p>		LOCATION Myanmar
<p>STATUS OF ENGAGEMENT</p> <p>Engagement has been suspended as the company has failed to respond (in spite of reminder and the escalation process).</p>		

China Petroleum & Chemical Corp.		ISIN CNE1000002Q2
	<p>SDG ALIGNMENT</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms</p>	QUARTER Q2 2019
<p>THEME</p> <p>Bribery</p>		LOCATION China
<p>STATUS OF ENGAGEMENT</p> <p>As no response has been received following the escalation of the enquiry to the attention of the Board, the engagement will be re-evaluated.</p>		

China Yangtze Power Co., Ltd.		ISIN CNE000001G87
	SDG ALIGNMENT SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species	QUARTER Q4 2019
THEME Environmental Impacts: Deforestation		LOCATION China
STATUS OF ENGAGEMENT The company has yet to respond to outreach in Q4 2019. As such, it is subject to the reminder and escalation process and a reminder will be sent to its Investor Relations Department.		
Coca-Cola Amatil Ltd.		ISIN AU000000CCL2
	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 2019
THEME Working conditions: Union rights		LOCATION Indonesia
STATUS OF ENGAGEMENT The company has yet to respond to outreach in Q4 2019. As such, it is subject to the reminder and escalation process and a reminder will be sent to its Investor Relations Department.		
Contura Energy, Inc.		ISIN US21241B1008
	SDG ALIGNMENT SDG 13: Climate Action; 13.3: Improve education, awareness-raising and human and institutional capacity on climate change	QUARTER Q1 2019
THEME Climate change		LOCATION Philippines
STATUS OF ENGAGEMENT Engagement has been suspended as the company has failed to respond (in spite of being subject to the reminder and the escalation process).		
Deutsche Bank AG		ISIN DE0003933511
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.4: Reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organized crime	QUARTER Q2 2019


THEME Money laundering	LOCATION Russia; Virgin Islands
STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board, the engagement will be re-evaluated.	


DMCI Holdings, Inc.		ISIN PHY2088F1004
	<p>SDG ALIGNMENT</p> <p>SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services;</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels</p>	<p>QUARTER</p> <p>Q2 2018</p>
<p>THEME</p> <p>Stakeholder consultation: Living standards; Forced displacement; Pollution</p>		<p>LOCATION</p> <p>Philippines</p>
<p>STATUS OF ENGAGEMENT</p> <p>Engagement has been suspended as the company has failed to respond (in spite of reminder and the escalation process).</p>		


Ecopetrol SA		ISIN COC04PA00016
	<p>SDG ALIGNMENT</p> <p>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 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes</p>	<p>QUARTER</p> <p>Q3 2018</p>
<p>THEME</p> <p>Environmental impacts: Pollution; Working conditions: Union rights</p>		<p>LOCATION</p> <p>Colombia</p>
<p>STATUS OF ENGAGEMENT</p> <p>Engagement has been suspended as the company has failed to respond (in spite of reminder and the escalation process).</p>		

Empresas Públicas de Medellín ESP		ISIN COE25CB00195
	SDG ALIGNMENT SDG 1: No Poverty; 1.4: Equal rights to economic resources; SDG 16: Peace, justice and Strong Institutions; 16.10: Ensure public access to information and protect fundamental freedoms	QUARTER Q3 2018

THEME	LOCATION
Stakeholder consultation: Living standards; Forced displacement	Colombia
STATUS OF ENGAGEMENT	
Engagement has been suspended as the company has failed to respond (in spite of reminder and the escalation process).	

First Quantum Minerals Ltd.		ISIN CA3359341052
	<p>SDG ALIGNMENT</p> <p>SDG 15: Life on Land; 15.2: Sustainable management of all types of forests;</p> <p>SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species</p>	<p>QUARTER</p> <p>Q3 2019</p>
<p>THEME</p> <p>Environmental impacts: Depletion of biodiversity; Deforestation</p>		<p>LOCATION</p> <p>Panama</p>
<p>STATUS OF ENGAGEMENT</p> <p>As no response has been received following the escalation of the enquiry to the attention of the CEO, the enquiry will be sent to the Board.</p>		

Formosa Plastics Corp.		ISIN TW0001301000
	SDG ALIGNMENT SDG 6: Clean Water & Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials	QUARTER Q2 2019
THEME Environmental impacts: Climate change; Pollution; Deforestation	LOCATION Panama	
STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board, the engagement will be re-evaluated.		

Frasers Group Plc		ISIN GB00B1QH8P22
	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 2017
THEME Working conditions		LOCATION United Kingdom
STATUS OF ENGAGEMENT		

Engagement has been suspended as the company has failed to respond (in spite of reminder and the escalation process).

Hyundai Motor Co., Ltd.

ISIN
KR7005380001



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 2018

THEMES

Bribery; Working conditions: Union rights

LOCATION
South Korea

STATUS OF ENGAGEMENT

Engagement has been suspended as the company has failed to respond (in spite of reminder and the escalation process).

ICICI Bank Ltd.

ISIN
USY38575CZ07



SDG ALIGNMENT

SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms

QUARTER
Q4 2019

THEME

Bribery

LOCATION
India

STATUS OF ENGAGEMENT

The company has yet to respond to outreach in Q4 2019. As such, it is subject to the reminder and escalation process and a reminder will be sent to its Investor Relations Department.

Iflytek Co., Ltd.

ISIN
CNE100000B81



SDG ALIGNMENT

N/A

QUARTER
Q4 2019


THEME




Human Rights due diligence: Social discrimination; Privacy

LOCATION
China

STATUS OF ENGAGEMENT


The company has yet to respond to outreach in Q4 2019. As such, it is subject to the reminder and escalation process and a reminder will be sent to its Investor Relations Department.


Industrial & Commercial Bank of China Ltd.		ISIN CNE000001P37
	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 and sustainable use of terrestrial and inland freshwater ecosystems, in particular forests, wetlands, mountains and drylands; SDG 16: Peace, justice and Strong Institutions; 16.4: Reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organized crime; SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q3 2018
	THEMES Living Standards: Indigenous rights; Money laundering; Environmental impacts: Depletion of biodiversity	LOCATIONS China and Ethiopia and Spain
	STATUS OF ENGAGEMENT Engagement has been suspended as the company has failed to respond (in spite of reminder and the escalation process).	
INSYS Therapeutics, Inc.		ISIN US45824V1008
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q1 2018
THEME Bribery		LOCATION United States
STATUS OF ENGAGEMENT Engagement has been suspended as the company has failed to respond (in spite of reminder and the escalation process).		
Kinpo Electronics, Inc.		ISIN TW0002312006
	SDG ALIGNMENT 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; SDG 10: Reduced Inequalities; 10.7: Facilitate orderly, safe, regular and responsible migration	QUARTER Q4 2019
THEME		LOCATION

Working conditions: Forced labour		Thailand
<p>STATUS OF ENGAGEMENT</p> <p>The company has yet to respond to outreach in Q4 2019. As such, it is subject to the reminder and escalation process and a reminder will be sent to its Investor Relations Department.</p>		
Lu Thai Textile Co., Ltd.		ISIN CNE000000ST8
	<p>SDG ALIGNMENT</p> <p>SDG 8: Decent Work and Economic Growth; 8.b: Global strategy for youth employment</p>	QUARTER Q2 2019
THEME	Working conditions: Discrimination; Union rights	LOCATIONS Cambodia; Myanmar
<p>STATUS OF ENGAGEMENT</p> <p>As no response has been received following the escalation of the enquiry to the attention of the Board, the engagement will be re-evaluated.</p>		
Mega First Corp. Bhd.		ISIN MYL306900001
	<p>SDG ALIGNMENT</p> <p>SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species;</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels</p>	QUARTER Q4 2018
THEMES	Stakeholder consultation: Indigenous rights; Living standards; Environmental impacts: Depletion of biodiversity	LOCATION Laos
<p>STATUS OF ENGAGEMENT</p> <p>Engagement has been suspended as the company has failed to respond (in spite of reminder and the escalation process).</p>		
Motherson Sumi Systems Ltd.		ISIN CNE000001P37
	<p>SDG ALIGNMENT</p> <p>SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers</p>	QUARTER Q1 2018
THEME		LOCATION




Working conditions: Union rights		Mexico
<p>STATUS OF ENGAGEMENT</p> <p>Engagement has been suspended as the company has failed to respond (in spite of reminder and the escalation process).</p>		
Murray Energy Corp.		ISIN US62704PAA12
	<p>SDG ALIGNMENT</p> <p>SDG 13: Climate Action; 13.3: Improve education, awareness-raising and human and institutional capacity on climate change</p>	QUARTER Q1 2018
<p>THEME</p> <p>Climate Change</p>		LOCATION Philippines
<p>STATUS OF ENGAGEMENT</p> <p>Engagement has been suspended as the company has failed to respond (in spite of reminder and the escalation process).</p>		
NACCO Industries, Inc.		ISIN US6295791031
	<p>SDG ALIGNMENT</p> <p>SDG 13: Climate Action; 13.3: Improve education, awareness-raising and human and institutional capacity on climate change</p>	QUARTER Q1 2018
<p>THEME</p> <p>Climate Change</p>		LOCATION Philippines
<p>STATUS OF ENGAGEMENT</p> <p>Engagement has been suspended as the company has failed to respond (in spite of reminder and the escalation process).</p>		
Porsche Automobil Holding SE		ISIN DE000PAH0038
	<p>SDG ALIGNMENT</p> <p>SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes</p>	QUARTER Q3 2019
<p>THEME</p> <p>Environmental Impacts: Pollution</p>		LOCATION Germany; United States
<p>STATUS OF ENGAGEMENT</p> <p>As no response has been received following the escalation of the enquiry to the attention of the CEO, the enquiry will be sent to the Board.</p>		

Power Construction Corporation of China, Ltd.		ISIN CNE1000017G1
	SDG ALIGNMENT SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species	QUARTER Q4 2018
THEME Environmental Impacts: Deforestation; Depletion of biodiversity		LOCATION Indonesia
STATUS OF ENGAGEMENT Engagement has been suspended as the company has failed to respond (in spite of reminder and the escalation process).		

PT Sawit Sumbermas Sarana Tbk		ISIN ID1000130008
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage	QUARTER Q4 2019
THEME Environmental Impacts: Deforestation; Depletion of biodiversity		LOCATION Indonesia
STATUS OF ENGAGEMENT The company has yet to respond to outreach in Q4 2019. As such, it is subject to the reminder and escalation process and a reminder will be sent to its Investor Relations Department.		

PT Semen Indonesia (Persero) Tbk		ISIN ID1000106800
	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	QUARTER Q4 2019
THEME Stakeholder Consultation: Living standards		LOCATION Indonesia
STATUS OF ENGAGEMENT The company has yet to respond to outreach in Q4 2019. As such, it is subject to the reminder and escalation process and a reminder will be sent to its Investor Relations Department.		

