



# RI TRANSPARENCY REPORT

2018

Institutional Shareholder Services  
(ISS)

## About this report

This report is an export of the individual Signatory organisation responses to the PRI Service Provider Reporting Framework during the 2018 reporting period. It shows your responses to mandatory indicators, as well as responses to voluntary indicators that your organisation has agreed to make public. You will be able to access the public RI Transparency report of your organisation and that of other signatories on the [PRI website](#).

The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information. As a result, the reports can be extensive. However, to help easily locate information, there is an **Index** which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

## Understanding the Index

The Index summarises the response status for the individual indicators and modules. It can be used by stakeholders as an 'at a glance' summary of reported information and to identify particular themes or areas of interest.

All indicators within a module are presented below. The status of indicators is shown with the following symbols:

Symbol	Status
✓	The signatory has completed all mandatory parts of this indicator
☑	The signatory has completed some parts of this indicator
🔒	This indicator was not relevant for this signatory
-	The signatory did not complete any part of this indicator.
⚠	The signatory has flagged this indicator for internal review

Within the table, indicators marked in blue are mandatory to complete. Indicators marked in grey are voluntary to complete.

# Index

Organisational Overview			
Indicator	Short description	Status	Disclosure
OO 01	Basic information	✓	Public
OO 02	Reporting year	✓	Public
OO 03	Signatory category and services	✓	Public
OO 04	Other offerings/business activities	🔒	n/a
OO 05	Breakdown of ESG coverage	✓	Asset mix disclosed in OO 06
OO End		✓	-

Strategy and Governance			
Indicator	Short description	Status	Disclosure
SG 01	Responsible investment policy	✓	Public
SG 02	Publically available policies	✓	Public
SG 03	Norms used to develop policies	✓	Public
SG 04	Policy offerings to clients	✓	Public
SG 05	ESG/RI in business offerings	✓	Public
SG 06	Outsourcing of services	✓	Private
SG 07	Providing training/education	✓	Public
SG 08	Applying, advancing and promoting the PRI principles	✓	Public
SG 09	Actions taken to promote responsible investment	✓	Public
SG 10	Long term trends	✓	Public
SG 11	Interaction with asset owners	🔒	n/a
SG 12	Aligning approach with investor goals	✓	Public
SG 13	ESG recommendations not aligned with investor goals	✓	Public
SG 14	Seeking feedback from clients	✓	Public
SG 15	Managing conflicts of interest	✓	Public
SG End		✓	-

Reporting			
Indicator	Short description	Status	Disclosure
REP 01	Product type	✓	Public
REP 02	Reporting frameworks/standards/guidelines	✓	Public
REP 03	Incorporating ESG	✓	Public
REP 04	ESG in materiality analysis	✓	Public
REP 05	Assuring ESG	✓	Public
REP End		✓	-

## Active Ownership Services

Indicator	Short description	Status	Disclosure
AOS 01	Engagement and/or voting offerings	✓	Public
AOS 02	Acquiring ESG data and information	✓	Public
AOS 03	Identifying emerging ESG issues	✓	Private
AOS 04	Prioritizing engagement topics	✓	Public
AOS 05	Channels of engagement	✓	Public
AOS 06	Accessing the appropriate teams when engaging with companies	✓	Public
AOS 07	Monitoring engagements	✓	Public
AOS 08	Defining and measuring success	✓	Public
AOS 09	Companies changing practices/behavior following engagement	✓	Private
AOS 10	Engaging with policy makers and industry bodies	✓	Private
AOS 11	ESG in voting recommendations	✓	Public
AOS 12	Raising concerns with companies ahead of voting	✓	Private
AOS 13	Voting against management	✓	Public
AOS 14	Monitoring voting outcomes	✓	Public
AOS 15	Mechanisms for clients to review voting recommendations	✓	Public
AOS 16	Involvement in projects to improve voting trail and obtaining confirmation	✓	Public
AOS 17	Sharing ESG information on companies with clients	✓	Public
AOS End		✓	-

## Research and Data Provision

Indicator	Short description	Status	Disclosure
RDP 01	Product type	✓	Public
RDP 02	Sources for research and/or rating	✓	Public
RDP 03	Stakeholder input	✓	Public
RDP 04	Up-to-date assessment and ratings	✓	Public
RDP 05	Balanced research and assessment	✓	Public
RDP 06	Consistency and comparability	✓	Public
RDP 07	Emerging ESG issues and trends	✓	Private
RDP 08	Client use of outputs	✓	Private
RDP End		✓	-

# Institutional Shareholder Services (ISS)

## Reported Information

### Public version

### Organisational Overview

## PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

## Basic Information

OO 01

Mandatory

Public

Descriptive

OO 01.1

Select the location of your organisation's headquarters.

United States

OO 01.2

Indicate the number of countries in which you have offices (including your headquarters).

- 1
- 2 - 5
- 6 - 10
- 11 - 50
- >50

OO 01.3

Indicate the regions where you have offices.

- Africa/Middle East
- Asia (excluding Japan & Korea)
- Australasia
- Canada
- Continental Europe
- Japan & Korea
- Nordic
- South America
- UK & Ireland
- US

OO 01.4

Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).

FTE

1087

OO 01.5

Additional information.[OPTIONAL]

As a leader in corporate governance and responsible investment, ISS' research expertise is powered by 18 global offices, a staff of approximately 500 research and data professionals, and coverage that spans approximately 115 markets, 30,000 companies and 42,000 meetings per year worldwide.

The answer to OO 01.4 relates to YE date for reporting year (31/12/2017).

## Reporting Year

OO 02

Mandatory

Public

Descriptive

OO 02.1

Indicate the year end date for your reporting year.

31/12/2017

## Signatory category and services

OO 03

Mandatory

Public

Gateway

OO 03.1

Indicate which of the following categories reflect your core offering or main business activity:

- Reporting
- Active Ownership Services
- Advisory and Consultancy
- Research and Data Provision
- Other, specify (1)
- Other, specify(2)

OO 03.2

Indicate any other business activities that your organisation offers. Indicate whether you wish to report on these business areas.

- Reporting

Reporting

- Yes
- No
- Advisory and Consultancy
- Other, specify (3)
- Other, specify (4)
- None of the above

# Institutional Shareholder Services (ISS)

## Reported Information

### Public version

### Strategy and Governance

## PRI disclaimer

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## Responsible investment policy

SG 01

Mandatory

Public

Gateway

SG 01.1

Describe how your organisation's philosophy incorporates environmental, social and governance factors, and the link to your business offerings.

ISS has more than 30 years of experience in corporate governance, including as a full-service proxy advisor helping investors make informed voting decisions, manage the complex process of voting shares, and report votes to stakeholders and regulators. ISS provides proxy research, vote recommendations and related governance research services to institutional investors worldwide, including an end-to-end proxy-voting platform and leading compliance and risk management solutions. In addition, ISS also offers a host of bespoke and thematic research, tools for portfolio screening, corporate governance scoring solutions and a series of ESG screening tools.

ISS offers investors ESG insights into their portfolios and helps them action this intelligence. Specifically, ISS offer unique, comprehensive and actionable solutions that enable investors to DRIVE:

- Develop responsible investing policies
- Report on their ESG approaches to clients and stakeholders
- Integrate ESG into their investment decisions
- Vote in shareholder meetings
- Engage with companies on ESG issues by providing content and services that facilitate dialogue

Whether investors are managing risk, implementing an investment strategy, engaging companies to enhance RI policies and practices, ISS is an integrated service provider to meet investors' needs for investment decision-making and active ownership.

SG 01.2

Indicate whether you have internal policies that formalise the incorporation of your beliefs in your business offerings.

Yes

SG 01.3

Indicate the components/types of your internal policy

### Policy components/types

- Policy setting out our overall ESG/RI approach
- Formalised guidelines on environmental factors
- Formalised guidelines on social factors
- Formalised guidelines on corporate governance factors
- Formalised guidelines on engagement approach
- Formalised guidelines on (proxy) voting approach
- Other, specify (1)
- Other, specify (2)
- None of the above

**SG 01.4**

Indicate how these are put into practice internally across the organisation.

- Regular employee training on RI/ESG
  - Regular RI/ESG policy awareness building for employees
  - Establishment of policy review committee/team
  - Remuneration linked to achieving ESG objectives
  - Annual performance incentives
  - Other, specify (1)
  - Other, specify (2)
  - Other, specify (3)
  - Other, specify (4)
- No

**SG 01.5**

Additional information [OPTIONAL]

ISS provides comprehensive governance offerings and deep expertise in environmental and social research and analysis to deliver a fully integrated global solution for responsible investing. ISS' ESG solutions enable investors to develop and integrate responsible investing policies and practices into their strategy, and execute upon these policies including through end-to-end voting. Solutions include:

- Responsible Investment Policy Development
- ISS Research and Screening Services including: Norm-Based Research; Controversial Weapons Screening; Ethical Screens; Energy& Extractives Screens; Global Sanctions Screening; Pooled Engagement
- Climate Data, Analytics and Advisory
- Environment& Social QualityScore
- Custom Screening and Ratings

ISS offers expertise across a full range of ESG issues, having worked with leading asset owners and asset managers to design tailored solutions to integrate responsible investment into the creation of long-term value based on market understanding and expert analysis.

