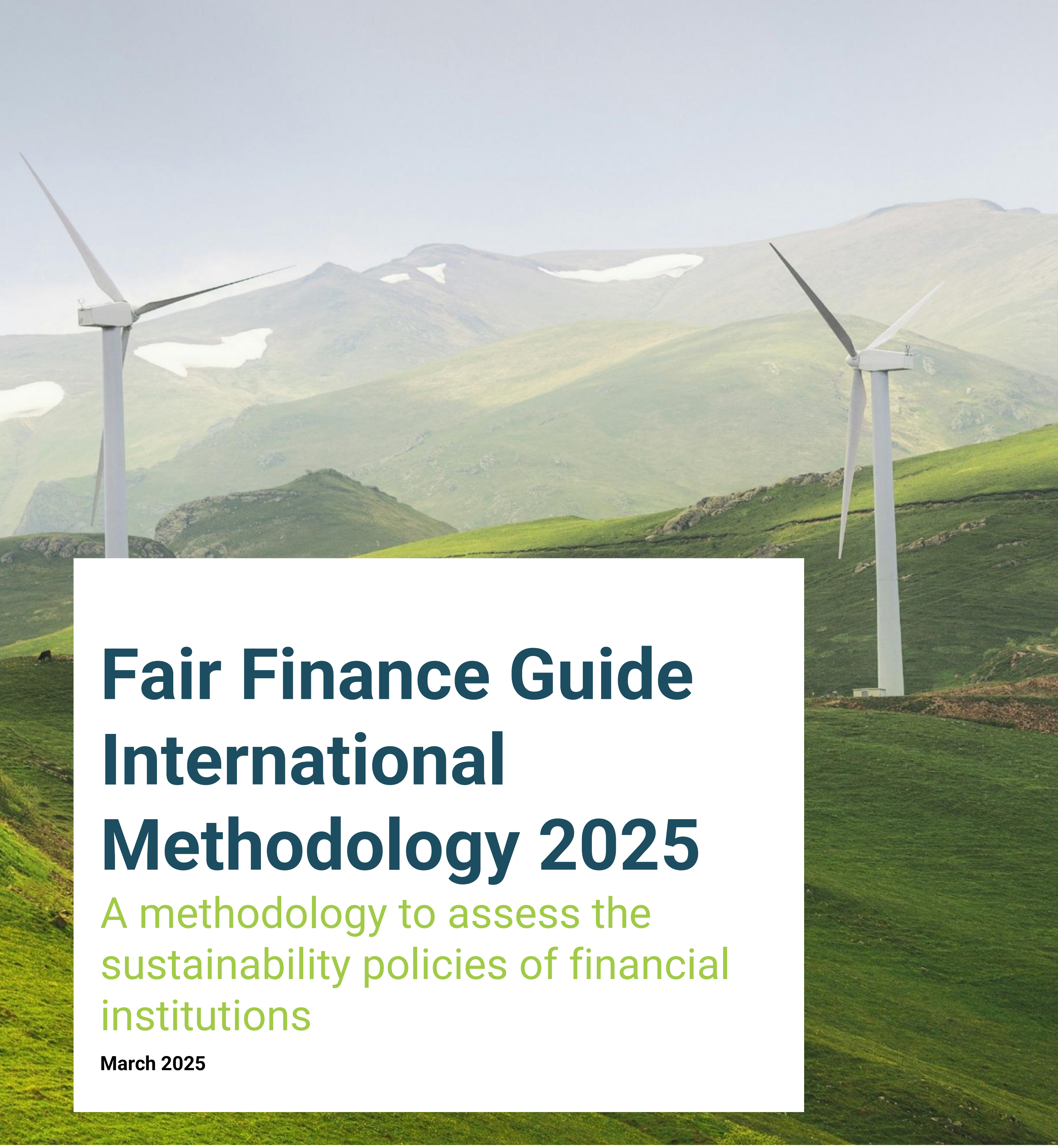


Fair Finance Guide International Methodology 2025

A methodology to assess the sustainability policies of financial institutions

March 2025

Fair Finance International

Profundo Research & advice

About this report

Oxfam Novib has commissioned this report on behalf of the Fair Finance International network of civil society organisations. It presents a methodology that is used to assess and rank financial institutions' finance and investment policies regarding their principles on sustainable development and responsible business conduct. The methodology is developed by Profundo together with the civil society organisations collaborating in Fair Finance International and is based on international standards and initiatives.

About Profundo

With profound research and advice, Profundo aims to make a practical contribution to a sustainable world and social justice. Quality comes first, aiming at the needs of our clients. Thematically we focus on commodity chains, the financial sector, and corporate social responsibility. More information on Profundo can be found at www.profundo.nl.

Authorship

This report was written by Juliette Laplane, Chithira Rajeevan and Jan Willem van Gelder, based on earlier versions of the methodology. Correct citation of this document: Laplane, J., C. Rajeevan and J.W. van Gelder (2025, February), *Fair Finance Guide International Methodology 2025*, Amsterdam, The Netherlands: Profundo.

Front page cover photograph by Getty Images - Unsplash.

Acknowledgements

The authors would like to thank the coordinators of, and the coalitions in, the Fair Finance International network for the valuable feedback on earlier versions of this report.

The work of Fair Finance International is financially supported by SIDA.

Disclaimer

Profundo observes the greatest possible care in collecting information and drafting publications but cannot guarantee that this report is complete. Profundo assumes no responsibility for errors in the sources used nor for changes after the publication date. The report is provided for informational purposes and is not to be read as providing endorsements, representations, or warranties of any kind whatsoever. Profundo will not accept any liability for damage arising from the use of this publication.

Contents

List of figures

List of tables

Introduction

There is a growing consensus on the importance of integrating environmental, social, and governance (ESG) considerations into financing and investment decisions. This integration is critical for fostering responsible and sustainable financial practices that address urgent global challenges such as climate change, social inequality, and ethical governance. By doing so, financial institutions can play a transformative role in creating a more equitable and sustainable future while ensuring their operations contribute positively to society and the environment.

A strong and accountable financial sector is essential for efficiently allocating investment funds, managing risks, and providing accessible financial services for all. However, to truly drive meaningful change, it is crucial to prevent greenwashing and ensure that products and services labeled as "sustainable" deliver genuine environmental and social benefits. In this regard, standard-setting organizations, regulators, and civil society organizations (CSOs) play a pivotal role in safeguarding the integrity of sustainable finance.

An important civil society initiative contributing to this effort is the Fair Finance International (FFI) network. The FFI network, active since 2014, is a collaborative effort of coalitions from civil society organisations (CSOs) in Bangladesh, Belgium, Bolivia, Brazil, Cambodia, Colombia, Ghana, Germany, India, Indonesia, Japan, Laos, the Netherlands, Nigeria, Norway, Pakistan, Peru, the Philippines, Southern Africa, Sweden, Thailand, Uganda and Vietnam. Most of the coalitions have set up websites which help customers and other interested parties to compare the finance and investment policies of their financial institutions on a range of cross-cutting issues and industries. Additionally, the coalitions regularly publish case studies on specific topics, assessing if and how the financial institutions apply sustainability criteria in their daily practices. Furthermore, they pressure the assessed banks, insurers, and other financial institutions to improve their policies and practices, and influence regulators to develop and impose adequate regulation.

With this project, Fair Finance International hopes to stimulate financial institutions to rethink their role in society. Developing clear and ambitious policies on environmental, social and governance issues, is a necessary first step in that direction.

This document presents the Fair Finance Guide Methodology for assessing and ranking financial institutions' policies. This is the 8th update since the first international methodology was developed in 2014. Through the collective expertise and experience of all involved in the Fair Finance International network, we trust this methodology is based on the most current insights and international standards when it comes to environmental, sustainability and human rights issues.

We are convinced this document will help the present and future CSO coalitions collaborating in Fair Finance International as well as the financial institutions across the world, to embark upon this road towards a fair and sustainable financial sector.

We thank all the researchers and experts in the coalitions within the Fair Finance International network as well as the staff at Profundo for their tireless work and contribution to developing this methodology.

Jan Willem van Gelder	Kees Kodde	Bram Joanknecht
director Profundo	project lead Fair Finance international	research and advocacy coordinator Fair Finance International

1

Objective and methodology

1.1 Overview

This methodology is meant to verify which sustainability issues play a role in the policies that financial institutions apply when assessing credit requests and selecting investments. It sets out the elements against which the civil society organisations (CSOs) collaborating in Fair Finance International will assess financial institutions' environmental, social and governance criteria in its finance and investment policies. These elements are grouped in three categories:

- cross-cutting themes (see chapter 2);
- operational themes (see chapter 3); and
- sector themes (see chapter 4).

Chapter 1 gives an overview of the Fair Finance Guide methodology. Section 1.2 describes the principles of Corporate Social Responsibility (CSR) and explains the role financial institutions have in promoting CSR amongst companies they invest in or finance. Furthermore, it explains how the Fair Finance Guide methodology seeks to stimulate a race to the top by comparing financial institutions' levels of social and environmental responsibility.

In section 1.3 five types of financial institutions are listed. The roles and activities of commercial banks, investment banks, insurance companies, pension funds, asset managers and Development Finance Institutions are explained.

The assessment of investment and finance policies is explained in section 1.4. It describes what issues and sectors are considered and how certain principles should be applied by a financial institution to be granted a score. The section elaborates on the scope of investment policies, the sectors that are relevant to specific financial institutions, the documents that should be assessed and the collective policies that could be taken into account.

The chapter is concluded by section 1.4 on the use of case studies to supplement the policy assessments based on the Fair Finance Guide methodology.

1.2 Objective and principles

This methodology has been developed for the Fair Finance International (FFI) network, which is a collaborative effort of CSO coalitions in Bangladesh, Belgium, Bolivia, Brazil, Cambodia, Colombia, Germany, Ghana. India, Indonesia, Japan, Laos, the Netherlands, Nigeria, Norway, Pakistan, the Philippines, Southern Africa, Sweden, Thailand, Uganda and Vietnam.

The objective of Fair Finance International is to encourage corporate social responsibility (CSR) by financial institutions. According to ISO 26000:2010 Guidance on social responsibility, CSR can be defined as the "responsibility of an organisation for the impacts of its decisions and activities on society and the environment, through transparent and ethical behaviour that contributes to sustainable development, including health and the welfare of society; takes into account the expectations of stakeholders; is in compliance with applicable law and consistent with international norms of behaviour; and is integrated throughout the organisation and practised in its relationships".[1] The OECD Guidelines for Multinational Enterprises state that corporations should “contribute to economic, environmental and social progress with a view to achieving sustainable development”.[2]

This means companies (including financial institutions) should not only adhere to legislation and regulations in the countries where they operate, but also are expected to comply with widely supported international conventions, standards, and initiatives that recognise sustainability problems and offer solutions for them - even where these standards are not included in local legislation. Companies should comply with these standards in the business operations of their own enterprise and its subsidiaries, but they should also expect their suppliers to comply. (See the EU 2014 Compendium of Corporate Social Responsibility National Public Policies for a comprehensive overview of CSR standards).[3]

According to the OECD due diligence guidelines for the financial sector, financial institutions' Responsible Business Conduct (RBC) efforts should primarily concern their core activity: providing capital.[4] Financial institutions offer their clients a wide range of financial services with which they enable companies, governments, and private clients to acquire capital for all kinds of activities. This can encompass activities that lead to human rights violations or environmental pollution, as well as activities that contribute to ending malnutrition or improving biodiversity.

The question FFI raises is, therefore, to what extent financial institutions support, through their financial services, activities that contribute to a socially just and sustainable world. According to FFI, financial institutions should expect companies to whom they provide capital, as well as their suppliers, to comply with widely supported international standards and initiatives.

Financial institutions should record these expectations and make them publicly known in their policies for specific issues and sectors. When assessing these policies, in most cases, legislation and regulations are not explicitly considered, because FFI assumes that financial institutions expect the companies to whom they provide capital to comply with the law. Due to this focus on financial services, issues related to financial institutions' own business operations, such as their human resources policies and paper, water, and energy use, are largely left out of the equation.

In the framework of Fair Finance International, coalitions of civil society organisations (CSOs) have been set up in various countries and regions - at present Belgium, Bolivia, Brazil, Colombia, Germany, the Netherlands, Nigeria, Norway, Pakistan, Peru, Southern Africa and Sweden. In addition, Fair Finance Asia (FFA), which is part of Fair Finance International, works with Asian civil society organisations coalitions in Bangladesh, Cambodia, Indonesia, Japan, Laos, Pakistan, the Philippines, Thailand, and Vietnam. Most of these coalitions have developed their own websites, to help customers and other interested parties to compare the policies and practices of the main banking groups in their country or region. The Fair Finance International network primarily focuses - through these websites, publications, and the media - on consumers who are customers of one of the financial institutions (by means of a current account or checking account, savings account, credit card, mortgage loan, insurance, or an investment account), and on policymakers and regulators.

The Fair Finance International network enables consumers, the media, and other interested parties to compare financial institutions and to encourage them (and their subsidiaries in asset management and insurance) to grant financial services in a responsible way.

By comparing financial institutions both on the contents of their policy as well as on the choices they make in practice when supplying financial services, the CSOs collaborating in Fair Finance International stimulate competition and cooperation between financial institutions regarding Corporate Social Responsibility. The Fair Finance International network hopes to stimulate a process that leads to increasing tightening of social, environmental, and economic policies (*race to the top*), to enhance the constructive role financial institutions can play in creating a just and sustainable world and to encourage financial regulators and supervisors to play a critical role in driving banks to adopt sustainable practices swiftly.

1.3 Financial sector

The financial sector is made up of several different types of financial institutions. This section elaborates on the different types of financial institutions that can be assessed using the Fair Finance Guide International Methodology (FFGI Methodology).

1.3.1 Commercial banks

Commercial banks attract monies from individuals, organisations, institutions, and companies in the form of savings or deposits, and invest these monies by providing loans and other financial products to other individuals, organisations, institutions, and companies. This can take the form of retail banking (focused on private individuals) or corporate banking (focused on banking services for businesses and other larger institutions). Banks set out these amounts in their *balance sheets* in two columns: on the right, how the bank has obtained the monies (the *liabilities*), and on the left, how the bank has spent the monies (the *assets*). Below we describe both categories:

- **Liabilities**

  The *liabilities* of the bank – all its incoming capital - can be divided into *debts* and own *capital*. The *own capital* represents the monies of the owners of the bank. These can be its shareholders, other financial institutions or - in case of a *cooperative bank*, its members, who may be its customers, employees, or other local banks. Their capital consists of:

  - money raised by selling shares in the bank; and
  - the net profit the bank has made in past years.

  The *debts* of the bank include all other monies it attracts, including:

  - monies that private clients, institutions and companies have deposited in current (checking) and savings accounts;
  - loans from other banks;
  - bonds that the bank has sold to investors; and
  - financial derivatives: debts due to swaps[i], futures[ii], or options.

- **Assets**

  All incoming monies at a bank are invested in various types of *assets*. In other words: the sum of the liabilities is always exactly equal to the sum of the assets. Banks may have invested in the following types of assets:

  - the offices and furnishings of the bank itself;
  - other real estate, such as offices, parking lots and shopping centres;
  - mortgage loans and credit to private clients;
  - loans and other types of credit to companies, governments and investors such as hedge funds;
  - loans to other banks;
  - investments in shares and bonds of companies and in bonds of governments, but also in private equity; and
  - investments in financial derivatives: swaps, futures, and options.

---

i A swap is a derived financial product where two parties swap money flows. For example, at an interest swap two banks may swap the interest payments of two loans with one another. The objective of this can be to mitigate the risk of, for example, an interest increase or even to speculate on an interest decrease. So in case of a swap, banks have both a debt as well as an asset.

ii A future is a financial contract between two parties who commit themselves to trade a certain amount of a product or financial instrument for a predetermined price at a given point in time.

Not all banks hold all these types of assets. Savings banks mainly invest in shares and bonds, mortgage bank assets consist mainly of mortgage loans and commercial banks mainly engage in loans to companies and governments. Over the last decades, some commercial banks have started to invest more in financial derivatives.

All monies that have been placed with a bank in current (checking) and savings accounts by private clients, institutions, and companies, may in principle be used by the bank for all possible bank investments: from mortgage loans to private clients to investments in international companies and financial derivatives. This means that a customer that has placed money in a current or savings account at a bank will not necessarily know what his or her money is used for. Banks are free to invest the monies of savers at their own discretion. Therefore, it is of great importance that banks provide insight into what policy is maintained for its investments.

1.3.2 Investment banks

Investment banks act as intermediaries between different groups of clients, including companies, governments, wealthy individuals, and institutional investors. Investment banking services are mostly provided to listed companies and governments, but they can also be granted to non-listed companies. These clients pay a fee to investment banks for their financial services.

Broadly, two main activities can be distinguished:

- **Underwriting**: Investment banks are mainly involved in assisting companies or governments to raise finance by issuing and selling *securities* such as shares and bonds to investors. For companies and governments, selling securities to pension funds, insurance companies, asset management companies and private investors is an important way to attract new capital. The investment bank will value the company, write a prospectus, promote the securities, and "underwrite" the securities.

  Underwriting means that the investment bank buys the securities from the company for a fixed price and in the days after that, tries to sell the securities to institutional investors for a slightly higher price. In this way, the revenue for the company is guaranteed. The investment banks aim to ensure that there are sufficient buyers for the securities and that their clients, the companies and governments raising the finance, receive the best possible revenue. On a predetermined date the investment bank purchases the shares and bonds of its client at a fixed price, and sells them to the investors who can sign within a few days.
- **Brokerage** (sometimes called *corporate finance*): brokerage means that the investment bank doesn't purchase anything itself, but only acts as a broker who mediates between the buyer and the seller.

For most banks that are involved in investment banking, it is a matter of course that they apply the policy for bank investments to these financial services (see section 1.3.1). In the case of *underwriting* this is logical because the banks themselves invest in the respective shares and bonds - although usually only for a few days. The risks the banks take are therefore comparable to those of other bank investments.

In case of banks that are only involved in *brokerage*, the bank does not make an investment, and it is therefore not always the case that the policy for bank investments also applies to brokerage accounts. However, the Fair Finance International network believes that for these types of financial services, the same sustainability criteria should apply as for commercial banking, because in this role banks also provide capital to companies and governments.

1.3.3 Insurance companies

An insurance company hedges risks. An insurance is a contract which ensures that the insurance company pays damages to the insurant in certain situations (such as damages caused by fire or by an accident, in the event of death, or for medical costs due to disease) in exchange for a certain premium paid by the insurance customer.

When the parties conclude the contract, they don't know whether damages will ever have to be paid or, if so, how much damages will be paid. The insurance companies invest the premiums that people pay for their insurance. Therefore, insurers are key players on the capital market: they create a flow of society's capital from private people and institutions such as pension funds, towards (other) private people, companies and governments who need money in order to finance their activities.

Hence, insurance companies play two key roles. They are providers of insurance products and services on the one hand, and investors on the other. The FFGI Methodology currently only focuses on insurance companies' investment activities.

On the insurers' balance sheet the flows of capital are put next to each other: on the right is shown how the insurer obtained its money (the *liabilities*), on the left is shown how the insurer used that money (the *assets*). An explanation of these two categories follows:

- **Liabilities**

  An insurer's *liabilities* – i.e. all the money the insurer has received – may be divided into obligations and equity. The equity is the money of the insurer's owners. They may be private people, other financial institutions or – in the case of a cooperative insurance company – the insurance customers themselves. The equities consist of:

  - money that has been obtained by selling the insurance company's shares to the owners;
  - the net profit made by the insurer over the years.

  All other money obtained by the insurer falls within the insurer's obligations. Especially:

  - premiums paid by private people, institutions and companies;
  - loans of other financial institutions;
  - bonds sold by the insurer to investors;
  - financial derivatives: debts due to swaps[i], futures[ii] or options.

- **Assets**

  All the money received by an insurer is invested in several kinds of assets (properties and claims). In other words: the liabilities are always equal to the assets. An insurer may invest in the following types of assets:

  - the offices, including furniture, where the insurance company staff works;
  - other real estate like office buildings, multi-story car parks and shopping malls;
  - mortgage loans and consumer credits to private people;
  - loans to other financial institutions; and
  - investments in government bonds and in companies' securities (equity, bonds, derivatives).

Not every single insurance company invests in all these kinds of assets. Moreover, insurers deal with investments on their own account and risks and investments on the policyholder's account. Regarding the latter kinds of insurances, the insurant bears the risk more or less. Insurance customers may decide for some part how their money is invested, usually according to a certain

i A swap is a derivative in which two parties swap cash flows. E.g. in the case of an interest swap, two insurers swap the interest payments of two loans. The aim may be a limitation of the risks of, say, an increase of the interest rate or perhaps to speculate upon a decrease of the interest rate. Thus when engaging in a swap transaction the insurer both has a debt as well as property.

ii A future is a financial contract between two parties to buy or sell at specified future date a certain quantity of a product or a financial instrument for a price agreed upon today.

kind of investments profile that brings along either more or less risks. However, in the end, the insurer is responsible for the choices made about the investments.

Basically, the insurance company can freely use the premiums paid by private people, institutions, and companies, for all kinds of possible investments: varying from mortgage loans to private people, to investments in international companies and financial derivatives. This means that someone who pays insurance premiums, may not know what exactly his or her money is invested in. The insurers are free to invest the customers' money on their own discretion - including the premiums on their own account. For this reason, it is very important that insurers are transparent about their policy regarding investments.

1.3.4 Pension funds

Pension funds are established by governments or employers to provide pensions to retired workers. The fund usually is funded by premiums paid by employers and employees, but other sources of funding are possible as well. This creates a common asset pool meant to generate a stable income over the long term. Larger employers (companies and government departments) may set up their own pension funds, while smaller companies can join (or are obliged to join) a sectoral pension fund. Pension funds are often managed jointly by (the) employer(s) and trade unions.[5]

In many countries, pension funds are the largest institutional investors. The premiums they receive from employers and from employees, also called participants, are invested in diverse assets and investment strategies. The actual investment process is usually outsourced to an asset manager, which can be owned by the pension fund itself or can be an external party.

On the pension fund's balance sheet the investment flows are put next to each other: on the right you see how the fund obtained its money (the liabilities), on the left you see how the pension fund spent the money (the assets). These two categories can be further explained as follows:

- **Liabilities**

  A pension fund's liabilities – i.e. all the money the pension fund has received – may be divided into provisions and financial derivatives. Together they amount to the pay-outs that a pension is obligated to make in the future.

- **Assets**

  The money received by pension funds is invested in in different types of assets:

  - public listed equities, consisting of publicly traded stocks of large corporations;
  - corporate bonds that are issued by a corporation to raise money to expand its business;
  - government bonds that are issued by a national government to fund public services, goods or infrastructure;
  - private equity, consisting of investments in unlisted companies, ranging from venture capital investments in start-ups, to mezzanine financing for established companies aiming for a trade sale or public listing, to buy-outs of public companies;[6]
  - commodities, which are natural resources or derivatives of natural resources, like food, energy and metals;
  - hedge funds, which are aggressively managed portfolios of investments that use advanced investment strategies such as leveraged, long, short, and derivative positions in both domestic and international markets with the goal of generating high returns;[7]
  - real estate, consisting of a wide range of products including home ownership for individuals, direct investments in rental properties and office and commercial space for institutional investors, publicly traded equities of real estate investment trusts, and fixed-income securities based on home-loans or other mortgages.

In most countries, bonds and equities are the two main asset classes in which retirement savings were invested. According to the Thinking Ahead Institutes, in 2022, the average portfolio for the top 20 pension funds worldwide showed that the highest proportion of their assets were invested in equities (49.0%), followed by fixed income securities (28.2%)[8].

There is a growing recognition among pension funds and an increasing demand from stakeholders that Environmental, Social and Governance (ESG) issues are a fundamental part of assessing the value and performance of investments. The pension fund has a fiduciary duty that involves creating optimal value for the participant of the fund. Value in this case includes both financial return and ESG considerations.[9]

While in some countries the pension market is dominated by pension funds as described above, in other countries the assets of the pension schemes set up by employers are managed by large independent asset managers or asset management subsidiaries of banks and insurance companies.

ESG factors are an important dimension of investment expectations and ESG factors should be part of a pension fund's overall expectations for their fund's performance. Furthermore, pension funds should make sure that the asset managers they hire act in line with the pension funds' risk management procedures as well as with participants' expectations. As a vast majority of pension funds have outsourced management tasks to external providers, the pension fund should communicate a coherent set of ESG expectations to agents acting on their behalf to create a shared vision of ESG risks and possibilities.[10] Pension funds as 'universal owners' are investors in a broad cross-section of the economy and they should use their position as capital providers to deny notorious polluters and human rights offenders access to capital, stimulate the large majority of companies to invest in sustainable development and production methods and grant smaller, truly innovative companies easier access to capital.[11]

1.3.5 Asset managers

Often, large financial institutions do not only provide capital to companies and governments by means of corporate loans or investments and investment banking. They may also have one or more subsidiaries which are involved in asset management. These asset management subsidiaries invest in shares, companies, and government bonds along with other types of investments. They do so with monies from private investors, pension funds, policy holders and other clients. For these asset management activities, financial institutions don't always apply the same policy that they apply for their lending and investment banking.

This is to some extent due to the differences between saving and investing. Savers cannot choose where their money is invested, but on the other hand they enjoy the security of a relatively fixed savings interest rate and, in many countries, a government guarantee on savings deposits.

However, investors are generally more at risk, although their returns may be higher. Moreover, investors are free to make choices as to how their money is invested. For example, they can choose from the range of investment funds the financial institution offers them (often including funds marketed as 'sustainable'). Therefore, some financial institutions do not see the need to apply a 'responsible investment policy' to all asset management activities: it is reasoned that the investing clients who consider this important will opt for the sustainable funds the financial institution offers.

The Fair Finance International network primarily focuses on raising awareness of customers with a current or savings account at a bank. For them, the main concern is which policy the bank applies for its lending and other financial services. The policy that the subsidiaries of the bank apply for asset management is not directly relevant for these savers, because the money of savers is not managed by these asset management subsidiaries. Yet, many savers do consider the policy of the financial institution for asset management to be important. As clients, they expect that their bank operates responsibly in all these aspects, including in its asset management, regardless of whether this concerns investments with their own savings.

For customers of a financial institution's asset management division (i.e. investors), insurance customers or customers who commission the financial institution to invest for them *(*i.e. *private banking* customers*)*, an assessment of the policy for asset management is also important.

The Fair Finance International network believes that financial institutions may also be expected to act in a responsible way regarding their activities in the field of asset management, and therefore, the policy of the financial institutions towards asset management is also assessed. In making the decision to include an assessment of the policy for asset management, it was of great importance for the Fair Finance International network that most financial institutions can play a role in creating a just and sustainable world through their asset management activities. As asset managers, they can choose which investments to offer to their clients. Such choices may have consequences for the availability of capital for companies and governments.

1.3.6 Development Finance Institutions

National and international Development Finance Institutions (DFIs) are specialised development banks or subsidiaries set up to support public or private sector development in developing countries. They are usually majority-owned by national governments and source their capital from national or international development funds or benefit from government guarantees. This ensures their creditworthiness, which enables them to raise large amounts of money on international capital markets and provide financing on very competitive terms.[12]

Since they are publicly owned and consequently financially backed by governments. they are able to provide loans, grants, investment capital, or financial guarantees to projects considered too financially risky for private financial institutions (such as commercial banks).

DFIs were among the first financial institutions to develop environmental, social and governance policies for their financing activities. DFIs often finance projects in sectors associated with (actual or potential) high environmental, social and human rights risks, such as infrastructure, energy, agriculture, and industry. This means that DFIs should have adequate policies and safeguards in place to ensure that their financing activities do not harm core sustainability and human rights principles, and in turn undermine their mandate for economic development.

DFIs are distinct from other financial institutions in that they do not have individual banking customers or clients. Nevertheless, because a lot of them provide financing to the private sector with an explicit mandate to contribute to socio-economic development, the FFI network believes that the criteria set out in the FFGI Methodology apply to DFIs just as well as to other, commercial financial institutions. As an example, see the Policy Assessments by Fair Finance Southern Africa.[13]

1.4 Assessment methodology

1.4.1 Sustainability themes

The Fair Finance Guide International Methodology makes it possible to assess the policies of financial institutions on a total of 19 sustainability themes. These are divided in:

- **Cross-cutting themes**: the main international sustainability issues that are paramount to the work of the organisations collaborating in the Fair Finance International network and are relevant to all or most of the industrial sectors a financial institution may finance or invest in;
- **Sector themes**: addressing specific sustainability issues relevant for sensitive industrial sectors where sustainability problems are particularly likely; and
- **Operational themes**: relevant sustainability topics which are not related to the companies in which a financial institution finances or invests, but are related to services to consumers and

the internal operations of the financial institution.

Table 1 provides an overview of the different sustainability themes covered by the FFGI Methodology.

Table 1 Sustainability themes included in the FFGI Methodology

Cross-cutting themes	Sector themes	Operational themes
Animal welfare	Arms	Consumer protection
Biodiversity	Food	Financial inclusion
Climate change	Forestry	Remuneration
Corruption	Mining	Transparency and accountability
Gender equality	Oil and gas	
Health	Power generation	
Human rights		
Labour rights		
Tax		

The CSO coalitions collaborating in the Fair Finance International network have agreed that eight themes included in Table 1are the core themes relevant when assessing the policies of financial institutions:

- Climate change;
- Corruption;
- Gender equality;
- Human rights;
- Labour rights;
- Biodiversity;
- Tax; and
- Transparency and Accountability.

The different Fair Finance coalitions often assess one or more of the other themes listed in Table 1 as well, depending on the relevance for their specific context, the public debate and the priorities and objectives of the organisations within their coalition.

Not all themes may apply to all types of financial institutions (as discussed in section 1.3). For instance, the operational themes of consumer protection and Financial inclusion are relevant only for financial institutions providing personal banking or insurance services, not for pension funds or asset managers.

By comparing financial institutions both on the contents of their policy as well as on the choices they make in practice when supplying financial services, the CSOs collaborating in Fair Finance International stimulate competition and cooperation between financial institutions regarding ESG. The Fair Finance International network hopes to stimulate a process that leads to increasing tightening of social, environmental, and governance policies (*race to the top*), to enhance the constructive role financial institutions can play in creating a just and sustainable world and to encourage financial regulators and supervisors to play a critical role in driving banks and investors to adopt sustainable practices swiftly.

Cross-cutting themes are presented in chapter 2, operational themes in chapter 3 and sector themes in chapter 4.

In this methodology document, each theme is dealt with in a separate section within each chapter. Each section begins with an overview of “assessment elements” a financial institution should include in its policy for investments and financial services (see section 0 for further clarification). This is followed by a section titled *"What is at stake?"* corresponding to a description of the sustainability issues involved. Next, an overview of applicable and widely supported international standards, such as declarations, conventions, guidelines, certification schemes, and codes of conduct (*"International standards and initiatives"*).

1.4.2 Assessment elements

For each sustainability theme listed in Table 1, this methodology has defined a number of "assessment elements" derived from national and international norms, standards and initiatives for sustainable development and ESG, and from emerging good practices that are considered important in the opinion of the organisations that make up the Fair Finance International network. These assessment elements define the expectations of the FFI network towards financial institutions in the context of their ESG policies.

This methodology references a wide range of international standards and initiatives. In many cases, they contain specific requirements of financial institutions or business in general, in which financial institutions invests or finance, which are then listed as assessment element in this document. Other international standards have clear implications for the financial sector or for businesses they invest in or finance, but the standard itself does not specify these at the level needed for the aim of this research. In these cases, the FFI network has analysed the logical implications of the standard and converted these implications into assessment elements.

In defining the assessment elements, the following considerations have been used:

- **Assessment elements formulated as principles**

  The assessment elements are formulated as *principles*. Principles can be applied by the financial institutions for new and existing investments and financial services. For example, the principles can be included by the financial institutions in the conditions for new loans and be applied as selection criteria for new investments and financial services. For existing loans and investments, they can be applied as a guideline for engagement activities and for agreements on improvements with the companies in which the financial institution has existing investments. Based on these principles, financial institutions could ultimately decide to terminate an investment relation.

  The Fair Finance Guide Methodology does not evaluate the processes which financial institutions should follow to apply the principles to their investments and financial services, but does expect that they explain their method of working in their policies. The financial institution would *inter alia* have to indicate what the principles mean for various types of investments and financial services. If the financial institution only establishes a certain condition for a specific type of investment or for certain financial services, it is difficult to claim that the financial institution applies a principle. The Fair Finance Guide Methodology assumes that principles need to have a meaningful link to the activities or products of a company for all types of investments in companies and all financial services to companies.

- **Assessment elements for financed companies and for the financial institution itself**

  In its assessment of the policies of financial institutions, the Fair Finance Guide Methodology does not principally address the way the financial institution takes decisions on its investments and financial services. Rather, the focus is on the underlying *principles* or *expectations* of the financial institution with regard to the companies it finances or invests in. In the tables with assessment elements for each cross-cutting theme (chapter 2) and each sector theme (chapter 4), these principles or expectations are introduced as "the following elements are crucial for a policy regarding the companies a financial institution invests in."

The Fair Finance Guide Methodology does, however, also include four *operational* themes (chapter 3). The assessment elements included in these themes largely concern the business operations of the financial institution, including the way decisions on investments and financial services are taken and also issues related to consumer protection and financial inclusion.

