

CSR 2021

Company Specific, GRI, SASB, SFDR, TCFD, UN SDGs

Table of Contents

Company Specific

Attracting and Retaining Talent

Indicator - 123 • Qualitative and Quantitative Disclosures Focused on Talent	10
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GRI

GRI 1: Foundation 2021

GRI 1-1.1 • 1.1 Purpose of the GRI Standards	13
GRI 1-1.2 • 1.2 Users	14
GRI 1-1.3 • 1.3 System of GRI Standards	15
GRI 1-1.4 • 1.4 Using the GRI Standards	16
GRI 1-2.1 • 2.1 Impact	19
GRI 1-2.2 • 2.2 Material topics	20
GRI 1-2.3 • 2.3 Due diligence	21
GRI 1-2.4 • 2.4 Stakeholder	22
GRI 1-3.1 • Requirement 1: Apply the reporting principles	23
GRI 1-3.10 • Publish a GRI content index	24
GRI 1-3.11 • Provide a statement of use	25
GRI 1-3.12 • Notify GRI	26
GRI 1-3.2 • Requirement 2: Report the disclosures in GRI 2: General Disclosures 2021	27
GRI 1-3.3 • Requirement 3: Determine material topics	28

GRI 1-3.4 • Requirement 4: Report the disclosures in GRI 3: Material Topics 2021	29
GRI 1-3.5 • Requirement 5: Report disclosures from the GRI Topic Standards for each material topic	30
GRI 1-3.6 • Requirement 6: Provide reasons for omission for disclosures and requirements that the organization cannot comply with	32
GRI 1-3.7 • Requirement 7: Publish a GRI content index	34
GRI 1-3.8 • Requirement 8: Provide a statement of use	35
GRI 1-3.9 • Requirement 9: Notify GRI	36
GRI 1-4.1 • Accuracy	37
GRI 1-4.2 • Balance	38
GRI 1-4.3 • Clarity	39
GRI 1-4.4 • Comparability	40
GRI 1-4.5 • Completeness	41
GRI 1-4.6 • Sustainability context	42
GRI 1-4.7 • Timeliness	43
GRI 1-4.8 • Verifiability	44
GRI 1-5.1 • 5.1 Aligning sustainability reporting with other reporting	45
GRI 1-5.2 • 5.2 Enhancing the credibility of sustainability reporting	46

GRI 2: General Disclosures 2021

GRI 2-9 • Governance structure and composition	48
GRI 2-16 • Communication of critical concerns	51

GRI 302: Energy 2016

GRI 302-1 • Energy consumption within the organization	52

GRI 302-3 • Energy intensity	54

GRI 302-4 • Reduction of energy consumption	57

GRI 302-5 • Reductions in energy requirements of products and services	58

GRI 302-M.A. • GRI 302 Management Approach	59

GRI 303: Water and Effluents 2018

GRI 303-1 • Interactions with water as a shared resource	60

GRI 303-2 • Management of water discharge-related impacts	62

GRI 303-3 • Water withdrawal	63

GRI 303-4 • Water discharge	65

GRI 303-5 • Water consumption	68

GRI 303-M.A. • GRI 303 Management Approach	70

GRI 304: Biodiversity 2016

GRI 304-2 • Significant impacts of activities, products, and services on biodiversity	71

GRI 305: Emissions 2016

GRI 305-1 • Direct (Scope 1) GHG emissions	72

GRI 305-2 • Energy indirect (Scope 2) GHG emissions	74

GRI 305-3 • Other indirect (Scope 3) GHG emissions	76

GRI 305-4 • GHG emissions intensity	79

GRI 305-5 • Reduction of GHG emissions	81

GRI 305-6 • Emissions of ozone-depleting substances (ODS)	83
GRI 305-7 • Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	84
GRI 305-M.A. • GRI 305 Management Approach	85

GRI 405: Diversity and Equal Opportunity 2016

GRI 405-1 • Diversity of governance bodies and employees	86
GRI 405-2 • Ratio of basic salary and remuneration of women to men	88

SASB

Activity Metric

TC-SI-000.A • Licenses and subscriptions	90
TC-SI-000.B • Processing capacity	91
TC-SI-000.C • Data storage	92

Environmental Footprint of Hardware Infrastructure

TC-SI-130a.1 • Energy consumption	93
TC-SI-130a.2 • Water use	95
TC-SI-130a.3 • Integration of environmental considerations into data centers	97

Data Privacy & Freedom of Expression

TC-SI-220a.1 • Behavioral advertising and user privacy policies	98
TC-SI-220a.5 • Countries where products are subjected to oversight or censorship	100

Data Security

TC-SI-230a.1 • Data breaches and details	101
--	-----

TC-SI-230a.2 • Approach to data security risks	103
--	-----

Recruiting & Managing a Global, Diverse & Skilled Workforce

TC-SI-330a.1 • Employees that are foreign nationals and/or offshore	105
---	-----

SFDR

Greenhouse gas emissions

SFDR.1 • GHG emissions	107
------------------------	-----

SFDR.2 • Carbon footprint	108
---------------------------	-----

SFDR.3 • GHG intensity of investee companies	109
--	-----

SFDR.4 • Exposure to companies active in the fossil fuel sector	110
---	-----

TCFD

Governance

TCFD.Gov.RDa • Board's role in managing risks and opportunities	112
---	-----

TCFD.Gov.RDb • Management's role in managing risks and opportunities	113
--	-----

Strategy

TCFD.Str.RDa • Identified risks and opportunities	114
---	-----

TCFD.Str.RDb • Risk and opportunity impact description	115
--	-----

TCFD.Str.RDc • Resilience of the organization across climate-related scenarios	117
--	-----

Risk Management

TCFD.RM.RDa • Process for risk and opportunity identification	119
TCFD.RM.RDb • Process for climate-related risk management	121
TCFD.RM.RDc • Organizational integration of climate-related risk processes	122

Metrics and Targets

TCFD.MT.RDa • Metrics used for assessment of climate-related risks and opportunities	123
TCFD.MT.RDb • Scope 1, 2 and 3 greenhouse gas emissions and related risks	125
TCFD.MT.RDc • Targets used to manage risks and opportunities	127

UN SDGs

Zero Hunger

SDG2.1 • Ending hunger and the provision of safe, nutritious and sufficient food.	129
---	-----

Good Health and Well-Being

SDG3.1 • Reduction of global maternal mortality ratio.	130
SDG3.c • Increasing financing for healthcare	131

Quality Education

SDG4.7 • Skills and knowledge for sustainable development	132
---	-----

Clean Water and Sanitation

SDG6.1 • Access to safe and affordable drinking water	133
---	-----

Climate Action

SDG13.2 • Integration of climate change into policies, strategies and planning.	134
---	-----

Life on Land

SDG15.a • Financing conservation and biodiversity and ecosystem protection	135

SDG15.b • Financing resources for sustainable forest management globally	136

Company Specific

Attracting and Retaining Talent

Qualitative and Quantitative Disclosures Focused on Talent

Question Code	Indicator - 123	Status	 Complete
Topic	Attracting and Retaining Talent	Assignee	Joseph Magee-Billson
Category	Human Capital (employment, training & diveristy)	Reviewer	Steve Foster

Question

Please provide a qualitative write up on the organizations efforts to attract and retain talent for the applicable reporting year.

Details

Focus areas for providing qualitative responses to this question could include the following:

- Early Talent
- Leadership Development Program (LDP)
- Wealth Management Generalist Program:
- Chartered Professional Accountant (CPA) Pre-Approved Program:
- Amplify® Program
- Analyst Program
- Indigenous Peoples Development Program
- Indigenous Student Internship Program
- Career Launch® Program
- Explore
- Digital Talent

Methodology

Here are the steps taken to answer this question:

1. The response from the previous reporting period was copied using the Envizi copy feature
2. Updated the response based on actions taken in the reporting period. The value of \$10,000 was updated to \$5,000 as can be seen in the audit history.
3. The Employee Performance Report was downloaded and reviewed by Cameron
4. The question was updated to complete.

Final response

In an increasingly competitive talent market, it's important for RBC and our culture to stand out in meaningful ways to current and future employees. This begins with the recruiting and hiring process, and in 2021 we leveraged technology to improve the experience for both hiring managers and candidates. With virtual workplaces creating more options for candidates than ever before, our recruitment programs and campaigns showcased our unique culture and the compelling career opportunities at RBC to attract a diverse talent pool that reflects the communities we serve.

Leaders play a critical role in inspiring and retaining our talented employees around the world. With a focus on enhancing key leadership skills, RBC enabled people managers through targeted learning pathways, new peer-to-peer networks and renewed employee listening initiatives. A robust people manager community will be especially important as we continue to design and navigate both virtual and hybrid workplaces.

To recognize extra efforts throughout the pandemic and support mental well-being during challenging times, RBC provided every employee with a subscription to Headspace, a mindfulness and meditation app, and an additional day off to focus on wellness. We enhanced our support in other ways, including an increase from \$3,000 to \$5,000 in psychology benefits in Canada and a new program, Together, we're perfectly human, which provided additional resources and helped to reduce stigma through executives and employees sharing personal stories of their mental health journeys.

GRI

GRI 1: Foundation 2021

1.1 Purpose of the GRI Standards

Question Code	GRI 1-1.1	Status	In Progress
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

Through their activities and business relationships, organizations can have an effect on the economy, environment, and people, and in turn make negative or positive contributions to sustainable development. Sustainable development refers to 'development which meets the needs of the present without compromising the ability of future generations to meet their own needs' [8]. The objective of sustainability reporting using the GRI Sustainability Reporting Standards (GRI Standards) is to provide transparency on how an organization contributes or aims to contribute to sustainable development.

The GRI Standards enable an organization to publicly disclose its most significant impacts on the economy, environment, and people, including impacts on their human rights and how the organization manages these impacts. This enhances transparency on the organization's impacts and increases organizational accountability.

The Standards contain disclosures that allow an organization to report information about its impacts consistently and credibly. This enhances the global comparability and quality of reported information on these impacts, which supports information users in making informed assessments and decisions about the organization's impacts and contribution to sustainable development.

The GRI Standards are based on expectations for responsible business conduct set out in authoritative intergovernmental instruments, such as the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises [3] and the United Nations (UN) Guiding Principles on Business and Human Rights [5] (see the Bibliographies of the GRI Standards for a list of authoritative instruments used in developing the GRI Standards). Information reported using the GRI Standards can help users assess whether an organization meets the expectations set out in these instruments. It is important to note that the GRI Standards do not set allocations, thresholds, goals, targets, or any other benchmarks for good or bad performance.

Details

Final response

Test answer


1.2 Users

Question Code	GRI 1-1.2	Status	<div><div></div>In Progress</div>
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

Any organization can use the GRI Standards – regardless of size, type, geographic location, or reporting experience – to report information about its impacts on the economy, environment, and people, including impacts on their human rights. The reported information can be used by the organization in its decision-making, for example, when setting goals and targets, or when assessing and implementing its policies and practices. Stakeholders and other information users can use the GRI Standards to understand what organizations are expected to report about. Stakeholders can also use an organization's reported information to assess how they are affected or how they could be affected by the organization's activities. Investors, in particular, can use the reported information to assess an organization's impacts and how it integrates sustainable development in its business strategy and model. They can also use this information to identify financial risks and opportunities related to the organization's impacts and to assess its long-term success. Users other than the organization's stakeholders, such as academics and analysts, can also use the reported information for purposes such as research or benchmarking. The term 'information users' in the GRI Standards refers to all these diverse users of the organization's reported information.

1.3 System of GRI Standards

Question Code	GRI 1-1.3	Status	 To Do
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

The GRI Standards are structured as a system of interrelated standards that are organized into three series: GRI Universal Standards, GRI Sector Standards, and GRI Topic Standards (see Figure 1 in this Standard). The Universal Standards are used by all organizations when reporting in accordance with the GRI Standards. Organizations use the Sector Standards according to the sectors in which they operate, and the Topic Standards according to their list of material topics.

Universal Standards: GRI 1, GRI 2 and GRI 3

An organization begins by consulting GRI 1: Foundation 2021. GRI 1 introduces the purpose and system of GRI Standards and explains key concepts for sustainability reporting. It also specifies the requirements and reporting principles that the organization must comply with to report in accordance with the GRI Standards.

GRI 2: General Disclosures 2021 contains disclosures that the organization uses to provide information about its reporting practices and other organizational details, such as its activities, governance, and policies. This information gives insight into the profile and scale of the organization and provides a context for understanding the organization's impacts.

GRI 3: Material Topics 2021 provides step-by-step guidance on how to determine material topics. GRI 3 also contains disclosures that the organization uses to report information about its process of determining material topics, its list of material topics, and how it manages each topic.

Sector Standards

The Sector Standards provide information for organizations about their likely material topics. The organization uses the Sector Standards that apply to its sectors when determining its material topics, and when determining what information to report for the material topics.

Topic Standards

The Topic Standards contain disclosures for the organization to report information about its impacts in relation to particular topics. The Topic Standards cover a wide range of topics. The organization uses the Topic Standards according to the list of material topics it has determined using GRI 3.

1.4 Using the GRI Standards

Question Code	GRI 1-1.4	Status	To Do
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

All disclosures in the GRI Standards contain requirements. The requirements list information that an organization must report or provide instructions that the organization must comply with to report in accordance with the GRI Standards.

If the organization cannot comply with a disclosure or with a requirement in a disclosure for which reasons for omission are permitted (e.g., because the required information is confidential or subject to legal prohibitions), then the organization is required to specify the disclosure or the requirement it cannot comply with, and provide a reason for omission with an explanation in the GRI content index. See Requirement 6 in this Standard for more information on reasons for omission.

If the organization cannot report the required information about an item specified in a disclosure because the item (e.g., committee, policy, practice, process) does not exist, it can comply with the requirement by reporting this to be the case. The organization can explain the reasons for not having this item or describe any plans to develop it. The disclosure does not require the organization to implement the item (e.g., developing a policy), but it is required to report that the item does not exist.

Requirements, guidance and defined terms

The following apply throughout the GRI Standards:

Requirements are presented in bold font and indicated by the word 'shall'. An organization must comply with requirements to report in accordance with the GRI Standards.

Requirements may be accompanied by guidance.

Guidance includes background information, explanations, and examples to help the organization better understand the requirements. The organization is not required to comply with guidance.

The Standards may also include recommendations. These are cases where a particular course of action is encouraged but not required.

The word 'should' indicates a recommendation, and the word 'can' indicates a possibility or option.

Defined terms are underlined in the text of the GRI Standards and linked to their definitions in the Glossary. The organization is required to apply the definitions in the Glossary.

Reporting format

In the GRI Standards, the term 'sustainability reporting' refers to the process of reporting, which starts with an organization determining its material topics based on its most significant impacts and results in the organization publicly reporting information about these impacts.

The organization can publish or make information accessible in a range of formats (e.g., electronic, paper-based) across one or more locations (e.g., a standalone sustainability report, web pages, an annual report). The terms 'report' and 'reported information' in the GRI Standards both refer to information reported across all locations.

The GRI content index provides an overview of the organization's reported information and shows the location where information users can find it. The content index also shows which GRI Standards and disclosures the organization has used.

If the organization intends to publish a standalone sustainability report, it does not need to repeat information that it has already reported publicly elsewhere, such as on web pages or in its annual report. In such a case, the organization can report a required disclosure by providing a reference in the GRI content index as to where this information can be found (e.g., by providing a link to the web page or citing the page in the annual report where the information has been published).

Effective date


All GRI Standards have an effective date. This is the date from when the information published by an organization must make use of a particular GRI Standard. All information published after the effective date of a Standard must make use of that Standard.

For example, GRI 1: Foundation 2021 has an effective date of 1 January 2023. This means that the organization must make use of GRI 1 for the information it publishes on or after 1 January 2023.

Effective dates are set keeping in mind that organizations may need time to adopt a new or revised Standard.

Adoption of a Standard before its effective date is encouraged, as this allows the organization to report according to best practice.

2.1 Impact

Question Code	GRI 1-2.1	Status	 To Do
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

In the GRI Standards, impact refers to the effect an organization has or could have on the economy, environment, and people, including effects on their human rights, as a result of the organization's activities or business relationships.

The impacts can be actual or potential, negative or positive, short-term or long-term, intended or unintended, and reversible or irreversible. These impacts indicate the organization's contribution, negative or positive, to sustainable development.

The organization's impacts on the economy refer to the impacts on economic systems at local, national, and global levels. An organization can have an impact on the economy through, for example, its competition practices, its procurement practices, and its taxes and payments to governments.

The organization's impacts on the environment refer to the impacts on living organisms and non-living elements, including air, land, water, and ecosystems. An organization can have an impact on the environment through, for example, its use of energy, land, water, and other natural resources.

The organization's impacts on people refer to the impacts on individuals and groups, such as communities, vulnerable groups, or society. This includes the impacts the organization has on people's human rights. An organization can have an impact on people through, for example, its employment practices (e.g., the wages it pays to employees), its supply chain (e.g., the working conditions of workers of suppliers), and its products and services (e.g., their safety or accessibility). Individuals or groups that have interests that are affected or could be affected by the organization's activities are referred to as stakeholders (see section 2.4 in this Standard for more information).

The impacts on the economy, environment, and people are interrelated. For example, an organization's impacts on the economy and environment can result in impacts on people and their human rights. Similarly, an organization's positive impacts can result in negative impacts and vice versa. For example, an organization's positive impacts on the environment can lead to negative impacts on people and their human rights.

2.2 Material topics

Question Code	GRI 1-2.2	Status	To Do
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

An organization may identify many impacts on which to report. When using the GRI Standards, the organization prioritizes reporting on those topics that represent its most significant impacts on the economy, environment, and people, including impacts on their human rights. In the GRI Standards, these are the organization's material topics. Examples of material topics are anti-corruption, occupational health and safety, or water and effluents. A topic need not be limited to impacts on the economy, the environment, or people; it can cover impacts across all three dimensions. For example, an organization might determine that 'water and effluents' is a material topic based on the impacts its water use has on ecosystems and local communities' access to water. The GRI Standards group impacts into topics, like 'water and effluents', to help organizations report cohesively about multiple impacts that relate to the same topic.

The process of determining material topics is informed by the organization's ongoing identification and assessment of impacts. The ongoing identification and assessment of impacts involves engaging with relevant stakeholders and experts and it is conducted independently of the sustainability reporting process. See section 1 in GRI 3: Material Topics 2021 for more information on determining material topics.

Box 1. Sustainability reporting and financial and value creation reporting

The GRI Standards enable organizations to report information about the most significant impacts of their activities and business relationships on the economy, environment, and people, including impacts on their human rights. Such impacts are of primary importance to sustainable development and to organizations' stakeholders, and they are the focus of sustainability reporting. The impacts of an organization's activities and business relationships on the economy, environment, and people can have negative and positive consequences for the organization itself. These consequences can be operational or reputational, and therefore in many cases financial. For example, an organization's high use of non-renewable energy contributes to climate change and could, at the same time, result in increased operating costs for the organization due to legislation that seeks to shift energy use toward renewable sources.

Even if not financially material at the time of reporting, most, if not all, of the impacts of an organization's activities and business relationships on the economy, environment, and people will eventually become financially material issues. Therefore, the impacts are also important for those interested in the organization's financial performance and long-term success. Understanding these impacts is a necessary first step in determining related financially material issues for the organization. Sustainability reporting is therefore crucial for financial and value creation reporting. Information made available through sustainability reporting provides input for identifying financial risks and opportunities related to the organization's impacts and for financial valuation. This, in turn, helps to make financial materiality judgments about what to recognize in financial statements.

While the impacts of the organization's activities and business relationships on the economy, environment, and people may become financially material, sustainability reporting is also highly relevant in its own right as a public interest activity. Sustainability reporting is independent of the consideration of financial implications. It is therefore important for the organization to report on all the material topics that it has determined using the GRI Standards. These material topics cannot be deprioritized on the basis of not being considered financially material by the organization.

2.3 Due diligence

Question Code	GRI 1-2.3	Status	To Do
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster


Question

In the GRI Standards, due diligence refers to the process through which an organization identifies, prevents, mitigates, and accounts for how it addresses its actual and potential negative impacts on the economy, environment, and people, including impacts on their human rights. The organization should address potential negative impacts through prevention or mitigation. It should address actual negative impacts through remediation in cases where the organization identifies it has caused or contributed to those impacts.

