



NORM-BASED ENGAGEMENT



2024 Annual Report Summary

February 2025





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INTRODUCTION

This report presents the Norm-Based Engagement activities that were carried out by ISS ESG on behalf of participating institutional investors during 2024.

Under this solution, ISS ESG facilitates engagement with issuers on behalf of participating clients who would like to encourage corporate disclosure of efforts taken to manage or mitigate the environmental and social risks connected to business activities or operations. Participating clients have the option to opt in or out of each individual company engagement. *Accordingly, while this report summarises the total number of engagements carried out during 2024 by ISS ESG on behalf of the participating clients, this does not mean that each participating client was a party to all of those engagements.*

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

ISS ESG NORM-BASED ENGAGEMENT APPROACH

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

Engagement Scope

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

Engagement Process

The engagement is preceded by in-depth research and fact-finding dialogues with companies and stakeholders through ISS ESG Norm-Based Research. Once a company is identified to be involved in a relevant controversy it is considered for Norm-Based Engagement, which is conducted on a rolling quarterly basis. Through these feasibility studies, ISS ESG identifies gaps in company disclosure and assesses whether investor dialogue is an appropriate means to reach the goals set by the participating investors. Influential factors include an estimation of the company's level of responsibility, mitigating steps it has taken to mitigate the possible failure to respect a norm, and availability of both stakeholder and expert sources to facilitate constructive dialogue. The engagement dialogue is initiated through letters to companies, sent by ISS ESG on behalf of participating investors. Dialogue may be conducted in writing or through calls and meetings, facilitated by ISS ESG. Some companies require repeated follow-ups to respond. Should the company remain unresponsive, enquiries are escalated to the CEO and the Board. Once efforts have been made to engage both Investor Relations and a company's Executive Management, the feasibility of engagement is re-evaluated.

Engagement Outcomes

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

ENGAGEMENT STATISTICS

During 2024, ISS ESG conducted Norm-Based Engagement on behalf of participating investors with 124 companies, covering 189 individual ESG topics. The companies engaged with are domiciled across 28 different locations. For 100 of the companies, a new engagement cycle was initiated during 2024. Some 71% of the 100 companies provided responses to the investor outreach. The total number of substantial interactions in 2024 amounted to 529.

Charts 1-4: Summary charts of engagements conducted between 1 January 2024 and 31 December 2024