Institutional investors looking to vote in shareholder meetings globally can choose from ISS' U.S. and international benchmark policies, or specialty voting or specialty voting ISS guidelines that evaluate ESG topics from an assortment of investor viewpoints. ISS' range of specialty proxy voting guidelines evaluate issues from the perspective of socially-responsible investors, public funds, labor unions, mission and faith-based investors, as well as sustainability issues outlined by the PRI signatories seeking to incorporate ESG considerations into their proxy voting practices. ISS also manages full custom voting policies and implements voting recommendations for clients who wish to vote their proxies according to their own specific ESG oriented guidelines and philosophies.

**ISS' Benchmark Proxy Voting Policies**

ISS' Benchmark voting policies incorporate a rigorous analysis of governance and of other ESG topics that shareholders vote on. Environmental and social topics surface most frequently as shareholder resolutions, which are predominantly filed by investors predominantly at U.S., Japanese and Canadian firms. ISS' research and analysis on all ESG shareholder proposal topics include a contextual and insightful background of the subject, including environmental issues such as climate change, greenhouse gas emissions, renewable energy, hydraulic fracturing, coal combustion waste, and social topics such as workplace safety, anti-discrimination practices, and human and labour rights, to name a few. ISS' benchmark research reports will include relevant in-depth analysis, for example of how company practices compare to peers, assessments regarding common practices and disclosures, and extensive case-by-case evaluations of whether company disclosures, policies, and practices sufficiently address the ESG concerns highlighted by shareholder proponents in the resolutions submitted.

**ISS' SRI Proxy Voting Policy**

ISS has extensive experience and expertise on SRI related topics and over the past 16 years has developed SRI-themed proxy voting policies that cater to the unique viewpoints of many socially responsible investors. The SRI policy has been developed in collaboration with SRI market participants and ISS' SRI clients, and is also informed by the active ownership and investment philosophies of globally recognised initiatives such as the United Nations Environment Programme Finance Initiative, the PRI, the UN Global Compact, and environmental and social European Union Directives, among others.

The SRI policy incorporates a detailed analysis of ESG topics using ISS governance research and ISS-Ethix's Norm-Based Screening and controversies research, which is designed to proactively identify material ESG risks and controversies. This approach to voting recommendations includes employing the use of ESG risk indicators to identify moderate to severe ESG risk factors at over 20,000 companies and other business entities globally. The ESG risk indicators cover several topics, including: environmental stewardship, human rights and the impacts of business activities on local communities, labour rights and supply chain risks, consumer product safety, bribery and corruption, as well as governance and risk oversight failures. Under this ESG Risk Evaluation Framework, ISS may recommend votes against board members up for election for failure to sufficiently oversee, manage, or guard against material ESG risks.

#### ISS' Sustainability Proxy Voting Policy

ISS' Sustainability voting policy represents an approach to proxy voting that aligns with the perspectives of many mainstream investors, who wish to incorporate ESG considerations in their investment decision-making processes to a greater extent, including signatories to the PRI. The ISS Sustainability guidelines focus on economic value preservation and enhancement through promotion of corporate governance best practices that mitigate risks to shareowners, but also reflect the recognition that ESG factors could present material risks to portfolio investments. The Sustainability policy was specifically formulated to meet the growing need of many institutional investors to increasingly account for ESG elements in their voting practices, including signatories to the PRI looking to fulfil their obligations to the UNPRI from a proxy voting perspective. ISS liaised with the PRI Secretariat to help inform the development of the Sustainability voting guidelines.

SG 02	Mandatory	Public	Descriptive
<b>SG 02.1</b>	Indicate which of your policy documents or statements (if any) are publicly available. Provide the URL and an attachment of the document.		

#### Policy or document name

- Formalised guidelines on environmental factors

	URL
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<http://www.issgovernance.com/file/faq/es-key-issues-discloure-transparency-qualityscore.pdf>

- Formalised guidelines on social factors

	URL
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<http://www.issgovernance.com/file/faq/es-key-issues-discloure-transparency-qualityscore.pdf>

- Formalised guidelines on corporate governance factors

URL

<https://www.issgovernance.com/policy-gateway/2017-policy-information/>

Formalised guidelines on engagement approach

URL

<https://www.issgovernance.com/contact/faqs-engagement-on-proxy-research/>

Attachment (optional)

[File 1:iss-uk-stewardship-code-compliance-statement-160930\[1\].pdf](#)

Formalised guidelines on (proxy) voting approach

URL

<https://www.issgovernance.com/policy-gateway/2017-policy-information/>

We do not publicly disclose our policy documents

**SG 02.2** Additional information. [OPTIONAL]

Other technical documentation is also available on the ISS public website, including the methodology document for the ISS Pay-for-Performance and Equity Plan Scorecard models (accessible from the page disclosed under SG 02.1), the Governance QualityScore methodology document ("the Techdoc," available at [www.issgovernance.com/solutions/iss-analytics/qualityscore/](http://www.issgovernance.com/solutions/iss-analytics/qualityscore/)), and the Environmental and Social QualityScore Key Issue document available at [www.issgovernance.com/file/faq/es-key-issues-disclosure-transparency-qualityscore.pdf](http://www.issgovernance.com/file/faq/es-key-issues-disclosure-transparency-qualityscore.pdf).

<b>SG 03</b>	<b>Mandatory</b>	<b>Public</b>	<b>Descriptive</b>
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**SG 03.1**

Indicate what standards you have used to develop your organisation's policies. Tick all that apply.

- UN Principles for Responsible Investment
- UN Global Compact Principles
- UN Guiding Principles on Business and Human Rights
- Universal Declaration of Human Rights
- UN Sustainable Development Goals
- International Bill of Human Rights
- International Labour Organisation Conventions
- IFC Performance Standards
- United Nations Convention Against Corruption
- OECD Principles of Corporate Governance
- OECD Guidelines for Multinational Enterprises
- Other, specify (1)

Multiple including the Convention on Biodiversity, Rio Declaration on the Environment and Development, United Nations Framework Convention on Climate Change (Paris Agreement)

- Other, specify (2)

Multiple including the Geneva Conventions and The Hague Convention.

- Other, specify (3)

- Other, specify (4)

- Other, specify (5)

- None of the above

**SG 04****Mandatory****Public****Descriptive****SG 04.1**

Indicate whether you offer standard, off the shelf, policies to clients as part of your product offerings, and/or whether you create tailored versions for individual clients.

	Off the shelf	Tailored
Asset class-specific RI guidelines	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Sector-specific RI guidelines	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Screening/exclusions policy	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Engagement policy	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(Proxy) voting policy	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
RI guidelines set out within the Investment Policy Statement (IPS)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
RI guidelines set out in a freestanding RI policy	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Multi-year RI implementation project plan	<input type="checkbox"/>	<input type="checkbox"/>
Conflict of interest management policy	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Stockbroker allocation policy	<input type="checkbox"/>	<input type="checkbox"/>
Securities lending policy	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other, please specify (1)	<input type="checkbox"/>	<input type="checkbox"/>
Other, please specify (2)	<input type="checkbox"/>	<input type="checkbox"/>
Other, please specify (3)	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>

#### SG 04.2

Briefly describe how you incorporate ESG factors and RI-consideration when advising clients on policies.

#### Voting policies and guidelines

All ISS voting policies incorporate ESG factors to the extent appropriate for the particular policy and chosen investor approach, as described in section SG 04.1 above. ISS voting policies cover listed equities globally.

All ISS-Ethix screening services are applicable to both equities and corporate debt. Certain sector-specific RI guidelines are contained within the ISS Specialty proxy voting policies. An example would be the policy on investing in renewables as described in Section 8c0-3 of ISS' SRI US proxy voting guidelines. The Screening/exclusions policy and related thresholds can be set to reflect the investment focus and tolerance of the client for the controversial issues identified.

In addition, ISS assists many clients with the development and implementation of their own fully customized voting policies. Based on ISS' knowledge of global governance good practices and voting policy formulation, ISS works with clients with customized approaches to proxy voting to develop and implement policies based on each organizations' specific mandates, requirements and governance

perspectives. RI guidelines may be set out within a client's overall custom Investment Policy Statement (IPS) or within in a freestanding RI policy, depending on the needs of the individual client.

**ISS' Engagement Policy:**

ISS' and ISS-Ethix' products and services may be used as support tools to facilitate investor clients' own engagement efforts. ISS also undertakes engagement and dialogue with companies as part of the ISS proxy voting research process, but does not engage with companies on behalf of specific clients.

**Conflict of interest management policy**

ISS has adopted the Regulatory Code of Ethics ("the Code",) a copy of which is available upon request. All ISS employees are bound by and are required to adhere to the Code. The Code devotes special attention to identifying, disclosing, and seeking to prevent potential conflicts of interest. Particular attention is paid to ISS Corporate Solutions, Inc. ("ICS"), a separate and distinct subsidiary of ISS which provides governance analytics and advisory services to issuers.