The way the organization is involved with negative impacts (i.e., whether it causes or contributes to the impacts, or whether the impacts are directly linked by its business relationships) determines how the organization should address the impacts. It also determines whether the organization has a responsibility to provide for or cooperate in the remediation of the impacts. The organization should:

- avoid causing or contributing to negative impacts through its own activities, and address such impacts when they occur by providing for or cooperating in their remediation through legitimate processes;
 - in the case of negative impacts that are directly linked to the organization's operations, products, or services by its business relationships, seek to prevent or mitigate these impacts even if it has not contributed to them. The organization is not responsible for providing for or cooperating in the remediation of these impacts, but it can play a role in doing so. If it is not feasible to address all identified impacts on the economy, environment, and people at once, the organization should prioritize the order in which to address potential negative impacts based on their severity and likelihood. In the case of potential negative human rights impacts, the severity of the impact takes precedence over its likelihood. See section 1 in GRI 3: Material Topics 2021 for more information.
- Due diligence is elaborated by the United Nations (UN) Guiding Principles on Business and Human Rights [5], the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises [3], and the OECD Due Diligence ##### Guidance for Responsible Business Conduct [2].

2.4 Stakeholder

Question Code	GRI 1-2.4	Status	 To Do
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

Stakeholders are individuals or groups that have interests that are affected or could be affected by an organization's activities. Common categories of stakeholders for organizations are business partners, civil society organizations, consumers, customers, employees and other workers, governments, local communities, non-governmental organizations, shareholders and other investors, suppliers, trade unions, and vulnerable groups.

In the GRI Standards, an interest (or 'stake') is something of value to an individual or group, which can be affected by the activities of an organization. Stakeholders can have more than one interest. Not all interests are of equal importance and they do not all need to be treated equally. Human rights have a particular status as an entitlement of all people under international law. The most acute impacts the organization can have on people are those that

negatively affect their human rights. The term 'rightsholders' refers to stakeholders whose individual human rights or collective rights (held by groups such as indigenous peoples) are or could be affected. Stakeholder interests can be negatively or positively affected by the organization's activities. Due diligence focuses on identifying stakeholder interests that are or could be negatively affected by the organization's activities. Stakeholders may not always have a direct relationship with the organization. For example, the workers in the organization's supply chain can also be its stakeholders, or there can be individuals or groups living at a distance from the organization's operations who can be affected or potentially affected by these operations. They may not be aware that they are stakeholders of that particular organization, especially if they have not yet been affected by its

activities. The organization should identify the interests of these and other stakeholders who are unable to articulate their views (e.g., future generations).

Engaging with stakeholders helps the organization identify and manage its negative and positive impacts. Not all stakeholders will be affected by all activities of the organization. The organization should identify the stakeholders whose interests have to be taken into account in connection with a specific activity (i.e., 'relevant stakeholders').

Where it is impossible to engage with all relevant stakeholders directly, the organization can engage with credible stakeholder representatives or proxy organizations (e.g., non-governmental organizations, trade unions). In addition to engaging with stakeholders, the organization can consult with experts in specific issues or contexts (e.g., academics, non-governmental organizations) for advice on identifying and managing its impacts.

Sometimes it is necessary to distinguish between stakeholders whose interests have been affected (i.e., 'affected stakeholders'), and those whose interests have not yet been affected but could potentially be affected (i.e., 'potentially affected stakeholders').

This distinction is important in due diligence. For example, if an organization's activity leads to a safety hazard, workers who are injured because of the hazard are affected stakeholders, and workers who have not yet been injured but who are exposed to the hazard and could be injured are potentially affected stakeholders. The distinction between affected and potentially affected stakeholders helps identify which workers should receive remedy.

See reference [2] in the Bibliography.


Requirement 1: Apply the reporting principles

Question Code	GRI 1-3.1	Status	<div><div></div>To Do</div>
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

1. The organization shall apply all the reporting principles specified in section 4 of GRI 1: Foundation 2021.

Publish a GRI content index

Question Code	GRI 1-3.10	Status	 To Do
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

The organization shall:

1. publish a GRI content index that includes:
 2. the title: GRI content index;
 1. the statement of use;
 2. the title of GRI 1 used;
3. a list of the reported disclosures from the GRI Standards, including the disclosure titles;
4. the titles of the GRI Standards that the reported disclosures come from;
5. the location where the information reported for each disclosure can be found;
1. if it publishes a standalone sustainability report and the GRI content index is not included in the report itself, provide a link or reference to the GRI content index in the report.

Details

The information reported using the GRI Standards can be published or made accessible in a range of formats (e.g., electronic, paper-based) across one or more locations (e.g., a standalone sustainability report, web pages, an annual report). The GRI content index provides an overview of the organization's reported information, shows where the reported information can be found, and helps information users access this information. The content index also shows which GRI Standards and disclosures the organization has used.

Appendix 2 of this Standard provides guidance on how to prepare the GRI content index when reporting with reference to the GRI Standards. It includes an example that the organization can use to prepare the content index. The organization can use a different format for the content index than the one provided in Appendix 2, as long as it complies with the requirements for the content index. The organization can also use the content index specified for reporting in accordance with the GRI Standards in Appendix 1 of this Standard, if suitable. In such a case, the statement of use in Appendix 1, which is for reporting in accordance with the GRI Standards, must be replaced by the statement of use for reporting with reference to the GRI Standards.

Provide a statement of use

Question Code	GRI 1-3.11	Status	<div><div></div>To Do</div>
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

1. The organization shall include the following statement in its GRI content index:
[Name of organization] has reported the information cited in this GRI content index for the period [reporting period start and end dates] with reference to the GRI Standards.

Details

To state that the organization has reported with reference to the GRI Standards, the organization must have complied with all three requirements in this section.

The organization is required to insert the name of the organization and the start and end dates of its reporting period in the statement, for example: 'ABC Limited has reported the information cited in this GRI content index for the period from 1 January 2022 to 31 December 2022 with reference to the GRI Standards.'

Notify GRI

Question Code	GRI 1-3.12	Status	<div><div></div>To Do</div>
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

1. The organization shall notify GRI of the use of the GRI Standards and the statement of use by sending an email to reportregistration@globalreporting.org.

Details

The organization should include the following information in the email:

- The legal name of the organization.
 - The link to the GRI content index.
 - The link to the report, if publishing a standalone sustainability report.
 - The statement of use.
 - A contact person in the organization and their contact details.
- There is no cost associated with notifying GRI of the use of the GRI Standards.

Requirement 2: Report the disclosures in GRI 2: General Disclosures 2021

Question Code	GRI 1-3.2	Status	<div><div></div>To Do</div>
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

1. The organization shall report all disclosures in GRI 2: General Disclosures 2021.

Details

Reasons for omission are permitted for all disclosures in GRI 2 except for:

- Disclosure 2-1 Organizational details
 - Disclosure 2-2 Entities included in the organization's sustainability reporting
 - Disclosure 2-3 Reporting period, frequency and contact point
 - Disclosure 2-4 Restatements of information
 - Disclosure 2-5 External assurance
- If the organization cannot comply with a disclosure or with a requirement in a disclosure for which reasons for omission are permitted, then the organization is required to specify in the GRI content index the disclosure or the requirement it cannot comply with, and provide a reason for omission with an explanation. See Requirement 6 in this Standard for more information on reasons for omission.

Requirement 3: Determine material topics

Question Code	GRI 1-3.3	Status	<div><div></div>To Do</div>
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

The organization shall:

1. determine its material topics;
2. review the GRI Sector Standard(s) that apply to its sector(s) and:
3. determine whether each topic in the applicable Sector Standard(s) is a material topic for the organization;
1. list in the GRI content index any topics from the applicable Sector Standard(s) that the organization has determined as not material and explain why they are not material.

Details

See section 1 in GRI 3: Material Topics 2021 for guidance on how to determine material topics. The organization is required to determine its material topics based on its specific circumstances. Using the GRI Sector Standards supports the organization in this process. The Sector Standards provide information for organizations about their likely material topics. The organization is required to use the applicable Sector Standards when determining its material topics.

Guidance to 3-b

The organization is required to comply with Requirement 3-b only if GRI Sector Standards that apply to its sectors are available. The organization is required to review each topic described in the applicable Sector Standards and determine whether it is a material topic for the organization. If the organization has determined any of the topics included in the applicable Sector Standards as not material, then the organization is required to list them in the GRI content index and explain why they are not material. See Requirement 7 in this Standard for more information on the content index. See section 1 in GRI 3 and the GRI Sector Standards for guidance on how to use the Sector Standards to determine material topics.

Requirement 4: Report the disclosures in GRI 3: Material Topics 2021

Question Code	GRI 1-3.4	Status	<div><div></div>To Do</div>
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

The organization shall:

1. report its process of determining material topics using Disclosure 3-1;
2. report a list of its material topics using Disclosure 3-2;
3. report how it manages each material topic using Disclosure 3-3.

Details

Reasons for omission are only permitted for Disclosure 3-3 Management of material topics in GRI 3. If the organization cannot comply with Disclosure 3-3 or with a requirement in Disclosure 3-3, then the organization is required to specify this in the GRI content index, and to provide a reason for omission with an explanation. See Requirement 6 in this Standard for more information on reasons for omission.

Requirement 5: Report disclosures from the GRI Topic Standards for each material topic

Question Code	GRI 1-3.5	Status	To Do
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

The organization shall:

1. report disclosures from the GRI Topic Standards for each material topic;
2. for each material topic covered in the applicable GRI Sector Standard(s), either:
3. report the disclosures from the GRI Topic Standards listed for that topic in the Sector Standard(s), or;
1. provide the 'not applicable' reason for omission and the required explanation in the GRI content index.

Details

Guidance to 5-a

For each material topic, the organization needs to identify disclosures from the GRI Topic Standards to report. The organization is required to report only those disclosures relevant to its impacts in relation to a material topic. The organization is not required to report disclosures that are not relevant.

There is no requirement for a minimum number of disclosures to report from the Topic Standards. The number of disclosures that the organization reports is based on its assessment of which disclosures are relevant to its impacts in relation to a material topic.

The organization may need to use more than one Topic Standard to report on a material topic. In addition, not all disclosures in a Topic Standard may be relevant for the organization to report. For example, an organization identifies pay equality as a material topic. The organization determines that the following disclosures are relevant to report on the topic: Disclosure 202-1 Ratios of standard entry level wage by gender compared to local minimum wage in GRI 202: Market Presence 2016, and Disclosure 405-2 Ratio of basic salary and remuneration of women to men in GRI 405: Diversity and Equal Opportunity 2016. The organization is not required to report other disclosures from these Standards (e.g., Disclosure 202-2 Proportion of senior management hired from the local community in GRI 202), as

these disclosures do not address the topic of pay equality. When a material topic is covered in the applicable GRI Sector Standards, the organization uses the Sector Standards to identify disclosures to report. See Requirement 5-b in this Standard for more information.

Reasons for omission are permitted for all disclosures from the Topic Standards. If the organization cannot comply with a disclosure or with a requirement in a disclosure, then the organization is required to specify in the GRI content index the disclosure or the requirement it cannot comply with, and provide a reason for omission with an explanation.

See Requirement 6 in this Standard for more information on reasons for omission.

The organization should provide sufficient information about its impacts in relation to each material topic so that information users can make informed assessments and decisions about the organization. If the disclosures from the Topic Standards do not provide sufficient information about the organization's impacts, then the organization should report additional disclosures.

These can include the additional sector disclosures recommended in the GRI Sector Standards, disclosures from other sources, or disclosures developed by the organization itself.

Disclosures that the organization reports from other sources or that are developed by the organization itself, should have the same rigor as disclosures from the GRI Standards, and they should align with expectations set out in authoritative intergovernmental instruments.

Reporting on material topics not covered in the GRI Topic Standards

When the organization's material topic is not covered by the disclosures in the GRI Topic Standards, the organization is required to report how it manages the material topic, using Disclosure 3-3 in GRI 3: Material Topics 2021. See Requirement 4-c in this

Standard for more information.

In addition to reporting Disclosure 3-3, the organization should report other disclosures for that topic. These can include the additional sector disclosures recommended in the GRI Sector Standards, disclosures from other sources, or disclosures developed by the organization itself.

For example, an organization determines freedom of speech to be a material topic. As there is no Topic Standard that covers this topic, the organization should report disclosures from other sources or develop its own disclosures to report on the topic. The organization is still required to report how it manages the topic of freedom of speech, using Disclosure 3-3 in GRI 3.

Guidance to 5-b

The organization is required to comply with Requirement 5-b only if GRI Sector Standards that apply to its sectors are available. The Sector Standards provide information for organizations about their likely material topics.

The organization is required to review each topic described in the applicable Sector Standards and determine whether it is a material topic for the organization.

If the organization determines a topic in an applicable Sector Standard to be material, the Sector Standard helps the organization identify disclosures to report information about its impacts in relation to that topic. For each likely material topic, the Sector Standards list disclosures from the GRI Topic Standards for organizations to report. If any of the Topic Standards disclosures listed in the Sector Standards are not relevant to the organization's impacts, the organization is not required to report these. However, the organization is required to list these disclosures in the GRI content index and provide 'not applicable' as the reason for omission for not reporting the disclosures. The organization is also required to explain in brief why the disclosures are not relevant to its impacts in relation to the material topic. See Requirement 6 in this Standard for more information on reasons for omission.

Note that when reporting the Topic Standards disclosures listed in the Sector Standards, the organization can still use any of the four reasons for omission included in Table 1 of this Standard if it cannot comply with the disclosure or with a requirement in the disclosure.

Besides the disclosures from the Topic Standards, the Sector Standards may list additional sector disclosures for organizations to report. Reporting these additional sector disclosures is a recommendation. The organization is not required to provide a reason for omission for the additional sector disclosures it does not report.

Requirement 6: Provide reasons for omission for disclosures and requirements that the organization cannot comply with

Question Code	GRI 1-3.6	Status	To Do
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

1. If the organization cannot comply with a disclosure or with a requirement in a disclosure for which reasons for omission are permitted, the organization shall in the GRI content index:
 2. specify the disclosure or the requirement it cannot comply with;
 1. provide one of the four reasons for omission included in Table 1 and the required explanation for that reason.
See Table 1 of this Standard for examples of how to present this information.

Details

Reasons for omission are permitted for all disclosures from the GRI Standards except for:

- Disclosure 2-1 Organizational details
- Disclosure 2-2 Entities included in the organization's sustainability reporting
- Disclosure 2-3 Reporting period, frequency and contact point
- Disclosure 2-4 Restatements of information
- Disclosure 2-5 External assurance
- Disclosure 3-1 Process to determine material topics
- Disclosure 3-2 List of material topics

The organization is only permitted to provide one of the four reasons for omission included in Table 1 of this Standard:

Not applicable

The organization provides 'not applicable' as the reason for omission in the following situations:

- When a disclosure or a requirement in a disclosure does not apply to the organization based on its characteristics (e.g., size, type). For example, 2-15-b-iii in GRI 2: General Disclosures 2021 requires the organization to report whether conflicts of interest relating to the existence of controlling shareholders are disclosed to stakeholders.
This requirement does not apply to organizations that do not have shareholders (e.g., foundations).
In such cases, the organization is required to explain why the disclosure or the requirement does not apply to the organization.
However, there may be cases where a disclosure or a requirement in a disclosure applies to the organization, but the organization does not have in place the item specified in the disclosure or in the requirement (e.g., committee, policy, practice, process). For example, 2-23-b in GRI 2 requires the organization to describe its policy commitment to respect human rights. This expectation applies to every organization. All organizations are expected to have a policy commitment to respect human rights, but not every organization may have developed such a policy commitment yet.
If the organization cannot report the required information about an item specified in a disclosure because the item (e.g., committee, policy, practice, process) does not exist, it can comply with the requirement by reporting this to be the case. It does not need to provide the 'not applicable' reason for omission.
In such cases, the organization can explain the reasons for not having this item or describe any plans to develop it.
The disclosure does not require the organization to implement the item (e.g., developing a policy), but to report that the item does not exist.

- When a disclosure from the GRI Topic Standards that is listed in the applicable GRI Sector Standards is not relevant to the organization's impacts in relation to a material topic. In such cases, the organization is required to explain why the disclosure is not relevant to its impacts in relation to the material topic.

Legal prohibitions

The organization provides 'legal prohibitions' as the reason for omission when the law forbids collecting the required information or reporting it publicly.

Confidentiality constraints

There may be cases where the law does not forbid collecting or reporting the required information, but the organization considers the information confidential and cannot report it publicly. In such cases, the organization provides 'confidentiality constraints' as the reason for omission.

Information unavailable/incomplete


There may be cases where the organization has the item specified in a disclosure or in a requirement in a disclosure, but the information about the item is unavailable or incomplete. In such cases, the organization provides 'information unavailable/incomplete' as the reason for omission. For example, information is unavailable for Disclosure 305-3 in GRI 305: Emissions 2016 when the organization has other indirect (Scope 3) greenhouse gas (GHG) emissions, but it has not collected data on its other indirect (Scope 3) GHG emissions yet.

When the organization cannot report part of the required information it means the information is incomplete. When the reported information does not cover the complete scope required by a disclosure (e.g., the information is missing for certain entities, sites, geographic locations), then the organization is required to provide 'information unavailable/incomplete' as the reason for omission. The organization must specify the entities, sites, geographic locations, etc., for which the required information is missing and cannot be reported.

The required information, or part of the required information, can be unavailable when, for example, it cannot be obtained or is not of adequate quality to report. This may be the case when the information is collected from another organization, such as a supplier.

The reasons 'confidentiality constraints' and 'information unavailable/incomplete' should only be used in exceptional cases. Using 'confidentiality constraints' and 'information unavailable/incomplete' frequently as reasons for omitting information reduces the credibility and usefulness of the organization's sustainability reporting. It does not align with the aim of reporting in accordance with the GRI Standards, which is to provide a comprehensive picture of the organization's most significant impacts. The organization is not allowed to use other reasons for omission than those included in Table 1 of this Standard. The organization is required to report reasons for omission in the GRI content index. See Requirement 7 in this Standard for more information on the content index.

Requirement 7: Publish a GRI content index

Question Code	GRI 1-3.7	Status	 To Do
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

The organization shall:
publish a GRI content index that includes:

1. the title: GRI content index;
2. the statement of use;
3. the title of GRI 1 used;
4. the title(s) of the GRI Sector Standard(s) that apply to the organization's sector(s);
5. a list of the organization's material topics;
6. a list of the topics in the applicable GRI Sector Standard(s) determined as not material and an explanation for why they are not material;
7. a list of the reported disclosures, including the disclosure titles;
8. the titles of the GRI Standards and other sources that the reported disclosures come from;
9. when the organization does not report GRI Topic Standard disclosures for a material topic from the applicable GRI Sector Standard(s), a list of the disclosures and the required reason for omission;
10. the GRI Sector Standard reference numbers for the disclosures from the applicable Sector Standard(s);
11. the location where the information reported for each disclosure can be found;
12. any reasons for omission used;
 1. if it publishes a standalone sustainability report and the GRI content index is not included in the report itself, provide a link or reference to the GRI content index in the report.

Details

The information reported using the GRI Standards can be published or made accessible in a range of formats (e.g., electronic, paper-based) across one or more locations (e.g., a standalone sustainability report, web pages, an annual report). The GRI content index provides an overview of the organization's reported information, shows where the reported information can be found, and helps information users access this information. The content index also shows which GRI Standards and disclosures the organization has used.

Appendix 1 of this Standard provides guidance on how to prepare the GRI content index when reporting in accordance with the GRI Standards. It includes an example that the organization can use to prepare the content index. The organization can use a different format for the content index than the one provided in Appendix 1, as long as it complies with the requirements for the content index.

Requirement 8: Provide a statement of use

Question Code	GRI 1-3.8	Status	<div><div></div>To Do</div>
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

1. The organization shall include the following statement in its GRI content index:
[Name of organization] has reported in accordance with the GRI Standards for the period [reporting period start and end dates].

Details

To state that the organization has reported in accordance with the GRI Standards, the organization must have complied with all nine requirements in this section.

The organization is required to insert the name of the organization and the start and end dates of its reporting period in the statement, for example: 'ABC Limited has reported in accordance with the GRI Standards for the period from 1 January 2022 to 31 December 2022.'

The organization is required to report whether the highest governance body is responsible for reviewing and approving the reported information, including the organization's material topics, under Disclosure 2-14 in GRI 2: General Disclosures 2021.

Requirement 9: Notify GRI

Question Code	GRI 1-3.9	Status	<div><div></div>To Do</div>
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question


1. The organization shall notify GRI of the use of the GRI Standards and the statement of use by sending an email to reportregistration@globalreporting.org.

Details

The organization should include the following information in the email:

- The legal name of the organization.
 - The link to the GRI content index.
 - The link to the report, if publishing a standalone sustainability report.
 - The statement of use.
 - A contact person in the organization and their contact details.
- There is no cost associated with notifying GRI of the use of the GRI Standards.

Accuracy

Question Code	GRI 1-4.1	Status	 To Do
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

Requirement

1. The organization shall report information that is correct and sufficiently detailed to allow an assessment of the organization's impacts.

