Revealing the full picture

Your guide to ESG reporting

Guidance for issuers on the integration of ESG into investor reporting and communication
Introduction

Once upon a time, environmental, social and governance (ESG) factors were a niche interest among asset owners, asset managers, banks, brokers and investment consultants. No longer. Investors now routinely analyse information on ESG performance alongside other financial and strategic information in order to gain a better understanding of companies’ future prospects.

Issuers’ ESG performance on subjects such as resource use, human rights, health and safety, corruption and transparency is increasingly used to draw conclusions about the quality of their management, identify their exposure to business risks and assess their ability to leverage business opportunities. Therefore it is becoming more and more important for companies and other issuers to communicate with investors clearly and accurately on these aspects of their performance.

The intention of this Guidance is to help companies gain a clear understanding of what ESG information they should provide and how they should go about providing it. This is a task for which London Stock Exchange Group, as a leading international markets infrastructure provider connected to issuers, sell side and investors is ideally placed.

About London Stock Exchange Group

Sitting at a critical junction between issuers and investors, London Stock Exchange Group plays an essential role in supporting sustainable economic development through a number of our businesses around the world. This ESG guide is an important new tool to encourage and assist issuers in providing ESG information that investors can use to inform their engagement with companies and their investment decisions. I hope this report helps improve transparency and disclosure in this increasingly important area.”

Who this Guidance is for

Institutional investors are interested in ESG issues for all of the entities they invest in, irrespective of whether they are large or small, equities or bonds, listed or unlisted, across all industries. And in our view, whatever the entity in question, the characteristics of high quality reporting and effective communication with investors are always broadly the same. Therefore we believe that you will find this Guidance equally relevant to your organisation whether it is a large publicly listed issuer with a long track record of reporting, a smaller company, a privately held business, or a debt issuer.

How investors use ESG information is changing

In recent years, the views of investors in this area have matured significantly. ESG-related information has moved from a ‘peripheral’ to a ‘core’ part of investment analysis, across all asset classes.

Signatories to the United Nations-supported Principles for Responsible Investment (PRI) now represent $60tn in assets under management, up from $22tn in 2010. Almost all leading institutional investors of UK and Italian listed companies are PRI signatories. Recent research from the Global Sustainable Investment Alliance (GSIA) suggests that sustainable investing strategies now represent more than 60% of professionally managed assets for EU investors.

The need for issuers to respond to this demand for information is clear. By disclosing the information that investors want, issuers can provide reassurance that they are effectively managing business risks and identifying opportunities. There is growing evidence that issuers that publish high quality information on the longer-term implications of ESG for their business are more likely to attract and retain long-term investors. These issuers can also reduce the cost of capital and increase their ability to raise new capital to finance sustainable projects.

The process of reflecting on, analysing and reporting ESG issues provides important insights into the positive and negative implications for financial and operational performance. This also applies to decisions about strategy and capital expenditure. Further, having a clear view on ESG issues and strategy positions businesses at the forefront of opportunities presented by the unfolding sustainable and green economy.

While there is a compelling case for companies strengthening their reporting on ESG issues, research suggests that Chief Executives tend to overestimate the success in communicating with investors: in a recent study, over a third of companies believed they were able to quantify the business value of sustainability initiatives accurately, yet only 7% of investors agreed. This discrepancy can be ascribed to a number of practical challenges, including investors finding it difficult to access appropriate data and information; issuers failing to understand what information investors need; investors using different ESG information in their investment research and raising different questions with issuers; and issuers’ needs and interests differing in terms of the ESG issues that they see as important.

The aims of this Guidance are to:

- make companies more aware of the importance of providing high quality ESG information, and engaging investors on sustainability-related issues;
- stimulate interest in the innovation opportunities opened by this new economic paradigm;
- help issuers and investors to navigate the complex landscape of ESG reporting;
- enable richer data flows and dialogue on ESG between issuers and investors;
- support the consolidation of sound global reporting standards; and
- enable investors to make better informed investment decisions.

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Towards deeper understanding between issuers and investors

In publishing this ESG Reporting Guidance, our aim is to help enable your company to effectively navigate the reporting landscape of today and tomorrow.

“ESG reporting is not just for larger companies. This is about all issuers, regardless of size, reporting relevant and material information to investors so that they can make better informed investment decisions.”

Mark Zinkula
CEO, Legal & General Investment Management

You don’t have to be big to be an ESG reporter

The ESG dimension is not something only larger companies need to concern themselves with. When a small or mid-sized issuer understands the value of ESG data and reporting, investors’ ability to see the full picture of its performance and prospects is enhanced just as much.

London Stock Exchange Group (LSEG) is the global market of choice for such smaller companies. Over 1,000 of them are quoted on AIM in the UK and Italy, more than 460 belong to our ELITE programme for dynamic private companies, and we also enable the issuance of corporate bonds by smaller companies.

The Guidance is intended to help both companies that have a long history of ESG reporting and those that are less experienced in it.

ESG data and information can be provided by a company to a wide range of stakeholders. This Guidance is specifically focused on the dialogue and information flows between issuers and investors.

In dealing with good practice in voluntary reporting to investors, the Guidance is in line with the UN-backed Sustainable Stock Exchanges initiative model guidance for exchanges. We believe that it is time to move beyond the debate around mandatory versus voluntary reporting. Issuers should now focus on innovation and relevance in the information they provide to investors – and ESG is part of that picture.

Is ‘ESG’ the same as ‘sustainability’ and ‘corporate responsibility’?

Many companies use ‘sustainability’, ‘corporate responsibility’ or ‘corporate social responsibility’ to refer to strategies or programmes related to environmental, social or governance (ESG) activities. We make no particular recommendation concerning which term to use.

For the purpose of this Guidance, LSEG has chosen to use the term ‘ESG’ as it has become a commonly-used investment term. Other terms for this type of ESG reporting can include ‘non-financial’ and ‘extra-financial’ reporting.

“We have a fiduciary duty towards our members and we are committed to protecting retirement savings from any potential investment risk within a long-term horizon. The best way to do this is to take not only financial and economic factors but also ESG performance into consideration.”

Maurizio Agazzi
Direttore Generale, Fondo Pensione Cometa

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ESG reporting priorities

We have identified eight priorities for ESG reporting.

1. Strategic relevance
   What is the relevance of ESG issues to business strategy and business models?
   Page 8

2. Investor materiality
   What do investors mean by materiality?
   Page 12

3. Investment grade data
   What are the essential characteristics of ESG data?
   Page 18

4. Global frameworks
   What are the most important ESG reporting standards?
   Page 22

5. Reporting formats
   How should ESG data be reported?
   Page 28

6. Regulation and investor communication
   How can companies navigate regulations and communicate effectively?
   Page 32

7. Green Revenue reporting
   How can issuers get recognition for green products and services?
   Page 36

8. Debt finance
   What should debt issuers report and what are the emerging standards here?
   Page 40
Investors want to understand how issuers are responding to long-term and macroeconomic trends such as climate, demographic and technological change as well as political developments. A number of the world’s largest investors are allocating capital to companies that are well equipped to benefit from the transition to the green economy, and wish to protect their portfolios against downside environmental, social and governance (ESG) risks.

As an issuer, you should explain the relevance of ESG factors to your business model and strategy. You should make clear how your company is positioning itself, either to benefit from these factors or to manage and mitigate the risks associated with them.

Issuers should also explain how they intend to access the new opportunities and revenue streams generated by green and socially beneficial products and services.

01 Strategic relevance

What is the relevance of ESG issues to business strategy and business models?
GREEN ECONOMY EXPLAINED

Over the last 300 years there have been a number of economic cycles as new industries have emerged and revolutionised economies both nationally and globally. Previous cycles have been linked to the introduction of the steam engine, electricity, mass automation, and recently information technology and computing. A number of economists now suggest that we are rapidly moving into the next cycle of economic change linked to industrial changes to overcome climate change, environmental erosion and resource depletion. The Paris Agreement that entered into force in November 2016, marked an important turning point.

It aims to ‘keep a global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius’. Achieving its goals by meeting the signatories’ nationally determined contributions (‘NDCs’) requires the growth of new products and new ‘green’ industrial sectors in areas including renewable energy, energy efficiency, waste processing and recycling. The green economy encompasses these sectors and services, and companies that demonstrate their contribution to the green economy are attracting investment.

How ESG issues can impact business models and strategies

The ESG issues and trends that can have a powerful impact on business models are varied. Some possible examples include:

— a confectionery company that sources cocoa from West Africa explaining their readiness for increased levels of drought;

— an integrated oil and gas business explaining how carbon costs and changing energy demands linked to carbon intensity would impact their reserve portfolio and how future pricing scenarios link into their exploration and production strategy;

— a professional services outsourcing firm outlining the increasing international demand for highly skilled staff and explaining their approach to motivating, retaining and developing their workforce in order to reduce high turnover rates of skilled staff.

“Sustainability factors, such as climate change or demography, impact companies’ operating environments. It is therefore critical that companies provide a clear strategic view on the likely impact of such trends or factors on their business models. This will allow investors to understand how they are positioned, and provide confidence that they are resilient and can where possible exploit opportunities from a changing environment.”

Steve J. Berexa
Global CIO Equity and Global Head of Research,
Allianz Global Investors

It is important for any company to be able to explain how its core business models and strategies may be impacted by ESG trends, and how it is seeking to position itself either to benefit from them or manage and mitigate risks associated with them. This provides the context for ESG reporting and allows investors to assess how well prepared the company is strategically for changes in its operating environment.

A number of the world’s largest investors are allocating additional capital to companies that have higher green revenue exposure or are better equipped to fulfil sustainable goals.

Demonstrating resilience as well as readiness to transition to a sustainable and green economy is relevant for issuers across a number of industries and sectors. This means looking beyond the risks to new opportunities and revenue streams generated by green and socially beneficial products and services. These can drive value for the organisation and provide social and environmental solutions.

Integrating both financial and non-financial performance requires leadership and support from the Board and senior management. They play a central role in integrating sustainability into the business strategy, overseeing implementation across the business and communicating to investors. At a working level in larger companies, investor relations, finance functions and CSR or sustainability divisions will need to align to ensure the quality and consistency of information reported.
To understand a company's long-term prospects, investors will focus on those issues that they believe to be most relevant – or 'material' – to any particular business. However, different investors inevitably have different views on what they see as material.

Issuers should explain which ESG issues they see as most relevant or material to their business. They should explain how ESG issues may affect their business, e.g. through legislation, reputational damage, employee turnover, licence to operate, legal action or stakeholder relationships. They should then explain how these impacts may affect business strategy and financial and operational performance.

When presenting this information to investors, it is important to understand what information and data your investors are looking for. This should include ensuring you are informed about what your industry peers globally are reporting on.
How to identify material ESG themes

There is no standard template for a successful materiality assessment and issuers need to find the approach that is appropriate for their organisation. There are a number of considerations that can help companies identify what is relevant to their business and what the critical issues are to report on.

1. Align with what international standards recommend and peer companies report. This facilitates comparability for investors globally.

2. Use tools at your disposal. ESG research and index providers have specific criteria and identified material themes for different companies and industrial sectors. FTSE Russell, a London Stock Exchange Group business, has a well-developed model which may be helpful in this regard. See more on pages 50 and 51.


‘MATERIALITY’ DEFINED

The International Accounting Standards Board defines ‘material’ information as that which could, if omitted or misstated, influence the economic decisions of readers relying on the financial statements. The UK FRC’s ‘Clear & Concise’ guidance to narrative reporting states that ‘information is material if its omission or misrepresentation could influence the economic decisions shareholders take on the basis of the annual report as a whole’.

Example

Index membership: FTSE 100
ICB subsector: Recreational Services
A FTSE 100 company in the travel and leisure sector conducts a materiality assessment every two years. This allows the business to update its understanding of the issues that influence stakeholder (including investor) perceptions and decision-making, and to respond effectively to sustainability-related opportunities and risks.

Its materiality assessment process involves:
— re-evaluating the previous assessment;
— reviewing relevant standards;
— engaging with internal and external stakeholders;
— benchmarking the strategy against industry and broader corporate best-practice; and
— reviewing operational impacts and sustainability trends.