There is an actively managed firewall in place as part of the processes that manage potential conflicts of interest for ISS proxy voting research. For example, issuers who are ICS clients may not disclose to any ISS analyst that they have acquired products or services from ICS, per their contract with ICS. ISS does not give preferential treatment to, and is under no obligation to support, any proposal of an issuer whether or not that issuer has purchased products or services from ICS. In order to avoid any appearance of conflict, ISS analysts have no access to information about ICS clients, and requires that in any communication issuers may have with ISS analysts, they do not disclose their identity as an ICS client or potential client, to help protect the integrity of the research process. A full, detailed description of ISS' policy for managing potential conflicts of interest is in section SG 15 of this report.

**Securities lending policy**

ISS does not own or provide asset management services with respect to any securities and therefore does not engage in any securities lending on its own account or on the account of any clients. ISS provides the Global Share Recall Notification Services to support situations where an institutional client has shares on loan as part of a securities lending program. Being aware of upcoming meetings and their record date allows an investor to make an informed decision whether they wish to recall their shares on loan or not. Anticipated record dates and status levels are provided in order to give clients probabilities of record date accuracy as well as governance factors related to the covered companies. ISS is aware that securities lending provides a revenue stream for clients, and the goal of ISS' service is to provide clients with sufficient information so they can make an informed decision on when to recall shares and preserve revenue on meetings with ordinary items.

SG 05	Mandatory	Public	Descriptive
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SG 05.1	Briefly describe how you include ESG/RI factors as part of your business offerings.
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**Business area**

Reporting
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How you include ESG/RI factors
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All of ISS' research and data products include reporting support, which may either be in the form of static profiles or dynamic querying. These may include a mix of environmental, social and governance products depending on the content set to which a client has subscribed. In addition, ISS supports investors who wish to disclose their voting policy and how they have applied it in practice by making their voting records public through the Vote Disclosure Service.

Active Ownership Services
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## How you include ESG/RI factors

ISS-Ethix Pooled Engagement is a tool for investors to exercise their active ownership through a focused dialogue with companies on ESG issues. Pooled Engagement is an extension to ISS-Ethix's Norm- Based Screening. Based on the results of Norm-Based Screening, investors can channel enquiries and requests for improved disclosure to companies involved in serious controversies around environmental and social issues.

## Research and Data Provision

### How you include ESG/RI factors

Institutions can choose from ISS' Benchmark policies, or specialty voting guidelines, such as SRI or Sustainability policies, that evaluate ESG topics on a meeting agenda from an assortment of investor viewpoints. ISS also manages full custom voting policies and implements voting recommendations for clients who wish to vote according to their own specific proxy voting guidelines and philosophies (whether on ESG oriented matters or otherwise).

For ISS-Ethix products, the ISS-Ethix Research team is internally divided into five core areas:

1. ISS-Ethix Climate Solutions assesses corporate climate change risk, including scope 1, 2 and upstream and downstream Scope 3 emissions based on sector estimates.
2. The Weapons and Sanctions Team processes company and expert sources to confirm corporate involvement in military equipment, specific weapons programmes, as well as civilian firearms.
3. The Global Norms Team covers Controversy Watch, Norm-Based Research, and Pooled Engagement activities.
4. The Sector Based Screening Team processes company sources to confirm corporate involvement in certain products and services.
5. The Sustainability Team assesses the quality of corporate disclosure on a full range of environmental, social and governance (ESG) issues. This data supports Environmental & Social QualityScore for Disclosure & Transparency Practices.

### SG 05.2

Indicate the roles in your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for ESG/RI.



Roles present in your organisation	Oversight/accountability for RI	Implementation of RI
Board	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Directors	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief Executive Officer (CEO), Chief Financial Officer (CFO)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other chief-level staff	<input type="checkbox"/>	<input type="checkbox"/>
Other heads of department	<input type="checkbox"/>	<div data-bbox="863 786 1362 846" style="background-color: #0070C0; color: white; padding: 2px;">Please specify</div> <p data-bbox="863 864 1362 2018">Other heads of department charged with implementing aspects of the firm's RI/ESG practices include (listed in alphabetical order): Oshni Arachchi, Head of Norms Research and Pooled Engagement; Warren Chen, Head of Asia ex-Japan Research; Damien Fruchart, Head of Sustainability Research; Robbert Gerritsen, Head of Continental European Research ,ex France and Germanic; Marc Goldstein, Head of US Research; Jamie Gracey, Head of Global Voting and Data Operations; Michael Gray, Head of RI Research Helpdesk; Cristiano Guerra, head of SSR Research; Max Horster, Head of ISS-Ethix Climate Solutions; Takeyuki Ishida, Head of Japanese Research; Michael Jenks, Head of Weapons and Sanctions Research; Lorraine Kelly, Head of ISS' Proxy Business; Vas Kolesnikoff, Head of Australia and New Zealand Research; Marija Kramer, Head of ISS' Responsible Investment Business; Vittorio Lara, Head of Specialty Research; Cedric Laverie, Head of French Research; Nathan Leclercq, Head of UK Research; Viola Lutz, Head of ISS-Ethix Climate Solutions Investor Consulting; Georgina Marshall, Global Head of ISS' Global Research; Patrick McGurn, Head of Strategic Research and Analysis; Fassil G. Michael, Head of Custom Specialized Research Services; Emelie Norling, Head of RI Product Management; John Roe, Head of ISS Analytics; Bert Rutherford, Head of RI Development</p>

		Catherine Salmon, Head of UK, France, MENA Research; Nelson Seraci, Head of Special Situations Research, Europe; Renata Schmitt Silva, Head of Latin America Research; Debra Sisti, Head of Canadian Research; Maria Anna Vologni, Head of European Custom Research; Thomas von Oehsen, Head of Germanic Central European Research; Reinhilde Weidacher, Head of ESG Research and Products
Dedicated ESG/RI staff	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other role, specify (1)	<input type="checkbox"/>	<input type="checkbox"/>
Other role, specify (2)	<input type="checkbox"/>	<input type="checkbox"/>
Other role, specify (3)	<input type="checkbox"/>	<input type="checkbox"/>
Other role, specify (4)	<input type="checkbox"/>	<input type="checkbox"/>
None of the above	<input type="checkbox"/>	<input type="checkbox"/>

**SG 05.3**

Indicate how you ensure ESG/RI expertise for the roles where there are RI oversight/accountability or implementation responsibilities.

- Staff training on ESG/RI incorporation
- Including ESG/RI knowledge factors in personal development goals
- Having development plans that aim to enhance ESG/RI knowledge of certain departments/teams/individuals
- Including ESG in selection requirements when hiring new employees
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- Other, specify (4)

**SG 05.4**

Indicate whether your organisation has any ESG/RI linked incentives for its employees.

- Yes
- No

**SG 07**

**Mandatory**

**Public**

**Descriptive**

**SG 07.1**

Indicate whether you provide training/educational services on ESG/RI. Tick all that apply.

- Board/trustee training
- Investment manager training
- Regulatory bodies/authorities or public policy makers
- Corporate executive training
- ESG analyst training
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- Other, specify (4)
- None of the above

**SG 07.2**

Describe the main components of your training/educational services on ESG/RI and any variations depending on the group you provide training/education to.

ISS delivers unparalleled client support, training and high-touch service by a dedicated team that includes a Client Consultant and an Account Executive. Upon request, ISS provides tailored training on corporate governance and responsible investment to investment manager clients. These may cover emerging themes or a deep-dive into particular areas in the client's policy. Upon request, ISS also provides tailored board/trustee training to Asset Owners who are developing or updating their responsible investment policy.

Additionally, ISS organizes and participates in ESG-related conferences and events, co-operates with universities and institutes and responds to publication and media requests

**SG 07.3**

Describe whether these training/educational services include any commercial elements.

ISS introduces and offers products during some training/educational services.

**SG 08****Mandatory****Public****Descriptive****SG 08.1**

Describe how your organisation applies, advances and promotes the PRI Principles.

Many of the institutional investors who are signatories to the PRI are also clients of ISS. ISS designs its products and services to help clients meet their broad requirements and mandates (whether internally or externally driven), and include their requirements as PRI signatories.

ISS helps investors integrate ESG issues into their investment analysis and decision-making processes (Principle 1) and to incorporate ESG issues into their ownership policies and practices (Principle 2.) ISS also supports investors with their reporting on responsible investment (Principle 6) via branded corporate governance and proxy voting disclosure website development and hosting. Through ISS Vote Disclosure Service (VDS), clients can meet their disclosure mandates with portfolio-level voting records that are accessible to clients and other stakeholders.

Both ISS and ISS-Ethix interact with companies as part of the standard research process. The objective of this interaction is to ensure that the ISS research is based on the most comprehensive and accurate information available, and is to seek appropriate levels of disclosure on ESG issues by the entities in which clients invest (Principle 3.). Additionally, ISS offers companies an online tool to verify the data collected for both Governance and Environmental & Social QualityScore offerings.

PRI signatories commit to promoting acceptance and implementation of the Principles within the investment industry (Principle 4.). In March and September 2017, ISS hosted two webinars with the PRI to discuss emerging trends investors should consider in fulfilling client mandates and meeting their responsibilities as a PRI signatory.

<b>SG 08.2</b>	Highlight whether there are any ways that your organisation would like to engage further with the PRI. [OPTIONAL]
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We would like to continue to support the work the PRI does to engage with signatories, raise the awareness of the benefits of ESG integration, active ownership, transparency and reporting, to grow the industry.