PT Solusi Bangun Indonesia Tbk		ISIN ID1000072309
	SDG ALIGNMENT	QUARTER

<p>SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services;</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels</p>		Q4 2019
THEME	Stakeholder Consultation: Living standards	LOCATION Indonesia
<p>STATUS OF ENGAGEMENT</p> <p>The company has yet to respond to outreach in Q4 2019. As such, it is subject to the reminder and escalation process and a reminder will be sent to its Investor Relations Department.</p>		
Ratch Group Public Co. Ltd.		ISIN TH0637010008
	SDG ALIGNMENT	
	<p>SDG 1: No Poverty; 1.4: Equal rights to economic resources;</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.1: Reduce all forms of violence and related death rates everywhere</p>	QUARTER Q3 2018
THEME	Stakeholder Consultation: Living standards	LOCATION Cambodia
<p>STATUS OF ENGAGEMENT</p> <p>The company has yet to respond to outreach in Q4 2019. As such, it is subject to the reminder and escalation process and a reminder will be sent to its Investor Relations Department.</p>		
Red Rock Resorts, Inc.		ISIN US75700L1089
	SDG ALIGNMENT	
	<p>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 2019
THEME	Working conditions: Union Rights	LOCATION United States
<p>STATUS OF ENGAGEMENT</p> <p>As no response has been received following the escalation of the enquiry to the attention of the CEO, the enquiry will be sent to the Board.</p>		
ROSSETI PJSC		ISIN RU000A0JPVJ0
	SDG ALIGNMENT	
	<p>SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms</p>	QUARTER Q2 2019

<p>THEME Bribery</p>	<p>LOCATION Russia</p>
<p>STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board, the engagement will be re-evaluated.</p>	
<p>Semirara Mining & Power Corp.</p>	
<p>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</p>	<p>ISIN PHY7627Y1065</p> <p>QUARTER Q2 2018</p>
<p>THEME Stakeholder Consultation: Living standards; Forced displacement; Pollution</p>	<p>LOCATION Philippines</p>
<p>STATUS OF ENGAGEMENT The company has yet to respond to outreach in Q4 2019. As such, it is subject to the reminder and escalation process and a reminder will be sent to its Investor Relations Department.</p>	
<p>Sibanye Gold Ltd.</p>	
<p>SDG ALIGNMENT SDG 1: No Poverty; 1.4: Equal rights to economic resources; SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels</p>	<p>ISIN US8257242060</p> <p>QUARTER Q4 2019</p>
<p>THEME Stakeholder Consultation: Living standards; Health; Water</p>	<p>LOCATION South Africa</p>
<p>STATUS OF ENGAGEMENT The company has yet to respond to outreach in Q4 2019. As such, it is subject to the reminder and escalation process and a reminder will be sent to its Investor Relations Department.</p>	
<p>SNAM SpA</p>	
<p>SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels</p>	<p>ISIN IT0003153415</p> <p>QUARTER Q1 2019</p>
<p>THEME Stakeholder Consultation: Living standards; Pollution</p>	<p>LOCATION Italy</p>

STATUS OF ENGAGEMENT

Engagement has been suspended as the company has failed to respond (in spite of being subject to the reminder and the escalation process).

SNC-Lavalin Group, Inc.

ISIN
CA78460T1057



SDG ALIGNMENT

SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms;

SDG 17: Partnerships for the Goals; 17.1: Strengthen domestic resource mobilization

QUARTER
Q4 2018

THEMES

Taxation and Bribery

LOCATIONS
Senegal and
Algeria;
Bangladesh;
Cambodia;
Canada; Libya

STATUS OF ENGAGEMENT

Engagement has been suspended as the company has failed to respond (in spite of being subject to the reminder and the escalation process).

Station Casinos LLC

ISIN
US857691AB53



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
Q3 2019

THEME

Working conditions: Union Rights

LOCATION
United States

STATUS OF ENGAGEMENT

As no response has been received following the escalation of the enquiry to the attention of the CEO, the enquiry will be sent to the Board.

Sumitomo Corp.

ISIN
JP3404600003



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 2019

THEME

Working Conditions: Union rights; Living wage

LOCATION
Honduras

STATUS OF ENGAGEMENT

The company has yet to respond to outreach in Q4 2019. As such, it is subject to the reminder and escalation process and a reminder will be sent to its Investor Relations Department.

TH Plantations Bhd.

ISIN
MYL511200007



SDG ALIGNMENT

SDG 13: Climate Action; 13.3: Improve education, awareness-raising and human and institutional capacity on climate change;

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
Q4 2019

THEME

Environmental Impacts: Climate change; Deforestation; Depletion of biodiversity

LOCATION
Indonesia

STATUS OF ENGAGEMENT

The company has yet to respond to outreach in Q4 2019. As such, it is subject to the reminder and escalation process and a reminder will be sent to its Investor Relations Department.

The Blackstone Group, Inc.

ISIN
US09253U1088



SDG ALIGNMENT

SDG 17: Partnerships for the Goals; 17.1: Strengthen domestic resource mobilization

QUARTER
Q3 2018

THEME

Taxation

LOCATION
United Kingdom

STATUS OF ENGAGEMENT

Engagement has been suspended as the company has failed to respond (in spite of being subject to the reminder and the escalation process).

Tongling Nonferrous Metals Group Co., Ltd.

ISIN
CNE000000529



SDG ALIGNMENT


SDG 6: Clean Water & Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials;


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 2019

THEMES Environmental Impacts: Pollution and Stakeholder Consultation: Indigenous rights	LOCATIONS China and Peru
STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board, the engagement will be re-evaluated.	

ViacomCBS, Inc.	ISIN US124857AD56
 SDG ALIGNMENT 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	QUARTER Q3 2019
THEME Workplace Discrimination	LOCATION United States
STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the CEO, the enquiry will be sent to the Board.	

Volcan Compania Minera S.A.A.	ISIN PEP648014202
 SDG ALIGNMENT SDG 6: Clean Water & Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials	QUARTER Q3 2018
THEME Environmental Impacts: Waste Management	LOCATION Peru
STATUS OF ENGAGEMENT Engagement has been suspended as the company has failed to respond (in spite of being subject to the reminder and the escalation process).	

Westmoreland Coal Co.	ISIN US960887AB34
 SDG ALIGNMENT SDG 13: Climate Action; 13.3: Improve education, awareness-raising and human and institutional capacity on climate change	QUARTER Q1 2019
THEME Climate Change	LOCATION Philippines
STATUS OF ENGAGEMENT	

Engagement has been suspended as the company has failed to respond (in spite of being subject to the reminder and the escalation process).

WTK Holdings Bhd.

ISIN
MYL424300001



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; 15.2: Sustainable management of all types of forests;

SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species

SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels

QUARTER
Q3 2018

THEMES

Environmental impacts: Deforestation; Depletion of biodiversity; Stakeholder consultation: Indigenous rights

LOCATIONS

Malaysia and
Papua New Guinea

STATUS OF ENGAGEMENT

Engagement has been suspended as the company has failed to respond (in spite of being subject to the reminder and the escalation process).

Wynn Resorts Ltd.

ISIN
US9831341071



SDG ALIGNMENT

SDG 5: Gender Equality; 5.1: End all forms of discrimination 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 2018

THEME

Workplace discrimination

LOCATION

United States

STATUS OF ENGAGEMENT

Engagement has been suspended as the company has failed to respond (in spite of being subject to the reminder and the escalation process).

Xiamen Meiya Pico Information Co., Ltd.

ISIN
CNE100001120





SDG ALIGNMENT


SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels

QUARTER
Q4 2019


THEME Human rights due Diligence: Social discrimination; Privacy	LOCATION China
STATUS OF ENGAGEMENT The company has yet to respond to outreach in Q4 2019. As such, it is subject to the reminder and escalation process and a reminder will be sent to its Investor Relations Department.	

XPO Logistics, Inc.	ISIN US12612WAB00
 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 2018
THEME Working conditions	LOCATION United States
STATUS OF ENGAGEMENT Engagement has been suspended as the company has failed to respond (in spite of being subject to the reminder and the escalation process).	

Zhejiang Dahua Technology Co. Ltd.	ISIN CNE100000BJ4
 SDG ALIGNMENT N/A	QUARTER Q4 2019
THEME Human rights due Diligence: Social discrimination; Privacy	LOCATION China
STATUS OF ENGAGEMENT The company has yet to respond to outreach in Q4 2019. As such, it is subject to the reminder and escalation process and a reminder will be sent to its Investor Relations Department.	

Zhejiang Huayou Cobalt Co., Ltd.	ISIN CNE100001VW3
 SDG ALIGNMENT 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; SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	QUARTER Q3 2018
THEME Working conditions: Occupational health and safety	LOCATION China
STATUS OF ENGAGEMENT	


As no response has been received following the escalation of the enquiry to the attention of the CEO, the enquiry will be sent to the Board.

Zijin Mining Group Co., Ltd.		ISIN CNE100000502
	SDG ALIGNMENT SDG 6: Clean Water & Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials;	QUARTER Q2 2019
	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	
THEMES Environmental impacts: Pollution; Human rights due diligence: Forced displacement; Stakeholder consultation: Indigenous rights		LOCATIONS China, Papua New Guinea and Peru
STATUS OF ENGAGEMENT As no response has been received following the escalation of the enquiry to the attention of the Board, the engagement will be re-evaluated.		

COMPLETED ENGAGEMENT DIALOGUES IN 2019


Engagements with the following companies on select topics were completed during 2019, either based on the company's response or developments related to the controversy.


Table 4: Company updates for prior year/quarter engagement initiations

Adani Enterprises Ltd.		ISIN INE423A01024
	SDG ALIGNMENT SDG 6: Clean Water & Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials;	QUARTER Q4 2016
	SDG 14: Life Below Water; 14.2: Sustainably manage and protect marine and coastal ecosystems	
THEME Environmental impacts: Deforestation; Depletion of biodiversity		LOCATION India
MOTIVATION FOR CLOSING ENGAGEMENT While Adani Enterprises Ltd. and Adani Ports & Special Economic Zone Ltd. (APSEZ) have consistently failed to respond to ISS ESG's attempts to establish a dialogue, no substantiated allegations of environmental		


impacts have been raised against the Mundra Port in Gujarat, India for several years and ISS ESG assesses the allegations to be outdated.


Adani Ports & Special Economic Zone Ltd.		ISIN INE742F01042
	SDG ALIGNMENT SDG 6: Clean Water & Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials; SDG 14: Life Below Water; 14.2: Sustainably manage and protect marine and coastal ecosystems	QUARTER Q1 2017
THEME Environmental impacts: Deforestation; Depletion of biodiversity		LOCATION India
MOTIVATION FOR CLOSING ENGAGEMENT While Adani Enterprises Ltd. and Adani Ports & Special Economic Zone Ltd. (APSEZ) have consistently failed to respond to ISS ESG's attempts to establish a dialogue, no substantiated allegations of environmental impacts have been raised against the Mundra Port in Gujarat, India for several years and ISS ESG assesses the allegations to be outdated.		

Africa-Israel Investments Ltd		ISIN IL0006110121
	SDG ALIGNMENT SDG 17: Global partnership for sustainable development; 17.15: Respect each country's leadership to implement policies for poverty eradication and sustainable development	QUARTER Q2 2012
THEME Human rights: Right to self-determination		LOCATION Disputed territories
MOTIVATION FOR CLOSING ENGAGEMENT Africa Israel Investments Ltd.'s (AFI) construction arm, and as of July 2015 wholly owned subsidiary, was involved in the construction of Israeli settlements in occupied Palestine until 2014. There have been no renewed reports of the company's involvement in settlement activity since 2014.		

