

Overview

Beginning in 2023, the Communication on Progress requires participants to annually a) submit an electronic statement by the Chief Executive Officer expressing support for the UN Global Compact, and b) complete the Communication on Progress questionnaire. This reference document contains the questions.

Overall, the questionnaire is designed to add value to participants in several ways:

- Build credibility and brand value by showing their commitment to corporate sustainability, the Ten Principles, and the UN Global Compact.
- Measure and demonstrate progress to stakeholders on the Ten Principles in a consistent and harmonized manner.
- Receive insights, learn, and continuously improve performance by helping to identify gaps and inform strategies.
- Compare progress against peers with access to one of the largest sources of free, public, and comparable data.

The questionnaire is structured in five sections. The first section, Governance, provides a cross-cutting overview of the companies' sustainability governance structure. The remaining four sections, Human Rights, Labour, Environment, and Anti-Corruption, survey companies about their performance with respect to the Ten Principles of the UN Global Compact. Within each section, companies will answer questions that address processes and policies that demonstrate their commitment to progress, efforts

Notably, the Human Rights and Environment sections contain additional nuance. The Human Rights section provides companies with the opportunity to select their material topics for disclosure, while the Environment section includes additional topic-specific questions, for example on water and biodiversity, that are to be answered only by business participants who consider such topics material. This document

please note that this questionnaire may be subject to minor edits. Please refer to the digital platform for the final version. Please refer to the United Nations Global Compact *Guidelines for Communication on Progress* for additional guidance including question rationale and calculation methodology. https://info.unglobalcompact.org/1/591891/2022-01-13/49q7nw/591891/1642091777YUCS9o1k/UNGC_CoP_GuideBook.pdf

Please use this template to collect the relevant data and develop responses in preparation for future reports.

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Policies and Responsibilities

G1. Does the board/highest governance body or most senior executive of the company:

Linked to: GRI Disclosures 2-12, 2-14, 2-22 (2021)

(Select all that apply)

- Issue an annual statement about the relevance of sustainable development to the company
- Issue an annual statement that addresses impacts on both people and the environment
- Issue an annual statement highlighting a zero tolerance for corruption
- Sign off on organizational sustainability targets
- Supervise Environmental, Social, and Governance reporting
- Regularly review potential risks related to the business model
- None of the above

Please provide additional information: *_The Charity's annual report includes a statement address*

G2. Does the company have a publicly stated commitment regarding the following sustainability

Linked to: GRI Disclosure 2-23 (2021)

(Select one answer option per line)

	No, this is not a current priority	No, but we plan to within the next two years	Yes, focused on our own operations	Yes, focused on our own operations and suppliers	Yes, and focused on our own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)
Human Rights	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labour Rights/Decent Work	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Anti-Corruption	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information:

ClientEarth is an international environmental law organisation that focuses on using the law t

G3. Does the company have a code of conduct in place regarding each of the following sustainab

Linked to: NASDAQ G6.1; GRI Disclosure 2-23 (2021)

(Select one answer option per line)

	No, this is not a current priority	No, but we plan to within the next two years	Yes, focused on employees	Yes, focused on employees and suppliers	Yes, focused on own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)
Human Rights	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labour Rights / Decent Work	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>
Anti-Corruption	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>

Please provide additional information: As stated, we have an Anti-Bribery, Anti-Fraud and Anti-Corruption Policy

G4. Has the company appointed an individual or group responsible for each of the following sus

Linked to: GRI Disclosure 2-13 (2021)

(Select one answer option per line)

	No one is specifically responsible for this topic	Yes, with limited influence on outcomes (e.g., limited access to internal information, limited decision-making authority)	Yes, with moderate influence on outcomes (e.g., has access to relevant information, reports to senior manager)	Yes, with direct influence of some outcomes (e.g., has access to relevant information, includes one or more senior manager with decision making rights)	Yes, with direct influence at the highest levels of the company (e.g., has access to relevant information, includes most senior members of company)
Human Rights	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labour Rights / Decent Work	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
Environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
Anti-Corruption	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>

Please provide additional information: ClientEarth's People & Culture team, headed by its Chi

G5. Does the company have a formal structure(s) (such as a cross-functional committee) to addr

Linked to: GRI Disclosures 2-9, 2-13 (2021)

(Select one answer option per line)

		Yes, with limited influence on outcomes	Yes, with moderate influence on outcomes	Yes, with direct influence on some outcomes	
	No formal structure	(e.g., limited access to internal information necessary to understand risks, poor representation from relevant departments or functions)	(e.g., includes representatives of some functions, departments, or business units most relevant for addressing the risks concerned, has access to relevant information, reports to senior manager)	(e.g., includes representatives of functions, departments, or business units most relevant for addressing the risks concerned, has access to relevant information, involves one or more members of senior management)	Yes, with direct influence at the highest level of the company (e.g., full access to relevant information, involves members at highest level of company)
Human Rights	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labour Rights / Decent Work	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
Environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
Anti-Corruption	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information: _____

Prevention

G6. Does the company have a process(es) to assess risk?

Linked to: GRI Disclosure 205-1 (2016)

(Select one answer option per line)

	No, this is not a current priority	No, but we plan to within the next two years	Yes, related to our own operations	Yes, related to our own operations and suppliers	Yes, related to our own operations and the value chain (including suppliers, consumers, communities, other business relationships)
				[Prompts G6.1]	[Prompts G6.1]
Human rights risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
Labour rights risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>

Environmental risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Corruption risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please provide additional information: ClientEarth maintains and updates (quarterly) a risk r

G6.1. During the assessment of risk, has the company identified those suppliers and/or other b
(Select one answer option per line)

	No	Yes
Human rights risks	<input type="radio"/>	<input checked="" type="radio"/>
Labour rights risks	<input type="radio"/>	<input checked="" type="radio"/>
Environmental risks	<input type="radio"/>	<input checked="" type="radio"/>
Corruption risks	<input type="radio"/>	<input checked="" type="radio"/>

Please provide additional information: Where possible and appropriate, ClientEarth has identi

G7. Does the company have a due diligence process through which it identifies, prevents, mitig
Linked to: GRI Disclosures 2-12, 2-23-a-ii, 3-1, 3-3-d (2021)
(Select one answer option per line)

	No, this is not a current priority	No, but we plan to within the next two years	Yes, related to our own operations	Yes, related to our own operations and suppliers [Prompts G7.1]	Yes, related to our own operations and the value chain (including suppliers, consumers, communities, other business relationships) [Prompts G7.1]
Human rights risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Labour rights risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Environmental risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Corruption risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please provide additional information: ClientEarth has a comprehensive due diligence process

G7.1. During the due diligence process, has the company identified those suppliers and/or othe
Linked to: GRI Disclosures 2-23-e, 3-1 (2021)
(Select one answer option per line)

	No	Yes
Human rights risks	<input type="radio"/>	<input checked="" type="radio"/>
Labour rights risks	<input type="radio"/>	<input checked="" type="radio"/>
Environmental risks	<input type="radio"/>	<input checked="" type="radio"/>
Corruption risks	<input type="radio"/>	<input checked="" type="radio"/>

Please provide additional information: Where possible and appropriate, ClientEarth has identified

Concerns and Grievance Mechanisms

G8. Does the company have a process(es) through which members of the company's workforce can report concerns and grievances?
 Linked to: [Reporting Guidance on the 10th Principle Against Anti-corruption - B3; GRI Disclosure 2-26 \(2021\)](#)
 (Select one answer option per line)

	No, this is not a current priority	No, but we plan to within the next two years	Yes, we have an informal process (e.g., through supervisors, others) [Prompts G8.1]	Yes, we have a formal process [Prompts G8.1]	
Human rights risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
Labour rights risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Environmental risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Corruption risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please provide additional information: ClientEarth has a formal whistleblowing channel that is

If respondent answers either of the 'Yes' options in G8, the below question will be displayed.