<b>SG 09</b>	<b>Mandatory</b>	<b>Public</b>	
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<b>SG 9.1</b>	Indicate which of the following actions your organisation has taken to promote responsible investments during the reporting year, independently of collaborative initiatives.
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- Provided or supported education or training programmes for clients, investment managers, legal advisers or other investment organisations
- Provided financial support for academic or industry research on responsible investment
- Encouraged better transparency and disclosure of responsible investment practices across the investment industry
- Spoken publicly at events and conferences to promote responsible investment
- Written and published in-house research papers on responsible investment
- Encouraged the adoption of the PRI
- Written and published articles on responsible investment in the media
- Policy engagements and other interactions
- Other, specify

<b>SG 9.2</b>	Additional information. [OPTIONAL]
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In 2017 ISS published a series of white papers publicly available at: <https://www.issgovernance.com/governance-exchange/white-papers/>

Further ISS-Ethix white papers are publicly available at: <https://www.issgovernance.com/esg/thought-leadership>

ISS maintains an active presence speaking at conferences and other events in the Americas, Europe and Asia-Pacific. These events or webinars may be ISS-hosted or produced by a third-party.

<b>SG 10</b>	<b>Mandatory</b>	<b>Public</b>	<b>Descriptive</b>
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<b>SG 10.1</b>	Indicate which of the following long-term trends are addressed in your product outputs.
----------------	-----------------------------------------------------------------------------------------

- Changing demographics
- Climate change

**SG 10.2**

Explain how this long-term trend affects your product outputs.

As investors seek to gain a better understanding of their exposure to climate-related risks, ISS-Ethix Climate Solutions provides data, analytics and advisory services to support financial market participants and governments to understand, measure, and act on climate-related risks and its impact on investments across all asset classes, see here: <https://www.issgovernance.com/esg/climate-solutions/>

By way of background, in June 2017, ISS-Ethix expanded its climate solutions offering by completing the acquisition of the investment climate data division of South Pole Group, which established the world's largest database of company-level climate change data and pioneered the development of leading, standardized investment carbon screening tools.

Resource scarcity

**SG 10.2**

Explain how this long-term trend affects your product outputs.

Environmental & Social QualityScore includes Natural Resources under its Environmental pillar. Questions related to a company's practices related to water scarcity, biodiversity management critical habitats, forest conservation, and minimizing impacts on High Conservation Value (HCV) areas.

Technology developments

Other, specify (1)

Social equity

**SG 10.2**

Explain how this long-term trend affects your product outputs.

Environmental & Social QualityScore includes Human Rights under its Social pillar. Questions related to a company's practices on indigenous rights, right to water, human trafficking and slavery, economic inclusion, conflict minerals, and fair or living wages.

Other, specify (2)

None of the above

**SG 12****Mandatory****Public****Descriptive****SG 12.1**

Describe how you align your organisation's philosophy on and approach to ESG/RI with investor goals.

Describe

Recognizing that no two clients are alike, ISS offers a range of services to meet client needs across the full spectrum of responsible investment and ESG solutions. ISS does not seek to impose a one-size-fits-all approach as previously discussed.

This is not relevant for my organisation

**SG 13****Mandatory****Public****Descriptive**

SG 13.1

Describe what steps you take, if any, when your ESG recommendations are not in line with investor goals.

- Describe
- This is not relevant for my organisation

SG 14

Mandatory

Public

Descriptive

SG 14.1

Indicate whether you seek feedback from clients on your RI/ESG services and product offerings

- Yes

SG 14.2

Describe how you use this feedback in your RI/ESG services and product offerings.

ISS seeks feedback from a diverse range of market participants through multiple channels. The processes for incorporating feedback for benchmark policy development and research approach, and ISS-Ethix ESG research approach are outlined below.

#### **Benchmark Policy Development and Research Approach**

ISS' market and regional benchmark voting policies are formulated through a robust process that takes advantage of ISS' own expertise and that of the broader governance community. ISS engages with institutional clients, the academic community, companies, and other industry experts worldwide to gather input on ISS' proxy voting policies and methodologies. The result is a set of proxy voting guidelines that often serve as an industry standard and best practice guide to corporate governance. ISS strives to ensure its policies are clear, balanced and well-reasoned.

Led by the ISS Global Policy Board, the bottoms-up approach to policy formulation and development ensures that ISS incorporates its own expertise combined with feedback from a diverse range of market participants through multiple channels:

- Ongoing dialogue with and feedback from investor clients, and other participants in the capital markets, including companies, regulatory agencies and the academic community
- Roundtable and other similar sessions with clients and relevant industry groups
- An annual policy survey open to all interested parties, and designed to obtain a variety of input from institutional investors and companies, and from other stakeholder groups, to test policy development ideas and elicit feedback.

The ISS Global Policy Board uses all this input to consider draft policy updates on emerging governance issues each year. Before finalizing policy changes, ISS publishes draft updates for an open review and comment period. All comments received during the open comment period are considered and are also posted to the ISS website in order to provide the highest level of transparency into the market's feedback. Final policy guidelines for most markets are published in Q4 each year to apply to meetings held after February 1st of the following year. All of ISS' benchmark and specialty proxy voting policies are reviewed annually, taking into account evolving perspectives, best practices, and related legal and market-specific developments.

In addition, ISS provides an open mechanism for comment and input through its Feedback Review Board, which is accessible on the ISS website ([www.issgovernance.com](http://www.issgovernance.com)), and serves as an additional channel for any market participant to communicate with ISS regarding accuracy of research, accuracy of data, policy application and general fairness of ISS' policies, research, and vote recommendations.

Product feedback is gathered from ISS colleagues, clients and products through emails, telephone calls, individual meetings and at ISS-hosted events such as the autumn roundtables.

#### **ISS-Ethix ESG Research Approach**

ISS-Ethix also engages in a fact-finding dialogue with official and expert sources for additional clarification or documentation.

ISS has a global team of experts across the full range of governance, environmental, social, and sustainability issues of relevance to the financial market. The team participates in many best practice industry networks to keep abreast of and actively engage in market developments. Senior team

members lead ISS-Ethix's engagement with regulatory bodies globally, proponents of ESG shareholder proposals in key markets, and key stakeholders in local markets, such as NGOs, expert organizations and academia. This systematically feeds back to both the ongoing and annual review of research methodologies and overall product offering.

Methodology reviews are conducted annually, now by the Responsible Investment Methodology Review Board created in 2017, with input from cross-functional teams across the Responsible Investment Business and clients. The mission of the Board is to provide the clearest possible research methodology to all stakeholders and consumers of ISS- Ethix products while ensuring leadership and alignment with global norms and market trends in the sustainable and responsible investing industry.

Additional reviews occur following significant events, including the following:

- Normative developments (international law in particular) of relevance to ESG standards
- Statements by authoritative sources, such as UN bodies, the International Labour Organization, and multi-stakeholder initiatives
- Updates in local market regulations

Once reviewed by the Methodology Review Board, changes are communicated to clients, together with a timeline for their implementation. The update will usually occur in the first quarter of the year.

No

SG 15	Mandatory	Public	Descriptive
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SG 15.1	Indicate whether your organisation has a policy for managing potential conflicts of interest.
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Yes

SG 15.2	Describe how you manage potential conflicts of interest.
---------	----------------------------------------------------------

ISS has adopted a Policy Regarding Disclosure of Significant Relationships ("Disclosure Policy"). The purpose of this Disclosure Policy is to explain (a) ISS' framework for assessing whether a relationship with an issuer that is the subject of a proxy research report, or with a security holder proponent of a matter on ISS which is providing proxy research advice, is "significant"; and (b) the manner in which ISS will disclose any such significant relationships to the recipients of ISS' proxy research reports. As described in the Disclosure Policy, ISS is a service provider to both institutional investors and corporate issuers. The firm separates these activities into distinct business lines: ISS, which serves institutional investors and ISS Corporate Solutions, Inc. ("ICS"), a wholly owned subsidiary of ISS that is managed separately from ISS' institutional business, and distributes data, and analytical tools and other products, to corporate issuers.

The Disclosure Policy also addresses ISS' approach to disclosure of potential conflicts presented by relationships with clients that are themselves publicly traded issuers (for example, a publicly-traded institutional investor), and with clients that are proponents of a shareholder proposal. Clients are able to review these "significant relationships" within ProxyExchange.

In addition, all ISS employees are bound by and are required to adhere to ISS' Regulatory Code of Ethics ("the Code"). On an annual basis, all employees are required to review and acknowledge their understanding of and adherence to the Code, which describes certain standards of conduct that the company's employees must follow. The Code, among other things, affirms ISS' relationship of trust with its clients and obligates ISS to carry out its duties solely in the best interest of clients and free from all compromising influences and loyalties. The Code devotes special attention to identifying, disclosing, and seeking to prevent potential conflicts of interest, including the potential conflicts between ISS' institutional proxy advisory services and the corporate services of ICS. The goal of the Code is to prevent conflicts wherever possible, and to manage and disclose those conflicts as necessary.