Details

The characteristics that determine accuracy vary depending on the nature of the information (qualitative or quantitative) and the intended use of the information. The accuracy of quantitative information depends on the specific methods used to gather, compile, and analyze data. The accuracy of qualitative information depends on the level of detail and consistency with the available evidence. Information users require sufficient detail to make assessments about the organization's impacts.

To apply the Accuracy principle, the organization should:

- report qualitative information that is consistent with available evidence and other reported information;
- indicate which data has been measured;
- adequately describe data measurements and bases for calculations, and ensure it is possible to replicate measurements and calculations with similar results;
- ensure that the margin of error for data measurements does not inappropriately influence the conclusions or assessments of information users;
- indicate which data has been estimated, and explain the underlying assumptions and techniques used for the estimation as well as any limitations of the estimates.

Balance

Question Code	GRI 1-4.2	Status	<div><div></div>To Do</div>
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

Requirement

1. The organization shall report information in an unbiased way and provide a fair representation of the organization’s negative and positive impacts.

Details

To apply the Balance principle, the organization should:

- present information in a way that allows information users to see negative and positive year-on-year trends in impacts;
- distinguish clearly between facts and the organization’s interpretation of the facts;
- not omit relevant information concerning its negative impacts;
- not overemphasize positive news or impacts;
- not present information in a way that is likely to inappropriately influence the conclusions or assessments of information users.

Clarity

Question Code	GRI 1-4.3	Status	<div><div></div>To Do</div>
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

Requirement


1. The organization shall present information in a way that is accessible and understandable.

Details

To apply the Clarity principle, the organization should:

- consider specific accessibility needs of information users, associated with abilities, language, and technology;
- present information in a way that users can find the information they want without unreasonable effort, for example, through a table of contents, maps, or links;
- present information in a way that it can be understood by users who have reasonable knowledge of the organization and its activities;
- avoid abbreviations, technical terms, or other jargon likely to be unfamiliar to users or, if these are used, include relevant explanations in the appropriate sections or in a glossary;
- report information in a concise way and aggregate information where useful without omitting necessary details;
- use graphics and consolidated data tables to make information accessible and understandable.

Comparability

Question Code	GRI 1-4.4	Status	 To Do
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

Requirement

1. The organization shall select, compile, and report information consistently to enable an analysis of changes in the organization's impacts over time and an analysis of these impacts relative to those of other organizations.


Details

Information reported in a comparable way enables the organization and other information users to assess the organization's current impacts against its past impacts and its goals and targets. It also enables external parties to assess and benchmark the organization's impacts against impacts of other organizations as part of rating activities, investment decisions, and advocacy programs.

To apply the Comparability principle, the organization should:

- present information for the current reporting period and at least two previous periods, as well as any goals and targets that have been set;
- use accepted international metrics (e.g., kilograms, liters), and standard conversion factors and protocols, where applicable, for compiling and reporting information;
- maintain consistency in the methods used to measure and calculate data and in explaining the methods and assumptions used;
- maintain consistency in the manner of presenting the information; report total numbers or absolute data (e.g., metric tons of CO2 equivalent) as well as ratios or normalized data (e.g., CO2 emissions per unit produced) to enable comparisons, and provide explanatory notes when using ratios; provide contextual information (e.g., the organization's size, geographic location) to help information users understand the factors that contribute to differences between the organization's impacts and the impacts of other organizations;
- present the current disclosures alongside restatements of historical data to enable comparisons if there have been changes from the information reported previously. This can include changes in the length of the reporting period, in the measurement methodologies, in the definitions used, or in other elements of reporting. The organization is required to report restatements of information under Disclosure 2-4 in GRI 2: General Disclosures 2021;
- if restatements of historical data are not provided, explain the changes to provide contextual information for interpreting the current disclosures.

Completeness

Question Code	GRI 1-4.5	Status	 To Do
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

Requirement


1. The organization shall provide sufficient information to enable an assessment of the organization's impacts during the reporting period.

Details

To apply the Completeness principle, the organization should:

- present activities, events, and impacts for the reporting period in which they occur. This includes reporting information about activities that have a minimal impact in the short-term, but a reasonably foreseeable cumulative impact that can become unavoidable or irreversible in the long-term (e.g., activities that generate bio-accumulative or persistent pollutants);
- not omit information that is necessary for understanding the organization's impacts.
If the organization consists of multiple entities (i.e., a parent entity and its subordinate entities), the organization is required to explain the approach used for consolidating the information under 2-2-c in GRI 2: General Disclosures 2021.
If the information for a disclosure or a requirement in a disclosure for which reasons for omission are permitted is unavailable or incomplete, then the organization is required to provide a reason for omission. When information is incomplete, the organization is required to specify which part is missing (e.g., specify the entities for which the information is missing). See Requirement 6 in this Standard for more information.

Sustainability context

Question Code	GRI 1-4.6	Status	 To Do
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

Requirement

1. The organization shall report information about its impacts in the wider context of sustainable development.

Details

Sustainable development has been defined as 'development which meets the needs of the present without compromising the ability of future generations to meet their own needs' [8]. The objective of sustainability reporting using the GRI Standards is to provide transparency on how an organization contributes or aims to contribute to sustainable development. For this purpose, the organization needs to assess and report information about its impacts in the wider context of sustainable development. To apply the Sustainability context principle, the organization should:

- draw on objective information and authoritative measures on sustainable development to report information about its impacts (e.g., scientific research or consensus on the limits and demands placed on environmental resources);
- report information about its impacts in relation to sustainable development goals and conditions (e.g., reporting total greenhouse gas [GHG] emissions as well as reductions in GHG emissions in relation to the goals set out in the United Nations [UN] Framework Convention on Climate Change [FCCC] Paris Agreement [4]);
- report information about its impacts in relation to societal expectations and expectations of responsible business conduct set out in authoritative intergovernmental instruments with which the organization is expected to comply (e.g., Organisation for Economic Co-operation and Development [OECD] Guidelines for Multinational Enterprises [3], UN Guiding Principles on Business and Human Rights [5]) and in other recognized sector-specific, local, regional, or global instruments;
- if operating in a range of locations, report information about its impacts in relation to appropriate local contexts (e.g., reporting total water use, as well as water use relative to the sustainable thresholds and the social context of given catchments).

Understanding the sustainability context provides the organization with critical information to determine and report on its material topics (see GRI 3: Material Topics 2021). The GRI Sector Standards describe the sectors' context and can help the organization understand its sustainability context.

Timeliness

Question Code	GRI 1-4.7	Status	<div><div></div>To Do</div>
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

Requirement

1. The organization shall report information on a regular schedule and make it available in time for information users to make decisions.


Details

The usefulness of information is closely tied to whether it is available in time for information users to integrate it into their decision-making. Thus, the Timeliness principle refers to how regularly and how soon after the reporting period the information is published.

To apply the Timeliness principle, the organization should:

- find a balance between the need to make information available in a timely manner and ensuring that the information is of high quality and meets the requirements under the other reporting principles;
- ensure consistency in the length of reporting periods;
- indicate the time period covered by the reported information.
See section 5.1 in this Standard for information on aligning the reporting periods and publishing schedules of sustainability reporting and other types of reporting.

Verifiability

Question Code	GRI 1-4.8	Status	 To Do
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

Requirement

1. The organization shall gather, record, compile, and analyze information in such a way that the information can be examined to establish its quality.

Details

It is important that the reported information can be examined to establish its veracity and to determine the extent to which the reporting principles have been applied.

To apply the Verifiability principle, the organization should:

- set up internal controls and organize documentation in such a way that individuals other than those preparing the reported information (e.g., internal auditors, external assurance providers) can review them;
- document the decision-making processes underlying the organization's sustainability reporting in a way that allows for the examination of the key decisions and processes, such as the process of determining material topics;
- if the organization designs information systems for its sustainability reporting, design these systems in a way that they can be examined as part of an external assurance process;
- be able to identify the original sources of the reported information and provide reliable evidence to support assumptions or calculations;
- be able to provide representation from the original sources of the reported information attesting to the accuracy of the information within acceptable margins of error;
- avoid including information that is not substantiated by evidence unless it is relevant for understanding the organization's impacts;
- provide clear explanations of any uncertainties associated with the reported information.
See section 5.2 in this Standard for more information on enhancing the credibility of the organization's sustainability reporting.


5.1 Aligning sustainability reporting with other reporting

Question Code	GRI 1-5.1	Status	<div><div></div>To Do</div>
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

An organization should align its sustainability reporting with other statutory and regulatory reporting, in particular its financial reporting. This means that the organization should report the information for the same reporting period and for the same group of entities as covered in its financial reporting. The organization should also publish the information at the same time as its financial reporting, where this is possible.

5.2 Enhancing the credibility of sustainability reporting

Question Code	GRI 1-5.2	Status	 To Do
Topic	GRI 1: Foundation 2021	Assignee	Bob Demo
Category	Framework Guidance	Reviewer	Steve Foster

Question

There are several ways in which an organization can enhance the credibility of its sustainability reporting. These include the use of internal controls, external assurance, and stakeholder or expert panels. The organization is not required to apply these methods when reporting in accordance with the GRI Standards but is encouraged to do so.

Internal controls

The organization should set up internal controls to strengthen the integrity and credibility of its sustainability reporting. Internal controls are processes designed and implemented by the organization, generally its management, to provide reasonable assurance regarding the achievement of its objectives.

Internal controls can be implemented in day-to-day operations and through compliance functions. The organization can also establish and maintain an internal audit function as part of its processes for risk management to further improve the credibility of its sustainability reporting.

In some jurisdictions, corporate governance codes require the highest governance body to inquire and, if it is satisfied, to confirm the adequacy of an organization's internal controls in the annual report. This confirmation may only relate to the adequacy of the internal controls for financial reporting. It may not provide information about whether the same internal controls are also adequate to assess the credibility of the organization's sustainability reporting. If the organization relies on internal controls set up for financial reporting, it should assess the relevance of these controls for its sustainability reporting. In cases where these controls are inadequate, the organization should identify and use additional internal controls to assess the credibility of its sustainability reporting.

External assurance

In addition to internal controls, the organization should seek external assurance for its sustainability reporting. Disclosure 2-5 in GRI 2: General Disclosures 2021 requires the organization to describe its policy and practice for seeking external assurance for its sustainability reporting. If the sustainability reporting has been externally assured, the organization is also required to describe what was assured and on what basis.

External assurance comprises activities carried out by assurance providers to assess the quality and credibility of the qualitative and quantitative information reported by the organization. External assurance can also be used to assess the organization's systems or processes to prepare the information (e.g., the process of determining material topics). External assurance is different from activities used to assess or validate the performance, such as compliance assessments or the issuing of performance certifications.

External assurance results in published assurance reports or conclusions that can be used to verify that the information has been prepared in accordance with reporting standards. It can also be used to reduce risk in data quality and increase trust in the reported information. This, in turn, helps information users and the organization rely on the reported information for their decision-making.

External assurance should be conducted by competent assurance providers with appropriate experience and qualifications. Assurance providers should be:

- independent from the organization and therefore able to reach impartial and objective conclusions about the organization's reporting and to publish these conclusions in a report that is publicly available;
- demonstrably competent in the subject matter and assurance practices;
- competent in applying quality control procedures to the assurance engagement;
- able to conduct the engagement in a manner that is systematic, documented, evidence-based, and characterized by defined procedures in line with professional standards for assurance;
- able to consider the selection of the information reported as well as its accuracy, and to assess whether the reporting provides a comprehensive picture of the organization's most significant impacts and how it manages these impacts;

- able to assess the extent to which the organization has applied the GRI Standards in formulating opinions or reaching conclusions.

Stakeholder or expert panels

The organization can also convene a stakeholder or expert panel to seek views on its approach to sustainability reporting or for advice on the information to be reported.

GRI 2: General Disclosures 2021

Governance structure and composition

Question Code	GRI 2-9	Status	In Progress
Topic	GRI 2: General Disclosures 2021	Assignee	Dan McCallum
Category	Business Overview	Reviewer	Steve Foster

Question

The organization shall:

1. describe its governance structure, including committees of the highest governance body;
2. list the committees of the highest governance body that are responsible for decision-making on and overseeing the management of the organization's impacts on the economy, environment, and people;
3. describe the composition of the highest governance body and its committees by:
 1. executive and non-executive members;
 1. independence;
 2. tenure of members on the governance body;
 3. number of other significant positions and commitments held by each member, and the nature of the commitments;
 4. gender;
 5. under-represented social groups;
 6. competencies relevant to the impacts of the organization;
 7. stakeholder representation.

Details

Guidance to 2-9-c

The organization can describe the composition of the highest governance body and its committees by additional indicators of diversity, such as age, ancestry and ethnic origin, citizenship, creed, disability, or any other indicators of diversity that are relevant for reporting.

Guidance to 2-9-c-ii

'Independence' refers to conditions that enable the members of the highest governance body to exercise independent judgment free from any external influence or conflicts of interest. See reference [20] in the Bibliography for more information on independence criteria for governance bodies.

Guidance to 2-9-c-iv

A position or commitment held by a highest governance body member is significant when the time and attention it demands compromises the member's ability to perform its duties in the organization. Significant positions can include cross-board memberships.

Guidance to 2-9-c-vii

Competencies relevant to the impacts of the organization include competencies relevant to impacts commonly associated with the organization's sectors, products, and geographic locations.

Communication of critical concerns

Question Code	GRI 2-16	Status	<div><div></div>In Progress</div>
Topic	GRI 2: General Disclosures 2021	Assignee	Dan McCallum
Category	Business Overview	Reviewer	Steve Foster

Question

The organization shall:

1. describe whether and how critical concerns are communicated to the highest governance body;
2. report the total number and the nature of critical concerns that were communicated to the highest governance body during the reporting period.

Details

Critical concerns include concerns about the organization's potential and actual negative impacts on stakeholders raised through grievance mechanisms and other processes. They also include concerns identified through other mechanisms about the organization's business conduct in its operations and its business relationships. See guidance to Disclosure 2-25 and Disclosure 2-26 in this Standard for more information.

GRI 302: Energy 2016

Energy consumption within the organization

Question Code	GRI 302-1	Status	In Progress
Topic	GRI 302: Energy 2016	Assignee	Cameron Ravanbach
Category	Energy Management	Reviewer	Steve Foster

Question

The reporting organization shall report the following information:

1. Total fuel consumption within the organization from non-renewable sources, in joules or multiples, and including fuel types used.
2. Total fuel consumption within the organization from renewable sources, in joules or multiples, and including fuel types used.
3. In joules, watt-hours or multiples, the total:
 4. electricity consumption
 1. heating consumption
 2. cooling consumption
 3. steam consumption
 1. In joules, watt-hours or multiples, the total:
 2. electricity sold
 1. heating sold
 2. cooling sold
 3. steam sold
1. Total energy consumption within the organization, in joules or multiples.
2. Standards, methodologies, assumptions, and/or calculation tools used.
3. Source of the conversion factors used.

Compilation requirements

- 2.1 When compiling the information specified in Disclosure 302-1, the reporting organization shall:
- 2.1.1 avoid the double-counting of fuel consumption, when reporting self-generated energy consumption. If the organization generates electricity from a non-renewable or renewable fuel source and then consumes the generated electricity, the energy consumption shall be counted once under fuel consumption;
 - 2.1.2 report fuel consumption separately for non-renewable and renewable fuel sources;
 - 2.1.3 only report energy consumed by entities owned or controlled by the organization;
 - 2.1.4 calculate the total energy consumption within the organization in joules or multiples using the following formula:
Total energy consumption within the organization = Non-renewable fuel consumed + Renewable fuel consumed + Electricity, heating, cooling, and steam purchased for consumption + Self-generated electricity, heating, cooling, and steam, which are not consumed (see clause 2.1.1) - Electricity, heating, cooling, and steam sold

Details

Recommendations

2.2 When compiling the information specified in Disclosure 302-1, the reporting organization should: 2.2.1 apply conversion factors consistently for the data disclosed; 2.2.2 use local conversion factors to convert fuel to joules, or multiples, when possible; 2.2.3 use the generic conversion factors, when local conversion factors are unavailable; 2.2.4 if subject to different standards and methodologies, describe the approach to selecting them; 2.2.5 report energy consumption for a consistent group of entities. When possible, the group of entities should also be consistent with the group of entities used in Disclosures 305-1 and 305-2 of GRI 305: Emissions 2016; 2.2.6 where it aids transparency or comparability over time, provide a breakdown of energy consumption data by: 2.2.6.1 business unit or facility; 2.2.6.2 country; 2.2.6.3 type of source (see definitions for the listing of non-renewable sources and renewable sources); 2.2.6.4 type of activity.

Background

For some organizations, electricity is the only significant form of energy they consume. For others, energy sources such as steam or water provided from a district heating plant or chilled water plant can also be important.

Energy can be purchased from sources external to the organization or produced by the organization itself (self-generated).

Non-renewable fuel sources can include fuel for combustion in boilers, furnaces, heaters, turbines, flares, incinerators, generators and vehicles that are owned or controlled by the organization. Non-renewable fuel sources cover fuels purchased by the organization. They also include fuel generated by the organization's activities – such as mined coal, or gas from oil and gas extraction.

Renewable fuel sources can include biofuels, when purchased for direct use, and biomass in sources owned or controlled by the organization.

Consuming non-renewable fuels is usually the main contributor to direct (Scope 1) GHG emissions, which are reported in Disclosure 305-1 of GRI 305: Emissions 2016. Consuming purchased electricity, heating, cooling, and steam contributes to the organization's energy indirect (Scope 2) GHG emissions, which are reported in Disclosure 305-2 of GRI 305: Emissions 2016.

Methodology

We respond to this question through detailing public-private partnerships around resilience in infrastructure, especially in the developing world, as shown through our Laos case study.

Final response

Scope 1 Emissions = 100,500 tCO₂e

Scope 2 Emissions = 250,100 tCO₂e

Scope 3 Emissions = 50,500 tCO₂e

Energy intensity

Question Code	GRI 302-3	Status	In Progress
Topic	GRI 302: Energy 2016	Assignee	Cameron Ravanbach
Category	Energy Management	Reviewer	Evan Hearn

Question

The reporting organization shall report the following information:

1. Energy intensity ratio for the organization.
2. Organization-specific metric (the denominator) chosen to calculate the ratio.
3. Types of energy included in the intensity ratio; whether fuel, electricity, heating, cooling, steam, or all.
4. Whether the ratio uses energy consumption within the organization, outside of it, or both.

Compilation requirements

2.5 When compiling the information specified in Disclosure 302-3, the reporting organization shall:

2.5.1 calculate the ratio by dividing the absolute energy consumption (the numerator) by the organization-specific metric (the denominator);

2.5.2 if reporting an intensity ratio both for the energy consumed within the organization and outside of it, report these intensity ratios separately.

Details

Recommendations

2.6 When compiling the information specified in Disclosure 302-3, the reporting organization should, where it aids transparency or comparability over time, provide a breakdown of the energy intensity ratio by: 2.6.1 business unit or facility; 2.6.2 country; 2.6.3 type of source (see definitions for the listing of non-renewable sources and renewable sources); 2.6.4 type of activity.

Guidance for Disclosure 302-3

Intensity ratios can be provided for, among others:

- products (such as energy consumed per unit produced);
- services (such as energy consumed per function or per service);
- sales (such as energy consumed per monetary unit of sales).
Organization-specific metrics (denominators) can include:
 - units of product;
 - production volume (such as metric tons, liters, or MWh);
 - size (such as m² floor space);
 - number of full-time employees;
 - monetary units (such as revenue or sales).


Background

Energy intensity ratios define energy consumption in the context of an organization-specific metric.

These ratios express the energy required per unit of activity, output, or any other organization-specific metric. Intensity ratios are often called normalized environmental impact data.

In combination with the organization's total energy consumption, reported in Disclosures 302-1 and 302-2, energy intensity helps to contextualize the organization's efficiency, including in relation to other organizations.

Reduction of energy consumption

Question Code	GRI 302-4	Status	 To Do
Topic	GRI 302: Energy 2016	Assignee	Cameron Ravanbach
Category	Energy Management	Reviewer	Colby Sturtevant

Question

The reporting organization shall report the following information:

1. Amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives, in joules or multiples.
2. Types of energy included in the reductions; whether fuel, electricity, heating, cooling, steam, or all.
3. Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it.
4. Standards, methodologies, assumptions, and/or calculation tools used.

Compilation requirements

2.7 When compiling the information specified in Disclosure 302-4, the reporting organization shall:

2.7.1 exclude reductions resulting from reduced production capacity or outsourcing;

2.7.2 describe whether energy reduction is estimated, modeled, or sourced from direct If estimation or modeling is used, the organization shall disclose the methods used.

Details

Recommendations

2.8 When compiling the information specified in Disclosure 302-4, the reporting organization should, if subject to different standards and methodologies, describe the approach to selecting them.