A few elements that concern operational activities of the financial institution have been included in the cross-cutting and sector themes as well. These assessment elements are introduced separately as elements that are crucial for a policy regarding the financial institution's internal operations.

1.4.3 Scope of policies

To assess the investment and finance policies of financial institutions, not only the content but also the scope of the financial institution's policy documents is of importance. Policy documents sometimes cover only a small share of all investments and financings made by the financial institution. This can especially be the case with large international banking groups, which often have multiple subsidiaries in different countries which offer different products and services to various client groups. As the Fair Finance Guide International Methodology aims to assess the policies which are applied across the entire banking group, including all subsidiaries, the scope of policy documents is integrated in the assessment methodology.

Experience with the assessment of investment and credit policies has shown that there are generally four situations in which a financial institution's policies might insufficiently cover the full scope of all investments made, and financial services offered, by the financial institution:

- The policy is not adopted by all subsidiaries within the financial institution;
- The policy is not applied to all categories of investments and financial services;
- The policy is applicable to a relevant scope category but with a strong loophole (for instance a very high threshold making the policy weak, or important exceptions)
- The policy is not applied to all countries the financial institution invests in; and
- The policy is not applied to all activities of a company (e.g. only if the investment is earmarked for certain activities).

The last two situations are found less often and are not always mentioned in the policies themselves. As these are difficult to trace back to policies and in order to simplify the scoring model, the FFGI Methodology does not take these situations into account further. In case the policies include strong limitations related to geography or the scope of the activity, a full score is not granted.

For a more accurate analysis of the scope of application of policies, the FFGI Methodology has selected four "investment categories" that are considered relevant for most financial institutions assessed by the Fair Finance coalitions. This selection is based on the description of the various types of financial institutions in section 1.3 and on research done on the scope of the investment and credit policies of financial institutions. To assess the scope of the policies of a financial institution, the Fair Finance Guide methodology considers the following "investment categories":

- **Corporate credits**

  Financial institutions provide loans and other forms of credits to companies, which allow the companies to finance short-term expenses and/or long-term investments. Corporate credits usually carry an interest rate and are secured by specific assets (as in the case of mortgage loans) or by the entire balance sheet of the company.

  Further, financial institutions also underwrite shares and bond issuances for companies. This service to companies is also included in the corporate credits category by the Fair Finance Guide methodology.

Obviously, the scope of corporate credits does not include loans and credits to private customers.

- **Project finance**

  Financial institutions also provide loans in the form of project finance. Project finance is a specific form of corporate credits typically used to finance large-scale infrastructure or industrial projects. A project finance loan is secured by the projected cash flows of the project rather than by the balance sheet(s) of the company/companies involved in the project. Projects involving asset-based financing, such as financing of ships or tankers, also fall under this category. The project involves a joint venture or special purpose vehicle (SPV), which shields the project sponsors from financial liability when the project fails. Banks providing project finance therefore have limited or no recourse when the project sponsors default on the loan. For this reason, project finance is relatively high-risk and banks are often much more directly involved in the decision making process of the project.

- **Proprietary assets**

  Financial institutions invest their money in shares and (sovereign and corporate) bonds and other types of securities. This investment can be done by purchasing individual stocks and bonds or through mutual funds. Since these investments require specialization, it is mostly done through an asset manager. This can be the financial institution's asset management subsidiary or an external asset management company, and is often referred to as externally managed assets or assets managed by third party. Whether the assets are managed internally or by a third party, these investments are listed on the financial institutions' balance sheet and therefore called proprietary assets.

- **Asset management**

  Financial institutions also offer investment solutions such as mutual funds or index trackers to their clients. These clients could be institutional investors like pension funds, churches, insurance companies, but also private customers (in which case the asset managers offering the solutions are often referred to as private banking, retail services or wealth management). In the terminology of the FFGI Methodology, asset management includes the management of client investments in all types of securities by a financial services company, such as by an investment bank, a private bank, an investment manager, or an asset manager.

  Sometimes, clients may demand highly specialised investment products, deviating from standard investments by asset class, geographical coverage, sector coverage or financial vehicle that a financial institution may not offer. In such a scenario, the financial institution outsources the agreed amount of its client's assets to an external asset manager and this is referred to as externally managed assets. Third-party asset managers can provide asset class expertise that may not otherwise be available with in-house investment managers or financial institutions. Again, either managed externally or internally, this is still called asset management.

  These investments are usually not listed on the balance sheet of the financial institution. This category includes all funds and mandates which are managed actively or passively for clients, as well as all forms of investment advice offered to clients. The definition of asset management used here does not apply to trading platforms managed by financial institutions, where financial institutions do not provide investment services.

For each financial institution, the Fair Finance researcher determines which of the investment categories are relevant, as (one or more subsidiaries of) the financial institution is actively making this type of investments or is offering these financial services. How this assessment of relevant categories is made, is explained further in section 1.4.5.

1.4.4 Scoring system

For every theme, the score of each financial institution is based on the proportion of elements included in the policy, corrected for the relevant investment categories that the policy is applied to. In its scoring system, the Fair Finance Guide Methodology therefore takes into account both the content and the scope of the policies of the financial institution.

This is done in the following way. The contents of policies are analysed by assessing whether they are in line with the scoring criteria of each assessment element. For each assessment element that is fully reflected in the policy, a *basic score* of 1 is awarded. If no sufficient policies are found, a score of 0 is awarded.

If the policy of a financial institution meets all the criteria of an assessment element, the basic score can be multiplied with a *scope score*, expressed as a percentage based on the coverage of the four investment categories discussed in section 1.4.3.

If the financial institution does not clarify the scope of its policy, it is assumed that 50% of the financial institution's activities are covered. For this reason, the default scope score is 50%. This percentage is increased for each investment category to which the policy is explicitly and clearly applied, proportionate to the number of investment categories that are relevant for that financial institution. If all relevant investment categories are covered, the scope score is 100%, yielding a final element score of 1.

In some situations, the content of the policy is partially, but not fully sufficient, for instance when:

- The text of the policy contains a commitment in line with the assessment element, but is too vague;
- The policy meets some, but not all of the scoring criteria of the assessment element; or
- The financial institution has taken an initiative[i] in line with the spirit of the assessment element, but it is not (yet) formalized in its financing or investment policy.

In these cases, a *basic score* is granted, but the *scope score* is not increased and remains 50%, yielding a final element score of 0.5. Table 2 shows the different scoring possibilities in practice for both the content and the scope of the policy, including the final element score.

Table 2 Scoring possibilities for policy assessments

Content of policy	Basic score	Scope of policy	Scope score	Final score
None or insufficient	0	*Not relevant*	50%	0
Partially sufficient	1	*Not relevant*	50%	0.5
Sufficient	1	Unclear	50%	0.5
Sufficient	1	Applied to one or more categories	50-100%	0.5-1
Sufficient	1	Applied to all categories	100%	1

The scores for all elements included in a theme are added together and then divided by the total number of elements. This results in the *final score* for a theme. Fair Finance coalitions are free to present the outcome as a single number between 0 and 10 or as a percentage. Each coalition can also attach qualifications of their choice, such as sufficient, good, or excellent, to this score.

Fair Finance International acknowledges that smaller and locally oriented banks could be less exposed to sustainability risks than financial institutions targeting midsize, large, and multinational

[i] Such initiatives could be, among others: setting up or participating in meetings with business clients or other companies and stakeholders; participating in a round table or something similar; signing an investor statement; engaging in collective dialogue; and publishing brochures describing the issues and suggesting solutions or steps.

companies, operating in countries all over the world and with long, complicated supply chains. Therefore, researchers have the flexibility to handle situations differently when a financial institution can credibly demonstrate that an element is not relevant to them. If, due to its business orientation or geographical presence, the financial institution is not exposed to the risk of breaching a principle specified in the assessment element, the element can be considered non-applicable, or “n.a.”. Non-applicable assessment elements are not counted towards the total score for a theme. Elements can also be considered fulfilled in some cases where effective national legislation is in place in the countries where all the companies, that a bank lends to or invests in, are active.

1.4.5 Determining relevancy

Before assessing a financial institution based on the Fair Finance Guide International Methodology, the researcher needs to determine the relevancy and materiality of the different “investment categories” for this particular financial institution. Also, the relevancy of different industrial sectors for the financial institution needs to be assessed, as some assessment elements are only relevant if the financial institution is financing, or investing in, that specific sector. The following considerations are used to determine the relevancy of investment categories and sectors for a specific financial institution:

- **Corporate credits**

  The Methodology expects that a financial institution has a policy for corporate credits if the corporate credits portfolio makes up:

  - more than 0.5% of the total balance sheet; or
  - a minimum of EUR 50 million.

  The number of corporate loans, the size of the companies receiving the corporate loans and the amount loaned per company are not of importance in assessing the relevancy of this investment category.

  Corporate credits are considered to be outside the scope of the assessment of pension providers, including when the pension provider is part of a banking group.

- **Project finance**

  The Methodology expects that a financial institution has a policy for project finance if the project finance portfolio makes up:

  - more than 0.5% of the total balance sheet; or
  - a minimum of EUR 50 million.

  The number of project finance loans, the size of the companies or projects receiving the project finance loans and the amount loaned per project are not of importance in assessing the relevancy of this investment category.

  Project finance is considered not to be relevant for the assessment of pension funds and insurance companies, also when the pension provider is part of a banking group.

- **Private mortgages**

  The Methodology focuses on the financial relationships between companies and financial institutions. A category like private mortgages therefore falls outside the scope of the FFGI Methodology, but for some banks it is an important asset. However, the sustainability challenges within many of the selected themes are not directly relevant for this type of investment.

- **Proprietary assets**

  To determine the relevancy of the investment category Proprietary assets, the FFGI Methodology analyses the following asset classes in the financial institution's financial reporting:

  - Government bonds;
  - Shares and corporate bonds;
  - Derivatives;
  - Real estate and securities; and
  - Other/undefined.

  The FFGI Methodology does not assess investment policies regarding government bonds. If a financial institution explicitly states that it mainly invests in government bonds, the category Proprietary assets can be considered as non-applicable ("n.a.") to this financial institution. This is particularly relevant for banks, because in practice, most commercial banks invest their proprietary assets in government bonds or sovereign/supranational bonds because they are stable and liquid assets. Additionally, in many jurisdictions the proprietary investments of banks are regulated to avoid excessive risk-taking.

  Ultimately, coalitions can decide whether to assess this scope based on the characteristics of the bank under evaluation.

- **Asset management**

  Financial institutions involved in asset management rarely develop a common policy for all their asset management activities. This is due to the organisation's structure. Financial institutions often have several subsidiaries in the field of asset management, and these could all have their own policies. Often they even apply specific policies for different products, such as individual investment funds and mandates. As a result, there might be hundreds of different investment products that all may have their own specific policy. This makes the policy assessment for this investment category difficult.

  Furthermore, the FFGI Methodology does not assess all types of asset management, because they are not all relevant. The asset management subsidiaries of financial institutions are not always free to choose whether to provide capital to certain companies or governments. And sometimes it is not possible for these asset management companies to deploy instruments on 'responsible investment'. Based on the following criteria it has been determined whether the various asset management activities are included in the assessment by the FFGI Methodology:

  - Will capital be at the disposal of companies as a result of this kind of asset management?
  - Will the financial institution have freedom of choice and/or responsibility when providing this kind of asset management (possibly under certain conditions)?
  - Is the financial institution able to use sustainable investment instruments when providing this financial service?

  Based on these criteria, the FFGI Methodology includes the following types of asset management in the scope of the assessment of the policies of each financial institution:

  - The financial institution's own investment funds: investment funds that have been assembled and offered by the financial institution itself to private and institutional investors;
  - Private banking: all forms of discretionary management of private investors' money, meaning both direct investments in shares and bonds regarding other parties' investment funds;
  - External Mandates: investments in shares and bonds or in investment funds, using institutional investors' money (i.e. pension funds, insurance companies);

- Internal client relations: investments in shares and bonds or in investment funds, using internal clients' money (including insurance premiums paid by external clients).[i]

Types of asset management not included in the assessment of the scope of the policy are:

- Advice regarding private banking;
- Taking charge of shares for private or institutional investors (custodian services).

Under certain circumstances, the category asset management may not be part of the policy assessment of pension providers. This is specifically when autonomous pension funds have an in-house asset manager that also manages the assets of other pension funds, who are then considered the clients of the asset manager. Previous research by FFI shows that the latter pension funds have their own responsible investment policies. Because the coalition then assumes that all these pension funds have their own responsible investment policies, it is less relevant to consider the client asset management activities of these asset managers in the research. That becomes even more apparent when only part of the selected pension providers has asset manager subsidiaries working for other clients, and most of these clients are subject of FFI research themselves.

Depending on the situation in the country, the selection of financial institutions for the guide, the relevant activities of the selected entities and the priorities and strategies of the coalition setting up the guide, coalitions may decide not to assess the policies of these asset managers. The research then only includes the FFGI Methodology scope category *proprietary assets*.

Finally, in order to be able to take into account the scope of responsible investment policies for asset management, the FFGI Methodology looks at the total volume of assets that are managed and to which a responsible investment policy is applied. If a financial institution has different responsible investment policies for their different products, the policy that applies to the largest part of assets under management will be assessed.

If this is the case for other investment categories, the same rule applies.

- **Sectors**

  General policies often apply to all investments and financial services, while sector policies concern a limited part of the investments of a financial institution. Therefore, principles that have been included in the financial institution’s sector policy and only apply to companies active in a specific sector do not count for the assessment of the cross-cutting themes.

  If the financial institution can prove or explicitly and publicly states that it is not involved with companies operating in a certain sector, the financial institution is not expected to have a policy for this sector. In that case the element is considered “non-applicable” (n.a.). If it is the case for all types of investments researched, the sector as a whole can receive this qualification.

  If a financial institution does not make an explicit statement that it is not active in a particular sector, the decision for applying n.a. can be made based on information about the portfolio in the annual report(s) of the financial institution and its subsidiaries. For defining the maximum level of investments in one of the investment categories (threshold), the FFGI Methodology uses the breakdown of the portfolio:

i Investments using insurance premiums are on the parent company’s balance sheet and they therefore fall within the scope of investments using the bank’s own resources and are not part of asset management. Since these investments are not part of the banking branch of the financial institution and therefore may not be financed with saver’s money, they are categorized as asset management.

- If the sector is explicitly mentioned in the breakdown of its, for example, corporate credit portfolio, apply n.a. when less than 0.2% and a maximum of EUR 1 million of total corporate credits is lent to that specific sector.
- If the sector is mentioned together with other sectors (e.g. public administration, defence and social security), then apply n.a. when this is together less than 1.0% and a maximum of EUR 5 million of total corporate credits.
- If the sector is not mentioned explicitly, but only overarching and overlapping sectors and definitions such as manufacturing, other, or 'building materials and construction', do not apply n.a.
- The same applies to the other types of investment (project finance, asset management for own account and asset management for the account of clients).
- If there is not enough information available regarding the portfolio, the qualification n.a. cannot be given.

Note that the companies operating in a certain sector do not only include primary producers. Also trade, transport, warehousing, processing, and finally, retail companies are part of the supply chain and therefore belong to this sector.

1.4.6 Documents assessed

The Fair Finance Guide Methodology expects that the policies of the financial institution, or at least summaries of it, is made public, for example through its website or in the annual report.

Sometimes a financial institution makes a statement about a decision considering a certain issue in a newsletter or press release. In the first year after publication, the Fair Finance Guide Methodology considers these as valid sources of information, but it also expects the financial institution to integrate the decisions in its investments policy – as the employees who will make the decisions about investments will not take all these newsletters, brochures etc. into account. When updating the policy review, the Fair Finance Guide Methodology requires to check whether the principle is part of the general policy documents. If a financial institution published a principle in newsletters or documents in the period before the previous update was published, and has not integrated this principle into policy documents, it will not be considered as a principle for this year's policy update.

The policy assessment is based on the public documents of the assessed financial institution. Information provided by third parties, such as the external asset managers hired by pension providers, is not taken into account, unless the financial institution clearly refers to those policies on its own website, or in its own documentation. Information published on the websites on international standards and or initiatives covering financial institutions under review - such as the Equator Principles, the United Nations Global Compact, the Principles for Responsible Investment - are taken into account.

Previous research showed that pension providers, especially the smaller pension funds, tend to rely on the external asset managers and their detailed policies. As per exception, the documents of external managers may be used for the assessment in case the pension provider has published a commitment declaring that it aims to invest responsibly, outsources the asset management to one or more external parties and refers to their policies as being applicable to the assets of the pension provider. Moreover, the documents of the external parties mentioned in the commitment must be available on the website of the pension provider. In case a pension provider refers to policies of various asset managers, the policy that covers most assets will be taken into consideration.

The policy assessment for the theme Consumer Protection (see section 3.1) uses as reference more specific documents in addition to the documents and information sources commonly used in the FFGI Methodology. Preference is given to official sources and sources recognized by the financial institutions themselves, to minimize disputes and to maximize the objectivity of the analysis. Documents may include:

- Ombudsman reports of an ombudsman for the banking sector; and
- Reports on consumer complaints of public consumer protection institutions.

1.4.7 Scoring standards and initiatives which financial institutions have adopted

Ideally, financial institutions write a policy presenting the principles that are used in the process for decision making regarding finance and investments. Alternatively, they can state which international standards and initiatives they expect companies to comply with. Some of the standards and initiatives the FFGI Methodology references, are considered sufficient for scoring when used in the process for decision making regarding finance and investments.

When assessing the policies of financial institutions, not only the policies that the financial institution has developed itself but also the broader standards and initiatives adopted or endorsed by the financial institution are taken into consideration. These include sustainability initiatives which can be undersigned by financial institutions, such as the Equator Principles, and the Principles for Responsible Investment (PRI). Undersigning these initiatives represents an obligation to apply certain sustainability criteria on the investments and financial services of a financial institution.

The IFC Performance Standards and the IFC Environmental, Health, and Safety Guidelines were also specifically developed for financial institutions. However, financial institutions cannot undersign them, or become members, in the way they can for the Equator Principles and the PRI. For this reason, financial institutions can receive points for certain elements covered by these standards, but only when the financial institution makes clear that it applies these standards in full for its financing and/or investment decisions. Since the Equator Principles, a major international standard for project finance, are based on the IFC Standards, financial institutions can receive basic scores and scope scores for project finance for the elements sufficiently covered by the IFC Standards when they are signatories of the Equator Principles.

Other major initiatives and standards such as the UN Global Compact, the UN Guiding Principles for Business and Human Rights (UNGPs), the OECD Guidelines for Multinational Enterprises, and others, have not been developed specifically for financial institutions. Therefore, financial institutions cannot undersign these standards, and the standards do not oblige financial institutions to apply the criteria to their investments and financial services. But financial institutions can adopt these initiatives, by stating explicitly that they apply in full the procedures and criteria described in these documents when taking financing and investment decisions. In other words, financial institutions can apply these standards to their financing and investment activities by stating explicitly that they expect financed and investee companies to adhere to these standards.

Such an explicit statement of the above-mentioned sustainability initiatives and standards, thus means that a financial institution could adhere to one or more of the principles (elements) defined in the assessment methodology, although the element as such is not mentioned in the policy documents of the financial institution itself. Financial institutions that have signed a standard or initiative, or mention a standard or initiative in their policies, and make clear that it is applied to the financing of and investment in companies, therefore receive a basic score for each element that is clearly included in that particular standard. This score will be multiplied with the scope score for each investment category to which the policy is explicitly applied as well.

1.5 Case studies

The Fair Finance International network hopes to stimulate a process that leads to ever increasing tightening of the norms used by financial institutions (race to the top) in social, environmental, and governance fields and to enhance the constructive role these financial institutions can play in creating a just and sustainable world. Naturally, the policy the financial institution has formulated is only one of the necessary steps.

Equally important is the issue whether the financial institutions themselves, when making decisions on their investments, in practice comply with the norms recorded in widely supported international standards, such as conventions, guidelines, certifications and codes of conduct. Therefore, in case studies the CSOs collaborating in the Fair Finance International network investigate the operational practices, strategies and instruments and evaluate the investments and financial services of the researched financial institutions. The outcomes of these studies are reported on the websites of the different Fair Finance coalitions, but do not lead to a downgrade or upgrade of the policy assessment scores.

2

Cross-cutting themes

2.1 Biodiversity

2.1.1 Assessment elements

Financial institutions can influence the protection of biodiversity, especially if they invest in or finance industries with a potentially large influence on nature, such as forestry, the extractive industry, the oil and gas industry, fishery, water supply and infrastructure and industries that make use of genetic material, such as agriculture, biotechnology, the medical industry, and the cosmetic industry.

For companies there are various grounds for putting biodiversity high on the agenda. This includes more stringent rules to protect ecosystems and more stringent supervision, increased costs in product chains that depend on certain ecosystems, changes in consumption patterns and pressure from society and social organisations. Moreover, new commercial chances for companies arise in situations where commerce and nature management go hand in hand. Financial institutions can capitalise on this development.[14]

In order to address the risks for natural areas and other threats to biodiversity, financial institutions have to draft an investment policy in line with international conventions and national legislation. The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:

1. The financial institution measures and discloses the biodiversity footprint of its portfolio.
2. Companies prevent negative impacts on High Conservation Value (HCV) areas within their business operations and the areas they manage.
3. Companies prevent negative impacts on protected areas that fall under the categories I-IV of the International Union for Conservation of Nature (IUCN) within their business operations and the areas they manage.
4. Companies prevent negative impacts on UNESCO World Heritage sites within their business operations and the areas they manage.
5. Companies prevent negative impacts on protected areas that fall under the Ramsar Convention on Wetlands within their business operations and the areas they manage.
6. Companies prevent negative impacts on endangered plant and animal species
7. Production of, or trade in, living genetically modified organisms can only take place if permission has been obtained from the importing country and all requirements of the Cartagena Protocol have been met.
8. Companies conduct water scarcity impact assessments in water scarce regions.
9. Companies have comprehensive mitigation measures in place to address community and ecosystem water requirements in areas where environmental impact assessments identify that significant impacts to water resources are likely.

10. Companies make an environmental impact assessment of the total consequences of a large scale project on biodiversity, at least according to GRI 304: Biodiversity 2016 or other relevant standards (mentioned in section 2.1.3 of the FFGI Methodology).
11. Enlarging plastics production capacity is unacceptable.
12. Companies in relevant industries reduce their plastic footprint.
13. Companies in relevant industries transparently disclose their plastic footprint, including the proportion of fossil-based virgin plastics production/use compared to their total plastics production/use.
14. Deep sea mining is unacceptable.
15. Companies integrate criteria on biodiversity into their procurement and operational policies.
16. Companies include clauses on the compliance with criteria on biodiversity in their contracts with subcontractors and suppliers.

2.1.2 What is at stake?

The biological diversity of planet earth - its ecosystem diversity, species diversity and genetic diversity - forms a complex web of life that is of great importance to the economic and social development of our society, for our culture and for our leisure facilities. Nature is declining globally at rates unprecedented in human history — and the rate of species extinctions is accelerating, with grave impacts on people around the world now likely, warned a landmark report from the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) in 2019.[15]

The loss of biodiversity imposes huge potential costs and risks, such as the destruction of habitats, the loss of the functions of ecosystems, the threat of a reduced food supply and the loss of medicinal plants. The care for the natural riches of the world is a moral and ethical responsibility for all mankind. In addition, the 2021 review of the Economics of Biodiversity, commissioned by the Treasury of the United Kingdom and carried out by professor Partha Dasgupta, reveals that nature is “our most precious asset” crucial to the human economy, but that current demand far exceeds the natural world’s ability to supply the ecosystem services and goods the human economy relies on.[16]

An additional argument to take action on biodiversity is that financial institutions otherwise become exposed to nature-related financial risks, warns the Network for Greening the Financial System. This organisation of central bankers and financial supervisors therefore published a Conceptual Framework to guide Action by Central Banks and Supervisors on Nature-related Financial Risks in 2024.[17]

In 2016, the UNEP released the Global Environmental Outlook (GEO-6): Regional Assessments. These are six separate reports that offer detailed examinations of the environmental issues affecting each of the world’s six regions: the Pan-European region, North America, Asia and the Pacific, West Asia, Latin America and the Caribbean, and Africa. The reports find that the world shares a host of common environmental threats that are quickly becoming worse in many parts of the world. For example, in almost every region, the combination of population growth, rapid urbanization, rising levels of consumption, desertification, land degradation and climate change lead to countries suffering from severe water scarcity. These worrying trends are also making it increasingly hard for the world to feed itself, warn the reports. Despite the negative outlook, the reports conclude that there is still time to change course on several issues.[18] At the moment of writing, UNEP is updating this study with the GEO-7.[19]

According to the Intergovernmental Panel on Climate Change (IPCC) in 2022, "climate change is causing dangerous and widespread disruption in nature and affecting the lives of billions of people around the world, despite efforts to reduce the risks. People and ecosystems least able to cope are being hardest hit. (…) Increased heatwaves, droughts and floods are already exceeding plants' and animals' tolerance thresholds, driving mass mortalities in species such as trees and corals. These weather extremes are occurring simultaneously, causing cascading impacts that are increasingly difficult to manage. (…) Climate change interacts with global trends such as unsustainable use of natural resources, growing urbanization, social inequalities, losses and damages from extreme events and a pandemic, jeopardizing future development." [20]

Preserving nature is recognized by the Sustainable Development Goals (SDGs) and specifically by the SDGs 14 and 15, which focus on targets to preserve nature. SDG 14: Life Below Water includes targets to reduce marine pollution, sustainably manage and protect marine and coastal ecosystems, minimize and address the impacts of ocean acidification, effectively regulate harvesting and end overfishing, illegal and destructive fishing practices, and many more.[21] Similarly, SDG 15: Life on Land promotes the implementation of sustainable management of all types of forests, halt deforestation, restore degraded forests and substantially increase afforestation and reforestation, restore degraded land and soil, reduce the degradation of natural habitats, halt the loss of biodiversity and many more.[22]

Furthermore, SDG 2: Zero Hunger focuses on ensuring food security to everyone without compromising on nature.[23] SDG 3: Good Health and Well-being targets to substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination, which indirectly also benefit nature, besides the well-being of people.[24] SDG 6: Clean Water and Sanitation includes a target to improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials, halving the proportion of untreated wastewater and substantially increasing recycling and safe reuse globally. This target also contributes to preserving nature.[25]

According to the Partnership for European Environmental Research, *greening* the economy requires "that natural assets continue to provide the resources and ecosystem services on which our well-being relies".[26] A study of this group of European academics concluded: "transitioning to green economies is never purely based on win-win solutions, but requires taking into account potential trade-offs among multiple goals, across sectors and international leakage. The case studies indicate the need for far-sighted and multiple-source planning of funding of green economy initiatives".[27]

Generating this funding requires an active role by financial institutions. According to WWF International, "the finance sector is an extremely powerful lever for change that can drive the transition to an equitable, net zero, nature-positive economy." The nature conservancy organisation also emphasizes: "Globally, nature represents a massive investment opportunity. Transitioning to a nature-positive economy could generate annual business opportunities worth $10 trillion and create 395 million jobs by 2030."[28]

Simultaneously, financial institutions should avoid financing of business activities that harm biodiversity. "The financial sector is playing a critical role in accelerating the global biodiversity crisis (…) global finance drives tropical deforestation and ecosystem degradation", according to the Forests & Finance coalition. The coalition also signals that recent financial sector initiatives in this field have not yet resulted improvements: "The 2024 report also highlights the failures of voluntary corporate initiatives such as the Principles for Responsible Banking (PRB), the Net-Zero Banking Alliance (NZBA), and the Taskforce on Nature-related Financial Disclosures (TNFD). While these initiatives claim to promote sustainable practices, more than half of the top 30 banks financing sectors linked to deforestation are members of such groups. We also found no evidence to suggest these initiatives have curbed harmful financial flows."[29] NGOs and rights holders have also expressed concerns about the credibility of the TNFD initiative. In particular they have warned about the risk of greenwashing associated with the initiative whose decision-making body is a task force composed entirely of corporations and no government officials, scientists, victims of corporate harms, environmental defenders, indigenous peoples nor even small business.[30]

The financing and investment policies of financial institutions should ensure that financial institutions are only involved in financing companies and governments that aim to prevent further loss to biodiversity and also put this principle into systematic practice. When developing policies in this respect, financial institutions can make use of the international standards described in section 2.1.3.

2.1.3 International standards and initiatives

The main international standards on nature are summarised per topic, followed by the assessment elements that are formulated by the FFGI Methodology as a result:

- **Biodiversity impact assessment and footprinting**

  In April 2006, the Voluntary Guidelines on Biodiversity-Inclusive Impact Assessments were published by the CBD. These guidelines include clear instructions on how nature criteria can be included in environmental impact assessments.

  The best known guidelines for sustainability reporting in general are the Global Reporting Initiative (GRI) Standards. The new GRI Universal Standard was released in 2021, will be complemented by various *Sector* and *Topic Standards*.[31] The GRI Standards include a specific *Topic Standard* on biodiversity, GRI 304: Biodiversity 2016.[32]

  Impact and dependencies on biodiversity play an important role from a risk and opportunity perspective. The Partnership for Biodiversity Accounting Financials (PBAF) standard launched in June 2022 provides financial institutions with practical guidance on biodiversity impact and dependency assessments and defines what is needed in order for these assessments to deliver the right information to financial institutions. The PBAF Standard consists of three different documents - a Q&A, an overview of approaches and a document on biodiversity footprinting.

This leads to assessment element	
1	The financial institution measures and discloses the biodiversity footprint of its portfolio.
10	Companies make an environmental impact assessment on the total consequences of a large scale project on biodiversity, at least according to GRI 304: Biodiversity 2016 or other relevant standards (mentioned in section 2.1.3 of the FFGI Methodology).

- **Protection of ecosystems and habitats**

  Various international agreements require the protection of ecosystems and natural habitats:

  - The 1992 UN Convention on Biological Diversity (CBD) demands that each member state establishes a system to preserve the biodiversity in protected areas, or ensure the protection of ecosystems in other ways. Virtually all countries in the world have signed the convention.[33] In December 2022, the signatory countries of the CBD adopted the Kunming-Montreal Global Biodiversity Framework (GBF) at the COP15 in Canada, which sets out an ambitious pathway to reach the global vision of a world living in harmony with nature by 2050. Among the Framework's key elements are 4 goals for 2050 and 23 targets for 2030.

    The GBF promises the "effective conservation and management of at least 30% of the world's lands, inland waters, coastal areas and oceans, with emphasis on areas of particular importance for biodiversity and ecosystem functioning and services", to "reduce by half both excess nutrients and the overall risk posed by pesticides and highly hazardous chemicals", as well as to "require large and transnational companies and financial institutions to monitor, assess, and transparently disclose their risks, dependencies and impacts on biodiversity through their operations, supply and value chains and portfolios."[34]

- The 1982 UN Convention on the Law of the Sea (UNCLOS) obliges all signatory countries to protect and preserve the biodiversity in ocean areas. The protection of specific ocean areas is dealt with in the Regional Seas Conventions, which falls under the UN Environmental Programme (UNEP). Also, the International Coral Reef Initiative focuses on specific ocean areas.
- The biodiversity in areas that are important on environmental and cultural grounds falls under the protection of the UNESCO World Heritage Convention.
- For *wetlands* (swamps and bogs), which are rich in biodiversity, the Ramsar Convention on Wetlands ensures protection and proper management.
- The International Union for Conservation of Nature (IUCN) has developed a system that categorises natural areas in six categories and indicates in which areas biodiversity has to be protected (category I to IV). In addition, the IUCN provides guidelines for companies on how to deal with fields that fall within these Protected Area Management Categories. The United Nations Environmental Assembly adopted a resolution on pollution mitigation by mainstreaming biodiversity into key sectors in 2017: "The resolution aims at strengthening efforts to integrate conservation and sustainable use of biodiversity in various sectors such as agriculture, fisheries and aquaculture, tourism, mining and energy, infrastructure and manufacturing among others. It also points to the need to prevent and reduce pollution from these sectors".[35]
- In December 2022, the European Parliament and the European Council reached a provisional political agreement regarding the proposed the EU Regulation on deforestation-free supply chains (EUDR) to minimise EU-driven deforestation and forest degradation.[36] All relevant companies will have to conduct strict due diligence if they want to import, sell, or export palm oil, cattle, soy, coffee, cocoa, timber and rubber as well as derived products (such as beef, furniture, or chocolate) in/from the European market.[37] In December 2024, the application date of the EUDR was postponed to 30 December 2025.[38]
- In December 2022, a global agreement aimed at halting and reversing biodiversity loss was adopted by all the member nations of the Convention on Biological Diversity during the 15th Conference of the Parties (COP15) to the Convention on Biological Diversity (CBD). This agreement, the Kunming-Montreal Global Biodiversity Framework, includes ambitious targets, such as protecting 30% of the Earth's land and marine areas by 2030, and reforming harmful subsidies by reducing them by $500 billion annually by the same year. While the framework has been adopted by all CBD member nations, it is not a legally binding treaty. Instead, participating countries are expected to integrate its goals into their national biodiversity strategies and action plans.[39]
- The High Seas Treaty is a historic UN treaty intended to protect marine life in ocean areas beyond countries' national waters. It complements the United Nations Convention on the Law of the Sea (UNCLOS), which provides the legal framework under which all human activities in the ocean take place. The High Seas Treaty will allow marine protected areas to be established in the high seas at a global level, safeguarding the ocean from human pressures in a major contribution to reducing climate change, protecting biodiversity and achieving the objective to protect at least 30% of the planet by 2030. The Treaty was opened for signatures in September 2023. Over 105 countries have already signed, and 15 have ratified it. After 60 ratifications, the Treaty automatically comes into force.[40]

This leads to assessment elements	
2	Companies prevent negative impacts on High Conservation Value (HCV) areas within their business operations and the areas they manage.