In addition, to address potential conflicts with its parent company, ISS has adopted a Policy on Potential Conflicts of Interest Related to Genstar Capital and its affiliated funds (the "Genstar

Policy"). Among other things, the Genstar Policy provides that Genstar persons (defined as Genstar directors and certain others) may not participate in the formulation, development and application of ISS voting policies, and will not have access to any data relating to the portfolio, investment strategy or securities holdings of ISS clients.

**SG 15.3**

Describe how you ensure that company employees do not derive any personal gain from the use of information collected during your work process.

ISS is a Registered Investment Adviser ("RIA") and as such is subject to the Advisers Act and the rules and regulations that the U.S. Securities and Exchange Commission ("SEC") has promulgated thereunder. ISS has a Regulatory Code of Ethics as part of its compliance program. The purpose of the Regulatory Code of Ethics is twofold: (1) to satisfy the requirements of Rule 204A-1 of the Investment Advisers Act of 1940 ("Advisers Act") (2) to provide all employees, with detailed policies and procedures on business conduct. ISS adopted the Regulatory Code to ensure that employees are aware of requirements and policies with respect to treatment of confidential information, avoidance of conflicts and potential conflicts of interest, reporting of personal trading activity, limits on political contributions, requirements for creating and maintaining records, and other compliance obligations. More generally, the Code sets forth ISS' minimum requirements expectations regarding the conduct of all employees.

No



# Institutional Shareholder Services (ISS)

## Reported Information

### Public version

### Reporting

## PRI disclaimer

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## Type of reporting and assurance

REP 01

Mandatory

Public

Gateway

**REP 01.1** Indicate the type of reporting that you prepare on behalf of clients. Tick all that apply.

- Integrated reporting
- RI reporting
- Sustainability reporting
- Financial reporting
- Other, specify (1)

ISS produces reports on the corporate governance and responsible investment practices of the companies it covers.

- Other, specify (2)

ISS supports investors who wish to disclose their voting policy and how they have applied it in practice (voting records) through the Vote Disclosure Service.

- None of the above

**REP 01.2** Indicate whether your services include any variety of third party assurance or certification/labelling scheme of clients' ESG/RI data, processes or products.

- Yes

**REP 01.3** Indicate the type of assurance or certification/labelling scheme services that you provide.

- Third party assurance of data points
- Third party assurance of the implementation of RI/ESG processes
- Third party assurance of a public RI/ESG report
- External ESG audit of holdings
- RI Certification or labelling scheme, specify
- Other, specify (1)
- Other, specify (2)

- No

**REP 01.4** Additional information. [OPTIONAL]

Climetrics is the world's first climate impact rating for funds, enabling investors to more efficiently integrate climate impact into investment decision making. The rating - symbolized by green leaves "issued" on a scale of one to five (where 5 leaves indicates outstanding climate performance) - enables investors to gauge and compare the climate impact of investments in funds and potentially encourage growth in climate-responsible fund products.

Climetrics [www.climetrics-rating.org](http://www.climetrics-rating.org) was developed by CDP Europe and ISS-Ethix Climate Solutions, in consultation with NGOs, investors and universities. Climetrics is run by CDP in partnership with ISS Climetrics Solutions and YourSRI.com, the leading database and research engine for ESG investing. The project was funded and catalysed by Climate-Kic, the European Union's main climate innovation initiative.

## Reporting frameworks/standards/guidelines

REP 02

Mandatory

Public

REP 02.1

Indicate what reporting frameworks /standards/guidelines you use when preparing reports for clients. Tick all that apply.

- OECD, Guidelines for Multinational Enterprises
  - OECD Guidelines for Multinational Enterprises, IV. Human Rights
  - OECD Guidelines for Multinational Enterprises, V. Employment and Industrial Relations
  - OECD Guidelines for Multinational Enterprises, VI. Environment
  - OECD Guidelines for Multinational Enterprises, VII. Combating Bribery, Bribe Solicitation and Extortion
  - OECD Guidelines for Multinational Enterprises, VIII. Consumer Interests
  - OECD Guidelines for Multinational Enterprises, X. Competition
  - OECD Guidelines for Multinational Enterprises, XI. Taxation
- OECD Principles of Corporate Governance
- ILO
- ISO, specify
  - 14001: 1996 Environment Management Systems
  - 14064: GHG Emissions Management Systems
  - 37001: 2016 Anti-bribery Management Systems
  - 50001: Energy Efficiency Management Systems
- UN Global Compact
- GRI
- SASB
- IIRC
- PRI
- CDP
- Stewardship code
- Other, specify (1)
  - Taskforce for Climate-related Financial Disclosure (TCFD)
- Other, specify (2)
  - UN Guiding Principles on Business and Human Rights
- Other, specify (3)
  - ILO Tripartite Declaration of Principles concerning Multinational Enterprises & Social Policy

REP 02.2

Additional information. [OPTIONAL]

Our products and services help clients who are signatories to the PRI and the various global Stewardship Codes meet their reporting obligations. We incorporate CDP indicators in a number of Custom policies, for investors who wish to assess the reporting practices of companies. Pooled Engagement Services offers a way for investors across markets to jointly engage with companies regarding the disclosure of ESG risks and performance, and report on those engagements.

## Incorporating ESG

REP 03

Mandatory

Public

REP 03.1

Indicate whether you incorporate ESG factors into your reporting products for clients.

- Yes, we systematically do

REP 03.2

If yes, describe how you incorporate E, S, and G factors into the reporting.

ISS produces reports on the corporate governance and responsible investment practices of the companies it covers. Topics include:

- Proxy research and voting services;
- Governance data and analytics, such as board and committee composition, executive compensation, and director pay; and
- Responsible investment screens services, including norm-based research and ethical screening.

- Yes, we occasionally do
- No, we do not

## ESG in materiality analysis

REP 04

Mandatory

Public

Descriptive

REP 04.1

Indicate whether ESG is part of the materiality analysis you perform when preparing clients' reports.

- Yes, ESG is systematically part of the materiality analysis

REP 04.3

Describe the process you undertake for materiality analysis. [OPTIONAL]

We have standard reporting templates for the outputs from our reporting and data products. The indicators which are included in these are reviewed at least annually, as part of the product and policy development process outlined previously.

- Yes, ESG is occasionally part of the materiality analysis
- No, ESG is not part of the materiality analysis

## Assurance standards and assuring ESG

REP 05

Mandatory

Public

Descriptive

**REP 05.1**

List the standards and certifications that have an ESG/RI component, that you use to assure client organisations' reporting data/processes or products against.

- ISAE 3000
- ISAE 2403
- AAFOI/06
- Regional code, specify
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- Other, specify (4)
- None of the above

**REP 05.4**

Additional information. [OPTIONAL]

Quality assurance routines across all ISS products build on extensive peer review throughout the research process and strict enhanced sign-off routines, involving the relevant Team lead and the Head of Research where appropriate.

ISS Proxy Research engages with companies to clarify anything which is not clear in the publicly available information on which the analyst bases the vote recommendations. In certain markets and subject to ISS' guidelines, a segment of companies are provided with an opportunity to review a draft of their proxy research report for purposes of verifying the factual accuracy of the report. Companies are always entitled to receive a free copy of the final proxy research report which has been published by ISS about that company and issued to subscribing clients. If a material factual error is brought to the attention of the research analyst post-publication, they will correct the error, reissue the report and issue a formal Alert which is provided to all subscribing clients who received the original report.

ISS-Ethix's Global Norms and Controversial weapons research teams establish the accuracy of any allegations against a company through active company and stakeholder dialogues. ISS-Ethix conducts fact-finding dialogue with companies as soon as research into an allegation is initiated. As part of this dialogue, the company is informed about the allegation and offered an opportunity to present its position. This dialogue is ongoing for as long as ISS-Ethix maintains its assessment that a company is involved in verified or alleged (and unaddressed) violations of global norms, or involved in controversial weapons. As part of this fact-finding dialogue, the company is also informed about the overall conclusion and provided with the analysis. This latter point is particularly important as ISS-Ethix recognises that companies (a) often have information that is not available through other sources, and (b) as a matter of principle, it is essential that companies have the opportunity to review and, as appropriate, challenge the assessments. The quality control function within the ESG research team supports timely, comprehensive and transparent action when errors are detected.

Companies who are within the coverage universe of certain of ISS' data products, including ISS Governance and Environment & Social QualityScore products, are invited to review, verify and provide feedback on the data used to determine their scores via a complementary a year-round data verification tool, accessed through ISS Corporate Solutions' Governance Analytics platform. Submissions of corrected or updated data factors can be made online through the platform.

# Institutional Shareholder Services (ISS)

## Reported Information

### Public version

### Active Ownership Services

## PRI disclaimer

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## Active ownership services

AOS 01	Mandatory	Public	Gateway
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**AOS 01.1** Indicate which active ownership services are part of your business offerings. Tick all that apply.

- Engagement
- Voting

**AOS 01.2** Indicate which markets your organisation covers.

- Developed markets
- Emerging markets

**AOS 01.3** Additional information [OPTIONAL]

### Sectors

- Oil & gas sector
- Food, beverage & tobacco Industry
- Manufacturing industry
- Metals & mining sector
- Textiles industry
- Automobiles & components
- Transportation

AOS 02	Mandatory	Public	Descriptive
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**AOS 02.1** Indicate where you acquire your ESG data and information.