Akbank TAS		ISIN TRAAKBNK91N6
	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;	QUARTER Q2 2015

	<p>SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species</p> <p>SDG 15: Life on Land; 15.1: Ensure the conservation and sustainable use of terrestrial and inland freshwater ecosystems, in particular forests, wetlands, mountains and drylands</p>	
THEME	Environmental impacts; Forced displacement	LOCATION Turkey
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>Since the construction of the project is completed, ISS ESG assesses Akbank's leverage, as a financier, to be limited and further engagement attempts with the company are considered unnecessary.</p>		

Akorn, Inc.		ISIN US0097281069
	SDG ALIGNMENT N/A	QUARTER Q3 2015
THEME	Capital punishment	LOCATION United States
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>In spite of the company's reluctance to discuss its distribution controls, no further allegations about the company's complicity in capital punishment have been raised. Based on this information, ISS ESG assesses that the company is not involved in an ongoing severe, systematic or systemic failure to respect international norms.</p>		

Alstom SA		ISIN FR0010220475
	<p>SDG ALIGNMENT</p> <p>SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services;</p> <p>SDG 6: Clean Water & Sanitation; 6.b: Participation of local communities in improving water and sanitation management;</p> <p>SDG 11: Sustainable Cities and Communities; 11.1: Access for all to adequate, safe and affordable housing;</p> <p>SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage;</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms</p>	QUARTER Q3 2016
THEMES	Living standards: Stakeholder consultation; Bribery	LOCATIONS Brazil; Colombia; Latvia; Malaysia; Tunisia; Zambia

MOTIVATION FOR CLOSING ENGAGEMENT

In October 2018 Alstom SA announced the sale of all its interests in its three Renewables Joint Ventures to General Electric Co., ending its involvement in the supply of electromechanical equipment to the Belo Monte project in Brazil and the Hidroituango project in Colombia.

With regards to its involvement in business malpractice controversies, ISS ESG assesses Alstom's remediation efforts to be credible and robust. Due to the satisfactory implementation and extended time frame since the incidents occurred, the engagement objectives have been met.

America Movil SAB de CV

ISIN
MXP001691213



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
Q3 2018

THEME

Working conditions: Union rights

LOCATION
El Salvador

MOTIVATION FOR CLOSING ENGAGEMENT

America Movil SAB de CV's subsidiary Compañía de Telecomunicaciones de El Salvador, S.A. de C.V. was alleged to have engaged in anti-union conduct in El Salvador in 2011 according to local trade unions. No renewed information has emerged on the alleged union rights violation, and ISS ESG assesses that the controversy is no longer current.

Andritz AG

ISIN
AT0000730007



SDG ALIGNMENT

SDG 2: Zero Hunger; 2.1: End hunger and ensure access by all people to safe, nutritious and sufficient food;
SDG 11: Sustainable Cities and Communities; 11.1: Access for all to adequate, safe and affordable housing;
SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage

QUARTER
Q3 2015


THEME


Environmental impacts: Depletion of biodiversity; Indigenous rights: Living standards; Forced displacement


LOCATIONS
Laos; Brazil

MOTIVATION FOR CLOSING ENGAGEMENT


In repeated exchanges with ISS ESG, Andritz stated that the company has strict internal policies for participation in projects and that, while in its role as a supplier the company does not have influence on the social and ecological framework of projects, it supports its customers in creating the best possible conditions for reducing social and ecological impacts. ISS ESG assesses Andritz to no longer be involved in the controversies.


Anglo American Platinum Ltd.		ISIN ZAE000143962
	SDG ALIGNMENT SDG 6: Clean Water & Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials	QUARTER Q4 2014
THEME Water pollution		LOCATION South Africa
MOTIVATION FOR CLOSING ENGAGEMENT Anglo American Platinum Ltd. maintains that it has addressed the issue and that it continuously monitors water sources in its area of operations. The company has been responsive to ISS ESG's dialogue, and no new complaints on water quality have been raised since 2014.		


Antofagasta Plc		ISIN GB0000456144
	SDG ALIGNMENT SDG 6: Clean Water & Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials	QUARTER Q2 2017
THEME Poor waste management; Pollution		LOCATION Argentina
MOTIVATION FOR CLOSING ENGAGEMENT In December 2017 the company was ordered to remove its mining waste from its mine in Chile, which contaminated the waters across the border in Argentina. The order was to move the waste over a period of five and a half years to a dump site inside Chile. In communication with ISS ESG in April 2018, Antofagasta disclosed that waste removal began in January 2018, and in November 2018 its subsidiary stated that waste removal would be completed ahead of schedule.		

Arcadis NV		ISIN NL0006237562
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.1: Access for all to adequate, safe and affordable housing; SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage	QUARTER Q3 2016
THEME Indigenous rights: Living standards; Forced displacement		LOCATION Brazil
MOTIVATION FOR CLOSING ENGAGEMENT		


In January 2019, Arcadis informed ISS ESG that it was no longer providing Owner's Engineering Services to the Belo Monte project. The company added that since it had no direct involvement in the projects around indigenous people and traditional communities, it was not within its possibilities to make contributions in that part of the project.


ArcelorMittal South Africa Ltd.		ISIN ZAE000134961
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q1 2016
THEME Poor waste management; Pollution		LOCATION South Africa
MOTIVATION FOR CLOSING ENGAGEMENT An inspection of the site conducted by the Gauteng Department of Agriculture and Rural Development in 2010 confirmed that ArcelorMittal South Africa had stopped all activities at the site and removed 99% of the magnetite. In 2016 the Department of Environmental Affairs communicated that it would not prosecute the facility for the waste related controversy.		




Ayala Corp.		ISIN PHY0486V1154
	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 Q1 2016
THEME Indigenous rights: Stakeholder consultation		LOCATION Philippines
MOTIVATION FOR CLOSING ENGAGEMENT As no new allegations have been raised against the Alviera project, ISS ESG assesses that the company is no longer involved in poor stakeholder consultation and failure to respect indigenous rights in the Philippines.		

Ayala Land, Inc.		ISIN PHY0488F1004
	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 Q1 2016


THEME Indigenous rights: Stakeholder consultation	LOCATION Philippines
MOTIVATION FOR CLOSING ENGAGEMENT As no new allegations have been raised against the Alviera project, ISS ESG assesses that the company is no longer involved in poor stakeholder consultation and failure to respect indigenous rights in the Philippines.	


Banco BTG Pactual SA		ISIN BRBPACACNOR7
	<p>SDG ALIGNMENT</p> <p>SDG 11: Sustainable Cities and Communities; 11.1: Access for all to adequate, safe and affordable housing;</p> <p>SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world’s cultural and natural heritage</p>	QUARTER Q2 2014
THEME Indigenous rights: Living standards		LOCATION Brazil
MOTIVATION FOR CLOSING ENGAGEMENT The dam became fully operational in November 2019. As a result, ISS ESG assesses that BTG Pactual is no longer involved in the controversy.		


Bangkok Bank Public Co. Ltd.		ISIN TH0001010006
	<p>SDG ALIGNMENT</p> <p>SDG 2: Zero Hunger; 2.1: End hunger and ensure access by all people to safe, nutritious and sufficient food;</p> <p>SDG 15: Life on Land; 15.1: Ensure the conservation and sustainable use of terrestrial and inland freshwater ecosystems, in particular forests, wetlands, mountains and drylands</p>	<p>QUARTER</p> <p>Q4 2019</p>
<p>THEMES</p> <p>Environmental impacts; Stakeholder consultation: Living standards</p>		<p>LOCATION</p> <p>Laos</p>
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>Bangkok Bank Public Co. Ltd. financed the construction of the Xayaburi hydropower project on the Mekong River in Laos, a project accused of failing to assess environmental impacts and prevent the depletion of the river's biodiversity. The dam became fully operational in October 2019. As a result, ISS ESG assesses that Bangkok Bank is no longer involved in the controversy.</p>		

Barrick Gold Corp.		ISIN CA0679011084
	<p>SDG ALIGNMENT</p> <p>SDG 6: Clean Water & Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials</p> <p>SDG 15: Life on Land; 15.1: Ensure the conservation and sustainable use of terrestrial and inland freshwater ecosystems, in particular forests, wetlands, mountains and drylands</p>	QUARTER Q3 2016
THEME Pollution		LOCATION Tanzania
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>Acacia Mining Plc, Barrick Gold Corp.'s subsidiary, has reportedly taken measures to address the issues, stating that "[a]ll seepage is and will be contained on the site, does not flow into the surrounding environment or present a risk of contamination to any public water source".</p>		
Bayer AG		ISIN XS0225369403
	<p>SDG ALIGNMENT</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms</p>	QUARTER Q1 2019
THEMES Bribery		LOCATION United States
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>In September 2018 Bayer AG, among other pharmaceutical companies, faced whistle-blower allegations in the United States (U.S.) claiming the company's free services offered to prescribers constitute kickback payments. Bayer informed its investors in March 2019 that the U.S. Department of Justice (DoJ) has sought to dismiss the legal proceedings against it. According to Bayer, the DoJ concluded in its statement that the allegations lack factual and legal support. As a result, further engagement with the company is deemed unnecessary.</p>		
Beijing TongRenTang Co., Ltd.		ISIN CNE000000R69
	<p>SDG ALIGNMENT</p> <p>SDG 3: Good Health and Wellbeing; 3.9: Reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination</p>	QUARTER Q1 2016
THEME Consumer rights: Impacts from hazardous substances		LOCATION China
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p>		

ISS ESG assesses that the company has effectively remediated its risk exposure to adverse impacts of its products on the health of its consumers.

Bilfinger SE		ISIN DE0005909006
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q1 2018
THEMES Bribery		LOCATION Nigeria
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>Bilfinger SE is taking credible measures to improve its anticorruption policies following the Deferred Prosecution Agreement (DPA) with United States (U.S.) authorities, first signed in 2013, to resolve bribery allegations in Nigeria. Based on the recent conclusion of the DPA, which entails the satisfactory implementation of an anticorruption program, ISS ESG deems that engagement with the company is no longer necessary.</p>		

British American Tobacco Plc		ISIN GB0002875804
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q4 2017
THEME Bribery		LOCATIONS Burundi; Comores; Kenya; Rwanda; South Africa; Uganda
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>Given the extended period since the alleged misconduct, and the measures British American Tobacco has implemented since 2012, ISS ESG assesses that the company is no longer involved in the controversy.</p>		

China Gold International Resources Corp. Ltd.		ISIN CA16890P1036
	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 Q3 2014
THEMES Working conditions: Occupational health and safety		LOCATION China

MOTIVATION FOR CLOSING ENGAGEMENT

China Gold International Resources Corp. Ltd.'s (China Gold) wholly-owned subsidiary Tibet Huatailong Mining Development Co. Ltd was allegedly the site of an industrial accident that claimed the lives of 83 workers in 2013 in the Gyama Valley, Tibet. The deaths were reportedly caused by a landslide. Since then, however, no new serious accidents have been reported, and ISS ESG assesses that the controversy is no longer current.