This leads to assessment elements	
3	Companies prevent negative impacts on protected areas that fall under the categories I-IV of the International Union for Conservation of Nature (IUCN) within their business operations and the areas they manage.
4	Companies prevent negative impacts on UNESCO World Heritage sites within their business operations and the areas they manage.
5	Companies prevent negative impacts on protected areas that fall under the Ramsar Convention on Wetlands within their business operations and the areas they manage.

- **Protection of plant and animal species**

  The most obvious step for the preservation of biodiversity is the protection of endangered species of flora and fauna. A leading report of endangered species is the IUCN Red List of Threatened Species. The habitat of these endangered species is protected by the Convention on the Conservation of Migratory Species of Wild Animals (1979). This treaty also aims to restrict exploitation of areas where wild and endangered migratory animal species reside. Other global and regional conventions prohibit or restrict the commercial exploitation of whales, migratory birds, polar bears, sea turtles and seals.[41] Companies should have policies in place to avoid negative consequences to the habitats of endangered species.

  The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) sets stringent conditions for the international trade in all endangered species with demands for national legislation from the countries that have ratified the convention. CITES applies three lists with species that are threatened with extinction to different degrees. Animal and plant species included in Appendix I may only be traded in exceptional situations, while the trade in species included in Appendix II is monitored to ensure that they are not endangered. Appendix III concerns species that are endangered in at least one country and where other countries are asked for help in monitoring the trade.[42]

  Companies should at least adhere to the conditions of CITES, but preferably refrain from trade in species on all appendices of the CITES list.

  Besides the protection of endangered animal species, conservation of nature requires that animal species that are not (yet) endangered are not unduly captured. The CBD demands that countries “restore habitats and use their resources in a sustainable way to ensure species diversity”.[43] This topic is also dealt with in section 4.2 on Food and section 4.3 on Forestry.

This leads to assessment element	
6	Companies prevent negative impacts on endangered plant and animal species.

- **Protection of genetic material**

  The UN Convention on Biological Diversity (CBD) demands that companies that want to have access to genetic material from abroad have to obtain prior permission from the exporting country and have to make clear agreements for the use of the material.

  The Bonn Guidelines are recognized as a useful first step in the implementation of relevant provisions of the CBD and are meant to assist stakeholders in developing access to genetic resources and benefit-sharing strategies.

  The Cartagena Protocol on Biosafety to the Convention on Biological Diversity (Cartagena Protocol) speaks about Living Modified Organisms (LMOs) which are in every day usage known as Genetically Modified Organisms (GMOs). These are defined as any living organism that possesses a novel combination of genetic material obtained through the use of modern biotechnology. The Cartagena Protocol does not prohibit the use of GMOs in itself but has developed a framework for the safe handling, transport and use of GMOs that may have a harmful effect on biodiversity and human health and entail trans-boundary risks. The protocol also requires permission from the importing country before it is permitted to import GMOs.

Adopted as a supplementary agreement to the Cartagena Protocol on Biosafety, the Nagoya-Kuala Lumpur Supplementary Protocol aims to contribute to the conservation and sustainable use of biodiversity by providing international rules and procedures in the field of liability and redress relating to living modified organisms. The Protocol applies to damage resulting from living modified organism which find their origin in a transboundary movement.

This leads to assessment element	
7	Production of, or trade in, living genetically modified organisms can only take place if permission has been obtained from the importing country and all requirements of the Cartagena Protocol have been met.

- **Water use**

Given the growing challenge of water scarcity in many regions of the world, it is vital that companies and financial institutions become aware of their own influence on water related problems. First of all, companies should engage with stakeholders in order to learn how to avoid negative impacts and limit their water use wherever possible. However, this alone is not sufficient, commitments to improve practices are necessary. Companies should be aware of the possible negative effects their operations could have in a possible location for business operations.

This should consider effects both in the short term and in the long term, in order to, for example, prevent competing with communities for water, now and in the foreseeable future. Companies should measure and calculate their water use. Furthermore, serious efforts to curb pollution of water resources and negative effects on other water users are also required. Finally, companies should be able to demonstrate that they are saving water and set goals to improve this. Various initiatives, guidelines and standards have emerged in recent years, to help companies address water risk.

Initiatives companies could participate in and learn from are:

- The UN Global Compact's CEO Water Mandate is a public-private initiative designed to assist companies in the development, implementation and disclosure of water sustainability policies and practices;
- UNEP and CEO Water Mandate Guidance on Corporate Water Accounting;
- The European Water Stewardship Program; and
- The Water Footprint Network, which also has a standard on assessing a global water footprint.

There are several guidelines and water 'footprinting' methods as well as voluntary disclosure initiatives for calculating water use, water risk, understanding water issues and creating a sound water strategy, such as:

- The CDP's Water Program, to calculate and publish corporate water use throughout the supply chain;
- The GEMI Water Sustainability Tool;
- The WRI Aqueduct Water Risk Atlas;
- The WWF Water Risk Filter; and
- The AWS International Water Stewardship Standard is supported by a verification process, that defines a set of water stewardship criteria and indicators for how water should be stewarded at a site and catchment level in an environmentally, socially, and economically beneficial manner.

This leads to assessment elements

8	Companies conduct water scarcity impact assessments in water scarce regions.
9	Companies have comprehensive mitigation measures in place to address community and ecosystem water requirements in areas where environmental impact assessments identify that significant impacts to water resources are likely.

- **Plastics**

  In July 2017, the United Nations met on the implementation of Sustainable Development Goal 14: Preserve and make sustainable use of oceans, seas and marine resources. All countries agreed to "implement long term and robust strategies to reduce the use of plastics and microplastics, in particular plastic bags and single use plastics, including by partnering with stakeholders at relevant levels to address their production, marketing and use".[44] In 2018, the EU Commission proposed a Directive on the reduction of the impact of certain plastic products on the environment, which included a ban on many types of single-use plastics, consumption reduction and collection targets, and labelling requirements. In May 2019, the Basel Convention was amended to include plastic waste "in a legally-binding framework which will make global trade more transparent and better regulated, whilst also ensuring that its management is safer for human health and the environment".[45]

  In March 2022, UN Member States representatives endorsed an agreement during the fifth session of the UN Environment Assembly (UNEA-5.2) in Nairobi to end plastic pollution and forge an international legally binding agreement. This agreement should address the full lifecycle of plastic from source to sea.[46] During the 5th negotiating session, from end of November to early December 2024 in Busan, South Korea, no agreement on a treaty was reached yet. Negotiations will be resumed in 2025.[47]

  Furthermore, the EU Packaging and Packaging Waste Directive (PPWD) sets out recycling targets of used packaging for EU Member States and also contains requirements for packaging that aim to reduce packaging waste and to put forth design requirements. Targets are set for 2025 and 2030.

  In 2021, the UN Principles for Responsible Investment (PRI) and the Ellen MacArthur Foundation (EMF) have published new guidance for investors on how to engage with companies on plastic waste and pollution. Guidelines are published for the different actors in the plastics value chain, including petrochemicals, containers and packaging, FMCGs and on waste management. The Plastic Banks Tracker, launched in October 2024, evaluates the plastic policies of 20 international banks.

This leads to assessment elements	
11	Enlarging plastics production capacity is unacceptable.
12	Companies in relevant industries (oil and gas, chemicals, containers and packaging, food and beverage, personal and household products, FMCGs) reduce their plastic footprint.
13	Companies in relevant industries (oil and gas, chemicals, containers and packaging, food and beverage, personal and household products, FMCGs) transparently disclose their plastic footprint, including the proportion of fossil-based virgin plastics production/use compared to their total plastics production/use.

- **Deep seabed mining**

  Deep seabed mining is a mining practice in which mineral deposits are extracted and often excavated from the deep seabed, which is at ocean depths greater than 200 meters, and covers about two-thirds of the total seafloor. Deep seabed mining has potentially devastating effects on ocean ecosystems and livelihoods dependent on a healthy ocean.[48] Since the exact negative environmental and social risks of deep seabed mining are not yet properly understood, the 2021 IUCN World Conservation Congress adopted a resolution calling for a moratorium on seabed mining until, amongst others, “the environmental, social, cultural and economic risks of deep seabed mining are comprehensively understood” and “the precautionary principle, ecosystem approach, and the polluter pays principle have been implemented”.

This leads to assessment element	
14	Deep seabed mining is unacceptable.

- **Other guidelines for companies**

  The High Conservation Value (HCV) concept was initially conceived within the framework of certification of forest management and wood products (High Conservation Value Forests or HCVF), but can be applied to all ecosystems and natural living environments. The HCV Resource Network has developed national implementation guidelines, local projects, training, and workshops.

  The IUCN manages a website with approaches and conservation tools for companies: Conservation tools.

  The ISO 26000:2010 Guidance on social responsibility states that organisations behave socially responsible if they value and protect biodiversity; value, protect and restore ecological services; use land and natural resources in a sustainable way and develop areas in an environmentally responsible way.[49]

  The International Finance Corporation’s (IFC) Performance Standard 6 concerning Biodiversity Conservation and Sustainable Management of Living Natural Resources determines how companies should operate in order to avoid negative consequences on areas of high biodiversity value, including impact on natural habitats as well as endangered and endemic species. The requirements in the standard have been guided by the Convention on Biological Diversity.

  In 2017, the ISO developed an environmental management standard to guide the development of proper practices in combating land degradation and desertification. The first part of the standard, ISO 14055-1:2017, elaborates the good practices framework. An accompanying and supporting document ISO/TR 14055-2has been launched to provide supportive regional case studies on how to apply the framework to a range of land degradation and desertification cases.

  Several large companies, notably traders in the palm oil sector such as Archer Daniels Midland and Wilmar International (the latter controls roughly 45% of the global market in palm oil), have adopted ‘No Deforestation, No Peat, No Exploitation’ (NDPE) policies in recent years. These policies set a high benchmark, often allowing no deforestation, no peat development, and no conflicts, in their own operations or in their supply chain. Although in these first cases directed at the palm oil sector, financial institutions may apply the policies to other sectors causing deforestation, peat loss and conflicts as well.[50]

  In September 2020, 55 financial institutions representing over EUR 9 trillion in assets signed the Finance for Biodiversity Pledge, committing to reduce their negative impacts on biodiversity of their financial activities by knowledge sharing, engaging with companies, assessing biodiversity impacts of their financial activities, setting measurable targets, and publicly reporting about positive and negative impacts of their financial activities on global biodiversity goals.[51]

- **Procurement and supply chains**

  Companies are often part of long procurement and supply chains. They can monitor one another and question how they respect local and national legislation and international norms on labour rights. The requirements that companies set for their suppliers can be included in contractual agreements.

The importance of this has also been recognised in the OECD Guidelines for Multinational Enterprises. The OECD Due Diligence Guidance for Responsible Business Conduct provides practical support to companies on the implementation of the OECD Guidelines for Multinational Enterprises by providing plain language explanations of its due diligence recommendations. Implementing these recommendations can help companies avoid and address adverse impacts that may be associated with their operations, supply chains and other business relationships.

Furthermore, ISO 26000:2010 Guidance on social responsibility recognises the importance of supply chain responsibility, because "the impacts of an organisation's decisions or activities can be greatly affected by its relationships with other organisations".[52] A company's sphere of influence includes relationships within and beyond an organisation's supply chain. Moreover, ISO 26000:2010 Guidance on social responsibility recommends setting contractual provisions or incentives as a means of exercising influence.[53]

In addition, ISO 20400:2017 Sustainable procurement – Guidance provides guidelines for organisations, independent of their activity or size, on integrating sustainability within procurement, as described in ISO 26000:2010 Guidance on social responsibility. It is intended for stakeholders involved in, or impacted by, procurement decisions and processes.

This leads to assessment elements	
15	Companies integrate criteria on biodiversity into their procurement and operational policies.
16	Companies include clauses on the compliance with criteria on biodiversity in their contracts with subcontractors and suppliers.

2.2 Climate change

2.2.1 Assessment elements

Investments that take place today determine the global warming impact of future activities. Therefore, it is crucial that strict reduction objectives are set and that companies are obliged to emit less CO_2. As important financiers of energy projects, financial institutions can play a leading role in shifting investments towards a less CO_2-intensive economy. Financial institutions should apply climate policies in line with UN-objectives, in order to limit global warming.

The following elements are crucial for a policy regarding the financial institution's internal operations:

1. For its own direct and indirect greenhouse gas emissions, the financial institution establishes measurable reduction objectives that are aligned with limiting the maximum global temperature increase of 1.5°C.

The following elements are crucial for a policy regarding the financial institution's management of its portfolio of corporate loans and investments:

2. The financial institution discloses its financed emissions - meaning the absolute scope 1 and scope 2 GHG emissions associated with the companies in its lending and/or investment portfolio(s).
3. The financial institution discloses its financed emissions - meaning the absolute scope 1, 2, and 3 emissions associated with the companies in its lending and/or investment portfolio(s).
4. For large scale project financing, the financial institution requires environmental impact assessments that include data on greenhouse gas emissions and climate risks.
5. For its financed and invested greenhouse gas emissions, the financial institution establishes short, medium and long-term absolute reduction objectives that are aligned with limiting the maximum global temperature increase to 1.5°C.
6. The financial institution establishes sector-specific reduction targets for its financed emissions that are aligned with limiting the maximum global temperature increase to 1.5°C.
7. The financial institution measures and discloses climate-related impacts in line with IFRS S2 Climate-related Disclosures or the recommendations by the Task Force on Climate-related Financial Disclosures.

The following elements are crucial for a policy regarding fossil fuels:

8. Companies involved in the development of new thermal coal mines are excluded from investment and financing.
9. Companies involved in the development of new coal-fired power plants are excluded from investment and financing.
10. Companies involved in the development of new metallurgical coal mines and expansion of existing mines are excluded from investment and financing
11. The financial institution excludes financing and investing in companies active in thermal coal mining for more than 20% of their activities.
12. The financial institution excludes financing and investing in companies active in coal fired power for more than 20% of their activities.
13. The financial institution excludes financing and investing in companies that produce more than 10Mt of thermal coal per year and/or have more than 5GW in coal power capacity.

14. The financial institution has a time-bound phase-out strategy for coal that is aligned with a 1.5-degree climate scenario.
15. The financial institution fully excludes financing and investing in companies active in thermal coal mining and/or coal fired power generation.
16. Companies engaged in new oil and gas exploration and development are excluded from investment and financing.
17. The financial institution has a time-bound phase-out strategy for oil and gas that is aligned with a 1.5 degree scenario.
18. Companies active in the extraction of oil from tar sands are excluded from investment and financing.
19. The financial institution excludes financing and investing in companies active in oil and gas extraction for more than 30% of their revenues.
20. The financial institution excludes financing and investing in companies active in oil and gas-fired power generation for more than 30% of their electricity generated.
21. The financial institution fully excludes financing and investing in companies active in oil and gas extraction and/or fossil fuel fired power generation.

The following elements define expectations towards the companies a financial institution invests in or finances:

22. Companies disclose their scope 1, 2, and 3 greenhouse gas emissions.
23. Companies reduce their scope 1, 2, and 3 emissions in line with a 1.5-degree scenario.
24. Companies report emissions of air pollutants identified as having the largest impact on human health.
25. Companies have a system in place to ensure that there is zero deforestation and forest degradation in their operations and supply chain.
26. Conversion of peatland and high-carbon stocks for agricultural development is unacceptable.
27. Companies involved in 1) food- and feed-based biofuels OR 2) food- and feed-based power generation are excluded from investment and financing.
28. Companies do not participate in direct or indirect lobbying (attempting to influence decisions made by regulators) aimed at weakening climate policy.
29. Companies disclose all ISDS claims they have filed against governments, including the objective of the ISDS claim and an explanation about how the ISDS claim relates to their climate policies.
30. Companies integrate climate change criteria in their procurement and operational policies.
31. Companies include clauses on the compliance with criteria on climate change in their contracts with subcontractors and suppliers.

2.2.2 What is at stake?

The climate on earth is changing: the average global temperature is increasing. Global average land and ocean temperatures in 2023 were around 1.5°C higher than the pre-industrial average. The target of limiting global warming to no more than 1.5°C is based on the averaged value over many years, so it is not automatically considered breached by a single year exceeding this limit. However, it is a stark warning signal.[54] In its Sixth Assessment Report, published in 2021, the Intergovernmental Panel on Climate Change concluded that:[55]

- Human influence has *unequivocally* warmed the atmosphere, ocean and land, due to the increased concentrations of greenhouse gases (GHGs) in the atmosphere;
- The scale of recent changes across the climate system as a whole and the present state of many aspects of the climate system are unprecedented over many centuries to many thousands of years;
- Human-induced climate change is already affecting many weather and climate extremes in every region across the globe;
- Global average temperature increases of 1.5°C and 2°C over the pre-industrial average will be exceeded during the 21st century unless deep reductions in carbon dioxide (CO_2) and other greenhouse gas emissions occur in the coming decades; and
- Depending on future developments, global temperatures will increase between 1.0°C and 5.7°C in the 21st century.

The most important driver of climate change is the emission of carbon dioxide (CO_2), which is released with the combustion of fossil fuels. Other important GHGs include methane (CH_4) and nitrous oxide (N_2O).

The IPCC assesses that it is very likely that:[56]

- Heatwaves and droughts will become more frequent, including concurrent events across multiple locations;
- Extreme precipitation events will become more intense and frequent in many regions;
- The ocean will continue to warm and acidify; and
- Global mean sea levels will likely increase between 0.5m and 1m by 2100. Larger increases are unlikely but impossible to be ruled out due to uncertainties in ice-sheet processes.

These developments not only lead to extraordinary and unprecedented risks for the global environment, but can also have profound and disastrous consequences for human economies, societies, and health. The *Stern Review on the Economics of Climate Change*, which was already published in 2006, as well as the IPCC reports published since project the following consequences:[57]

- Melting glaciers will cause a steep increase in the average water level of some rivers. The availability of water will increase in some areas, while elsewhere drought and a lack of drinking water will occur.
- Around 44% of species in biodiversity hotspots are at high extinction risk and 24% are at a very high extinction risk due to climate change. Very high extinction risk in biodiversity hotspots due to climate change is more common for endemic species than other native species.[58]
- Climate change undermines food security. While the global food production will increase with local temperatures that increase between 1-2°C, it in turn will decrease as soon as the temperature increases further. Higher frequencies of periods of drought, floods, hurricanes, and heat waves will also affect the production of local crops; mainly in areas close to the equator that already produce little food.
- Coastal areas will be exposed to higher risks by the increasing sea level and coastal erosion. Not only coral reefs and *wetlands* are at risk, but also huge cities in developed and developing countries. Risks from sea level rise for coastal ecosystems and people are very likely to increase tenfold well before 2100 without adaptation and mitigation action as agreed by Parties to the Paris Agreement.[59]
- Around 4 billion people are exposed to water stress for at least one month a year globally. This covers half the world's population and is projected to increase to 60% by 2050.[60]
- Poor communities are even more vulnerable because their adaptability is limited and because they are more dependent for their livelihood on climate sensitive provisions such as local water and food supplies.[61]

Mitigation of climate change in the first place requires a rapid reduction in global GHG emissions. The 2015 Paris Agreement set the goal to limit global temperature increases to 2ºC, and preferably to 1.5 ºC.[62] During the COP26 in Glasgow in 2021, this goal was further sharpened to 1.5 ºC. This 1.5-degrees goal requires a reduction of global GHG emissions by 45% in 2030 and almost 100% by 2050.[63]

To reach these goals, much greater emission reduction efforts will be required than submitted by the countries in their Nationally Determined Contributions (NDC).[64] Recent calculations by Climate Action Tracker confirm that current NDCs would result in around 2.5°C of global warming in 2100.[65] If only a few countries would increase their reduction targets, this would already reduce the 1.5°C gap by 20-34%.[66] To win the battle against climate change, the most CO_2-intensive industries - energy, construction, food, heavy industry, and transport - have to change structurally.[67]

Meanwhile, companies in many industries will be confronted with climate change consequences and risks. Climate change itself creates *physical risks*, for instance because agricultural operations will suffer from drought, mines and power plants will lose access to sufficient water sources, air transport will be hampered significantly by storms, and factories and various forms of infrastructure will be destroyed by floods or hurricanes.

Separately, the different responses to climate change by consumers, markets, and governments (including new legislation on mitigating emissions), also create *transition risks*. Companies in different sectors need to grasp opportunities to develop new, carbon-free products, services, and production processes, requiring innovations. If companies are not able to live up to these challenges and reinvent their business models fast enough, they run the risk that their production facilities and other assets turn into stranded assets which can no longer be used for economic benefit in the changing regulatory and market circumstances.

Companies that produce, process, transport, or use fossil fuels in large volumes will certainly be required to change their *business model*. Research has indicated that up to eighty per cent of the world's coal reserves, thirty per cent of known oil reserves and fifty per cent of gas reserves can not be used for energy production anymore if the world is to stay below the goal of a maximum of 2°C of global warming, which does not even address the goal of limiting warming to 1.5°C.[68] Many in this sector put their hopes on projects for CO_2-storage and CO_2-removal from the atmosphere, but research shows that many of these types of projects do not lead to concrete greenhouse gas reductions and moreover may have negative consequences for other sustainability aspects.[69]

While the world is still struggling with the challenge to mitigate climate change, the topic of *adaptation* to climate change also deserves urgent attention. The Sendai Framework for Disaster Risk Reduction 2015-2030, adopted in March 2015, considers climate change as one of the drivers of disaster risk. Investing in disaster reduction for economic, social, cultural, and environmental resilience of persons, communities and countries and the environment, is one of the four top priorities. "Such measures are cost effective and instrumental to save lives and prevent and reduce losses", the United Nations report argues.[70]

To be able to adapt to the consequences of climate change, large scale investments are required, particularly in developing countries.[71] At the COP15 negotiations in Copenhagen in 2009, developed countries set a goal of mobilizing USD 100 billion in climate finance towards developing countries by 2020. This commitment was reiterated in the Paris Agreement in 2015 and collective mobilisation of climate finance from developed countries has increased to USD 71 billion in 2017.[72] Oxfam estimates between just USD 21to 24.5 billion as the "true value" of climate finance provided in 2020, against a reported figure of USD 68.3 billion in public finance that rich countries said was provided (alongside mobilized private finance, bringing the total to USD 83.3 billion).[73]

It will be vital to negotiate a finance package that recognises the true scale of the climate change challenge, while remaining responsive to the needs and specific circumstances in given countries. For example, for sub-Saharan Africa alone by 2050 an additional USD 60 billion is needed per annum for a 2°C-consistent international agreement on finance for climate change adaptation.[74] At COP27 in Sharm-el-Sheik in 2022, parties agreed to the creation of a new "loss and damage" fund for countries vulnerable to climate change.[75] The World Bank was invited to operationalise the fund as a financial intermediary fund (FIF) with its own independent governing bodies.[76]

According to conservative estimations by Eurodad and other civil society organisations, developing countries' climate finance needs are thought to be between USD 27 and USD 66 billion per year by 2030 for adaptation and USD 177 billion per year for mitigation. Global civil society organisations call upon financial institutions to play a major role in financing climate adaptation.[77]

After intense negotiations, a climate finance deal was struck at COP29 in Baku, Azerbaijan, in 2024. The agreement includes USD 300 billion to fund climate change initiatives in developing countries and a target of raising USD 1.3 trillion yearly by 2035. Many civil society organisations and climate advocates expressed their disappointment, particularly directed at richer countries.[78]

Integrating climate change in financial decision making has evolved from being seen as part of 'extra-financial criteria' or ESG-criteria to a potential major financial risk threatening the business models of companies, and financial stability in general. In 2015, the Financial Stability Board (FSB) created an industry-led Task Force on Climate-Related Financial Disclosures (TCFD) to identify which financial assets will lose value due to climate related risks and to "develop voluntary, consistent climate-related financial disclosures for use by companies in providing information to lenders, insurers, investors and other stakeholders".[79] In June 2017 the TCFD published its Recommendations of the Task Force on Climate-related Financial Disclosures.[80]

In July 2023, the FSB announced that the TCFD had fulfilled its remit and disbanded. The International Sustainability Standards Board (ISSB), established under the IFRS Foundation, will take over the monitoring responsibilities from 2024. The IFRS S1 and IFRS S2 fully incorporate the TCFD recommendations. The requirements in IFRS S2 are consistent with the four core recommendations and eleven recommended disclosures published by the TCFD.[81]

For financial institutions, the challenge is to deal with climate change risks in a proactive way, by measuring and reporting the carbon footprint of their financial portfolios and presenting strategies to make their portfolios consistent with the internationally agreed 1.5°C scenario. This also requires having a strategy for the transition to a low-carbon economy, including the switch from using fossil fuels to renewable energy sources. Besides encouraging companies in which they invest to measure, disclose, and reduce emissions, financial institutions should also phase-out investments in and financing of activities with high GHG emissions.

When developing policies in this respect, financial institutions can make use of the international standards described below.

2.2.3 International standards and initiatives

The main international standards on climate change are summarised per topic, followed by the assessment elements that are formulated by the FFGI Methodology as a result:

- **Setting measurable reduction objectives**

  Climate change is a global problem by nature and therefore requires an internationally coordinated set of answers. The world community has worked on this since the 1990s through several international conventions on climate change:

  - The 1992 UN Framework Convention on Climate Change (UNFCCC) formulates global objectives and principles and asks all member states to annually report their emission of greenhouse gases. Virtually all countries in the world take part in the UNFCCC, including the United States.
  - The 1997 Kyoto Protocol is based on the principles and objectives of the UNFCCC and establishes objectives and timelines for industrialised countries to limit their emissions. On

average, the Kyoto Protocol demanded an emission reduction (during the period 2008-2012) of 5.2% of the greenhouse gases in comparison to the level of 1990. Because of differences in levels of economic and social development, not all countries are expected to contribute to the same extent to this goal. Hence, Nationally Determined Contributions (NDCs) are agreed for all signatories of the protocol.
- The 2015 Paris Agreement is considered historic, since it brings 195 nations together in their aim to keep global temperature rise below 2°C, and preferably below 1,5°C, in 2100. The Paris Agreement also noted that the estimated aggregate greenhouse gas emission levels in 2025 and 2030 resulting from the intended Nationally Determined Contribution (NDC) plans of individual countries do not fall within 2˚C scenarios. The Paris Agreement therefore requires signatory countries therefore to submit updated NDCs every five years that are no less ambitious than existing ones.

Of specific importance for the financial sector is that the Paris Agreement, in Article 2, point 1, bullet c, states that it aims to strengthen the global response to climate change by, inter alia: "Making finance flows consistent with a pathway towards low greenhouse gas emissions and climate-resilient development".[82]

The Climate Action 100+ initiative is an investor initiative that seeks to pressure the largest corporate GHG emitters – accounting for two-thirds of annual global emissions – to take action on climate change.[83] As of December 2024, the focus list of companies included 168 companies with a market capitalisation of USD 10 trillion.[84] The initiative aims to encourage boards and senior management of major corporate GHG emitters to:[85]

- Implement a strong governance framework which clearly articulates the board's accountability and oversight of climate change risk and opportunities;
- Take action to reduce greenhouse gas emissions across their value chain, consistent with the Paris Agreement's goal of limiting global average temperature increase to well below 2 degrees Celsius above pre-industrial levels; and
- Provide enhanced corporate disclosure in line with the final recommendations of the Task Force on Climate-related Financial Disclosures (TCFD).

Investors working through the initiative are now engaged across 33 markets and represent over 50 percent of all global assets under management.[86] In March 2021, the initiative launched its Net-Zero Company Benchmark which assesses the performance of 159 companies against the initiative's three high-level goals: emissions reduction, governance, and disclosure. The fifth round of benchmark assessments released in October 2024, includes 165 companies.[87]

At the COP26 in Glasgow in 2021, the Glasgow Financial Alliance for Net-Zero (GFANZ) was formed. This is a coalition of large financial institutions initiated by the UN Race to Zero campaign "committed to accelerating the decarbonisation of the economy".[88] GFANZ has over 550 members from over 50 countries, and comprises seven sector-specific alliances of financial institutions:

- Net- Zero Asset Owner Alliance (AOA);
- Net-Zero Asset Managers Initiative (NZAM);
- Paris-Aligned Asset Owners (PAAO);
- Net-Zero Banking Alliance (NZBA);
- Net-Zero Insurance Alliance (NZIA);
- Net-Zero Financial Service Providers Alliance (NZFSPA); and
- Net-Zero Investment Consultants Initiative (NZICI).

GFANZ membership entails a commitment to the UN Race to Zero criteria, including:[89]

- "Using science-based guidelines to reach net-zero emissions across all emissions scopes by 2050;

- Setting 2030 interim targets that represent a fair share of the 50% decarbonization required by the end of the decade;
- Setting and executing on a net-zero transition plan
- Transparent reporting and accounting on progress against those targets
- Adhering to strict restrictions on the use of offsets".

This leads to assessment elements	
1	For its own direct and indirect greenhouse gas emissions, the financial institution establishes measurable reduction objectives that are aligned with limiting the maximum global temperature increase of 1.5°C.
4	For large scale project financing, the financial institution makes environmental impact assessments that include data on greenhouse gas emissions and climate risks.
5	For its financed and invested greenhouse gas emissions the financial institution establishes short, medium and long-term absolute reduction objectives that are aligned with limiting the maximum global temperature increase to 1.5°C.
6	The financial institution establishes sector-specific reduction targets for its financed emissions that are aligned with limiting the maximum global temperature increase to 1.5°C.
22	Companies disclose their scope 1, 2, and 3 greenhouse gas emissions.
23	Companies reduce their scope 1, 2, and 3 emissions in line with a 1.5-degree scenario.

- **Measuring and reporting greenhouse gas emissions**

  For setting ambitious and credible reduction objectives it is necessary to first measure and report on emissions. Globally, the standards of the Greenhouse Gas Protocol (GHG Protocol) are the most used standards to measure and manage greenhouse gas emissions. Amongst others the GHG Protocol has developed a standard for the emissions of products and the corporate value chain. The GHG Protocol is consistent with the IPCC guidelines for reporting CO_2-emissions.

  The Carbon Disclosure Project (CDP) is a coalition of institutional investors that asks the world's largest companies to release their annual emissions and other information on climate change. The CDP also acts as the Secretariat for the Climate Disclosure Standards Board (CDSB), established at the annual meeting of the World Economic Forum in 2007, as a response to the increased demand for standardised reporting guidelines for financial information related to climate change. Its Climate Change Reporting Framework was launched in September 2010 and last edited in 2022.

  In 2017 the Financial Stability Board's Task Force on Climate-Related Financial Disclosures (TCFD) published its recommendations for financial institutions and companies.[90] The recommendations provide a categorization of the financial impacts of climate-related risks and opportunities. The Task Force has also issued a guidance for the implementation of the recommendations, which include sector specific recommendations for the financial sector, as well as other sectors.[91]

  The TCFD includes four "widely adoptable recommendations tied to:

  - Governance: Disclose the organisation's governance around climate-related risks and opportunities;
  - Strategy: Disclose the actual and potential impacts of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning where such information is material;
  - Risk management: Disclose how the organisation identifies, assesses, and manages climate-related risks; and

- Metrics and targets: Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities where such information is material."[92]

The TCFD expects companies and financial institutions to disclose direct and indirect emissions and the related risks. In addition, banks "should describe significant concentrations of credit exposure to carbon-related assets. Additionally, banks should consider disclosing their climate-related risks (transition and physical) in their lending and other financial intermediary business activities".[93] Since 2024, the TCFD standards have been replace by the International Financial Reporting Standards (IFRS). The requirements in IFRS S2 are consistent with the four core recommendations and eleven recommended disclosures published by the TCFD.[94]

The European Commission published its own Guidelines on reporting climate-related information in 2019, as part of the EU 2030 Climate & Energy Framework.[95] These guidelines integrate the recommendations of the TCFD with the EU's guidance and policy on non-financial disclosure. Various countries have announced mandatory TCFD-aligned climate-related financial disclosures including New Zealand[96], Switzerland, the United Kingdom and China.[97] However, in all cases implementation will occur over several years.

Some financial institutions have developed initiatives to standardise and encourage the measurement of carbon footprints by banks and investors. The Platform Carbon Accounting Financials (PCAF) has published the Global GHG Accounting and Reporting Standard for the Financial Industry, a methodology for carbon accounting of mortgages, listed equity, project finance, commercial real estate, corporate debt, corporate loans (including SMEs) and government bonds.[98]

The PACTA methodology allows financial institutions to assess exposure to climate risks in their financing and enables them to compare their portfolios to the requirements of science-based transition pathways that are in line with a 2°C rise in global temperatures.