Chart 1

Response Rate

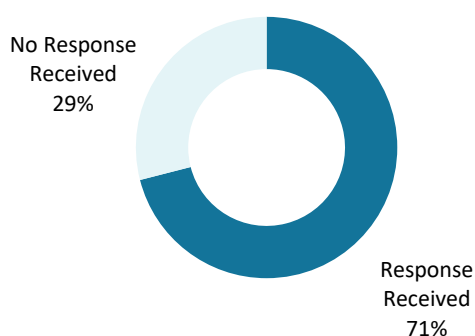


Chart 2

Norm Area Breakdown

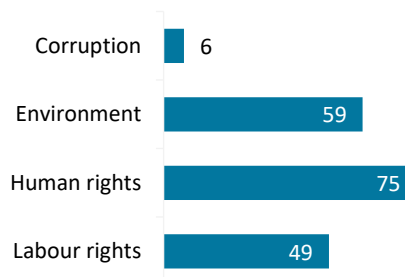


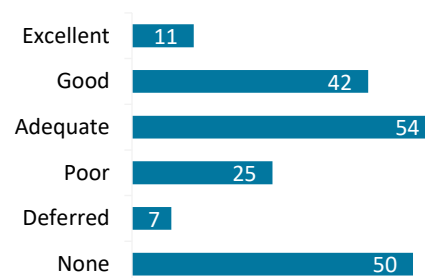
Chart 3

Substantial interactions¹

529

Chart 4

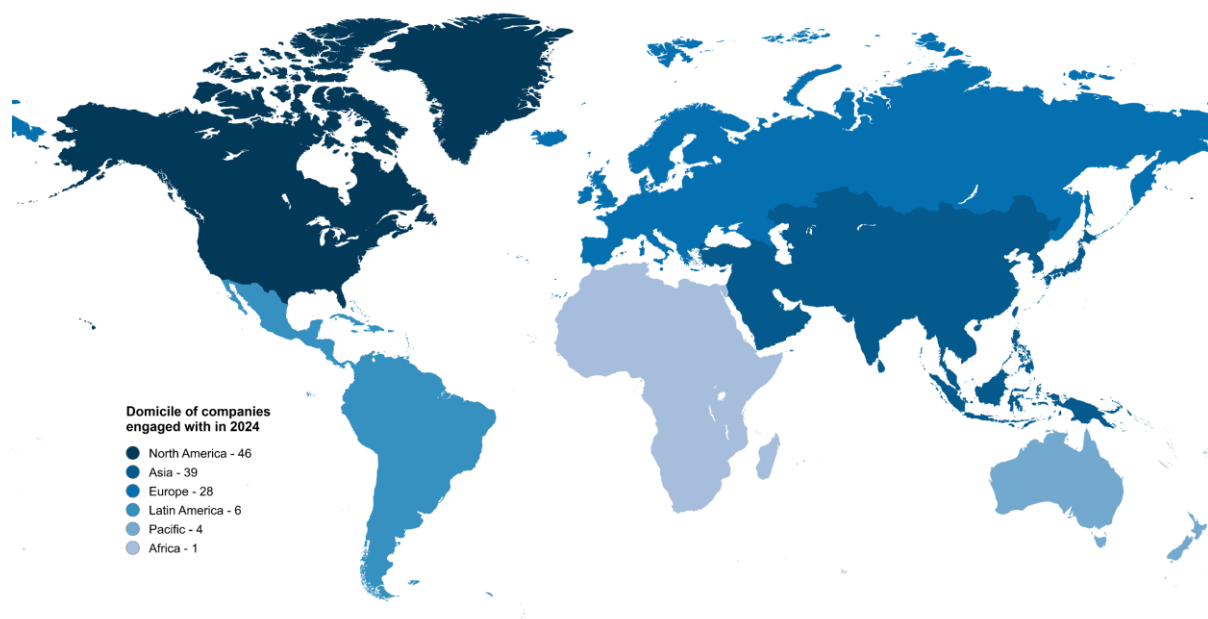
Quality of Participation²



¹ Substantial interactions with issuers consist of engagement letters, company responses in writing or through a meeting, follow-up questions as well as reminders and escalations.

² **NOTE:** Quality of participation definitions: **Excellent:** The company has replied and substantially addressed all elements of the questions. **Good:** The company has replied and addressed most elements of the questions. **Adequate:** The company has replied, but only addressed some elements of the questions posed. **Poor:** The company has replied but did not address the questions posed. **Deferred:** The company has replied, acknowledging the enquiry, but may have requested more time to respond, transferred the responsibility to another function in the company, and/or agreed to schedule a meeting in which it will provide more information. **None:** The company has not replied.

Map 1: Geographic distribution of companies engaged with in 2024



ENGAGEMENT TOPICS

In 2024, in the area of human rights, the key engagement topics were indigenous rights and standards of living, followed by consumers’ right to privacy. Forced labour was the dominant labour rights topic, followed by safe and healthy working conditions and just and favourable conditions of work. Most environment-focused engagement topics were related to corporate management of environmental impacts, pollution (air, water, and soil), and climate change. Within the area of anti-corruption, key engagement topics were anti-competitive behaviour and accounting /disclosure standards.

Table 1: Major engagement topics in 2024 (individual engagements may cover multiple topics)

UN GLOBAL COMPACT PRINCIPLES	NORM AREA	TOPIC AREA
1-2	Human Rights	Indigenous rights
		Standard of living
3-6	Labour Rights	Forced labour
		Safe and healthy working conditions
7-9	Environment	Environmental impacts
		Pollution (Air, Water, and Soil)
10	Anti-Corruption	Anti-competitive behaviour
		Accounting / disclosure standards

COMPANIES ENGAGED WITH

This section lists all companies with which ISS ESG conducted engagement activities with on behalf of participating investors during 2024. These engagements began in 2024 or a previous year.