- Regulatory sources
- Information from stakeholders and NGOs
- In-person meetings or calls with company, industry, municipality or government representatives
- Media reporting (including social media, blogs and similar)
- Primary data (self-reported from companies or other organisations)
- Secondary data (from ESG research provider databases)
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)

**AOS 02.2** Describe how this information is used in your product/service offerings.

Defining the data to collect and procuring the bulk of it in-house allows ISS to anticipate the needs of our clients and develop tailored, innovative solutions.

## Engagement

AOS 04.1	Describe how you select priority engagement topics to raise with companies.
----------	-----------------------------------------------------------------------------

By way of background, ISS and ISS-Ethix services are designed in part as support tools to facilitate clients' own engagement. ISS does not conduct bespoke engagement activities on behalf of specific individual clients.

ISS-Ethix provides Pooled Engagement for clients to exercise active ownership through dialogue with companies on environmental, social and governance (ESG) issues. Pooled Engagement also supports signatories in fulfilling their commitment to active ownership; to incorporate ESG principles into ownership policies and practices; to seek disclosure on ESG issues from companies they invest in; and to report on activities and progress.

Both ISS and ISS-Ethix interact with companies as part of the standard research process. The objective of this interaction is to ensure that our research is based on the most comprehensive and accurate information available, and is for the benefit of all ISS clients. This type of interaction is considered by the PRI as part of the research activities to support Principle 1 - incorporate ESG issues into investment analysis and decision-making processes.

The rest of this response will focus on the ISS-Ethix Pooled Engagement product.

Pooled Engagement is a tool for investors to exercise their active ownership through a focused dialogue with companies on environmental, social and governance (ESG) issues. Pooled Engagement is an extension to Norm-Based Screening, the research methodology that analyses companies' involvement in failures to respect global norms on environmental protection, human rights, labour standards and anti-corruption and attaches a Red assessment signal (Companies verifiably involved in an unaddressed failure) or Amber assessment signal (Companies allegedly involved in an unaddressed failure).

Annually, Pooled Engagement facilitates dialogue with around 100 listed companies exposed to alleged or verified violations of norms for environmental protection, human rights, labour standards and anti-corruption (i.e. with a red or amber signal.)

ISS-Ethix's Pooled Engagement service focuses on companies that are assessed under Norm-Based Screening to face alleged or verified severe, systematic or systemic violations of international norms. Engagement under the service is preceded by the feasibility study undertaken under Norm-Based Screening through which we determine whether the desired change to norm-violating practices can be achieved through dialogue. Influential factors include the company's perceived level of responsibility, steps it has taken to mitigate the possibility of a norm-violation and availability of both stakeholder and expert sources to facilitate constructive dialogue. Engagement is also accompanied by clear and time-bound engagement targets.

AOS 04.2	Describe how you define the objectives and milestones of the engagements and how you involve your clients in this process.
----------	----------------------------------------------------------------------------------------------------------------------------

In line with the targets established under the feasibility study, ISS-Ethix addresses shortcomings in the context of the business case, including the standards for the company's industry. ISS starts by building a dialogue with the subject company, a relationship that creates conditions for a constructive discussion through which investors may in turn gather information to information their own engagement efforts (at their discretion). Next ISS identifies how the company addresses operational, legal and reputational risk, and how its risk management processes compare to its peers. The objective with ISS-Ethix's Pooled Engagement approach is improved disclosure - to encourage companies to elaborate on their efforts to design and implement better risk management systems, effective at the operational level.

In terms of reaching agreement, institutional clients who have opted in to the pooled engagement service receive an e-mail containing approximately 25 draft letters in the beginning of each quarter (the exact number varies by quarter but is always at least 25). Upon reviewing the draft engagement letters, clients then have the possibility to opt-out of any company dialogue process. Letters are then signed by the investors who remain in the opt-in pool and sent to companies.



**AOS 05.1**

Indicate what channels you use to engage. Tick all that apply and indicate the frequency with which you typically use the channels.

**Engagement type**

- Letters and e-mails

	Frequency
--	-----------

- In some cases
- In majority of cases
- In all cases

- Meetings (in-person / conference calls / remote)

	Frequency
--	-----------

- In some cases
- In majority of cases
- In all cases

- Visits to operation
- Other (1), specify
- Other (2), specify
- Other (3), specify

**AOS 05.2**

Describe your typical execution method.

An initial letter will be sent to the company. Over the next few months, if there is no response, the analyst will make multiple attempts to get in touch via phone calls and e-mails. By 6 months, if no satisfactory response has been received, a letter to the CEO will be sent with the initial contact on email copy. There will then be follow up to another 6 months of attempts at engagement. Over time gradual progress is often noted with most companies with which engagement is sought. Other companies require repeated follow up to respond, and some companies steadfastly fail to respond to these pooled engagement efforts. To address these challenges in communication, regular and courteous follow-up is built into our approach. Once ISS has made every effort to engage both investor relations and the company CEO, the feasibility of engagement is re-evaluated at 12 months. In certain cases, where a company has proven unresponsive to investor efforts to seek dialogue and information, the decision is taken by ISS-Ethix to discontinue dialogue on verified reports of norm violations.

**AOS 06****Mandatory****Public****Descriptive****AOS 06.1**

Indicate from the options below the employee at the companies you typically engage with.

**Employee level**

- Board members

**Frequency**

- In some cases
- In majority of cases
- In all cases
- Corporate secretary/general counsel
- CEOs
- Other C-level staff or heads of departments
- Investor relations-teams

**Frequency**

- In some cases
- In majority of cases
- In all cases
- Sustainability/CSR members

**Frequency**

- In some cases
- In majority of cases
- In all cases
- Non-management employees
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)

**AOS 06.2** Describe how you ensure the client’s rationale and engagement objectives are being communicated clearly to the company at the beginning and during the dialogue phase.

Institutional clients who have opted in to the service receive an e-mail with approximately 25 draft letters in the beginning of each quarter, which they review and sign. The investor always has the option to opt-out of an engagement and to query the text with the Pooled Engagement team if anything is unclear.

**AOS 06.3** Describe the escalation strategies you take (or suggest that your clients take) if the engaged companies are not responsive or become disengaged.

Some companies steadfastly fail to respond to investor concerns. To address these challenges in communication, regular and courteous follow-up is built into our approach.

<b>AOS 07</b>	<b>Mandatory</b>	<b>Public</b>	<b>Descriptive</b>
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**AOS 07.1** Indicate how you monitor the progress of engagements.

- Track and/or monitor progress against defined milestones and objectives.
- Execute a process for when objectives are not met
- Review and, if necessary, revise objectives on an ongoing basis
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- None of the above

**AOS 07.2** Describe how you typically decide what recommendations for next steps to give to clients.

- Yes, we do provide clients with recommendations for next steps
- We do not provide clients with recommendations for next steps

<b>AOS 08</b>	<b>Mandatory</b>	<b>Public</b>	<b>Descriptive</b>
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**AOS 08.1** Describe how you define success when evaluating/reviewing engagements on ESG factors.

The objective with ISS-Ethix's Pooled Engagement approach is to encourage companies to elaborate on their efforts to design and implement better risk management systems – effective at the operational level.

**AOS 08.2** Describe how you measure success when evaluating/reviewing these engagements.

Of the 105 companies that ISS-Ethix was conferred the mandate to represent investors over the course of 2017, 67 (64%) disclosed their efforts to mitigate risks associated within their operations or their involvement in controversial projects. The following represents activities where companies have, taking note of investor interest, proactively reported on their efforts to manage identified ESG risks or where engagement has been closed as information provided to ISS-Ethix through the Norm-Based Screening process has resulted in a revision to the assessment on the company and indicated that further engagement with the company is unnecessary.

**AOS 08.3** Additional information [OPTIONAL]

Over time gradual progress is noted with most companies with which engagement is sought. Others require repeat follow up to respond, and some companies steadfastly fail to respond to investor concerns. To address these challenges in communication, regular and courteous follow-up is built into our approach. Once ISS has made every effort to engage both investor relations and the company CEO, the feasibility of engagement is re-evaluated. In certain cases, where a company has proven unresponsive to investor efforts to exercise active ownership, the decision is taken by ISS-Ethix to discontinue dialogue on verified reports of norm violations.

**Voting**

<b>AOS 11</b>	<b>Mandatory</b>	<b>Public</b>	<b>Descriptive</b>
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**AOS 11.1** Describe how ESG factors are taken into consideration in voting recommendations

Institutions can choose from ISS' benchmark policies, or specialty voting guidelines that evaluate ESG topics from an assortment of investor viewpoints. ISS' range of specialty proxy voting guidelines evaluate

issues from the perspective of socially-responsible investors, public funds, labour unions, mission and faith-based investors, as well as sustainability issues outlined by the Principles for Responsible Investment ("PRI") signatories seeking to incorporate ESG considerations into their proxy voting practices. ISS also manages full custom voting policies and implements voting recommendations for clients who wish to vote their proxies according to their own specific ESG oriented guidelines and philosophies. The Benchmark and Specialty policies can be accessed from <https://www.issgovernance.com/policy-gateway/voting-policies/>

AOS 13	Mandatory	Public	Descriptive
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AOS 13.1	Indicate whether you communicate the rationale to companies when you, on behalf of your clients, abstain or vote against management proposals.
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- Yes, in most cases
- Sometimes, in the following cases:
- We do not communicate the rationale to companies
- Not applicable because we do not abstain or vote against management recommendations

AOS 13.2	Additional information [OPTIONAL]
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After the vote recommendations are published to the ProxyExchange (PX) voting platform, clients can either vote in line with ISS or choose to override the recommendations. Others may choose to set up their workflow with a 'REFER' option which alerts the client that there is a controversial vote pending, but does not commit the client to voting in any particular way. Under either process, each client is responsible for its own voting decisions and is always free to follow or reject any ISS vote recommendation.