G8.1. Please provide additional detail regarding the process(es) the company has through which concerns and grievances are reported.
 Linked to: [GRI Disclosure 2-26 \(2021\)](#)
 (Select one answer option per line)

	No	Yes
Is the process communicated to all employees/workers in local languages?	<input type="radio"/>	<input checked="" type="radio"/>

Is the process available to non-employees (e.g., suppliers, consumers, communities, and other business relationships)?	<input type="radio"/>	<input checked="" type="radio"/>
Is the process confidential (e.g., whistleblowing process)?	<input type="radio"/>	<input checked="" type="radio"/>
Are there processes in place to avoid retaliation?	<input type="radio"/>	<input checked="" type="radio"/>
Can concerns be raised about suppliers or other business relationships (e.g., clients, partners, etc.)	<input type="radio"/>	<input checked="" type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>

Please provide additional information: ClientEarth has a formal whistleblowing channel that allow:

Lessons

G9. How does the company capture lessons regarding each of the following sustainability topics

Linked to: GRI Disclosure 3-3-e (2021)

(Select one answer option per line)

	No lessons are regularly captured	Conducts investigation/review of incidents as needed	Conducts investigation/review of incidents and changes organizational policies, processes, and practices accordingly	Conducts investigation/review and leverages learnings to influence both internal and external affairs
Human Rights	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Labour Rights / Decent Work	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Environment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Anti-Corruption	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please provide additional information: _____

Executive Pay

G10. Is executive pay linked to performance on one or more of the following sustainability top
 Linked to: [CDP W6.4 2022](#), [CDP F4.3a 2022](#), [CDP C1.3a \(2022\)](#); [Nasdaq G3 2335](#); [GRI Disclosure 2-1](#)
 (Select one answer option per line)

	No, this is not a current priority	No, but we plan to within the next two years	Yes
Human Rights	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labour Rights / Decent Work	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Anti-Corruption	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information: _____

Board Composition

G11. Please provide details regarding the company's board/highest governance body.
 Linked to: [ISAR D.1.2.](#), [ISAR D.1.3.](#); [GRI Disclosures 2-9 \(2021\)](#), [405-1 \(2016\)](#)
 (Percentage & Commentary for each line)

	Number	Not applicable
Total number of board members (#)	16	<input type="radio"/>
Male (%)	56%	<input type="radio"/>
Female (%)	44%	<input type="radio"/>
Non-binary (%)	0%	<input type="radio"/>
Under 30 years old (%)	_____	<input type="radio"/>
30-50 years old (%)	_____	<input type="radio"/>
Above 50 years old (%)	_____	<input type="radio"/>
From minority or vulnerable groups (%)	_____	<input type="radio"/>
Executive (%)	_____	<input type="radio"/>
Independent (%)	100%	<input type="radio"/>

Please provide additional information: We do not currently have updated EDI data on our Board

Data Assurance

G12. Do you produce sustainability reporting according to:

Linked to: Nasdaq G9.1

(Select all that apply)

- X National/local regulation on sustainability
 - Security exchange regulations
 - Non-Financial Reporting Directive of the European Union (NRFD)/Corporate Sustainability Reporting Directive (CSRD)
 - Global Reporting Initiative (GRI)
 - Sustainability Accounting Standards Board (SASB, now consolidated into the IFRS Foundation)
 - International Integrated Reporting Council (IIRC, now consolidated into the IFRS Foundation)
 - Climate Disclosure Standards Board (CDSB, now consolidated into the IFRS Foundation)
 - Task Force on Climate-related Financial Disclosures (TCFD)
 - Other voluntary frameworks (please specify in text box) *[Makes text box mandatory]*
 - No sustainability reporting according to any frameworks nor regulations outside of this category

Please provide additional information: ClientEarth have taken guidance from the UK Government Environmental

G13. Is the information disclosed in this questionnaire assured by a third-party?

Linked to: CDP C10.1 2022; GRI Disclosure 2-5 (2021)

(Select all that apply)

- Limited assurance for minority of metrics (e.g., GHG emissions only)
- Limited assurance for majority of metrics
- Reasonable assurance from minority of metrics
- Reasonable assurance for majority of metrics
- Other (Please provide additional information) *[Makes text box mandatory]*
- X No assurance for any metrics

Please provide additional information: _____



essing its impacts on people and the environment, its sustainability targets and its ESG reporting,

o drive transformational change, creating, strengthening and enforcing the legal frameworks in the

ruption policy (posted on our Transparency page of our website), as well as an Environmental Policy (also pos

ief People and Operations Officer, is primarily responsible for ensuring labour rights and a decent

register identifying all risks affecting its operations, reputation, regulatory compliance, financial

business relationships where the risk related to human rights, labour, environment and/or anti-corru

ified risks arising out of specific partner relationships or activities within certain geographies.

s for all new contracts and partnerships, which includes an assessment of relevant sustainabilty f


r business relationships where the risk of adverse impacts on human rights, labour, environment and

allows for identified or anonymous reporting of any issue that may be a breach of law or of a Client

s for identified or anonymous reporting of any issue that may be a breach of law or of a ClientEarth policy or its

i, due to recent high levels of turnover (due to term limits). Once incoming board members complet

1 Reporting Guidance , the Greenhouse Gas Protocol (GHG) Reporting Protocol - Corporate Standard, a



jurisdictions where ClientEarth works, as well as internationally, to support a healthy planet where nat

ted on our Transparency page). These Policies apply to all staff. In addition, all governance board members and all r

work environment for all staff. ClientEarth's Director of Operations is primarily responsible for track

al stability, etc. Risks include those arising from People & Culture concerns, our sustainability / effc

s values. It is publicly available on our website to any partner, funder, supplier, or member of the public, as well as in

and from the UK Government GHG Conversion Factors for Company Reporting document for calculating carbon e



ure and people can thrive together. We have an Anti-Bribery, Anti-Fraud and Anti-Corruption policy (post

management board members sign a Code of Conduct, by which they commit to uphold ClientEarth's values, operate

ing and reporting on ClientEarth's environmental impacts, and adopting / improving policies and procedures

internally on our sharepoint site to all staff. The system prompts and explanations have been translated into the language



ted on our Transparency page of our website), as well as an Environmental Policy (also posted on our Tran

in accordance with its strategies, and follow its policies and procedures. There is no staff code of conduct.

es to continue to reduce that impact over time. ClientEarth's Finance team, led by the Chief Financial Of

anguages used in each of our offices, and Reports can be made in up to 12 different languages. The process for investig:



Officer, is primarily responsible for the Anti-Bribery, Anti-Corruption and Anti-Fraud Policy, any investi

ation of Report minimizes the risk of retaliation, by providing for confidentiality (anonymity is also possible) and an in



gations conducted or reports made under it, and the internal controls and processes to identify corruptic

Independent investigation. A Report can be made on any topic related to ClientEarth, including its partners. The Whis



Whistleblowing channel and policy are available on ClientEarth's Transparency page on its website.