China Railway Construction Corp. Ltd.

ISIN
CNE100000981



SDG ALIGNMENT

SDG 1: No Poverty; 1.4: Equal rights to economic resources;
SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms

QUARTER
Q1 2017

THEMES

Bribery; Health

LOCATION
China

MOTIVATION FOR CLOSING ENGAGEMENT

China Railway Construction Corp. Ltd. has adopted credible measures to strengthen its anticorruption program following a bribery scandal that rocked the Chinese railway industry.

In addition, since 2014 no new incidents of violation of right to life, security, property rights and involvement in riot control in China have been reported.

CNOOC Ltd.

ISIN
HK0883013259



SDG ALIGNMENT

SDG 1: No Poverty; 1.4: Equal rights to economic resources, and access to basic services;
SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes

QUARTER
Q2 2016

THEME


Environmental impacts: Water pollution; Forced displacement


LOCATION
China; Myanmar


MOTIVATION FOR CLOSING ENGAGEMENT

CNOOC Ltd. was criticised for alleged complicity in forced displacement of local communities to make way for onshore Block M in the state of Rakhine, Myanmar, where it formerly operated. CNOOC has since confirmed that it relinquished the exploration blocks and no longer had any operation in Myanmar.


Separately, CNOOC faced criticism for two oil leaks that occurred at its Peng Lai 19-3 offshore oilfield in Bohai Bay, China, in June 2011. Since then, however, no new serious leaks have been reported, and ISS ESG assesses that the controversy is no longer current.


Deutsche Post AG		ISIN DE0005552004
	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 Q3 2018
THEMES Working conditions: Union rights		LOCATION Colombia; India; Turkey
MOTIVATION FOR CLOSING ENGAGEMENT Deutsche Post AG is assessed to be taking adequate steps to address allegations that it engaged in anti-union discrimination at its operations.		

Dexia SA		ISIN BE0003796134
	SDG ALIGNMENT SDG 17: Global partnership for sustainable development; 17.15: Respect each country's leadership to implement policies for poverty eradication and sustainable development	QUARTER Q2 2014
THEMES Human rights: Right to self-determination		LOCATION Disputed territories
MOTIVATION FOR CLOSING ENGAGEMENT On 18 March 2018 Dexia Crédit Local SA, the operational entity of the 99.59% state-owned Dexia SA, agreed to sell all its shares in Dexia Israel Bank Ltd. The announced sale effectively ends Dexia's involvement in the controversy.		




Electricité de France SA		ISIN FR0010800540
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q4 2015
THEMES Living standards		LOCATION Laos
MOTIVATION FOR CLOSING ENGAGEMENT In July 2018, the Independent Panel of Experts assessing the implementation of the Resettlement Implementation Period (RIP) for the communities affected by the Nam Theun 2 dam praised the progress made, stating that "the project is on the road to overall sustainability", and recommended that "the Government agree that the RIP be closed immediately". On the basis of this acknowledgement by a third-party stakeholder, ISS ESG assessed that Electricité de France SA was implementing credible steps in resolving the controversy.		

E-Mart, Inc.		ISIN KR7139480008
	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 2014
THEMES Working conditions: Union rights		LOCATION South Korea
MOTIVATION FOR CLOSING ENGAGEMENT In communication with ISS ESG in February 2019, the company stated that it respects workers' union rights, and shared that there are currently three active unions – affiliates of either Federation of Korean Trade Unions (FKTU) or Korean Confederation of Trade Unions (KCTU) – with which it reached a joint agreement on “a new labor and management culture” in August 2017.		

Embraer SA		ISIN BREMBRACNOR4
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q3 2016
THEMES Bribery		LOCATION Argentina
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG assesses the company's enhancements to its anticorruption program to be credible. Furthermore, allegations of bribery payments to officials in Argentina between 2008 and 2009, in exchange for commercial and defence aircraft sales worth about \$900 million, was dismissed by authorities during the course of their investigation.		

ENGIE SA		ISIN FR0010709279
	SDG ALIGNMENT SDG 2: Zero Hunger; 2.1: End hunger and ensure access by all people to safe, nutritious and sufficient food; SDG 15: Life on Land; 15.1: Ensure the conservation and sustainable use of terrestrial and inland freshwater ecosystems, in particular forests, wetlands, mountains and drylands	QUARTER Q1 2017
THEMES Environmental impacts; Stakeholder consultation: Living standards		LOCATION Laos
MOTIVATION FOR CLOSING ENGAGEMENT ENGIE SA was, through its subsidiary Compagnie Nationale du Rhône (CNR), involved as an advisor for the construction of the Xayaburi hydropower project on the Mekong River in Laos, a project accused of failing		

to assess environmental impacts and prevent the depletion of the river's biodiversity. The project entered into operation in October 2019, and ISS ESG assesses that ENGIE is no longer involved in the controversy.

Eni SpA		ISIN IT0003132476
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q4 2016
THEMES Bribery		LOCATION Kazakhstan
MOTIVATION FOR CLOSING ENGAGEMENT Eni SpA was facing criminal proceedings before the Italian public prosecutor of Milan in relation to alleged bribery in relation to its Kazakh operations, where it has been present since 1992 with stakes in oil and gas fields. In January and March 2017, the proceedings against Eni and its officers were dismissed.		
Entergy Corp.		ISIN US29364GAF00
	SDG ALIGNMENT SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning	QUARTER Q1 2019
THEMES Climate change		LOCATION United States
MOTIVATION FOR CLOSING ENGAGEMENT Entergy Corp. was part of legal proceedings, filed in 2015, against the United States (U.S.) Environmental Protection Agency (EPA) to postpone policies tackling climate change. The company and its co-petitioners challenged the Clean Power Plan (CPP), a set of rules issued by the EPA aimed at mitigating climate change by reducing carbon emissions from power plants. However, in June 2019 the EPA issued the Affordable Clean Energy rule (ACE), replacing the CPP and in September 2019, a U.S. Court of Appeals dismissed all legal challenges related to the CPP, finalizing the ACE in its place. As the CPP has been conclusively replaced by the ACE and all rights to appeal have been exhausted, ISS ESG considers the company to no longer be involved in the controversy.		
Eutelsat Communications SA		ISIN FR0010221234
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.10: Ensure public access to information and protect fundamental freedoms	QUARTER Q1 2012
THEMES Freedom of expression		LOCATIONS Algeria; Tunisia

MOTIVATION FOR CLOSING ENGAGEMENT

Since 2010, neither Radio Kalima nor the NGO Reporters without Borders – a press-freedom oriented NGO which has been critical of Eutelsat in the past – have provided any new evidence supporting their claims of complying with directives of the Tunisian and Algerian governments to stop the broadcast of radio stations that challenged the state monopoly of the media. Tunisia became a democracy in 2014.

Evergy, Inc.

ISIN
US30034W1062



SDG ALIGNMENT

SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning

QUARTER
Q1 2019

THEMES

Climate change

LOCATION

United States

MOTIVATION FOR CLOSING ENGAGEMENT

In June 2018, Evergy Kansas Central, Inc. (formerly Westar Energy, Inc.) and Great Plains Energy, Inc., completed their merger, creating Evergy, Inc. Evergy Kansas was part of legal proceedings, filed in 2015, against the United States (U.S.) Environmental Protection Agency (EPA) to postpone policies tackling climate change. The company and its co-petitioners challenged the Clean Power Plan (CPP), a set of rules issued by the EPA aimed at mitigating climate change by reducing carbon emissions from power plants. However, in June 2019 the EPA issued the Affordable Clean Energy rule (ACE), replacing the CPP, and in September 2019 a U.S. Court of Appeals dismissed all legal challenges related to the CPP, finalizing the ACE in its place. Evergy Kansas, which discloses little on its carbon footprint, stated that it will support public policies that accelerate the development of low emissions technologies and initiatives made to mitigate greenhouse gases emissions, and issued a green bond in 2016. In investor dialogue facilitated by ISS ESG in 2017, Evergy Kansas stated that it is flexible and resilient to future climate change mitigation policies. As the CPP has been conclusively replaced by the ACE and all rights to appeal have been exhausted, ISS ESG considers the company to no longer be involved in the controversy.

Formosa Plastics Corp.

ISIN
TW0001301000



SDG ALIGNMENT

SDG 6: Clean Water & Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials

QUARTER
Q1 2017

THEMES


Environmental impacts: Water pollution


LOCATION


Vietnam

MOTIVATION FOR CLOSING ENGAGEMENT


After Formosa Ha Tinh Steel Corporation, an operation controlled by Formosa Plastics Corp., admitted responsibility for the death of fish and marine life in 2016 in Ha Tinh province, Vietnam, it took steps to improve its waste management. In May 2019 the Vietnamese Department of Environment confirmed that waste management at the plant met environmental requirements. No new serious leaks have been reported since 2016, and ISS ESG assesses that the controversy is no longer current.


Fortis, Inc.		ISIN CA3495531079
	SDG ALIGNMENT SDG 6: Clean Water & Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials	QUARTER Q4 2016
THEMES Environmental impacts: Water pollution		LOCATION Belize
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>In December 2018, the Belizean Ministry of Health reported that sample analysis revealed that for the first time “all fish [downstream the Chalillo dam] had levels of mercury under the recommended safety level”. In light of the ongoing remediation of the water pollution, ISS ESG remains vigilant on developments, but deems that further engagement attempts with the company are unnecessary.</p>		

Frontera Energy Corp.		ISIN CA69480U2065
	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 2015
THEMES Working conditions: Union rights		LOCATION Colombia
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>ISS ESG assesses that Frontera Energy Corp. is no longer involved in an ongoing failure to respect union rights in Colombia, as no renewed claims of anti-union practices have been raised since 2016.</p>		

GlaxoSmithKline Plc		ISIN GB0009252882
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q1 2015
THEMES Bribery		LOCATIONS INITIATED Iraq; Jordan; Lebanon; Poland; Syria
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>In February 2019 the United Kingdom Serious Fraud Office announced that it closed the investigation into GlaxoSmithKline Plc’s alleged involvement in bribing physicians in Jordan, Syria, Lebanon, Poland, Iraq, Romania, and the United Arab Emirates to increase the prescriptions of its drugs between 2010 and 2012.</p>		


In light of the Serious Fraud Office's decision to close the investigation, ISS ESG assesses that GlaxoSmithKline is no longer involved in the controversy.