AOS 14	Mandatory	Public	Descriptive
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AOS 14.1	Describe how you monitor voting outcomes.
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ISS captures the meeting results for the company, and includes these in next year's proxy research report. ISS Research also capture any correspondence with the company and log this in the Engagement Module.

AOS 14.2	Describe how you typically decide what recommendations for next steps to give to clients.
----------	-------------------------------------------------------------------------------------------

- Yes, we do provide recommendations for next steps
- We do not provide recommendations for next steps

AOS 14.3	Additional information [OPTIONAL]
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ISS provides the rationale for the vote recommendation in our analysis, and where the company has explained why an alternate course of action is appropriate, their justification will be summarized in the research report.

AOS 15	Mandatory	Public	
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**AOS 15.1**

Indicate whether you have formal mechanisms in place for clients to review your voting recommendations.

Yes

**AOS 15.2**

Describe the formal mechanisms you have in place if clients wish to review your voting recommendation and/or give voting instructions different from your recommendations.

In terms of the research process, if clients disagree with the ISS vote recommendations, they can and do contact the relevant analyst with their feedback. If there is additional public information which comes to light and is material to the analysis, the analyst will amend the report, whether the vote recommendation is impacted or not, and then issue an Alert to bring it to the attention of our institutional clients on the ISS voting platform, ProxyExchange.

Proxy Alerts are distributed to institutional clients the same way regular proxy analyses are distributed and the same clients who received the original analysis will receive any corresponding Proxy Alert.

In terms of the operational voting instructions process, after the vote recommendations are published to the ProxyExchange (PX) voting platform, clients can either vote in line with ISS or choose to override the recommendations. Others may choose to set up their workflow with a 'REFER' option which alerts the client that there is a controversial vote pending, but does not commit the client to voting in any particular way. Under either process, each client is responsible for its own voting decisions and is always free to follow or reject any ISS vote recommendation.

No

**AOS 16**

**Mandatory**

**Public**

**Descriptive**

**AOS 16.1**

Describe your involvement in any project to improve the voting trail and/or to obtain vote confirmation for your clients.

Yes, we involve project to improve the voting trail and/or to obtain vote confirmation for our clients.

ISS actively participates in industry working groups and other forums both at national and international level and collaborates with other participants, such as SWIFT, in trying to find solutions to this and other issues facing the industry. In the past ISS has collaborated with SWIFT and other participants in the design of the ISO20022 xml messages, which can facilitate post meeting vote confirmations. ISS continues to lobby for the usage of this global standard at national and international as a standardized approach across markets, which is the key to encouraging widespread adoption across the industry. ISS was also a key contributor to the recent UNPRI vote confirmation case study covering Issuers from the UK and the Netherlands.

Not applicable

## Communication and sharing ESG information

**AOS 17**

**Mandatory**

**Public**

**Descriptive**

**AOS 17.1**

Indicate whether you proactively disclose your engagement and/or voting outcomes to clients and the public.

Engagement

### Clients

- Disclosed quarterly or more frequently
- Disclosed biannually
- Disclosed annually
- Disclosed less frequently than annually
- Disclosed ad hoc/when requested

### Public

- Disclosed quarterly or more frequently
- Disclosed biannually
- Disclosed annually
- Disclosed less frequently than annually
- Disclosed ad hoc/when requested

### Voting

#### Clients

- Continuously (soon after votes are cast)
- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc/as requested

#### Public

- Continuously (soon after votes are cast)
- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc/as requested

**AOS 17.2**

Indicate how you ensure all ESG information on companies gained as a result of engagement and/or voting activities is shared with clients.

 Engagement

- We proactively ensure that all ESG information is made available.
- We share all ESG information upon request.
- We do not make any additional ESG information.

 Voting

- We proactively ensure that all ESG information is made available.
- We share all ESG information upon request.
- We do not make any additional ESG information.

**AOS 17.3**

Additional information [OPTIONAL]

Relevant information learned by ISS is delivered to subscribing clients through our product offering.

# Institutional Shareholder Services (ISS)

## Reported Information

## Public version

## Research and Data Provision

## PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.



## Product level

RDP 01

Mandatory

Public

**RDP 01.1** Indicate your product type. Tick all that apply.

- Analysis
- Benchmarking reports
- ESG ratings
- Credit ratings
- ESG indices
- Raw data
- Second party opinion on green or social bonds
- Surveys
- Other, specify

Fund screening and ratings

**RDP 01.2** Indicate whether you make any of your products publicly available.

- Yes, all products
- Yes, some products
- No, we do not

**RDP 01.3** Additional information. [OPTIONAL]

Company and pillar-level scores for companies covered under ISS Governance and Environmental & Social QualityScore are available free of charge for a restricted universe via the ISS website and Yahoo Finance (US companies only) Beyond that, the bulk of ISS' products and services are available on a licensed basis only to subscribing clients.

## Research/process level

RDP 02

Mandatory

Public

**RDP 02.1**

Indicate the types of sources you use for research and/or ratings of companies/sectors/geographies or similar. Tick all that apply.

- Your organisation's independently collected data from public sources
- Regulatory sources
- Information from NGOs and other stakeholders
- In-person meetings or calls with company or industry representatives
- Primary data (self-reported from companies or other organisations)
- Secondary data (from other research provider databases)
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)

**RDP 02.2**

Indicate how ESG factors are incorporated into your research and/or rating methodology

- Identifying exposure and risk to ESG factors
- Considering responses to self-assessment questions on ESG
- Assessing current and future capacity to manage or mitigate ESG risks
- Assessing past and potential future performance on ESG factors
- Assessing alignment and compliance to different policies and regulations
- Assessing current and future positive ESG impacts
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)

**RDP 02.3**

Describe how you define materiality and how this is captured in your research and/or rating methodology as well as final product.

ISS' understanding of materiality is sustainability-driven. In our opinion, most aspects of sustainability have a short or long-term impact on the financial development of a company. The reality is the market sees benefits in ratings that are more disclosure focused, and ratings that are more "materiality" based. E & S QualityScore's focus on depth of disclosure on metrics most material to the company's specific industries and peers resonates with investors.

**RDP 02.4**

Additional information. [OPTIONAL]

ISS' ESG data is largely sourced from publicly available data, such as regulated filings, reports, press releases, company web sites, media and NGO reports, and government disclosure.

**Proxy Research:** ISS' proxy research reports are based entirely on publicly available data. The key source is usually the most recent publicly-available meeting materials, the contents of which may sometimes be clarified during conversations with the covered company.

**Weapons and Sanctions Screening and Sector Based Screening:** Data is based on publicly available information, in addition to feedback received from the issuer during the fact-finding dialogue.

**Norm-Based Research:** ISS Ethix's norm-based research takes a broader range of sources including input from regulators, stakeholders and NGOs.

**Climate Solutions:** Climate Solutions data includes both disclosed and modeled emissions data. Publicly reported emissions data is assigned with a 'trust metric' to indicate the quality of self-reported data. For all non-reporting companies, or those who report with a low trust metric, ISS-Ethix Climate Solutions utilizes an in-house modeling system which includes over 800 sector and subsector specific models to calculate emissions based on the criteria most relevant to each issuer's line of business.

**Governance and Environment & Social QualityScore:** QualityScore indicators focus on corporate disclosure and transparency, therefore all data must be disclosed by a company or by a competent regulatory body, enforcement group, or industry reporting initiative. Data also includes feedback received from the issuer during the data verification process.

In addition, financial data from third party vendors is incorporated in several research report and product profile offerings

RDP 03	Mandatory	Public	Descriptive
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RDP 03.1	Describe how you actively include inputs and information, wherever possible, from relevant stakeholders or interested parties, in the research process or in reaching assessment conclusions.
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Quality assurance routines across all ISS products build on extensive peer review throughout the research process and strict enhanced sign-off routines, involving the relevant Team lead and the Head of Research where appropriate.

ISS Proxy Research engages with companies to clarify anything which is not clear in the publicly available information on which the analyst bases the vote recommendations. In certain markets and subject to ISS' guidelines, a segment of companies are provided with an opportunity to review a draft of their proxy research report for purposes of verifying the factual accuracy of the report. Companies are always entitled to receive a free copy of the final proxy research report which has been published by ISS about that company and issued to subscribing clients. If a material factual error is brought to the attention of the research analyst post-publication, they will correct the error, reissue the report and issue a formal Alert which is provided to all subscribing clients who received the original report.