Human Rights

Materiality/Saliency

HR1. Which of the following has the company identified as material human rights topics connect

Linked to: GRI Disclosure 3-2 (2021)

(Select all that apply)

- Freedom of association and the effective recognition of the right to collective bargaining
- Child labour
- Forced labour
- Non-discrimination in respect of employment and occupation
- Safe and healthy working environment
- Working conditions (wages, working hours) [Prompts additional line 'Working conditions (wages, working hours)' in Questions HR2–HR7]
- Freedom of expression [Prompts additional line 'Freedom of expression' in Questions HR2–HR7]
 - Access to water and sanitation [Prompts additional line 'Access to water and sanitation']
- Digital security / privacy [Prompts additional line 'Digital security / privacy' in Questions HR2–HR7]
- Gender equality and women's rights [Prompts additional line 'Gender equality and women's rights' in Questions HR2–HR7]
- Rights of indigenous peoples [Prompts additional line 'Rights of indigenous peoples' in Questions HR2–HR7]
 - Rights of refugees and migrants [Prompts additional line 'Rights of refugees and migrants']
 - Other [Textbox Mandatory]

Please provide additional information: Several ClientEarth offices are unionised. Wages and

Note: Labour rights topics (Freedom of association and the effective recognition of the right

Commitment

HR2. Does the company have a policy commitment in regarding the following human rights topics?

Linked to: GRI Disclosures 2-23-a-iv, 2-23-b, 3-3-c (2021)

(Select one answer option per line)

	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-
Freedom of expression	X	<input type="radio"/>	<input type="radio"/>
Access to water and sanitation	X	<input type="radio"/>	<input type="radio"/>
Digital security / privacy	<input type="radio"/>	<input type="radio"/>	X
Gender equality and women's rights	<input type="radio"/>	<input type="radio"/>	X
Rights of indigenous peoples	X	<input type="radio"/>	<input type="radio"/>
Rights of refugees and migrants	X	<input type="radio"/>	<input type="radio"/>

Please provide additional information: _____

Please input the year the relevant human rights policy was last reviewed

	Year (YYYY)
Freedom of expression	2024

Access to water and sanitation	N/A
Digital security / privacy	2024
Gender equality and women's rights	2024
Rights of indigenous peoples	N/A
Rights of refugees and migrants	N/A

Please provide additional information: _____

If respondent answers 'Yes' in HR2, the below question will be displayed for each relevant top HR2.1. For each human rights policy commitment, is it:
 Linked to: GRI Disclosures 2-23-c, 2-23-d, 2-23-e (2021)
 (Select all that apply for each line)

	Aligned with international human rights standards	Publicly available	Approved at most senior level of the company	Applied to the company's own operations	Applied to the company's own operations and suppliers	Applied to the company's own operations and the value chain (e.g., suppliers, consumers,
Freedom of expression	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to water and sanitation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digital security / privacy	<input checked="" type="checkbox"/>	<input type="radio"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="radio"/>
Gender equality and women's rights	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="radio"/>	<input type="radio"/>
Rights of indigenous peoples	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rights of refugees and migrants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information: _____

Prevention

HR3. Within the reporting period, has the company engaged with potentially affected stakeholders
 Linked to: GRI Disclosures 3-1-b, 3-3-f (2021)
 (Select one answer option per line)

No	To better understand	To discuss potential	To agree on a way to	To assess progress in	To collaborate
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	engagement on this topic	understand the risks/impacts in question	ways to prevent or mitigate the risks/impacts in question	prevent/mitigate the risks/impacts in question	preventing/mitigating the risks/impacts in question	in the prevention/mitigation of the risks/
Freedom of expression	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to water and sanitation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digital security / privacy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Gender equality and women's rights	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rights of indigenous peoples	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rights of refugees and migrants	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information: _____

HR4. What type of action has the company taken within the reporting period with the aim of pre
 Linked to: [GRI Disclosure 3-3-d \(2021\)](#)
 (Select all that apply for each line)

	No action within reporting period	Provided internal training/capacity building for the direct workforce	Built capacity among relevant business relationships (e.g., partners, suppliers, clients, etc.)	Conducted an audit process and/or corrective action plan	Collective action with peers or other stakeholders to address the issue	Collaborated with governmental or regulatory bodies
Freedom of expression	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to water and sanitation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digital security / privacy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Gender equality and women's rights	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rights of indigenous peoples	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>
Rights of refugees and migrants	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information: _____

HR5. Who receives training for the following human rights topics? Matrix will be populated on
 Linked to: [GRI Disclosure 3-3-d \(2021\)](#)

(Select all that apply for each line)

	No training provided	Select employees	All employees	Contractors	Direct suppliers	Indirect suppliers
Freedom of expression	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to water and sanitation	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digital security / privacy	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Gender equality and women's rights	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rights of indigenous peoples	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rights of refugees and migrants	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional :We work on indigenous people's rights (in our forestry work). All

HR6. How does the company assess progress in preventing/mitigating the risks/impacts associate

Linked to: GRI Disclosure 3-3-e (2021)

(Select one answer option per line)

	No monitoring of progress	Review topics on ad hoc basis	Set annual targets/ goals, track progress over time (internal programmes only)	Set annual targets/ goals, track progress over time (internal and external programmes)	Other (Please provide additional information) [Makes text box mandatory]
Freedom of expression	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to water and sanitation	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digital security / privacy	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>
Gender equality and women's rights	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>
or girls	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rights of indigenous peoples	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>
Rights of refugees and migrants	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information: _____

Response and Reporting

HR7. Within the reporting period, has the company been involved in providing or enabling remed

Linked to: GRI Disclosure 3-3-d-ii (2021)

(Select one answer option per line)


	No remedy provided/ enabled	Yes, remedy provided/ enabled	No adverse impact identifid or caused	Choose to not disclose
Freedom of expression	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
Access to water and sanitation	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
Digital security / privacy	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
Gender equality and women's rights	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
Rights of indigenous peoples	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
Rights of refugees and migrants	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>

Please provide additional information: _____

HR8. Briefly describe additional relevant, practical actions the company has taken within the

Linked to: GRI Disclosures 3-3-c and 3-3-d (2021)

(Text box)



ed with its operations and/or value chain, whether based on their salience (e.g., the most severe poten

working conditions are important topics to our staff, and include issues such as the right to work from
to *collective bargaining, child labour, forced labour, non-discrimination in respect of employment and*

ic.

Developed involving human rights expertise outside the company	Other (Please provide additional information) <i>[Makes text box mandatory]</i>
--	--

-
- | | |
|-----------------------|-----------------------|
| <input type="radio"/> | <input type="radio"/> |
| <input type="radio"/> | <input type="radio"/> |
| <input type="radio"/> | <input type="radio"/> |
| <input type="radio"/> | <input type="radio"/> |
| <input type="radio"/> | <input type="radio"/> |
| <input type="radio"/> | <input type="radio"/> |

rs or their legitimate representatives in relation to the following human rights topics? Matrix will be

venting/mitigating the risks/impacts associated with the following human rights topics? Matrix will be

Other
(Please
provide
additional
information
in the
mandatory
text box)

y for the human rights topics selected in HR1.

Other -
such as
partners,
clients,
etc.

staff receive Data Privacy training annually. We do not have specific training modules in the other ar


d with the following human rights topics? Matrix will be populated only for the human rights topics sel

y where it has caused or contributed to adverse impact(s) associated with the following human rights to


reporting period and/or plans to take to implement the human rights principles, including any challenge



1 home and work remotely from outside the country of employment, the number of hours (and days per week) ,
occupation, and a safe and healthy working environment) are a subset of human rights and for completeness:



of work, the availability of collective leave, etc. As an NGO, ClientEarth also pays staff a reasonable
s, were included in this question. Regardless of these labour topics being selected as material in this q



wage, but one that is lower than the amounts they could typically make in a commercial company. Freedom
question or not, all companies will be asked to provide additional details about these labour rights topic



of expression issues arise because we are a charity that cannot take party-political positions and must k
cs in the next section (L.1 and following). For the other human rights topics selected as material in thi



be compliant with lobbying regulations (which include campaigning efforts) in various countries. Thus, our



r policies take a pragmatic approach to balancing staff rights against the organisation's regulatory obli



.gations. Finally, as a globally operating company, ClientEarth needs to be conscious of its digital sec



urity and privacy (of staff, partners, donors, etc.) in all jurisdictions in which we operate.