The Science Based Targets initiative (SBTi) is a collaboration between CDP, the United Nations Global Compact (UNGC), World Resources Institute (WRI), and the World Wide Fund for Nature (WWF). The initiative stimulates companies to develop emissions targets. Companies can submit a target for validation to SBTi, which is then tested against what climate science indicates is required to keep global temperature increase below 1.5 or 2°C.

This leads to assessment elements	
2	The financial institution discloses its financed emissions - meaning the absolute scope 1 and scope 2 GHG emissions associated with the companies in its lending and/or investment portfolio(s).
3	The financial institution discloses its financed emissions - meaning the absolute scope 1,2, and 3 emissions associated with the companies in its lending and/or investment portfolio(s) .
4	For large scale project financing, the financial institution makes environmental impact assessments that include data on greenhouse gas emissions and climate risks.
7	The financial institution measures and discloses climate-related impacts in line with IFRS S2 Climate-related Disclosures or the recommendations by the Task Force on Climate-related Financial Disclosures.
22	Companies disclose their scope 1, 2, and 3 greenhouse gas emissions.

- **Transition to a low-carbon economy**

The UN Environment Programme Emissions Gap Report 2024 emphasizes that global emissions must drop by 42 per cent by 2030 compared to 2019 levels, and 57 per cent by 2035 to be aligned with a 1.5°C scenario.[99] A rapid transition of the global energy sector is considered key to meeting these targets and requires at least:[100]

- Steeply accelerate the share of zero-carbon power in electricity generation;
- Phase out unabated coal and gas generation;
- Adapt grid/storage and demand management; and
- Ensure reliable energy access for all.

Already in 2017, the UNEP stressed that "between 80 and 90% of coal reserves worldwide will need to remain in the ground if climate targets are to be reached. This compares with approximately 35% for oil reserves and 50% for gas reserves”.[101] In addition, the UNEP Production Gap Report 2023 estimates that “Governments, in aggregate, still plan to produce around 110% more fossil fuels in 2030 than would be consistent with limiting warming to 1.5°C.

In May 2021, the International Energy Agency (IEA) released the long-awaited report Net-zero by 2050: A roadmap for the global energy sector, which describes a pathway towards a net zero CO_2 emissions in the energy sector by 2050. The report was updated in 2023 to address the changes in the landscape and the key developments since 2021. The IEA has reiterated the demand for no investments in new coal, oil and natural gas and also indicated that the NZE scenario can only be achieved with the early closure of some existing fossil fuel-based infrastructure. Among the essential measures described to reach net zero emissions by 2050: [102]

- An immediate end to new investments in fossil-fuel extraction and aiming to achieve net-zero electricity by 2040. This requires a phase out of all unabated coal-fired power plants and oil-fired power plants in advanced economies by 2030 and in all economies by 2040.
- Annual renewable electricity installations must triple by 2030. In IEA’s pathway to net zero, almost 90% of global electricity generation in 2050 comes from renewable sources. For solar power, it is equivalent to installing the world’s current largest solar park roughly every day. This also means that annual clean energy investment worldwide will need to be around USD 4.5 trillion a year by the early 2030s.
- Major innovation must take place in the coming decade as in 2050, almost 35 percent of the needed emissions reductions will come from technologies that are currently at the demonstration or prototype phase.

Apart from thermal coal, metallurgical coal which is used in the production of steel, must also be a focal point for the energy transition. The steel industry is responsible for 7 percent of global greenhouse gas (GHG) emissions and 11 percent of global carbon dioxide (CO2) emissions. This is largely due to the use of metallurgical coal, which constitutes about 14 percent of global coal production. Despite this urgent need to decarbonise the steel sector, metallurgical coal is rarely included in the policies of financial institutions. Reclaim Finance reports that out of 100 financial institutions assessed in its report, only five included metallurgical coal in their policies.[103]

The Global Coal Exit List published by Urgewald, is updated annually and “provides key statistics on over 1600 companies whose activities range from coal exploration and mining, coal trading and transport, to coal power generation and the manufacturing of coal plants”,[104] because “investments in new coal power capacity are incompatible with the Paris climate goals as each new coal plant locks-in high CO_2 emissions for decades to come”.[105]

The Global Oil and Gas Exit List (GOGEL) has been published annually since 2021 and provides a “company-level database with detailed information on companies operating in the upstream and/or midstream subsectors of the oil & gas industry”, covering over 900 companies responsible for more than 95% of global oil and gas production. GOGEL also includes data on oil and gas companies' expansion plans and the extent to which they overshoot the IEA Net Zero Emissions Pathway.

This leads to assessment elements	
8	Companies involved in the development of new thermal coal mines are excluded from investment and financing.
9	Companies involved in the development of new coal-fired power plants are excluded from investment and financing.
10	Companies involved in the development of new metallurgical coal mines and expansion of existing mines are excluded from investment and financing.
11	The financial institution excludes financing and investing in companies active in thermal coal mining for more than 20% of their activities
12	The financial institution excludes financing and investing in companies active in coal-fired power for more than 20% of their activities.
13	The financial institution excludes financing and investing in companies that produce more than 10 Mt of thermal coal per year and/or have more than 5 GW in coal power capacity.
14	The financial institution has a time-bound phase-out strategy for coal that is aligned with a 1.5-degrees climate scenario.
15	The financial institution fully excludes financing and investing in companies active in thermal coal mining and/or coal fired power generation.
16	Companies engaged in new oil and gas exploration and development are excluded from investment and financing.
17	The financial institution has a time-bound phase-out strategy for oil and gas that is aligned with a 1.5 degrees scenario.
18	Companies active in the extraction of oil from tar sands are excluded from investment and financing.
19	The financial institution excludes financing and investing in companies active in oil and gas extraction for more than 30% of their revenues.
20	The financial institution excludes financing and investing in companies active in oil and gas-fired power generation for more than 30% of their electricity generated.
21	The financial institution fully excludes financing and investing in companies active in oil and gas extraction and/or fossil fuel fired power generation.
23	Companies reduce their scope 1, 2, and 3 emissions in line with a 1.5-degree scenario.

- **Air pollution**

  Exposure to air pollutants, such as particulate matter (PM) emitted by diesel vehicles and coal-fired power plants, has serious adverse effects on human health. In 2019 alone, air pollution was estimated to have caused approximately 6.7 million deaths worldwide. Fine particles that can penetrate deep into the lungs pose a particularly significant risk. These increased health risks, such as respiratory infections, heart disease, stroke, and lung cancer, can disproportionately affect vulnerable people such as children, the elderly, and low-income communities.[106] Since the main air pollutants are also greenhouse gases, strict reporting on air pollutants is critical for combatting climate change and as well as reducing health impacts.

This leads to assessment elements	
24	Companies report emissions of air pollutants identified as having the largest impact on human health.

- **Deforestation and land use change**

Deforestation, drainage of peatlands and other land use change are significant contributors of greenhouse gas emissions, and at the same time destroy natural carbon sinks. Land use change can occur both directly and indirectly. Indirect land use change (ILUC) occurs when land previously used to grow food or feed is converted to grow another crop, thereby displacing agricultural production to other areas, leading to conversion of forests or natural grasslands to agricultural lands elsewhere. Agriculture, in particular, is among the biggest contributors to deforestation and land use change.

For more information and standards about deforestation and land use change, see the cross-cutting theme Biodiversity (section 2.1)

This leads to assessment elements	
25	Companies have a system in place to ensure that there is zero deforestation and forest degradation in their operations and supply chain.
26	Conversion of peatland and high-carbon stocks for agricultural development is unacceptable.

- **Biofuels**

Whether biofuels could be helpful in reducing greenhouse gas reduction emissions depends on the conditions under which the biomass used for biofuel production is grown. Biomass crops are often grown on agricultural land that was already used for growing food or feed, and are therefore often associated with ILUC (Indirect Land Use Change). ILUC is crucially important for assessing the sustainability impacts of the expansion of growing crops for biofuels. ILUC especially concerns first generation biofuels, as second- or third generation biofuels can also be made from waste of feedstock used for food or feed, and hence do not directly require cropland. Because of the ILUC problem, no real positive climate impact can be achieved through first-generation biofuels.[107]

Biofuel is often produced using palm oil, corn, sugar cane, and other food and feed crops. Biofuels based on food and feed crops threaten food security because of their impact on food availability, food prices and stability, and the social and environmental sustainability of food systems. Biofuels should be based on waste products and residues and follow cascading principles. Cascading means that natural resources should be used and recycled for as long as possible, and allocated to the most valuable purposes possible at each stage.[108] In their briefing for EU member states on bioenergy plans and policies, WWF recommends ending all subsidies and incentives that involve the dedicated use of land for biofuel or other energy crops, as this is unlikely to deliver climate benefits compared to growing food or feed or letting the same land return to natural vegetation.[109] Other organisations have recommended ending the use of all crop-based biofuels by 2030 at the latest.[110] The European Court of Auditors has also recognised sustainability concerns related to crop-based biofuels including the over-estimations of GHG emissions reductions.[111]

The European Parliament intends to reduce the CO_2 emissions of the cultivation for biofuels. Moreover, Directive EU 2015/1513 and the 2018 Renewable Energy Directive (RED) have introduced measures to reduce the risk of ILUC, including phasing out the use of unsustainable palm oil as a basis for biofuels. The revised Renewable Energy Directive (EU/2023/2413) indicates an 18-month period to transpose most of its provisions into national law.

This leads to assessment element	
27	Companies involved in 1) food- and feed-based biofuels OR 2) food- and feed-based power generation are excluded from investment and financing.

- **Lobbying practices**

  Effective government policies are crucial for the transition towards a decarbonised global economy, for instance by accelerating the development and deployment of renewable energy, setting a price for carbon and adopting more stringent pollution regulations. The adoption and implementation of effective climate policies by governments have however long been hampered by lobbying efforts from large polluting industries, such as the oil and gas industry, the mining sector, and steel and chemicals producers. These efforts have slowed down the climate efforts of governments worldwide.

  Influence Map tracks corporate lobbying efforts in various industries on climate change and methane regulations, and publishes the Corporate Climate Policy Footprint, an annual list of the 25 most influential companies blocking climate policy action. In 2019, Influence Map estimated that in the three years following the Paris Agreement, the five largest publicly traded oil and gas majors (ExxonMobil, Royal Dutch Shell, Chevron, BP and Total) had invested over USD 1 billion of shareholder funds on misleading climate-related branding and lobbying.[112]

  In its Guidelines for Multinational Enterprises, the Organisation for Economic Co-operation and Development (OECD) recommends that "in general, enterprises avoid making efforts to secure exemptions not contemplated in the statutory or regulatory framework related to human rights, environmental, health, safety, labour, taxation, and financial incentives among other issues, without infringing on an enterprise's right to seek changes in the statutory or regulatory framework".[113]

  In 2022, several investors and investor networks including AP7, BNP Paribas Asset Management, PRI, the Institutional Investors Group on Climate Change (IIGCC) and the Asia Investor Group on Climate Change published the Global Standard on Responsible Corporate Climate Lobbying, setting expectations for investee companies for aligning their lobbying efforts with the goals of the Paris Agreement.

  There is growing evidence that foreign investors are exploiting the opaque international arbitration process called Investor-State dispute settlement (ISDS). Companies use ISDS claims to challenge climate and environmental action by States and demand exorbitant compensation. Stronger environmental laws and regulations, such as phasing out of coal-fired power plants and fracking bans, are examples of measures vulnerable to the threat of ISDS claims. The skyrocketing ISDS claims and threats of such claims are largely led by fossil fuel, mining, and other extractive industries. The UN Trade & Development organisation has published an online tool, the Investment Dispute Settlement Navigator, that discloses details about all publicly known treaty-based ISDS claims.[114]

This leads to assessment elements	
28	Companies do not participate in direct or indirect lobbying (attempting to influence decisions made by regulators) aimed at weakening climate policies.
29	Companies disclose all ISDS claims they have filed against governments, including the objective of the ISDS claim and an explanation about how the ISDS claim relates to their climate policies

- **Procurement and supply chains**

  Companies are often part of long procurement and supply chains. This offers companies that are linked together in these chains the opportunity to monitor one another and to question how their trading partners respect local and national legislation and international norms on climate change. The requirements that companies set for their suppliers can be included in contractual agreements.

  The importance of this is also recognised in the OECD Guidelines for Multinational Enterprises. The OECD Due Diligence Guidance for Responsible Business Conduct provides practical support to companies on the implementation of the OECD Guidelines for Multinational Enterprises by providing plain language explanations of its due diligence recommendations. Implementing these recommendations can help companies avoid and address adverse impacts that may be associated with their operations, supply chains and other business relationships.

Also ISO 26000:2010 Guidance on social responsibility recognises the importance of supply chain responsibility, because “the impacts of an organisation's decisions or activities can be greatly affected by its relationships with other organisations”.[115] A company’s sphere of influence includes relationships within and beyond an organisation’s supply chain. Moreover, ISO 26000:2010 Guidance on social responsibility recommends setting contractual provisions or incentives as a means of exercising influence.[116]

In addition, ISO 20400:2017 Sustainable procurement – Guidance provides guidelines for organisations, independent of their activity or size, on integrating sustainability within procurement, as described in ISO 26000:2010 Guidance on social responsibility. This procurement guideline is intended for stakeholders involved in, or impacted by, procurement decisions and processes.

The Climate Action 100+ investor initiative seeks to encourage companies to “take action to reduce greenhouse gas emissions across their value chain, consistent with the Paris Agreement’s goal of limiting global average temperature increase to well below 2 degrees Celsius above pre-industrial levels”.[117]

This leads to assessment elements	
30	Companies integrate climate change criteria in their procurement and operational policies.
31	Companies include clauses on the compliance with criteria on climate change in their contracts with subcontractors and suppliers.

2.3 Corruption

2.3.1 Assessment elements

For financial institutions, the issue of corruption is relevant in two ways. Firstly, international financial institutions are multinational corporations themselves and therefore can be expected to have a policy to prevent them from paying or receiving bribes, or becoming involved in any other corruption practice. Secondly, the possible involvement in corruption practices is an issue on which financial institutions should assess all companies they invest in or finance, even if the financial institution does not actively facilitate the corrupt payments made by the company.

The following elements are crucial for a policy regarding the financial institution's internal operations:

1. Offering, promising, giving and requiring, either directly or indirectly, bribes and other undue advantages in order to acquire and to maintain assignments and other undue advantages, is unacceptable.
2. The financial institution has an anti-money laundering policy.
3. The financial institution has a policy to prevent terrorist financing and financing of proliferation.
4. The financial institution properly verifies the ultimate beneficial owner(s) of a company.
5. The financial institution reports on its participation in the decision-making processes of international norms and legislation (lobby practices).
6. The financial institution has a policy against making political contributions.

The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:

7. Companies publicly disclose their ultimate beneficial owner or owners including full name, date of birth, nationality, jurisdiction of residence, number, and categories of shares, and if applicable the proportion of shareholding or control.
8. Offering, promising, giving and requiring, either directly or indirectly, bribes and other undue advantages in order to acquire and to maintain assignments and other undue advantages, is unacceptable.
9. Companies report on their participation in the decision-making processes of international norms and legislation (lobby practices).
10. Companies integrate criteria on corruption in their procurement policies and operational policies.
11. Companies include clauses on the compliance with criteria on corruption in their contracts with subcontractors and suppliers.

2.3.2 What is at stake?

Corruption has significant negative political, social, and environmental consequences. Politically, corruption forms a large obstacle to developing the rule of law. Government representatives lose their legitimacy when many abuse their office for personal gain. Bribery and corruption undermine the trust of the people in the political system, which leads to frustration and apathy. It clears the way for leaders, whether chosen democratically or not, to appropriate national assets for themselves without supervision. And if corruption is the norm, honest and capable citizens will leave the country.[118]

The Transparency International (TI) Corruption Perceptions Index suggests that corruption is more prevalent in poorer countries.[119] In many countries, the tax system suffers from corrupt practices. Corruption lowers tax revenues and limits governments' ability to meet their obligations.[120]

Corruption also has negative economic consequences. It leads to capital flight and to expenditure of scarce public funds on unprofitable prestige projects, instead of necessary investments in vital infrastructure and services like schools, hospitals or drinking water supplies. It also hinders the development of markets and disturbs free competition. In addition, corruption leads to large scale plundering of natural resources, such as wood, gemstones, and minerals. Large scale, strongly polluting projects are given free rein in a climate of corruption, often leading to public money ending up in private hands.[121]

However, corruption is not limited to poorer countries only. In a 2022 briefing, the European Parliamentary Research Service states that *"Corruption is a major challenge for the European Union (EU), with all its Member States affected by the problem to some extent."*[122] Furthermore, in many corruption cases in developing countries, financial institutions from developed countries play a key facilitating role.

Lobbying practices can have similar effects as corruption. Although lobbying as such cannot be regarded as corruption per se, sometimes lobbyists will go so far in striving to influence legislators and regulators, for instance by treating them to sponsored conferences or other events, that it can almost be considered corruption. The influence of the corporate world on the development of international norms is often large and is an important reason for lagging legislative progress.[123] Over 1700 fossil fuel lobbyists were granted access to the recent COP 29, outnumbering the delegations of almost every country at the conference. Around 100 senior executives from oil and gas companies were invited as 'guests of the presidency'.

Policy measures to prevent corruption are often stronger than those to avoid unwanted lobbying practices. On the one hand, public institutions have formulated clear rules for their employees to which they must comply in order to prevent bribery and unwanted influence of particular interests in public activities. On the other hand, the participation of social and commercial organisations in the decision-making process is far from transparent. Canada, the United States and the European Union have over time adopted measures to improve the transparency of lobbying practices. Canada and the United States have for instance created mandatory registers for organisations wishing to participate in decision-making processes. In the European Union, a voluntary register has been created.

Corruption is covered by Sustainable Development Goal (SDG) 16: Peace, Justice and Strong Institutions. One of the targets of this goal is to substantially reduce corruption and bribery in all their forms. Another target is to develop effective, accountable, and transparent institutions at all levels, which also underpins the importance of corruption-free institutions.[124] Further, SDG 10: Reduced Inequalities is based on the premises of reducing corruption for increasing equality amongst people and countries.[125]

Money laundering is the practice of making illegally gained sums and flows of money appear legal, and of a wide variety of strategies to conceal the true source of the money. This is obviously problematic since it enables individuals and organisations that have not obtained their money through legal means to participate in the wider economy through regular channels.

One can expect from responsibly operating financial institutions that they do not deliberately assist clients in money laundering and paying or receiving bribes, and that they do not accept or pay bribes themselves. Moreover, financial institutions have the responsibility to only grant financial services to companies that do not engage in corruption and negatively influencing the development of international norms. When developing policies on corruption, financial institutions can make use of the international standards described below.

2.3.3 International standards and initiatives

The main international standards on corruption are summarised per topic, followed by the assessment elements that are formulated by the FFGI Methodology as a result:

- **Anti-money laundering and beneficial ownership**

  The international standard in the field of money laundering is set by the Financial Action Task Force (FATF), a working group established by the OECD in 1989. The FATF comprises 37 members, mostly governments of OECD-member states. The FATF aims to promote the successful implementation of legal, regulatory, and operational procedures for combating money laundering, the financing of terrorists and other associated threats to the integrity of the international financial system.

  The FATF has developed a set of Forty Recommendations, first published in 1990, that are considered to be the international standards for the combating of money laundering. These recommendations offer guidelines and tools to governments and financial institutions to fight money laundering and criminal earnings at all levels. The FATF has also published several Interpretative Notes, which provide guidance on the application of the guidelines in practice.

  Recommendation 12 deals with *Politically Exposed Persons (PEPs)* and their relatives. When dealing with PEPs, financial institutions are required to have enhanced due diligence and risk-management systems in place.

  The Forty Recommendations, last updated in 2023, have been adopted by numerous international institutions, such as the World Bank and the International Monetary Fund (IMF), as well as the governments of many countries. In May 2015, the European Union included the Forty Recommendations in the Fourth AMLD (EU Directive 2015/849). Efforts to confiscate criminal assets were remarked as insufficient compared to the volume of criminal assets flowing through global financial systems. Thus, the latest update made asset recovery a strategic priority. Effective asset recovery removes the financial incentive for criminal activity, limits the capacity of organised criminal groups and terrorists to threaten safety and security, and, importantly, enables assets to be returned to victims of crime, including nations harmed by corruption and tax offences.[126]

  In December 2014 the European Parliament and Council agreed on listing the ultimate owners of companies in central public registers. In May 2018 the EU's Fifth Anti-Money Laundering Directive (AMLD) was adopted, further strengthening the measures laid out in the earlier EU anti-money laundering directives. Any company and trust registered in an EU member state is now required to provide information about its "beneficial owner" including: name, month and year of birth, nationality, country of residence and as well as the nature and extent of the beneficial interest held. In May 2024, the EU Council adopted a package of new anti-money laundering rules including the Sixth Anti-Money Laundering Directive and the creation of a new European Authority for Anti-Money Laundering and Countering the Financing of Terrorism (AMLA).[127]

  The World Bank's Stolen Asset Recovery Initiative has developed a guidance on how to prevent corruption via the hiding of stolen assets. The report examines the links between large-scale corruption by high-level public officials and the concealment of stolen assets through opaque shell companies, foundations, and trusts. The initiative urges all financial institutions to collect beneficial ownership information about the company and continue to monitor whether this information is accurate.[128]

  The Wolfsberg Group, a group of 13 international banks that undertake many activities in the field of *private banking* (banking for rich private clients), published a revised edition of the Wolfsberg Anti-Money Laundering Principles on Private Banking in 2012. In these principles, the Forty Recommendations are further elaborated on asset management and private banking.

In addition, the Wolfsberg Group has also published various other principles in the field of money laundering, financing of terrorism and corruption.

This leads to assessment elements	
2	The financial institution has an anti-money laundering policy.
3	The financial institution has a policy to prevent terrorist financing and financing of proliferation.
4	The financial institution properly verifies the ultimate beneficial owner(s) of a company.
6	The financial institution has a policy against making political contributions.
7	Companies publicly disclose their ultimate beneficial owner or owners including full name, date of birth, nationality, jurisdiction of residence, number and categories of shares, and if applicable the proportion of shareholding or control.

- **Corruption and bribery**

  The 2004 UN Convention against Corruption (UNCAC) contains minimum standards in order to prevent corruption as well as money laundering. It explains what states would have to do to prevent, and bring to trial, corruption and money laundering and provides recommendations on international cooperation and recovery of capital. As of 7 August 2024, the convention has been signed by 191 state parties.[129] In 2011, these nations agreed to establish a Mechanism for the Review of Implementation of the UNCAC.

  The main international standard with respect to fighting international corruption is the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, which came into force in February 1999. The convention obliges countries to make paying bribes to foreign public officials a criminal offence. As of January 2023, all OECD member countries and eight other countries have ratified the convention, which obliges them to implement this convention in their national legislation.[130]

  The 2023 OECD Guidelines for Multinational Enterprises state: “Enterprises should not, directly or indirectly, offer, promise, give, or demand a bribe or other undue advantage to obtain or retain business or other improper advantage.” This is further elaborated in seven detailed guidelines.

  In 2013 Transparency International published the Business Principles for Countering Bribery, a framework that can help companies to draft an effective anti-corruption policy. The report stresses the importance of implementing principles and policies in anti-bribery programmes. Although a lot of large companies have an anti-corruption policy, the implementation often leaves much to be desired and in practice bribes are still regularly being paid.[131] In addition, Transparency International published an edition of the business principles specifically for small and medium enterprises (SMEs). To help companies with the implementation of their anti-corruption policy, TI provides the Corruption Fighters’ Tool Kit.

  The 2023 Wolfsberg Anti-Bribery and Corruption Guidance, a revised, extended and renamed version of the Wolfsberg Statement against Corruption, includes measures with which financial institutions can prevent corruption in their own organisation and protect themselves against abuse of their institutions for corruption practices.

This leads to assessment elements	
1	Offering, promising, giving and requiring, either directly or indirectly, bribes and other undue advantages in order to acquire and to maintain assignments and other undue advantages, is unacceptable.
8	Offering, promising, giving and requiring, either directly or indirectly, bribes and other undue advantages in order to acquire and to maintain assignments and other undue advantages, is unacceptable.

- **Lobbying practices**

  Non-transparent lobbying practices can have similar effects as corruption. Various national and regional initiatives try to provide insight into the interests of organisations within legislation processes. The European Commission has drafted a voluntary register for interest representatives in 2008 within the framework of the European Transparency Initiative. It aims to inform the public which general or specific interests groups influence the decision-making process of the European institutions and what budget they have. Organisations that register can make clear that they work in a transparent and legitimate way. By registering, they promise to comply with the Transparency Register Code of Conduct. Because the register is voluntary, social organisations call upon the European Commission to adopt the example set by the United States and Canada, where registration is obligatory.

This leads to assessment elements	
5	The financial institution reports on its participation in the decision-making processes of international norms and legislation (lobby practices).
9	Companies report on their participation in the decision-making processes of international norms and legislation (lobby practices).

- **Procurement and supply chains**

  Companies are often part of long procurement and supply chains. They can monitor one another and question how they respect local and national legislation and international norms on tax and corruption. The requirements that companies set for their suppliers can be included in contractual agreements.

  The importance of this is also recognised in the OECD Guidelines for Multinational Enterprises. The OECD Due Diligence Guidance for Responsible Business Conduct provides practical support to companies on the implementation of the OECD Guidelines for Multinational Enterprises by providing plain language explanations of its due diligence recommendations. Implementing these recommendations can help companies avoid and address adverse impacts that may be associated with their operations, supply chains and other business relationships.

  Also ISO 26000:2010 Guidance on social responsibility recognises the importance of supply chain responsibility, because “the impacts of an organisation's decisions or activities can be greatly affected by its relationships with other organisations”.[132] A company’s sphere of influence includes relationships within and beyond an organisation’s supply chain. Moreover, the ISO 26000 Guidance recommends setting contractual provisions or incentives as a means of exercising influence.[133]

  In addition, ISO 20400:2017 Sustainable procurement – Guidance provides guidelines for organisations, independent of their activity or size, on integrating sustainability within procurement practices, as described in ISO 26000:2010 Guidance on social responsibility. It is intended for stakeholders involved in, or impacted by, procurement decisions and processes.

This leads to assessment elements	
10	Companies integrate criteria on corruption in their procurement policies and operational policies.
11	Companies include clauses on the compliance with criteria on corruption in their contracts with subcontractors and suppliers.

2.4 Gender equality

2.4.1 Assessment elements

The following elements are crucial for a policy regarding the financial institution's internal operations:

1. The financial institution has made a public commitment to gender equality. It has a stand-alone gender strategy or has incorporated gender equality and women's empowerment into its business strategy.
2. The financial institution provides trainings to address gender-based discrimination and biases in the workplace.
3. The financial institution actively manages equal remuneration.
4. The financial institution has systems in place to prevent and mitigate gender discrimination of its customers.
5. The financial institution guarantees 40-60% participation and equal access for women on the Board of Directors, Executive positions, and Senior management level.
6. The financial institution provides targeted professional development for employees to promote equal access for women to senior level positions.
7. The financial institution demonstrates its commitment to family life and work-life balance by supporting childcare, parental leave, and other care responsibilities (e.g., breastfeeding, dependent care).

The following element is related to the financial institution's transparency and strategy:

8. The financial institution discloses the % of financing to women-owned businesses OR other vulnerable groups, on the total amount of financing to MSMEs.

The following elements are crucial for a policy regarding companies a financial institution invests in or finances:

9. Companies have made a public commitment to gender equality. It has a stand-alone gender strategy or has incorporated gender equality and women's empowerment into its business strategy.
10. Companies provide trainings to address gender-based discrimination and biases in the workplace.
11. Companies actively manage equal remuneration.
12. Companies have systems in place to prevent and mitigate gender discrimination of their customers.
13. Companies guarantee 40-60% participation and equal access for women on the Board of Directors, Executive positions, and Senior management level.
14. Companies provide targeted professional development, and where necessary also education and training, for employees to promote equal access for women to senior level positions.
15. Companies include gender and women's rights criteria in their procurement and operational policies.
16. Companies include clauses on the compliance with gender and women's rights criteria in their contracts with subcontractors and suppliers.

2.4.2 What is at stake?

Gender refers to socially constructed identities, attributes and roles for individuals.[134] In short, gender determines what is expected, allowed and valued in a person in a given context. Gender equality refers to the equal rights, responsibilities and opportunities of every individual.[135] Equality requires that the rights, responsibilities and opportunities accorded to any individual do not depend on the sex assigned at birth.

While gender inequalities also affect men, non-binary and transgender people, and can also be viewed through the lens of sexual orientation, this chapter focuses on gender inequalities in relation to women. The gendered construction of women's identities, attributes and roles in society has historically produced an imbalance of power between men and women. To offer some examples:

- Poverty rates are higher for women than for men, particularly when it comes to female-headed households;[136]
- Women have less access to formal financial systems: Globally, a gender gap of 4 percentage points exists (78 percent of men and 74 percent of women have a bank account) in 2021, while developing economies have a wider average gap, 6 percentage points. In 2021, 74 percent of men but only 68 percent of women in developing economies had a bank account.[137]
- Legal rights of women remain unequal compared to the rights of men in most countries: a 2024 World Bank study concluded that women have about two-thirds of the rights of men and that in none of the 190 economies assessed, women have the same legal rights as men in all of the indicators measured.[138]
- Despite the notable progress in women's increased access to resources (earned income and asset ownership), those who live with a male partner still contribute less than half of the family income and accumulate an even smaller share of the wealth. The distribution of unpaid care work also remains very unequal, with women doing three times the amount of unpaid care as men;[139]
- Gender-based violence affects 30 percent of women globally, according to the World Health Organisation (WHO).[140] Moreover, in the majority of countries, less than 40 percent of the women who experience violence seek help, with less than 10 percent of those seeking help from formal institutions.[141]

Women remain a minority among senior managers in the private sector: a 2021 Equileap study of over 3,702 companies found that only 10 companies globally achieved gender balance at all levels: board, executive, senior management, and workforce.[142] Companies can impact the entire range of gender issues and have an enormous impact on people's lives and the communities in which they operate. For example, the fact that 740 million women still remain unbanked creates difficulties in collecting and saving income, makes them more vulnerable to economic and social exclusion and challenges the effective enjoyment of their economic, social and cultural rights.[143] Moreover, the highly visible inequality between women and men in leadership and decision-making positions both in public and private institutions, may infringe the right to equal access to public services and the right to equality and non-discrimination. These situations also serve to illustrate how business activities may create or exacerbate gender inequalities.[144]

The impacts that businesses have on gender equality have largely been documented by civil society organisations (CSOs).[145] The Gender, Business and Human Rights Reference Group for the Office of the High Commissioner on Human Rights (OHCHR) emphasizes that an ostensibly gender-neutral approach to policymaking renders invisible important gender issues, and marginalizes women's experiences.[146] Many CSOs and research agencies therefore suggest adopting a gender mainstreaming approach.[147]

Gender mainstreaming refers to the process of assessing the implications for women and men of any planned action, including legislation, policies, or programmes, in all areas and at all levels.[148] This is a strategy for making women's as well as men's concerns and experiences an integral dimension of the design, implementation, monitoring and evaluation of policies and programmes.

If, for example, a community is resettled as a result of a large-scale infrastructure project, a gender mainstreaming approach would require companies to consider whether such resettlement may have different, disproportionate or unforeseen impacts on women and men, including familial responsibilities, economic opportunities and childcare.

Gender equality is addressed in many of the Sustainable Development Goals (SDGs). SDG: 5 on Gender Equality focuses on improving gender balance in countries. The targets under this goal include eliminating all forms of gender discrimination, violence, sexual exploitation, early marriages, improving equal rights to economic resources, and strengthening legislation to promote gender equality and empowerment of women.[149] SDG: 10 on Reduced Inequalities also aims to empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status by 2030.[150]

SDG: 1 on No Poverty focuses on eradicating poverty. One of the targets is to ensure that all men and women have equal rights to economic resources, as well as access to basic services, ownership and control over land and other forms of property, inheritance, natural resources, appropriate new technology and financial services, including microfinance by 2030. Another target is to create sound policy frameworks at the national, regional, and international levels, based on pro-poor and gender-sensitive development strategies.[151]

SDG: 4 on Quality Education, focusing on ensuring good education to every child, also includes a gender approach: "By 2030, eliminate gender disparities in education and ensure equal access to all levels of education and vocational training for the vulnerable, including persons with disabilities, indigenous peoples and children in vulnerable situations."[152] SDG: 8 on Decent Work and Economic Growth includes a target to achieve decent work for all men and women with equal pay for work of equal value by 2030.[153]

Due to its significant role in the global economy, the financial sector is being called by international organizations, governments, and civil society to accelerate gender equality and responsible business conduct, both in its internal and external operations. In their internal operations, banks have the responsibility to respect the rights of women, such as by putting in place non-discrimination and sexual harassment policies. They are also required to do more to promote women into leadership positions and to eliminate the gender pay gap. In their business relationships with clients and investees, banks are expected to integrate a gender lens in their responsible business conduct due diligence. This starts by identifying potential or actual adverse gendered impacts associated with the activities of their clients and investees and their supply chains, and then taking steps to cease, prevent and mitigate them.[154] Organisations such as Equileap has been publishing regular reports measuring gender equality in the private sector across emerging and developed markets.[155]

Gender equality relates to the other cross-cutting themes in the FFGI Methodology not only because of the inherent gender-based human rights risks associated with environmental, social and governance issues. A number of studies have pointed out that increased board diversity in companies is associated with better performance on corporate sustainability and social responsibility indicators.[156] Hence, promoting gender equality in companies and financial institutions' operations provides the potential for indirectly advancing positive change throughout the different sectors and themes analysed in the FFGI Methodology.