Guidance for Disclosure 302-4

The reporting organization can prioritize disclosing reduction initiatives that were implemented in the reporting period, and that have the potential to contribute significantly to reductions. The organization can describe reduction initiatives and their targets when reporting how it manages this topic.

Reduction initiatives can include:

- process redesign;
- conversion and retrofitting of equipment;
- changes in behavior;
- operational changes.

The organization can report reductions in energy consumption by combining energy types, or separately for fuel, electricity, heating, cooling, and steam.

The organization can also provide a breakdown of reductions in energy consumption by individual initiatives or groups of initiatives.

Reductions in energy requirements of products and services

Question Code	GRI 302-5	Status	<div><div></div>To Do</div>
Topic	GRI 302: Energy 2016	Assignee	Georgina Macrae
Category	Energy Management	Reviewer	Colby Sturtevant

Question

The reporting organization shall report the following information:

1. Reductions in energy requirements of sold products and services achieved during the reporting period, in joules or multiples.
2. Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it.
3. Standards, methodologies, assumptions, and/or calculation tools used.

Details

Recommendations

2.9 When compiling the information specified in Disclosure 302-5, the reporting organization should: 2.9.1 if subject to different standards and methodologies, describe the approach to selecting them; 2.9.2 refer to industry use standards to obtain this information, where available (such as fuel consumption of cars for 100 km at 90 km/h).

Guidance for Disclosure 302-5

Use-oriented figures can include, for example, the energy requirements of a car or a computer.
Consumption patterns can include, for example, 10 percent less energy use per 100 km travelled or per time unit (hour, average working day).

GRI 302 Management Approach

Question Code	GRI 302-M.A.	Status	<div><div></div>To Do</div>
Topic	GRI 302: Energy 2016	Assignee	Joseph Magee-Billson
Category	Management Approach	Reviewer	Steve Foster

Question


The reporting organization shall report how it manages energy using Disclosure 3-3 in GRI 3: Material Topics 2021.

Details

The reporting organization can also explain whether it is subject to any country, regional, or industry-level energy regulations and policies. Additionally, it can provide examples of these regulations and policies.

GRI 303: Water and Effluents 2018

Interactions with water as a shared resource

Question Code	GRI 303-1	Status	 To Do
Topic	GRI 303: Water and Effluents 2018	Assignee	Joseph Magee-Billson
Category	Water and Effluents	Reviewer	Steve Foster

Question

The reporting organization shall report the following information:

1. A description of how the organization interacts with water, including how and where water is withdrawn, consumed, and discharged, and the water-related impacts the organization has caused or contributed to, or that are directly linked to its operations, products, or services by its business relationships (e.g., impacts caused by runoff).
2. A description of the approach used to identify water-related impacts, including the scope of assessments, their timeframe, and any tools or methodologies used.
3. A description of how water-related impacts are addressed, including how the organization works with stakeholders to steward water as a shared resource, and how it engages with suppliers or customers with significant water-related impacts.
4. An explanation of the process for setting any water-related goals and targets that are part of the organization's approach to managing water and effluents, and how they relate to public policy and the local context of each area with water stress.

Details

Recommendations

1.2 The reporting organization should report the following additional information: 1.2.1 An overview of water use across the organization's value chain; 1.2.2 A list of specific catchments where the organization causes significant water-related impacts.

Guidance for Disclosure 303-1

Through its value chain, an organization can affect both the quality as well as the availability of water. If the reporting organization has identified significant water-related impacts in the value chain, which includes activities carried out by the organization, and by entities upstream and downstream from the organization, it is required to report information about these impacts. See

Guidance to 3-3-b in GRI 3: Material Topics 2021 for more information about reporting an organization's involvement with negative impacts.

The description of how the organization interacts with water can include information on specific catchments where water is withdrawn, consumed, and discharged, and information on what the water is used for in activities carried out by the organization and by entities upstream and downstream from the organization (e.g., for cooling, storage, incorporating in products, growing crops).

In the context of this Standard, suppliers with significant water-related impacts may include suppliers of water-intensive commodities or services, suppliers located in areas with water stress, and/or suppliers with significant impacts on the local water environment and the related local communities.

If applicable, the organization can describe its environmental impacts caused by runoff, and how they are addressed. For example, runoff can carry high-nutrient and pollution loads due to the organization's activities, leading to eutrophication and other negative impacts on local waterbodies.

Guidance for Disclosure 303-1-b

When assessing impacts, it is important that the organization consider its future impacts on water quality and availability, as these factors can change over time.

Tools and methodologies for identifying impacts can include life cycle assessments, environmental impact assessments, water footprint assessments, scenario analysis, and stakeholder engagement. If information is estimated or modeled, rather than sourced from direct measurements, the organization can explain its estimation or modeling methods.

Guidance for Disclosure 303-1-c

Working with stakeholders is critical for an organization to steward water as a shared resource and account for the needs of other water users of the catchment. An organization's stakeholders can include:

- suppliers with significant water-related impacts;
- users of its products and services;
- local communities and action groups;
- employees and other workers;
- other water users in its sector or industry;
- governments, regulators, and civil society organizations;
- global initiatives, trade associations, and partnerships.

The organization can describe how it participates in discussions with stakeholders, the frequency of this engagement, and its role in these discussions. Outcomes of working with stakeholders can include, for example, collective target-setting for water use, increased investment in infrastructure, policy advocacy, and capacity building and awareness raising.

When reporting on its engagement with suppliers, the organization can describe:

how the organization engages with its suppliers to help them improve their water management practices;

- the number of suppliers engaged;
 - the outcomes of this engagement;
 - the amount of procurement that the proportion of engaged suppliers represents;
 - why information is not requested from suppliers with significant water-related impacts;
 - future plans and goals for working with suppliers to reduce water-related impacts.
- Water impacts related to products and services might be addressed by, for example, improving product design, providing information and advice on the responsible use of products and services, and holding regular consultations with users.

Guidance for Disclosure 303-1-d

Meaningful targets for managing water-related impacts:

- account for the local context where water is withdrawn and discharged;
- are scientifically informed by sustainable thresholds and the social context of a given catchment;
- align with public sector efforts, such as the water-related targets of the UN Sustainable Development Goals, in particular Goal 6, or targets set by national and local government institutions;
- are informed by the advocacy of other stakeholders, such as civil society organizations, trade associations, and action groups.

The organization can report its progress toward the goals and targets using 3-3-e-iii in GRI 3: Material Topics 2021.

Guidance for clause 1.2.1

The organization can present the overview of water use across its value chain as a breakdown, in graphic or written form, showing, for example, parts of the value chain where water consumption is significant and the commodities to which it is related, or the percentage of commodity sourcing that comes from catchments located in areas with water stress. The organization is encouraged to include information about upstream as well as downstream water use (e.g., use of water for consumer products, such as soaps, shampoos, and cleaning solutions).

Guidance for clause 1.2.2

To identify catchments where it causes water-related impacts, the organization can use global catchment data sets. These include the CEO Water Mandate 'Interactive Database of the World's River Basins'¹, and the WWF 'HydroSHEDS'².

Management of water discharge-related impacts

Question Code	GRI 303-2	Status	In Progress
Topic	GRI 303: Water and Effluents 2018	Assignee	Joseph Magee-Billson
Category	Water and Effluents	Reviewer	Steve Foster

Question

The reporting organization shall report the following information:

- 1. A description of any minimum standards set for the quality of effluent discharge, and how these minimum standards were determined, including:
 - 2. how standards for facilities operating in locations with no local discharge requirements were determined;
- 1. any internally developed water quality standards or guidelines;
- 2. any sector-specific standards considered;
- 3. whether the profile of the receiving waterbody was considered.

Details

Guidance for Disclosure 303-2

Minimum standards are those that go beyond regulatory requirements in controlling the quality of effluent discharge. Water quality refers to the physical, chemical, biological, and taste-related characteristics of water. It is a measure of water suitability for a given purpose or function, including its use as a human right. Water quality standards help uphold water quality in order to protect ecosystems, wildlife, and human health and welfare, and can be based on water properties, such as temperature or pH value. The specific choice of water quality standards and parameters can vary depending on an organization's products, services, and facility locations, and can depend on national and/or regional regulations, as well as the profile of the receiving waterbody.

Methodology


Our ESG team worked with a consulting firm to develop our water resources strategy.

Jeff McKinnon <jeff.McKinnon@consultants.com> manages this relationship.

Final response

We do not yet have a comprehensive water resource strategy or any minimum standards for effluents but plan to in time for our 2024 Annual Report.

Water withdrawal

Question Code	GRI 303-3	Status	 To Do
Topic	GRI 303: Water and Effluents 2018	Assignee	Joseph Magee-Billson
Category	Water and Effluents	Reviewer	Steve Foster

Question

The reporting organization shall report the following information:

1. Total water withdrawal from all areas in megaliters, and a breakdown of this total by the following sources, if applicable:
 2. Surface water;
 1. Groundwater;
 2. Seawater;
 3. Produced water;
 4. Third-party water.
 1. Total water withdrawal from all areas with water stress in megaliters, and a breakdown of this total by the following sources, if applicable:
 2. Surface water;
 1. Groundwater;
 2. Seawater;
 3. Produced water;
 4. Third-party water, and a breakdown of this total by the withdrawal sources listed in i-iv.
 1. A breakdown of total water withdrawal from each of the sources listed in Disclosures 303-3-a and 303-3-b in megaliters by the following categories:
 2. Freshwater ($\leq 1,000$ mg/L Total Dissolved Solids);
 1. Other water ($> 1,000$ mg/L Total Dissolved Solids).
 1. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used.

Compilation requirements

2.1 When compiling the information specified in Disclosure 303-3, the reporting organization shall use publicly available and credible tools and methodologies for assessing water stress in an area.

Details

Recommendations

2.2 The reporting organization should report the following additional information: 2.2.1 A breakdown of total water withdrawal in megaliters by withdrawal source categories listed in Disclosure 303-3, at each facility in areas with water stress; 2.2.2 Total water withdrawal in megaliters by suppliers with significant water-related impacts in areas with water stress.

Background

The volume of water withdrawal from areas with water stress can indicate an organization's impacts in sensitive locations. To learn more about locations where water-related impacts might be significant, and where actions to address them are most

needed, the reporting organization can also report the information requested in Disclosure 303-3 for each facility in areas with water stress. This can give stakeholders more confidence in the organization's water stewardship efforts and practices.

Guidance for Disclosure 303-3

For an example of how to present information on requirements in Disclosure 303-3, see Table 1.

Surface water includes collected or harvested rainwater. Third-party water includes water supplied by municipal water networks or other organizations.

Guidance for Disclosure 303-3-b

Water stress refers to the ability, or lack thereof, to meet the human and ecological demand for water. Water stress can refer to the availability, quality, or accessibility of water.

Publicly available and credible tools for assessing areas with water stress include the World Resources Institute 'Aqueduct Water Risk Atlas,' and the WWF 'Water Risk Filter'.

Based on these tools, water stress in an area may be assessed using either of the following indicators and their thresholds:

- The ratio of total annual water withdrawal to total available annual renewable water supply (i.e., baseline water stress) is high (40-80%) or extremely high (>80%)³;
- The ratio of water consumption-to-availability (i.e., water depletion) is moderate (dry-year depletion, where for at least 10% of the time, the monthly depletion ratio is >75%), high (seasonal depletion, where for one month of the year on average, the depletion ratio is >75%), or very high (ongoing depletion, where the depletion ratio on average is >75%)⁴.
The organization may use these indicators even though they account only for quantity and not the quality or accessibility of water as per the inclusive approach to the definition of water stress.
The organization can complement the results from these tools with their own assessments, to provide more granular local-level data. Water stress in an area may be measured at catchment level at a minimum.

Guidance for Disclosure 303-3-b-v

If water is supplied by a third party, the organization is required to request information about its withdrawal sources, listed in Disclosures 303-3-b-i to 303-3-b-iv, from the third-party water supplier. The organization can report any additional information about third-party water, such as who the third-party water suppliers are and the volume of water supplied by them.

Guidance for Disclosure 303-3-c

The organization is required to provide a breakdown of the water withdrawn from each of the sources listed in Disclosures 303-3-a and 303-3-b (surface water, groundwater, seawater, produced water, third-party water) by the categories freshwater and other water. The organization is only required to provide this breakdown for the sources it has withdrawn water from. If all water withdrawn from a source belongs only to one category (i.e., to freshwater or to other water), the organization can report the volume for the remaining category as zero.

For example, if all the withdrawn seawater belongs to the other water category, the organization can report the volume of freshwater under this source as zero. Other water constitutes any water that has a concentration of total dissolved solids higher than 1,000 mg/L. Other water is therefore all water that does not fall into the freshwater category.

The organization is, at a minimum, required to report a figure for other water withdrawal for each of the sources listed in Disclosures 303-3-a and 303-3-b.

The organization can additionally report any further breakdowns for other water withdrawal based on its water management and reporting practices, as long as it explains the approach used to define water quality using Disclosure 303-3-d. The organization can report additional information on how water quality has been determined, including consideration of the potential value of water to its users, as well as any absolute physical and/or chemical criteria used.


Guidance for clause 2.2.1

To compile this information, the organization can use the following approach: (a) determine which facilities are located in areas with water stress, (b) for each of these facilities, report a breakdown of the total water withdrawal by surface water, groundwater, seawater, produced water, and third-party water. For an example of how to present this information, see Table 2.

Guidance for clause 2.2.2

To compile this information, the organization can use the following approach: (a) determine which suppliers are located in areas with water stress, (b) determine which of these suppliers cause significant water-related impacts, (c) add up the total water withdrawal of each of these suppliers, (d) report the sum. For an example of how to present this information, see Table 3.

Water discharge

Question Code	GRI 303-4	Status	 To Do
Topic	GRI 303: Water and Effluents 2018	Assignee	Joseph Magee-Billson
Category	Water and Effluents	Reviewer	Steve Foster

Question

The reporting organization shall report the following information:

1. Total water discharge to all areas in megaliters, and a breakdown of this total by the following types of destination, if applicable:
 2. Surface water;
 1. Groundwater;
 2. Seawater;
 3. Third-party water, and the volume of this total sent for use to other organizations, if applicable.
1. A breakdown of total water discharge to all areas in megaliters by the following categories:
 2. Freshwater ($\leq 1,000$ mg/L Total Dissolved Solids);
 1. Other water ($> 1,000$ mg/L Total Dissolved Solids).
 1. Total water discharge to all areas with water stress in megaliters, and a breakdown of this total by the following categories:
 2. Freshwater ($\leq 1,000$ mg/L Total Dissolved Solids);
 1. Other water ($> 1,000$ mg/L Total Dissolved Solids).
 1. Priority substances of concern for which discharges are treated, including:
 2. how priority substances of concern were defined, and any international standard, authoritative list, or criteria used;
 1. the approach for setting discharge limits for priority substances of concern;
 2. number of incidents of non-compliance with discharge limits.
 1. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used.

Compilation requirements

2.3 When compiling the information specified in Disclosure 303-4, the reporting organization shall use publicly available and credible tools and methodologies for assessing water stress in an area.

Details

Recommendations

2.4 The reporting organization should report the following additional information: 2.4.1 The number of occasions on which discharge limits were exceeded; 2.4.2 A breakdown of total water discharge to all areas in megaliters by level of treatment, and how the treatment levels were determined; 2.4.3 Percentage of suppliers with significant water-related impacts from water discharge that have set minimum standards for the quality of their effluent discharge.

Background

Quantifying the volume of water discharge can help an organization understand its negative impacts on the receiving waterbody.

The relationship between water discharge and negative impacts is not linear. An increase in the total volume of water discharge

does not necessarily correspond to greater negative impacts, since these impacts depend on the quality of the water discharge and the sensitivity of the receiving waterbody. An organization with a high volume of water discharge, but also a high level of treatment and strict quality standards, can have positive impacts on the receiving waterbody. To learn more about locations where water-related impacts might be significant, and where actions to address them are most needed, the reporting organization can also report the information requested in Disclosure 303-4 for each facility in areas with water stress.

Guidance for Disclosure 303-4

For an example of how to present information on requirements in Disclosure 303-4, see Table 1.
See

Guidance for Disclosure 303-3-b for how to assess areas with water stress.

Guidance for Disclosure 303-4-a-iv

An example of third-party water discharge is when an organization sends water and effluents to other organizations for use. In these instances, the organization is required to report the volume of this water discharge separately.

Guidance for Disclosures 303-4-b and 303-4-c

The organization is required to provide a breakdown of the water discharged to all areas and to all areas with water stress by the categories freshwater and other water. Other water constitutes any water that has a concentration of total dissolved solids higher than 1,000 mg/L. Other water is therefore all water that does not fall into the freshwater category.

The organization is, at a minimum, required to report a figure for other water discharged. The organization can additionally report any further breakdowns for other water discharge based on its water management and reporting practices, as long as it explains the approach used to define water quality using Disclosure 303-4-e. The organization can report additional information on how water quality has been determined, including consideration of the potential value of water to its users, as well as any absolute physical and/or chemical criteria used.

Guidance for Disclosure 303-4-d

In the context of this Standard, substances of concern are those that cause irreversible damage to the waterbody, ecosystem, or human health.

Discharge limits for substances of concern can be based on regulation and/or other factors determined by an organization. In countries where no regulations for discharge limits are available, the organization can develop its own discharge limits. 'Discharge consent' is the permission granted to an organization, allowing it to discharge a set amount of a substance. The organization can report any unauthorized discharges that exceed these limits using Disclosure 303-4-d. The organization can also describe any plans to reduce unauthorized discharges in the future.

Guidance for clause 2.4.2

Reporting water discharge by level of treatment can provide insight into the effort an organization is making to improve the quality of its water discharge. When reporting how the treatment levels were determined, the organization is expected to include the reasons why a certain level of treatment was set.

The level of treatment can be reported for any water or effluents at the point of discharge, whether treated by the organization onsite or sent to a third party for treatment.

Water treatment involves physical, chemical or biological processes that improve water quality by removing solids, pollutants, and organic matter from water and effluents. Minimum requirements for treatment might be specified in national, state, or local legislation; however, the organization is expected to consider its overall water discharge impacts and the needs of other water users in setting treatment levels.

The organization can break down its water discharge by the following treatment levels:

- Primary treatment, which aims to remove solid substances that settle or float on the water surface;
- Secondary treatment, which aims to remove substances and materials that have remained in the water, or are dissolved or suspended in it;
- Tertiary treatment, which aims to upgrade water to a higher level of quality before it is discharged. It includes processes that remove, for example, heavy metals, nitrogen, and phosphorus.

An organization might withdraw and discharge water of good quality that does not require treatment. If so, the organization can explain this in its reported information.


Guidance for clause 2.4.3

Minimum standards are those that go beyond regulatory requirements in controlling the quality of effluent discharge. For more information on water quality standards, see Disclosure 303-2 in the Topic management disclosures section.

To compile this information, the organization can use the following approach: (a) determine the number of suppliers with

significant water-related impacts from water discharge, (b) determine how many of these suppliers have set minimum standards for the quality of their effluent discharge, (c) calculate the percentage using the following formula:
Percentage of suppliers with significant water-related impacts from water discharge that have set minimum standards for the quality of their effluent discharge = Number of suppliers that have set minimum standards for the quality of their effluent discharge \ Number of suppliers with significant water-related impacts from water discharge x 100
For an example of how to present this information, see Table 3.

Water consumption

Question Code	GRI 303-5	Status	 To Do
Topic	GRI 303: Water and Effluents 2018	Assignee	Joseph Magee-Billson
Category	Water and Effluents	Reviewer	Steve Foster

Question

The reporting organization shall report the following information:

1. Total water consumption from all areas in megaliters.
2. Total water consumption from all areas with water stress in megaliters.
3. Change in water storage in megaliters, if water storage has been identified as having a significant water-related impact.
4. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used, including whether the information is calculated, estimated, modeled, or sourced from direct measurements, and the approach taken for this, such as the use of any sector-specific factors.

Details

Recommendations

2.5 The reporting organization should report the following additional information: 2.5.1 Total water consumption in megaliters at each facility in areas with water stress; 2.5.2 Total water consumption in megaliters by suppliers with significant water-related impacts in areas with water stress.

Background

Water consumption measures water used by an organization such that it is no longer available for use by the ecosystem or local community in the reporting period. Reporting the volume of water consumption can help the organization understand the overall scale of its impact due to water withdrawal on downstream water availability.

Guidance for Disclosure 303-5

For an example of how to present information on requirements in Disclosure 303-5, see Table 1.
See

Guidance for Disclosure 303-3-b for how to assess areas with water stress.