Labour

Commitment

L1. Does the company have a policy commitment regarding the following labour rights principles

Linked to: GRI Disclosure 3-3-c (2021) for topics GRI 407 (2016), GRI 409 (2016), GRI 408 (2016)
 (Select one answer option per line)

No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy [Prompts L1.1]	Not applicable (Please provide additional information in the mandatory text box)
--	--	---	--

	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy [Prompts L1.1]	Not applicable (Please provide additional information in the mandatory text box)
Freedom of association and the effective recognition of the right to collective bargaining	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Forced labour	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Child labour	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-discrimination in respect of employment and occupation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Safe and healthy working environment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Working conditions (wages, working hours)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please provide additional information: _____

Please input the year the relevant labour rights policy was last reviewed

Year (YYYY)

Freedom of association and the effective recognition of the right to collective bargaining	2024
--	------

Forced labour _____
 Child labour _____
 Non-discrimination in respect of employment and occupation 2024
 Safe and healthy working environment 2023
 Working conditions (wages, working hours) 2024

Please provide additional information: _____

If respondent answers 'Yes' in L1, the below question will be displayed for each relevant top L1.1. For each labour rights policy commitment, is it:
 Linked to: ILO C155 - Occupational Safety and Health Convention 1981 (No. 155); GRI Disclosure (Select all that apply for each line)

	Aligned with international labour standards	Publicly available	Approved at most senior level of the company	Applied to the company's own operations	Applied to the company's own operations and suppliers	Applied to the company's own operations and the value chain (e.g., suppliers, consumers)
Freedom of association and the effective recognition of the right to collective bargaining	X	X	X	X	O	O
Forced labour	O	O	O	O	O	O
Child labour	O	O	O	O	O	O
Non-discrimination in respect of employment and occupation	X	X	X	X	X	O
Safe and healthy working environment	X	X	X	X	O	O

Working conditions (wages, working hours)

X X X X O O

Please provide additional information: _____

L1.2. Does the company's policy on freedom of association and collective bargaining:

Linked to: ILO, Freedom of Association and Protection of the Right to Organise Convention, 1948 (Select all that apply)

- Reference the respect for the right of all workers to form and join a trade union
- Prohibit any acts of interference in trade unions
- Facilitate collective bargaining with the trade union representatives
- Provide trade union representatives with the information required for meaningful collective bargaining
- Reference the respect for the right of workers to submit grievances without suffering retaliation
- We do have a policy on freedom of association or collective bargaining but it does not cover all workers
- We do not have a policy on freedom of association or collective bargaining

Please provide additional information: _____

Prevention

L2. Within the reporting period, has the company engaged with potentially affected stakeholder

Linked to: GRI Disclosures 3-1-b and 3-3-f (2021) for topics GRI 407 (2016), GRI 409 (2016), GRI 413 (2016) (Select one answer option per line)

No engagement on this topic	To better understand the risks/impacts in question	To discuss potential ways to prevent or mitigate the risks/impacts in question	To agree on a way to prevent/mitigate the risks/impacts in question	To assess progress in preventing/mitigating the risks/impacts in question	To collaborate in the prevention/mitigation of the risks/impacts in question
-----------------------------	--	--	---	---	--

Freedom of association and the effective recognition of the right to collective bargaining	O	O	O	O	O	O
Forced labour	O	O	O	O	O	O
Child labour	O	O	O	O	O	O
Non-discrimination in respect of employment and occupation	O	X	X	X	X	X
Safe and healthy working environment	X	O	O	O	O	O

Working conditions (wages, working hours)

Please provide additional information: _____

L3. What type of action has the company taken within the reporting period with the aim of preventing the occurrence of the issue? *Linked to: GRI Disclosure 3-3-d (2021) for topics GRI 407 (2016), GRI 409 (2016), GRI 408 (2016)* (Select all that apply for each line)

	No action within reporting period	Provided internal training/capacity building for the direct workforce	Built capacity among relevant business relationships (e.g., suppliers, consumers, communities)	Conducted an audit process and/or corrective action plan	Collective action with peers or other stakeholders, in particular workers' organizations, to address the issue	Collaborated with governmental or regulatory bodies
Freedom of association and the effective recognition of the right to collective bargaining	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forced labour	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Child labour	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-discrimination in respect of employment and occupation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safe and healthy working environment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Working conditions (wages, working hours)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information: We have actively worked with our own internal unions (in Poland, Br

L4. Who receives training for the following labour rights topics? *Linked to: GRI Disclosure 3-3-d (2021) for topics GRI 407 (2016), GRI 409 (2016), GRI 408 (2016)* (Select all that apply for each line)

Labour Topics:	No training provided	Select employees	All employees	Contractors	Direct suppliers	Indirect suppliers

Freedom of association and the effective recognition of the right to collective bargaining	<input type="radio"/>	<input checked="" type="checkbox"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forced labour	<input checked="" type="checkbox"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Child labour	<input checked="" type="checkbox"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-discrimination in respect of employment and occupation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="checkbox"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safe and healthy working environment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="checkbox"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Working conditions (wages, working hours)	<input checked="" type="checkbox"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information: _____

L5. How does the company assess progress in preventing/mitigating the risks/impacts associated
 Linked to: [GRI Disclosure 3-3-e \(2021\)](#) for topics [GRI 407 \(2016\)](#), [GRI 409 \(2016\)](#), [GRI 408 \(2016\)](#)
 (Select one answer option per line)

	No monitoring of progress	Review topics on ad hoc basis	Set annual targets/ goals, track progress over time (internal programmes only)	Set annual targets/ goals, track progress over time (internal and external programmes)	Other (Please provide additional information) [Makes text box mandatory]
Freedom of association and the effective recognition of the right to collective bargaining	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="checkbox"/>
Forced labour	<input checked="" type="checkbox"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Child labour	<input checked="" type="checkbox"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Non-discrimination in respect of employment and occupation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safe and healthy working environment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Working conditions (wages, working hours)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information: We actively engage with our own staff unions on relevant matters.

Performance

L6. Do(es) the existing collective bargaining agreement(s) provide(s) more favourable rights than the law? (Select all that apply)

- Yes, by providing more favourable conditions related to wages
- Yes, by providing more favourable conditions related to working hours
- Yes, by providing more favourable conditions related to health coverage and/or sick leave
- Yes, by providing additional rights not otherwise provided (Please provide additional information) *(Makes text box mandatory)*
- There is (are) no existing collective bargaining agreement(s)
- No

Please provide additional information: We have additional benefits in supporting the income of our employees.

L7. Within the reporting period, what was the percentage of women in managerial positions? (%)
Linked to: ISAR C.1.1.

	Percent women (%) (Please input a whole number e.g., 50% = 50)	Unknown
Managerial position	71%	<input type="radio"/>

Please provide additional information: _____

L8. What was the average ratio of the basic salary and remuneration of women to men (comparing women's to men's)? (%)
Linked to: GRI Disclosure 405-2 (2016)

	Salary ratio (%) (Please input a number)	Unknown	Choose to not disclose
Women / Men (%)	_____	<input checked="" type="radio"/>	<input type="radio"/>

Please provide additional information: The question is unclear, even after consulting GRI 405-2. The latest data is not available.