As shown in section 2.4.3, a large number of international standards exist which could help companies – including financial institutions – to promote gender equality. The policies of financial institutions, both as a direct employer and as an influencer of the companies they are financing or investing in, can have a great impact on achieving gender equality.

2.4.3 International standards and initiatives

Equality between women and men has been widely recognized in specific human rights and sustainability standards. The main international standards on gender are summarised below, followed by the assessment elements that are formulated by the FFGI Methodology as a result:

- **United Nations Charter, the Universal Declaration of Human Rights and the International Bill of Rights**

  Gender equality is at the very heart of human rights and United Nations values.[157] The United Nations Charter was adopted in 1945 and establishes as a fundamental principle the "equal rights of men and women".[158]

  Moreover, the 1948 United Nations' Universal Declaration of Human Rights formulates the right to equality and non-discrimination: "Everyone is entitled to all the rights and freedoms set forth in this Declaration, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status".[159] The right to equality and non-discrimination is also recognized in the United Nations' International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.

This leads to assessment elements	
1	The financial institution has made a public commitment to gender equality. It has a stand-alone gender strategy or has incorporated gender equality and women's empowerment into its business strategy.
9	Companies have made a public commitment to gender equality. It has a stand-alone gender strategy or has incorporated gender equality and women's empowerment into its business strategy.

- **Convention on the Elimination of all forms of Discrimination against Women**

  The Convention on the Elimination of all forms of Discrimination against Women (CEDAW) is the main international treaty for women's rights. Adopted by the United Nations in 1979, it defines what constitutes discrimination against women and sets up an agenda for national action to end such discrimination.[160]

  CEDAW provides the legal basis for developing international legal regulation on women, business and human rights when imposing the obligations to prevent violations by private individuals and actors:

  - According to the Committee on the Elimination of all forms of Discrimination against Women (CEDAW) state parties must "protect women from discrimination by private actors".[161] In that sense, state parties must "react actively against discrimination against women, regardless of whether such acts or omissions are perpetrated by the State or by private actors."[162]
  - In addition, state parties must "formulate and implement a policy that is targeted as clearly as possible towards the goal of fully eliminating all forms of discrimination against women and achieving women's substantive equality with men."[163] The policy "must be comprehensive" and "apply to both public and private economic spheres".[164] Moreover, this "policy must engage the private sector, including business enterprises, the media, organisations, community groups and individuals, and enlist their involvement in adopting measures that will fulfil the goals of the Convention in the private economic sphere".[165]
  - Finally, "the full implementation of the Convention requires States to take positive measures to eliminate all forms of violence against women".[166]

  Although the state party is ultimately responsible for carrying out the obligations under CEDAW, non-state actors, including business entities, play a critical role in ensuring that women enjoy their rights to non-discrimination and substantive equality. For example, in the concluding observations, CEDAW has made recommendations directly to the media and health care providers.[167]

This leads to assessment elements	
1	The financial institution has made a public commitment to gender equality. It has a stand-alone gender strategy or has incorporated gender equality and women's empowerment into its business strategy.
2	The financial institution provides trainings to address gender-based discrimination and biases in the workplace
9	Companies have made a public commitment to gender equality. It has a stand-alone gender strategy or has incorporated gender equality and women's empowerment into its business strategy.
10	Companies provide trainings to address gender-based discrimination and biases in the workplace.

- **International Labour Organisation conventions**

  Gender equality is a main element for the International Labour Organisation (ILO) in reaching its primary goal of promoting opportunities for women and men to obtain decent work.[168] This is reflected in relevant international labour standards, but also in the increasing research focus of the ILO on gender equality.[169] The five key ILO gender equality Conventions are the following:

  - The 1951 Equal Remuneration Convention (No. 100);
  - The 1958 Discrimination (Employment and Occupation) Convention (No. 111);
  - The 1981 Workers with Family Responsibilities Convention (No. 156);
  - The 2000 Maternity Protection Convention (No. 183); and
  - The 2019 Violence and Harassment Convention (No. 190).

  Conventions 100 and 111 are also among the ILO Declaration on Fundamental Principles and Rights at Work, making clear that equality and non-discrimination are also at the very heart of the ILO.

  In addition, the ILO has specifically addressed multinationals and the private sector in its Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy (MNE Declaration). The MNE Declaration contains two relevant references to gender equality that are aligned with ILO Conventions 100 and 111. These are the following:

  - Multinational enterprises should be guided by the principle of "equality of opportunity and treatment" throughout their operations.[170]
  - Multinational enterprises should base hiring procedures on qualifications, skills, and experience, and offer staff training on all levels and to avoid discrimination of employees (based on ethnicity, gender, or social background).[171]

This leads to assessment elements	
1	The financial institution has made a public commitment to gender equality. It has a stand-alone gender strategy or has incorporated gender equality and women's empowerment into its business strategy.
3	The financial institution actively manages equal remuneration.
4	The financial institution has systems in place to prevent and mitigate gender discrimination of its customers.
9	Companies have made a public commitment to gender equality. It has a stand-alone gender strategy or has incorporated gender equality and women's empowerment into its business strategy.
11	Companies actively manage equal remuneration

- **United Nations Guiding Principles on Business and Human Rights**

  The United Nations Guiding Principles on Business and Human Rights (UNGPs) mention the principle of non-discrimination and the unique risks women and men face in the context of business activities:

  - The preamble reads: "These Guiding Principles should be implemented in a non-discriminatory manner, (…) and with due regard to the different risks that may be faced by women and men".[172]
  - In addition, when conducting human rights due diligence "business enterprises should pay special attention to any particular human rights impacts on individuals from groups or populations that may be at heightened risk of vulnerability or marginalization, and bear in mind the different risks that may be faced by women and men".[173]

  The Gender, Business and Human Rights Reference Group has elaborated how to integrate a gender perspective into the business responsibility to respect human rights.[174] Its main recommendations are the following:[175]

  - Include gender mainstreaming within policies and procedures;
  - Collect and analyse sex-disaggregated data for assessing and addressing human rights impacts;

  The UN Working Group on the issue of human rights and transnational corporations and other business enterprises has published gender guidelines for the UN Guiding Principles, which include gender-specific guidance for states and business enterprises for each of the Guiding Principles. Drawing on the principle on non-discrimination and the need for special attention to the human rights risks faced by women, the report provides guidance on how to include a gender framework in the implementation of the Guiding Principles. In line with the UNGPs' emphasis on the three elements of policy, due diligence, and remedy (see section 2.5), the report suggests that addressing gender through the UNGPs requires:[176]

  - Gender-responsive assessment, capable of responding to "differentiated, intersectional and disproportionate adverse impacts on women's human rights";
  - Gender-transformative measures, capable of "bringing change to patriarchal norms and unequal power relations that underpin discrimination, gender-based violence and gender stereotyping"; and
  - Gender-transformative remedies, similarly capable of mitigating and altering discriminatory and unequal power relations.

  This provides an opportunity to further elaborate the meaning of the UNGPs for women's rights issues in the context of business and how they can be applied.

This leads to assessment elements	
8	The financial institution discloses the % of financing to women-owned businesses OR other vulnerable groups, on the total amount of financing to MSMEs.

- **Beijing Declaration and Platform for Action**

  The Beijing Declaration and Platform for Action was produced after the 1995 United Nations' Fourth World Conference on Women. The Beijing Declaration contains a standard for gender balance in decision-making positions. According to the Beijing Declaration, "removing all the obstacles to women's active participation in all spheres of public and private life through a full and equal share in economic, social, cultural and political decision-making", is fundamental for the achievement of gender equality.[177] In that regard, the Beijing Declaration calls on governments and the private sector to "take measures to ensure women's equal access to and full participation in power structures and decision-making".[178]

This objective has been operationalized by, among other indicators, requiring gender quotas for senior-level positions and corporate boards. In December 2022, a new EU Directive EU2022/2381 came into force to improve the gender balance in corporate decision-making bodies. Large listed EU companies that do not meet the target of 40 % among non-executive board members or 33% among all directors of the under-represented sex by 30 June 2026 have to ensure fair and transparent selection procedures for the selection of candidates for board positions. The directive also allows flexibility for Member States that have adopted equally effective measures.[179]

This leads to assessment elements	
5	The financial institution guarantees at least 40-60% participation and equal access for women on the Board of Directors, Executive positions, and senior management level.
13	Companies guarantee at least 40-60% participation and equal access for women on the Board of Directors, Executive positions, and Senior management level.

- **OECD Guidelines for Multinational Enterprises**

  The OECD Guidelines for Multinational Enterprises also contain relevant standards for responsible enterprise behaviour on gender equality:

  - Enterprises are expected to "promote equal opportunities for women and men with special emphasis on equal criteria for selection, remuneration, and promotion, and equal application of those criteria, and prevent discrimination or dismissals on the grounds of marriage, pregnancy or parenthood".[180]
  - Moreover, business enterprises should pay special attention to any particular human rights impacts on individuals from groups or populations that may be at heightened risk in particular industry and context, as for example women.[181]
  - The OECD Guidelines recognizes that companies are often part of long production chains. They can monitor one another and question how they respect local and national legislation and international norms on gender equality. The requirements that companies set for their suppliers can be included in contractual agreements.[182]

This leads to assessment elements	
1	The financial institution has made a public commitment to gender equality. It has a stand-alone gender strategy or has incorporated gender equality and women's empowerment into its business strategy.
2	The financial institution provides trainings to address gender-based discrimination and biases in the workplace
3	The financial institution actively manages equal remuneration
4	The financial institution has systems in place to prevent and mitigate gender discrimination of its customers.
6	The financial institution provides targeted professional development for employees to promote equal access for women to senior level positions.
8	The financial institution discloses the % of financing to women-owned businesses OR other vulnerable groups, on the total amount of financing to MSMEs.
9	Companies have made a public commitment to gender equality. It has a stand-alone gender strategy or has incorporated gender equality and women's empowerment into its business strategy.
10	Companies provide trainings to address gender-based discrimination and biases in the workplace.
11	Companies actively manage equal remuneration

This leads to assessment elements	
12	Companies have systems in place to prevent and mitigate gender discrimination of its customers.
14	Companies provide targeted professional development, and where necessary also education and training, for employees to promote equal access for women to senior level positions.

- **EBA Guidelines on Remuneration Policies and Practices**

  The remuneration rules introduced in the European Union's Capital Requirements Directive are elaborated by the European Banking Authority in Guidelines on Remuneration Policies and Practices, of which the most recent version was published in 2021. These Guidelines specify that remuneration policies of financial institutions must be gender neutral and respect the principle of equal pay for male and female workers for equal work or work of equal value.

This leads to assessment element	
3	The financial institution actively manages equal remuneration

- **IFC Performance Standards**

  The relevant IFC Performance Standards on gender equality are the following:

  - "The client will base the employment relationship on the principle of equal opportunity and fair treatment, and will not discriminate with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, and disciplinary practices".[183]
  - "The client will take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to women".[184]

This leads to assessment elements	
2	The financial institution provides trainings to address gender-based discrimination and biases in the workplace
3	The financial institution actively manages equal remuneration
6	The financial institution provides targeted professional development for employees to promote equal access for women to senior level positions.
10	Companies provide trainings to address gender-based discrimination and biases in the workplace.
11	Companies actively manage equal remuneration
14	Companies provide targeted professional development, and where necessary also education and training, for employees to promote equal access for women to senior level positions.

- **Women's empowerment principles**

  The Women's Empowerment Principles (WEP) are a joint undertaking of the Global Compact and UN Women. These seven principles provide a tool for business to assess and benchmark their own business policies and practices against gender equality international standards. The principles are the following:[185]

  1. Establish high-level corporate leadership for gender equality. Relevant organisational goals are:
     - Ensure that all policies are gender-sensitive.
  2. Treat all women and men fairly at work - respect and support human rights and non-discrimination. Relevant organisational goals are:

- Pay equal remuneration, including benefits, for work of equal value and strive to pay a living wage to all women and men.
- Ensure that workplace policies and practices are free from gender-based discrimination.
- Implement gender-sensitive recruitment and retention practices and proactively recruit and appoint women to managerial and executive positions and to the corporate board of directors.

3. Ensure the health, safety and well-being of all women and men workers. Relevant organisational goals are:
   - Establish a zero-tolerance policy towards all forms of violence at work, including verbal and/or physical abuse and prevent sexual harassment.
4. Promote education, training, and professional development for women.
5. Implement enterprise development, supply chain and marketing practices that empower women. Relevant organisational goals are:
   - Support gender-sensitive solutions to credit and lending barriers.
   - Ask business partners and peers to respect the company's commitment to advancing equality and inclusion.
   - Ensure that company products, services and facilities are not used for human trafficking and/or labour or sexual exploitation.
6. Promote equality through community initiatives and advocacy.
7. Measure and publicly report on progress to achieve gender equality. Relevant organisational goals are:
   - Make public the company policies and implementation plan for promoting gender equality.
   - Establish benchmarks that quantify inclusion of women at all levels.
   - Measure and report on progress, both internally and externally, using data disaggregated by sex.
   - Incorporate gender markers into ongoing reporting obligations.

As to the implementation of these principles and the tools for measuring progress, the WEP's recommend:

- Clearly define the company's strategic case for advancing gender equality within the organisation and in its field.
- Prominently publicize an explicit company statement that prohibits gender-based discrimination in hiring, retention policies, promotion, salaries, and benefits.

This leads to assessment elements	
1	The financial institution has made a public commitment to gender equality. It has a stand-alone gender strategy or has incorporated gender equality and women's empowerment into its business strategy
2	The financial institution provides trainings to address gender-based discrimination and biases in the workplace
3	The financial institution actively manages equal remuneration
4	The financial institution has systems in place to prevent and mitigate gender discrimination of its customers.
6	The financial institution provides targeted professional development for employees to promote equal access for women to senior level positions.

7	The financial institution demonstrates its commitment to family life and work-life balance by supporting childcare, parental leave, and other care responsibilities (e.g., breastfeeding, dependent care).
9	Companies have made a public commitment to gender equality. It has a stand-alone gender strategy or has incorporated gender equality and women's empowerment into its business strategy.
10	Companies provide trainings to address gender-based discrimination and biases in the workplace.
11	Companies actively manage equal remuneration
12	Companies have systems in place to prevent and mitigate gender discrimination of its customers.
14	Companies provide targeted professional development, and where necessary also education and training, for employees to promote equal access for women to senior level positions.

- **The UN Declaration on the Rights of Indigenous Peoples**

  The UN Declaration on the Rights of Indigenous Peoples adopted by the UN General Assembly in 1997 calls on States to pay particular attention to the rights and special needs of indigenous women when measures are taken to ensure continuing improvement of economic and social conditions. It also calls for full protection and guarantees against all forms of violence and discrimination against women.[186]

This leads to assessment elements	
1	The financial institution has made a public commitment to gender equality. It has a stand-alone gender strategy or has incorporated gender equality and women's empowerment into its business strategy
9	Companies have made a public commitment to gender equality. It has a stand-alone gender strategy or has incorporated gender equality and women's empowerment into its business strategy.

- **Other guidelines for companies**

  The Gender Equality Global Report and Ranking is a private initiative developed by Equileap that aims to accelerate gender equality in the workplace. The ranking is part of a comprehensive tool-kit designed to make the gender performance of public companies transparent and comparable, and to enable corporations to understand how they can improve performance. Equileap scores companies in four categories:

  - A: Gender Balance in Leadership and Workforce
  - B: Equal Compensation and Work/Life Balance
  - C: Policies Promoting Gender Equality
  - D: Commitment to Women's Empowerment

  Within category A, Equileap measures the percentage of male and female in the Board of Directors, executive positions, and senior management.[187]

This leads to assessment elements	
5	The financial institution guarantees at least 40-60% participation and equal access for women on the Board of Directors, Executive positions, and Senior management level.
13	Companies guarantee at least 40-60% participation and equal access for women on the Board of Directors, Executive positions, and Senior management level.

- **Procurement and supply chains**

Companies are often part of long procurement and supply chains. They can monitor one another and question how they respect local and national legislation and international norms on labour rights. The requirements that companies set for their suppliers can be included in contractual agreements.

The importance of this has also been recognised in the OECD Guidelines for Multinational Enterprises.The OECD Due Diligence Guidance for Responsible Business Conduct provides practical support to companies on the implementation of the OECD Guidelines for Multinational Enterprises by providing plain language explanations of its due diligence recommendations. Implementing these recommendations can help companies avoid and address adverse impacts that may be associated with their operations, supply chains and other business relationships.

Furthermore, ISO 26000:2010 Guidance on social responsibility recognises the importance of supply chain responsibility, because “the impacts of an organisation's decisions or activities can be greatly affected by its relationships with other organisations”.[188] A company’s sphere of influence includes relationships within and beyond an organisation’s supply chain. Moreover, ISO 26000:2010 Guidance on social responsibility recommends setting contractual provisions or incentives as a means of exercising influence.[189]

In addition, ISO 20400:2017 Sustainable procurement – Guidance provides guidelines for organisations, independent of their activity or size, on integrating sustainability within procurement, as described in ISO 26000:2010 Guidance on social responsibility. It is intended for stakeholders involved in, or impacted by, procurement decisions and processes.

This leads to assessment elements	
15	Companies include gender and women’s rights criteria in their procurement and operational policies.
16	Companies include clauses on the compliance with gender and women’s rights criteria in their contracts with subcontractors and suppliers.

2.5 Human rights

2.5.1 Assessment elements

Although financial institutions are usually not directly causing violations of human rights, they can be held jointly responsible if the companies or governments in which they invest violate human rights. Financial institutions' responsibility to respect human rights encompasses not only their own operations (with their employees, suppliers, clients) but also the actual or potential impacts they are connected to through their institutional investments, lending, and underwriting activities. Financial institutions should seek to prevent and mitigate human rights abuses caused by companies they lend to or invest in, and also encourage them to provide remedy where they have caused or contributed to abuses. In practice, these responsibilities take shape in processes of engagement with their clients and investees.[190]

The following elements are crucial for a policy regarding the financial institution's internal operations:

1. The financial institution is committed to respecting internationally recognised human rights standards and meeting the corporate responsibility to respect human rights as defined in the UN Guiding Principles on Business and Human Rights.
2. The financial institution has a zero-tolerance policy towards all forms of discrimination in employment and occupation, including on the basis of gender, race, ethnicity, sexual orientation (including LGBTQIA+), and physical ability.

The following elements are crucial for a policy regarding the financial institution's management of its portfolio of corporate loans and investments:

3. The financial institution recognises that it can be directly linked to human rights adverse impacts through its lending and/or investment activities and commits to use leverage to enable remedy when such situations occur.
4. The financial institution commits to engaging and respecting the freedom of expression of human rights defenders.

The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:

5. Companies respect all human rights as described in the United Nations Guiding Principles on Business and Human Rights.
6. Companies have processes to enable the *remediation* of any adverse human rights impact which they cause or to which they contribute.
7. Companies establish or participate in effective operational-level grievance mechanisms for individuals and communities who may be adversely impacted.
8. Companies respect the rights of indigenous peoples in the course of their operations.
9. Companies prevent conflicts over land rights and acquire natural resources only by engaging in meaningful consultation with local communities and obtaining free, prior, and informed consent (FPIC) when it concerns indigenous peoples.
10. Companies prevent conflict over land rights and acquire natural resources only with free, prior, and informed consent (FPIC) of peoples with customary tenure rights.
11. Companies operating in contexts where civic space is restricted, commit to protecting the rights of human and environmental rights defenders (CSOs, trade unions, activists, journalists, etc.)
12. Companies have special attention for respecting the rights of persons with disabilities.

13. Companies do not enable settlements, including their economic activities, in occupied territories, in respect of International Humanitarian Law.
14. Companies integrate human rights criteria into their procurement and operational policies.
15. Companies include clauses on compliance with human rights criteria in their contracts with subcontractors and suppliers.

2.5.2 What is at stake?

Human rights are rights and freedoms inherent to all human beings, whatever their nationality, place of residence, sex, national or ethnic origin, colour, religion, language, or any other status.[191] The rights and freedoms that are generally considered as human rights comprise of civil and political rights – such as the right to life, freedom of expression and equality before the law – and economic, social and cultural rights – such as the right to an adequate standard of living, the right to food, work and education. Human rights also include collective rights, such as the rights to development and self-determination.

On 10 December 1948, the United Nations General Assembly adopted the Universal Declaration of Human Rights (UDHR) that for the first time in human history spelled out 30 basic civil, political, economic, social, and cultural rights that all human beings should enjoy. It has over time been widely accepted as the fundamental principles of human rights that everyone should adhere to. Through a series of international human rights treaties and other instruments these human rights have developed into a body of legal international human rights. While international treaties and customary law form the backbone of international human rights law, other instruments, such as declarations, guidelines and principles adopted at the international level contribute to its understanding, implementation, and development.

There are particular groups who, for various reasons, are vulnerable or have traditionally been victims of violations and consequently require special protection for the equal and effective enjoyment of their human rights, such as women and girls, children, disabled persons, migrant workers and indigenous peoples. Specific human rights instruments, such as the Convention on the Rights of the Child (UNCRC) or the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), have been developed to set out additional guarantees for persons belonging to these groups.[192] Descent-based discrimination, including discrimination against members of communities based on forms of social stratification such as caste and analogous systems of inherited status, is a concern in a number of countries.[193]

Globalisation presents new and complex challenges for the protection of human rights. Economic actors, especially multinational companies that operate across national borders, have gained unprecedented power and influence across the world. Companies have an enormous impact on people's lives and the communities in which they operate. Sometimes their impact is positive - jobs are created, new technology improves lives and investment in the community translates into real benefits for those who live there. But there are also countless instances when corporations have a negative impact, such as when they exploit weak or poorly enforced domestic regulations[194], or even worse, when they violate human rights regulations.[195]

In some economic sectors, such as the mining, oil & gas, and agriculture sectors, the risks for human rights abuses are particularly high. Traditional livelihoods can be destroyed through land acquisition (land grabs), land contamination and water pollution.[196] In these scenarios, economic, social, and cultural rights at stake are for example the right to food, work, housing, health, and a healthy environment. Moreover, the impact can be particularly severe for certain specific groups, such as indigenous peoples, because their way of life and their identity is often closely related to their land. Far too often, companies operating across borders are involved in severe abuses, such as child labour, forced labour or forced evictions. In addition, affected communities are frequently denied access to information about the impact of company operations. This means that they are excluded from participating in decisions that affect their lives. And, often when communities attempt to get justice, they are thwarted by ineffective legal systems, corruption, or powerful state-corporate alliances. Worryingly, when the poor cannot secure justice, companies learn that they can exploit poverty without consequences.[197]

In 2023, at least 300 human rights defenders promoting social, environmental, racial and gender justice in 28 countries were murdered according to a report published by the advocacy group Front Line Defenders (FLD)[198]. Indigenous peoples' rights defenders were the most targeted group in 2023, with a total of 92 killings registered in Brazil, Colombia, Ecuador, Guatemala, Honduras, Indonesia, Mexico, Nicaragua, Paraguay, Peru and the Philippines. 49 of the defenders killed identified as women, including transwomen, and 14 were members of the LGBTIQ+ community and defended its rights. [199] The killings of land defenders is frequently linked to global industries such as agribusiness, mining, and logging.[200] Similarly, the UN Special Rapporteur on the rights of Human Rights Defenders has recognised defenders working on land-related issues as among of the world's most vulnerable of Human Rights Defenders.[201]

Human rights risks are particularly prevalent in situations of armed conflict and in territories under occupation.[202] International human rights law (IHL) therefore prohibits various kinds of activities in occupied territories, such as population transfer, forcible displacement, and confiscation of private land. Given these prohibitions, companies have a special responsibility to prevent their activities from contributing to or exacerbating human rights violations in occupied territories.

Under international human rights law, states have an obligation to protect human rights, which requires them to take measures to ensure that other actors, including companies, do not undermine or violate human rights. However, government failure to protect human rights does not absolve non-state actors, such as companies and financial institutions, from responsibility for their own adverse human rights impacts.

This corporate responsibility to respect human rights was further defined in 2008 as part of the *Protect, Respect and Remedy Framework* by the late professor John Ruggie, the former UN Special Representative of the Secretary-General on Business and Human Rights. This framework rests on three pillars:[203]

- the state duty to protect against human rights abuses by third parties, including business enterprises;
- the corporate responsibility to respect human rights; and
- the need for greater access by victims to effective remedy, both judicial and non-judicial.

At the request of the UN Human Rights Council (HRC), the Protect, Respect and Remedy Framework has been operationalised as the United Nations Guiding Principles on Business and Human Rights (UNGPs), which were unanimously endorsed by the HRC in June 2011.[204] The UNGPs are currently considered the main global standard addressing the risks of adverse impacts on human rights that are linked to business activities. It is well established that this corporate responsibility also applies to the entire range of financial institutions and actors, including commercial banks, retail banks, investment banks, rating agencies, financial service providers, and institutional investors.[205]

In 2014 the HRC adopted resolution 26/9 "to establish an open-ended intergovernmental working group on transnational corporations and other business enterprises with respect to human rights, whose mandate shall be to elaborate an international legally binding instrument to regulate, in international human rights law, the activities of transnational corporations and other business enterprises."[206] The Tenth session to discuss the elements for a draft legally binding instrument took place in December 2024 in Geneva. (Switzerland).[207]

Meanwhile, the principles behind the UNGPs are already being integrated in the legislations of different jurisdictions, such as the 2017 French Corporate Duty of Vigilance Law, the German Lieferkettengesetz and the CSDDD in the EU.

At the European Union level, the Directive on Corporate Sustainability Due Diligence (CSDD) has finally been adopted by the European Council in May 2024, and entered into force on July 2024. The directive introduces obligations for large companies regarding adverse impacts of their activities on human rights and environmental protection. It also lays down the liabilities linked to these obligations. The rules concern not only the companies' operations, but also the activities of their subsidiaries, and those of their business partners along the companies' chain of activities.[208] Inclusion of the finance industry in CSDDD was the subject of intense debate throughout the negotiation process and proved to be a major sticking point among EU governments. Despite intense lobbying, the finance industry is in scope of CSDDD, with downstream due diligence out of scope.[209]

Human rights are central to the Sustainable Development Goals (SDGs) as well. They form the basis of many goals such as SDG 1: No Poverty, SDG 2: Zero Hunger, SDG 3: Good Health and Well-being, SDG 4: Quality of Education, SDG 5: Gender Equality, SDG 6: Clean Water and Sanitation, SDG 10: Reduce Inequalities, and SDG 16: Peace, Justice and Strong Institutions.[210] Additionally, SDG 8: Decent Work and Economic Growth also aims to: "eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms."[211] SDG 8 also includes a target on protecting labour rights and promoting safe and secure working environment for all workers, including migrant workers, in particular women migrants, and those in precarious employment. An extensive discussion of labour rights is found in section 0.

In 2020, the Principles for Responsible Investment (PRI) announced that it was setting out a multi-year agenda for its work towards respect for human rights being implemented in the financial system[212]. PRI's report outlines a three-step process for investors to demonstrate their respect for human rights:

- publishing a policy commitment
- having due diligence processes in place
- enabling of providing access to remedy

On May 2023, the PRI issued a new reporting guidance on human rights to support investors to reporton how they consider and monitor social factors and human rights.[213]

In July 2021, the EU Platform on Sustainable Finance published a draft report for stakeholder feedback on the merits and potential design of a social taxonomy. A second version of the report was released in February 2022.[214] A social taxonomy would enable investors to identify and allocate capital towards economic activities that are socially sustainable and make significant contributions to human rights objectives. Built on the foundation of international norms and principles like the Sustainable Development Goals (SDGs) and the UN Guiding Principles for Businesses and Human Rights (UNGPs), the objective of a social taxonomy would be to help investors to contribute to finance solutions around ensuring decent work, enabling inclusive and sustainable communities and affordable healthcare and housing.[215] However no progress has been made since then.

At the European Union level, the Directive on Corporate Sustainability Due Diligence (CSDD) has finally been adopted by the European Council in May 2024, and entered into force on July 2024. The directive introduces obligations for large companies regarding adverse impacts of their activities on human rights and environmental protection. It also lays down the liabilities linked to these obligations. The rules concern not only the companies' operations, but also the activities of their subsidiaries, and those of their business partners along the companies' chain of activities.[216] Inclusion of the finance industry in CSDDD was the subject of intense debate throughout the negotiation process and proved to be a major sticking point among EU governments. Despite intense lobbying, the finance industry is in scope of CSDDD, but downstream due diligence remains out of scope, creating a big loophole.[217]

In September 2024, The Taskforce on Inequality and Social-related Financial Disclosures (TISFD) was launched. This global initiative aims to develop a comprehensive framework for businesses and financial institutions to report on risks, dependencies, and opportunities related to social issues, including inequality. TISFD seeks to align its guidelines with existing frameworks, standards and benchmarks, providing a unified approach to integrating social considerations into financial and sustainability disclosures. The TISFD was launched through the collaborative efforts of a diverse set of more than 20 organisations across the public, social, and private sectors including Fair Finance Asia.

2.5.3 International standards and initiatives

The main international standards on human rights are summarised per topic, followed by the assessment elements that are formulated by the FFGI Methodology as a result:

- **United Nations Human Rights Conventions**

  Because companies can have an impact on the entire spectrum of internationally recognized human rights, their responsibility to respect applies to all such rights. In practice, some human rights may be at greater risk than others in particular industries or contexts, and therefore these should be the focus of heightened attention. However, situations may change, so all human rights should be the subject of periodic review.

  An authoritative list of the core internationally recognized human rights is contained in the International Bill of Human Rights, consisting of the Universal Declaration of Human Rights (UDHR) and the main instruments through which it has been codified: the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights (ICESCR), coupled with the principles concerning fundamental rights in the eight ILO core conventions as set out in the Declaration on Fundamental Principles and Rights at Work (for the latter, see section 2.6).

  On 10 December 1948, the UN General Assembly adopted the Universal Declaration of Human Rights (UDHR), including civil, political, economic, social, and cultural rights and freedoms in a single international human rights instrument. Examples include the right to life, to freedom of movement, to peaceful assembly, to thought, conscience and religion. According to the UDHR, everyone is entitled to all these rights and freedoms without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status.[218]

  The International Covenant on Civil and Political Rights (ICCPR) was adopted in 1966 and comprises 55 articles that focus on civil and political rights and freedoms, such as the freedom of religion and expression, the freedom from torture, right to privacy, the right to a fair trial, or the rights participate in political and public life.

  The International Covenant on Economic, Social and Cultural Rights (ICESCR) was adopted in 1966 and comprises of 31 articles related to the workplace, social security, family life, participation in cultural life, or access to housing, food, water, health care and education. The content of the rights protected by the ICESCR has been elaborated by the Committee on Economic, Social and Cultural Rights. According to this committee, State Parties to the Covenant have to make sure that water and food are available, accessible and of good quality.[219] The right to health refers to the right to a healthy living environment as well as the right to physical and mental health.[220]

- **United Nations Guiding Principles on Business and Human Rights**

  The 2011 United Nations Guiding Principles on Business and Human Rights (UNGPs) establish that companies, including financial institutions, should respect human rights. The responsibility to respect human rights is a global standard of expected conduct for all companies wherever they operate. It exists independently of states' abilities and/or willingness to fulfil their own human rights obligations, and does not diminish those obligations. Furthermore, this responsibility exists over and above compliance with national laws and regulations protecting human rights.

The responsibility to respect human rights requires that companies:[221]

- Avoid causing or contributing to adverse human rights impacts through their own activities, and address such impacts when they occur; and
- Seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products, or services by their business relationships, even if they have not contributed to those impacts.

According to Principle 15 of the UNGPs, in order to meet the responsibility to respect human rights, companies should have in place:

- A *policy commitment* to meet their responsibility to respect human rights;
- A *human rights due-diligence process* to identify, prevent, mitigate, and account for how they address their impacts on human rights; and
- Processes to enable the *remediation* of any adverse human rights impacts.

UNGPs 16 to 24 provide operational guidance on how the required policies and processes should be put into practice.

The UNGPs expect companies, including financial institutions, to identify general areas where the risk of adverse impacts is most significant and to prioritize due-diligence on their clients accordingly, through screening and monitoring clients when the risk is high, and/or when a risk is brought to the attention of the company (e.g. by an external stakeholder).