If the reporting organization cannot directly measure water consumption, it may calculate this using the following formula:
$$\text{Water consumption} = \text{Total water withdrawal} - \text{Total water discharge}$$

Guidance for Disclosure 303-5-c

If the water in storage has been identified as having a significant water-related impact, the organization is required to report change in water storage. The organization may calculate change in water storage using the following formula:
$$\text{Change in water storage} = \text{Total water storage at the end of the reporting period} - \text{Total water storage at the beginning of the reporting period}$$

Guidance for clause 2.5.1

To compile this information, the organization can use the following approach: (a) determine which facilities are located in areas with water stress, (b) for each of these facilities, report the total water consumption. For an example of how to present this information, see Table 2.

Guidance for clause 2.5.2

To compile this information, the organization can use the following approach: (a) determine which suppliers are located in areas with water stress, (b) determine which of these suppliers cause significant water-related impacts, (c) add up the total water consumption of each of these suppliers, (d) report the sum. For an example of how to present this information, see Table 3.

GRI 303 Management Approach

Question Code	GRI 303-M.A.	Status	<div><div></div>To Do</div>
Topic	GRI 303: Water and Effluents 2018	Assignee	Joseph Magee-Billson
Category	Management Approach	Reviewer	Steve Foster

Question

The reporting organization shall report how it manages water and effluents using Disclosure 3-3 in GRI 3: Material Topics 2021.

Details

Background

The disclosures in this section request essential information to help understand how an organization manages water-related impacts. The reporting organization can report any additional information about its water stewardship efforts and practices. An effective approach to managing water and effluents accounts for the local context of water use, and acknowledges the importance of stewarding water as a shared resource. An organization can reduce its water withdrawal, consumption, discharge, and associated impacts through efficiency measures, such as water recycling and reuse, and process redesign, as well as through collective actions that extend beyond its operations within the catchment. It can improve water quality through better treatment of water discharge.

GRI 304: Biodiversity 2016

Significant impacts of activities, products, and services on biodiversity

Question Code	GRI 304-2	Status	<div><div></div>To Do</div>
Topic	GRI 304: Biodiversity 2016	Assignee	Joseph Magee-Billson
Category	Biodiversity Management	Reviewer	Steve Foster

Question

The reporting organization shall report the following information:

1. Nature of significant direct and indirect impacts on biodiversity with reference to one or more of the following:

2. Construction or use of manufacturing plants, mines, and transport infrastructure;

1. Pollution (introduction of substances that do not naturally occur in the habitat from point and non-point sources);

2. Introduction of invasive species, pests, and pathogens;

3. Reduction of species;

4. Habitat conversion;

5. Changes in ecological processes outside the natural range of variation (such as salinity or changes in groundwater level).
1. Significant direct and indirect positive and negative impacts with reference to the following:

2. Species affected;

1. Extent of areas impacted;

2. Duration of impacts;

3. Reversibility or irreversibility of the impacts.

Details

Guidance for Disclosure 304-2

Indirect impacts on biodiversity can include impacts in the supply chain. Areas of impact are not limited to areas that are formally protected and include consideration of impacts on buffer zones, as well as formally designated areas of special importance or sensitivity.

Background

This disclosure provides the background for understanding (and developing) an organization's strategy to mitigate significant direct and indirect impacts on biodiversity. By presenting structured and qualitative information, the disclosure enables comparison of the relative size, scale, and nature of impacts over time and across organizations.

GRI 305: Emissions 2016

Direct (Scope 1) GHG emissions

Question Code	GRI 305-1	Status	To Do
Topic	GRI 305: Emissions 2016	Assignee	Joseph Magee-Billson
Category	Emissions & Air Quality	Reviewer	Steve Foster

Question

The reporting organization shall report the following information:

- Gross direct (Scope 1) GHG emissions in metric tons of CO₂ equivalent.
- Gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all.
- Biogenic CO₂ emissions in metric tons of CO₂ equivalent.
- Base year for the calculation, if applicable, including:
 - the rationale for choosing it;
 - emissions in the base year;
 - the context for any significant changes in emissions that triggered recalculations of base year emissions.
- Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.
- Consolidation approach for emissions; whether equity share, financial control, or operational control.
- Standards, methodologies, assumptions, and/or calculation tools used.

Compilation requirements

2.1 When compiling the information specified in Disclosure 305-1, the reporting organization shall:

- exclude any GHG trades from the calculation of gross direct (Scope 1) GHG emissions;
- report biogenic emissions of CO₂ from the combustion or biodegradation of biomass separately from the gross direct (Scope 1) GHG emissions. Exclude biogenic emissions of other types of GHG (such as CH₄ and N₂O), and biogenic emissions of CO₂ that occur in the life cycle of biomass other than from combustion or biodegradation (such as GHG emissions from processing or transporting biomass).

Details

Recommendations

2.2 When compiling the information specified in Disclosure 305-1, the reporting organization should: 2.2.1 apply emission factors and GWP rates consistently for the data disclosed; 2.2.2 use the GWP rates from the IPCC assessment reports based on a 100-year timeframe; 2.2.3 select a consistent approach for consolidating direct (Scope 1) and energy indirect (Scope 2) GHG emissions; choosing from the equity share, financial control, or operational control methods outlined in the 'GHG Protocol Corporate Standard'; 2.2.4 if subject to different standards and methodologies, describe the approach to selecting them; 2.2.5 where it aids transparency or comparability over time, provide a breakdown of the direct (Scope 1) GHG emissions by: 2.2.5.1 business unit or facility; 2.2.5.2 country; 2.2.5.3 type of source (stationary combustion, process, fugitive); 2.2.5.4 type of activity.

Guidance for Disclosure 305-1

Direct (Scope 1) GHG emissions include, but are not limited to, the CO₂ emissions from the fuel consumption as reported in Disclosure 302-1 of GRI 302: Energy 2016.

Direct (Scope 1) GHG emissions can come from the following sources owned or controlled by an organization:

- Generation of electricity, heating, cooling and steam: these emissions result from combustion of fuels in stationary sources, such as boilers, furnaces, and turbines – and from other combustion processes such as flaring;
- Physical or chemical processing: most of these emissions result from the manufacturing or processing of chemicals and materials, such as cement, steel, aluminum, ammonia, and waste processing;

- Transportation of materials, products, waste, workers, and passengers: these emissions result from the combustion of fuels in mobile combustion sources owned or controlled by the organization, such as trucks, trains, ships, airplanes, buses, and cars;
- Fugitive emissions: these are emissions that are not physically controlled but result from intentional or unintentional releases of GHGs. These can include equipment leaks from joints, seals, packing, and gaskets; methane emissions (e.g., from coal mines) and venting; HFC emissions from refrigeration and air conditioning equipment; and methane leakages (e.g., from gas transport).

Methodologies used to calculate the direct (Scope I) GHG emissions can include:

- direct measurement of energy source consumed (coal, gas) or losses (refills) of cooling systems and conversion to GHG (CO₂ equivalents);
- mass balance calculations;
- calculations based on site-specific data, such as for fuel composition analysis;
- calculations based on published criteria, such as emission factors and GWP rates;
- direct measurements of GHG emissions, such as continuous online analyzers;
- estimations.

If estimations are used due to a lack of default figures, the reporting organization can indicate the basis and assumptions on which figures were estimated.

For recalculations of prior year emissions, the organization can follow the approach in the 'GHG Protocol Corporate Standard'.

The chosen emission factors can originate from mandatory reporting requirements, voluntary reporting frameworks, or industry groups.

Estimates of GWP rates change over time as scientific research develops. GWP rates from the Second Assessment Report of the Intergovernmental Panel on Climate Change (IPCC) are used as the basis for international negotiations under the 'Kyoto Protocol'. Thus, such rates can be used for disclosing GHG emissions where it does not conflict with national or regional reporting requirements. The organization can also use the latest GWP rates from the most recent IPCC assessment report. The organization can combine Disclosure 305-1 with Disclosures 305-2 (energy indirect/Scope 2 GHG emissions) and 305-3 (other indirect/Scope 3 GHG emissions) to disclose total GHG emissions.

Further details and guidance are available in the 'GHG Protocol Corporate Standard'. See also references [1], [2], [12], [13], [14] and [19] in the Bibliography.

Final response

Energy indirect (Scope 2) GHG emissions

Question Code	GRI 305-2	Status	In Progress
Topic	GRI 305: Emissions 2016	Assignee	Joseph Magee-Billson
Category	Emissions & Air Quality	Reviewer	Steve Foster

Question

The reporting organization shall report the following information:

- Gross location-based energy indirect (Scope 2) GHG emissions in metric tons of CO₂ equivalent.
- If applicable, gross market-based energy indirect (Scope 2) GHG emissions in metric tons of CO₂ equivalent.
- If available, the gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all.
- Base year for the calculation, if applicable, including:
 - the rationale for choosing it;
 - emissions in the base year;
 - the context for any significant changes in emissions that triggered recalculations of base year emissions.
- Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.
- Consolidation approach for emissions; whether equity share, financial control, or operational control.
- Standards, methodologies, assumptions, and/or calculation tools used.

Compilation requirements

2.3 When compiling the information specified in Disclosure 305-2, the reporting organization shall:

- exclude any GHG trades from the calculation of gross energy indirect (Scope 2) GHG emissions;
- exclude other indirect (Scope 3) GHG emissions that are disclosed as specified in Disclosure 305-3;
- account and report energy indirect (Scope 2) GHG emissions based on the location-based method, if it has operations in markets without product or supplier-specific data;
- account and report energy indirect (Scope 2) GHG emissions based on both the location-based and market-based methods, if it has any operations in markets providing product or supplier-specific data in the form of contractual instruments.

Details

Recommendations

2.4 When compiling the information specified in Disclosure 305-2, the reporting organization should: 2.4.1 apply emission factors and GWP rates consistently for the data disclosed; 2.4.2 use the GWP rates from the IPCC assessment reports based on a 100-year timeframe; 2.4.3 select a consistent approach for consolidating direct (Scope 1) and energy indirect (Scope 2) GHG emissions, choosing from the equity share, financial control, or operational control methods outlined in the 'GHG Protocol Corporate Standard'; 2.4.4 if subject to different standards and methodologies, describe the approach to selecting them; 2.4.5 where it aids transparency or comparability over time, provide a breakdown of the energy indirect (Scope 2) GHG emissions by: 2.4.5.1 business unit or facility; 2.4.5.2 country; 2.4.5.3 type of source (electricity, heating, cooling, and steam); 2.4.5.4 type of activity.

Guidance for Disclosure 305-2

Energy indirect (Scope 2) GHG emissions include, but are not limited to, the CO₂ emissions from the generation of purchased or acquired electricity, heating, cooling, and steam consumed by an organization – disclosed as specified in Disclosure 302-1 of GRI 302: Energy 2016. For many organizations, the energy indirect (Scope 2) GHG emissions that result from the generation of purchased electricity can be much greater than their direct (Scope 1) GHG emissions.

The 'GHG Protocol Scope 2

Guidance' requires organizations to provide two distinct Scope 2 values: a location-based and a market-based value. A location-based method reflects the average GHG emissions intensity of grids on which energy consumption occurs, using mostly grid-average emission factor data. A market-based method reflects emissions from electricity that an organization has purposefully chosen (or its lack of choice). It derives emission factors from contractual instruments, which include any type of contract between two parties for the sale and purchase of energy bundled with attributes about the energy generation, or for unbundled attribute claims.

The market-based method calculation also includes the use of a residual mix, if the organization does not have specified emissions-intensity from its contractual instruments. This helps prevent double counting between consumers' market-based method figures. If a residual mix is unavailable, the organization can disclose this and use grid-average emission factors as a proxy (which can mean that the location-based and market-based are the same number until information on the residual mix is available).

The reporting organization can apply the Quality Criteria in the 'GHG Protocol Scope 2 Guidance' so that contractual instruments convey GHG emission rate claims and to prevent double counting. For recalculations of prior year emissions, the organization can follow the approach in the 'GHG Protocol Corporate Standard'. The chosen emission factors can originate from mandatory reporting requirements, voluntary reporting frameworks, or industry groups.

Estimates of GWP rates change over time as scientific research develops. GWP rates from the Second Assessment Report of the IPCC are used as the basis for international negotiations under the 'Kyoto Protocol'. Thus, such rates can be used for disclosing GHG emissions where it does not conflict with national or regional reporting requirements. The organization can also use the latest GWP rates from the most recent IPCC assessment report.

The organization can combine Disclosure 305-2 with Disclosures 305-1 (direct/Scope 1 GHG emissions) and 305-3 (other indirect/Scope 3 GHG emissions) to disclose total GHG emissions. Further details and guidance are available in the 'GHG Protocol Corporate Standard'. Details on the location-based and market-based methods are available in the 'GHG Protocol Scope 2 Guidance'.

Other indirect (Scope 3) GHG emissions

Question Code	GRI 305-3	Status	In Progress
Topic	GRI 305: Emissions 2016	Assignee	Joseph Magee-Billson
Category	Emissions & Air Quality	Reviewer	Steve Foster

Question

The reporting organization shall report the following information:

- Gross other indirect (Scope 3) GHG emissions in metric tons of CO₂ equivalent.
- If available, the gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all.
- Biogenic CO₂ emissions in metric tons of CO₂ equivalent.
- Other indirect (Scope 3) GHG emissions categories and activities included in the calculation.
- Base year for the calculation, if applicable, including:
 - the rationale for choosing it;
 - emissions in the base year;
 - the context for any significant changes in emissions that triggered recalculations of base year emissions.
- Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.
- Standards, methodologies, assumptions, and/or calculation tools used.

Compilation requirements

2.5 When compiling the information specified in Disclosure 305-3, the reporting organization shall:

2.5.1 exclude any GHG trades from the calculation of gross other indirect (Scope 3) GHG emissions;

2.5.2 exclude energy indirect (Scope 2) GHG emissions from this disclosure. Energy indirect (Scope 2) GHG emissions are disclosed as specified in Disclosure 305-2;

2.5.3 report biogenic emissions of CO₂ from the combustion or biodegradation of biomass that occur in its value chain separately from the gross other indirect (Scope 3) GHG emissions. Exclude biogenic emissions of other types of GHG (such as CH₄ and N₂O), and biogenic emissions of CO₂ that occur in the life cycle of biomass other than from combustion or biodegradation (such as GHG emissions from processing or transporting biomass).

Details

Recommendations

2.6 When compiling the information specified in Disclosure 305-3, the reporting organization should:

2.6.1 apply emission factors and GWP rates consistently for the data disclosed;

2.6.2 use the GWP rates from the IPCC assessment reports based on a 100-year timeframe;

2.6.3 if subject to different standards and methodologies, describe the approach to selecting them;

2.6.4 list other indirect (Scope 3) GHG emissions, with a breakdown by upstream and downstream categories and activities;

2.6.5 where it aids transparency or comparability over time, provide a breakdown of the other indirect (Scope 3) GHG emissions by:

2.6.5.1 business unit or facility;

2.6.5.2 country;

2.6.5.3 type of source;

Guidance for Disclosure 305-3

Other indirect (Scope 3) GHG emissions are a consequence of an organization's activities, but occur from sources not owned or controlled by the organization. Other indirect (Scope 3) GHG emissions include both upstream and downstream emissions. Some examples of Scope 3 activities include extracting and producing purchased materials; transporting purchased fuels in vehicles not owned or controlled by the organization; and the end use of products and services.

Other indirect emissions can also come from the decomposing of the organization's waste. Process-related emissions during the manufacture of purchased goods and fugitive emissions in facilities not owned by the organization can also produce indirect emissions.

For some organizations, GHG emissions that result from energy consumption outside of the organization can be much greater than their direct (Scope 1) or energy indirect (Scope 2) GHG emissions.

The reporting organization can identify other indirect (Scope 3) GHG emissions by assessing which of its activities' emissions:

- contribute significantly to the organization's total anticipated other indirect (Scope 3) GHG emissions;
 - offer potential for reductions the organization can undertake or influence;
 - contribute to climate change-related risks, such as financial, regulatory, supply chain, product and customer, litigation, and reputational risks;
 - are deemed material by stakeholders, such as customers, suppliers, investors, or civil society;
 - result from outsourced activities previously performed in-house, or that are typically performed in-house by other organizations in the same sector;
 - have been identified as significant for the organization's sector;
 - meet any additional criteria for determining relevance, developed by the organization or by organizations in its sector.
- The organization can use the following upstream and downstream categories and activities from the 'GHG Protocol Corporate Value Chain Standard'.

Upstream categories

1. Purchased goods and services
2. Capital goods
3. Fuel- and energy-related activities (not included in Scope 1 or Scope 2)
4. Upstream transportation and distribution
5. Waste generated in operations
6. Business travel
7. Employee commuting
8. Upstream leased assets
 - Other upstream
- Downstream categories
9. Downstream transportation and distribution
10. Processing of sold products
11. Use of sold products
12. End-of-life treatment of sold products
13. Downstream leased assets
14. Franchises
15. Investments

Other downstream

For each of these categories and activities, the organization can provide a figure in CO₂ equivalent or explain why certain data are not included.

For recalculations of prior year emissions, the organization can follow the approach in the 'GHG Protocol Corporate Value Chain Standard'.

The chosen emission factors can originate from mandatory reporting requirements, voluntary reporting frameworks, or industry groups.

Estimates of GWP rates change over time as scientific research develops. GWP rates from the Second Assessment Report of the IPCC are used as the basis for international negotiations under the 'Kyoto Protocol'. Thus, such rates can be used for disclosing GHG emissions where it does not conflict with national or regional reporting requirements. The organization can also use the latest GWP rates from the most recent IPCC assessment report.

The organization can combine Disclosure 305-3 with Disclosures 305-1 (direct/Scope 1 GHG emissions) and 305-2 (energy indirect/Scope 2 GHG emissions) to disclose total GHG emissions.

Final response

GHG emissions intensity

Question Code	GRI 305-4	Status	<div><div></div>To Do</div>
Topic	GRI 305: Emissions 2016	Assignee	Joseph Magee-Billson
Category	Emissions & Air Quality	Reviewer	Steve Foster

Question

The reporting organization shall report the following information:

1. GHG emissions intensity ratio for the organization.
2. Organization-specific metric (the denominator) chosen to calculate the ratio.
3. Types of GHG emissions included in the intensity ratio; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3).
4. Gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all.

Compilation requirements

2.7 When compiling the information specified in Disclosure 305-4, the reporting organization shall:

2.7.1 calculate the ratio by dividing the absolute GHG emissions (the numerator) by the organization-specific metric (the denominator);

2.7.2 if reporting an intensity ratio for other indirect (Scope 3) GHG emissions, report this intensity ratio separately from the intensity ratios for direct (Scope 1) and energy indirect (Scope 2) emissions.

Details

Recommendations

2.8 When compiling the information specified in Disclosure 305-4, the reporting organization should, where it aids transparency or comparability over time, provide a breakdown of the GHG emissions intensity ratio by: 2.8.1 business unit or facility; 2.8.2 country; 2.8.3 type of source; 2.8.4 type of activity.

Guidance for Disclosure 305-4

Intensity ratios can be provided for, among others:

- products (such as metric tons of CO₂ emissions per unit produced);
 - services (such as metric tons of CO₂ emissions per function or per service);
 - sales (such as metric tons of CO₂ emissions per sales).
- Organization-specific metrics (denominators) can include:

- units of product;
- production volume (such as metric tons, liters, or MWh);
- size (such as m² floor space);
- number of full-time employees;
- monetary units (such as revenue or sales).

The reporting organization can report an intensity ratio for direct (Scope 1) and energy indirect (Scope 2) GHG emissions combined, using the figures reported in Disclosures 305-1 and 305-2.

Background

Intensity ratios define GHG emissions in the context of an organization-specific metric. Many organizations track environmental performance with intensity ratios, which are often called normalized environmental impact data.

GHG emissions intensity expresses the amount of GHG emissions per unit of activity, output, or any other organization-specific metric. In combination with an organization's absolute GHG emissions, reported in Disclosures 305-1, 305-2, and 305-3, GHG emissions intensity helps to contextualize the organization's efficiency, including in relation to other organizations.

Reduction of GHG emissions

Question Code	GRI 305-5	Status	 To Do
Topic	GRI 305: Emissions 2016	Assignee	Joseph Magee-Billson
Category	Emissions & Air Quality	Reviewer	Steve Foster

Question

The reporting organization shall report the following information:

1. GHG emissions reduced as a direct result of reduction initiatives, in metric tons of CO₂ equivalent.
2. Gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all.
3. Base year or baseline, including the rationale for choosing it.
4. Scopes in which reductions took place; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3).
5. Standards, methodologies, assumptions, and/or calculation tools used.

Compilation requirements

2.9 When compiling the information specified in Disclosure 305-5, the reporting organization shall:

- 2.9.1 exclude reductions resulting from reduced production capacity or outsourcing;
- 2.9.2 use the inventory or project method to account for reductions;
- 2.9.3 calculate an initiative's total reductions of GHG emissions as the sum of its associated primary effects and any significant secondary effects;
- 2.9.4 if reporting two or more Scope types, report the reductions for each separately;
- 2.9.5 report reductions from offsets separately.