L9. Within the reporting period, how frequently were workers injured (injuries per hour worked)?
Linked to: ISAR C.4.2; GRI Disclosure 403-9 (2018)

	Frequency of injury	Unknown	Choose to not disclose
Frequency of injury	0	<input type="radio"/>	<input checked="" type="radio"/>

Please provide additional information: _____

L10. Within the reporting period, what was the company's incident rate (injuries per worker)?

Linked to: ISAR C.4.2; GRI Disclosure 403-9 (2018)

	Incident rate	Unknown	Choose to not disclose [Makes text box mandatory]
Incident rate	0.00%	<input type="radio"/>	<input type="radio"/>

Please provide additional information: _____

Response and Reporting

L11. Within the reporting period, has the company been involved in providing or enabling remed

Linked to: GRI Disclosure 3-3-d-ii (2021) for topics GRI 407 (2016), GRI 409 (2016), GRI 408 (Select one answer option per line)

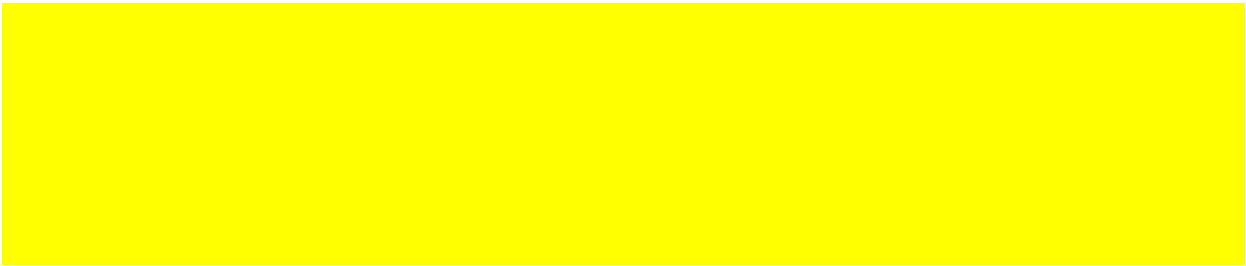
	No remedy provided/enabled	Yes, remedy provided/enabled	No adverse impact identified or caused	Choose to not disclose [Makes text box mandatory]
Freedom of association and the effective recognition of the right to collective bargaining	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Forced labour	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Child labour	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Non-discrimination in respect of employment and occupation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Safe and healthy working environment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Working conditions (wages, working hours)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please provide additional information: _____

L12. Briefly describe additional relevant, practical actions the company has taken within the
Linked to: GRI Disclosures 3-3-c and 3-3-d (2021) for topics GRI 407 (2016), GRI 409 (2016), G
(Text box)



? For the user, the "Working conditions (wages, working hours)" option would be visible only if s



ic.

is 2-23-c, 2-23-d, 2-23-e (2021)

Developed in consultation with workers and their representati ves	Developed involving labour rights expertise from inside and outside	Other (Please provide additiona l informati [Makes text box mandatory]
--	---	--

x

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x

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8 (No. 87); GRI Disclosure 2-30 (2021)

n of their choice without fear of intimidation or reprisal and protect workers against acts of a

bargaining in the context of bona fide negotiations

ering

es not include any of these details

s or their legitimate representatives in relation to the following labour rights topics? For the
GRI 408 (2016), GRI 406 (2016), GRI 403 (2018)

Other
(Please
provide
additional
information)

[Makes text
box
mandatory]

x

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o

enting/mitigating the risks/impacts associated with the following labour rights topics? For the u
6), GRI 406 (2016), GRI 403 (2018)

Other
(Please
provide
additional
information)

[Makes text
box
mandatory]

ussels, Madrid and London) on relevant issues. We have engaged in other activities around non-di
onditions (wages, working hours)" option would be visible only if selected in HR1.
6), GRI 406 (2016), GRI 403 (2018)

Other -
such as
partners,
clients,
etc.

○

○

○

○

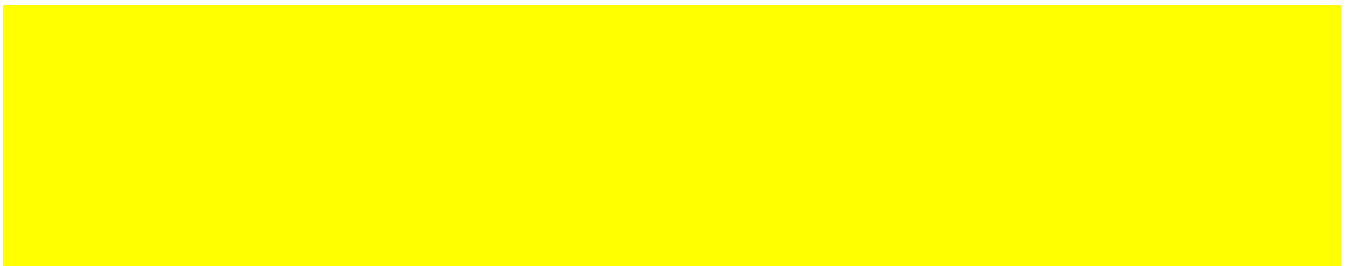
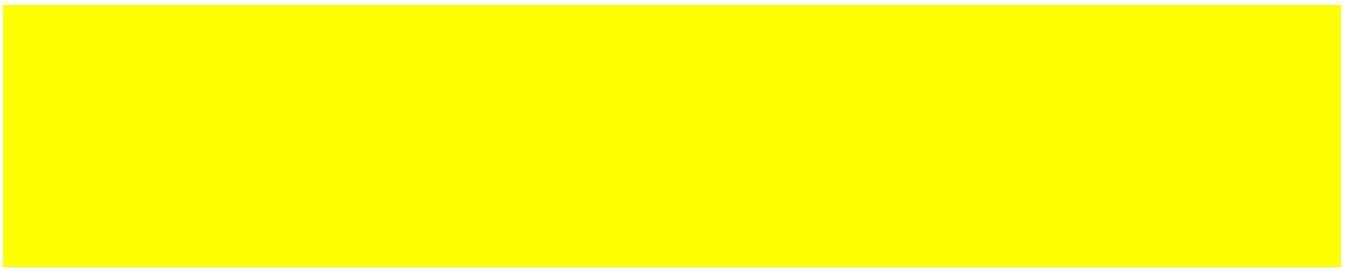
○

○

! with the following labour rights topics? For the user, the "Working conditions (wages, working h
6), GRI 406 (2016), GRI 403 (2018)

ly where it has caused or contributed to adverse impact(s) associated with the following labour ri

reporting period and/or plans to take to implement the labour rights principles, including any ch





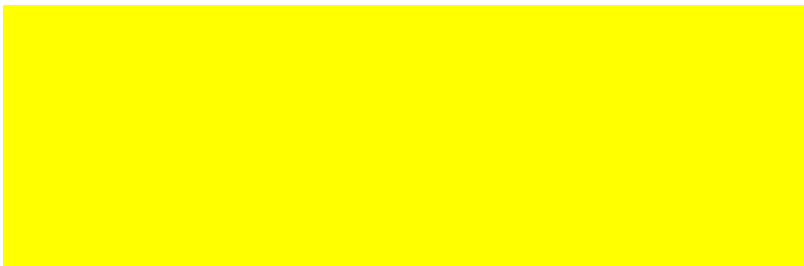
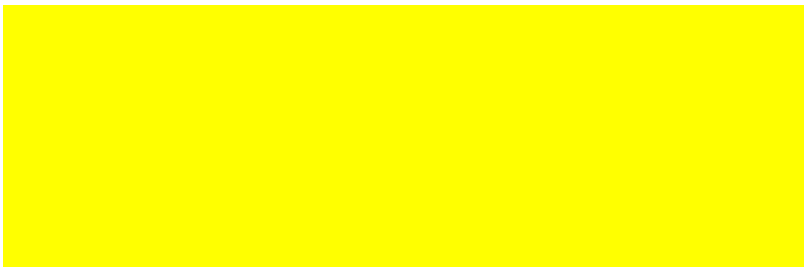
user, the "Working conditions (wages, working hours)" option would be visible only if selected in HR1.



ser, the "Working conditions (wages, working hours)" option would be visible only if selected in HR1.

scrimination under our operative Equalify, Diversity and Inclusion Strategy. We are working on a 2025 re

ghts topics? For the user, the "Working conditions (wages, working hours)" option would be visible only i



efresh of benchmarking on wages, working hours and conditions.