Glencore Plc		ISIN JE00B4T3BW64
	<p>SDG ALIGNMENT</p> <p>SDG 6: Clean Water & Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials;</p> <p>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 16: Peace, justice and Strong Institutions; 16.1: Reduce all forms of violence and related death rates everywhere;</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels;</p> <p>SDG 17: Partnerships for the Goals; 17.1: Strengthen domestic resource mobilization;</p> <p>SDG 17: Global partnership for sustainable development; 17.15: Respect each country's leadership to implement policies for poverty eradication and sustainable development</p>	<p>QUARTER Q3 2018</p>
<p>THEMES</p> <p>Working conditions; Taxation; Environmental impacts: Pollution; Indigenous rights; Living standards: Forced displacement; Human rights: Right to self-determination</p>		<p>LOCATIONS</p> <p>Democratic Republic of Congo; Disputed Territories; Peru; Philippines; Switzerland; United Kingdom; Zambia</p>
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>Glencore Plc has demonstrated its openness to engage with investors and has provided information on the environment, labour rights and human rights impacts of its operations. Engagement has been closed on the basis of the information disclosed on measures taken to address the controversies.</p>		


Goldcorp, Inc.		ISIN CA3809564097
	<p>SDG ALIGNMENT</p> <p>SDG 6: Clean Water & Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials;</p> <p>SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes</p>	<p>QUARTER Q2 2015</p>

THEMES Waste management: Pollution	LOCATIONS Guatemala; Honduras
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>Goldcorp, Inc is assessed to have adopted credible measures to address the pollution generated by its Marlin gold mine in Guatemala and its San Martin mine in Honduras. Further engagement attempts with the company on the issues identified are assessed to not be necessary.</p>	

HAGL JSC	ISIN US4337181030
 <p>SDG ALIGNMENT</p> <p>SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage;</p> <p>SDG 15: Life on Land; 15.2: Sustainable management of all types of forests;</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels</p>	QUARTER Q1 2015
THEMES Environmental impacts: Depletion of biodiversity; Deforestation; Indigenous rights: Living standards	LOCATIONS Cambodia
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>HAGL JSC is assessed to be taking credible steps to address allegations by the NGOs Global Witness, Equitable Cambodia and Inclusive Development International that several of its subsidiaries are failing to respect environmental standards and indigenous rights in connection with their rubber concessions in Cambodia.</p>	

Hindustan Construction Co. Ltd.	ISIN INE549A01026
 <p>SDG ALIGNMENT</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels</p>	QUARTER Q1 2016
THEMES Indigenous rights	LOCATIONS India
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>While Hindustan Construction Co. Ltd. has remained unresponsive to ISS ESG's attempts to establish a dialogue, no new allegations have emerged since 2015. As a result, ISS ESG assesses that the controversy is no longer current.</p>	


Hyundai Mipo Dockyard Co., Ltd.		ISIN KR7010620003
	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 Q3 2016
THEMES Working conditions: Occupational health and safety		LOCATIONS Algeria and Tunisia
MOTIVATION FOR CLOSING ENGAGEMENT Hyundai Heavy Industries Co., Ltd. is assessed to be adopting credible measures to address previous findings by the Korean Ministry of Employment and Labor that it was failing to uphold effective health and safety standards in its shipyard, which it operates together with its subsidiary Hyundai Mipo Dockyards Co., Ltd. in Ulsan.		


Hyundai Motor Co., Ltd.		ISIN KR7005380001
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q4 2018
THEMES Bribery		LOCATION South Korea
MOTIVATION FOR CLOSING ENGAGEMENT Hyundai Motor Co., Ltd., among other companies, was linked in 2016 to a bribery controversy involving the former South Korean president Park Geun-hye and her confidante. While Hyundai Motor admitted to having made donations to foundations favoured by the president, the company denied deriving any benefits. As of February 2020, it remains unclear whether Hyundai Motor continues to be a subject of investigation over the allegations, and no new reports have emerged to shed light on the issue. As a result, ISS ESG assesses that the controversy is no longer current.		

Industrial & Commercial Bank of China Ltd.		ISIN CNE000001P37
	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; 16.4: Reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organized crime	QUARTER Q3 2018
THEMES Environmental impacts; Indigenous rights; Money laundering		LOCATION Laos
MOTIVATION FOR CLOSING ENGAGEMENT		


Industrial & Commercial Bank of China Ltd. (ICBC) financed the construction of the Gibe III Hydroelectric Project on the Omo River in Ethiopia, a project accused of affecting the livelihood of indigenous groups, as well as contributing to the depletion of the river's biodiversity. The dam became fully operational in October 2019, diminishing ICBC's leverage. As a result, ISS ESG assesses that ICBC is no longer involved in the controversy.


Separately, ICBC was under investigation by Spanish National High Court concerning allegations of having failed to prevent money laundering in its operations in Spain, enabling the laundering of €225 million stemming from illicit proceeds between 2011 and 2014. No new serious instances of money laundering have been reported since, and ISS ESG assesses that the controversy is no longer current.


Innophos Holdings, Inc.		ISIN US45774N1081
	SDG ALIGNMENT SDG 17: Global partnership for sustainable development; 17.15: Respect each country's leadership to implement policies for poverty eradication and sustainable development	QUARTER Q3 2017
THEMES Human rights: Right to self-determination		LOCATION Disputed territories
MOTIVATION FOR CLOSING ENGAGEMENT In a March 2019 communication with ISS ESG, Innophos confirmed it no longer directly or indirectly sources phosphate rock originating from Western Sahara. As a result, engagement with the company on the topic is satisfactorily completed.		


IOI Corp. Bhd.		ISIN MYL19610O001
	SDG ALIGNMENT SDG 15: Life on Land; 15.2: Sustainable management of all types of forests	QUARTER Q3 2017
THEMES Deforestation: Depletion of biodiversity		LOCATION Indonesia
MOTIVATION FOR CLOSING ENGAGEMENT Since the reinstatement of its RSPO certification, and after reaching an agreement with the NGO Aidenvironment, IOI has made a series of commitments and tracked its implementation in publicly available documents. In October 2018, the RSPO announced that it had closed the complaint and transferred the case to its Investigation Monitoring Unit. As a result of these developments, further engagement on the topic is deemed unnecessary.		


ITOCHU Corp.		ISIN JP3143600009
	SDG ALIGNMENT SDG 15: Life on Land; 15.1: Ensure the conservation and sustainable use of terrestrial and inland freshwater ecosystems, in particular forests, wetlands, mountains and drylands	QUARTER Q2 2015
THEMES Environmental impacts		LOCATION Algeria
MOTIVATION FOR CLOSING ENGAGEMENT ITOCHU Corp. has confirmed that it is no longer participating in the controversial project through a Ramsar site. As such, further engagement on the topic is deemed unnecessary.		

Japan Petroleum Exploration Co., Ltd.		ISIN JP3421100003
	SDG ALIGNMENT SDG 14: Life Below Water; 14.2: Sustainably manage and protect marine and coastal ecosystems	QUARTER Q3 2015
THEMES Environmental impacts: Depletion of biodiversity		LOCATION Russia
MOTIVATION FOR CLOSING ENGAGEMENT Japan Petroleum Exploration Co., Ltd. has been assessed to fall outside of scope of ownership thresholds for Norm-Based Research. As such, further engagement on the topic will not be undertaken.		

JBS SA		ISIN USP59695AC39
	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 Q3 2017
THEMES Working conditions: Occupational health and safety		LOCATION United States
MOTIVATION FOR CLOSING ENGAGEMENT Pilgrim's Pride Corp., JBS SA's 78.5% subsidiary, is assessed to be taking adequate steps to address repeated citations by the United States (U.S.) Occupational Safety and Health Administration (OSHA) for several alleged serious occupational health and safety breaches at its plants in the U.S.		

Jindal Steel & Power Ltd.		ISIN INE749A01030
	SDG ALIGNMENT SDG 1: No Poverty; 1.4: Equal rights to economic resources; SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q3 2018
THEMES Living standards: Stakeholder consultation		LOCATION India
MOTIVATION FOR CLOSING ENGAGEMENT Jindal Steel & Power Ltd.'s (JSPL) expansion of its steel plant in Angul district, Odisha state, and its Gare Palma IV/6 coal mine project in Raigarh district, Chhattisgarh state, have according to local media been criticised for weak consultation processes, breaches of compensation agreements over resettlement and alleged complicity in violence. In communication with ISS ESG, the company stated that an agreement regarding compensation, relocation and employment with the affected communities in Angul has been reached. As no new allegations have been raised against the company's operations in Odisha and Chhattisgarh since 2017, ISS ESG assesses that the controversy is no longer current.		

JXTG Holdings, Inc.		ISIN JP3386450005
	SDG ALIGNMENT SDG 6: Clean Water & Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials; SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q2 2013
THEMES Environmental impacts: Pollution; Depletion of biodiversity		LOCATION Canada
MOTIVATION FOR CLOSING ENGAGEMENT ISS ESG deems the company to no longer be involved in controversies concerning the failure to address environmental impacts in Alberta, Canada.		

Kasikornbank Public Co. Ltd.		ISIN TH0016010009
	SDG ALIGNMENT SDG 2: Zero Hunger; 2.1: End hunger and ensure access by all people to safe, nutritious and sufficient food; SDG 15: Life on Land; 15.1: Ensure the conservation and sustainable use of terrestrial and inland freshwater ecosystems, in particular forests, wetlands, mountains and drylands	QUARTER Q4 2019
THEMES Environmental impacts; Stakeholder consultation: Living standards		LOCATION Laos

MOTIVATION FOR CLOSING ENGAGEMENT

Kasikornbank Public Co. Ltd. financed the construction of the Xayaburi hydropower project on the Mekong River in Laos, a project accused of failing to assess environmental impacts and prevent the depletion of the river's biodiversity. The dam became fully operational in October 2019. As a result, ISS ESG assesses that Kasikornbank is no longer involved in the controversy.

KBR, Inc.

ISIN
US48242W1062


SDG ALIGNMENT

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
Q4 2013

THEMES

Torture/Inhumane treatment

LOCATION
Iraq

MOTIVATION FOR CLOSING ENGAGEMENT

KBR, Inc. is assessed to no longer be associated with allegations that it was complicit in a human trafficking scheme operated by a labour contractor to its Iraqi projects. As such, further engagement on the topic is deemed unnecessary.

Kosmos Energy Ltd.

ISIN
BMG5315B1072


SDG ALIGNMENT

SDG 17: Global partnership for sustainable development; 17.15: Respect each country's leadership to implement policies for poverty eradication and sustainable development

QUARTER
Q1 2014

THEMES

Freedom of expression

LOCATION
Disputed territories

MOTIVATION FOR CLOSING ENGAGEMENT

ISS ESG assesses that the company is no longer engaged in oil and gas exploration off the coast of Western Sahara. As a result, further engagement on the topic is unnecessary.

Krung Thai Bank Public Co., Ltd.


ISIN
TH0150010R11



SDG ALIGNMENT

SDG 2: Zero Hunger; 2.1: End hunger and ensure access by all people to safe, nutritious and sufficient food;
SDG 15: Life on Land; 15.1: Ensure the conservation and sustainable use of terrestrial and inland freshwater ecosystems, in particular forests, wetlands, mountains and drylands

QUARTER
Q4 2019

THEMES Environmental impacts; Stakeholder consultation: Living standards	LOCATION Laos
MOTIVATION FOR CLOSING ENGAGEMENT Krung Thai Bank Public Co. Ltd. financed the construction of the Xayaburi hydropower project on the Mekong River in Laos, a project accused of failing to assess environmental impacts and prevent the depletion of the river's biodiversity. The dam became fully operational in October 2019. As a result, ISS ESG assesses that Krung Thai Bank is no longer involved in the controversy.	