The full list of issues is plotted on a matrix based on significance to the business and relative concern to stakeholders.

Index membership: FTSE Small Cap
ICB subsector: Software
A small-cap software business has a strong reliance on employees, reflected in its vision: ‘To enable outstanding people to create digital solutions that have a positive impact on people’s lives.’ Noting that employee retention is a key risk, the company includes data on its staff attrition rate and its ‘Best Companies to Work For’ rating in its KPIs.

“One size does not fit all when it comes to ESG data. Although there is a need for consistency, there is also a need to focus on investor materiality to ensure that the data being reported is of relevance to investors.”

James Bevan
CIO, CCLA Investment Management
1. CLIMATE CHANGE

The investment case
Investors often want to understand whether businesses can:
— successfully respond to climate change risks;
— demonstrate future stability and resilience, and
— achieve cost savings through efficiencies and identify opportunities through new revenue opportunities.

The sources of investment risks
Key sources of investment risk and opportunity:
— regulatory standards, taxes, carbon pricing,
— market reduced demand for high-carbon goods, products and services and decreased capital availability for high carbon products,
— capital increased capital availability for low-carbon services and technologies, and
— weather-related disasters and resource risks.

Example indicators of practice and performance

<table>
<thead>
<tr>
<th>Type</th>
<th>Description</th>
<th>Applicability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Qualitative</td>
<td>Three years of total energy consumption data</td>
<td>All</td>
</tr>
<tr>
<td>Quantitative</td>
<td>GHG emissions per megawatt-hr</td>
<td>Conventional, Electricty</td>
</tr>
<tr>
<td>Qualitative</td>
<td>Board oversight of climate change:</td>
<td>All</td>
</tr>
<tr>
<td></td>
<td>a. Evidence of board or board committee oversight of the management of climate change risks</td>
<td></td>
</tr>
<tr>
<td></td>
<td>b. Named position responsible at Board Level</td>
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</tbody>
</table>

2. TAX TRANSPARENCY

The investment case
Investors often want to understand whether businesses can:
— not only comply with tax arrangements, but also have a strong governance process and transparency around their tax policy and tax arrangements, and
— demonstrate commitment to transparency by engaging with stakeholders and the public to communicate their contributions to local economies.

The sources of investment risks
Key sources of investment risk and opportunity:
— regulatory risks of increased regulation which could close particular tax arrangements, referred to by some as 'loopholes' which would mean reduced margins and profitability of particular companies. In some cases, it may even affect a company's ability to operate in certain markets, and
— reputational increased scrutiny of corporate tax behaviour.

Example indicators of practice and performance

<table>
<thead>
<tr>
<th>Type</th>
<th>Description</th>
<th>Applicability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Qualitative</td>
<td>A policy: commitment to</td>
<td>All</td>
</tr>
<tr>
<td></td>
<td>a. Tax transparency or tax responsibility</td>
<td></td>
</tr>
<tr>
<td></td>
<td>b. Align tax payments with revenue-generating activity, or reduce or refrain from the use of offshore secrecy jurisdictions for the purposes of tax planning</td>
<td></td>
</tr>
<tr>
<td>Qualitative</td>
<td>Board has oversight of tax policy:</td>
<td>All</td>
</tr>
<tr>
<td></td>
<td>a. Evidence of board oversight of the management of tax risks</td>
<td></td>
</tr>
<tr>
<td></td>
<td>b. Named position responsible at Board Level</td>
<td></td>
</tr>
<tr>
<td>Quantitative</td>
<td>Disclosure of corporate tax paid globally:</td>
<td>All</td>
</tr>
<tr>
<td></td>
<td>a. With at least domestic and international breakdown</td>
<td></td>
</tr>
<tr>
<td></td>
<td>b. With country by country breakdown</td>
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</tbody>
</table>

3. HUMAN RIGHTS & COMMUNITY

The investment case
Investors want businesses that:
— engage in active discussion around human rights and community issues,
— demonstrate operational robustness and reputational resilience by addressing their impact on the communities in which they operate, and
— have strong and positive relationships with communities.

The sources of investment risks
Key sources of investment risk and opportunity:
— regulatory costs associated with regulating compliance,
— market increased exposure to human rights risks in supply chain,
— reputational risks caused by community relations and human rights issues; and
— operations increased chance of operational shut downs or revocation of licenses, if the local community resists or protests the presence of the business.

Example indicators of practice and performance

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<tr>
<th>Type</th>
<th>Description</th>
<th>Applicability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Qualitative</td>
<td>Stakeholder engagement to verify human rights risks and impacts:</td>
<td>All</td>
</tr>
<tr>
<td></td>
<td>a. Evidence of consultation taking place</td>
<td></td>
</tr>
<tr>
<td></td>
<td>b. Documented meetings OR reports</td>
<td></td>
</tr>
<tr>
<td>Qualitative</td>
<td>How the issuer addressed freedom of expression through:</td>
<td>All</td>
</tr>
<tr>
<td></td>
<td>a. Having a statement/policy</td>
<td></td>
</tr>
<tr>
<td></td>
<td>b. Being a member of a relevant industry initiative such as the Global Network Initiative</td>
<td></td>
</tr>
<tr>
<td>Qualitative</td>
<td>Total amount of corporate or group donations/community investments made to registered not-for-profit organisations</td>
<td>All</td>
</tr>
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</table>

FTSE Russell has drawn from global standards and frameworks in the development of its ESG model. The model involves producing an overall ESG Rating based on the three pillars of Environment, Social and Governance and in 14 Themes adapted to reflect their materiality to each company.

Three of the 14 Themes are shown opposite to outline selected examples of the ESG data — both qualitative and quantitative — that issuers can be expected to disclose against specific, material themes. For more details on the methodology please see www.ftserussell.com/esg

The ‘Exposure’ factor in FTSE Russell’s ESG Ratings

The ESG Ratings service operated by FTSE Russell identifies 14 Themes, spread across the three ESG pillars, most of which include several relevant quantitative indicators. Its methodology includes ‘Exposure’, which categorises the materiality of the 14 Themes for a particular company as High, Medium, Low or Not Applicable. Based on a matrix, this categorisation considers business involvement across different countries and sectors. It uses a variety of robust, globally-accepted frameworks, and can help issuers discern which ESG Themes they are exposed to, and how to begin reporting on them. This can form a starting point for the potential ESG themes an investor may regard as material for a company.
When using ESG data to inform capital allocation and investment decision-making, investors want ESG information to be complete, consistent, reliable, comparable and clear.

Issuers should ensure that the data they provide is accurate, timely, aligned with the issuer’s fiscal year and business ownership model (i.e. aligned boundaries), and based on consistent global standards to facilitate comparability.

Raw as well as normalised data should be provided, and your company should offer a balanced view that highlights both positives and negatives in its performance.

To provide investors with a greater degree of confidence in their reported data, some issuers choose to have their ESG data assured.
Revealing the full picture

03. Investment grade data

Characteristics of investment grade data

Accuracy: deploy rigorous data collection systems

Boundaries: align to the fiscal year and business ownership model

Comparability and consistency: use consistent global standards to facilitate comparability

Data provision: provide raw as well as normalised data

Timeliness: provide data to coincide with the annual reporting cycle

External assurance: consider strengthening the credibility of data by having it assured

Balance: provide an objective view including both favourable and unfavourable information

Accuracy

As an issuer, you should have rigorous data collection systems and processes for ESG. When preparing data collection, you should pay particular attention to:

— Internal systems: assess the ability of existing systems (for example internal audit and risk and data control verification systems) to support data collection;

— Internal assurance: establish strong internal assurance processes, including having these overseen by or under the governance of the board audit committee;

— Data quality: ensure that the quality of the data collected and reported is understood and documented. Issuers should collate information on how the data was compiled, what assumptions were made, and whether any uncertainties or limitations apply to the data. Data sources must be appropriate, reliable and evidenced. Any data challenges should be identified and the implications assessed;

— Data reliability: this should be tested through internal reviews and conducted by internal audit. Issuers can also consider engaging third-party assurance providers; and

— Assumptions: report key assumptions that underpin reporting.

Boundaries

Issuers need to take account of two distinct sets of boundaries: timeframes and operations.

— Timeframes: ESG data should match your fiscal year and hence match the time period for the annual report. This allows investors to cross-use the two different data sets, for example normalising certain ESG data by revenues or staff numbers.

— Operations: ESG data should cover 100% of the issuing entity and apply the same principles as financial data. If your company has partial ownership of certain subsidiaries (perhaps without operational control), the data should be reported on a percentage ownership basis in order to accurately reflect the proportional exposure the company has to these businesses, unless national reporting rules have different requirements.

In situations where parts of the business were acquired or sold during the reporting period, data should be provided on both a consolidated and separate basis.

Comparability and consistency

In order to allow comparability between peers, it is important to use consistent global standards when reporting. Issuers should use indicators and metrics that are widely used within their sector, aiming to gather data in line with common practice and to report in a similar manner to sector peers. Issuers should consider using standard denominators when normalising data. The methods used to collect and calculate data should remain consistent year-on-year. If data compilation methodologies or underlying assumptions change, issuers need to explain the changes that have been made. Where these changes have had a significant effect on results, data for previous years should be recalculated using the new methodology or assumptions to enable comparison.

Data provision

Generally, investors will prefer to normalise ESG data themselves so that they can apply their models consistently across companies. They therefore expect issuers to provide raw as well as normalised data. However, issuers should be aware of ways they can support investors in using and interpreting the results:

— Contextual data: investors are interested in putting data into context. Companies can help by providing, in a readily accessible manner, measures of financial activity such as turnover, the countries and markets in which they operate, the number of staff and contractors and, where relevant, the quantity, weight or volume of product outputs;

— Normalised data: interpretation of progress around targets that are set on a normalised basis can be useful for investors. This should be provided alongside – not instead of – raw data; and

— Explanation: issuers should supplement quantitative data with narrative explaining the factors that have influenced performance, whether positively or negatively. Further, where there are core business differences or client segments that explain performance relative to peers, these should also be explained.

Timeliness

It is best practice to provide ESG data at the same time as the annual report and accounts, or as soon as possible afterwards.

A company may need to communicate sooner when a significant incident or controversy has taken place, or has been alleged. In these situations, investors do not expect to wait for the next annual reporting cycle.

External assurance

As an issuer you may seek to strengthen the credibility of your ESG data through external assurance. This can be conducted through the same processes as financial reporting, using qualified auditors. We recommend that the levels, scope and process adopted for external assurance are clearly described in the report.

Balance

Issuers should provide an objective picture of their performance, presenting both favourable and unfavourable information clearly and in full to aid the reader’s understanding. Efforts to avoid or obscure certain information or aspects of performance will inevitably lead to questions from investors and may create an environment of mistrust.

Data on more difficult subjects should be set out alongside explanations and commentary. Where influenced by unfavourable occurrences or market conditions, a full explanation detailing organisational learning and changes resulting from the experience will reassure investors.

“We are active users of ESG data in our investment process. The quality of data provided by issuers has improved and we would like to see momentum continue and build. ESG data influences how we invest.

We therefore need companies to report on ESG with the same level of diligence, controls and precision as they do for the data provided in their annual report and accounts.”

Trevor Green
Head of UK Equities, Aviva Investors

INVESTMENT GRADE DATA FOR SMALLER ISSUERS

The importance of providing investors with investment grade data applies to smaller issuers too, as the quality of this information informs investment decision-making.

Smaller issuers should aim to follow the seven criteria described in this chapter, taking a pragmatic approach where necessary. For example, ESG data collection systems and processes may be inadequate at first, however, it is better to start reporting and to improve systems over time than not to report at all.
To anyone unfamiliar with ESG reporting, the volume of standards, frameworks and data requirements can seem overwhelming. Even for more experienced issuers, it can be a challenge to identify the indicators and standards which are most relevant to their investors.

While we are some way from a global consensus on reporting standards, the frameworks developed by the following organizations (in no specified order) are the ones most widely cited by investors: the Global Reporting Initiative (GRI), the International Integrated Reporting Council (IIRC), the Sustainability Accounting Standards Board (SASB), the UN Global Compact, the CDP (formerly the Carbon Disclosure Project), the Climate Disclosure Standards Board, and the FSB Task Force on Climate-Related Financial Disclosures.