ISS-Ethix's Global Norms and Controversial weapons research teams establish the accuracy of any allegations against a company through active company and stakeholder dialogues. ISS-Ethix conducts fact-finding dialogue with companies as soon as research into an allegation is initiated. As part of this dialogue, the company is informed about the allegation and offered an opportunity to present its position. This dialogue is ongoing for as long as ISS-Ethix maintains its assessment that a company is involved in verified or alleged (and unaddressed) violations of global norms, or involved in controversial weapons. As part of this fact-finding dialogue, the company is also informed about the overall conclusion and provided with the analysis. This latter point is particularly important as ISS-Ethix recognises that companies (a) often have information that is not available through other sources, and (b) as a matter of principle, it is essential that companies have the opportunity to review and, as appropriate, challenge the assessments. The quality control function within the ESG research team supports timely, comprehensive and transparent action when errors are detected.

Companies who are within the coverage universe of certain of ISS' data products, including ISS Governance and Environment & Social QualityScore products, are invited to review, verify and provide feedback on the data used to determine their scores via a complementary a year-round data verification tool, accessed through ISS Corporate Solutions' Governance Analytics platform. Submissions of corrected or updated data factors can be made online through the platform.

We greatly value participation in stakeholder initiatives, both internally to inform the development of our research methodologies, and externally in evaluating companies in our research. This is because such initiatives have a threshold of conduct for participation, give access to shared learning on best practice from industry peers, and confirm and reaffirm the company's commitment to expected standards. In addition to standard industry initiatives, multi-stakeholder initiatives provide a risk-management framework supported by stakeholders. Furthermore, international initiatives enable a standardized and comparable disclosure structure across markets. The selection process of initiatives is stringent, and only a few are considered both reputable and relevant.

RDP 04	Mandatory	Public	Descriptive
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**RDP 04.1**

Indicate how you ensure that your ESG assessment of companies/ sectors/ geographies or similar is up-to-date and that new information is incorporated or new assessments are conducted at reasonable intervals.

- Regular update cycles (annual or more frequent)
- Allowing assessments/ ratings to be adjusted at any time by your organisation
- On-going alerts systems in place for new events and information that might have implications on the original assessment/ ratings
- On-going monitoring of possible controversies and compliance to conventions, regulations and similar
- Providing tools for companies/ sectors or others to update the researcher, rating agency or data provider with new information
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)

**RDP 04.2**

Additional information. [OPTIONAL]

ISS conducts systematic source monitoring across its research teams so that assessments and ratings can be updated as soon as new information becomes available. Additionally, all of ISS' data products are updated at least annually, with updates scheduled according to financial data release. Information about corporate events is tracked via news sources and updated as financial releases become available.

ISS-Ethix's Controversy Watch processes information about corporate involvement in ESG controversies from news and stakeholder sources. ISS-Ethix's Controversy Watch team is responsible for the review, triage and processing of news from a wide variety of sources. The team processes information about corporate involvement in ESG controversies from more than 4,400 public sources globally in 15 languages and an additional 145 expert stakeholder sources.

Further, ISS engages with certain companies who are within the coverage universe of ISS' data products as part of the standard research process. The objective of this interaction is to ensure that our research is based on the most comprehensive and accurate information available, and is for the benefit of all ISS clients. The frequency of this engagement varies by product.

Much of the information included in Governance QualityScore comes from the company's circular/proxy filing for its annual shareholder meeting, and the ISS Research teams' interpretation and proxy voting recommendations to our clients for that meeting. While companies have the ability most of the year to update information for Governance QualityScore, this ability is restricted during the time ISS is gathering the information from the proxy and preparing its proxy analysis. Once the proxy voting recommendations report is released to institutional clients, companies are able to once again review their Governance QualityScore data profiles and update/correct information.

The information in Environmental & Social QualityScore is sourced from company publications including mainstream filings, Sustainability and CSR reports, Integrated Reports, publicly available company policies and information on company websites. Confirmation of company participation in or formal endorsement of authoritative multi-stakeholder initiatives is collected from websites or member list made available by the relevant initiatives. Unlike Governance QualityScore, there is no blackout period surrounding company proxy analysis.

Online QualityScore profiles are updated once daily, at approximately 5 am Eastern. QualityScore scores, the online website may not yet reflect the updated scores and profile. The online score and profile will be updated the next day. During the year outside of the annual meeting, ISS reviews new filings to keep QualityScore up to date, incorporating changes to bylaws, adoptions and redemptions of poison pills, and other events.

Companies who are within the coverage universe of ISS Governance and Environment & Social QualityScore products, are invited to review, verify and provide feedback on the data used to determine their scores via a complementary year-round data verification tool, accessed through ISS Corporate Solutions' Governance Analytics platform. Submissions of corrected or updated data factors can be made online through the platform.

RDP 05	Mandatory	Public	Descriptive
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RDP 05.1	Indicate how you typically ensure a balanced approach to your research methodology and assessing/rating of companies/sectors/geographies or similar. Tick all that apply and explain your approach to each option.
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**Type of indicators**

- Balancing quantitative and qualitative indicators

	Explain your approach
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The indicators within the proxy research reports are those which our clients have told us they want to see and consider material. These are typically a mix of quantitative and qualitative indicators, for example when discussing executive compensation.

- Balancing management/process oriented indicators and performance indicators
- Balancing reference to past and current performances, such as whether the rating object's performance is improving or deteriorating

	Explain your approach
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In the proxy research reports, ISS will make reference to past performance where it is relevant to the holistic analysis of the resolutions.

ISS-Ethix Norm-Based Research reports will refer to prior actions if relevant, and track a trend indicator on the overall health of the engagement.

In the ISS Governance QualityScore profiles, the trend indicator highlights whether a company's performance by indicator is improving or deteriorating over time. The score graph on the front page of the report shows this graphically for the company level score, and the top-level pillar scores (board, compensation, shareholder rights and audit and risk.)

Similarly in the ISS Environmental & Social QualityScore, features trend indicators, key disclosures, key omissions, and industry alignment. The front page of reports provides a snapshot of the Environmental and Social pillar scores, and each of the four underlying category scores for each pillar.

- Balancing environmental, social and governance indicators

	Explain your approach
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As ISS seeks to empower clients in their investment, voting and engagement activities, the environmental, social and governance indicators served to them will be those they have chosen

- Balancing self-reported and public data
- Other, specify (1)
- Other, specify (2)
- None of the above

RDP 06	Mandatory	Public	Descriptive
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RDP 06.1	Describe the control processes in place to ensure quality of research.
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**Quality Management Systems and Standards**

Quality assurance routines across all ISS products build on extensive peer review throughout the

research process and strict enhanced sign-off routines, involving the relevant Team lead and the Head of Research where appropriate.

#### Issuer Engagement

ISS engages in a fact-finding dialogue with issuers covered under certain screening products, offering an opportunity for the issuer to present clarifying information.

ISS Proxy Research engages with companies to clarify anything which is not clear in the publicly available information on which the analyst bases the vote recommendations. In certain markets and subject to ISS' guidelines, a segment of companies are provided with an opportunity to review a draft of their proxy research report for purposes of verifying the factual accuracy of the report. Companies are always entitled to receive a free copy of the final proxy research report which has been published by ISS about that company and issued to subscribing clients. If a material factual error is brought to the attention of the research analyst post-publication, they will correct the error, reissue the report and issue a formal Alert which is provided to all subscribing clients who received the original report.

ISS-Ethix's Global Norms and Controversial weapons research teams establish the accuracy of any allegations against a company through active company and stakeholder dialogues. ISS-Ethix conducts fact-finding dialogue with companies as soon as research into an allegation is initiated. As part of this dialogue, the company is informed about the allegation and offered an opportunity to present its position. This dialogue is ongoing for as long as ISS-Ethix maintains its assessment that a company is involved in verified or alleged (and unaddressed) violations of global norms, or involved in controversial weapons. As part of this fact-finding dialogue, the company is also informed about the overall conclusion and provided with the analysis. This latter point is particularly important as ISS-Ethix recognises that companies (a) often have information that is not available through other sources, and (b) as a matter of principle, it is essential that companies have the opportunity to review and, as appropriate, challenge the assessments. The quality control function within the ESG research team supports timely, comprehensive and transparent action when errors are detected.

Companies who are within the coverage universe of certain of ISS' data products, including ISS Governance and Environment & Social QualityScore products, are invited to review, verify and provide feedback on the data used to determine their scores via a complementary a year-round data verification tool, accessed through ISS Corporate Solutions' Governance Analytics platform. Submissions of corrected or updated data factors can be made online through the platform.

#### Methodology Review Boards

ISS maintains a Governance Methodology Review Board and a Responsible Investment Methodology Review Board to ensure that all relevant research methodologies are in line with global norms and market trends.

Methodology reviews are conducted annually by the Methodology Review Boards, with input from cross-functional teams across the research teams and clients. The mission of the Board is to provide the clearest possible research methodology to all stakeholders and consumers of ISS products while ensuring leadership and alignment with global norms and market trends in the governance, sustainable and responsible investing industries.

Additional reviews occur following significant events, including the following:

- Normative developments (international law in particular) of relevance to ESG standards
- Statements by authoritative sources, such as UN bodies, the International Labour Organization, and multi-stakeholder initiatives
- Updates in local market regulations