LafargeHolcim Ltd.		ISIN CH0012214059
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels	QUARTER Q1 2017
THEMES Living standards: Stakeholder consultation		LOCATION Indonesia
MOTIVATION FOR CLOSING ENGAGEMENT In January 2019 LafargeHolcim Ltd. announced the sale of its 80.64% stake in PT Holcim Indonesia Tbk, an operation accused of poor stakeholder consultation in the Regency of Blitar, Indonesia, by several NGOs. As a result, further engagement on the topic is deemed unnecessary.		

Malayan Banking Bhd		ISIN MYL115500000
	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 Q3 2015
THEMES Working conditions: Union rights		LOCATION Malaysia
MOTIVATION FOR CLOSING ENGAGEMENT Malayan Banking Bhd. was engaging in anti-union discrimination in Malaysia, according to a complaint submitted in June 2011 to the International Labour Organization’s (ILO) Committee on Freedom of Association (CFA) by the Malaysian Trade Union Congress. No renewed information has emerged on the alleged union rights violation, and ISS ESG assesses that the controversy is no longer current.		

McKesson Corp.		ISIN US58155QAD51
	SDG ALIGNMENT N/A	QUARTER Q2 2014
THEMES Capital punishment	LOCATION United States	

MOTIVATION FOR CLOSING ENGAGEMENT

McKesson Corp. is no longer assessed to be involved in an ongoing failure to address the use of its products in capital punishment in the U.S. Further engagement on the topic is no longer considered necessary, as the company has been taking steps to address issues when they arise as evidenced by its legal action against the state of Arkansas in April 2017 to prevent the misuse of medicines in executions.

MDU Resources Group, Inc.

ISIN
US5526901096


SDG ALIGNMENT

SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning

QUARTER
Q1 2019

THEMES

Climate change

LOCATION
United States

MOTIVATION FOR CLOSING ENGAGEMENT

MDU Resources Group, Inc. was part of legal proceedings, filed in 2015, against the United States (U.S.) Environmental Protection Agency (EPA) to postpone policies tackling climate change. The company and its co-petitioners challenged the Clean Power Plan (CPP), a set of rules issued by the EPA aimed at mitigating climate change by reducing carbon emissions from power plants. However, in June 2019 the EPA issued the Affordable Clean Energy rule (ACE), replacing the CPP and in September 2019, a U.S. Court of Appeals dismissed all legal challenges related to the CPP, finalizing the ACE in its place. As the CPP has been conclusively replaced by the ACE and all rights to appeal have been exhausted, ISS ESG considers the company to no longer be involved in the controversy.

Mitsubishi Motors Corp.

ISIN
JP3899800001


SDG ALIGNMENT

SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes

QUARTER
Q2 2017

THEMES

Pollution

LOCATION
Japan

MOTIVATION FOR CLOSING ENGAGEMENT

Mitsubishi Motors Corp. is taking credible measures to address manipulations of emissions testing for its vehicles. The company's remediation efforts are credible, and its transparent communication on its progress is encouraging. Due to the satisfactory implementation of relevant policies, disclosure and remedial efforts conducted by Mitsubishi Motors, further engagement is deemed unnecessary.


National Express Group Plc


ISIN
GB0006215205



SDG ALIGNMENT


QUARTER


	SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers	Q4 2017
THEMES Working conditions: Union rights		LOCATION United States
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>Durham School Services LP (Durham), a wholly-owned subsidiary of National Express Group Plc, is now taking adequate steps to address allegations that it failed to respect union rights in the United States (U.S.). This new approach by Durham has been acknowledged by local trade unions. Therefore, engagement with the company has been satisfactorily completed.</p>		

NextEra Energy, Inc.		ISIN US65339F1012
	SDG ALIGNMENT SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning	QUARTER Q1 2019
THEMES Climate change		LOCATION United States
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>In March 2019 NextEra Energy, Inc.'s subsidiary Gulf Power Co. withdrew from legal proceedings against the United States (U.S.) Environmental Protection Agency (EPA) to postpone policies tackling climate change. In petitions filed in 2015 Gulf Power and its co-petitioners had challenged the Clean Power Plan (CPP), a set of rules issued by the EPA aimed at mitigating climate change by reducing carbon emissions from power plants. Given Gulf Power's withdrawal from the legal proceedings, ISS ESG deems the companies to no longer be involved in the controversy.</p>		


Nissan Motor Co., Ltd.		ISIN JP3672400003
	SDG ALIGNMENT SDG 12: Responsible Consumption and Production; 12.4: Environmentally sound management of chemicals and all wastes	QUARTER Q2 2017
THEMES Pollution		LOCATION Japan
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>Nissan Motor Co., Ltd.'s subsidiary Mitsubishi Motors Corp. is taking credible measures to address manipulations of emissions testing for its vehicles. Mitsubishi Motors' remediation efforts are credible, and its transparent communication on its progress is encouraging. Due to the satisfactory implementation of relevant policies, disclosure and remedial efforts conducted by Mitsubishi Motors, further engagement is deemed unnecessary.</p>		


NorthWestern Corp.		ISIN US6680743050
	SDG ALIGNMENT SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning	QUARTER Q1 2019
THEMES Climate change		LOCATION United States
MOTIVATION FOR CLOSING ENGAGEMENT NorthWestern Corp. was part of legal proceedings, filed in 2015, against the United States (U.S.) Environmental Protection Agency (EPA) to postpone policies tackling climate change. The company and its co-petitioners challenged the Clean Power Plan (CPP), a set of rules issued by the EPA aimed at mitigating climate change by reducing carbon emissions from power plants. However, in June 2019 the EPA issued the Affordable Clean Energy rule (ACE), replacing the CPP and in September 2019, a U.S. Court of Appeals dismissed all legal challenges related to the CPP, finalizing the ACE in its place. As the CPP has been conclusively replaced by the ACE and all rights to appeal have been exhausted, ISS ESG considers the company to no longer be involved in the controversy.		


Novartis AG		ISIN US66987V1098
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q1 2018
THEMES Bribery		LOCATION Turkey
MOTIVATION FOR CLOSING ENGAGEMENT No new, credible information on Novartis AG's alleged involvement in bribery in Turkey has emerged since investigations were announced in Ankara in 2016. The investigation was launched by Ankara's State Prosecutor after a whistleblower claimed that Novartis' Turkish subsidiary had engaged in bribery between 2013 and 2014. ISS ESG assesses that the controversy is no longer current.		

Nutrien Ltd.		ISIN CA67077M1086
	SDG ALIGNMENT SDG 17: Global partnership for sustainable development; 17.15: Respect each country's leadership to implement policies for poverty eradication and sustainable development	QUARTER Q3 2018
THEMES Human rights: Right to self-determination		LOCATION Disputed territories
MOTIVATION FOR CLOSING ENGAGEMENT		


In March 2019 Nutrien Ltd. was assessed as having implemented credible measures to address previous allegations of importing phosphate from the reserves in Boucraâ mine, located in Moroccan-controlled Western Sahara. As a result, further engagement with the company is deemed unnecessary.


OAS SA		ISIN BRFDS075NJ20
	SDG ALIGNMENT SDG 11: Sustainable Cities and Communities; 11.1: Access for all to adequate, safe and affordable housing; SDG 11: Sustainable Cities and Communities; 11.4: Protect and safeguard the world's cultural and natural heritage;	QUARTER Q3 2016
THEMES Indigenous rights		LOCATION Brazil
MOTIVATION FOR CLOSING ENGAGEMENT OAS SA, through its 11.5% stake in the Consórcio Construtor Belo Monte, was involved in the construction of the Belo Monte hydropower project operated by the Norte Energia consortium on the Xingu River in Brazil which has failed, as established by the International Labour Organization (ILO) in 2012, to meet international standards on free, prior and informed consent (FPIC). The dam became fully operational in November 2019, as OAS fulfilled its contract. As a result, ISS ESG assesses that OAS is no longer involved in the controversy.		

Packages Ltd.		ISIN PK0010001011
	SDG ALIGNMENT 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 Q1 2017
THEMES Working conditions: Child labour		LOCATION Pakistan
MOTIVATION FOR CLOSING ENGAGEMENT Packages Ltd., through its wholly-owned subsidiary Bulleh Shah Packaging (Private) Limited, is assessed to be taking adequate measures to address the reported use of child labour in its agricultural supply chain.		

Peab AB		ISIN SE0000106205
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q1 2019

THEMES Bribery	LOCATION Sweden
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>Peab AB has taken credible measures to improve its anticorruption policies following the conviction of several of its employees for bribery, which took place in Sweden between 2009 and 2013.</p>	


Peabody Energy Corp.		ISIN US7045491047
	SDG ALIGNMENT SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning	QUARTER Q1 2019
THEMES Climate change		LOCATION United States
MOTIVATION FOR CLOSING ENGAGEMENT Peabody Energy Corp. was part of legal proceedings, filed in 2015, against the United States (U.S.) Environmental Protection Agency (EPA) to postpone policies tackling climate change. The company and its co-petitioners challenged the Clean Power Plan (CPP), a set of rules issued by the EPA aimed at mitigating climate change by reducing carbon emissions from power plants. However, in June 2019 the EPA issued the Affordable Clean Energy rule (ACE), replacing the CPP and in September 2019, a U.S. Court of Appeals dismissed all legal challenges related to the CPP, finalizing the ACE in its place. As the CPP has been conclusively replaced by the ACE and all rights to appeal have been exhausted, ISS ESG considers the company to no longer be involved in the controversy.		


Pilgrim's Pride Corp.		ISIN US72147KAA60
	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 Q3 2017
THEMES Working conditions: Occupational health and safety		LOCATION United States
MOTIVATION FOR CLOSING ENGAGEMENT Pilgrim's Pride Corp. is assessed to be taking adequate steps to address repeated citations by the United States (U.S.) Occupational Safety and Health Administration (OSHA) for several alleged serious occupational health and safety breaches at its plants in the U.S.		


Pöyry Oyj		ISIN FI0009006696
	SDG ALIGNMENT	QUARTER


	SDG 2: Zero Hunger; 2.1: End hunger and ensure access by all people to safe, nutritious and sufficient food SDG 15: Life on Land; 15.1: Ensure the conservation and sustainable use of terrestrial and inland freshwater ecosystems, in particular forests, wetlands, mountains and drylands	Q4 2014
THEMES	Environmental impacts; Stakeholder consultation: Living standards	LOCATION Laos
MOTIVATION FOR CLOSING ENGAGEMENT Pöyry Oyj provided consultancy services to the Xayaburi Power Company Limited consortium for the construction of the Xayaburi dam on the Mekong River in Laos, a project alleged to have failed to address impacts on the communities living downstream. The project is also alleged to have failed to assess environmental impacts and prevent the depletion of the river's biodiversity. The dam entered into operation in October 2019. As Pöyry's contract is fulfilled, ISS ESG assesses that the company is no longer involved in the controversy.		

Prosegur Compañía de Seguridad SA		ISIN ES0175438235
	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 2018
THEMES	Working conditions: Union rights	LOCATION Colombia
MOTIVATION FOR CLOSING ENGAGEMENT Prosegur Compañía de Seguridad SA has taken significant steps to resolve allegations of failures to respect its workers' union rights in Colombia, previously raised by the global union federation UNI.		