Acciona SA	Grupo Mexico S.A.B. de C.V.
ACS, Actividades de Construccion y Servicios SA	Hankook & Company Co., Ltd.
Adani Enterprises Limited	HANKOOK TIRE & TECHNOLOGY Co., Ltd.
Aecon Group Inc.	Hawaiian Electric Industries, Inc.
Aker Solutions ASA	HD HYUNDAI Co., Ltd.
Albemarle Corporation	HD Hyundai Heavy Industries Co., Ltd.
Alphabet Inc.	HD Korea Shipbuilding & Offshore Engineering Co., Ltd.
Amgen Inc.	Hochtief AG
Anglogold Ashanti Plc	Hugo Boss AG
Anheuser-Busch InBev SA/NV	Iflytek Co., Ltd.
AntarChile SA	Imperial Metals Corporation
Apple Inc.	Jardine Cycle & Carriage Limited
ArcelorMittal SA	Jardine Matheson Holdings Ltd.
AtkinsRealis Group Inc.	JBS SA
Baker Hughes Company	JD Sports Fashion Plc
Bank of America Corporation	JinkoSolar Holding Co., Ltd.
Barrick Gold Corporation	Juventus Football Club SpA
Bharat Heavy Electricals Limited	Kinross Gold Corporation
Blackrock, Inc.	Kohls Corporation
Bollore SE	Koninklijke Philips NV
Bunge Global SA	Levi Strauss & Co.
Carrefour SA	LG Electronics, Inc.
China Gas Holdings Limited	Lyft, Inc.
China Yangtze Power Co., Ltd.	Macy's, Inc.
Chubu Electric Power Co., Inc.	Marathon Petroleum Corporation
CITIC Limited	Marubeni Corp.
Coal India Ltd.	Meituan
COFCO Sugar Holding Co. Ltd.	Meta Platforms, Inc.
Compagnie de l'Odet SE	Microsoft Corporation
Companhia de Saneamento do Parana	Mitsubishi Corp.
Daqo New Energy Corp.	Mitsui & Co., Ltd.
Electricity Generating Public Company Limited	MMG Limited
Elsewedy Electric Co.	NextEra Energy, Inc.
Empresas Copec SA	Norfolk Southern Corporation
Enbridge Inc.	NRG Energy, Inc.
Enel SpA	NTPC Limited
ENEOS Holdings, Inc.	Osaka Gas Co., Ltd.
Energy Transfer LP	Pan American Silver Corp.
ENGIE SA	Pegatron Corp.
Eni SpA	Phillips 66
EXOR NV	PT Astra Agro Lestari Tbk
Freeport-McMoRan, Inc.	PT Astra International Tbk
Golden Agri-Resources Ltd	PVH Corp.
	Red Rock Resorts, Inc.
	Rede D'Or Sao Luiz SA
	Rio Tinto Limited

Rio Tinto Plc
Robinhood Markets, Inc.
Saipem SpA
Samsung C&T Corp.
Schlumberger Limited
Seatrium Ltd.
Securitas AB
Serco Group Plc
Shandong Gold Mining Co., Ltd.
SK, Inc.
Socfinaf SA
Sojitz Corp.
Stellantis NV
STRABAG SE
Subsea 7 SA
Sumitomo Chemical Co., Ltd.
Sumitomo Corp.
Suncor Energy Inc.

Target Corporation
TC Energy Corporation
Telefonaktiebolaget LM Ericsson
Texhong International Group Limited
The AES Corporation
The Boeing Company
The Chemours Company
Uber Technologies, Inc.
Ubisoft Entertainment SA
UGI Corporation
United States Steel Corporation
Urban Outfitters, Inc.
Vale SA
Walmart Inc.
Wilmar International Limited
Woodside Energy Group Ltd.
Woolworths Group Limited

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