According to the UNGPs, if a company identifies a risk that it will *cause* an adverse impact, it is within its powers to cease or prevent that impact and should make sure to do so. If a company identifies a risk of *contributing* to an adverse impact, it has control over its contribution and should therefore cease or prevent its contribution and use its leverage with other entities also contributing to the adverse impact to persuade them to cease or prevent any further impacts and to mitigate any remaining impacts to the greatest extent possible. In both cases, the enterprise should provide or *contribute to a remedy*.[222]

If a company identifies a risk or is made aware of adverse impacts being *directly linked* to its operations, products, and services through its business relationships, it should seek to use its leverage to influence the entity causing the adverse impact to prevent or mitigate that impact and future impacts. This can be done by the company itself or in co-operation with other entities, as appropriate.[223]

In July 2017, the Office of the High Commissioner for Human Rights (OHCHR) published an interpretative advice note on the banking sector's responsibilities for managing the human rights impacts of its finance. The OHCHR stressed that banks can contribute to adverse human rights impacts through their finance. In such circumstances, the bank may be responsible for remediating the human rights impact together with its client. The OHCHR also stated that a bank may be directly linked to a human rights impact through its finance, without contributing to it, in which case it would not be responsible for remedying the impact, although it may take a role in doing so.[224]

The OECD Guidelines for Multinational Enterprises, the fourth version of the Equator Principles and the new GRI Universal Standard have all aligned their human rights recommendations with the UNGPs. The 2023 edition of the Guidelines includes clearer reference to all the steps of the OECD Due Diligence, the UNGPs and ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.

This leads to assessment elements	
1	The financial institution is committed to respecting internationally recognised human rights standards and meeting the corporate responsibility to respect human rights as defined in the UN Guiding Principles on Business and Human Rights.
3	The financial institution recognises that it can be directly linked to human rights adverse impacts through its lending and/or investment activities and commits to use leverage to enable remedy when such situations occur.
5	Companies respect all human rights as described in the United Nations Guiding Principles on Business and Human Rights.
6	Companies have processes to enable the remediation of any adverse human rights impact which they cause or to which they contribute.

- **Access to remedy**

  As per the OECD Guidelines for Multinational Enterprises, enterprises should "*Seek to prevent or mitigate an adverse impact where they have not contributed to that impact, when the impact is nevertheless directly linked to their operations, products or services by a business relationship. This is not intended to shift responsibility from the entity causing an adverse impact to the enterprise with which it has a business relationship.*"[225] The Guidelines also recognise the responsibility of entities that are found to be directly linked to adverse human rights impacts but not necessarily causing it. Such entities have a responsibility to use or increase their leverage on the entity causing the impact to prevent, mitigate, or remediate that impact.[226]

This leads to assessment element	
3	The financial institution recognises that it can be directly linked to human rights adverse impacts through its lending and/or investment activities and commits to use leverage to enable remedy when such situations occur.

- **Grievance mechanisms**

  In the UNGPs, the lack of grievances procedures is mentioned as a weak point of companies. In an earlier report the Special Representative for Business and Human Rights had indicated that "In the absence of an effective grievance mechanism, the credibility of such initiatives and institutions may be questioned."[227]

  Guiding Principle 29 therefore expects companies to establish or participate in effective operational-level grievance mechanisms for individuals and communities who may be adversely impacted. Guiding Principle 31 details the criteria to ensure the effectiveness of grievance mechanisms. It also includes expectation that mechanisms must be:[228]

  - Legitimate;
  - Accessible;
  - Predictable;
  - Equitable;
  - Transparent;
  - Rights-compatible;
  - A source of continuous learning, and
  - Based on engagement and dialogue.

This leads to assessment element	
7	Companies establish or participate in effective operational-level grievance mechanisms for individuals and communities who may be adversely impacted.

- **Land rights, conflicts and forced evictions**

  Human rights, particularly Economic, Social and Cultural (ESC) rights, play a central role in land-related issues. Those who face threats to their land are being denied many rights such as the right to food, the right to water, the right to housing and the right to work. These rights are included in the above-mentioned International Covenant on Economic, Social and Cultural Rights (ICESCR).[229] Land is thus a critical cross-cutting issue at the nexus of social, environmental and governance rights. The links between land human rights, environmental issues, and governance challenges such as corruption and extrajudicial violence are rendered invisible if land-related responsibilities are not articulated specifically. This principle has been well established in the business sector for several years.

  A number of banks have recognised land as a key issue – for example, with Free, Prior, and Informed Consent (FPIC) being a key issue included in the Equator Principles' third review (EP4). FPIC is constituted as a commitment under the Equator Principles, but only for "designated countries" (i.e. developing countries). Equator Principles' banks and civil society have raised the need to have a more coherent approach to FPIC.[230]

  The right to adequate housing encompasses the right to live in security, peace, and dignity. To realize this right, governments have an obligation to guarantee security of tenure, which essentially means a set of arrangements in the context of housing and land that will protect the occupants from forced evictions and other threats and harassment.[231]

  As noted by the UN Special Rapporteur on Adequate Housing Raquel Rolnik: "Involuntary resettlement amounts to a forced eviction when it occurs without the provision of, and access to, appropriate forms of legal or other protection."[232] The effects of forced evictions can be very serious, especially for people who are already living in poverty. The former UN Commission on Human Rights (currently the Human Rights Council) has described forced evictions as a "gross violation of human rights, particularly the right to adequate housing."[233]

  The FAO developed the Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security (VGGT) in 2012, to improve the governance of tenure of land, fisheries and forests with the overarching goal of achieving food security for all and to support the progressive realization of the right to adequate food in the context of national food security.

  In May 2011, the Tirana Declaration was adopted by over 150 representatives of civil society organisations, social movements, grassroots organisations, international agencies, and governments - including the members and strategic partners of the International Land Coalition (ILC) such as the World Bank, the Food and Agriculture Organisation (FAO), the International Institute for Environment and Development (IIED) and the International Fund for Agricultural Development (IFAD). The Declaration defines land grabbing as: "acquisitions or concessions that are one or more of the following:

  - In violation of human rights, particularly the equal rights of women;
  - Not based on free, prior and informed consent of the affected land-users;
  - Not based on a thorough assessment, or are in disregard of social, economic and environmental impacts, including the way they are gendered;
  - Not based on transparent contracts that specify clear and binding commitments about activities, employment and benefits sharing, and
  - Not based on effective democratic planning, independent oversight and meaningful participation."[234]

  In 2022 the Land Rights Standard was developed by the Rights and Resources Initiative (RRI), the Global Landscapes Forum (GLF) and the Indigenous Peoples Major Group (IPMG). It aims a simple set of principles that applies existing international legal requirements and best practice standards in recognizing and respecting Indigenous Peoples', Local Communities' and Afro-

Descendant Peoples' land and resource rights in landscape restoration, management, conservation, climate action, and development projects and programs.

The extension of FPIC beyond merely indigenous communities (see next paragraph) to all affected communities, including communities with customary tenure rights, is an emerging good practice across these different standards.[235] A large majority of local communities in Africa and developing countries, often depending on land and natural resources for their livelihoods and food security and most at risk of losing access to the land they use, are still left insufficiently protected.[236] FPIC has the advantage to correspond to a well-established definition with clear steps for the consultation.

A company should not acquire land, natural resources, or associated licenses which – in their provenance – have been acquired illegally or in violation of local peoples' rights, even where formal land titles have been issues, creating confusion with legitimate land rights holders.[237] The issue of land-related rights violations means that these need to be seen as ongoing criminal acts until such time as land is returned to the rightful owners and custodians.

This leads to assessment elements	
9	Companies prevent conflicts over land rights and acquire natural resources only by engaging in meaningful consultation with local communities and obtaining free, prior and informed consent (FPIC) when it concerns indigenous peoples.
10	Companies prevent conflict over land rights and acquire natural resources only with free, prior and informed consent (FPIC) of peoples with customary tenure rights.

- **Indigenous peoples' rights**

  Indigenous peoples often face a number of land related challenges. Some of the most common include forced evictions due to development projects, discrimination, failure to respect and support indigenous modes of production such as pastoralism and subsistence hunting/gathering, dismissal of their customary systems of governing land and other natural resources, or disregard of their sacred sites and the spiritual relationship with their lands. Moreover, indigenous peoples' traditional lands are often located in remote areas that have fragile ecosystems which makes them more vulnerable to natural disasters.[238]

  The UN Declaration on the Rights of Indigenous Peoples (UNDRIP), adopted in 2007, sets out the individual and collective rights of indigenous peoples, including their right to self-determination and to maintain and strengthen their distinct political, legal, economic, social and cultural institutions. The Declaration also prohibits discrimination against indigenous peoples. Moreover, it recognizes the rights of indigenous peoples to their land, habitat, and other resources that they traditionally own, cultivate or otherwise use. In addition, indigenous people are guaranteed in the Declaration the right not to be forcibly removed from their lands or territories, and that no relocation shall take place without their free, prior, and informed consent (FPIC) and after agreement on just and fair compensation and, where possible, with the option of return.[239]

  Additionally, article 8(j) of the Convention on Biological Diversity (CBD), adopted in 1992, considers the fair and equal use and the advantages of biological diversity, and requires that traditional knowledge of indigenous and local communities can only be used with their permission. According to the related Nagoya Protocol on Access and Benefit-Sharing, adopted in 2010, this also applies to access to and utilization of genetic resources.

  The International Labour Organisation (ILO) has also developed relevant international standards for indigenous peoples. The Convention concerning Indigenous and Tribal Peoples (No. 169) protects countries and habitats of indigenous peoples. The convention describes measures to protect the rights of these peoples on the use of areas they had traditionally access to and that are important for their livelihood and traditional activities. It includes the right of indigenous peoples to Free, Prior and Informed Consent (FPIC) on decisions that can influence their habitats and natural resources.[i]

The Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security (VGGT) refer to the need for states and other actors to recognize the "social, cultural, spiritual, economic, environmental and political value" of lands, fisheries and forests to indigenous peoples.[240] The VGGT refer to the UN Declaration on the Rights of Indigenous Peoples and require participation, meaningful consultation and FPIC when indigenous lands or territories are affected.

At the regional level, it is relevant to highlight that the Inter-American Development Bank recognises in its 2006 multisectoral Operational Policy on Indigenous Peoples and Strategy for Indigenous Development that the life and the culture of peoples that live in voluntary isolation or have not yet been in contact with the outside world have to be protected against potential investments. The bank obliges itself not to invest in or finance any project that may have negative consequences for these peoples.[241]

This leads to assessment elements	
8	Companies respect the rights of indigenous peoples in the course of their operations.
9	Companies prevent conflicts over land rights and acquire natural resources only by engaging in meaningful consultation with local communities and obtaining free, prior and informed consent (FPIC) when it concerns indigenous peoples.
10	Companies prevent conflict over land rights and acquire natural resources only with free, prior and informed consent (FPIC) of peoples with customary tenure rights.

- **Rights of human and environmental rights defenders**

The OECD Guidelines for Multinational Enterprises call on enterprises to refrain from reprisals against human rights defenders and address the harms of reprisals in their own and business partners' operations. The Guidelines also expect enterprises to take steps to create a "*space where concerns about adverse impacts related to their activities or the activities of entities with which they have a business relationship can be safely expressed. Refraining from and taking steps to prevent the use of reprisals are important to protecting civic space and to preventing harm to groups and individuals who seek to or do investigate, express or report such concerns.*"[242]

This leads to assessment element	
4	The financial institution commits to engaging and respecting the freedom of expression of human rights defenders.
11	Companies operating in contexts where civic space is restricted, commit to protecting the rights of human and environmental rights defenders (CSOs, trade unions, activists, journalists, etc.)

- **Rights of persons with disabilities**

The UN Convention on the Rights of Persons with Disabilities (CRPD), adopted in 2006, adopts a broad definition of persons with disabilities as "those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others".[243]

---

i In its Working Paper on FPIC, the United Nations Workgroup Indigenous Peoples of the Sub-Commission on the Promotion and Protection of Human Rights describes the right of indigenous peoples to Free, Prior Informed Consent (FPIC) on decisions that can influence their habitats and natural resources. The FPIC-principle requires the full and timely publication of information on the potential consequences of proposed investment plans. Communities have the right to respond to this in a negotiation process. This gives them more influence in decision-making processes, offers them the opportunity to negotiate any direct advantages and to speak out in favour of or against the plans.

The CRPD defines the fundamental human rights of people with disabilities. It “reaffirms that all persons with all types of disabilities must enjoy all human rights and fundamental freedoms. It clarifies and qualifies how all categories of rights apply to persons with disabilities and identifies areas where adaptations have to be made for persons with disabilities to effectively exercise their rights and areas where their rights have been violated, and where protection of rights must be reinforced”.[244]

This leads to assessment element	
2	The financial institution has a zero-tolerance policy towards all forms of discrimination in employment and occupation, including on the basis of gender, race, ethnicity, sexuality, and physical ability.
13	Companies have special attention for respecting the rights of persons with disabilities.

- **Activities in occupied territories**

International Humanitarian Law (IHL) applies in situations of armed conflict. It seeks to limit the effects of armed conflict by protecting persons who are not participating in hostilities, for example civilians, and by restricting and regulating the means and methods of warfare by combatants. IHL is inspired by considerations of humanity and aims to mitigate human suffering. IHL also includes provisions for situations of occupation and sets out obligations for the party occupying an area to ensure the rights of the population in that area.

IHL regulating occupation is described in the Fourth Geneva Convention from 1949, most of which has become customary international law. Among others, this convention prohibits transfer of the occupying country’s population into the territory, forcible transfer and confiscation of private land and property of the protected population, and changing the laws of the occupied territories. It also sets out that some of these violations (e.g. forcible transfer) amount to war crimes.

Settlements in occupied territories are consequences of, maintain and constitute various violations of IHL and customary international law. Beyond that, settlements and the infrastructure that enables settlements also violate human rights of the protected population, triggering human rights responsibilities of corporates and financial institutions.[245]

The UNGPs prescribe that enterprises should respect human rights and IHL. Therefore, companies that endorsed the UNGPs are expected to have knowledge of both human rights and IHL, to ensure that the conduct of the businesses they support is in line with it. Companies need to make sure they do not enable settlements, including their economic activities, in occupied territories.

This leads to assessment element	
14	Companies do not enable settlements, including their economic activities, in occupied territories; in respect of International Humanitarian Law.

- **Other guidelines for companies**

The OECD Guidelines for Multinational Enterprises are recommendations by governments to multinational corporations. They contain voluntary guidelines and standards for responsible enterprise behaviour in line with relevant legislation. The 2023 edition of the Guidelines includes a dedicated chapter on Human Rights with clearer reference to all the six steps of the OECD Due Diligence. The Guidelines also highlights that ‘’in the context of armed conflict or heightened risk of gross abuses, enterprises should conduct enhanced due diligence in relation to adverse impacts, including violations of international humanitarian law."

The OECD Due Diligence Guidance for Responsible Business Conduct (RBC) provides practical support to companies on the implementation of the OECD Guidelines for Multinational

Enterprises by providing plain language explanations of its due diligence recommendations. Implementing these recommendations can help companies avoid and address adverse impacts that may be associated with their operations, supply chains and other business relationships.

In addition, The OECD Centre for RBC has worked to operationalize RBC due diligence for different financial transactions and actor. As part of this work, the OECD has released the following guidelines:

- Responsible business conduct for institutional investors;[246]
- Due Diligence for Responsible Corporate Lending and Securities Underwriting; and[247]
- Responsible Business Conduct Due Diligence for Project and Asset Finance Transactions.[248]

The various IFC Performance Standards consider human rights as a cross-cutting theme and stress the importance of avoiding human rights violations and addressing all negative human rights impacts that companies may have.

The fourth version of the Equator Principles, published in November 2019, have also aligned their guidelines on human rights with the UNGPs.

The Universal Standard of the Global Reporting Initiative, which went into effect in January 2023, has integrated the UNGPs. Human rights are now considered a material topic by the GRI, meaning that companies are expected to report on their impacts on human rights.

This leads to assessment elements	
1	The financial institution is committed to respecting internationally recognised human rights standards and meeting the corporate responsibility to respect human rights as defined in the UN Guiding Principles on Business and Human Rights.
5	Companies respect all human rights as described in the United Nations Guiding Principles on Business and Human Rights.
12	Companies conduct heightened human rights due diligence on all operations and business relationships in Conflict-Affected and High-Risk Areas, to identify, prevent, mitigate and account for how they address the heightened risks in these areas.
15	Companies integrate human rights criteria into their procurement and operational policies.

- **Procurement and supply chains**

The ISO 26000:2010 Guidance on social responsibility recognise the importance of human rights. In this guideline for social responsibility of organisations, ‘respect for human right is one of the seven principles. In the core issue, the main underlying topics – risk situations, due diligence, avoiding complicity, solving grievances, discrimination and vulnerable groups, civil and political rights, economic, social, and cultural rights and fundamental principles and labour rights – are elaborated further into actions and expectations.[249]

ISO 26000:2010 also recognize the importance of integrating human rights criteria in procurement. The guidelines state that companies are often part of long production chains, and ask companies to monitor one another as well as question how they respect local and national legislation and international norms on labour rights. The requirements that companies set for their suppliers can be included in contractual agreements.[250]

In addition, ISO 20400:2017 Sustainable procurement – Guidance provides guidelines for organisations, independent of their activity or size, on integrating sustainability within procurement, as described in ISO 26000:2010 Guidance on social responsibility. It is intended for stakeholders involved in, or impacted by, procurement decisions and processes.

This leads to assessment elements	
1	The financial institution is committed to respecting internationally recognised human rights standards and meeting the corporate responsibility to respect human rights as defined in the UN Guiding Principles on Business and Human Rights.
5	Companies respect all human rights as described in the United Nations Guiding Principles on Business and Human Rights.
15	Companies integrate human rights criteria into their procurement and operational policies.
16	Companies include clauses on compliance with human rights criteria in their contracts with subcontractors and suppliers.

2.6 Labour rights

2.6.1 Assessment elements

Like other companies, financial institutions are expected to respect local, national, and international labour-related legislation and legal systems, and to endorse the five fundamental ILO principles, labour rights and the MNE Declaration in all their spheres of influence (as employers, in the companies they finance and invest in and in the supply chains of these companies).

The following elements are crucial for a policy regarding the financial institution's internal operations:

1. The financial institution respects the ILO Declaration on Fundamental Principles and Rights at Work.
2. The financial institution integrates at least the labour standards of the ILO Declaration on Fundamental Principles and Rights at Work in its procurement policies.
3. The financial institution respects the ILO Maternity Protection Convention.
4. The financial institution establishes procedures for managing and processing employee complaints and solve labour rights violations, preferably in consultation with the relevant trade union.

The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:

5. Companies uphold the freedom of association and the effective recognition of the right to collective bargaining.
6. All forms of forced and compulsory labour are unacceptable.
7. Child labour is unacceptable.
8. Companies are committed to preventing discrimination in employment and promoting fair recruitment practices.
9. Companies pay a living wage to their employees.
10. Companies apply a maximum of working hours (maximum 48 hours per week plus 12 hours of overtime).
11. Companies have a comprehensive health and safety policy.
12. Companies respect the ILO Maternity Protection Convention.
13. Companies ensure equal treatment and working conditions for migrant workers and pay special attention to informal workers.
14. Companies provide decent working conditions to homeworkers.
15. Companies establish procedures on how to deal with and process employee complaints and how to solve violations and conflicts, preferably in consultation with the relevant trade union.
16. Companies integrate labour rights criteria in their procurement policies.
17. Companies include clauses on the compliance with criteria on labour rights in their contracts with subcontractors and suppliers.

2.6.2 What is at stake?

Protecting people in their working environment is a fundamental responsibility of companies and governments. According to the International Labour Organisation (ILO), companies should engage in fair recruitment practices and should be able to prove that their employees have a safe work environment, that they are not discriminated against or mistreated, that they can deal freely with colleagues, labour unions and representative organisations, and that they are remunerated in a fair way for their services. These basic rights apply to all employees, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status. Meeting these conditions helps when developing a strong workforce that can contribute to the development of sustainable *human capital*. In addition, ensuring labour rights can contribute to the democratisation of societies, which leads to a more favourable investment climate for the corporate world.

The International Trade Union Confederation (ITUC), the world's largest trade union federation, releases an annual Global Rights Index which ranks countries based on the state of workers' rights. The analysis accounts for the ILO conventions and also assesses violations both in law and practice.

In its 11th edition, the Global Rights Index reports that workers' rights are under pressure at a global scale. These include basic rights that must be accorded to workers. Almost nine out of ten countries worldwide violate the right to strike while about eight in ten countries deny workers the right to bargain collectively for better terms and conditions.[251]

A living wage and more stringent maximum working hours, investments in professional training and respect for equality lead to better trained and more satisfied employees. In addition, safety requirements are essential to prevent accidents and to minimise the number of people that need health care. Protection of employment agreements can encourage employees to think innovatively and choose new paths. Furthermore, developing direct communication channels between employees and employers and setting up grievance and mediation procedures can contribute to productivity growth and to a greater stability of the labour market.[252]

Special attention for the position of women in the labour market is important. Women are often more exposed to informal economy and homeworking, particularly in low-and lower-middle income countries. If women earn an income, this contributes strongly to the health and productivity of families and even communities, as well as to improved prospects for their children and future generations.[253] The UN Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) endorses the right of women not to be discriminated against regarding education, labour relations, and economic and social activities.[254] Working environments where men and women are treated equally are of great importance in helping to reduce poverty and improve standards of living. In addition, it is important that such factors are also considered for women during and around the period of pregnancy. Sustainable Development Goal 5 is aimed at ending discrimination against women and girls and eliminating all forms of violence against women and girls.[255]

In this regard, the ILO Maternity Protection Convention (no. 183) stipulates that women in ratifying states are entitled, among others, to 14 weeks of maternity benefit, to a cash benefit when they are absent from work on maternity leave, which shall be no less than two-thirds of her previous earnings or a comparable amount. The convention also requires states to ensure that pregnant women or nursing mothers are not obliged to perform harmful work, and that they are protected from discrimination or dismissal based on maternity.

Special attention is also needed for the position of migrant workers. With globalisation, the number of people moving abroad to work is rapidly increasing. The ILO estimates that there are 169 million migrant workers worldwide, constituting 4.9 percent of the global labour force.[256] In the absence of proper regulations, they are vulnerable to a host of violations, from unfair recruitment practices, withholding or theft of wages to outright exploitation and horrific working conditions.[257]

The financial and economic crises of the last decade have had a significant impact on the job market: there is less security and more precarious work for employees. Job insecurity is a major problem, as less than half have a permanent contract. The ILO concludes that the world community is facing a challenge to strengthen labour market institutions and ensure the proper design of social protection systems. In particular, financial reform is required to ensure that financial institutions perform their role of channelling resources into the real economy and into investments for sustainable enterprise expansion and job creation.[258]

This is also the aim of SDG 8: Decent Work and Economic Growth: “Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all”.[259] One of the targets aims to: “eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.” A 2019 joint report by the ILO, the OECD, UNICEF, and the International Organisation for Migration (IOM) estimated that 152 million children are in child labour, while around 25 million adults were in forced labour, including in global supply chains. While this indicates a clear responsibility for states to step up efforts, the report also emphasizes the need to foster and incentivize responsible business conduct in global supply chains.[260]

The Sustainable Development Goals also include targets on protecting labour rights and promoting safe and secure working environment for all workers, including migrant workers, in particular women migrants, and those in precarious employment.[261] SDG 10: Reduced Inequalities is also related to labour rights and working conditions as it focuses on adopting and improving fiscal, wage, and social protection policies for achieving greater equality.[262]

The policies of financial institutions have to ensure they only invest in or finance companies that respect labour rights and provide decent jobs, ensuring proper working conditions. When developing policies in this respect, financial institutions can make use of the international standards described below.

2.6.3 International standards and initiatives

The main international standards on labour rights are summarised per topic, followed by the assessment elements that are formulated by the FFGI Methodology as a result:

- **ILO fundamental principles**

  The body that establishes international labour standards is the United Nations International Labour Organisation (ILO) in which governments, employers, and employees cooperate. As of 2022, the ILO has adopted 190 conventions and 208 recommendations that together deal with a wide spectrum of labour issues.[263]

  With the adoption of the ILO Declaration on Fundamental Principles and Rights at Work in 1998, the ILO identified eight of its conventions as “fundamental” conventions. At the 110th International Labour Conference in 2022, a resolution to add the principle of a safe and healthy work environment was adopted. As a result, the ILO Declaration on Fundamental Principles and Rights at Work now includes 10 ILO conventions. These ten conventions cover five topics that are considered as the fundamental principles and rights at work:[264]

  - The freedom of association and the effective recognition of the right to collective bargaining;[265]
  - The elimination of all forms of forced and compulsory labour;[266]
  - The effective abolition of child labour;[267]
  - The elimination of discrimination in respect of employment and occupation,[268] and
  - A safe and healthy work environment.[269]

  In some countries, some of these principles and rights are not yet guaranteed within financial institutions’ internal operations and supply chain policies. Therefore, it is necessary to have policies in place regarding the relevant ILO principles that apply to financial institutions themselves.[270]

This leads to assessment elements	
1	The financial institution respects the ILO Declaration on Fundamental Principles and Rights at Work.
2	The financial institution integrates at least the labour standards of the ILO Declaration on Fundamental Principles and Rights at Work in its procurement and operational policies.
5	Companies uphold the freedom of association and the effective recognition of the right to collective bargaining.
6	All forms of forced and compulsory labour are unacceptable.
7	Child labour is unacceptable.
8	Companies are committed to preventing discrimination in employment and promoting fair recruitment practices.

- **Working conditions**

  Another leading ILO document is the Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy (MNE Declaration), adopted in 1977. The MNE Declaration focuses on the responsibility of companies and specifically on their dealings with labour issues. The revision of 2017 takes into account new labour standards adopted by the International Labour Conference, the UN Guiding Principles on Business and Human Rights and the 2030 Agenda for Sustainable Development, in particular on SDG 8: Decent Work and Economic Growth.[271] The MNE Declaration emphasizes the responsibilities of both governments and companies regarding the following topics:[272]

  - General policies
  - Employment promotion
  - Social security
  - Elimination of forced or compulsory labour
  - Effective abolition of child labour: minimum age and worst forms
  - Equality of opportunity and treatment
  - Security of employment
  - Training
  - Wages, benefits, and conditions of work
  - Safety and health
  - Freedom of association and the right to organize
  - Collective bargaining
  - Consultation
  - Access to remedy and examination of grievances
  - Settlement of industrial disputes

This leads to assessment elements	
4	The financial institution establishes procedures for managing and processing employee complaints and solve labour rights violations, preferably in consultation with the relevant trade union.
8	Companies are committed to preventing discrimination in employment and promoting fair recruitment practices.
9	Companies pay a living wage to their employees.
11	Companies have a comprehensive health and safety policy.
13	Companies ensure equal treatment and working conditions for migrant workers and pay special attention to informal workers
14	Companies provide decent working conditions to homeworkers.

- **Working Hours**

  Along with working conditions, working hours are also an important subject central to the work of ILO. Already in 1919 the ILO adopted the first of many international standards, the Hours of Work (Industry) Convention, that governed the labour standards on hours of work. The provisions of the convention describe a maximum of 8 hours a day or 48 hours per week.

This leads to assessment element	
10	Companies apply a maximum of working hours (maximum 48 hours per week plus 12 hours of overtime).

- **Fair recruitment**

  Aside from fundamental principles and working conditions, recruitment is an area of particular interest. As the ILO mentions, while private employment agencies may serve an important function in ensuring an efficient and equitable (international) labour market, in the absence of a proper regulatory framework the potential for abuse is significant.[273] This is especially the case for workers seeking jobs outside of their communities or countries. With growing numbers of internal and international labour migrants, fostering fair recruitment practices is an area of increasing relevance. In the context of the Fair Recruitment Initiative, the ILO published its General Principles and Operational Guidelines for Fair Recruitment in 2019.[274]

This leads to assessment element	
8	Companies are committed to preventing discrimination in employment and promoting fair recruitment practices.

- **Living wage**

  Workers in many producing countries are not paid enough to support themselves and their families. While some of these countries do have a legal minimum wage, it is often much lower than a living wage.

  The ILO describes a living wage as "the level of wages sufficient to meet the basic living needs of an average-sized family in a particular economy".[275] ILO documents referring to living wage include the ILO Constitution and its preamble, the 2017 ILO Tripartite Declaration on Principles concerning Multinational Enterprises and Social Policy (MNE Declaration) and the 2008 ILO Declaration on Social Justice for a Fair Globalization.

  The Universal Declaration of Human Rights (UDHR) states that "everyone who works has the right to just and favourable remuneration ensuring for himself and his family an existence worthy of human dignity".[276] In addition, the 2023 OECD Guidelines for Multinational Enterprises recommend paying a wage that "should be at least adequate to satisfy the basic needs of the workers and their families".[277]

  Standards on workers' rights and conditions such as those put forth by the organisations Ethical Trading Initiative and Fair Wear Foundation, Global Living Wage Coalition also mention that a living wage should provide discretionary income in addition to cover the family's basic needs and be earned within a standard working week. For instance, the Global Living Wage Coalition defines a living wage as "The remuneration received for a standard workweek by a worker in a particular place sufficient to afford a decent standard of living for the worker and her or his family. Elements of a decent standard of living include food, water, housing, education, health care, transportation, clothing, and other essential needs including provision for unexpected events".[278]

  This results in four core criteria of a living wage:

  - Sufficient for a family;
  - Earned within a standard working week;

- Sufficient to cover basic needs, including food, water, housing, health care, transportation, clothing, and other essentials; and
- Providing some discretionary income.

The Platform Living Wage Financials is a coalition of financial institutions committed to encourage and monitor investee companies to "address the non-payment of living wage in global supply chains". The coalition is particularly focused on sectors that rely on manual labour, such as the garment and footwear industries, food retail, and companies in the food and agricultural supply chain. As of December 2024, the coalition counted 24 members, representing around EUR 7 trillion in assets under management (AUM).

This leads to assessment element	
9	Companies pay a living wage to their employees.

- **Children's rights**

  The United Nations Convention on the Rights of the Child supports the appeal for the effective abolition of child labour.

This leads to assessment element	
7	Child labour is unacceptable.

- **Women's rights**

  The UN Convention on the Elimination of All Forms of Discrimination Against Women endorses the right of women not to be discriminated against regarding education, labour relations and economic and social activities.

  See for more information on this topic the theme Gender equality (section 2.4) and the theme Human rights (section 2.5).

This leads to assessment element	
8	Companies are committed to preventing discrimination in employment and promoting fair recruitment practices

- **Migrant workers**

  The United Nations Convention on the Protection of the Rights of All Migrant Workers and Their Families adopted in 1990 emphasises the connection between migration and human rights and aims to protect migrant workers and their families. The Convention does not bring any new rights for migrants into existence, but intends to guarantee equal treatment and working conditions for migrants and nationals.

This leads to assessment element	
13	Companies ensure equal treatment and working conditions for migrant workers and informal workers.

- **Occupational Health and safety**

  The ISO 45001:2018 Occupational health and safety provides globally applicable guidelines for management systems regarding occupational health and safety. It applies to all kinds of organisations and it serves to guarantee the health and safety of both employees and external stakeholders, such as contractors' staff and visitors. The IFC has included occupational health and safety requirements in both its Performance Standards and its Environmental Health and Safety Guidelines. The ILO has asserted the right to a safe and healthy work environment first in its 1981 Occupational Safety and Health Convention and most recently in the 2017 Tripartite

Declaration of Principles Concerning Multinational Enterprises and Social Policy (MNE Declaration).

For more information on this topic, see the theme Health (section 2.9).

This leads to assessment element	
11	Companies have a comprehensive health and safety policy.

- **Other guidelines for companies**

  Various guidelines for companies endorse the five fundamental ILO principles and rights at work, as well as the MNE Declaration:

  - According to the United Nations Guiding Principles on Business and Human Rights (UNGPs), the responsibility of companies includes the fundamental principles of the ILO, together with the International Bill of Human Rights;
  - The IFC Performance Standards are used in decision-making on financing by the International Finance Corporation;
  - The ISO 26000:2010 Guidance on social responsibility recognise the importance of labour rights and good working conditions by the so-called core issue on labour practice and make various actions and expectations on a variety of related topics.[279]

- **Procurement and supply chains**

  Companies are often part of long procurement and supply chains. They can monitor one another and question how they respect local and national legislation and international norms on labour rights. The requirements that companies set for their suppliers can be included in contractual agreements.

  The importance of this has also been recognised in the OECD Guidelines for Multinational Enterprises. The OECD Due Diligence Guidance for Responsible Business Conduct provides practical support to companies on the implementation of the OECD Guidelines for Multinational Enterprises by providing plain language explanations of its due diligence recommendations. Implementing these recommendations can help companies avoid and address adverse impacts that may be associated with their operations, supply chains and other business relationships.

  Furthermore, ISO 26000:2010 Guidance on social responsibility recognises the importance of supply chain responsibility, because “the impacts of an organisation's decisions or activities can be greatly affected by its relationships with other organisations”.[280] A company’s sphere of influence includes relationships within and beyond an organisation’s supply chain. Moreover, ISO 26000:2010 Guidance on social responsibility recommends setting contractual provisions or incentives as a means of exercising influence.[281]

  In addition, ISO 20400:2017 Sustainable procurement – Guidance provides guidelines for organisations, independent of their activity or size, on integrating sustainability within procurement, as described in ISO 26000:2010 Guidance on social responsibility. It is intended for stakeholders involved in, or impacted by, procurement decisions and processes.

  The United Nations Guiding Principles on Business and Human Rights include a due diligence process in order to identify, prevent, mitigate and account for how companies address their adverse human rights impacts. The process “should cover adverse human rights impacts that the business enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships.”[282]

  Usable standard regarding labour rights and supply chain responsibility are the SA8000:2014 and the Fair Labour Association’s Workplace Code of Conduct.