Pyxus International, Inc.		ISIN US0187721032
	SDG ALIGNMENT 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 2018
THEMES	Working conditions: Child labour	LOCATION Zimbabwe
MOTIVATION FOR CLOSING ENGAGEMENT Pyxus International Inc. (formerly Alliance One International Inc., AOI) has been reported to be taking steps to address previously raised allegations of its exposure to the risk of child labour and poor health and safety standards in its tobacco supply chain in Zimbabwe.		


Raspadskaya PJSC		ISIN RU000A0B90N8
	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 Q3 2012
THEMES Working conditions: Occupational health and safety		LOCATION Russia
MOTIVATION FOR CLOSING ENGAGEMENT EVRAZ Plc, which has fully managed Raspadskaya's operations since 2015, has communicated encouraging efforts to improve health and safety standards at its operations.		


Rio Tinto Ltd. / Rio Tinto Plc		ISIN AU000000RIO1 GB0007188757
	SDG ALIGNMENT SDG 6: Clean Water & Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials; SDG 16: Peace, justice and Strong Institutions; 16.1: Reduce all forms of violence and related death rates everywhere	QUARTER Q1 2017
THEMES Environmental impacts: Pollution		LOCATION Indonesia
MOTIVATION FOR CLOSING ENGAGEMENT In December 2018 Rio Tinto announced that it completed the sale of its entire interest in the Grasberg mine joint venture in on the island of Papua, Indonesia. The mine has been associated with reports of environmental degradation due to the disposal of waste mining rock in local rivers, in a controversial practice known as "riverine tailings".		

Royal Dutch Shell Plc		ISIN GB00B03MM408
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q3 2016
THEMES Bribery		LOCATION Kazakhstan
MOTIVATION FOR CLOSING ENGAGEMENT		


Karachaganak Petroleum Operating BV, a joint venture formed by Eni SpA (29.25%), Royal Dutch Shell Plc (29.25%), Kazmunaigas JSC (10%), Chevron Corp (18%), and Oil Co. LUKOIL PJSC (13.5%) has since 2012 undertaken efforts to address bribery allegations.


Saab AB		ISIN SE0000112385
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q2 2016
THEMES Bribery		LOCATION Brazil
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>Saab AB was previously suspected of involvement in bribery in connection with the sale of its aircraft to Brazil, which was agreed upon in 2014. While an investigation was launched into alleged irregularities, the company was not cited as defendant. That notwithstanding, Saab disclosed to ISS ESG its anticorruption policy, as well as targeted measures to manage risks of privacy, such as an enhanced whistleblower system instituted in 2015. As a result of these developments, further engagement on the topic is deemed unnecessary.</p>		


Sanofi		ISIN US80105NAG07
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q1 2018
THEMES Bribery		LOCATION United States; China; Kenya
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>In April 2019 Sanofi informed ISS ESG that the allegations in the United States claiming the company's free services offered to prescribers constituted kickback payments were dismissed in Court in September 2018. Separately, ISS ESG assesses that allegations of failure to prevent bribery in China and Kenya are no longer current.</p>		

Shougang Hierro Peru Saa		ISIN PEP639001002
	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 Q1 2016

THEMES Working conditions: Union rights	LOCATION Peru
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>While Shougang Hierro Peru Saa has remained unresponsive to ISS ESG's and investors' attempts to establish dialogue, no new allegations of anti-union practices have been raised since 2016. As a result, ISS ESG assesses that the controversy is no longer current.</p>	


Sichuan Hongda Co., Ltd.		ISIN CNE0000019F1
	<p>SDG ALIGNMENT</p> <p>SDG 6: Clean Water & Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials</p>	<p>QUARTER</p> <p>Q3 2015</p>
<p>THEMES</p> <p>Environmental impacts: Pollution</p>		<p>LOCATION</p> <p>China</p>
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>Neither Sichuan Hongda Co., Ltd. nor its 60% owned subsidiary Yunnan Jinding Zinc Co., Ltd. have responded to allegations of having failed to mitigate and remedy soil, water and air pollution at the Lanping lead and zinc mine in Yunnan province, China. However, no new information has emerged since 2015 and ISS ESG assesses that the controversy is no longer current.</p>		

Skanska AB		ISIN SE0000113250
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q4 2016
THEMES Bribery		LOCATION Brazil; Czech Republic; United Kingdom
MOTIVATION FOR CLOSING ENGAGEMENT Skanska AB has introduced effective enhancements to its compliance and anticorruption program.		


SNC-Lavalin Group, Inc.		ISIN CA78460T1057
	<p>SDG ALIGNMENT</p> <p>SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms</p>	QUARTER Q2 2018


THEMES Bribery	LOCATION Algeria; Bangladesh; Cambodia; Canada; Libya
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>Since bribery accusations first emerged in 2012 SNC-Lavalin Group, Inc. has changed the leadership on both board and management level and communicated the formation of a comprehensive ethics and compliance framework. These details have also been communicated in dialogue with ISS ESG and investors.</p>	


State Oil Company of Azerbaijan Republic		ISIN XS0744126961
	<p>SDG ALIGNMENT</p> <p>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 16: Peace, justice and Strong Institutions; 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels</p>	QUARTER Q2 2019
<p>THEMES</p> <p>Working conditions: Occupational health and safety; Stakeholder consultation: Living standards</p>		LOCATION Azerbaijan; Italy
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>In its public disclosures State Oil Company of Azerbaijan Republic (SOCAR) reported that it adopted an action plan to improve health and safety management standards, upgrade production equipment and facilities, introduce regular audits and inspections, as well as training of workers in Azerbaijan. The number of reported fatalities between 2017 and 2019 has been significantly reduced compared to previous years. At the same time, the TAP AG joint venture, in which SOCAR has a 20% stake, continues to face allegations by local communities that it is failing to adequately conduct stakeholder consultation at its Trans Adriatic Pipeline (TAP) project in the Lecce province of Italy, which may have polluted local aquifers. TAP maintains that it “has been consulting with affected stakeholders from the very earliest development phases of the project” and has “developed Stakeholder Engagement Plans (SEP) for each project development phase.”</p>		

Teleperformance SA		ISIN FR0000051807
	<p>SDG ALIGNMENT</p> <p>SDG 8: Decent Work and Economic Growth; 8.8: Protect labour rights and promote safe and secure working environments for all workers</p>	QUARTER Q1 2018
<p>THEMES</p> <p>Working conditions: Union rights</p>		LOCATION Dominican Republic
MOTIVATION FOR CLOSING ENGAGEMENT		


Costa Rica Contact Center CRCC S.A (CRCC), a wholly-owned subsidiary of Teleperformance SA, is taking adequate steps to address allegations that it infringed upon its workers' union rights in the Dominican Republic, according to the global union federation UNI Global Union.


Telia Co. AB		ISIN XS0342338026
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q2 2014
THEMES Bribery		LOCATION Nepal
MOTIVATION FOR CLOSING ENGAGEMENT In 2012 Telia Co. AB was accused in Swedish media of bribery in connection with its entry into the telecommunications market in Nepal in 2008, when it acquired a stake in the local operator Ncell. In December 2015 Telia announced the divestment of its stake in Ncell, and in April 2016 the sale was completed. The company has not faced any new allegations of bribery.		

Teva Pharmaceutical Industries Ltd.		ISIN IL0006290147
	SDG ALIGNMENT SDG 3: Good Health and Wellbeing; 3.8: Achieve universal health coverage	QUARTER Q4 2017
THEMES Consumer health and safety		LOCATION United States
MOTIVATION FOR CLOSING ENGAGEMENT In May 2019, Teva Pharmaceutical Industries Ltd. and its subsidiaries Cephalon, Inc. and Actavis Pharma, Inc., agreed to pay \$85 million to settle a lawsuit alleging that the companies contributed to the opioid epidemic in the state of Oklahoma, United States. Under the settlement which received its final approval in June 2019, Teva agreed neither to employ or contract with sales representatives nor to use key opinion leaders to promote opioids. Teva also agreed to cooperate with investigations involving opioids in Oklahoma.		


The Siam Commercial Bank Public Co. Ltd.		ISIN TH0015010000
	SDG ALIGNMENT SDG 2: Zero Hunger; 2.1: End hunger and ensure access by all people to safe, nutritious and sufficient food;	QUARTER Q4 2019

SDG 15: Life on Land; 15.1: Ensure the conservation and sustainable use of terrestrial and inland freshwater ecosystems, in particular forests, wetlands, mountains and drylands	
THEMES Environmental impacts; Stakeholder consultation: Living standards	LOCATION Laos
MOTIVATION FOR CLOSING ENGAGEMENT The Siam Commercial Bank Public Co. Ltd. (SCB) financed the construction of the Xayaburi hydropower project on the Mekong River in Laos, a project accused of failing to assess environmental impacts and prevent the depletion of the river's biodiversity. The dam became fully operational in October 2019. As a result, ISS ESG assesses that SCB is no longer involved in the controversy.	

The Southern Co.		ISIN US842587CG06
	SDG ALIGNMENT SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning	QUARTER Q3 2017
THEMES Climate change		LOCATION United States
MOTIVATION FOR CLOSING ENGAGEMENT The Southern Co.'s wholly owned subsidiaries Alabama Power Co., Georgia Power Co., and Mississippi Power Co. were part of legal proceedings filed in 2015 against the United States (U.S.) Environmental Protection Agency (EPA) to postpone policies tackling climate change. The company and its co-petitioners challenged the Clean Power Plan (CPP), a set of rules issued by the EPA aimed at mitigating climate change by reducing carbon emissions from power plants. However, in June 2019 the EPA issued the Affordable Clean Energy rule (ACE), replacing the CPP and in September 2019 a U.S. Court of Appeals dismissed all legal challenges related to the CPP, finalizing the ACE in its place. As the CPP has been conclusively replaced by the ACE and all rights to appeal have been exhausted, ISS ESG considers the company to no longer be involved in the controversy.		


TISCO Financial Group Public Co. Ltd.		ISIN TH0999010R11
	<p>SDG ALIGNMENT</p> <p>SDG 2: Zero Hunger; 2.1: End hunger and ensure access by all people to safe, nutritious and sufficient food;</p> <p>SDG 15: Life on Land; 15.1: Ensure the conservation and sustainable use of terrestrial and inland freshwater ecosystems, in particular forests, wetlands, mountains and drylands</p>	<p>QUARTER</p> <p>Q4 2019</p>
<p>THEMES</p> <p>Environmental impacts; Stakeholder consultation: Living standards</p>		<p>LOCATION</p> <p>Laos</p>
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p>		


TISCO Financial Group Public Co. Ltd. (TISCO) financed the construction of the Xayaburi hydropower project on the Mekong River in Laos, a project accused of failing to assess environmental impacts and prevent the depletion of the river's biodiversity. The dam became fully operational in October 2019. As a result, ISS ESG assesses SCB to no longer be involved in the controversy.