FTSE Russell has consolidated indicators from different global standards and developed an Exposure framework. This identifies indicator applicability for different types of company based on industrial and geographic presence.
Consistent global frameworks provide an essential tool to allow investors to analyse and compare ESG risks across companies and sectors.

Rod Paris
CIO, Standard Life Investments

Example

Index membership: FTSE MIB
ICB subsector: Utilities

A utility group operating in Europe and Latin America has significant exposure to stakeholders whose support is critical to its license to operate. The company addresses this challenge by clearly identifying and disclosing both the most significant ESG issues and its stakeholder engagement process, and by rigorously organising its sustainability report around the ESG issues thus identified. The company’s progress on its sustainability plan is mapped against the Sustainable Development Goals throughout the report. The report is prepared in compliance with GRI G4 guidelines (“in accordance – core option”), with references to this standard clearly guiding the reader through the various sections. ESG information is externally verified through limited assurance by independent auditors.

The leading global ESG frameworks

CDP (formerly the Carbon Disclosure Project)
CDP collects standardised information from companies on climate change and the use of natural resources such as water and soft commodities.
www.cdp.net

Climate Disclosure Standards Board (CDSB)
The CDSB Framework helps companies explain how environmental matters affect their performance and show how they are addressing associated risks and opportunities to investors in annual or integrated reports.
www.cdsb.net

Global Reporting Initiative (GRI)
GRI Sustainability Reporting Standards are the most widely used standards for reporting on ESG impacts globally, and have been developed over many years through multi-stakeholder contributions. GRI Standards aim to meet the information needs of all stakeholders, and the modular structure supports both comprehensive reports and selected disclosures.
www.globalreporting.org

Integrated reporting
The Integrated Reporting Framework helps companies to produce a concise, investor-focused report that looks at an issuer’s performance and prospects through the lens of six ‘capitals’ (financial, manufactured, human, natural, intellectual, social and relationships).
www.integratedreporting.org

Sustainability Accounting Standards Board (SASB)
SASB issues sustainability accounting standards that help public corporations disclose material and decision-useful information to investors in their mandatory filings, based on their industry, in line with the notion that under existing regulation material information should be disclosed in the Forms 10-K or 20-F.
www.sasb.org

UN Global Compact (UNGC)
The Global Compact requires companies to commit to a set of ten universal principles concerning human rights, labour, environment and anti-corruption.
www.unglobalcompact.org

61% of European sustainability reporters use GRI
New contributions to global standards

Among the frameworks which are likely to define the next decades of global reporting and disclosure are:

— the Sustainable Development Goals (SDGs) specified in the UN’s 2030 Agenda for Sustainable Development; and

— the recommendations of the Financial Stability Board’s Task Force on Climate-related Financial Disclosures.

Although coming from very different directions and starting points, both initiatives could play a significant role in the global harmonisation of ESG measurement to the benefit of both issuers and investors.

The UN Sustainable Development Goals

The 17 Sustainable Development Goals – and 169 associated targets – were adopted by the General Assembly of the United Nations in September 2015 to inform a global action plan on “people, planet and prosperity” through to 2030. The value of the framework that the SDGs set out lies in their universality and bottom-up nature, reflecting the fact that it stems from an agreement reached after a long process of international negotiations and consultations involving governments, businesses and civil society.

The 17 SDGs can provide a useful and internationally recognised framework to shape and prioritise business plans and associated reporting. They are consistent with a number of the leading global ESG reporting frameworks and are reflected in a growing number of ESG assessment frameworks including FTSE Russell’s ESG Ratings Model. Measuring progress against relevant sustainable development goals and targets enables the harmonisation and comparability of sustainability investments and actions on a global scale.

A summary of the SDG framework is presented graphically. For more information, please visit the UN Sustainable Development Knowledge Platform at https://sustainabledevelopment.un.org.

The Financial Stability Board Task Force on Climate-related Financial Disclosures

Background

In December 2016 the Financial Stability Board Task Force on Climate-related Financial Disclosures (TCFD) published its recommendations. This initiative was set up following a request from the G20 in order to avoid potential negative impacts on the stability of financial markets.

The rationale for this was that appropriate disclosures were needed for financial firms to manage and price climate risks and to take lending, investment or insurance underwriting decisions based on their view of low-carbon economy transition scenarios. Effective disclosure of climate-related financial risks will help avoid an abrupt repricing of risk and impacts on market stability.

The task force has developed a set of recommendations for consultation that aim to support consistent, comparable, reliable, clear and efficient climate-related disclosures by financial and non-financial companies.

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The task force’s recommendations very closely align with our Guidance for ESG Reporting although the scope of our guidance is more broadly applicable across all ESG Themes. Whilst the TCFD is focused on material risks and opportunities from climate change and the transition to a green economy many of its principles are applicable to other sustainability themes too.

Recommendations

The task force recommends that climate-related financial disclosures should be made in public financial filings such as annual reports. They believe that since climate change often poses material risks their framework provides a useful basis for complying with legal obligations in many jurisdictions, for listed companies to disclose material risks. To ensure robust information the task force recommends governance controls such as review by Chief Financial Officers and audit committees. The task force recommendations set out ‘Principles for Effective Disclosures’ which closely align with those set out here in Chapter 03, Investment Grade Data.

The more specific disclosures that are recommended fall into four categories: Governance, Strategy, Risk Management and Metrics & Targets. The task force’s high level specific disclosure recommendations are summarised in the table above across all four of these categories. These disclosures above are relevant across all industrial sectors. The task force has also developed much more sector-specific guidance set out for the following industries and groups:

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Financials: Banks, Insurance Companies, Asset Owners, Asset Managers; and

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Non-Financials: Energy, Transportation, Materials and Buildings, and Agriculture, Food and Forest Products.

The task force also places some importance on scenario analysis and has published a technical supplement setting out the use of scenario analysis, related considerations, analytical choices, climate-related scenarios and use of leading public climate scenarios.

LSEG welcomes the TCFD recommendations

London Stock Exchange Group welcomes these recommendations and sees them as an important step in driving improved global consistency in voluntary global reporting standards. Please review the full guidance on www.fsb-tcfd.org.

The recommendations have many implications for our business: for our own reporting as a listed company, for our work with issuers including this Guidance, and for our information services to investors, including benchmarks. LSEG and FTSE Russell, in particular, intend to play a critical role in enabling the flow of information envisaged by the TCFD. FTSE Russell’s Climate Change Criteria (which form part of the ESG Model) in many cases map to the recommended disclosures, and as an immediate step, FTSE Russell is reviewing them closely to identify new indicators and to align existing ones. The TCFD also cover disclosure of opportunities related to green products. This supports FTSE Green Revenues data model and aligns with Chapter 07 of this Guidance. LSEG is also well positioned to support and facilitate the further refinement of metrics through collaboration with issuers and investors, and looks forward to exploring with the TCFD how to support this important work.
How should ESG data be reported?

Companies can report ESG information in their annual report, in a standalone sustainability report or in an integrated report. The choice of reporting formats may involve trade-offs between breadth and depth, between focusing on material issues and covering a wider horizon that addresses the relationship between ESG and business strategy. It is often unclear which of these is most useful to investors.

Issuers can take practical steps to ensure that their ESG disclosures are relevant to their investors. You can ensure that your reported data is of investment-grade quality, set out your views on materiality, and explain the strategic relevance of these ESG issues to your business. There are different advantages to each type of reporting, and each issuer should consider which approach will best suit their own needs and those of their investors. Remember that reporting is just one part of the wider dialogue you have with your investors. You should see ESG reporting, irrespective of the specific format, as providing a basis for dialogue with your investors, not as a replacement for this dialogue.
Annual report, standalone sustainability report, or integrated report?

Annual report
It is increasingly common for larger listed companies to include explicit references to ESG themes within their annual reports. The integration of ESG issues into annual reports allows the process of gathering and verifying this data to be integrated into the processes and information controls that are already in place. It also means that ESG data is readily available to investors at the same time as wider information about the company. In practice, due to concerns about length and complexity, companies tend to discuss relatively few ESG issues in their annual reports. In addition, ESG-related content may not fit the flow and structure of the annual report. These issues can be addressed by publishing methodologies, policies and historical data online, leaving just the key information pertaining to the previous year and to future strategies, plans and targets in the annual report.

Standalone sustainability report
Introducing a standalone sustainability or CSR report is an approach favoured by many issuers. In 2015, 726 non-financial reports were published in the UK and 309 in Italy. Those reports provide a clear ‘home’ for ESG content, consolidating the information in a single location. In addition, a standalone sustainability report does not necessarily need to align with the style of the annual report; issuers can adopt a style of presentation for raw data, tables and charts best suited to ESG information.
The separation can imply that sustainability information is considered separate from the core business of the company. This can be addressed by aligning key areas of the annual report and sustainability report. For example, if a performance trend or external driver is highlighted in the annual report, it should also be addressed in the standalone sustainability report.

Integrated report
The concept of an integrated report is that ESG information and data are presented in an integrated manner within the annual report. This model has been promoted by the International Integrated Reporting Council (IIRC) and aims to offer investors a more detailed and holistic insight into business performance and impact over the short, medium and long term.

Integrating reporters should beware of the implications of reducing the information made available to investors. Although brevity is welcomed by many investors and enables a focus on the most business critical ESG areas, it may mean that investors do not get the breadth of information they need. Investors are diverse and have different ESG needs. Some of them review published reports directly, whereas others access company information (including within analytics, research tools and indexes) through third party data and research providers and index providers. This means that data needs to be easily collectable by these intermediaries—and as a result, integrated reporting should be supplemented by additional, more detailed ESG information delivered via the company’s website or through associated published data appendices.

The Different Forms of ‘Capital’

CAPITAL

Natural: environmental resources, such as air, water and land.

Human: people and their capabilities and experience.

Social and relationship: stakeholder and network relationships, and

Manufactured: for example, buildings, equipment and infrastructure.

Intellectual: knowledge-based intangibles, for example brands and patents.

Financial: internal and external funds available to a business.

The Reporting Council lists six capitals in its framework.

An end to survey fatigue
Publishing well considered reports that provide high quality ESG information and data, and placing other relevant information such as policies online, will make it increasingly feasible for you to point those requesting responses to ESG surveys towards your published materials instead.

Optimising communication
There are a number of steps that you can take to ensure your report is of the greatest possible value to investors:

1. Separate out policies, processes and methodologies
   - Annual or sustainability reports featuring large amounts of detail around policies and methodologies can obscure new information and key messages; and
   - Incorporate standing information (‘boilerplate’) repeated every year in an appendix or separate document, and signpost it from the report.

2. Make it easy to find and access
   - Ensure that the report is prominent. Promote it on the corporate website; including the investor relations section, include a link within news releases to the markets and summarise findings in investor presentations; and
   - Provide data in spreadsheet format, hyperlink to corresponding financial statements, or further ESG information if producing a report online. Data can be tagged in XBRL, so that it can more easily be pulled out and aggregated by specialist applications. XBRL is a type of extensible markup language used for organising and defining financial data in a standardised way, applying tags to unify and compare different accounting standards.

3. Consider language
   - Ensure the language used, and its accessibility, meet the needs of your investor base.

4. Combine data tables and include historical information
   - Retain three to five years’ worth of historical information and data. Where there are significant corporate changes such as acquisitions and de-mergers, the reports and information pertaining to the previous entities should also be retained wherever possible.

Example

Index membership: FTSE Italia Small Cap

An industrial goods and services manufacturer of components for household appliances listed on Borsa Italiana’s premium segment STAR has adopted the IIRC’s reporting format for its annual report, published both in Italian and English. The business strategy is broken down into the forms of capital suggested by the Integrated Reporting Framework. It also adopts GRI standards for materiality analysis and KPI disclosure with three year data series provided for each KPI. The intellectual capital section includes detailed research and development indicators, in line with the emphasis placed on innovation and intangible assets described in the company’s business model. The governance section is also well developed to meet STAR investors’ expectations of a strong sustainability dimension.