Environment

Commitment

E1. Does the company have a policy commitment on the following environmental topics?

Linked to: CDP C4.1 2022, CDP F6.1 2022, CDP W6.1 2022; GRI Disclosure 3-3-c (2021) for topics (Select one answer option per line)

	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy [Prompts E1.1]	Not applicable (Please provide additional information in the mandatory text box)
Climate change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Oceans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forests/Biodiversity/Land use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air pollution waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy & resource use	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please provide additional information: _____

Please input the year the relevant environment policy was last reviewed

	Year (YYYY)
Climate change	_____
Water	_____
Oceans	_____
Forests/Biodiversity/Land use	_____
Air pollution waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	_____
Energy & resource use	2024

Please provide additional information: _____

waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy & resource use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information: _____

E3. What type of action has the company taken within the reporting period with the aim of preventing or reducing the risks/impacts associated with the following topics?
 Linked to: [GRI Disclosure 3-3-d \(2021\)](#) for topics [GRI 303 \(2018\)](#), [GRI 304 \(2016\)](#), [GRI 305 \(2016\)](#)
 (Select all that apply for each line)

	No action within reporting period	Provided internal training/capacity building for the direct workforce	Built capacity among relevant business relationships (e.g., suppliers, consumers, communities)	Conducted an audit process and/or corrective action plan	Collective action with peers or other stakeholders to address the issue	Collaborated with governmental or regulatory bodies
Climate change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Oceans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forests/Biodiversity/Land use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy & resource use	<input type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>

Please provide additional information: _____

E4. How does the company assess progress in preventing/mitigating the risks/impacts associated with the following topics?
 Linked to: [GRI Disclosure 3-3-e \(2021\)](#) for topics [GRI 303 \(2018\)](#), [GRI 304 \(2016\)](#), [GRI 305 \(2016\)](#)
 (Select one answer option per line)

	No monitoring of progress	Review topics on ad hoc basis	Set annual targets/goals, track progress over time (internal programmes only) [Prompts E4.1 and E4.2]	Set annual targets/goals, track progress over time (internal and external programmes) [Prompts E4.1 and E4.2]	Other (Please provide additional information) [Makes text box mandatory]
Climate Change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Oceans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forests/Biodiversity/Land use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy & resource use	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide additional information: _____

If respondent answers in E4 that they set annual targets, the below question will be displayed
E4.1. For each environmental topic for which the company sets timebound goals/targets, what key performance indicators (KPIs) are used to track progress?
 Linked to: CDP F6.1 2022; GRI Disclosure 3-3-e (2021) for topics GRI 303 (2018), GRI 304 (2016)
 (Text box for each line)

Climate change _____
 Water _____
 Oceans _____
 Forests/biodiversity/land use _____
 Air pollution _____
 Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.) _____

Energy & resource use Intensity targets set for 8.5% annual reduction in CO2 emissions from 2019

Please provide additional information: _____

If respondent answers in E4 that they set annual targets, the below question will be displayed
E4.2. For each environmental topic in which the company sets timebound goals/targets, how is progress tracked?

Linked to: GRI Disclosure 3-3-e (2021) for topics GRI 303 (2018), GRI 304 (2016), GRI 305 (2016)
 (Select all that apply for each line)

	Progress is reviewed against goals annually or more frequently	Progress is reported internally to the most senior level	Progress is reported externally	Other (Please provide additional information) [Makes text box mandatory]
Climate change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Oceans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forests/Biodiversity/Land use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy & resource use	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please provide additional information: _____

E5: Within the reporting period, has the company been involved in providing or enabling remedy
 Linked to: GRI Disclosure 3-3-d-ii (2021) for topics GRI 303 (2018), GRI 304 (2016), GRI 305 (2016)
 (Matrix - Select one answer option per line)

	No remedy provided/enabled	Yes, remedy provided/enabled	No adverse impact identified or caused	Choose to not disclose
Climate change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Oceans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forests/Biodiversity/Land use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Energy & resource use

Please provide additional information: _____

Climate Action

E6. What were the company's gross Scope 1 and/or Scope 2 global greenhouse gas (GHG) emissions

Linked to: CDP C6.1 2022, CDP C6.3 2022, CDP C6.5 2022; GRI Disclosures 305-1, 305-2, 305-3 (2 (Select one answer option per line)

	Measured total emissions (tCO2e)	We did not measure our gross emissions (Please provide additional information) [Makes text box mandatory]	<input type="radio"/>
Scope 1 emissions	2.03	<input type="radio"/>	<input type="radio"/>
Scope 2 emissions	29.86	<input type="radio"/>	<input type="radio"/>

Please provide additional information: _Data for calendar year 2023

E7. What were the company's gross Scope 3 global greenhouse gas (GHG) emissions within the rep

Linked to: CDP C6.5 2022; GRI Disclosure 305-3 (2016)

(Multiple Choice - Select one)

We measured Scope 3 GHG emissions [Please input the measured tCO2e in the text box below] [P

We did not measure Scope 3 GHG emissions

Please provide additional information: _Total Scope 3 emissions = 1860 tCO2e

If respondent answers in E7 that they measure Scope 3 emissions, the below question will be di

E7.1. Which Scope 3 categories are included in the company's Scope 3 emissions calculation?

Linked to: GRI Disclosure 305-3 (2016); CDP C6.5 2022

(Select all that apply)

- Purchased goods and services
- Capital goods
- Fuel- and energy-related activities
- Upstream transportation and distribution
- Waste generated in operations
- Business travel
- Employee commuting
- Upstream leased assets
- Downstream transportation and distribution
- Processing of sold products
- Use of sold products
- End-of-life treatment of sold products
- Downstream leased assets
- Franchises
- Investments
- Other - upstream
- Other - downstream

Please provide additional information: _

E8. What percentage of the company's revenue was invested in R&D of low-carbon products/services
 Linked to: CDP C4.3c 2022; CDP C4.2b 2022; (partially linked to) ISAR A.3.3
 (Text box with option for 'Unknown' or 'Not applicable')

	Percent of revenue (%) (Please input a whole number (e.g., 50% = 50))	Unknown	Not applicable (Please provide additional information) [Makes text box mandatory]
R&D for low-carbon products/services	_____	○	x

Please provide additional information: ClientEarth is a environmental law NGO so no applicable products or

E9. Has the company acted to support climate change adaptation and resilience?
 Linked to: GRI Disclosure 201-2-a-iv (2016)
 (Select all that apply)

- We have taken action to increase company-wide resilience to climate change
- We have taken action to increase resilience in our supply chains
- We have taken action to increase resilience in the communities in which we operate
- We have provided funding for climate change adaptation and resilience initiatives and projects
- We have not taken actions to build climate change resilience in the reporting period
- Unknown