This leads to assessment elements	
16	Companies integrate labour rights criteria in their procurement and operational policies.
17	Companies include clauses on the compliance with criteria on labour rights in their contracts with subcontractors and suppliers.

2.7 Tax

2.7.1 Assessment elements

For financial institutions, the issue of taxes is relevant in three ways. Primarily, international financial institutions are multinational corporations themselves and therefore they have to pay the owed taxes by the letter of the law as well as in the spirit of the countries in which they operate. Financial institutions can be expected to be transparent in their tax payments.

Secondly, virtually all financial services that financial institutions grant to companies and rich private clients have a tax component. Because large amounts are involved in business loans, financing projects and investments, tax planning can often result in significant savings for clients. Thirdly, taxes is an issue on which financial institutions should assess all their investees, even if the financial institution does not actively cooperate with tax avoidance of the company.

The following elements are crucial for a policy regarding the financial institution's internal operations:

1. For at least three quarters of the countries in which the financial institution operates and/or 75% of its total revenue, it reports country-by-country on its revenues, profit, FTEs, subsidies received from governments and tax payments to governments in a way that matches with the consolidated accounts.
2. For each country in which the financial institution operates, it reports country-by-country on its revenues, profit, FTEs, subsidies received from governments and tax payments to governments in a way that matches with the consolidated accounts.
3. For each country in which the financial institution operates, it reports country-by-country on its total assets in a way that matches with the consolidated accounts.
4. The financial institution publishes key information of any company-specific tax ruling it has obtained from tax authorities.
5. The financial institution does not have subsidiaries, branches or associates in jurisdictions with no or zero corporate tax or in jurisdictions with harmful corporate tax practices, unless they have substance and their profits are generated from local economic activities.
6. The financial institution does not provide financial services to companies in tax havens, unless the company has substance and its profits are generated by from local economic activities.

The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:

7. Companies publish their full group structure, including indirectly and jointly-owned entities.
8. Companies publish an explanation of the activities, functions and ultimate shareholder of every subsidiary, branch, joint venture, or affiliate located in jurisdictions with no or zero corporate tax practices or in jurisdictions with harmful corporate tax practices.
9. For each country in which companies operate, they report country-by-country on their revenues, profit, FTEs, subsidies received from governments and payments to governments (e.g. withholding taxes, payments for concessions and company tax).
10. Companies focus their international enterprise structure and their international transactions in a way that reflects the economic substance of the activities and transactions undertaken, without any steps made primarily to secure a tax advantage.
11. Companies publish key information of any company-specific tax ruling they have obtained from tax authorities.

12. Companies make public, to the extent legally and practically possible, the decision of any adjudication or arbitration to which it, or any of its subsidiaries, is a party, undertaken to resolve a tax dispute, whether in a court or in an arbitration setting.
13. Companies have a management system which results in immediate actions if suspicions arise that employees or suppliers are guilty of facilitating tax avoidance or evasion.
14. Companies integrate criteria on tax in their procurement policies and operational policies.
15. Companies include clauses on the compliance with criteria on tax in their contracts with subcontractors and suppliers.

2.7.2 What is at stake?

For each democratic society, tax revenues are essential to finance public provisions such as health care, education, infrastructure, and social security. Research shows that a fair system of taxation contributes more to the development of a healthy, democratic society than revenues from development aid, remittances, or from the export of raw materials. After all, in order to raise taxes, the development of a capable and reliable public administration is required, while conversely civilians that have to pay tax expect a lot more of, and are more involved with, the public administration. Following the adage “No taxation without representation”, a development towards more democracy is often closely related to the striving for higher tax revenues.[283]

All companies benefit from the public provisions in the countries where they operate and therefore have the responsibility to pay taxes in each of these countries and to be open about their tax payments. Yet, a lot of international operating financial institutions, companies and rich individuals benefit from international differences in tax percentages and loopholes in national tax legislation by shifting profits across the globe to significantly reduce their overall tax burden (tax planning). To hide this tax planning behaviour, multinational enterprises (MNEs) often lack transparency on their tax payments to the governments of the different countries they operate in.[284]

Large companies, especially MNEs, and rich individuals, often make use of shell companies in tax havens that are not only known for their low tax rates but also for their lack of financial transparency. How much tax is ultimately paid, and in which country, quickly eludes everybody when profits are shifted to such tax havens. A lot of international financial institutions have branches in tax havens to help their clients with their tax planning practices *and* to limit their own tax payments. If these type of constructions violate the laws of a certain country these practices are labelled as *tax evasion*. But even if this is not the case - when they are labelled as *tax avoidance* - this type of behaviour is contrary to *Corporate Social Responsibility* principles: it is socially irresponsible to deprive governments of the revenues they need to develop their country socially and economically.[285]

In a report released in November 2024, the Tax Justice Network (TJN) estimated that countries are losing over USD 492 billion in tax each year to multinational corporations and wealthy individuals using tax havens to underpay tax. Higher income countries lose taxes equivalent to around 7% of their public health budget. For lower income countries, that loss is five times bigger, at around 36%.[286]

Tax is not directly addressed in the SDGs, however there are many goals that cannot be achieved without effective and corruption-free tax policies and practices. For example SDG 16: Peace, Justice and Strong Institutions focuses on reducing corruption and bribery in all forms. This would also mean transparent and just tax practices for companies.[287] SDG 17: Partnerships for the Goals encourages strengthening of domestic resource mobilization, including through international support to developing countries to improve domestic capacity for tax and other revenue collection. Additionally, SDG 1: No Poverty and SDG 10: Reduced Inequalities cannot be achieved without the tax revenues paid by companies as they are essential to finance public provisions.[288]

One can expect from responsibly operating financial institutions that they do not deliberately assist corporate and private clients in avoiding taxes and that they do not avoid taxes themselves. Moreover, financial institutions have the responsibility to only grant financial services to companies that pay the taxes owed in the countries where they operate. When developing policies on taxes, financial institutions can make use of the international standards described below.

2.7.3 International standards and initiatives

The main international standards on tax are summarised per topic, followed by the assessment elements that are formulated by the FFGI Methodology as a result:

- **Harmful tax practices by governments**

  Countries with harmful tax practices – often referred to as "tax havens" - try to attract financial flows (dividends, interest payments, royalties) by offering fiscal advantages to certain groups of companies.[289] These measures enable multinational corporations and individuals to escape the rule of law in the countries where they operate and live, and to pay less tax than they should in those countries. The term "secrecy jurisdiction" is sometimes used instead of "tax haven" to refer to jurisdictions that specialise in enabling individuals to hide their wealth and financial affairs from the rule of law, more than in enabling multinational corporations to shift tax out of the countries where they operate in order to pay less tax.[290]

  Several international initiatives have tried to address tax avoidance via tax havens. The Organisation for Economic Co-operation and Development (OECD) monitors countries within the Global Forum on Transparency and Exchange of Information for Tax Purposes. To this effect, OECD and non-OECD countries cooperate in the implementation of internationally accepted standards for taxes.[291] However, even though almost all countries have now complied with these standards this has done little to stop tax avoidance and evasion – demonstrating the inadequacy of the measure. Civil society organisations have outlined the severe weaknesses of the Global Forum process and called for a more inclusive process under the auspices of the UN.[292]

  Even worse than the OECD is the EU so-called Common EU list of third country jurisdictions for tax purposes. This blacklist of tax havens is updated several times per year. However, it excludes all European tax havens as well as all other major tax havens, and thus is accused of being a whitewash of European tax havens rather than a blacklist.[293]

  More comprehensive is the Corporate Tax Haven Index of Tax Justice Network (TJN), which ranks the jurisdictions most complicit in helping multinational corporations underpay corporate income tax. The Corporate Tax Haven Index thoroughly evaluates each jurisdiction's tax and financial systems to create a clear picture of the world's greatest enablers of global corporate tax abuse, and to highlight the laws and policies that policymakers can amend to reduce their jurisdiction's enabling of corporate tax abuse. The Corporate Tax Haven Index shows that the most harmful tax havens are some of the world's biggest economies and the dependent territories that fall under their control.

  While the Corporate Tax Haven Index focuses on tax avoidance by corporations, TJN also publishes the Financial Secrecy Index, which ranks the jurisdictions most complicit in helping individuals to hide their finances from the rule of law. Financial secrecy facilitates tax abuse, enables money laundering and undermines the human rights of all. The index identifies the world's biggest suppliers of financial secrecy and spotlights the laws that governments can change to reduce their contribution to financial secrecy.

  For the purposes of the FFG methodology, jurisdictions with harmful tax practices refer to the countries on the Financial Secrecy Index and Corporate Tax Haven Index of the Tax Justice Network, plus any additional countries listed in the latest update of the OECD Forum on Harmful Tax Practices as having (potentially) harmful tax practices.

Under the guidance of the OECD and the G20, many countries have been working for years in the programme on Base Erosion and Profit Shifting (BEPS) to eliminate harmful tax practices. In October 2021 an important step was set when an agreement on a Global Minimum Tax (GMT) was adopted by 135 jurisdictions. The GMT should ensure that MNEs with revenues above EUR 750 million are subject to a 15% effective minimum tax rate wherever they operate.[294] According to the OECD, many jurisdictions have taken steps towards the implementation of the global minimum tax from the beginning of 2024.[295]

Many developing countries and civil society organisations object, however, to the leading role of industrialized countries, via the OECD and the G20, in the fight against harmful tax practices. Developing countries are the most affected by corporate tax abuse, but they are often left out of global tax rules decision-making. Therefore, in November 2022, the United Nations' General Assembly voted in favour of a proposal by the 54 African Union member states to give the United Nations the mandate "to monitor, evaluate and decide global tax rules" by developing an international tax convention.[296]

In November 2024, a big majority of countries voted in favour of the adoption of a UN General Assembly Resolution which formally kicks off, as of 2025, the negotiations for a United Nations Framework Convention on International Tax Cooperation (UNFCITC). Over the next two and a half years, delegates will work together to set new rules and standards relating to both corporate and individual taxation, and to design a new framework body that will house future 'Conferences of the Parties' in order to address new tax challenges as they arise in future. Only nine countries opposed the proposal: the United Kingdom, the United States, Argentina, Australia, Canada, Israel, Japan, New Zealand and South Korea.[297]

This leads to assessment elements	
1	For at least 75% of the countries in which the financial institution operates and/or 75% of its total revenue, it reports country-by-country on its revenues, profit, FTEs, subsidies received from governments and tax payments to governments in a way that matches with the consolidated accounts.
5	The financial institution does not have subsidiaries, branches or associates in jurisdictions with no or zero corporate tax or in jurisdictions with harmful corporate tax practices, unless they have substance and their profits are generated from local economic activities.
6	The financial institution does not provide financial services to companies in tax havens, unless the company has substance and its profits are generated from local economic activities.
7	Companies publish their full group structure, including indirectly and jointly-owned entities.
8	Companies publish an explanation of the activities, functions and ultimate shareholder of every subsidiary, branch, joint venture or affiliate located in jurisdictions with no or zero corporate tax practices or in jurisdictions with harmful corporate tax practices.

- **Tax disputes**

  If a company is involved in an adjudication or arbitration case regarding a tax dispute, it should publish information on this dispute, Christian Aid, Oxfam and ActionAid argue: "Resolving unsettled disputes between corporate taxpayers and tax authorities increasingly happens outside court settings, particularly where it involves more than one tax authority and the taxpayer invokes the growing number of arbitration clauses in tax treaties. While there may be advantages to arbitration, as with tax settlements, a key challenge it presents is a potential lack of accountability about how both taxpayer and tax authorities have behaved over disputes often involving millions of dollars of tax revenues (especially in the case of transfer pricing disputes). A voluntary commitment to publishing the results of arbitration, where it is used as an alternative to court, would compensate for this potential accountability deficit and help to build the reputation of a company among its stakeholders as a transparent and responsible taxpayer".[298]

This leads to assessment elements	
12	Companies make public, to the extent legally and practically possible, the decision of any adjudication or arbitration to which it, or any of its subsidiaries, is a party, undertaken to resolve a tax dispute, whether in a court or in an arbitration setting.
13	Companies have a management system which results in immediate actions if suspicions arise that employees or suppliers are guilty of facilitating tax avoidance or evasion.

- **Tax planning by multinational companies**

The OECD Guidelines for Multinational Enterprises expect companies to have a responsible tax policy. On taxes, the guidelines mention that "It is important that enterprises contribute to the public finances of host countries by making timely payment of their tax liabilities. In particular, enterprises should comply with both the letter and spirit of the tax laws and regulations of the countries in which they operate. Complying with the spirit of the law means discerning and following the intention of the legislature."[299]

In 2015 the UN PRI has drafted an Engagement Guidance on Corporate Tax Responsibility, providing guidance to investors on why and how to engage with investees involved in tax planning. The UN PRI argues tax planning risks for investors can be severe and cover a large number of portfolio companies. Aggressive corporate tax planning can:[300]

- create earnings risk and lead to governance problems;
- damage reputation and brand value;
- cause macroeconomic and societal distortions.

Investors can also use the Investor Guide: Integration of tax in responsible investment of VBDO and PwC to design and implement a responsible tax strategy. The report urges investors to apply their own tax principles to investee companies as well.

In June 2017 the European Commission proposed new transparency rules for intermediaries that design or sell potentially harmful tax schemes: "Intermediaries will have to report any cross-border arrangement that contains […] characteristics, which might indicate that the arrangement is set up to avoid paying taxes".[301] The characteristics are listed in the Council Directive amending Directive 2011/16/EU as regards mandatory automatic exchange of information in the field of taxation in relation to reportable cross-border arrangements.

A 2018 report by the Financial Accountability and Corporate Transparency Coalition (FACT) found that disclosure practices and requirements have not kept pace with the growing role of international tax strategies for multinational companies. This increasingly puts investors at risk, since the lack of proper disclosure hampers their ability to "(1) accurately determine a company's value, or (2) appropriately assess risks of, among other things, government enforcement actions, (…) high-risk strategies employed by company management, or reputational damage arising from growing societal and political focus on these issues".[302]

In another recent report the FACT calls for more uniform disclosures and further stresses the importance of public country-by-country reporting (PCbCR). "Investors would gain meaningful insights into risks relating to free cash flow, corporate governance and operational practices, and geopolitical concerns, among other benefits."[303]

This leads to assessment elements	
5	The financial institution does not have subsidiaries, branches or associates in jurisdictions with no or zero corporate tax or in jurisdictions with harmful corporate tax practices, unless they have substance and their profits are generated from local economic activities.

6	The financial institution does not provide financial services to companies in tax havens, unless the company has substance and its profits are generated by from local economic activities.
7	Companies publish their full group structure, including indirectly and jointly-owned entities.
8	Companies publish an explanation of the activities, functions and ultimate shareholder of every subsidiary, branch, joint venture or affiliate located in jurisdictions with no or zero corporate tax practices or in jurisdictions with harmful corporate tax practices.
9	For each country in which companies operate, they report country-by-country on their revenues, profit, FTEs, subsidies received from governments and payments to governments (e.g. withholding taxes, payments for concessions and company tax).
10	Companies focus their international enterprise structure and their international transactions in a way that reflects the economic substance of the activities and transactions undertaken, without any steps made primarily to secure a tax advantage.

- **Tax rulings**

  OECD BEPS Action 5 provides for an international system for exchange of international tax rulings between tax authorities. A framework to transmit rulings to other jurisdictions is not sufficient to be transparent. CSOs argue that "in line with the general principle that tax-responsible companies will be able to justify the key determinants of their tax position to public stakeholders as well as to revenue authorities, a tax-responsible company should be able to publish such rulings".[304]

This leads to assessment elements	
4	The financial institution publishes key information of any company-specific tax ruling it has obtained from tax authorities.
11	Companies publish key information of any company-specific tax ruling they have obtained from tax authorities.

- **Country-by-Country reporting**

  There have been various steps to improve the *Country-by-Country* (CbC) reporting of multinational companies. CbC reporting makes it possible to determine how much taxes and other payments are made by companies to governments and to which extent companies relocate revenues to other countries to avoid or evade tax payment.

  During the G20 conference in Moscow in July 2013 the OECD presented an Action Plan on Base Erosion and Profit Shifting (BEPS), resulting in a 2015 report introducing fifteen guidelines for modernising tax systems and to prevent tax avoidance by multinationals.[305]

  In 2015 the OECD published a Country-By-Country Reporting Implementation Package, containing a model legislation for reporting of country-by-country data on tax, profits, other key financials and employment to tax authorities. These data are considered key to assess tax risks. However, the OECD system involves confidential reporting to a home country tax authority only, followed by exchange of information between tax authorities.

  The EU already adopted the EU Capital Requirements Directive IV (2013/36/EU) in 2013, which applies to credit institutions and investment firms with their residence in one or more of the EU Member States. This obliges financial institutions to provide full Country-by-Country (CbC) reporting on the following topics:[306]

  - name(s), nature of activities and geographical location
  - turnover
  - number of employees on a full time equivalent basis
  - profit or loss before tax
  - tax on profit or loss

- public subsidies received

Some banks also provide other relevant data per country, such as total assets. Oxfam International analysis shows that data on assets per country provides useful additional information. Furthermore, the analysis shows that the country-by-country data are difficult to interpret if they do not match with the consolidated financial accounts.[307]

In December 2021 the EU Public Country-by-Country (CbyC) Reporting Directive entered into force. The directive requires multinational enterprise groups with global revenues exceeding EUR 750 million to publish, starting in year 2026, how much corporate tax they pay in each Member State as well as in non-cooperative jurisdictions for tax purposes. The reports will include contextual information per country in addition to the amount of corporate income tax, such as the nature of activities, the list of subsidiaries, turnover, number of employees, retained earnings, and profit before tax. Enterprises will also have to disclose similar information, globally, on the basis of the business they conduct outside the EU. These reports will be made available to citizens on the enterprise's web site and from the national Business Registers.

The GRI 207: Tax 2019 standard of the Global Reporting Initiative includes a specific *Disclosure 207-4 on Country-by-country reporting*. This disclosure requires companies to disclose for each jurisdiction they are active in:[308]

1. Names of the resident entities;
2. Primary activities of the organisation;
3. Number of employees, and the basis of calculation of this number;
4. Revenues from third-party sales;
5. Revenues from intra-group transactions with other tax jurisdictions;
6. Profit/loss before tax;
7. Tangible assets other than cash and cash equivalents;
8. Corporate income tax paid on a cash basis;
9. Corporate income tax accrued on profit/loss;
10. Reasons for the difference between corporate income tax accrued on profit/loss and the tax due if the statutory tax rate is applied to profit/loss before tax.

This leads to assessment elements	
1	For at least three quarters of the countries in which the financial institution operates, it reports country-by-country on its revenues, profit, FTEs, subsidies received from governments and tax payments to governments in a way that matches with the consolidated accounts.
2	For each country in which the financial institution operates, it reports country-by-country on its revenues, profit, FTEs, subsidies received from governments and tax payments to governments in a way that matches with the consolidated accounts.
3	For each country in which the financial institution operates, it reports country-by-country on its total assets in a way that matches with the consolidated accounts.
7	Companies publish their full group structure, including indirectly and jointly-owned entities.
8	Companies publish an explanation of the activities, functions and ultimate shareholder of every subsidiary, branch, joint venture or affiliate located in jurisdictions with no or zero corporate tax practices or in jurisdictions with harmful corporate tax practices.
9	For each country in which companies operate, they report country-by-country on their revenues, profit, FTEs, subsidies received from governments and payments to governments (e.g. withholding taxes, payments for concessions and company tax).

- **Procurement and supply chains**

Companies are often part of long procurement and supply chains. They can monitor one another and question how they respect local and national legislation and international norms on tax. The requirements that companies set for their suppliers can be included in contractual agreements.

The importance of this is also recognised in the OECD Guidelines for Multinational Enterprises. The OECD Due Diligence Guidance for Responsible Business Conduct provides practical support to companies on the implementation of the OECD Guidelines for Multinational Enterprises by providing plain language explanations of its due diligence recommendations. Implementing these recommendations can help companies avoid and address adverse impacts that may be associated with their operations, supply chains and other business relationships.

Also ISO 26000:2010 Guidance on social responsibility recognises the importance of supply chain responsibility, because "the impacts of an organisation's decisions or activities can be greatly affected by its relationships with other organisations".[309] A company's sphere of influence includes relationships within and beyond an organisation's supply chain. Moreover, ISO 26000:2010 Guidance on social responsibility recommends setting contractual provisions or incentives as a means of exercising influence.[310]

In addition, ISO 20400:2017 Sustainable procurement – Guidance provides guidelines for organisations, independent of their activity or size, on integrating sustainability within procurement, as described in ISO 26000:2010 Guidance on social responsibility. It is intended for stakeholders involved in, or impacted by, procurement decisions and processes.

This leads to assessment elements	
14	Companies integrate criteria on tax in their procurement policies and operational policies.
15	Companies include clauses on the compliance with criteria on tax in their contracts with subcontractors and suppliers.

2.8 Animal welfare

2.8.1 Assessment elements

Financial institutions can influence the welfare of animals if they finance or invest in industries where animals are used, captured and/or (re)produced, such as fishery, livestock farming, the pharmaceutical industry, and other companies with an animal testing facility like the cosmetics industry, the recreation industry, the fur industry, and pet breeding.

The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:

1. Companies respect animal welfare in all Five Domains of animal welfare.
2. Non-medical animal testing (including but not limited to cosmetics testing) is unacceptable.
3. Requirements are set for the use of laboratory animals for testing medical products in order to limit animal suffering and the number of animals used as much as possible and demonstrably look for alternatives to animal testing (the so-called 3R-strategy).
4. Producing, manufacturing, trading, and selling fur and exotic leather (and derived products) is unacceptable.
5. Severely restricted housing methods for farm animals, including calves in crates, hens in battery cages and sows in feeding cubicles, are unacceptable.
6. Farm animal breeding practices and genetics are geared towards good welfare in line with the FARMS Responsible Minimum Standards or equivalent international standards referenced herein.
7. Animal protein companies are certified according to the criteria of certification schemes that include animal welfare requirements (mentioned in section 2.8.3 of the FFGI Methodology).
8. Companies safeguard adequate environmental enrichment and quality for farm animals in line with the FARMS Responsible Minimum Standards or equivalent international standards referenced herein.
9. Companies avoid painful procedures for farm animals in line with the FARMS Responsible Minimum Standards or equivalent international standards referenced herein.
10. Companies practice humane slaughter methods for farm animals in line with the FARMS Responsible Minimum Standards or equivalent international standards referenced herein.
11. Companies limit the duration of animal transports in line with the FARMS Responsible Minimum Standards or equivalent international standards referenced herein.
12. Companies contribute to an ambitious, time-bound shift from animal protein to plant and alternative proteins in order to decrease animal protein consumption.
13. Entertainment activities in which wild animals are involved or animals are hurt (including circuses and other entertainment shows with wild animals, dolphinariums, elephant rides, fighting games with animals) are unacceptable.
14. Companies integrate animal welfare criteria into their procurement and operational policies.
15. Companies include clauses on the compliance with criteria on animal welfare in their contracts with subcontractors and suppliers.

2.8.2 What is at stake?

Animals are sentient beings that deserve respect and protection. Animal protection organisations advocate measures to protect the welfare of animals based on this fundamental principle. These efforts are met with growing interest from governments and companies. As per the Amsterdam Treaty (1997) and the Lisbon Treaty (2007), the European Union officially recognizes animals as sentient beings. The plea of animal protection organisations also resonates among European civilians, as indicated by the Eurobarometer.[311]

The welfare of animals is also important for the wellbeing and the health of large groups of people. About one billion people depend on the health and productivity of the animals they work with for their income, food, and clothing.[312] According to the UN Food and Agriculture Organisation (FAO), animal welfare is related to food security, food safety, health, sustainability, working conditions, rural developments, gender equality and social justice.[313]

Animal welfare issues are most prevalent in the intensive livestock farming sector. Intensive livestock farming (or factory farming) is a landless farming system where animals are typically kept inside, feed is delivered to the farm and manure has to be removed from the farm. Over the years, this system has been optimised to minimise costs and maximise profits at the risk of major environmental and health concerns.[314] More than 70% of the world's farm animals were raised in intensive livestock farming systems.[315] Such farming methods are commonly associated with poor animal welfare, since the animals are kept in conditions that interfere with their ability to express their natural behaviour. Animal welfare issues related to intensive livestock farming differ per country and per species, but commonly include:[316]

- High stocking densities;
- Severely restrictive housing methods, such as cages, crates, or feeding cubicles;
- Inadequate environments with poor air quality, inappropriate floors and a lack of environmental stimulus;
- Un- anaesthetised surgery, such as cutting tails, clipping beaks, teeth filing, or dehorning;
- Selective breeding practices that may be detrimental to the animals' health and wellbeing;
- Poor conditions during animal transport, especially long duration, shortage of food, water and space, and bad handling during loading and offloading procedures, resulting in exhaustion, dehydration, anxiety, injury, disease and even death of the animals involved; and
- Problematic slaughtering methods, such as CO_2-stunning for pigs, electrical stunning for poultry via the water bath method and un-stunned slaughter.

Due to population growth and changing consumption patterns in emerging markets the worldwide demand for livestock products - meat, dairy products, eggs - is increasing rapidly. To meet this demand in a way that pays attention to animal welfare standards is a major challenge.[317] Further intensification of livestock production will almost certainly result in the suffering of even more animals.[318]

In contrast to other major forms of livestock agriculture, there is a paucity of scientific information on the welfare of fish raised under intensive aquaculture conditions. This reflects an adherence to the belief that these animals have not evolved the salient biological characteristics that are hypothesised to permit sentience. However, there is scientific evidence for the existence of sentience in fish, and in particular, their ability to experience pain, fear, and psychological stress. Anatomical, pharmacological, and behavioural data suggest that affective states of pain, fear and stress are likely to be experienced by fish in similar ways as in other animals. This means that fish have the capacity to suffer, and that welfare considerations for farmed fish should take these states of pain into account.[319]

Outside industrial livestock farming, other sectors are also characterised by animal welfare issues:

- **Use of laboratory animals:**

  The pharmaceutical and cosmetics industries, as well as scientific institutions, regularly make use of laboratory animals. The animals are used for the development of medicines and vaccines, for studying animals' and humans' bodily functions, and for testing the safety of various types of chemicals. Depending on the context, animals may be exposed to various kinds of suffering, even as the exact need, effectiveness and justification for animal testing is debated.[320]

- **Fur and exotic leather**

  The production of and trade in fur and exotic leathers is associated with enormous negative impacts on animal welfare, as well as considerable environmental impacts. In addition, the production of fur animals in industrial farming settings has proved a considerable public health risk during the COVID-19 pandemic, when fur farms played a role in the spread and mutation of the SARS-CoV-2 virus.

- **Animals for recreation and entertainment**

  In the recreation industry, animals are deployed for sports and entertainment: equestrianism, circuses, zoos, and tourist attractions like elephant riding and shows with birds of prey. Finally, in pleasure pursuits such as hunting, hunting tourism, as well as in fishing and fighting games with pets, the welfare of animals is profoundly at stake.[321]

The investment and finance policies of financial institutions should take the welfare of animals into account when investing in or financing companies in all the industries mentioned (livestock, fur and exotic leather, pharmaceutics, cosmetics, recreation, sports, and entertainment). This obligation follows from the recognition that animals are sentient beings capable of feeling pain and stress. Furthermore, neglecting the welfare of animals may also have consequences for human health and the environment. When developing policies in this respect, financial institutions can make use of the international standards described in the following section.

2.8.3 International standards and initiatives

Standards concerning animal welfare differ in scope, application, and the level of protection they offer. It is possible to differentiate between generally accepted principles, international standards, EU legislation, national law and (inter)national private standards. The main standards on animal welfare are summarised per topic, followed by assessment elements which are formulated by the FFGI Methodology as a result:

- **General animal welfare standards**

  The Five Freedoms are often taken as a principle for preparing standards on animal welfare. This concept arose from the Brambell Report published in Great Britain in 1965 and the following request of the UK Minister of Agriculture to the Farm Animal Welfare Council (FAWC) to revise the *Welfare Codes* for cattle, pigs, domestic fowl, and turkeys. This has led to the following list of five freedoms that are relevant for all animals.

  An animal has to live free from:

  - Hunger, thirst, and malnutrition (direct access to fresh water and solid food to stay healthy and strong).
  - Any thermal or physical discomfort (having suitable, comfortable housing that offers tranquillity).
  - Pain, injury, and diseases (by means of prevention or diagnosing and treating quickly).
  - Fear and chronic stress (by circumstances that avoid suffering and stress).
  - The denial of natural (species-specific) behaviour (by supplying sufficient space, sufficient and proper provisions, and company from animals of the same species).

  To improve on the Five Freedoms model, scientists and animal welfare organisations have since 1994 proposed another framework: the Five Domains of Animal Welfare. This model moves away from the idea that animal welfare can be adequately guaranteed merely by the absence of negative states. Instead, the Five Domains model focuses on the different factors that can positively or negatively affect animals' mental state. The Five Domains are:

- Nutrition;
- Environment;
- Health;
- Behaviour; and
- Mental state.

In a protocol at the Amsterdam Treaty (1997), the European Union officially recognises animals as sentient beings and indicates that European civilians and institutions in the field of agriculture, fishery and science have to take the welfare of animals into account. This protocol has also been fully included as Article 6b in the successor of the Amsterdam Treaty, the Lisbon Treaty (2007), which came into force on December 1, 2009.

The World Trade Organisation (WTO) Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement) encourages its members to base their sanitary measures on international standards, guidelines and recommendations, where they exist.

The World Organisation for Animal Health (OIE) is the WTO reference organisation for standards relating to animal health and zoonoses. Its standards are intended to safeguard the hygienic safety in the trade in animals and animal products. The Terrestrial Animal Health Code, first published in 1968, and the Aquatic Animal Health Code, published in 1995, aim to assure the sanitary safety of international trade in terrestrial animals and aquatic animals, and their products. The Codes traditionally addressed animal health and zoonoses, but have in recent years expanded to cover other animal welfare aspects, mainly with respect to transport, slaughter, and killing animals to prevent the spread of diseases and stray animals. This is consistent with the expanded mandate of the OIE which is 'to improve animal health worldwide'. The OIEs Manual of Diagnostic Tests and Vaccines for Terrestrial Animals and Manual of Diagnostic Tests for Aquatic Animals provide a harmonised approach to disease diagnosis by describing internationally agreed laboratory diagnostic techniques.

ISO 26000:2010 Guidance on social responsibility recognises the importance of animal welfare in the principle 'Ethical behaviour'. The underlying values - fairness, justice, and integrity - imply caring for people, animals, and the environment. Ethical behaviour encompasses respecting the welfare of animals, including providing effective resolutions if an organisation affects the life and the existence of animals.[322]

This leads to assessment elements	
1	Companies respect animal welfare in all Five Domains of animal welfare.
14	Companies integrate animal welfare criteria into their procurement and operational policies.
15	Companies include clauses on the compliance with criteria on animal welfare in their contracts with subcontractors and suppliers.

- **Laboratory animals**

The Council of Europe's Convention for the protection of vertebrate animals for experimental and other scientific purposes concerns the use of animals in experiments.[i] There is also European Union legislation on the housing of, and caring for laboratory animals and there are rules for assessing animal tests. EU Regulation 1223/2009 bans animal testing for cosmetics and the use of great apes for testing purposes.

This leads to assessment element

[i] The Council of Europe (CoE) is not to be confused with the European Council (EC) or the Council of the European Union. The CoE is a distinct, consultative body outside of the European Union in which 46 countries participate, and has no binding legislative powers. The latter are integral parts of the European Union's institutional structure.

2	Non-medical animal testing (including but not limited to cosmetics testing) is unacceptable.

When planning and conducting animal experiments, one can strive for improvement as described already in 1959 by the researchers W.M.S. Russel and R.L. Burch, in their 3R-strategy *Replacement, Reduction and Refinement*. This suggests to apply three strategies with regard to animal testing: [323]

- Replacement: laboratory animals are replaced by non-animal alternative test objects as much as possible.
- Reduction: the number of animals used is reduced as much as possible.
- Refinement: discomfort (pain/inconvenience) of laboratory animals is prevented as much as possible, both prior to, as well as after testing.

Directive 2010/63/EU of 2010 "spells out the principle of the 'Three Rs' and makes it a firm legal requirement. The principles of Replacement, Reduction and Refinement must be considered systematically at all times when animals are used for scientific purposes in the EU".[324]

This leads to assessment element	
3	Requirements are set for the use of laboratory animals for testing medical products in order to limit animal suffering and the number of animals used as much as possible and demonstrably look for alternatives to animal testing (the so-called 3R-strategy).

- **Fur and exotic leather**

  Within the European Union, there are rules for the use of traps to catch animals for their fur (Council Regulation 3254/91/EEC). There is a ban on the trade in cat and dog fur (Regulation 1523/2007/EC) and an import ban on seal fur (Council Directive 83/129/EEC and Regulation 1007/2009/EC).

  In many countries, the farming of animals purely for fur production has already been prohibited, or phase-out plans are in place.[325] This trend accelerated during the COVID-19 pandemic when the Sars-COV-2 virus frequently infected fur farms, leading to the risk of further mutations.