Revealing the full picture

Reporting as a complement to dialogue
Reports enable public distribution of ESG information concurrently to all existing and prospective investors. This can complement direct dialogue with investors, and also provide a basis for such dialogue—something which can in turn help shape and determine the content of future reports. In other words, high quality reporting should support deeper and more effective direct dialogue with the investor community, not replace it.
Regulation and investor communication

How can companies navigate regulations and communicate effectively?


The UK’s implementation of the EU Non-Financial Reporting Directive builds on earlier provisions to require companies and groups with over 500 employees that are classed as public interest entities (i.e. entities whose activities are of significant interest to the public, and include banks, insurers and quoted companies) to disclose a full range of non-financial information in their strategic reports. This requires eligible companies to disclose information on environmental, employee, social and human rights. The framework also requires disclosures on anti-corruption and anti-bribery matters. There is a further requirement for quoted companies to include a description of their diversity policy and how it has been implemented or to explain why one is not relevant.

If the company does not have a policy in relation to any of these matters the company should provide a clear and reasoned explanation as to why it would not be relevant. The first reports under the new requirements should be published in 2018, for financial years commencing in 2017. There is flexibility on how to report and companies can draw on relevant international, European or national guidelines.

The Italian transposition of the Directive in addition requires issuers to adopt global standards wherever possible, or to explain why the company decided to develop its own disclosures approach. Disclosure has also to cover a minimum set of parameters, including energy use from renewable and non-renewable sources, impact on health and safety, and measures aimed at implementing international gender diversity frameworks. The non-financial statement can be part of the annual report, or a separate document, and it has to be externally verified either by the company’s legal auditors or by an auditing firm specially appointed.

The statement has to be submitted to the Italian capital markets authority Consob, who is also in charge of monitoring compliance.

Getting value from regulation

Rather than taking a minimum-compliance approach, issuers should use the regulating requirements as an opportunity to enhance their reporting to investors.

It is critical to move beyond the areas covered in regulation and towards identifying your business’s most material ESG themes and the underlying indicators based on global standards. Only then will you be able to produce ESG reporting that aligns closely with your own material issues, and that enables a richer data flow and dialogue with investors to take place.

Going forward, we may see the financial community sharing the responsibility of disclosing alignment with ESG considerations. Article 373 of France’s Energy Transition for Green Growth Law which came into effect in early 2016 requires issuers to outline how they factor ESG criteria into their investment decisions. As this effectively forces ESG engagement and integration from both sides, it adds still more momentum to the drive for consistency, standardisation and recognition of the global context influencing reporting.
Green Revenue reporting

How can issuers get recognition for green products and services?

Around the world, investors want to understand issuers’ exposure to green products and services. However, there is limited consistent information available on how issuers are deriving revenue and growth from providing environmental solutions.

As an issuer, you should proactively communicate your exposure to the green products and services that enable the transition to the green economy. To do this, you need to identify the parts of your business that manufacture or provide goods, products, and services delivering environmental solutions, quantify the associated revenues, and talk about how your investments in innovation and R&D will drive your business’s future growth.
“Certain segments of global markets will undergo significant change as the world moves towards Green Revenues. Companies that offer comprehensive reports on the environmental solutions they provide, send a strong signal to capital markets that they are aware of the business opportunities that come with long term trends like the transition to Green Revenues. Companies disclosing their ‘green revenues’ can benefit through greater investment from funds such as ours.”

Maurice Versavel
Investment Strategist, PGGM

Climate risk and rewards

Investors need to understand how companies in their portfolios are changing their exposure to green revenues subsectors and therefore need issuers to provide more detailed revenue breakdown, at a green sub-segment level, to measure this. Some of the world’s largest investors are actively allocating additional capital to companies with higher green revenue exposure, so better reporting can directly lead to greater investment flows. This requires you as an issuer to:

1. Understand opportunities in the transition to a green economy
   Identify parts of the business that manufacture or provide goods, products and services driving value for the business and delivering environmental solutions.

2. Identify green revenues
   Provide details of the revenues resulting from ‘green’ goods, products and services.

3. Connect to your own climate impacts
   Ensure that reporting on green revenues is integrated with both wider financial reporting and with carbon strategy, emissions data and performance reporting.

4. Talk about where the future lies
   Discuss how investment in innovation and R&D will support the transition to a green economy.

Example

Index membership: FTSE 100
ICB subsector: Speciality Chemicals

A UK chemicals company breaks its revenues into specific sub-segments, enabling investors to understand precisely how much of those revenues make a contribution to the green economy.

For example, it has a segment named ‘Precious Metal Products’, which it breaks down into two sub-segments, ‘Recycling’ (revenue gained from providing recycling services) and ‘Other activities’ (revenue gained from refining and developing paint coats and other products). This allows investors to see that the recycling segment contributes to the green economy, whereas the ‘Other activities’ do not. Each of these sub-segments is furnished with a separate published calculation sheet.

Index membership: FTSE 100
ICB subsector: Fixed Line Telecommunications

A FTSE 100 telecommunications company has reported its aim as being to ‘have helped our customers cut their carbon emissions by at least three times our own end-to-end carbon impact by 2020. This 3:1 ambition is based on the company’s products and services having a carbon abatement effect at least three times the impact of its own emissions (Scope 1, 2 and 3).’

By quantifying and reporting the abatement affects of products such as video-conferencing and cloud computing services, the business demonstrates how it is not only prepared for the transition to the green economy but will benefit directly as a result.

RENEWABLE FUNDS

An emerging asset class associated with the transition to a green economy is represented by renewable infrastructure funds. Renewable infrastructure funds listed on London Stock Exchange are worth a combined £3.4bn and have raised £2.7bn since 2013. For investors to be able to report on the impact of these funds on the exposure of their portfolios to the green economy, clarity and details regarding the type of assets these funds are invested in are extremely useful. These could include the renewable energy generation capacity and the equivalent estimated GHG emissions avoided through the infrastructure projects that are financed or in which the funds are invested.
Investors are increasingly interested in the ESG characteristics of fixed income issuers. They recognise these issues as sources of risk and of opportunity. In addition, with the growth of the green bond market, investors are also interested in financing that is linked to specific activities and projects delivering environmental benefits.

The rest of this Guidance is also applicable at an entity level to issuers of bonds considering their ESG reporting. Issuers may also wish to consider issuing green bonds to access new sources of capital. However, this requires a number of criteria to be satisfied. Issuers need to ensure that proceeds are fully directed towards green projects, that there are clear criteria for project selection and evaluation, that proceeds are only used for green projects, and that information on the use of proceeds is published regularly.

To be included on the London Stock Exchange green bond segment, an issuer also needs to use an external reviewer.

Debt finance

What should debt issuers report and what are the emerging standards here?
82% of the green bond market is investment grade (BBB rated or higher)
Green Bond Principles – what investors need to know

The Green Bond Principles (GBP) define green bonds as any type of bond instrument where the proceeds will be exclusively applied to finance or re-finance in part or in full new and/or existing Green Projects, and which are aligned with the four core components of the GBP.

GBP core components can be summarised as:

1. Use of proceeds – measuring green impact
   Proceeds should be fully directed towards ‘Green Projects’. That is, they will address key areas of environmental concern such as climate change, evolution of natural resource depletion, biodiversity loss and/or pollution.

2. Process for project evaluation and selection
   Issuers should be transparent in how they determine the eligibility of their projects, outlining how they will meet critical environmental sustainability objectives.

3. Management of proceeds
   Issuers should transparently track net proceeds, allocating them in a segregated sub-account, sub-portfolio or otherwise. The Principles recommend auditing as an additional level of robustness.

4. Reporting
   Information on the use of proceeds, including the amounts allocated at project level and the impacts achieved and expected, should be published annually until full allocation and processing thereof.

Climate Bonds Initiative

Climate Bonds Initiative is an investor-focused, not-for-profit organisation whose purpose is to mobilise capital markets for climate change solutions. Its Climate Bond Taxonomy has been one of the first attempts to provide broad guidance for prospective green bond and climate bond issuers and investors by encouraging common definitions across global markets, in a way that supports the growth of a cohesive thematic bond market. Eight specific ‘climate bond’ sectors have been identified for which detailed eligibility criteria have been developed. Sector-specific standards currently exist for solar, wind, low carbon economy buildings, geothermal and low carbon economy transport whilst standards for water, bioenergy and agriculture and forestry are also under development. The Climate Bonds Standard (v2.0), which fully integrates the Green Bond Principles, consists of a certification process, pre- and post-issuance requirements and a set of sector-specific eligibility and guidance documents. Bonds are accorded the status of Certified Climate Bonds when they are verified as adhering to the Climate Bonds Standard, providing investors with assurance about their contribution to the delivery of a green economy.

The certification process is summarised as:
1. Identify qualifying projects and assets, based on the Climate Bond Standards criteria.
2. Arrange an independent review.
3. Track and report, the value of the assets must stay equal to, or greater than, the value of the bond, and reporting to investors must take place each year.

‘Climate-aligned’ bonds

According to the Climate Bonds Initiative’s State of the Market 2016 report, ‘climate-aligned’ bonds have reached a total value of $694bn. These bonds include not just labelled green bonds but those that are financing low-carbon and climate adaptation infrastructure, and are issued by companies with over 95% of revenue derived from climate-aligned assets.

Social bonds

ICMA and the Green Bond Principles have published guidance for issuers aiming to finance projects with social objectives. Focused on populations that are living under the poverty line, excluded, and/or vulnerable, social projects can include providing development infrastructure and services such as sanitation, clean drinking water, affordable transport, education and healthcare as well as affordable housing, employment projects, food security and socioeconomic advancement.

As with green bonds, social bond issuers should apply the four core components of the GBP (use of proceeds, process for project evaluation and selection, management of proceeds, and reporting), and external reviews.
With data on ESG data now frequently being used alongside other financial and strategic information in investment analysis and decision making, there is a compelling case for companies strengthening their reporting and communication by incorporating ESG issues.

Investors want to understand how well companies are managing the risks associated with ESG issues, seeing this as a key test of management quality. They are also interested in the opportunities presented by the green economy — and increasingly, they are allocating capital to companies that are well equipped to benefit from this.

To respond to the growing interest, issuers should provide investment-grade data and information. Specifically, they should:

1. Explain the relevance of environmental, social and governance factors to their business models and strategy. These factors should not be ‘bolt-on’ but an integrated component of business drivers and considerations.
2. Explain how ESG issues may affect their business, e.g., through legislation, reputational damage, employee turnover, licence to operate, legal action or stakeholder relationships, and how these impacts may affect business strategy and financial and operational performance.
3. Explain how they intend to access the new opportunities and revenue streams generated by green and socially beneficial products and services. In this context, they should explain how their investments in innovation and R&D will drive future growth for the business.
4. As the most important part of the above, identify the parts of the business that manufacture or provide goods, products and services delivering environmental solutions and supporting the transition to a green economy, and break down and quantify the associated revenues.
5. Provide data that is accurate, timely, aligned with their fiscal year and business ownership model, and based on consistent global standards to facilitate comparability.
6. Recognise that reporting is just one part of the wider dialogue they have with their investors. ESG reporting, irrespective of the specific format, provides a basis for dialogue with investors but is not a replacement for it.

Beyond its contribution to public policy discussions on driving global standardisation of ESG reporting, LSEG supports issuers and investors in making ESG communication effective.

1. **Capacity building and supporting issuers in reporting:**
   - We provide training, including through our Academy, and host events that clarify good practice in corporate reporting.
   - Through our unique open access technology platform ELITE Connect, we allow listed companies to manage their local and global investor relations efforts and to improve their communications with their shareholders and intermediaries. This platform enables issuers to showcase their company story and ESG activities through digital meetings and webcasting.
   - In 2008 Borsa Italiana established the STAR segment which includes mid-cap companies with high corporate governance standards, and Borsa Italiana regularly organises thematic road shows to facilitate dialogue between listed companies and investors. Sustainability topics are increasingly part of these initiatives.
2. **Profiling issuers on our markets with green or other sustainability attributes:**
   - London Stock Exchange has developed one of the world’s first green bond segments based on strict admission criteria to support the growth of this market segment, and
   - On Borsa Italiana, listed companies can include information on sustainability strategies, targets and performance as an integral part of their company profiles.
3. **Providing investors with ESG data, analytics and indexes:**
   - FTSE Russell has pioneered ESG indexes for over 15 years since the launch of the FTSE4Good Index Series and now provides a comprehensive range of ESG ratings and data.
   - We collect ESG data from public sources and contact over 4,000 companies to check that information with them directly.
   - We track the proportion of companies’ revenues that derives from products and services serving the transition to a green economy through FTSE Green Revenues data model.
   - We support stock exchanges including Madrid, Johannesburg and Malaysia in creating dedicated ESG indexes for their markets.