Please provide additional information: _____

Energy / Resource Use

E10. Please report the company's renewable energy consumption as a percentage of total energy
 Linked to: ISAR B.5.1; GRI Disclosure 302-1 (2016)
 (Text box with option for 'Unknown')

	Percent of total energy consumption (%) (Please input a whole number (e.g., 50% = 50))	Unknown
Renewable energy consumption/ total energy consumption	_____	x

Please provide additional information: Renewable energy not always identifiable from our energy providers

Technology

E11. What percent of the company's revenue came from low-carbon products/services within the reporting period?
 Linked to: SASB CG-MR-410a.1a; WEF Common Metrics
 (Text box with option for 'Unknown' or 'Not applicable')

	Percent of total revenue (%) (Please input a whole number (e.g., 50%=50))	Unknown	Not applicable (Please provide additional information) [Makes text box mandatory]
Low-carbon products and services/total revenue for the reporting period	_____	<input type="radio"/>	<input checked="" type="radio"/>

Please provide additional information: ClientEarth is an environmental law NGO so no applicable revenue from

Additional Topic-specific Questions

E12. Which of the following has the company identified as material environmental topics connected to its business?
 Linked to: GRI Disclosure 2-6-a (2021)
 (Select all that apply)

- Water [Prompts E13, E14]
- Forests, Biodiversity, and Land use [Prompts E15, E16, E17]
- Air pollution [Prompts E18]
- Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.) [Prompts E19, E20, E21]
- None of the topics have been identified as material by the company

Please provide additional information: _____

Additional Topic-specific Questions: Water

E13. Please provide details regarding the company's water withdrawal and consumption (own operations and leased assets).
 Linked to: ISAR B.1.3; CDP W1.2b 2022, CDP W1.2d 2022; SASB CG-HP-140a.1; GRI Disclosures 303-1, 303-2, 303-3
 (Text boxes with option for 'Unknown' or 'Not applicable')

	Known (Volume of water in megaliters)	Unknown	Not applicable (Please provide additional information) [Makes text box mandatory]
Total water withdrawal: fresh surface water	_____	<input type="radio"/>	<input type="radio"/>
Groundwater withdrawal: brackish surface water/seawater withdrawal	_____	<input type="radio"/>	<input type="radio"/>
Produced water withdrawal: multi-party water withdrawal	_____	<input type="radio"/>	<input type="radio"/>
	_____	<input type="radio"/>	<input type="radio"/>

Percentage of water withdrawn in regions with high or extremely high water stress(%):	_____	<input type="radio"/>	<input type="radio"/>
Total water consumption: fresh surface water withdrawal:	1675	<input type="radio"/>	<input type="radio"/>
Groundwater withdrawal: brackish surface water/seawater withdrawal:	_____	<input type="radio"/>	<input type="radio"/>
Produced water withdrawal: multi-party water withdrawal:	_____	<input type="radio"/>	<input type="radio"/>
Percentage of water consumed in regions with high or extremely high water stress (%)	100%	<input type="radio"/>	<input type="radio"/>
	_____	<input type="radio"/>	<input type="radio"/>

Please provide additional information: _____

E14. Please provide details about the company's water intensity of products in regions with hi
 Linked to: CDP 1.3 2022; CDP 1.3a 2022
 (Text box with option for 'Unknown' or 'Not applicable')

	Cubic meter/\$ OR cubic meter/product type (Please input a number e.g., 50)	Unknown	Not applicable (Please provide additional information) [Makes text box mandatory]
Water intensity of products:	_____	<input type="radio"/>	<input checked="" type="radio"/>

Please provide additional :ClientEarth is a environmental law NGO so no applicable products o

Additional Topic-specific Questions: Forests, Biodiversity, and Land Use

E15. Please report the number and area (in hectares) of sites owned, leased, or managed by the
 Linked to: GRI Disclosure 304-1 (2016)
 (Text box with option for 'Unknown' or 'Not applicable')

	Number	Unknown	Not applicable (Please provide additional information) [Makes text box mandatory]
Sites	_____	<input type="radio"/>	<input checked="" type="radio"/>
Hectares	_____	<input type="radio"/>	<input checked="" type="radio"/>

Please provide additional :ClientEarth is a environmental law NGO so no applicable products o

E16. In hectares, please report the area of natural ecosystems converted in areas owned, lease
 Linked to: CDP F1.3 2022; GRI Disclosure 304-1 (2016)
 (Text box with option for 'Unknown' or 'Not applicable')

	Area (hectares)	Unknown	Not applicable (Please provide additional information) [Makes text box mandatory]
Conversion of natural ecosystems	_____	<input type="radio"/>	<input checked="" type="radio"/>

Please provide additional information: ClientEarth is an environmental law NGO so no applicable land or lease

E17. Is the company supporting or implementing project(s) focused on ecosystem restoration and
 Linked to: [CDP F6.11 2022](#); [GRI Disclosure 304-3 \(2016\)](#)
 (Select one answer option per line + text box)

	No	No, but we plan to within the next 2 years	Yes, project(s) area to date (hectares)
Forest ecosystem restoration	<input type="radio"/>	<input type="radio"/>	_____
Other ecosystem restoration	<input type="radio"/>	<input type="radio"/>	_____
Reforestation	<input type="radio"/>	<input type="radio"/>	_____
Natural regeneration	<input type="radio"/>	<input type="radio"/>	_____
Agroforestry	<input type="radio"/>	<input type="radio"/>	_____
Set-aside land	<input type="radio"/>	<input type="radio"/>	_____
Biodiversity offsetting	<input type="radio"/>	<input type="radio"/>	_____
Other (Please provide additional information)	<input type="radio"/>	<input type="radio"/>	_____

Please provide additional information: _____

Additional Topic-specific Questions: Air Pollution

E18. Where applicable, please report the company's emissions of the following pollutants withi
 Linked to: [GRI Disclosure 305-7 \(2016\)](#); [ISAR B.3.1](#)
 (Text box with option for 'Unknown' or 'Not applicable')

Not
applicable

Air pollutant	Emissions (t)	Unknown	(Please provide additional information) [Makes text box mandatory]
NO _x	_____	x	<input type="radio"/>
SO _x	_____	x	<input type="radio"/>
Volatile Organic Compounds (VOCs)	_____	x	<input type="radio"/>
Hazardous air pollutants (HAPs)	_____	x	<input type="radio"/>
Particulate matter (PM10)	_____	x	<input type="radio"/>
Persistent organic pollutants (POPs)	_____	x	<input type="radio"/>
Other (Please provide additional information)	_____	x	<input type="radio"/>

Please provide additional information: ClientEarth does not capture data on specific pollutants

Additional Topic-specific Questions: Waste

E19. In metric tonnes, please report the company's total weight of waste generated within the
 Linked to: GRI Disclosure 306-3 (2020); (partially linked to) ISAR B.2.1
 (Text box with option for 'Unknown' or 'Not applicable')

Waste generated (t)	Unknown	Not applicable (Please provide additional information) [Makes text box mandatory]
Solid waste	0.13	<input type="radio"/>

Please provide additional information: _____

E20. Please report the company's hazardous waste as a percentage of total waste (e.g., hazardous)
 Linked to: GRI Disclosures 306-4, 306-5 (2020); ISAR B.2.3
 (Text box with option for 'Unknown' or 'Not applicable')

Hazardous	Not applicable
	<input type="radio"/>

	Hazardous waste ratio (%) (Please input a whole number e.g., 50%=50))	Unknown	(Please provide additional information) [Makes text box mandatory]
Hazardous waste	_____	○	x

Please provide additional information: ClientEarth is an environmental law NGO and has no applicable hazar

E21. In metric tonnes, please report the company's estimated consumption of single-use plastic

Linked to: [WEF Common Metrics](#)

(Text box with option for 'Unknown' or 'Not applicable')

	Single-use plastics (t)	Unknown	Not applicable (Please provide additional information) [Makes text box mandatory]
Single-use plastics	_____	x	○

Please provide additional information: ClientEarth is an environmental law NGO and has no material levels

Overall Environment

E22. Briefly describe additional relevant, practical actions the company has taken within the

Linked to: [GRI Disclosures 3-3-c and 3-3-d \(2021\)](#) for topics [GRI 303 \(2018\)](#), [GRI 304 \(2016\)](#), [G](#)

(Text box)



c.