Details

Recommendations

2.10 When compiling the information specified in Disclosure 305-5, the reporting organization should, if subject to different standards and methodologies, describe the approach to selecting them.

Guidance for Disclosure 305-5

The reporting organization can prioritize disclosing reduction initiatives that were implemented in the reporting period, and that have the potential to contribute significantly to reductions. The organization can describe reduction initiatives and their targets when reporting how it manages this topic.

Reduction initiatives can include:

- process redesign;
- conversion and retrofitting of equipment;
- fuel switching;
- changes in behavior;
- offsets.

The organization can report reductions disaggregated by initiatives or groups of initiatives.

This disclosure can be used in combination with Disclosures 305-1, 305-2, and 305-3 of this Standard to monitor the reduction of GHG emissions with reference to the organization's targets, or to regulations and trading systems at international or national level.


Guidance for clause 2.9.2

The inventory method compares reductions to a base year. The project method compares reductions to a baseline. Further details on these methods are available in references [15] and [16] in the Bibliography.

Guidance for clause 2.9.3

Primary effects are the elements or activities designed to reduce GHG emissions, such as carbon storage. Secondary effects are smaller, unintended consequences of a reduction initiative, including changes to production or manufacture, which result in changes to GHG emissions elsewhere.

Emissions of ozone-depleting substances (ODS)

Question Code	GRI 305-6	Status	 To Do
Topic	GRI 305: Emissions 2016	Assignee	Joseph Magee-Billson
Category	Emissions & Air Quality	Reviewer	Steve Foster

Question

The reporting organization shall report the following information:

1. Production, imports, and exports of ODS in metric tons of CFC-11 (trichlorofluoromethane) equivalent.
2. Substances included in the calculation.
3. Source of the emission factors used.
4. Standards, methodologies, assumptions, and/or calculation tools used.

Compilation requirements

2.11 When compiling the information specified in Disclosure 305-6, the reporting organization shall:

2.11.1 calculate the production of ODS as the amount of ODS produced, minus the amount destroyed by approved technologies, and minus the amount entirely used as feedstock in the manufacture of other chemicals;

[Production of ODS = ODS produced - ODS destroyed by approved technologies - ODS entirely used as feedstock in the manufacture of other chemicals]

2.11.2 exclude ODS recycled and reused.

Details

Recommendations

2.12 When compiling the information specified in Disclosure 305-6, the reporting organization should: 2.12.1 if subject to different standards and methodologies, describe the approach to selecting them; 2.12.2 where it aids transparency or comparability over time, provide a breakdown of the ODS data by: 2.12.2.1 business unit or facility; 2.12.2.2 country; 2.12.2.3 type of source; 2.12.2.4 type of activity.

Guidance for Disclosure 305-6

The reporting organization can report separate or combined data for the substances included in the calculation.

Background

Measuring ODS production, imports, and exports helps to indicate how an organization complies with legislation. This is particularly relevant if the organization produces or uses ODS in its processes, products and services and is subject to phase-out commitments. Results on ODS phase-out help to indicate the organization's position in any markets affected by regulation on ODS.

This disclosure covers the substances included in Annexes A, B, C, and E of the 'Montreal Protocol' as well as any other ODS produced, imported, or exported by an organization.

Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions

Question Code	GRI 305-7	Status	 To Do
Topic	GRI 305: Emissions 2016	Assignee	Joseph Magee-Billson
Category	Emissions & Air Quality	Reviewer	Steve Foster

Question

The reporting organization shall report the following information:

1. Significant air emissions, in kilograms or multiples, for each of the following:
 2. NOx
 1. SOx
 2. Persistent organic pollutants (POP)
 3. Volatile organic compounds (VOC)
 4. Hazardous air pollutants (HAP)
 5. Particulate matter (PM)
 6. Other standard categories of air emissions identified in relevant regulations
1. Source of the emission factors used.
2. Standards, methodologies, assumptions, and/or calculation tools used.

Compilation requirements

2.13 When compiling the information specified in Disclosure 305-7, the reporting organization shall select one of the following approaches for calculating significant air emissions:

2.13.1 Direct measurement of emissions (such as online analyzers);

2.13.2 Calculation based on site-specific data;

2.13.3 Calculation based on published emission factors;

2.13.4 Estimation. If estimations are used due to a lack of default figures, the organization shall indicate the basis on which figures were estimated.

Details

Recommendations

2.14 When compiling the information specified in Disclosure 305-7, the reporting organization should: 2.14.1 if subject to different standards and methodologies, describe the approach to selecting them; 2.14.2 where it aids transparency or comparability over time, provide a breakdown of the air emissions data by: 2.14.2.1 business unit or facility; 2.14.2.2 country; 2.14.2.3 type of source; 2.14.2.4 type of activity.

GRI 305 Management Approach

Question Code	GRI 305-M.A.	Status	<div><div></div>To Do</div>
Topic	GRI 305: Emissions 2016	Assignee	Joseph Magee-Billson
Category	Management Approach	Reviewer	Steve Foster

Question

The reporting organization shall report how it manages emissions using Disclosure 3-3 in GRI 3: Material Topics 2021.
1.2 When reporting on GHG emissions targets, the reporting organization shall explain whether offsets were used to meet the targets, including the type, amount, criteria or scheme of which the offsets are part.

Details

The reporting organization can also:

- explain whether it is subject to any country, regional, or industry-level emissions regulations and policies; and provide examples of these regulations and policies;
- disclose expenditures on treatment of emissions (such as expenditures for filters, agents) and for the purchase and use of emissions certificates.

GRI 405: Diversity and Equal Opportunity 2016

Diversity of governance bodies and employees

Question Code	GRI 405-1	Status	In Progress
Topic	GRI 405: Diversity and Equal Opportunity 2016	Assignee	Joseph Magee-Billson
Category	Human Capital (employment, training & diversity)	Reviewer	Steve Foster

Question

The reporting organization shall report the following information:

1. Percentage of individuals within the organization's governance bodies in each of the following diversity categories:
2. Gender;
 1. Age group: under 30 years old, 30-50 years old, over 50 years old;
 2. Other indicators of diversity where relevant (such as minority or vulnerable groups).
1. Percentage of employees per employee category in each of the following diversity categories:
2. Gender;
 1. Age group: under 30 years old, 30-50 years old, over 50 years old;
 2. Other indicators of diversity where relevant (such as minority or vulnerable groups).

Details

Recommendations

2.1 When compiling the information specified in Disclosure 405-1, the reporting organization should use data from Disclosure 2-7 in GRI 2: General Disclosures 2021 to identify the total number of employees.

Guidance for Disclosure 405-1

Examples of governance bodies that exist within an organization can be the board of directors, management committee, or a similar body for a non-corporate organization.

An organization can identify any other indicators of diversity used in its own monitoring and recording that are relevant for reporting.

Background

This disclosure provides a quantitative measure of diversity within an organization and can be used in conjunction with sectoral or regional benchmarks. Comparisons between broad employee diversity and management team diversity offer information on equal opportunity. Information reported in this disclosure also helps in assessing which issues can be of particular relevance to certain segments of the governance bodies or employees.

Methodology

This data is captured in Envizi for annual reporting. Run the [CSR PowerReport](#) within Envizi and have it reviewed by Anne Spencer and her team in HR prior to finalizing the answer.

Final response

Percentage of individuals within the Board of Directors in each of the following diversity categories

	2020	2021
Male	69%	69.5%
Female	31%	30.5%
30-50	32%	29%
Over 50	68%	71%

We live inclusion of diversity, so that all employees are part of our team. Therefore, a different indicator for minorities is not a steering-relevant parameter for us.

Ratio of basic salary and remuneration of women to men

Question Code	GRI 405-2	Status	 To Do
Topic	GRI 405: Diversity and Equal Opportunity 2016	Assignee	Joseph Magee-Billson
Category	Human Capital (employment, training & diversity)	Reviewer	Steve Foster

Question

The reporting organization shall report the following information:

1. Ratio of the basic salary and remuneration of women to men for each employee category, by significant locations of operation.
2. The definition used for 'significant locations of operation'.

Details

Recommendations

2.2 When compiling the information specified in Disclosure 405-2, the reporting organization should base remuneration on the average pay of each gender grouping within each employee category.

Guidance for Disclosure 405-2

The reporting organization can draw from the information used for Disclosure 405-1 to identify the total number of employees in each employee category by gender.

Background

An organization can take an active role in reviewing its operations and decisions, in order to promote diversity, eliminate gender bias, and support equal opportunity. These principles apply equally to recruitment, opportunities for advancement, and remuneration policies. Equality of remuneration is also an important factor in retaining qualified employees.

SASB

Activity Metric

Licenses and subscriptions

Question Code	TC-SI-000.A	Status	<div><div></div>In Progress</div>
Topic	Activity Metric	Assignee	Dan McCallum
Category	Business Overview	Reviewer	Steve Foster

Question

(1) Number of licenses or subscriptions, (2) percentage cloud-based

Processing capacity

Question Code	TC-SI-000.B	Status	<div><div></div>In Progress</div>
Topic	Activity Metric	Assignee	Dan McCallum
Category	Business Overview	Reviewer	Steve Foster

Question

(1) Data processing capacity, (2) percentage outsourced

Details

Note to TC-SI-000.B - Data processing capacity shall be reported in units of measure typically tracked by the entity or used as the basis for contracting software and IT services, such as Million Service Units (MSUs), Million Instructions per Second (MIPS), Mega Floating- Point Operations per Second (MFLOPS), compute cycles, or other. Alternatively, the entity may disclose owned and outsourced data processing needs in other units of measure, such as rack space or data center square footage. The percentage outsourced shall include On-Premise cloud services, those that are hosted on Public Cloud, and those that are residing in Colocation Data Centers.

Data storage

Question Code	TC-SI-000.C	Status	<div><div></div>In Progress</div>
Topic	Activity Metric	Assignee	Dan McCallum
Category	Business Overview	Reviewer	Steve Foster

Question

(1) Amount of data storage, (2) percentage outsourced

Details

Note to TC-SI-000.C - The percentage outsourced shall include On-Premise cloud services, those that are hosted on Public Cloud, and those that are residing in Colocation Data Centers.

Environmental Footprint of Hardware Infrastructure

Energy consumption

Question Code	TC-SI-130a.1	Status	Ready For Review
Topic	Environmental Footprint of Hardware Infrastructure	Assignee	Bob Demo
Category	Energy Management	Reviewer	Evan Hearn

Question

(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable

Details

1. The entity shall disclose (1) the total amount of energy it consumed as an aggregate figure, in gigajoules (GJ).
 - 1.1. The scope of energy consumption includes energy from all sources, including energy purchased from sources external to the entity and energy produced by the entity itself (self-generated). For example, direct fuel usage, purchased electricity, and heating, cooling, and steam energy are all included within the scope of energy consumption.
 - 1.2. The scope of energy consumption includes only energy directly consumed by the entity during the reporting period.
 - 1.3. In calculating energy consumption from fuels and biofuels, the entity shall use higher heating values (HHV), also known as gross calorific values (GCV), which are directly measured or taken from the Intergovernmental Panel on Climate Change (IPCC), the U.S. Department of Energy (DOE), or the U.S. Energy Information Administration (EIA).
2. The entity shall disclose (2) the percentage of energy it consumed that was supplied from grid electricity.
 - 2.1. The percentage shall be calculated as purchased grid electricity consumption divided by total energy consumption.
3. The entity shall disclose (3) the percentage of energy it consumed that is renewable energy.
 - 3.1. Renewable energy is defined as energy from sources that are replenished at a rate greater than or equal to their rate of depletion, such as geothermal, wind, solar, hydro, and biomass.
 - 3.2. The percentage shall be calculated as renewable energy consumption divided by total energy consumption.
 - 3.3. The scope of renewable energy includes renewable fuel the entity consumed, renewable energy the entity directly produced, and renewable energy the entity purchased, if purchased through a renewable power purchase agreement (PPA) that explicitly includes renewable energy certificates (RECs) or Guarantees of Origin (GOs), a Green-e Energy Certified utility or supplier program, or other green power products that explicitly include RECs or GOs, or for which Green-e Energy Certified RECs are paired with grid electricity.
 - 3.3.1. For any renewable electricity generated on-site, any RECs and GOs must be retained (i.e., not sold) and retired or cancelled on behalf of the entity in order for the entity to claim them as renewable energy.
 - 3.3.2. For renewable PPAs and green power products, the agreement must explicitly include and convey that RECs and GOs be retained or replaced and retired or cancelled on behalf of the entity in order for the entity to claim them as renewable energy.
 - 3.3.3. The renewable portion of the electricity grid mix that is outside of the control or influence of the entity is excluded from the scope of renewable energy.
 - 3.4. For the purposes of this disclosure, the scope of renewable energy from hydro and biomass sources is limited to the following:
 - 3.4.1. Energy from hydro sources is limited to those that are certified by the Low Impact Hydropower Institute or that are eligible for a state Renewable Portfolio Standard;
 - 3.4.2. Energy from biomass sources is limited to materials certified to a third-party standard (e.g., Forest Stewardship Council, Sustainable Forest Initiative, Programme for the Endorsement of Forest Certification, or American Tree Farm System), materials considered eligible sources of supply according to the [Green-e Framework for Renewable Energy C](#)

[certification, Version 1.0](#) or Green-e regional standards, and/or materials that are eligible for an applicable state renewable portfolio standard.

4. The entity shall apply conversion factors consistently for all data reported under this disclosure, such as the use of HHVs for fuel usage (including biofuels) and conversion of kilowatt hours (kWh) to GJ (for energy data including electricity from solar or wind energy).
5. The entity may disclose the trailing twelve-month (TTM) weighted average power usage effectiveness (PUE) for its data centers.
 - 5.1. PUE is defined as the ratio of the total amount of power used by a computer data center facility to the amount of power delivered to computing equipment.
 - 5.2. If disclosing PUE, the entity shall follow the guidance and calculation methodology described in [PUE: A Comprehensive Examination of the Metric](#) (2014), published by ASHRAE and The Green Grid Association.

Methodology

This is our first year responding to this data, and we have used the broader Envizi platform.

In future, we need to use previous years to assess trend analysis, and as such should also include previous year's final responses in our answer.

Final response

1. 9,871,019 kWh
2. 87%
3. 41%

Water use

Question Code	TC-SI-130a.2	Status	In Progress
Topic	Environmental Footprint of Hardware Infrastructure	Assignee	Joseph Magee-Billson
Category	Energy Management	Reviewer	Steve Foster

Question

(1) Total water withdrawn, (2) total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress

Details

- The entity shall disclose the amount of water, in thousands of cubic meters, that was withdrawn from all sources.
 - Water sources include surface water (including water from wetlands, rivers, lakes, and oceans), groundwater, rainwater collected directly and stored by the entity, and water and wastewater obtained from municipal water supplies, water utilities, or other entities.
- The entity may disclose portions of its supply by source if, for example, significant portions of withdrawals are from non-freshwater sources.
 - Fresh water may be defined according to the local laws and regulations where the entity operates. Where there is no legal definition, fresh water shall be considered to be water that has less than 1,000 parts per million of dissolved solids per the [U.S. Geological Survey](#).
 - Water obtained from a water utility in compliance with [U.S. National Primary Drinking Water Regulations](#) can be assumed to meet the definition of fresh water.
- The entity shall disclose the amount of water, in thousands of cubic meters, that was consumed in its operations.
 - Water consumption is defined as:
 - Water that evaporates during withdrawal, usage, and discharge;
 - Water that is directly or indirectly incorporated into the entity's product or service;
 - Water that does not otherwise return to the same catchment area from which it was withdrawn, such as water returned to another catchment area or the sea.
- The entity shall analyze all of its operations for water risks and identify activities that withdraw and consume water in locations with High (40-80 percent) or Extremely High (>80 percent) Baseline Water Stress as classified by the World Resources Institute's (WRI) Water Risk Atlas tool, [Aqueduct](#).
- The entity shall disclose its water withdrawn in locations with High or Extremely High Baseline Water Stress as a percentage of the total water withdrawn.
- The entity shall disclose its water consumed in locations with High or Extremely High Baseline Water Stress as a percentage of the total water consumed.

Methodology

To withdraw the required quantitative data, we have used the attached PowerReport.

In the annual report into which this data will be put, we also include a variety of other metrics around water use. To simplify the reporting process I have included these below.

Furthermore, I have included our policy around water use. This governs both **procurement** of water, **site selection**, and policies around broader **water use**. Please find this attached.

Stakeholders Engaged

- **Morgan Bates** (Morgan.Bates@demo.com) helps track water use around the company using the Envizi platform.
- **Stuart Fielding** (Stuart.Fielding@demo.com) is in charge of new operating site selection as we grow, with a focus on due diligence for locations (including assessing water stress).
- **Merryn Hechem** (Merryn.Hechem@demo.com) is in charge of community investment, including helping alleviate water stress globally.

Final response

Required SASB Metrics

1. 91,011 L with 32% from water stressed areas.
2. 71,090 L with 43% from water stressed areas.

Other Quantitative Metrics

- Our water use per operating site (L/site): 1,631
- Percentage change in total water use from 2015 baseline: 37%
- Investment in water saving and desalination in water stressed regions: \$12,011

Integration of environmental considerations into data centers

Question Code	TC-SI-130a.3	Status	In Progress
Topic	Environmental Footprint of Hardware Infrastructure	Assignee	Joseph Magee-Billson
Category	Energy Management	Reviewer	Steve Foster

Question

Discussion of the integration of environmental considerations into strategic planning for data center needs

Details

1. The entity shall describe its approach to the integration of environmental considerations, including energy and water use, into strategic planning for data centers.
2. Discussion shall include, but is not limited to, how environmental factors impact the entity's decisions regarding the siting, design, construction, refurbishment, and operations of data centers.
 - 2.1. Environmental factors and criteria may include, but are not limited to:
 - 2.1.1. Location-based environmental factors, such as regional humidity, average temperature, and water availability.
 - 2.1.2. Environmental regulations, such as energy efficiency standards and national- or state-level carbon legislation on pricing, and carbon intensity of grid electricity.
3. The scope of disclosure includes considerations for existing owned data centers, development of new data centers, and outsourcing of data center services, where relevant.

Methodology

In 2017, in consultation with consultants, we built a policy pertaining to data centers, in line with the RE100 goals. This policy is likely to remain consistent year on year.

Final response

Please see the attached below.

Data Privacy & Freedom of Expression

Behavioral advertising and user privacy policies

Question Code	TC-SI-220a.1	Status	Ready For Review
Topic	Data Privacy & Freedom of Expression	Assignee	Steve Foster
Category	Customer Privacy	Reviewer	Steve Foster

Question

Description of policies and practices relating to behavioral advertising and user privacy


Details

1. The entity shall describe the nature, scope, and implementation of its policies and practices related to user privacy, with a specific focus on how it addresses the collection, usage, and retention of user information.
 - 1.1. User information includes information that pertains to a user's attributes or actions, including but not limited to, account statements, transaction records, records of communications, content of communications, demographic data, behavioral data, location data, and/or personally identifiable information (PII).
 - 1.2. Demographic data are defined as the quantifiable statistics that identify and distinguish a given population. Examples of demographic data include gender, age, race/ethnicity, knowledge of languages, disabilities, mobility, home ownership, and employment status.
 - 1.3. Behavioral data are defined as the product of tracking, measuring, and recording individual behaviors, such as online browsing patterns, buying habits, brand preferences, and product usage patterns.
 - 1.4. Location data are defined as data describing the physical location or movement patterns of an individual, such as Global Positioning System (GPS) coordinates or other related data that would enable identifying and tracking an individual's physical location.
 - 1.5. PII is defined as any information about an individual that is maintained by an entity, including (1) any information that can be used to distinguish or trace an individual's identity, such as name, Social Security Number (SSN), date and place of birth, mother's maiden name, or biometric records; and (2) any other information that is linked or linkable to an individual, such as medical, educational, financial, and employment information. This definition is derived from the U.S. Government Accountability Office's Report to Congressional Requesters, [Alternatives Exist for Enhancing Protection of Personally Identifiable Information](#).
2. The entity shall describe the information "lifecycle" (i.e., collection, usage, retention, processing, disclosure, and destruction of information) and how information-handling practices at each stage may affect individuals' privacy.
 - 2.1. With respect to data collection, it may be relevant for the entity to discuss which data or types of data are collected without the consent of an individual, which require opt-in consent, and which require opt-out action from the individual.
 - 2.2. With respect to usage of data, it may be relevant for the entity to discuss which data or types of data are used by the entity internally, and under which circumstances the entity shares, sells, rents, or otherwise distributes data or information to third parties.
 - 2.3. With respect to retention, it may be relevant for the entity to discuss which data or types of data it retains, the length of time of retention, and practices used to ensure that data is stored securely.
3. The entity shall discuss the degree to which its policies and practices address similar issues as those outlined in the U.S. Office of Management and Budget's (OMB) ["Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002 \(M-03-22\)"](#), including use of Privacy Impact Assessments (PIAs).
 - 3.1. A PIA is an analysis of how information is handled that ensures handling conforms to applicable legal, regulatory, and policy requirements regarding privacy; determines the risks and effects of collecting, maintaining, and disseminating

information in identifiable form in an electronic information system; and examines and evaluates protections and alternative processes for handling information in order to mitigate potential privacy risks.