4. **Contributing to global policy development and dialogue:**
   - We contribute to consultations on ESG reporting. Recent responses have included those regarding the EU Non-Financial Reporting Guidance, the FSB Task Force on Climate-Related Financial Disclosures, the United States Securities and Exchange Commission’s consultation on material disclosures, and the UK Government consultation on the amendments to the Companies Act.
   - We play an active role in a number of global associations including the UN-backed PRI and Sustainable Stock Exchanges initiative, bringing together a wide range of sustainable investment associations.
   - We promote good standards in the UK and set the Italian corporate governance code. In 2006, we published ‘Creative Tension? 25 Years On’, a collection of essays on corporate governance by leading industry figures, and
   - We convene market participants, issuers and investors to improve data, dialogue, and, ultimately, capital flows.
Appendices
Disclosure categories by industry

Financials
- Carbon emissions
- Energy use
- Social & Community investment
- Staff turnover rates
- Share of temporary staff
- Employee training hours
- Political contributions
- Independent directors
- Female directors
- Corruption fines

Utilities
- Volatile Organic Compound emissions
- Environmental fines
- NOx emissions
- VOC emissions
- Water use
- Water recycled
- Social & Community investment
- H&S management
- H&S training
- Last-time incidents
- Staff turnover rates
- Share of temporary staff
- Employee training hours
- Employee fatalities
- Political contributions
- Independent directors
- Female directors
- Corruption fines

Basic Materials
- Carbon emissions
- Energy use
- Hazardous waste
- Non-recycled waste
- Recycled waste
- Environmental fines
- Environmental management

Industrials, Technology & Telecoms
- Carbon emissions
- Energy use
- Social & Community investment
- Staff turnover rates
- Share of temporary staff
- Employee training hours
- Political contributions
- Independent directors
- Female directors
- Corruption fines

Consumer Goods, Customer Services & Healthcare
- Carbon emissions
- Energy use
- Social & Community investment
- Staff turnover rates
- Share of temporary staff
- Employee training hours
- Independent directors
- Female directors

Oil & Gas
- Carbon emissions
- Energy use
- Hazardous waste
- Non-recycled waste
- Recycled waste
- Environmental fines
- Environmental management
- Water use
- Social & Community investment
- H&S management
- H&S training
- Last-time incidents
- Staff turnover rates
- Share of temporary staff
- Employee training hours
- Employee fatalities
- Political contributions
- Independent directors
- Female directors
- Corruption fines

Emission data detailed

Carbon emissions
- Three years of total operational Green House Gas (GHG) emissions data (Scope 1 & 2) typically via CDP (below)
- Scope 1 emissions are direct emissions from company owned or controlled sources. Scope 2 emissions are indirect emissions from the generation of purchased energy. See www.ghgprotocol.org for more information
- Scope 3 emissions should include a breakdown by GHG type with a gross figure for each GHG and the Global warming Potential for that gas
- CDP (formerly the Carbon Disclosure Project) manages one of the most widely used international standards for reporting emissions (www.cdp.net)
- Other global standards include TCFD (Taskforce for Climate-related Financial Disclosure). GRI (Global Reporting Initiative: www.globalreporting.org) section 305-1 & 305-2 and SASB (Sustainability Accounting Standards Board: www.sasb.org) section 110a.1.

Energy use
- Three years of total energy consumption data is disclosed. Typically, this may be via CDP (below)
- A single, combined figure for all fuel sources i.e. electricity, gas, fuel, measured in kilowatt hours (kWh) of energy is preferred
- If fuel sources are separated this should be clear and use comparable units
- Companies should include their data centres in their disclosure
- Key global standards for this include GRI (Global Reporting Initiative: www.globalreporting.org) section 305-2 and SASB (Sustainability Accounting Standards Board: www.sasb.org) section 150a.1

Recycled waste
- Disclosure of three years of non-recycled waste generation (tonnes)
- This is generally waste that is sent to landfill or incinerated
- It is important to differentiate between treated, recycled and non-recycled for this to be considered disclosed
- Normalized data such as non-recycled waste per unit of revenue is acceptable, provided that it can be consolidated to a corporate level
- Providing granular data in addition to a consolidated figure is particularly useful for certain industries
- However, if it is disclosed in multiple different units, e.g. 100 tonnes of scrap, 500 litres of oil, 20 pieces of car body etc, it is vital to highlight the relevance to the production process
- Key global standards for this include GRI (Global Reporting Initiative: www.globalreporting.org) section 305-2 and SASB (Sustainability Accounting Standards Board: www.sasb.org) section 150a.1

Hazardous waste
- Disclosure of three years of hazardous waste generation (tonnes)
- This includes waste that is re-used as it is, as well as waste that goes through a recycling process as if it may have ended up in landfill otherwise. This includes waste recovered, e.g. spread on land, or composted
- It is important to differentiate between waste that is treated, recycled and not recycled in order for this to be considered disclosed, using consistent measurement (tonnes)
- It cannot be considered disclosed if data is inconsistently measured – as this makes it difficult for an investor to consolidate. Similarly, if data is broken down by site/division/operations without an explanation of how much of the business they represent, investors cannot reasonably establish that it represents 100% of operations
- Key global standards for this include GRI (Sustainability Accounting Standards Board: www.sasb.org) section 150a.1 and CDP (Sustainability Accounting Standards Board: www.cdp.net)
Environmental fines
- Total costs of environmental fines and penalties during financial year
- Figures must be specific and complete
- A clear, specific and complete statement that no fines were levied to any part of the business or its subsidiaries is required to give confidence of zero fines, e.g. “There were no public sanctions and/or penalties imposed on the Company and its subsidiaries. Directors or Management by the relevant regulatory bodies during the financial year ended…”
- Responses such as ‘no significant fines’ is considered as non-disclosure, unless clearly linked to a specific disclosure standard such as GRI, which does provide for minimum thresholds for some industries
- Further details can be found from the GRI (Global Reporting Initiative) website: www.globalreporting.org section 307.1

Environmental management
- Percentage of sites covered by recognised environmental management systems such as ISO14001 or EMAS
- An example of this would be: Widget plc has four sites (A1, A2, A3, A4), of these 2 sites (A2, A3) are certified to ISO14001. A1 contributes to 50% of revenues, A2 contributes to 20% revenues, A3 & A4 contributes to 15% each
- ISO 14001 is a systematic framework to manage the immediate and long-term environmental impacts of an organisation’s products, services and processes to help organisations: minimise their environmental footprint, diminish the risk of pollution incidents, provide operational improvements; ensure compliance with relevant environmental legislation; and develop their business in a sustainable manner. See www.iso.org for further information
- EMAS (the EU Eco-Management and Audit Scheme) is a premium management instrument developed by the European Commission for companies and other organisations to evaluate, report, and improve their environmental performance. EMAS is open to every organisation’s products, services and processes to help organisations: minimise their environmental footprint, diminish the risk of pollution incidents, provide operational improvements; ensure compliance with relevant environmental legislation; and develop their business in a sustainable manner. See www.europa.eu/environment/emas/index_en.htm

NOx emissions
- Disclosure of three years of NOx emissions (tonnes)
- Key global standards for this include SASB (Sustainability Accounting Standards Board: www.sasb.org) and GRI (Global Reporting Initiative: www.globalreporting.org) section 305.7
- NB: Under the Global Reporting Initiative (section EN20) NOx emissions are captured with SOx, however to count as disclosed, SOx and NOx figures must be reported separately

SOx emissions
- Disclosure of three years of SOx emissions (tonnes)
- Key global standards for this include SASB (Sustainability Accounting Standards Board: www.sasb.org) and GRI (Global Reporting Initiative: www.globalreporting.org) section 305.7
- NB: Under the Global Reporting Initiative (section EN20) SOx emissions are captured with NOx, however to count as disclosed, SOx and NOx figures must be reported separately

Volatile Organic Compound (VOC) emissions
- Disclosure of three years of volatile organic compounds (VOC) emissions (kilograms)
- VOC’s are compounds such as Benzene
- VOC’s should be disclosed separately rather than consolidated
- Normalized data such as emissions per unit production is acceptable, provided your company only produces one thing (e.g. cars, aircraft, computers, etc)
- Key global standards for this include SASB (Sustainability Accounting Standards Board: www.sasb.org) section 302.1 and GRI (Global Reporting Initiative: www.globalreporting.org) section 305.7

Water use
- Three years of total water use is disclosed in an appropriate, consistently measured unit, including both freshwater and salt water
- Best practice is to disclose water data separated into water withdrawal, water used and water discharged (at same levels of quality)
- Normalized data such as water use per unit of production is acceptable provided your company only produces one thing, e.g. cars, aircraft, computers, etc. otherwise water consumption per unit of revenue can be accepted irrespective of the number of types of products produced – as revenue can be consolidated at a corporate level

Taking it a step further
- This data should be relevant to your business and may be in more relevant units e.g. a water utility company may report in litres/day
- Key global standards for this include SASB (Sustainability Accounting Standards Board: www.sasb.org) section 140a.1, GRI (Global Reporting Initiative: www.globalreporting.org) section 305.1 and CDP: www.cdp.net

Water recycled
- Percentage of water recycled for use within own operations
- This should be a total consolidated percentage figure for the whole organisation
- Key global standards for this include SASB (Sustainability Accounting Standards Board: www.sasb.org) section 140a.1, GRI (Global Reporting Initiative: www.globalreporting.org) section 305.1 and CDP: www.cdp.net

Health and safety management
- Percentage of sites with OHSAS 18001 (or ISO 45001, which is replacing it)
- This is the international standard for occupational health and safety. The goal of the certification is to reduce workplace hazards and boost employee morale. OHSAS 18001 is a framework for an occupational health and safety (OH&S) management system and is a part of the OHSAS 18000 series of standards. Along with OHSAS 18002, it can help organisations to put in place the policies, procedures and controls needed for to achieve the best possible working conditions and workplace health and safety, aligned to internationally recognized best practice
- See www.bsigroup.com and www.iso.org for more information

Share of temporary staff
- The percentage of the workforce that is employed temporarily or on a contract basis
- GRI (Global Reporting Initiative: www.globalreporting.org) section 102-8 provides a consistent global standard for this.