Turkiye Garanti Bankasi AS		ISIN TRAGARAN91N1
	SDG ALIGNMENT SDG 1: No Poverty; 1.4: Equal rights to economic resources; 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 and sustainable use of terrestrial and inland freshwater ecosystems, in particular forests, wetlands, mountains and drylands; SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species	QUARTER Q2 2015
	THEMES Environmental impacts: Depletion of biodiversity; Stakeholder consultation: Living standards	LOCATION Turkey
MOTIVATION FOR CLOSING ENGAGEMENT Turkiye Garanti Bankasi AS (GarantiBank) has been financing the construction of the Ilisu hydropower dam on the Tigris River in southeast Turkey, which was allegedly built without an adequate environmental impact assessment, and has faced criticism for alleged poor stakeholder consultation and forced displacement of local people. Impoundment of the Ilisu dam's reservoir began in July 2019. Since the construction of the project is completed, GarantiBank's leverage, as a financier, is limited.		

Turkiye Halk Bankasi AS		ISIN TRETAL00019
	SDG ALIGNMENT SDG 1: No Poverty; 1.4: Equal rights to economic resources; 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 and sustainable use of terrestrial and inland freshwater ecosystems, in particular forests, wetlands, mountains and drylands; SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species	QUARTER Q2 2015
	THEMES Environmental impacts: Depletion of biodiversity; Stakeholder consultation: Living standards	LOCATION Turkey
MOTIVATION FOR CLOSING ENGAGEMENT		


Turkiye Halk Bankasi AS (HalkBank) has been financing the construction of the Ilisu hydropower dam on the Tigris River in southeast Turkey, which was allegedly built without an adequate environmental impact assessment, and has faced criticism for alleged poor stakeholder consultation and forced displacement of local people. Impoundment of the Ilisu dam's reservoir began in July 2019. Since the construction of the project is completed, HalkBank's leverage, as a financier, is limited.


United Co. RUSAL Plc		ISIN JE00B5BCW814
	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 2016
THEMES Working conditions: Union rights		LOCATION Guyana
MOTIVATION FOR CLOSING ENGAGEMENT United Co. RUSAL Plc's 90% subsidiary in Guyana, Bauxite Company of Guyana, Inc. (BCGI), is taking credible steps to address allegations that it has infringed upon its workers' union rights in Guyana.		

Universal Corp.		ISIN US9134561094
	SDG ALIGNMENT 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 2018
THEMES Working conditions: Child labour		LOCATION Zimbabwe
MOTIVATION FOR CLOSING ENGAGEMENT Universal Corp. has been reported to be taking steps to address previously raised allegations of its exposure to the risk of child labour and poor health and safety standards in its tobacco supply chain in Zimbabwe.		


Vedanta Resources Ltd.		ISIN US92241TAG76
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q1 2015
THEMES Bribery		LOCATION India
MOTIVATION FOR CLOSING ENGAGEMENT		


In September 2015 the Anti-Corruption Bureau (ACB) of the Indian state of Rajasthan reportedly filed for an investigation into allegations of possible corruption linking Hindustan Zinc Ltd. – Vedanta Ltd.’s 64.92% subsidiary (in turn a 62.85% Vedanta Resources Plc subsidiary) – to a Rajasthan state mining secretary. However, the ACB has not responded to ISS ESG’s enquiries about the current status of the investigation, and no new allegations have emerged. ISS ESG assesses that the controversy is no longer current.


VEON Ltd.		ISIN US92719A1060
	SDG ALIGNMENT 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 SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q2 2017
THEMES Working conditions: Child labour, Bribery		LOCATION Uzbekistan
MOTIVATION FOR CLOSING ENGAGEMENT No new allegations of complicity in child and forced labour in Uzbekistan have been raised against VEON Ltd. since 2014, and the industry-wide labour rights issues have been confirmed by the International Labour Organization as adequately addressed. Separately, in October 2019 VEON Holdings BV’s wholly owned subsidiary VEON Ltd. (formerly VimpelCom Ltd.) announced the conclusion of the Deferred Prosecution Agreement (DPA) with the United States (U.S.) Department of Justice (DoJ), entered in February 2016, and the end of the compliance monitoring, which was part of the DPA and settlement with the U.S. Securities and Exchange Commission (SEC).		

Vistra Energy Corp.		ISIN US26817RAA68
	SDG ALIGNMENT SDG 13: Climate Action; 13.2: Integrate climate change measures into national policies, strategies and planning	QUARTER Q3 2017
THEMES Climate change		LOCATION United States
MOTIVATION FOR CLOSING ENGAGEMENT Vistra Energy Corp., through several of its wholly owned subsidiaries including Vistra Operations Co. LLC, Luminant Generation Company LLC, Big Brown Power Company LLC, Sandow Power Company LLC, and Luminant Mining Company LLC (together referred to as Luminant), was part of legal proceedings filed in 2015 against the United States (U.S.) Environmental Protection Agency (EPA) to postpone policies tackling climate change. The company and its co-petitioners challenged the Clean Power Plan (CPP), a set of rules issued by the EPA aimed at mitigating climate change by reducing carbon emissions from power plants. However, in June 2019 the EPA issued the Affordable Clean Energy rule (ACE), replacing the CPP, and in September 2019 a U.S. Court of Appeals dismissed all legal challenges related to the CPP, finalizing the ACE		


in its place. As the CPP has been conclusively replaced by the ACE and all rights to appeal have been exhausted, ISS ESG considers the company to no longer be involved in the controversy.


Wah Seong Corp. Bhd.		ISIN MYL514200004
	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 2016
THEMES Environmental impacts: Deforestation; Depletion of biodiversity		LOCATION Republic of Congo
MOTIVATION FOR CLOSING ENGAGEMENT In December 2017 Wah Seong Corp. Bhd. sold its subsidiary WS Agro Industries Pte Ltd, a 49% owner of the Atama Plantation SARL, which according to the NGO Rainforest Foundation UK is involved in deforestation that threatens the critically endangered western lowland gorilla at its oil palm plantations in the Congo Basin in the Republic of Congo.		


Wal-Mart de México SAB de CV		ISIN MXP810081010
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q2 2019
THEMES Bribery		LOCATION Mexico
MOTIVATION FOR CLOSING ENGAGEMENT Walmart, Inc., which indirectly holds 70.51% of Wal-Mart de México SAB de CV, reported that it entered a global settlement with the United States (U.S.) Department of Justice (DoJ) and Securities and Exchange Commission (SEC) and agreed to pay a fine of \$282.7 million to settle allegations that the global retailer engaged in violations of the Foreign Corrupt Practices Act (FCPA).		

Walmart, Inc.		ISIN US9311421039
	SDG ALIGNMENT SDG 16: Peace, justice and Strong Institutions; 16.5: Reduce corruption and bribery in all their forms	QUARTER Q4 2019
THEMES Bribery		LOCATION

	Brazil; China; India; Mexico
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>Walmart, Inc. reported that it entered a global settlement with the United States (U.S.) Department of Justice (DoJ) and Securities and Exchange Commission (SEC) and agreed to pay a combined fine of \$282.7 million to settle allegations that the global retailer engaged in violations of the Foreign Corrupt Practices Act (FCPA) and conducted business without “a system of sufficient anti-corruption related internal accounting controls” from July 2000 through April 2011.</p>	

WTK Holdings Bhd.		ISIN MYL424300001
	<p>SDG ALIGNMENT</p> <p>SDG 15: Life on Land; 15.2: Sustainable management of all types of forests;</p> <p>SDG 15: Life on Land; 15.5: Protect and prevent the extinction of threatened species</p>	<p>QUARTER Q3 2018</p>
<p>THEMES</p> <p>Environmental impacts: Deforestation</p>		<p>LOCATION Malaysia</p>
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>WTK Holdings Bhd. has publicly referred to its efforts in reducing negative impacts from logging and plantations, including reforestation and “Reduced Impact Logging” techniques. No new allegations have been raised since 2012.</p>		

Zijin Mining Group Co., Ltd.		ISIN CNE100000502
	<p>SDG ALIGNMENT</p> <p>SDG 6: Clean Water & Sanitation; 6.3: Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials</p> <p>SDG 6: Clean Water & Sanitation; 6.1: Universal and equitable access to safe and affordable drinking water</p>	<p>QUARTER Q4 2014</p>
<p>THEMES</p> <p>Environmental impacts: Water pollution</p>		<p>LOCATION China</p>
<p>MOTIVATION FOR CLOSING ENGAGEMENT</p> <p>Zijin Mining Group Co., Ltd. has taken measures to improve its tailings management. No significant allegations of pollution have been raised against the company’s mining activities in China since at least 2011.</p>		

Zuari Agro Chemicals Ltd.		ISIN INE840M01016
	SDG ALIGNMENT 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 Q2 2016
THEMES Working conditions: Child labour		LOCATION India
MOTIVATION FOR CLOSING ENGAGEMENT While the NGO Advocating Rights in South Asia (ARISA), formerly known as India Committee of the Netherlands, stated in August 2019 that the child labour situation in Zuari Agro Chemicals Ltd.'s supplier farms had not been fully remediated, the organization was not able to provide supporting documentation.		

Appendix A



ISS ESG is the responsible investment arm of Institutional Shareholder Services Inc., the world's leading provider of environmental, social, and governance solutions for asset owners, asset managers, hedge funds, and asset servicing providers. With more than 30 years of corporate governance expertise and 25 years of providing in-depth responsible investment research and analytics, ISS ESG has the unique understanding of the requirements of institutional investors. With its comprehensive offering of solutions, ISS ESG enables investors to develop and integrate responsible investing policies and practices, engage on responsible investment issues, and monitor portfolio company practices through screening solutions. It also provides climate data, analytics, and advisory services to help financial market participants understand, measure, and act on climate-related risks across all asset classes. In addition, ISS ESG delivers corporate and country ESG research and ratings enabling its clients to identify material social and environmental risks and opportunities.

POOLED ENGAGEMENT

ISS ESG's Pooled Engagement offering is a dialogue and engagement service that is carried out with companies that have been identified through ISS ESG's Norm-Based Research offering as having failed to address reported allegations – or controversies – of adverse impacts on society and the environment in contravention of established expectations for responsible business conduct as set out in international norms such as the UN Global Compact's ten principles and the OECD Guidelines for Multinational Enterprises. The Norm-Based Research framework also takes into consideration the intersections between the Sustainable Development Goals and the private sector.

During the Norms-Based Research research phase, ISS ESG carries out extensive dialogue with companies and expert stakeholders – governmental or inter-governmental bodies, NGOs, academic organisations – to validate all facts relevant to an identified controversy. The in-depth research conducted under Norm-Based Research identifies gaps in company disclosure and approaches to addressing reported allegations. This analysis also constitutes the grounds for ascertaining if the desired level of disclosure might be achieved through investor dialogue.

Investor engagement, facilitated by ISS ESG through Pooled Engagement, is a continuation and escalation of the research dialogue. ISS ESG's Pooled Engagement approach encourages, on behalf of those investor clients participating in the Pooled Engagement, companies to elaborate on efforts taken to design and implement better risk management systems at the operational level, to minimize the risk for re-occurrence of failures to respect international norms and standards for responsible business conduct.

Around 100 companies are selected for Pooled Engagement each calendar year. Each client of the Pooled Engagement service determines at its own discretion the engagements in which it would like to participate.