- 3.2. As outlined by OMB M-03-22, PIAs must analyze and describe: (a) what information is to be collected, (b) why the information is being collected, (c) the intended use of the information, (d) with whom the information will be shared, (e) what opportunities individuals have to decline to provide information (i.e., where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), including how individuals can grant consent, and (f) how the information will be secured, among other government-specific requirements.
4. The entity shall discuss how its policies and practices related to privacy of user information address children's privacy, which at a minimum includes the provisions of the U.S. Children's Online Privacy Protection Act (COPPA).
5. The scope of disclosure includes both first- and third-party advertising.
6. With respect to behavioral advertising, the entity may describe how it addresses the following principles, described by the cross-industry Self-Regulatory Principles for Online Behavioral Advertising:
 - 6.1. Education: participation in educational efforts for consumers about behavioral online advertising
 - 6.2. Transparency: clearly disclosing information about data collection and data use practices
 - 6.3. Consumer control: allowing users to choose whether data is collected or transferred to non-affiliates
 - 6.4. Data security: providing basic security provisions and having clear policies relating to retention of user information
 - 6.5. Material changes: obtaining consent before applying changes to policies that are less restrictive than existing ones
 - 6.6. Sensitive data: abiding by COPPA, and handling user data such as financial information, Social Security numbers, and medical information
 - 6.7. Accountability: participation in self-regulatory organizations such as the Direct Marketing Association

Countries where products are subjected to oversight or censorship

Question Code	TC-SI-220a.5	Status	 To Do
Topic	Data Privacy & Freedom of Expression	Assignee	Steve Foster
Category	Customer Privacy	Reviewer	Steve Foster

Question

List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring

Details

1. The entity shall disclose a list of the countries where its products and services are monitored, blocked, or content is filtered or censored due to governmental, judicial, or law enforcement requests or requirements, where:
 - 1.1. Monitoring occurs when a government authority or law enforcement agency has routine access to content or non-content data of specific users or of all users of a particular product or service.
 - 1.2. Blocking occurs when the entity is prohibited by law or government authority from providing some or all of the entity's products or services in a country.
 - 1.3. Content filtering or censoring occurs when a government authority alters access to, or display of, content of a product or service either directly by overriding service provision, or indirectly by requiring that a company remove certain content. Examples include content that is considered politically or culturally sensitive.
2. The scope of this disclosure includes company operations that have been discontinued, or were never offered, in a region due to government activity related to monitoring, blocking, content filtering, or censoring.

Note to TC-SI-220a.5

1. The entity shall describe the extent of monitoring, blocking, content filtering, or censorship across its product or service lines, including the specific products affected, nature and duration of impact, and percent of customers affected.
2. The entity may discuss implications of blocking or censorship, such as affecting ability to grow market share, or increased costs to comply with these restrictions.
3. For products and services that have been modified in a manner material to their functionality, the entity shall identify the product or service affected and discuss the nature of the modification, indicating whether modification was undertaken to avoid monitoring or blocking, or to enable monitoring or blocking. The entity shall describe how the modified product or service differs from the product or service offering in its home country or other significant markets.
4. Where relevant, the entity shall discuss its policies and practices related to freedom of expression, including how they influence its decision making when operating in countries that may request or require some form of monitoring, blocking, content filtering, or censoring of the entity's content.

Data Security

Data breaches and details

Question Code	TC-SI-230a.1	Status	In Progress
Topic	Data Security	Assignee	Joseph Magee-Billson
Category	Data Security	Reviewer	Steve Foster

Question

(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of users affected

Details

- The entity shall calculate and disclose (1) the total number of data breaches identified during the reporting period.
 - Data breach is defined as the unauthorized movement or disclosure of sensitive information to a party, usually outside the organization, that is not authorized to have or see the information. This definition is derived from the [U.S. National Initiative for Cybersecurity Careers and Studies \(NICCS\) glossary](#).
 - The scope of disclosure is limited to data breaches that resulted in a deviation from the entity's expected outcomes for confidentiality and/or integrity.
- The entity shall disclose (2) the percentage of data breaches in which personally identifiable information (PII) was subject to the data breach.
 - PII is defined as any information about an individual that is maintained by an entity, including: (1) any information that can be used to distinguish or trace an individual's identity, such as name, Social Security Number (SSN), date and place of birth, mother's maiden name, or biometric records; and (2) any other information that is linked or linkable to an individual, such as medical, educational, financial, and employment information. This definition is derived from the U.S. Government Accountability Office's Report to Congressional Requesters, [Alternatives Exist for Enhancing Protection of Personally Identifiable Information](#).
 - The scope of disclosure shall include incidents in which encrypted data were acquired with an encryption key that was also acquired, as well as if there is a reasonable belief that encrypted data could be readily converted to plaintext.
 - Encryption is defined as the process of transforming plaintext into ciphertext. This definition is derived from the [NICCS glossary](#).
 - The scope of disclosure is limited to breaches in which users were notified of the breach, either as required by law or voluntarily by the entity.
- The entity shall disclose (3) the total number of unique users who were affected by data breaches, which includes all those whose personal data was compromised in a data breach.
 - Accounts that the entity cannot verify as belonging to the same user shall be disclosed separately.
- The entity may delay disclosure if a law enforcement agency has determined that notification impedes a criminal investigation or until the law enforcement agency determines that such notification does not compromise the investigation.

Note to TC-SI-230a.1

- The entity shall describe the corrective actions taken in response to data breaches, such as changes in operations, management, processes, products, business partners, training, or technology.
 - The U.S. SEC's [Commission Statement and Guidance on Public Company Cybersecurity Disclosures](#) may provide further guidance on disclosures on the corrective actions taken in response to data breaches
- All disclosure shall be sufficient such that it is specific to the risks the entity faces, but disclosure itself will not compromise the entity's ability to maintain data privacy and security

3. The entity may disclose its policy for disclosing data breaches to affected users in a timely manner.


Methodology

While the total number of data breaches is confidential, we have collaborated with our Compliance team to formulate a public-facing document around how we address such threats.

Final response

Our approach is best exemplified through a case study from a potential data breach threat in our Laos office, as well as our policy on the matter, which is attached in the link below.

Approach to data security risks

Question Code	TC-SI-230a.2	Status	 To Do
Topic	Data Security	Assignee	Joseph Magee-Billson
Category	Data Security	Reviewer	Steve Foster

Question

Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards


Details

1. The entity shall describe its approach to identifying vulnerabilities in its information systems that pose a data security risk.
 - 1.1. Vulnerability is defined as a weakness in an information system, system security procedures, internal controls, and/or implementation that could be exploited.
 - 1.2. Data security risk is defined as any circumstance or event with the potential to adversely impact organizational operations (including mission, functions, image, or reputation), organizational assets, individuals, other organizations, or nations through an information system via unauthorized access, destruction, disclosure, modification of information, and/or denial of service.
2. The entity shall describe its approach to addressing data security risks and vulnerabilities it has identified, including, but not limited to, operational procedures, management processes, structure of products, selection of business partners, employee training, and use of technology.
3. The entity shall describe its use of third-party cybersecurity risk management standards.
 - 3.1. Third-party cybersecurity risk management standards are defined as standards, frameworks, and/or guidance developed by a third-party with the explicit purpose of aiding companies in identifying cybersecurity threats, and/or preventing, responding to, and/or remediating cybersecurity incidents.
 - 3.2. Examples of third-party cybersecurity risk management standards include, but are not limited to:
 - 3.2.1. The American Institute of Certified Public Accountants' (AICPA) Service Organization Controls (SOC) for Cybersecurity
 - 3.2.2. ISACA's COBIT 5
 - 3 ISO/IEC 27000-series
 - 3.2.1. National Institute of Standards and Technology's (NIST) [Framework for Improving Critical Infrastructure Cybersecurity, Version 1.1](#)
 - 3.3. Disclosure shall include, but is not limited to:
 - 3.3.1. Identification of the specific cybersecurity risk management standard (s) that have been implemented or are otherwise in use
 - 3.3.2. Description of the extent of its use of cybersecurity risk management standard (s), such as by applicable operations, business unit, geography, product, or information system
 - 3.3.3. The role of cybersecurity risk management standards in the entity's overall approach to identifying vulnerabilities in its information systems and addressing data security risks and vulnerabilities
 - 3.3.4. If the third-party verification of the use of cybersecurity risk management standards is conducted, including independent examinations or audits
 - 3.3.5. Ongoing activities and initiatives related to increasing the use of cybersecurity risk management standards, even if such standards are not currently in use
4. The entity may discuss trends it has observed in type, frequency, and origination of attacks to its data security and information systems.
5. The U.S. SEC's [Commission Statement and Guidance on Public Company Cybersecurity Disclosures](#) may provide further guidance on disclosures on the entity's approach to addressing data security risks and vulnerabilities.

6. All disclosure shall be sufficient such that it is specific to the risks the entity faces but disclosure itself would not compromise the entity's ability to maintain data privacy and security.

Recruiting & Managing a Global, Diverse & Skilled Workforce

Employees that are foreign nationals and/or offshore

Question Code	TC-SI-330a.1	Status	 To Do
Topic	Recruiting & Managing a Global, Diverse & Skilled Workforce	Assignee	Joseph Magee-Billson
Category	Employee Engagement, Diversity, and Inclusion	Reviewer	Steve Foster

Question

Percentage of employees that are (1) foreign nationals and (2) located offshore

Details

1. The entity shall disclose (1) the percentage of employees that are foreign nationals.
 - 1.1. Foreign nationals are defined as anyone requiring a employment visa for work in the country in which he or she is employed.
 - 1.2. The percentage shall be calculated as the number of employees that are foreign nationals divided by the total number of the entity's employees.
2. The entity shall disclose (2) the percentage of employees that are located offshore from the entity's country of domicile, by region.
 - 2.1. The percentage shall be calculated as the number of employees that are located offshore from the entity's country of domicile divided by the total number of the entity's employees.


Note to TC-SI-330a.1

1. The entity shall describe potential risks from recruiting foreign nationals and/or offshore employees, which may arise from immigration, naturalization, or visa regulations; loss of control; threats to intellectual property; or cultural or political sensitivities
2. The entity shall describe management's approach to addressing the risks it has identified related to recruiting foreign nationals, which may including developing local talent pools, political lobbying for immigration reform, outsourcing of operations, or joining or forming industry partnerships.
3. The entity shall describe management's approach to addressing the additional risks it has identified related to conducting offshore business activities, which may include implementing safeguards for data security, piracy, and IP protection and diversifying the locations of offshore operations.

SFDR

Greenhouse gas emissions

GHG emissions

Question Code	SFDR.1	Status	 To Do
Topic	Greenhouse gas emissions	Assignee	Joseph Magee-Billson
Category	GHG Emissions	Reviewer	Steve Foster

Question

Scope 1,2,3 and Total GHG emissions


Details

'Scope 1, 2 and 3 GHG emissions' means the scope of greenhouse gas emissions referred to in subpoints (i) to (iii) of point (1)(e) of Annex III of Regulation (EU) 2016/1011.

'Greenhouse gas (GHG) emissions' means greenhouse gas emissions as defined in point (1) of Article 3 of Regulation (EU) 2018/842 of the European Parliament and of the Council.

Calculated as: $\sum (\text{Current value of investment/investee company's enterprise value} \times \text{investee company's Scope(x) GHG emissions})$

Carbon footprint

Question Code	SFDR.2	Status	 To Do
Topic	Greenhouse gas emissions	Assignee	Joseph Magee-Billson
Category	GHG Emissions	Reviewer	Steve Foster

Question

Carbon footprint

Details

'Scope 1, 2 and 3 GHG emissions' means the scope of greenhouse gas emissions referred to in subpoints (i) to (iii) of point (1)(e) of Annex III of Regulation (EU) 2016/1011.

'Greenhouse gas (GHG) emissions' means greenhouse gas emissions as defined in point (1) of Article 3 of Regulation (EU) 2018/842 of the European Parliament and of the Council.

Calculated as: $(\sum (\text{current value of investment} / \text{investee company's enterprise value}) \times (\text{investee company's Scope 1, 2 and 3 GHG emissions})) / \text{current value of all investments (€M)}$

GHG intensity of investee companies

Question Code	SFDR.3	Status	<div><div></div>To Do</div>
Topic	Greenhouse gas emissions	Assignee	Joseph Magee-Billson
Category	GHG Emissions	Reviewer	Steve Foster

Question

GHG intensity of investee companies

Details

'Scope 1, 2 and 3 GHG emissions' means the scope of greenhouse gas emissions referred to in subpoints (i) to (iii) of point (1)(e) of Annex III of Regulation (EU) 2016/1011.

'Greenhouse gas (GHG) emissions' means greenhouse gas emissions as defined in point (1) of Article 3 of Regulation (EU) 2018/842 of the European Parliament and of the Council.

Calculated as: $\sum ((\text{current value of investment} / \text{current value of all investments (€M)}) \times (\text{investee company's Scope 1, 2, and 3 GHG emissions} / \text{investee company's €M revenue}))$

Exposure to companies active in the fossil fuel sector

Question Code	SFDR.4	Status	<div><div></div>To Do</div>
Topic	Greenhouse gas emissions	Assignee	Joseph Magee-Billson
Category	GHG Emissions	Reviewer	Steve Foster

Question

Share of investments in companies active in the fossil fuel sector

Details

Companies active in the fossil fuel sector' means (i) companies that derive any revenues from exploration, mining, extraction, distribution or refining of hard coal and lignite; (ii) companies that derive any revenues from the exploration, extraction, distribution (including transportation, storage and trade) or refining of liquid fossil fuels; and (iii) companies that derive any revenues from exploring and extracting fossil gaseous fuels or from their dedicated distribution (including transportation, storage and trade);

TCFD

Governance

Board's role in managing risks and opportunities

Question Code	TCFD.Gov.RDa	Status	In Progress
Topic	Governance	Assignee	Joseph Magee-Billson
Category	Business Model Resilience	Reviewer	Steve Foster

Question

Governance Recommended Disclosure a) Describe the board's oversight of climate-related risks and opportunities.

Details

Guidance for All Sectors

In describing the board's oversight of climate-related issues, organizations should consider including a discussion of the following:

- processes and frequency by which the board and/or board committees (e.g., audit, risk, or other committees) are informed about climate-related issues;
- whether the board and/or board committees consider climate-related issues when reviewing and guiding strategy, major plans of action, risk management policies, annual budgets, and business plans as well as setting the organization's performance objectives, monitoring implementation and performance, and overseeing major capital expenditures, acquisitions, and divestitures; and
- how the board monitors and oversees progress against goals and targets for addressing climate-related issues.

Methodology

Three key stakeholders have been consulted in the formation of this response

***Anne Parsons**

***Louis Martinovic**

***Hugo McConnell**

Their work culminated in the lined document, and this should state the same year over year.

For further guidelines, or to consult on relevant changes, please refer to the above stakeholders.

Final response

See attached link and statements We have attached our SEC 10-K, filed with the SEC, as this provides a broad overview of our risks and opportunities.

Management's role in managing risks and opportunities

Question Code	TCFD.Gov.RDb	Status	In Progress
Topic	Governance	Assignee	Joseph Magee-Billson
Category	Business Model Resilience	Reviewer	Steve Foster

Question

Governance Recommended Disclosure b) Describe management's role in assessing and managing climate-related risks and opportunities.

Details

Guidance for All Sectors

In describing management's role related to the assessment and management of climate- related issues, organizations should consider including the following information:

- whether the organization has assigned climate-related responsibilities to management-level positions or committees; and, if so, whether such management positions or committees report to the board or a committee of the board and whether those responsibilities include assessing and/or managing climate-related issues;
- a description of the associated organizational structure(s);
- processes by which management is informed about climate-related issues; and
- how management (through specific positions and/or management committees) monitors climate-related issues.

Methodology

This fits into our wider risk and opportunity management strategy, attached.

Final response

Risk and opportunity management around climate change informs all aspects of our business strategy, and as a result our business' process around broader risk and opportunity accurately summarizes our approach to this. Please find this attached below.

Strategy

Identified risks and opportunities

Question Code	TCFD. Str.RDa	Status	<input type="radio"/> To Do
Topic	Strategy	Assignee	Joseph Magee-Billson
Category	Business Model Resilience	Reviewer	Steve Foster

Question

Strategy Recommended Disclosure a) Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.

Details

Guidance for All Sectors

Organizations should provide the following information:

- a description of what they consider to be the relevant short-, medium-, and long- term time horizons, taking into consideration the useful life of the organization's assets or infrastructure and the fact that climate-related issues often manifest themselves over the medium and longer terms;
- a description of the specific climate-related issues potentially arising in each time horizon (short, medium, and long term) that could have a material financial impact on the organization; and
- a description of the process(es) used to determine which risks and opportunities could have a material financial impact on the organization. Organizations should consider providing a description of their risks and opportunities by sector and/or geography, as appropriate. In describing climate-related issues, organizations should refer to [Tables A1.1](#) and [A1.2](#) (pp. 75–76).

Supplemental Guidance for Banks

Banks should describe significant concentrations of credit exposure to carbon-related assets. Additionally, banks should consider disclosing their climate-related risks (transition and physical) in their lending and other financial intermediary business activities.

Risk and opportunity impact description

Question Code	TCFD.Str.RDb	Status	 Complete
Topic	Strategy	Assignee	Joseph Magee-Billson
Category	Business Model Resilience	Reviewer	Steve Foster

Question

Strategy Recommended Disclosure b) Describe the impact of climate-related risks and opportunities on the organization

Details

Guidance for All Sectors

Building on recommended disclosure (a), organizations should discuss how identified climate-related issues have affected their businesses, strategy, and financial planning. Organizations should consider including the impact on their businesses, strategy, and financial planning in the following areas:

- Products and services.
- Supply chain and/or value chain.
- Adaptation and mitigation activities.
- Investment in research and development.
- Operations (including types of operations and location of facilities) - Acquisitions or divestments
- Access to capital. Organizations should describe how climate-related issues serve as an input to their financial planning process, the time period(s) used, and how these risks and opportunities are prioritized. Organizations' disclosures should reflect a holistic picture of the interdependencies among the factors that affect their ability to create value over time. Organizations should describe the impact of climate-related issues on their financial performance (e.g., revenues, costs) and financial position (e.g., assets, liabilities). If climate-related scenarios were used to inform the organization's strategy and financial planning, such scenarios should be described. Organizations that have made GHG emissions reduction commitments, operate in jurisdictions that have made such commitments, or have agreed to meet investor expectations regarding GHG emissions reductions should describe their plans for transitioning to a low-carbon economy, which could include GHG emissions targets and specific activities intended to reduce GHG emissions in their operations and value chain or to otherwise support the transition.

Supplemental Guidance for Insurance Companies

Insurance companies should describe the potential impacts of climate-related risks and opportunities as well as provide supporting quantitative information where available, on their core businesses, products, and services, including:

- information at the business division, sector, or geography levels;
- how the potential impacts influence client or broker selection; and
- whether specific climate-related products or competencies are under development, such as insurance of green infrastructure, specialty climate-related risk advisory services, and climate-related client engagement.

Supplemental Guidance for Asset Owners

Asset owners should describe how climate-related risks and opportunities are factored into relevant investment strategies. This could be described from the perspective of the total fund or investment strategy or individual investment strategies for various asset classes.

Supplemental Guidance for Asset Managers

Asset managers should describe how climate-related risks and opportunities are factored into relevant products or investment strategies. Asset managers should also describe how each product or investment strategy might be affected by the transition to a low-carbon economy.

Supplemental Guidance for Non-Financial Groups

Organizations should consider discussing how climate-related risks and opportunities are integrated into their (1) current decision-making and (2) strategy formulation, including planning assumptions and objectives around climate change mitigation, adaptation, or opportunities such as:

- Research and development (R&D) and adoption of new technology.
- Existing and committed future activities such as investments, restructuring, write-downs, or impairment of assets.
- Critical planning assumptions around legacy assets, for example, strategies to lower carbon-, energy-, and/or water-intensive operations.
- How GHG emissions, energy, and water and other physical risk exposures, if applicable, are considered in capital planning and allocation; this could include a discussion of major acquisitions and divestments, joint-ventures, and investments in technology, innovation, and new business areas in light of changing climate-related risks and opportunities.
- The organization's flexibility in positioning/repositioning capital to address emerging climate-related risks and opportunities.