Revealing the full picture
Environmental management
- Normalized data such as water use per unit of revenue can be accepted irrespective of the number of types of products produced – as revenue can be consolidated at a corporate level
- An example of this would be: Widget plc has four sites (A1, A2, A3, A4), of these 2 sites (A2, A3) are certified to ISO14001. A1 contributes to 50% of revenues, A2 contributes to 20% revenues, A3 & A4 contributes to 15% each
- ISO 14001 is a systematic framework to manage the immediate and long-term environmental impacts of an organisation’s products, services and processes to help organisations: minimise their environmental footprint, diminish the risk of pollution incidents, provide operational improvements; ensure compliance with relevant environmental legislation; and develop their business in a sustainable manner. See www.iso.org for further information
- EMAS (the EU Eco-Management and Audit Scheme) is a premium management instrument developed by the European Commission for companies and other organisations to evaluate, report, and improve their environmental performance. EMAS is open to every organisation’s products, services and processes to help organisations: minimise their environmental footprint, diminish the risk of pollution incidents, provide operational improvements; ensure compliance with relevant environmental legislation; and develop their business in a sustainable manner. See www.europa.eu/environment/emas/index_en.htm

Water use
- Three years of total water use is disclosed in an appropriate, consistently measured unit, including both freshwater and salt water
- Best practice is to disclose water data separated into water withdrawal, water used and water discharged (at same levels of quality)
- Normalized data such as water use per unit of production is acceptable provided your company only produces one thing, e.g. cars, aircraft, computers, etc. otherwise water consumption per unit of revenue can be accepted irrespective of the number of types of products produced – as revenue can be consolidated at a corporate level
- Disclosure of three years of NOx emissions (tonnes)
- Key global standards for this include SASB (Sustainability Accounting Standards Board: www.sasb.org) and GRI (Global Reporting Initiative: www.globalreporting.org) section 305.7
- NB: Under the Global Reporting Initiative (section EN20) NOx emissions are captured with SOx, however to count as disclosed, SOx and NOx figures must be reported separately
- Disclosure of three years of SOx emissions (tonnes)
- Key global standards for this include SASB (Sustainability Accounting Standards Board: www.sasb.org) and GRI (Global Reporting Initiative: www.globalreporting.org) section 305.7
- NB: Under the Global Reporting Initiative (section EN20) SOx emissions are captured with NOx, however to count as disclosed, SOx and NOx figures must be reported separately
- Disclosure of three years of volatile organic compounds (VOC) emissions (kilograms)
- VOC’s are compounds such as Benzene
- VOC’s should be disclosed separately rather than consolidated
- Normalized data such as emissions per unit production is acceptable, provided your company only produces one thing (e.g. cars, aircraft, computers, etc)
- Key global standards for this include SASB (Sustainability Accounting Standards Board: www.sasb.org) section 302.1 and GRI (Global Reporting Initiative: www.globalreporting.org) section 305.7
- This should be a total consolidated percentage figure for the whole organisation
- Key global standards for this include SASB (Sustainability Accounting Standards Board: www.sasb.org) section 140a.1, GRI (Global Reporting Initiative: www.globalreporting.org) section 305.1 and CDP: www.cdp.net
- WB: Under the Global Reporting Initiative (section EN20) SOx emissions are captured with NOx, however to count as disclosed, SOx and NOx figures must be reported separately
- Percentage of water recycled for use within own operations
- This should be a total consolidated percentage figure for the whole organisation
- Key global standards for this include SASB (Sustainability Accounting Standards Board: www.sasb.org) section 140a.1, GRI (Global Reporting Initiative: www.globalreporting.org) section 305.1 and CDP: www.cdp.net
- Total amount of corporate or group donations and community investments made to registered not-for-profit organisations
- An aggregated figure for donations across global operations should be provided, including cash donations, in-kind donations and voluntary hours using a consistent monetary value equivalent
- In-kind donations include products and services
- Key global standards for this (GRI (Global Reporting Initiative: www.globalreporting.org) section 403.9 provides a consistent global standard for this.
- Number and percentage of staff trained on health and safety standards within the last year
- Only trainings separate from induction and explicitly cover health and safety aspects should be included
- Health and Safety training is particularly important in sectors where injury rates and fatalities are yearly issues. By disclosing the number and proportion of staff trained annually, companies demonstrate an ongoing commitment to reducing and avoiding this risk
- GRI (Global Reporting Initiative: www.globalreporting.org) sections 403-5, 403-8 provides a consistent global standard for this.
- Lost-time incidents
- Lost-time incident rate (LTI) or Lost-time incident & fatality rate (LTFR), over last three years
- It is important to be clear about the absolute number of accidents and the time lost versus hours worked or a representative volume
- A definition of lost-time can include accidents, injuries and fatalities. Disclosures should be clear how this is being reported
- GRI (Global Reporting Initiative: www.globalreporting.org) section 403-9 provides a consistent global standard for this.
- Full-time staff voluntary turnover rate calculated against the average number of Full Time Employees during the year to create a consistently comparable figure year on year
- The figure should not include retirements and deaths, though these can be reported separately
- The UN PRI (Principles for Responsible Investment: www.unpri.org) and GRI (Global Reporting Initiative: www.globalreporting.org) section 401-1 provides clear reporting guidance.
Employee training hours
- Hours spent on employee development training to enhance knowledge or individual skills.
- This can be total hours as a company, or average hours per employee.
- It should not include training time on company policies (e.g. safety, code of conduct) as it is intended to reflect your company’s investment in developing human capital, particularly through training that expands the knowledge base of employees.
- GRI (Global Reporting Initiative: www.globalreporting.org) section 404-1 provides a consistent global standard for this.

Employee fatalities
- Number of work-related employee fatalities over last three years.
- Include disclosure of zero fatalities, if that was the case.
- Employee fatalities should be captured separately from contractor fatalities and both listed.
- Key global standards for this include SASB (Sustainability Accounting Standards Board: www.sasb.org) section 320.a.1 and GRI (Global Reporting Initiative: www.globalreporting.org) section 403-9.

Political contributions
Disclosure of total amount of political contributions made:
- Donations to Political Action Committees in the US (a way to pool money from companies, etc. to action political advocacy) should also be disclosed.
- Indirect contributions should also be included. This is defined by the Global Reporting Initiative (GRI) as: “Any financial or in-kind support to political parties, their representatives, or candidates for office made through intermediating organizations such as lobbyists or charities or support given to organizations such as think tanks or trade associations linked to or supporting particular political parties or causes
- Clarity is important in statements reflecting no political contributions – for example, stating that the company policy is to make no political contributions and there are no exceptions in this financial year / time period.
- GRI (Global Reporting Initiative: www.globalreporting.org) section 415.1 provides a consistent global standard for this.

Independent directors
- Number and percentage of independent Directors on the board.
- An independent director is defined as one with no conflicts of interest.
- Your company should identify who specifically on the Board is independent according to a recognized corporate governance code from within your own jurisdiction.
- ICGN (International Corporate Governance Network: www.icgn.org) and OECD (Organisation for Economic Co-operation and Development: www.oecd.org) provide advice on disclosure for this.

Female directors
- Number and percentage of women on the board.
- Whilst this may appear to be obvious, companies should be clear who specifically on their Board is female.
- ICGN (International Corporate Governance Network: www.icgn.org) and OECD (Organisation for Economic Co-operation and Development: www.oecd.org) provide advice on disclosure for this.

Fines
Corruption fines
- Disclosure of the individual and total cost of fines, penalties or settlements in relation to corruption.
- Reporting of no fines or incidents should be clear and specific; for example: ‘There were no legal actions, fines or sanctions relating to anti-corruption, anti-bribery, anti-competitive behaviour or anti-trust or monopoly laws or regulations’.
- GRI (Global Reporting Initiative: www.globalreporting.org) section 205-3 and SASB (Sustainability Accounting Standards Board: www.sasb.org) section 510.a.2 provides clear reporting guidance on reporting on corrupt practices.

ESG fines
- Provisions for fines and settlements specified for ESG (Environmental, Social or Governance) issues in audited accounts.
- A separate figure for provisions for ESG-related fines, rather than inclusion in a consolidated figure is required.
- This does not relate to provisions/reserves created for environmental protection.
- The UN PRI (Principles for Responsible Investment: www.unpri.org) and GRI (Global Reporting Initiative: www.globalreporting.org) section 307.1 provides clear reporting guidance on reporting on ESG-related fines.

Appendix ii – FTSE Green Revenues Definitions

## FTSE Green Revenues Classification System

<table>
<thead>
<tr>
<th>Sector EG</th>
<th>Sub Sector</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>ENERGY GENERATION</td>
<td>Bio Fuels (General)</td>
<td>Revenue generating activities related specifically to the operation and supply of power generation facilities that utilize non-fossilized organic material, with the exception of peat.</td>
</tr>
<tr>
<td></td>
<td>Bio Gas</td>
<td>Revenue generating activities related specifically to the operation and supply of power generation facilities that utilize gas generated through the action decomposition of organic matter, typically during landfill processes.</td>
</tr>
<tr>
<td></td>
<td>Bio Mass (General)</td>
<td>Revenue generating activities related specifically to the operation and supply of power generation facilities that utilize crops grown as a fuel source.</td>
</tr>
<tr>
<td></td>
<td>Bio Mass (Waste)</td>
<td>Revenue generating activities related specifically to the operation and supply of electricity from power generation facilities that utilize organic biodegradable waste from the commercial, industrial and municipal waste streams.</td>
</tr>
<tr>
<td></td>
<td>Cogeneration (General)</td>
<td>Revenue generating activities related specifically to the operation and supply of power generation where primary source is biomass-based, and where the waste heat is utilized for large-scale heating and/or cooling purposes.</td>
</tr>
<tr>
<td></td>
<td>Cogeneration (Biomass)</td>
<td>Revenue generating activities related specifically to the operation and supply of power generation where primary source is biomass-based, and where the heat is utilized for large-scale heating and/or cooling purposes.</td>
</tr>
<tr>
<td></td>
<td>Cogeneration (Renewable)</td>
<td>Revenue generating activities related specifically to the operation and supply of power generation where the primary source is natural gas, but where the waste heat is utilized for large-scale heating and/or cooling purposes.</td>
</tr>
<tr>
<td></td>
<td>Cogeneration (Gas)</td>
<td>Revenue generating activities related specifically to the operation and supply of power generation where the primary source is natural gas, but where the waste heat is utilized for large-scale heating and/or cooling purposes.</td>
</tr>
<tr>
<td></td>
<td>Clean Fossil Fuels</td>
<td>Revenue generating activities related specifically to the operation and supply of power generation that utilizes fossilized organic material. Only clean fossil fuels (EG.03.01) are considered green revenues.</td>
</tr>
<tr>
<td></td>
<td>Clean Fossil Fuels</td>
<td>Revenue generating activities related specifically to the operation and supply of power generation that utilizes fossilized organic material, where chimney emissions are zero (or practically so), for instance through Carbon Capture &amp; Storage.</td>
</tr>
<tr>
<td></td>
<td>Geothermal</td>
<td>Activities related specifically to the operation and supply of power generation that utilizes energy produced by the internal heat of the earth, excluding small-scale heat pump systems.</td>
</tr>
<tr>
<td></td>
<td>Hydro</td>
<td>Revenue generating activities related specifically to the operation and supply of power generation that utilizes the energy produced by flowing fresh water.</td>
</tr>
<tr>
<td></td>
<td>Large Hydro</td>
<td>Revenue generating activities related specifically to the operation and supply of power generation that utilizes the energy produced by large hydro systems.</td>
</tr>
<tr>
<td></td>
<td>Small Hydro</td>
<td>Revenue generating activities related specifically to the operation and supply of power generation that utilizes the energy produced by flowing fresh water, where the energy production capacity of the system is greater than 10MW.</td>
</tr>
<tr>
<td></td>
<td>Nuclear</td>
<td>Revenue generating activities related specifically to the operation and supply of power generation that harnesses the energy present within atomic nuclei or their components.</td>
</tr>
<tr>
<td></td>
<td>Ocean &amp; Tidal</td>
<td>Revenue generating activities related specifically to the operation and supply of power generation that harneses the power of ocean tides and or currents.</td>
</tr>
<tr>
<td></td>
<td>Solar</td>
<td>Revenue generating activities related specifically to the operation and supply of power generation that utilizes the energy derived from the excitation of solar radiation, such as solar photovoltaic or solar thermal systems but excluding solar thermal systems.</td>
</tr>
<tr>
<td></td>
<td>Waste to Energy</td>
<td>Revenue generating activities related specifically to the operation and supply of power generation that utilizes the energy derived from the incineration of municipal waste, or from a fuel source derived thereof. Otherwise known as Energy from Waste.</td>
</tr>
<tr>
<td></td>
<td>Wind</td>
<td>Revenue generating activities related specifically to the operation and supply of power generation that harnesses the power of movements or currents in the air.</td>
</tr>
<tr>
<td>Sector EQ</td>
<td>ENERGY EQUIPMENT</td>
<td>Description</td>
</tr>
<tr>
<td>-----------</td>
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<td>-------------</td>
</tr>
<tr>
<td>Sub-Sector</td>
<td>Micro Sector</td>
<td>Description</td>
</tr>
<tr>
<td>Buildings &amp; Property (General)</td>
<td></td>
<td>Revenue generating activities related specifically to the design, development, manufacture or installation of energy management and optimization systems. Activities include energy management solutions, building management systems, energy management software and energy management services.</td>
</tr>
<tr>
<td>Controls (General)</td>
<td></td>
<td>Revenue generating activities related specifically to the development, design, manufacture or installation of control systems for energy management, such as building automation systems and industrial process control systems.</td>
</tr>
<tr>
<td>Energy Management Logistics &amp; Support (General)</td>
<td></td>
<td>Revenue generating activities related specifically to the design, development, manufacture or installation of energy management or efficiency products or services that are directly related to the core processes but do not by themselves lead to increased efficiencies.</td>
</tr>
<tr>
<td>Industrial Processes (General)</td>
<td></td>
<td>Revenue generating activities related specifically to the design, development, manufacture or installation of energy and energy-related products and services for use in industrial applications. These include products and components which improve energy profiles, and products or systems which reduce energy and other resource usage within processes.</td>
</tr>
<tr>
<td>IT Processes (General)</td>
<td></td>
<td>Revenue generating activities related specifically to the design, development, manufacture or installation of energy efficient information technology products and services.</td>
</tr>
<tr>
<td>Cloud Computing (General)</td>
<td></td>
<td>Revenue generating activities related specifically to the design, development, manufacture or installation of cloud computing products and services. These include infrastructure and underlying platforms but not pure software. General data centers are not included.</td>
</tr>
<tr>
<td>Efficient IT (General)</td>
<td></td>
<td>Revenue generating activities related specifically to the design, development, manufacture or installation of highly energy efficient IT equipment and electronics.</td>
</tr>
<tr>
<td>Lighting (General)</td>
<td></td>
<td>Revenue generating activities related specifically to the design, development, manufacture or installation of energy efficient lighting.</td>
</tr>
<tr>
<td>Power Storage (General)</td>
<td></td>
<td>Revenue generating activities related specifically to the design, development, manufacture, installation or operation of products that store energy at a grid or building level.</td>
</tr>
<tr>
<td>Power Storage (Battery)</td>
<td></td>
<td>Revenue generating activities related specifically to the design, development, manufacture, installation or operation of products that store electrical energy at a grid or building level. Also includes lithium-ion and other advanced batteries and their components unless specifically designed for consumer products.</td>
</tr>
<tr>
<td>Power Storage (Pumped Hydro)</td>
<td></td>
<td>Revenue generating activities related specifically to the design, development, manufacture, installation or operation of products and facilities that store potential energy at grid level through the use of water.</td>
</tr>
<tr>
<td>Smart &amp; Efficient Grids (General)</td>
<td></td>
<td>Revenue generating activities related specifically to the design, development, manufacture or installation of equipment and services that enhance the efficiency of operation of the electrical power network. This includes advanced meters, distributed generation, &quot;smart grid&quot; technologies, high efficiency power generation, transmission and distribution technologies.</td>
</tr>
<tr>
<td>Sustainable Property Operator (General)</td>
<td></td>
<td>Revenue generating activities related specifically to the operation of sustainable buildings.</td>
</tr>
<tr>
<td>Bio Fuels (General)</td>
<td></td>
<td>Revenue generating activities related specifically to the development, processing, production and distribution of bio-derived fuels for transport, heat and electrical power generation.</td>
</tr>
<tr>
<td>Bio Fuel (1st &amp; 2nd Generation)</td>
<td></td>
<td>Revenue generating activities related specifically to the development, processing, production and distribution of bio-derived fuels predominantly for transport. These include 1st Generation biofuels from plants, algae, afforestation or waste products.</td>
</tr>
<tr>
<td>Bio Fuel (3rd Generation)</td>
<td></td>
<td>Revenue generating activities related specifically to the development, processing, production and distribution of bio-derived fuels for transport, heat and electrical power generation. These include 3rd Generation biofuels derived from non-food feedstocks such as algae.</td>
</tr>
<tr>
<td>Bio Gas (General)</td>
<td></td>
<td>Revenue generating activities related specifically to the development, processing, production and distribution of bio-derived gas generated through the anaerobic decomposition of organic matter, typically during landfill processes.</td>
</tr>
<tr>
<td>Bio Mass (swill)</td>
<td></td>
<td>Revenue generating activities related specifically to the development, processing, production and distribution of bio-derived fuels typically for heat and/or electrical power generation using crops grown as a fuel source.</td>
</tr>
<tr>
<td>Bio Mass (waste)</td>
<td></td>
<td>Revenue generating activities related specifically to the development, processing, production and distribution of bio-derived fuels typically for heat and/or electrical power generation using organic biogas from the agricultural and other sectors.</td>
</tr>
</tbody>
</table>
### Appendix