(2021)

Developed involving environmental expertise from inside and outside the company	Other (Please provide additional information) [Makes text box mandatory]
---	---

-
- | | |
|----------------------------------|-----------------------|
| <input type="radio"/> | <input type="radio"/> |
| <input type="radio"/> | <input type="radio"/> |
| <input type="radio"/> | <input type="radio"/> |
| <input type="radio"/> | <input type="radio"/> |
| <input type="radio"/> | <input type="radio"/> |
| <input type="radio"/> | <input type="radio"/> |
| <input checked="" type="radio"/> | <input type="radio"/> |
-

stakeholders or their legitimate representatives in relation to the following environmental topics?
GRI 305 (2016), GRI 306 (2020), GRI 302 (2016), and GRI Disclosure 201-2-a-iv (2016)

Other (Please provide additional information) [Makes text box mandatory]

-
- | |
|-----------------------|
| <input type="radio"/> |
| <input type="radio"/> |
| <input type="radio"/> |
| <input type="radio"/> |
| <input type="radio"/> |

enting/mitigating the risks/impacts associated with the following environmental topics?
6), GRI 306 (2020), GRI 302 (2016), and GRI Disclosure 201-2-iv (2016)

Other

(Please
provide
additional
information)

[Makes
text box
mandatory]

! with the following environmental topics?
6), GRI 306 (2020), GRI 302 (2016), and GRI Disclosure 201-2-a-iv (2016)

nd of targets has the company set? Please give a description of targets (e.g., what is the target, a

om business travel; 8.5% annual reduction in energy and water consumption in offices. Progress is

· where it has caused or contributed to adverse impact(s) associated with the following environmental

reporting period? If applicable, please give a description of the products/services included in your

related with its operations and/or value chain (e.g. based on the most severe actual or potential negati

reporting period and/or plans to take to implement the environment principles, including any challen



calculation (e.g., relevant certifications products/services included in your calculation (e.g., relevant



t certifications).

Anti-corruption

Commitment

AC1. Does the company have an anti-corruption compliance programme?

Linked to: [GRI Disclosure 3-3-c \(2021\) for the topic GRI 205 \(2016\)](#)
 (Radial - Select One)

- No, this is not a current priority
- No, but we plan to within the next two years
- Yes [Prompts AC1.1]

Please provide additional information: Given our operating model, this has not been a significant concern.

If respondent answers 'yes' in AC1, the below question will be displayed.

AC1.1. If yes, in what year was this programme last reviewed? (YYYY)

	(YYYY)
Programme last reviewed	_____

Please provide additional information: _____

AC2. Does the company have policies and recommendations for employee procedures in case of doubt or uncertainty?
 (Radial - Select One)

- No, and we have no plans to develop any policy/recommendation
- No, but we plan to within the next two years
- Yes, included within a broader policy or as a stand-alone policy

Please provide additional information: We have an anti-bribery, anti-fraud and anti-corruption policy, as well as

Prevention

AC3. Who receives training on anti-corruption and integrity?

Linked to: [WEF Common Metrics; GRI Disclosure 205-2 \(2016\)](#)
 (Select all that apply)

- Select employees [Prompts AC3.1]
- All employees [Prompts AC3.1]
- Contractors [Prompts AC3.1]
- Direct suppliers [Prompts AC3.1]
- Indirect suppliers [Prompts AC3.1]
- Other - such as partners, clients, etc. [Prompts AC3.1]
- No training provided

Please provide additional information: _____

If respondent answers any option in AC3 besides 'No training provided', the below question will be displayed.

AC3.1. How often is such training provided?

(Select one answer option per line)

	One time only	Every two or more years	Every year	Unknown
Select employees	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
All employees	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Contractors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Direct suppliers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Indirect suppliers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other
- such as
partners,
clients,
etc.

Please provide additional information: _____

AC4. Does the company monitor its anti-corruption compliance programme?

Linked to: GRI Disclosure 3-3-e (2021) for the topic GRI 205 (2016); SDG Action Manager - SDG 16: Peace, Justice and Strong Institutions (Select all that apply)

Yes, through review on ad hoc basis

- Yes, through internal employee self-evaluations
- Yes, through automated controls monitoring
- Yes, through external independent monitoring
- Yes, through other mechanisms (Please provide additional information) *[Makes text box mandatory]*
- No, we do not monitor the anti-corruption compliance programme (Please provide additional information)

Please provide additional information: _____

Performance

AC5. Please report the company's total number and nature of incidents of corruption within the reporting period

Linked to: GRI Disclosure 205-3 (2016); WEF Common Metrics; ISAR D.2.1

Select one answer option per line

	Number of incident(s) (Please describe the nature of the incidents in the text box below)	Unknown	Choose to not disclose
Confirmed within the reporting period, but related to previous years	0	<input type="radio"/>	<input type="radio"/>
Confirmed within the reporting period, and related to the reporting period	0	<input type="radio"/>	<input type="radio"/>

Please provide additional information: _____

Response and Reporting

AC6. Within the reporting period, what actions has the company taken to address suspected incidents?

Linked to: GRI Disclosure 3-3-d (2021) for the topic GRI 205 (2016).; Reporting Guidance on the 10: (Select all that apply)

- Initial case assessment
- Internal investigation
- Review by risk/ethics committee
- Review by board of directors
- External audit/review

Other (Please provide additional information) *[Makes text box mandatory]*

Not applicable/no incidents in the reporting period

Please provide additional information: _____

If respondent answers any option in AC6 besides 'Not applicable/no incidents in the reporting period'
AC6.1 Were these actions taken independently or in response to a dispute or investigation by a government regulator?
Linked to: GRI Disclosure 3-3-d (2021) for the topic GRI 205 (2016); Reporting Guidance on the 10th Edition (Radial - Select one)

- Minority of actions taken in response to a dispute/investigation by a government regulator
- Majority of actions taken in response to a dispute/investigation by a government regulator
- All actions taken in response to a dispute/investigation by a government regulator
- No action taken in response to a dispute/investigation by a government regulator

Please provide additional information: _____

AC7. Does the company engage in collective action against corruption?

*Linked to: GRI Disclosure 3-3-d (2021) for the topic GRI 205 (2016)
(Radial - Select One)*

No, this is not a current priority

- No, but we plan to in the next two years
- Yes (Please provide additional information) *[Makes text box mandatory]*

Please provide additional information: _____

AC8. Briefly describe additional relevant, practical actions the company has taken within the reporting period.

*Linked to: GRI Disclosures 3-3-c and 3-3-d (2021) for the topic GRI 205 (2016)
(Text box)*



and/or in situations that may represent a conflict of interest, e.g. with regard to gifts and hospitality,

as a conflicts of interest policy. We require hospitality declarations and potential conflicts of inter

rting period and/or plans to take to implement the anti-corruption principle, including any challenges fa



donations, sponsorship, or interactions with public officials?