Methodology

We do this currently on a **product by product basis**.

We do however filter it through a lens of three identified risks and opportunities, discussed in our 10K and 10Q filed with the SEC.


These are:

- Electronic vehicles
- Green metal investments
- Alternative energy sources

Final response

An overview of impact is provided through a spreadsheet attached, sorted by product

Resilience of the organization across climate-related scenarios

Question Code	TCFD.Str.RDc	Status	 Complete
Topic	Strategy	Assignee	Joseph Magee-Billson
Category	Business Model Resilience	Reviewer	Steve Foster

Question

Strategy Recommended Disclosure c) Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2 degree or lower scenario.

Details

Guidance for All Sectors

Organizations should describe how resilient their strategies are to climate-related risks and opportunities, taking into consideration a transition to a low-carbon economy consistent with a 2°C or lower scenario and, where relevant to the organization, scenarios consistent with increased physical climate-related risks. Organizations should consider discussing:

- where they believe their strategies may be affected by climate-related risks and opportunities;
- how their strategies might change to address such potential risks and opportunities;
- the potential impact of climate-related issues on financial performance (e.g., revenues, costs) and financial position (e.g., assets, liabilities) and
- the climate-related scenarios and associated time horizon(s) considered. Refer to Section D in the [Task Force's report](#) for information on applying scenarios to forward-looking analysis.

Supplemental Guidance for Insurance Companies

Insurance companies that perform climate-related scenario analysis on their underwriting activities should provide the following information

- description of the climate-related scenarios used, including the critical input parameters, assumptions and considerations, and analytical choices. In addition to a 2°C scenario, insurance companies with substantial exposure to weather-related perils should consider using a greater than 2°C scenario to account for physical effects of climate change and
- time frames used for the climate-related scenarios, including short-, medium-, and long-term milestones.

Supplemental Guidance for Asset Owners

Asset owners that perform scenario analysis should consider providing a discussion of how climate-related scenarios are used, such as to inform investments in specific assets.

Supplemental Guidance for Non-Financial Groups

Organizations with more than one billion U.S. dollar equivalent (USDE) in annual revenue should consider conducting more robust scenario analysis to assess the resilience of their strategies against a range of climate-related scenarios, including a 2°C or lower scenario and, where relevant to the organization, scenarios consistent with increased physical climate-related risks. Organizations should consider discussing the implications of different policy assumptions, macro-economic trends, energy pathways, and technology assumptions used in publicly available climate-related scenarios to assess the resilience of their strategies. For the climate-related scenarios used, organizations should consider providing information on the following factors to allow investors and others to understand how conclusions were drawn from scenario analysis:

- Critical input parameters, assumptions, and analytical choices for the climate-related scenarios used, particularly as they relate to key areas such as policy assumptions, energy deployment pathways, technology pathways, and related timing assumptions.

- Potential qualitative or quantitative financial implications of the climate-related scenarios, if any.

Methodology

Note that we do not currently use scenario analysis in our investment portfolio decisions.


We have a team investigating how this could be built in future decisions, they are led by Tom Feshina (Tom.Feshina@demo.com)

Final response

N/A

Risk Management

Process for risk and opportunity identification

Question Code	TCFD.RM.RDa	Status	 Complete
Topic	Risk Management	Assignee	Joseph Magee-Billson
Category	Business Model Resilience	Reviewer	Steve Foster

Question

Risk Management Recommended Disclosure a) Describe the organization's processes for identifying and assessing climate-related risks.

Details

Guidance for All Sectors

Organizations should describe their risk management processes for identifying and assessing climate-related risks. An important aspect of this description is how organizations determine the relative significance of climate-related risks in relation to other risks. Organizations should describe whether they consider existing and emerging regulatory requirements related to climate change (e.g., limits on emissions) as well as other relevant factors considered. Organizations should also consider disclosing the following:

- processes for assessing the potential size and scope of identified climate-related risks and
- definitions of risk terminology used or references to existing risk classification frameworks used.

Supplemental Guidance for Banks

Banks should describe significant concentrations of credit exposure to carbon-related assets. Additionally, banks should consider disclosing their climate-related risks (transition and physical) in their lending and other financial intermediary business activities.

Supplemental Guidance for Insurance Companies

Insurance companies should describe the processes for identifying and assessing climate-related risks on re-/insurance portfolios by geography, business division, or product segments, including the following risks:

- physical risks from changing frequencies and intensities of weather-related perils;
- transition risks resulting from a reduction in insurable interest due to a decline in value, changing energy costs, or implementation of carbon regulation; and
- liability risks that could intensify due to a possible increase in litigation.

Supplemental Guidance for Asset Owners

Asset owners should describe, where appropriate, engagement activity with investee companies to encourage better disclosure and practices related to climate-related risks to improve data availability and asset owners' ability to assess climate-related risks.

Supplemental Guidance for Asset Managers

Asset managers should describe, where appropriate, engagement activity with investee companies to encourage better disclosure and practices related to climate-related risks in order to improve data availability and asset managers' ability to

assess climate-related risks. Asset managers should also describe how they identify and assess material climate related risks for each product or investment strategy. This might include a description of the resources and tools used in the process.

Methodology

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Final response

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Process for climate-related risk management

Question Code	TCFD.RM.RDb	Status	 Complete
Topic	Risk Management	Assignee	Joseph Magee-Billson
Category	Business Model Resilience	Reviewer	Steve Foster

Question

Risk Management Recommended Disclosure b) Describe the organization's processes for managing climate-related risks.

Details

Guidance for All Sectors

Organizations should describe their processes for managing climate-related risks, including how they make decisions to mitigate, transfer, accept, or control those risks. In addition, organizations should describe their processes for prioritizing climate-related risks, including how materiality determinations are made within their organizations. In describing their processes for managing climate-related risks, organizations should address the risks included in [Tables A1.1](#) and [A1.2](#) (pp. 75–76), as appropriate.

Supplemental Guidance for Insurance Companies

Insurance companies should describe key tools or instruments, such as risk models, used to manage climate-related risks in relation to product development and pricing. Insurance companies should also describe the range of climate-related events considered and how the risks generated by the rising propensity and severity of such events are managed.

Supplemental Guidance for Asset Owners

Asset owners should describe how they consider the positioning of their total portfolio with respect to the transition to a low-carbon energy supply, production, and use. This could include explaining how asset owners actively manage their portfolios' positioning in relation to this transition.

Supplemental Guidance for Asset Managers

Asset managers should describe how they manage material climate-related risks for each product or investment strategy.

Organizational integration of climate-related risk processes

Question Code	TCFD.RM.RDc	Status	<div><div></div>Complete</div>
Topic	Risk Management	Assignee	Joseph Magee-Billson
Category	Business Model Resilience	Reviewer	Steve Foster

Question

Risk Management Recommended Disclosure c) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.

Details

Guidance for All Sectors

Organizations should describe how their processes for identifying, assessing, and managing climate-related risks are integrated into their overall risk management.

Metrics and Targets

Metrics used for assessment of climate-related risks and opportunities

Question Code	TCFD.MT.RDa	Status	Complete
Topic	Metrics and Targets	Assignee	Joseph Magee-Billson
Category	Business Model Resilience	Reviewer	Steve Foster

Question

Metrics and Targets Recommended Disclosure a) Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.

Details

Guidance for All Sectors

Organizations should provide the key metrics used to measure and manage climate-related risks and opportunities, as described in [Tables A1.1](#) and [A1.2](#) (pp. 75–76), as well as metrics consistent with the cross-industry, climate-related metric categories described in [Table A2.1](#) (p. 79). Organizations should consider including metrics on climate-related risks associated with water, energy, land use, and waste management where relevant and applicable. Where climate-related issues are material, organizations should consider describing whether and how related performance metrics are incorporated into remuneration policies. Where relevant, organizations should provide their internal carbon prices as well as climate-related opportunity metrics such as revenue from products and services designed for a low-carbon economy. Metrics should be provided for historical periods to allow for trend analysis. Where appropriate, organizations should consider providing forward-looking metrics for the cross-industry, climate-related metric categories described in [Tables A2.1](#) and [\[A1.2\]](#) (p. 79), consistent with their business or strategic planning time horizons. In addition, where not apparent, organizations should provide a description of the methodologies used to calculate or estimate climate-related metrics.

Supplemental Guidance for Banks

Banks should provide the metrics used to assess the impact of (transition and physical) climate-related risks on their lending and other financial intermediary business activities in the short, medium, and long term. Metrics provided may relate to credit exposure, equity and debt holdings, or trading positions, broken down by:

- Industry
- Geography
- Credit quality (e.g., investment grade or non-investment grade, internal rating system)
- Average tenor Banks should also provide the amount and percentage of carbon-related assets relative to total assets as well as the amount of lending and other financing connected with climate-related opportunities. Banks should describe the extent to which their lending and other financial intermediary business activities, where relevant, are aligned with a well below 2°C scenario, using whichever approach or metrics best suit their organizational context or capabilities. Banks should also indicate which financial intermediary business activities (e.g., loans to specific sectors or industries) are included.

Supplemental Guidance for Insurance Companies

Insurance companies should provide aggregated risk exposure to weather-related catastrophes of their property business (i.e., annual aggregated expected losses from weather-related catastrophes) by relevant jurisdiction. Insurance companies should describe the extent to which their insurance underwriting activities, where relevant, are aligned with a well below 2°C scenario, using whichever approach or metrics best suit their organizational context or capabilities. Insurance companies should also indicate which insurance underwriting activities (e.g., lines of business) are included.

Supplemental Guidance for Asset Owners

Asset owners should describe metrics used to assess climate-related risks and opportunities in each fund or investment strategy. Where relevant, asset owners should also describe how these metrics have changed over time. Where appropriate, asset owners should provide metrics considered in investment decisions and monitoring. Asset owners should describe the extent to which assets they own and their funds and investment strategies, where relevant, are aligned with a well below 2°C scenario, using whichever approach or metrics best suit their organizational context or capabilities. Asset owners should also indicate which asset classes are included.

Supplemental Guidance for Asset Managers

Asset managers should describe metrics used to assess climate-related risks and opportunities in each product or investment strategy. Where relevant, asset managers should also describe how these metrics have changed over time. Where appropriate, asset managers should provide metrics considered in investment decisions and monitoring. Asset managers should describe the extent to which their assets under management and products and investment strategies, where relevant, are aligned with a well below 2°C scenario, using whichever approach or metrics best suit their organizational context or capabilities. Asset managers should also indicate which asset classes are included.

Supplemental Guidance for Non-Financial Groups

For all relevant metrics, organizations should consider providing historical trends and forward-looking projections (by relevant country and/or jurisdiction, business line, or asset type). Organizations should also consider disclosing metrics that support their scenario analysis and strategic planning process and that are used to monitor the organization's business environment from a strategic and risk management perspective. Organizations should consider providing key metrics related to GHG emissions, energy, water and other physical risk exposures, land use, and, if relevant, investments in climate adaptation and mitigation that address potential financial aspects of shifting demand, expenditures, asset valuation, and cost of financing.

Methodology

We use Envizi for management of all our climate-related metrics.

The Sustainability Manager in charge of our use of the Envizi platform is Steve Foster (Steve.Foster@demo.com). While our current metrics are detailed below and in the attached Executive Sustainability Report, these may change over time, and Steve should be contacted before reporting the same metrics.

Final response

We currently report metrics:

- electricity
- water
- waste

as well as the GHG emissions reported in the remainder of TCFD.

Scope 1, 2 and 3 greenhouse gas emissions and related risks

Question Code	TCFD.MT.RDb	Status	● Ready For Review
Topic	Metrics and Targets	Assignee	Joseph Magee-Billson
Category	GHG Emissions	Reviewer	Steve Foster

Question

Metrics and Targets Recommended Disclosure b) Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.

Details

Guidance for All Sectors

Organizations should provide their Scope 1 and Scope 2 GHG emissions independent of a materiality assessment, and, if appropriate, Scope 3 GHG emissions and the related risks. All organizations should consider disclosing Scope 3 GHG emissions. GHG emissions should be calculated in line with the GHG Protocol methodology to allow for aggregation and comparability across organizations and jurisdictions. As appropriate, organizations should consider providing related, generally accepted industry-specific GHG efficiency ratios. GHG emissions and associated metrics should be provided for historical periods to allow for trend analysis. In addition, where not apparent, organizations should provide a description of the methodologies used to calculate or estimate the metrics.

Supplemental Guidance for Banks

Banks should disclose GHG emissions for their lending and other financial intermediary business activities where data and methodologies allow. These emissions should be calculated in line with the Global GHG Accounting and Reporting Standard for the Financial Industry developed by the Partnership for Carbon Accounting Financials (PCAF Standard) or a comparable methodology.

Supplemental Guidance for Insurance Companies

Insurance companies should disclose weighted average carbon intensity or GHG emissions associated with commercial property and specialty lines of business where data and methodologies allow.

Supplemental Guidance for Asset Owners

Asset owners should disclose GHG emissions for assets they own and the weighted average carbon intensity (WACI) for each fund or investment strategy, where data and methodologies allow. These emissions should be calculated in line with the Global GHG Accounting and Reporting Standard for the Financial Industry developed by the Partnership for Carbon Accounting Financials (PCAF Standard) or a comparable methodology (See [Table 2](#), p. 50). In addition to WACI, asset owners should consider providing other carbon foot printing metrics they believe are useful for decision-making. See [Table 3](#) (p. 52) for additional common carbon foot printing and exposure metrics.

Supplemental Guidance for Asset Managers

Asset managers should disclose GHG emissions for their assets under management and the weighted average carbon intensity (WACI) for each product or investment strategy, where data and methodologies allow. These emissions should be calculated in line with the Global GHG Accounting and Reporting Standard for the Financial Industry developed by the Partnership for Carbon Accounting Financials (PCAF Standard) or a comparable methodology (See [Table 2](#), p. 50). In addition to WACI, asset managers should consider providing other carbon foot printing metrics they believe are useful for decision-making. See [Table 3](#) (p. 52) for additional carbon foot printing and exposure metrics.

Methodology

All Scope 1, 2, and 3 data streams are captured in Envizi. Aggregate calculations are done in alignment with the GHG protocol, including application of emissions factors according the spend, average, hybrid, and supplier specific methodologies for Scope 3. For a list of emissions factors, see attached report.


Final response

Scope 1 - 74k tons of CO2

Scope 2 - 164k tons of CO2

Scope 3 - 146k tons of CO2

Targets used to manage risks and opportunities

Question Code	TCFD.MT.RDc	Status	 Complete
Topic	Metrics and Targets	Assignee	Joseph Magee-Billson
Category	Business Model Resilience	Reviewer	Steve Foster

Question

Metrics and Targets Recommended Disclosure c) Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.

Details

Guidance for All Sectors

Organizations should describe their key climate-related targets such as those related to GHG emissions, water usage, energy usage, etc., in line with the cross-industry, climate-related metric categories in [Table A2.1](#) (p. 79), where relevant, and in line with anticipated regulatory requirements or market constraints or other goals. Other goals may include efficiency or financial goals, financial loss tolerances, avoided GHG emissions through the entire product life cycle, or net revenue goals for products and services designed for a low-carbon economy. In describing their targets, organizations should consider including the following:

- whether the target is absolute or intensity based;
- time frames over which the target applies;
- base year from which progress is measured; and
- key performance indicators used to assess progress against targets. Organizations disclosing medium-term or long-term targets should also disclose associated interim targets in aggregate or by business line, where available. Where not apparent, organizations should provide a description of the methodologies used to calculate targets and measures.

Methodology

We answer this through an extract pulled from the wider Envizi platform.


Final response

See above.

UN SDGs

Zero Hunger

Ending hunger and the provision of safe, nutritious and sufficient food.

Question Code	SDG2.1	Status	 To Do
Topic	Zero Hunger	Assignee	Joseph Magee-Billson
Category	Global Equality	Reviewer	Steve Foster

Question

2.1 By 2030, end hunger and ensure access by all people, in particular the poor and people in vulnerable situations, including infants, to safe, nutritious and sufficient food all year round

Details

2.1.1

Prevalence of undernourishment

2.1.2

Prevalence of moderate or severe food insecurity in the population, based on the Food Insecurity Experience Scale (FIES)

Good Health and Well-Being

Reduction of global maternal mortality ratio.

Question Code	SDG3.1	Status	<div><div></div>To Do</div>
Topic	Good Health and Well-Being	Assignee	Steve Foster
Category	Customer Welfare	Reviewer	Steve Foster

Question

3.1 By 2030, reduce the global maternal mortality ratio to less than 70 per 100,000 live births

Details

3.1.1

Maternal mortality ratio

3.1.2

Proportion of births attended by skilled health personnel

Increasing financing for healthcare

Question Code	SDG3.c	Status	<div><div></div>To Do</div>
Topic	Good Health and Well-Being	Assignee	Steve Foster
Category	Customer Welfare	Reviewer	Steve Foster

Question

3.c Substantially increase health financing and the recruitment, development, training and retention of the health workforce in developing countries, especially in least developed countries and small island developing States

Details

3.c.1

Health worker density and distribution

Quality Education

Skills and knowledge for sustainable development

Question Code	SDG4.7	Status	In Progress
Topic	Quality Education	Assignee	Joseph Magee-Billson
Category	Global Equality	Reviewer	Steve Foster

Question

4.7 By 2030, ensure that all learners acquire the knowledge and skills needed to promote sustainable development, including, among others, through education for sustainable development and sustainable lifestyles, human rights, gender equality, promotion of a culture of peace and non-violence, global citizenship and appreciation of cultural diversity and of culture's contribution to sustainable development

Details

4.7.1

Extent to which (i) global citizenship education and (ii) education for sustainable development, including gender equality and human rights, are mainstreamed at all levels in: (a) national education policies, (b) curricula, (c) teacher education and (d) student assessment

Clean Water and Sanitation

Access to safe and affordable drinking water

Question Code	SDG6.1	Status In Progress	
Topic	Clean Water and Sanitation	Assignee	Joseph Magee-Billson
Category	Global Equality	Reviewer	Steve Foster

Question

6.1 By 2030, achieve universal and equitable access to safe and affordable drinking water for all

Details

6.1.1
Proportion of population using safely managed drinking water services

Climate Action

Integration of climate change into policies, strategies and planning.

Question Code	SDG13.2	Status	● Ready For Review
Topic	Climate Action	Assignee	Joe Baker
Category	Business Model Resilience	Reviewer	Evan Hearn

Question

13.2 Integrate climate change measures into national policies, strategies and planning

Details

13.2.1

Number of countries that have communicated the establishment or operationalization of an integrated policy/strategy/plan which increases their ability to adapt to the adverse impacts of climate change, and foster climate resilience and low greenhouse gas emissions development in a manner that does not threaten food production (including a national adaptation plan, nationally determined contribution, national communication, biennial update report or other)

Methodology

Given the emphasis within this SDG of public-private partnerships with governments, our compliance liaisons in our countries of operation have helped us complete this:

- In the United Kingdom: **Perry White**
- In Australia: **Diana May**
- In Canada: **Laura Toon**

Final response

This is best illustrated through a case study, showing how we engaged with the Department for International Development in the UK to help Laos build climate-resilient infrastructure.

Life on Land

Financing conservation and biodiversity and ecosystem protection

Question Code	SDG15.a	Status	In Progress
Topic	Life on Land	Assignee	Joseph Magee-Billson
Category	Ecological Impacts	Reviewer	Steve Foster

Question

15.a Mobilize and significantly increase financial resources from all sources to conserve and sustainably use biodiversity and ecosystems

Details

15.a.1

Official development assistance and public expenditure on conservation and sustainable use of biodiversity and ecosystems

Methodology

Please consult with **George Blair**, who heads our non-profit charity who aims to help mobilize the relevant funding.

Final response

Our policy around financing conservation is attached. We focus on providing specific protected habitats for IUCN Red List species.

Financing resources for sustainable forest management globally

Question Code	SDG15.b	Status	In Progress
Topic	Life on Land	Assignee	Joseph Magee-Billson
Category	Ecological Impacts	Reviewer	Steve Foster

Question

15.b Mobilize significant resources from all sources and at all levels to finance sustainable forest management and provide adequate incentives to developing countries to advance such management, including for conservation and reforestation

Details

15.b.1

Official development assistance and public expenditure on conservation and sustainable use of biodiversity and ecosystems

Methodology

Two policies play into this, and are thus worth including.

The first is our policy around deforestation, which we divested completely from in 2014.

The second is a policy around carbon offsets, where we invest directly in conserving and planting forests, and their relevant ecosystems.

Final response

Please see relevant attachments.

こんにちは

持続可能性

持続可能性は重要です