#### Sector 12: ENVIRONMENTAL RESOURCES

<table>
<thead>
<tr>
<th>Sub-Sector</th>
<th>Micro Sector</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Advanced &amp; Light Materials</td>
<td>Advanced &amp; Light Materials (General)</td>
<td>Revenue generating activities related specifically to the design, development or manufacture of materials that are explicitly designed with disassembling and repurposing abilities or that biodegrade rapidly at the end of their useful life.</td>
</tr>
<tr>
<td>King Raw Minerals &amp; Metals</td>
<td>King Raw Minerals &amp; Metals (General)</td>
<td>Revenue generating activities related specifically to the mining, processing, handling or owning of raw materials fundamental to the transition to a green economy.</td>
</tr>
<tr>
<td>Lithium</td>
<td>Lithium</td>
<td>Revenue generating activities related specifically to the mining, processing, handling or owning of lithium, a key input into advanced batteries.</td>
</tr>
<tr>
<td>Platinum &amp; Platinum-Group Metals (PGM)</td>
<td>Platinum &amp; Platinum-Group Metals (PGM)</td>
<td>Revenue generating activities related specifically to the mining, processing, handling or owning of the Platinum Group Metals (PGMs), a key input into pollution control systems.</td>
</tr>
<tr>
<td>Rare Earths</td>
<td>Rare Earths</td>
<td>Revenue generating activities related specifically to the mining, processing, handling or owning of Rare Earth Metals, a key input into super-strength magnets for the renewable energy and advanced vehicles industries.</td>
</tr>
<tr>
<td>Silica</td>
<td>Silica</td>
<td>Revenue generating activities related specifically to the mining, processing, handling or owning of silica, a key raw material for the solar photovoltaic industry.</td>
</tr>
<tr>
<td>Uranium</td>
<td>Uranium</td>
<td>Revenue generating activities related specifically to the mining, processing, handling or owning of uranium, a key raw material for the nuclear power industry.</td>
</tr>
</tbody>
</table>

#### Sector 13: ENVIRONMENTAL SUPPORT SERVICE

<table>
<thead>
<tr>
<th>Sub-Sector</th>
<th>Micro Sector</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental Consultancies</td>
<td>Environmental Consultancies (General)</td>
<td>Revenue generating activities related specifically to companies that provide advice and/or support regarding environmental issues and strategies.</td>
</tr>
<tr>
<td>Finance &amp; Investment</td>
<td>Finance &amp; Investment (General)</td>
<td>Revenue generating activities related specifically to tradable environmentally based credits and to investment vehicles that specialize in environmental themes.</td>
</tr>
<tr>
<td>Carbon Credits trading</td>
<td>Carbon Credits trading</td>
<td>Revenue generating activities related specifically to tradable environmentally based credits or certificates, such as BECs, TRCs or carbon credits.</td>
</tr>
<tr>
<td>Sustainable Investment Funds</td>
<td>Sustainable Investment Funds</td>
<td>Revenue generating activities related specifically to investment vehicles that specialize in environmental themes.</td>
</tr>
<tr>
<td>Smart City Design &amp; Engineering</td>
<td>Smart City Design &amp; Engineering (General)</td>
<td>Revenue generating activities related specifically to the design, development, manufacture or installation of products and services that allow cities to use IT and communication technologies to operate at a significantly higher resource efficiency level.</td>
</tr>
</tbody>
</table>

#### Sector 14: FOOD & AGRICULTURE

<table>
<thead>
<tr>
<th>Sub-Sector</th>
<th>Micro Sector</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agriculture</td>
<td>Agriculture (General)</td>
<td>Revenue generating activities specifically designed to improve yield, productivity and sustainability in agriculture, silviculture, aquaculture and food production or distribution, whilst minimizing negative environmental impacts.</td>
</tr>
<tr>
<td>GM Agriculture</td>
<td>GM Agriculture</td>
<td>Revenue generating activities related specifically to the design, development or manufacture of advanced seeds in which the genetic material (DNA) has been altered in a way that occurs naturally by mating and/or natural recombination.</td>
</tr>
<tr>
<td>Machinery</td>
<td>Machinery</td>
<td>Revenue generating activities related specifically to the design, development or manufacture of agricultural machinery that demonstrate exceptionally high levels of operational efficiencies.</td>
</tr>
<tr>
<td>Meat &amp; Dairy Alternatives</td>
<td>Meat &amp; Dairy Alternatives</td>
<td>Revenue generating activities related specifically to the design, development or manufacture of advanced or modern foods that aim to replicate either animal meat or dairy products.</td>
</tr>
<tr>
<td>Non GMO Advanced Seeds</td>
<td>Non GMO Advanced Seeds</td>
<td>Revenue generating activities related specifically to the design, development or manufacture of advanced seeds in which the genetic material (DNA) has been altered in a way that occurs naturally by mating and/or natural recombination.</td>
</tr>
<tr>
<td>Organic &amp; Low-Impact Foods</td>
<td>Organic &amp; Low-Impact Foods</td>
<td>Revenue generating activities related specifically to the foods and distributors of food that meets natural organic standards. Typically, these are those that use natural pesticides and fertilizers, no antibiotics or genetically modified ingredients, and that encourages wildlife.</td>
</tr>
<tr>
<td>Aquaculture</td>
<td>Aquaculture (General)</td>
<td>Revenue generating activities related specifically to the design, development or manufacture of fish farming equipment, or those who operate fish farms.</td>
</tr>
<tr>
<td>Aquaculture (Sustainable)</td>
<td>Aquaculture (Sustainable)</td>
<td>Revenue generating activities related specifically to the design, development or manufacture of fish farming equipment that is designed to significantly reduce the impact the industry has on the environment, or those who operate fish farms where inputs, antibiotic use and transparency levels are maintained as defined by the ASC.</td>
</tr>
<tr>
<td>Land Erosion</td>
<td>Land Erosion (General)</td>
<td>Revenue generating activities related specifically to the design, development, manufacture or installation or application of products or services that reduce the degradation and movement of the upper layer of soil, particularly in areas exposed to natural disasters or those that have eroded related cost quality issues.</td>
</tr>
<tr>
<td>Logistics</td>
<td>Logistics (General)</td>
<td>Revenue generating activities related specifically to the operation of efficient logistics systems and infrastructure in areas of high food wastage in the transportation stage of production.</td>
</tr>
<tr>
<td>Food Safety, Efficient Processing &amp; Sustainable Packaging</td>
<td>Food Safety, Efficient Processing &amp; Sustainable Packaging (General)</td>
<td>Revenue generating activities related specifically to the design, development, manufacture, installation or application of products or services that improve food safety, standard, test or monitor food, or packaging technologies that extend shelf life and reduce waste.</td>
</tr>
<tr>
<td>Food Safety, Efficient Processing &amp; Sustainable Packaging (no single use plastic)</td>
<td>Food Safety, Efficient Processing &amp; Sustainable Packaging (no single use plastic)</td>
<td>Revenue generating activities related specifically to the design, development, manufacture, installation or application of products or services that improve food safety standard, test or monitor food, or packaging technologies that extend shelf life and reduce waste where single-use plastics material is used in the product.</td>
</tr>
<tr>
<td>Sustainable Plantations</td>
<td>Sustainable Plantations (General)</td>
<td>Revenue generating activities related specifically to the cultivation of forests and oil palms to improve international standards and protocols, which maintain or improve the long-term productivity of plantations while enhancing the efficiency of input resources used.</td>
</tr>
<tr>
<td>Sustainable Forestry</td>
<td>Sustainable Forestry</td>
<td>Revenue generating activities related specifically to the cultivation of timber and timber to improve international standards and protocols, which maintain or improve the long-term productivity of plantations while enhancing the efficiency of input resources used.</td>
</tr>
<tr>
<td>Sustainable Palm Oil</td>
<td>Sustainable Palm Oil</td>
<td>Revenue generating activities related specifically to the cultivation of oil palms to improve international standards and protocols, which maintain or improve the long-term productivity of plantations while enhancing the efficiency of input resources used.</td>
</tr>
</tbody>
</table>
### Sector FE: TRANSPORT EQUIPMENT

<table>
<thead>
<tr>
<th>Sub Sector</th>
<th>Micro Sector</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Road Vehicles</td>
<td>Road Vehicles (General)</td>
<td>Revenue generating activities related specifically to the design, development or manufacture of road vehicles and their key components.</td>
</tr>
<tr>
<td>Advanced Vehicle Batteries</td>
<td>Advanced Vehicle Batteries</td>
<td>Revenue generating activities related specifically to the design, development or manufacture of advanced batteries designed for road vehicles.</td>
</tr>
<tr>
<td>Buses and Bicycles</td>
<td>Buses and Bicycles</td>
<td>Revenue generating activities related specifically to the design, development or manufacture of buses and bicycles, and advanced electric components.</td>
</tr>
<tr>
<td>Bus and Coach Operators</td>
<td>Bus and Coach Operators</td>
<td>Revenue generating activities related specifically to the design, development or manufacture of buses, coaches, and public transportation.</td>
</tr>
<tr>
<td>Electric Vehicles and Devices (incl Hydrogen powered)</td>
<td>Electric Vehicles and Devices (incl Hydrogen powered)</td>
<td>Revenue generating activities related specifically to the design, development or manufacture of low-emission vehicles and their key components. These include hydrogen-powered, electric, and hybrid vehicles, but exclude mild hybrids and gas-powered vehicles.</td>
</tr>
<tr>
<td>Energy Use Reduction Devices</td>
<td>Energy Use Reduction Devices</td>
<td>Revenue generating activities related specifically to the design, development or manufacture of road vehicle devices that lead to considerable savings in fuel economy, such as Stop-Start systems.</td>
</tr>
<tr>
<td>Shipping</td>
<td>Shipping (General)</td>
<td>Revenue generating activities related specifically to the design, development or manufacture of advanced ships and components that lead to considerable savings in fuel economy. This does not include shipping operators.</td>
</tr>
</tbody>
</table>

### Sector FS: TRANSPORT SOLUTIONS

<table>
<thead>
<tr>
<th>Sub Sector</th>
<th>Micro Sector</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Railways</td>
<td>Railways Operator (General)</td>
<td>Revenue generating activities related specifically to the operation of rolling stock networks.</td>
</tr>
<tr>
<td>General Railways</td>
<td>General Railways</td>
<td>Revenue generating activities related specifically to the operation of diesel-powered public transportation and railway freight networks (excluding those where the primary goods transported is coal).</td>
</tr>
<tr>
<td>Electric Railways</td>
<td>Electric Railways</td>
<td>Revenue generating activities related specifically to the operation of electrified public transportation and railway freight networks (excluding those where the primary goods transported is coal).</td>
</tr>
<tr>
<td>Road Vehicles</td>
<td>Road Vehicles (General)</td>
<td>Revenue generating activities related specifically to the operation of sustainable road transportation services.</td>
</tr>
<tr>
<td>Bike Sharing</td>
<td>Bike Sharing</td>
<td>Revenue generating activities related specifically to the operation of city cycle hire schemes and other similar ultra-short-term individual transport vehicle schemes.</td>
</tr>
<tr>
<td>Bus and Coach Operators</td>
<td>Bus and Coach Operators</td>
<td>Revenue generating activities related specifically to the operation of bus and coach fleets.</td>
</tr>
<tr>
<td>Car Clubs</td>
<td>Car Clubs</td>
<td>Revenue generating activities related specifically to the operation or management of fleets of self-drive road vehicles (typically in urban or residential locations) which members may rent, usually on an hourly or per-minute basis.</td>
</tr>
<tr>
<td>Ride Hailing</td>
<td>Ride Hailing</td>
<td>Revenue generating activities related specifically to the operation of pre-booked fast taxis, particularly those that offer ride-sharing services.</td>
</tr>
<tr>
<td>Video Conferencing</td>
<td>Video Conferencing (General)</td>
<td>Revenue generating activities related specifically to the design, development, manufacture, and distribution of video-based teleconference facilities designed for business purposes that allow participants to see as well as hear one another.</td>
</tr>
</tbody>
</table>

### Sector WF: WATER INFRASTRUCTURE & TECHNOLOGY

<table>
<thead>
<tr>
<th>Sub Sector</th>
<th>Micro Sector</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Advanced Irrigation Systems &amp; Devices</td>
<td>Advanced Irrigation Systems &amp; Devices (General)</td>
<td>Revenue generating activities related specifically to the design, development, manufacture, installation or operation of equipment that enables water to be applied efficiently in agricultural contexts.</td>
</tr>
<tr>
<td>Desalination</td>
<td>Desalination (General)</td>
<td>Revenue generating activities related specifically to the design, development, manufacture, operational installation or operation of facilities that remove salt from marine and other surface waters for subsequent industrial, agricultural or residential use.</td>
</tr>
<tr>
<td>Flood Control</td>
<td>Flood Control (General)</td>
<td>Revenue generating activities related specifically to the design, development, manufacture, installation or operation of products and services that prevent or reduce the impact of flood waters.</td>
</tr>
<tr>
<td>Meteorological Solutions</td>
<td>Meteorological Solutions (General)</td>
<td>Revenue generating activities related specifically to the design, development, manufacture, installation or operation of products and services that enable accurate weather forecasting and climate predictions.</td>
</tr>
<tr>
<td>Natural Disaster Response</td>
<td>Natural Disaster Response (General)</td>
<td>Revenue generating activities related specifically to the design, development, manufacture, installation or operation of products and services that help reduce the adverse impact on human life and property in the event of a natural disaster.</td>
</tr>
<tr>
<td>Water Infrastructure</td>
<td>Water Infrastructure (General)</td>
<td>Revenue generating activities related specifically to the design, development, manufacture, installation or operation of products and services that enhance water infrastructure systems. This includes specialty pipes, pumps, valves, actuators, hydrotex and meters activities and the development and construction of water infrastructure.</td>
</tr>
<tr>
<td>Water Treatment</td>
<td>Water Treatment (General)</td>
<td>Revenue generating activities related specifically to the design, development, manufacture, installation or operation of technologies or facilities for the separation and purification of water to meet environmental standards. This includes membranes, ultra-violet, desalination, filtration, ion exchange, biological treatment, chemical and environmental treatment.</td>
</tr>
<tr>
<td>Water Treatment Chemicals</td>
<td>Water Treatment Chemicals</td>
<td>Revenue generating activities related specifically to the design, development, manufacture, installation or operation of chemicals produced for the separation and purification of water to meet environmental standards.</td>
</tr>
<tr>
<td>Water Treatment Equipment</td>
<td>Water Treatment Equipment</td>
<td>Revenue generating activities related specifically to the design, development, manufacture, installation or operation of equipment used for the separation and purification of water to meet environmental standards. This does not include any chemical.</td>
</tr>
<tr>
<td>Water Utilities</td>
<td>Water Utilities (General)</td>
<td>Revenue generating activities related specifically to the operation of water treatment and supply infrastructure, providing potable water or wastewater and sewage services.</td>
</tr>
</tbody>
</table>

### Sector WF: WASTE & POLLUTION CONTROL

<table>
<thead>
<tr>
<th>Sub Sector</th>
<th>Micro Sector</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cleaner Power</td>
<td>Cleaner Power (General)</td>
<td>Revenue generating activities related specifically to the generation of electricity by clean burning fuels in areas of chronic air pollution, in particular relating to the powering of industry.</td>
</tr>
<tr>
<td>Decontamination Services &amp; Devices</td>
<td>Decontamination Services &amp; Devices (General)</td>
<td>Revenue generating activities related specifically to the design, development, manufacture, installation or operation of equipment and services for the clean-up of air, soil or water pollution.</td>
</tr>
<tr>
<td>Air Decontamination Services &amp; Devices</td>
<td>Air Decontamination Services &amp; Devices (General)</td>
<td>Revenue generating activities related specifically to the design, development, manufacture, installation or operation of equipment and services for the clean-up of air, soil or water pollution.</td>
</tr>
<tr>
<td>Land &amp; Soil Decontamination Services &amp; Devices</td>
<td>Land &amp; Soil Decontamination Services &amp; Devices (General)</td>
<td>Revenue generating activities related specifically to the design, development, manufacture, installation or operation of equipment and services for the clean-up of land or soil pollution.</td>
</tr>
<tr>
<td>Sea &amp; Water Decontamination Services &amp; Devices</td>
<td>Sea &amp; Water Decontamination Services &amp; Devices (General)</td>
<td>Revenue generating activities related specifically to the design, development, manufacture, installation or operation of equipment and services for the clean-up of sea or water table pollution.</td>
</tr>
<tr>
<td>Environmental Testing &amp; Gas Sensing</td>
<td>Environmental Testing &amp; Gas Sensing (General)</td>
<td>Revenue generating activities related specifically to the design, development, manufacture, installation or operation of equipment and services for environmental analysis, monitoring, modeling, auditing, site evaluation and environmental impact assessments.</td>
</tr>
</tbody>
</table>
**Appendix iii – ESG Investors Overview**

The adoption of ESG approaches in investment is a growing force in global financial flows. Due to the complexity of this market, there have been various attempts to classify investors into categories according to their strategy. These could be grouped according to their capital focus and motivations, from ESG-risk related issues only to environmental and social impact only. In addition, they could be classified depending upon how ESG is implemented. The table below outlines the commonly used categories.

<table>
<thead>
<tr>
<th>ESG-equivalent*</th>
<th>PRI-equivalent**</th>
<th>ISMIA-equivalent*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exclusions</td>
<td>ESG-Negative screening</td>
<td>Negative screening or Exclusions</td>
</tr>
<tr>
<td>Norms-based screening</td>
<td>Norms-based screening</td>
<td>Norms-based screening</td>
</tr>
<tr>
<td>Best-in-Class selection</td>
<td>ESG-Positive screening and Best-in-Class</td>
<td>ESG-Positive screening and Best-in-Class</td>
</tr>
<tr>
<td>Sustainability-themed</td>
<td>Sustainability-themed</td>
<td>Thematic Investment</td>
</tr>
<tr>
<td>ESG-integration</td>
<td>ESG Integration</td>
<td>Integration of ESG issues</td>
</tr>
<tr>
<td>Engagement and voting</td>
<td>Corporate engagement and shareholder action</td>
<td>Engagement (three types)</td>
</tr>
<tr>
<td>Impact investing</td>
<td>Impact / Community investing</td>
<td>–</td>
</tr>
</tbody>
</table>

### Glossary*

**Best-in-Class Investment Selection:** Approach where loading or best-performing investments within a universe; category or class are selected or weighted based on ESG criteria.

**Engagement and Voting on Sustainability Matters:** Engagement activities and active ownership through voting of shares and engagement with companies on ESG matters. This is a long-term process, seeking to influence behaviour or increase disclosure.

**Exclusions:** An approach that excludes specific investments or classes of investment from the investible universe such as companies, sectors or countries.

**Integration of ESG Issues:** The explicit inclusion by asset managers of ESG risks and opportunities in traditional financial analysis and investment decisions based on a systematic process and appropriate research sources. Norms-based screening: Screening of investments according to their compliance with international standards and norms.

**Sustainability-themed Investment:** Investment in themes or assets linked to the development of sustainability. Thematic funds focus on specific or multiple issues related to ESG.
Appendix iv – References

1. UNPRI Annual Report 2016 http://annualreport.unpri.org – Over 300 asset owner members and over 1,500 asset manager members all commit to incorporate ESG issues into investment analysis and decision-making across all assets.
5. The 2013 ‘Insights from PRI Signatories’ report written by Accenture-UNEP in collaboration with PRI states that 30% of CEs believe they are able to accurately quantify the business value of sustainability initiatives – yet just 7% of investors agree.
10. Data from Corporate Register. October 2016. www.corporateregister.com
13. Scope 1 and 2 definitions are from the GHG Protocol (www.ghgprotocol.org) and are only for direct emissions and indirect emissions from purchased electricity and gas.
17. PRI Reporting Framework. 2013 Main Definitions.
18. EFAMA Guidance on RI Information in the KIID & Post Investment Disclosure. 35 February 2012.