This leads to assessment element	
4	Producing, manufacturing, trading and selling fur and exotic leather (and derived products) is unacceptable

- **Farm animals**

  The Farm Animal Responsible Minimum Standards (FARMS) were developed in 2019 by a coalition of animal welfare organisations, and emphasize the role of financial institutions in advancing animal welfare in farm animals. Based on the Five Freedoms concept, the OIE Terrestrial Health Code, existing EU legislation and the IFC Good Practice Note, the FARMS initiative identifies a number of 'welfare risks' and mitigation strategies that apply to all farm animals, covering a range of topics including:

  - Living space;
  - Stocking density;
  - Living environment and enrichment;
  - Diet;
  - Breeding practices;
  - Painful procedures;
  - Transport; and
  - Slaughter.

Additionally, the FARMS initiative defines a host of minimum standards specific to five of the most commonly farmed animals (dairy cows, beef cattle, broiler chickens, laying hens and pigs).[326] By combining previous governmental regulations and private initiatives, the Responsible Minimum Standards (RMS) provide a comprehensive set of principles for improving welfare in farm animals.

The Business Benchmark on Farm Animal Welfare is an annual benchmark of food companies' performance on farm animal welfare, supported by World Animal Protection (WAP), Compassion in World Farming (CIWF) and private equity firm Coller Capital. "Its aims are:[327]

- To provide investors with the information they need to understand the business implications of farm animal welfare for the companies in which they are invested.
- To provide investors, governments, academics, CSOs, consumers and other stakeholders with an independent, impartial, and reliable assessment of individual company efforts to adopt higher farm animal welfare standards and practices.
- To provide guidance to companies interested in improving their management and reporting on farm animal welfare issues.

The benchmark assesses food producers, restaurants and bars and food retailers and wholesalers, covering the entire food supply chain".

Coller Capital also initiated the Farm Animal Investment Risk and Return (FAIRR) initiative, which aims to improve investor's understanding of risks related to factory farming. FAIRR states that "animal factory farming is exposed to at least twenty-eight environmental, social and governance issues that could significantly damage financial value over the short or long-term. Many of these risks are currently hidden from investors".[328]

The *International Federation of Organic Agricultural Movements* (IFOAM) has developed the Norms for Organic Production and Processing. The IFOAM norms consist of the IFOAM Standard and the corresponding Accreditation Criteria. All producers worldwide adhering to the IFOAM norms are included in the Organic Guarantee System. With respect to animal welfare, the certification standard includes detailed requirements for housing, freedom of movement, feed, pest and disease management, transport, and slaughter.

The Humane Farm Animal Care (HFAC) Welfare Standards are a comprehensive set of guidelines designed to ensure the humane treatment of farm animals in food production. These standards are the foundation of the Certified Humane® program, a certification that allows consumers to identify products from farms and facilities meeting high standards of animal welfare. HFAC is an independent, non-profit organization established in 2003 to improve the lives of farm animals by setting rigorous welfare standards, conducting inspections, and certifying humane farming practices.

The RSPCA Welfare Standards are guidelines developed by the UK Royal Society for the Prevention of Cruelty to Animals (RSPCA) to ensure the humane treatment of farm animals across various stages of production. These standards are part of the RSPCA's broader mission to improve animal welfare and provide a framework for farmers and producers to raise animals ethically. Products meeting these standards are eligible to carry the RSPCA Assured certification label.

The Animal Welfare Approved (AWA) Standards by A Greener World (AGW) are a rigorous set of guidelines for ensuring the highest animal welfare practices on farms. The AWA certification promotes the humane treatment of animals, sustainable farming practices, and transparency in food production. The standards also cover all major farmed livestock and poultry.

The *Sustainable Agriculture Network* (SAN) has published the Sustainable Agriculture Standards. The norms are based on guidelines of, among others, the United Nations, the

European Union, and the International Labour Organisation and comprise of ten criteria for sustainable agriculture, of which one is about dealing with wild animals on farms.

The Beter Leven certification is a widely recognized animal welfare labelling system in the Netherlands, established by the Dutch Society for the Protection of Animals (Dierenbescherming). It evaluates and promotes animal welfare in food production, using a three-star rating system. Levels 2 and 3 stars represent progressively higher welfare standards, with 3 stars indicating the highest achievable level.

The Global Animal Partnership (GAP) has defined animal welfare in order to improve farming and ranching systems and practices. Under its GAP 5-Step Animal Welfare Rating Program it has customized standards for each species, including beef cattle, broiler chickens, turkey, sheep, pigs, goats, bison and laying hens. As part of its program for broilers chickens, GAP aims to replace fast-growing chicken breeds by 2024.

The Council of Europe has also adopted several conventions to protect farm animals. In the European Convention for the Protection of Animals kept for Farming Purposes (adopted in 1976 and amended in 1992) minimum guidelines for livestock farming with respect to welfare have been included. In addition, conventions on transport (ETS No. 193) and on slaughter (ETS No. 102) have been adopted. These conventions are further elaborated in specific rules for certain animal species and topics.

Within the European Union, Council Directive 98/58/EC concerning the protection of animals applies to all farm animals and lays out several general animal welfare requirements with respect to, amongst others, freedom of movement, accommodation, feed and breeding practices. Furthermore, directives from the Council have been adopted on animal transport (EC No 1/2005), as well as on the keeping of specific species of animals (broilers, laying hens, pigs, calves). Regulations on slaughter (EU Regulation 2018/723) have also been issued by the European Commission.

As part of the Farm to Fork Strategy, the European Commission announced revisions to various animal welfare legislations. The revisions are intended to align the legislation with the latest scientific evidence, potentially resulting in stricter rules on animal farming, testing, and transportation.[329] Financial institutions will have to evaluate their investments in these areas for compliance with the updated welfare standards.

In December 2023, the Commission adopted the legislative proposal to revise the regulation on the protection of animals during transport. The proposed measures will improve the well-being of 1.6 billion animals transported across borders in the EU. Work is still ongoing on other planned revisions including the welfare of animals at the farm level, the protection of animals at the time of killing and establishing new EU rules on animal welfare labelling.[330]

In the long run, some abuses in intensive livestock farming are phased out in the European Union, such as keeping calves in crates (prohibited since 2007), hens in bare battery cages (prohibited as of 2012) and keeping sows in feeding cubicles (prohibited as of 2013).[331] No specific EU legislation exists for widely farmed animals such as dairy cows, rabbits, ducks, turkeys, trout, and salmon.

This leads to assessment elements	
5	Severely restricted housing methods for farm animals, including calves in crates, hens in battery cages and sows in feeding cubicles, are unacceptable.
6	Farm animal breeding practices and genetics are geared towards good welfare in line with the FARMS Responsible Minimum Standard or equivalent international standards referenced herein.
8	Companies safeguard adequate environmental enrichment and quality for farm animals in line with the FARMS Responsible Minimum Standards or equivalent international standards referenced herein.

This leads to assessment elements	
9	Companies avoid painful procedures for farm animals in line with the FARMS Responsible Minimum Standards or equivalent international standards referenced herein.
10	Companies practice humane slaughter methods for farm animals in line with the FARMS Responsible Minimum Standards or equivalent international standards referenced herein.
11	Companies limit the duration of animal transports in line with the FARMS Responsible Minimum Standards.

- **Animal welfare certification**

  The *International Federation of Organic Agricultural Movements* (IFOAM) has developed the Norms for Organic Production and Processing. The IFOAM norms consist of the IFOAM Standard and the corresponding Accreditation Criteria. All producers worldwide adhering to the IFOAM norms are included in the Organic Guarantee System. With respect to animal welfare, the certification standard includes detailed requirements for housing, freedom of movement, feed, pest and disease management, transport, and slaughter.

  The European Union regulation on organic production sets specific rules for organic production, which include animal welfare requirements regarding housing conditions, husbandry practices, stocking densities, access to open air and animal health.[332]

  The Global Aquaculture Alliance (GAA), an initiative from a number of American companies, has developed the Best Aquaculture Practices (BAP) facility certification standards, monitored and controlled by ISO 65-accredited certification bodies. BAP certification defines the most important elements of responsible aquaculture and provides quantitative guidelines by which to evaluate adherence to those practices for processing plants, farms, hatcheries, and feed mills. The BAP includes standards for shrimp, tilapia, and channel catfish cultivation, as well as for the fish processing industries. A number of animal welfare criteria are included in the BAP, particularly regarding pain and anxiety. The number of BAP-certified facilities worldwide grows daily. BAP is mainly active in the Americas, South East Asia, Australia and New Zealand; within Europe only in Iceland, Norway and the United Kingdom.

  In 2010, WWF and IDH (Dutch Sustainable Trade Initiative) founded the Aquaculture Stewardship Council (ASC). The ASC aims to be the world's leading certification and labelling programme for responsibly farmed seafood, by managing the global standards for responsible aquaculture, which were developed by the WWF Aquaculture Dialogues.

  ASC collaborates with aquaculture producers, seafood processors, retail and foodservice companies, scientists, conservation groups and consumers in order to:[333]

  - "Recognise and reward responsible aquaculture through the ASC aquaculture certification programme and seafood label;
  - Promote best environmental and social choice when buying seafood; and
  - Contribute to transforming seafood markets towards sustainability."

This leads to assessment element	
7	Animal protein companies are certified according to the criteria of certification schemes that include animal welfare requirements (mentioned in section 2.8.3 of the FFGI Methodology).

- **Antimicrobial resistance**

  According to the World Health Organisation (WHO), antimicrobial resistance (AMR) is one of the biggest threats to global health, food security, and development today. As antibiotics become less effective a growing list of infections are becoming difficult and sometimes impossible to treat. Because the routine use of antibiotics is instrumental for livestock being reared in densely packed and often unhygienic conditions, a change in animal housing and husbandry practices is necessary to effectively eliminate or reduce the use of antibiotics.[334]

Relevant international standards and assessment elements are included in the theme Health (section 2.9).

- **Protein transition**

  A transition away from animal protein towards plant-based and alternate sources of protein is essential from a health, human rights, climate, and animal welfare perspective. The CH_4 produced by animals and N_2O emissions from animal manure and fertilizers are important sources of GHG emissions globally. The significantly higher global warming potential of CH_4 compared to CO_2 makes the reduction of industrial livestock production particularly critical.[335] The production of feed for animal factory farming is associated with massive deforestation.

This leads to assessment element	
4	Companies contribute to an ambitious, time-bound shift from animal protein to plant and alternative proteins in order to decrease animal protein consumption.

- **Animals in entertainment**

  According to animal protection organisations, circuses and dolphinariums that deploy animals for entertainment purposes do not meet the Five Freedoms criteria. Animals are unable to express their natural behaviour and suffer fear and chronic stress. Moreover, often use is made of animals that were captured in the wild. According to animal protection organisations, such activities are unacceptable.[336]

  Various countries have implemented legislation to prohibit the use of (wild) animals in circuses. Below, we will limit the information to the countries currently represented in the Fair Finance International network:

  - Belgium has a national ban on the use of wild animals in circuses as of March 2014.
  - In Brazil, a national ban on the use of wild animals in circuses was adopted in 2009 by the Commission of Education and Culture. In several districts there is a ban on the use of all kinds of animals in circuses.
  - In the Netherlands, the prohibition of the use of wild animals in circuses is effective from September 15, 2015.
  - In Sweden there is a national ban on the use of certain species of wild animals in circuses, effective from 1994. There is a ban on the use of monkeys, carnivores, rhinos, giraffes, kangaroos, hippos, seals, birds of prey, ostriches, crocodiles, deer, elephants, and sea lions.

This leads to assessment element	
13	Entertainment activities in which wild animals are involved or animals are hurt (including circuses and other entertainment shows with wild animals, dolphinariums, elephant rides, fighting games with animals) are unacceptable.

- **Procurement and supply chains**

  Companies are often part of long production chains. They can monitor one another and question how they respect local and national legislation and international norms on animal welfare. The requirements that companies set for their suppliers can be included in contractual agreements. The importance of animal welfare is recognized in the OECD/FAO Guidance on Responsible Agricultural Supply Chains, which is part of a series of sectoral guidance on the OECD Due Diligence Guidance for Responsible Business Conduct. This provides practical support to companies on the implementation of the OECD Guidelines for Multinational Enterprises by providing plain language explanations of its due diligence recommendations. Implementing these recommendations can help companies avoid and address adverse impacts that may be associated with their operations, supply chains and other business relationships.

ISO 26000:2010 Guidance on social responsibility also acknowledges animal welfare as part of an organisation's responsibility to behave responsibly and connects the topic with multiple core subjects. It also recognises the importance of supply chain responsibility, because "the impacts of an organisation's decisions or activities can be greatly affected by its relationships with other organisations".[337] A company's sphere of influence includes relationships within and beyond an organisation's supply chain. Moreover, ISO 26000:2010 Guidance on social responsibility recommends setting contractual provisions or incentives as a means of exercising influence.[338]

In addition, ISO 20400:2017 Sustainable procurement – Guidance provides guidelines for organisations, independent of their activity or size, on integrating sustainability within procurement, as described in ISO 26000:2010 Guidance on social responsibility. It is intended for stakeholders involved in, or impacted by, procurement decisions and processes.

This leads to assessment elements	
14	Companies integrate animal welfare criteria into their procurement and operational policies.
15	Companies include clauses on the compliance with criteria on animal welfare in their contracts with subcontractors and suppliers.

2.9 Health

2.9.1 Assessment elements

A solid policy on health should ensure that financial institutions only finance or invest in companies that take their responsibility towards health seriously and act based on the precautionary principle. The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:

1. Companies prevent the health of employees, clients, and nearby residents to be deteriorated by their products or production processes (according to the precautionary principle).
2. Companies have a comprehensive health and safety policy.
3. Companies provide appropriate and gender- sensitive uniforms and/or PPE to all workers.
4. Companies respect international agreements on the production and the use of hazardous or toxic substances as described in the Montreal Protocol (on substances that deplete the ozone layer).
5. Companies respect international agreements on the production and the use of hazardous or toxic substances as described in the Stockholm Convention (on POPs).
6. Companies respect international agreements on trade in chemicals and chemical waste as stated in the Basel convention.
7. Companies respect international agreements on trade in chemicals and chemical waste as stated in the Rotterdam convention.
8. Companies reduce the emission of harmful substances (to soil, water, and air) by making use of the best available techniques (BAT).
9. Companies restrict the use of chemicals suspected to be harmful to health in scientific literature and, if necessary, only in a responsible way (precautionary principle).
10. Pharmaceutical companies ensure that patients with avoidable and treatable diseases have the right to access to medication.
11. Companies apply a prudent use of antimicrobial medicines (antibiotics) in human beings and livestock farms in order to minimize antimicrobial resistance.
12. Manufacturers of bottle-feeding comply with the WHO-code and additional resolutions on advertisements for breast-milk substitutes.
13. Tobacco manufacturers comply with the WHO Framework Convention on Tobacco Control and additional resolutions on the protection of current and future generations against the health, social, environmental, and economic consequences of (passive) smoking.
14. Production of tobacco and tobacco-based products is unacceptable.
15. Companies integrate health criteria in their procurement and operational policies.
16. Companies include clauses on the compliance with criteria on health in their contracts with subcontractors and suppliers.

2.9.2 What is at stake?

Good health is of great value, for individuals as well as for economies. The Covid-19 pandemic that started in 2020 revealed both the crucial importance of good health and healthcare systems, as well as the large worldwide inequalities that persist in access to healthcare and medicine. Globally, health care costs are rapidly increasing and for many developing countries these costs are hard to bear.[339] Furthermore, illness or handicap decrease labour productivity and also limits the abilities of individuals to contribute to the society. For this reason it is of great social and economic importance that financial institutions and companies are aware of their impact on health.

The right to health is an acknowledged human right, first formulated in 1946 at the foundation of the World Health Organisation (WHO) as “the enjoyment of the highest attainable standard of health”.[340] The right to health is also recognized in the International Covenant on Economic, Social and Cultural Rights (ICESCR) as “the right to enjoy the highest possible standard of physical and mental health”.[341] The right to health is also mentioned in Article 25 of the Universal Declaration of Human Rights.

The right to health is broader than merely access to healthcare. It includes access to safe drinking water, proper sanitary provisions, safe food, housing, healthy working conditions, education and information on health, and gender equality. In addition, healthcare provisions have to be accessible to everyone both physically as well as economically. This interpretation of the right to health has been endorsed by the WHO, the Office of the High Commissioner of Human Rights (OCHCR) and the Committee on Economic, Social and Cultural Rights (CESCR).[342]

The WHO points out that, while governments must take responsibility for protecting the right to health, companies have a responsibility to do so as well. According to ISO 26000:2010 Guidance on social responsibility, companies should first prevent affecting the health of their employees, clients, and nearby residents with their products and production processes.[343] Furthermore, companies should ensure that their employees and employees of their suppliers are not exposed to hazardous substances, that they do not incur diseases during their work, and that they do not have to work in dangerous circumstances.[344]

According to the International Labour Organisation (ILO), 2.9 million people die every year as a result of occupational accidents or work-related diseases. The number of non-fatal accidents at work, many of these resulting in extended absences from work, is estimated by the ILO at 395 million each year globally.[345]

Unsafe or inadequate water, sanitation, and hygiene are linked to transmission of diseases such as cholera, diarrhoea, and dysentery. Drinking contaminated water causes approximately 485,000 deaths annually. Almost 1 billion people lack access to safe drinking water. Sharp geographic, sociocultural, and economic inequalities persist. Women, children, and the poor are the most severely affected by water quality impacts. Sectors such as agriculture, fishing, and animal husbandry all rely on the presence of sufficient and clean water, while climate change, population growth, demographic changes and urbanization pose challenges for water supply systems. Moreover, by 2025, half of the world’s population will be living in water-stressed areas. Management of all water resources will need to be improved to ensure provision and quality.[346]

Air pollution is a major health problem, with data of the World Health Organisation (WHO) showing that air pollution kills an estimated seven million people worldwide every year.[347] The WHO has emphasized that reduction of emissions of greenhouse gases (GHGs) through better transport, food and energy-use choices can also result in improved health.[348] The harmful health effects of pollution caused by transport have also been recognized by the European Environment Agency. Especially in cities, air quality levels are a fundamental issue for public health.[349] Moreover, air quality is at risk from an increase of peat fires. Haze caused by peat fires can cause serious long-term health problems. The WHO estimates that each year around 110,000 deaths associated with particulate matter exposure in Southeast Asia can be attributed to peat fires.[350]

Globally, tens of thousands of chemical compounds are released into the environment every year. Such chemicals can spread far over land and oceans and may be absorbed by plants, animals, and humans, including through the skin or the mouth. This carries significant risks, because information about consequences for the environment and human health is available for only around 14% of the most widely used chemical compounds.[351] The use of these chemicals often precedes scientific insight into their environmental and health effects, and legislation in turn tends to lag behind the latest scientific insights. This implies a clear responsibility on the part of companies to apply precaution in their use and handling of chemicals. Parties involved must do more than merely comply with the existing rules: as a precautionary measure, the use of any toxic substance of which the consequences are unknown should be avoided. This precautionary principle can be applied widely but certainly must be applied to three specific groups of chemicals:[352]

- *Endocrine Disrupting Chemicals (EDCs)*: these are chemicals such as BPA, phthalates and BFRs, that block, imitate, or otherwise disturb naturally produced hormones. Hormones are the chemical messengers of the body that control how organisms develop and function.
- *Persistent Organic Pollutants (POPs)*: these are chemicals that degrade slowly in nature or do not degrade at all. Once they enter into a human being or animal they accumulate in the body.
- *Per- and Polyfluoroalkyl Substances (PFAS)*: these are chemicals that are also called "forever chemicals" because they are extremely persistent in nature, hardly decompose, and contaminate drinking water, soil or air.[353]

As well as preventing health damage to employees, consumers and nearby residents, companies should consider how they can support access to essential health provisions, clean drinking water and adequate sanitation. Furthermore, it is important to pay attention to improving health, such as stimulating a healthy lifestyle, discouraging the consumption of unhealthy products and substances, and contributing to accessible medication and vaccinations. Special attention should be paid to food for children.[354]

One in every four humans has insufficient access to essential, reliable and affordable health care.[355] According to the Access to Medicine Foundation, better access to medication could save the lives of ten million people that die of avoidable or treatable diseases such as HIV/Aids, malaria and tuberculosis every year.[356] The fight against HIV/Aids, malaria and other diseases is one of the seventeen Sustainable Development Goals (SDGs).[357] Pharmaceutical companies could play an important role in developing vaccines or medication for common tropical diseases, but since people suffering from these diseases do not represent a group with significant purchasing power, investment in that field is severely lagging. Moreover, some pharmaceutical companies tend to stick to their patents as long as possible, which makes it impossible to bring existing medication to the market at an affordable price.[358]

Microorganisms in humans, food and animals continue to show resistance to the most widely used antimicrobials for treatment of amongst others tuberculosis, malaria, HIV, and influenza. Antimicrobial resistant-microbes are found in people, animals, food, and the environment (in water, soil and air) and they can spread between people and animals.[359] In Europe, 7% of all antibiotics used in 2016 were taken without prescription, with two main sources being over-the-counter (OTC) sales and use of leftover antibiotics. Lack of knowledge among patients and pressure on healthcare professionals to provide antibiotics without prescription were highlighted as two key factors contributing to this issue.[360]

Reports also confirm the link between antibiotics use and antibiotic resistance in both humans and food-producing animals. Reducing the unnecessary use of antibiotics will have an impact on the occurrence of resistance.[361] The WHO and the G20 consider antimicrobial resistance as a urgent problem that endangers public health.[362]

Breastfeeding is demonstrably better for the health of infants than bottle-feeding.[363] However, the number of women who are breastfeeding is low: only around 44% of children under 6 months of age are exclusively breastfed. Among the causes for declining breastfeeding rates are societal beliefs that breast milk is insufficient, lack of adequate knowledge and support for breastfeeding mothers and the aggressive promotion of infant formula and other breast-milk substitutes. According to figures by the WHO, around 820,000 children under five years old could be saved annually if all children (0-23 months) were properly breastfed.[364]

Tobacco is widely known to cause various forms of cancer and heart disease, as well as other diseases. It kills up to half of its users and is characterized by the WHO as "the only legal drug that kills many of its users when used exactly as intended by manufacturers".[365] In total, more than 8 million people die every year from tobacco use, including 1.3 million non-smokers exposed to second-hand smoke.[366] Around 80% of the world's 1.3 billion smokers live in lower- and middle income countries.[367] While anti-smoking legislation has been effective in lowering tobacco consumption in some countries, in many places such legislation is often still lacking – often in part due to extensive lobbying efforts by the tobacco industry.[368]

SDG 3: Good Health and Well-being lays out the overall importance of health to sustainable development. It includes targets to reduce the global maternal mortality ratio, end preventable deaths of new-borns and children under five years of age, end the epidemics of AIDS, tuberculosis, malaria and neglected tropical diseases and combat hepatitis, water-borne diseases, and other communicable diseases, achieve universal health coverage, and many more.[369]

SDG 6: Clean Water and Sanitation aims to improve health conditions by targeting to achieve access to adequate and equitable sanitation and hygiene for all. It also seeks to improve water quality by reducing pollution, eliminating dumping, and minimizing release of hazardous chemicals and materials, halving the proportion of untreated wastewater, and substantially increasing recycling and safe reuse globally.[370]

Financial institutions should take all these aspects into account when developing policies on health. To do this, financial institutions can make use of the international standards described below.

2.9.3 International standards and initiatives

The main international standards on health are summarised per topic, followed by the assessment elements that are formulated by the FFGI Methodology as a result:

- **Adequate standard of living**

  According to Article 25 of the Universal Declaration of Human Rights (UNDHR), "everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control". This right was further acknowledged by the UN General Assembly (UNGA) in a resolution passed in July 2022 which recognizes the right to a clean, healthy, and sustainable environment as a human right. The UNGA calls upon States, international organisations, businesses, and other stakeholders to "scale up efforts" to ensure a clean, healthy, and sustainable environment for all.[371]

  These rights have also been protected by the International Covenant on Economic, Social and Cultural Rights (ICESCR). Article 12 of this Covenant guarantees the right to an adequate standard of living including adequate food, clothing, housing, and continuous improvement of living conditions. This Article has also been interpreted as including access to sufficient water and sanitation.

  An important indication of the standard of living for countries is life expectancy. To compare countries, the United Nations developed the Human Development Index (HDI), a combination of per capita income, life expectancy and illiteracy percentage.

  Another important indication of the standard of living for countries is if and how the Human Right to Water and Sanitation is respected. The Institute for Human Rights and Business has published a report in 2011 to help business integrate human rights consideration in relation to water into business policies and practices.[372] In 2015 the UN Global Compact launched the CEO Water Mandate initiative on water and sanitation, which is intended to help companies translate their responsibility to respect these rights into their existing water management policies and practices.

This leads to assessment element	
1	Companies prevent the health of employees, clients and nearby residents to be deteriorated by their products or production processes (according to the precautionary principle).

- **Health and safety at work**

  Employers are responsible for the health and safety of their employees and this responsibility is recognized in various international standards. The Occupational Health and safety Convention (No. 155) adopted in June 1981 by the United Nations International Labour organisation (the ILO) is the main international standard on health and safety at work. The treaty clarifies what responsibilities companies have in this respect and what rights employees have. Over the course of time this convention has been completed and solidified with ILO-conventions that concern specific dangers for the health and safety of employees, such as the Asbestos Convention (No. 162) and the Chemicals Convention (No.170), as well as on specific industries such as the Safety and Health in Agriculture Convention (No. 184), the Safety and Health in Mines Convention (No. 176) and the Safety and Health in Construction Convention (No. 167). Moreover, the ILO publishes the so-called *Codes or Practice* for 35 various industries and issues with concrete measures to improve health and safety.[373]

  However, maintaining minimum standards on health and safety proves not to be sufficient. According to the ILO, a continuous and systematic pursuit to improve the health and safety of employees is necessary. With that objective in mind, in 2006 the Promotional Framework for Occupational Safety and Health Convention (No. 187) was adopted. In this convention, countries and companies are encouraged to do more to systematically improve the health and safety of employees and develop a preventive culture in the field of health and safety.[374]

  The United Nations Food and Agriculture Organisation (FAO) published the International Code of Conduct on the Distribution and Use of Pesticides, which sets the standard on the application, processing, and disposal of pesticides.

  The international standard ISO 45001:2018 Occupational health and safety provides globally applicable requirements for management systems regarding occupational health and safety. This standard provides requirements for a risk management system. It applies to all kinds of organisations and it serves to guarantee the health and safety of both employees and external stakeholders, for example contractors' staff and visitors. With such a management systems risks can be structurally surveyed and evaluated.

This leads to assessment elements	
1	Companies prevent the health of employees, clients and nearby residents to be deteriorated by their products or production processes (according to the precautionary principle).
2	Companies have a comprehensive health and safety policy.
3	Companies provide appropriate and gender- sensitive uniforms and/or PPE to all workers.

- **Ban on production and use of certain toxic substances**

  There are various international agreements that prohibit or phase out the production and use of various hazardous or toxic substances. The main examples are:

  - The Montreal Protocol on Ozone Depleting Substances was drafted in September 1987 and has been repeatedly tightened since. The protocol prohibits the production and the use of products that affect the ozone layer, such as chlorofluorocarbons (CFKs and HCFKs), halons and methyl bromide.

- The Stockholm Convention on Persistent Organic Pollutants was drafted in May 2001. This convention focuses on banning Persistent Organic Pollutants (POPs). POPs are chemicals that remain in the environment for a long period of time and that spread over large areas, accumulate in the fat of living organisms and are highly toxic for human beings and animals. POPs that have been prohibited globally include DDT, dieldrin, dioxins and PCBs. Many of these substances have been used in pesticides. The list is updated regularly and the latest change date from May 2023.[375]

This leads to assessment elements	
4	Companies respect international agreements on the production and the use of hazardous or toxic substances as described in the Montreal Protocol (on substances that deplete the ozone layer).
5	Companies respect international agreements on the production and the use of hazardous or toxic substances as described in the Stockholm Convention (on POPs).

- **International trade in chemicals and chemical waste**

  The international trade in chemicals and chemical waste, which carries the risk that chemical waste and chemicals prohibited in one country are dumped in another, less developed country, is constrained by two international conventions:

  - In the 1989 Basel Convention on the Control or Transboundary Movements of Hazardous Wastes and their Disposal, clear agreements have been made on the international trade in and safe processing of hazardous (chemical) waste. The 178 signatory countries oblige themselves to restrict the international trade in hazardous waste as much as possible, to process hazardous waste as close as possible to the place where it is created and to limit hazardous waste as much as possible. In December 2019 the Basel Ban Amendment, initially adopted by the parties to the second Basel Convention in 1995, entered into force as international law.[376] This effectively prohibits the export of hazardous wastes from countries that have ratified the Basel Convention to all other countries.
  - The Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade was agreed in 1998. The convention determines that certain pesticides and other hazardous chemicals prohibited in their own country may not be exported to other (developing) countries.

This leads to assessment elements	
6	Companies respect international agreements on trade in chemicals and chemical waste as stated in the Basel convention.
7	Companies respect international agreements on trade in chemicals and chemical waste as stated in the Rotterdam convention.

- **Control of the environmental and health consequences of chemicals**

  The international community increasingly acknowledges the need to understand the possible long-term consequences of chemicals to human health and the environment in advance. The *precautionary principle* entails that companies need to be responsible and proactive in avoiding certain risks. When the risks involved with the use of a substance cannot be satisfactorily quantified and removed, even if a cause and effect relationship has not been fully proven scientifically, then this substance should not be used. The burden of proof for the safety of a chemical should lie with the company and not with the public. This is also the case when a substance is not restricted or regulated by the government. Furthermore, the principle also entails considering alternatives and considering the full impacts of a substance over time.[377]

  Various agreements focus on a better analysis of the possible consequences and on a more cautious approach to introducing, producing, and using chemicals of which the effects are uncertain.

- In 1980, the International Programme on Chemical Safety (IPCS) was established by the WHO, the ILO, and the United Nations Environment Programme (UNEP). The IPCS disseminates scientific knowledge on the environment and health consequences of chemicals and helps governments to enhance their capacity in this field. The IPCS publishes an authoritative classification of pesticides based on the health risks they pose, the WHO Recommended Classification of Pesticides by Hazard.
- During the World Summit for Sustainable Development in Johannesburg in August 2002, it was decided that the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) be introduced, which was revised in 2007. With the GHS system that is now implemented and led by the United Nations Economic Commission for Europe, chemical substances all over the world are classified in the same way. In this way, rapid exchange of information on environmental and health effects is improved.
- In February 2006, the Strategic Approach to International Chemicals Management (SAICM) was adopted by the International Conference on Chemicals Management (ICCM). SAICM, which operates under the flag of the UNEP, provides governments with a policy framework for dealing with chemicals, including chemical waste and by-products, in a safe and sustainable way.
- In June 2007, the European regulation for the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) came into force. This regulation was adopted in order to better protect people's health and the environment from the risks of chemical substances. Simultaneously, it should enhance the competitive position of the chemical industry in the EU. It should also ensure a decrease in animal testing. The European Chemicals Agency (ECHA) is in charge of implementing REACH.[378]

  REACH requires companies to identify and control the risks related to the substances they produce or introduce on the market within the EU. They must show how the substance can be used safely and they must announce to their users how the risks are reduced. If the risks cannot be prevented, the authorities may limit the use of these substances in line with the precautionary principle. Member States or ECHA can also propose a substance to be identified as a substance of very high concern (SVHC). In REACH, compounds known as Endocrine Disrupting Chemicals (EDC) are considered at levels of concern similar to SVHCs.[379] In the long term the most dangerous substances must be replaced. Under REACH all companies in a supply chain of chemical substances (producers, importers, users, buyers) are responsible. REACH relies on the precautionary principle and is an example of how this can be operationalised.[380]

- The European Union has various reference documents for emissions of harmful substances to water and air for several industries, for example regarding the Ceramic Manufacturing Industry or for the Manufacture of Organic Fine Chemicals. These dictate the use of the Best Available Technology (BAT). European companies are also expected to comply with European standards outside the EU and other companies may be expected to follow the example of these European standards.

The OECD Guidelines for Multinational Enterprises recommend companies to educate and train their employees in issues concerning the environment and health and safety, including the handling of toxic substances. In addition, companies should ensure that their products and services meet all health and safety standards for consumers. Companies also have to inform consumers on this.

While both legislation and scientific insight tend to lag behind the use of potentially dangerous chemicals, ISO 26000:2010 Guidance on social responsibility stresses that this cannot be used as an excuse to delay measures that prevent harm to the environment and to people's health.[381] In addition to avoiding the use of banned chemicals, ISO 26000:2010 therefore advises companies to systematically identify and avoid the use of chemicals "identified by scientific bodies or any other stakeholder with reasonable and verifiable grounds as being of concern. An organisation should also seek to prevent use of such chemicals by organisations within its sphere of influence”.[382]

This leads to assessment elements	
8	Companies reduce the emission of harmful substances (to soil, water, and air) by making use of the best available technologies (BAT).
9	Companies restrict the use of chemicals suspected to be harmful to health in scientific literature and, if necessary, only in a responsible way (precautionary principle).

- **Access to medicine**

  The standard on access to medicine is set by the Access to Medicine Index. The Access to Medicine Index is supported by 134 leading global investment institutions that together manage assets with a value over USD 21 trillion.[383] The index shows that the 20 largest pharmaceutical companies significantly vary in their efforts to give patients in developing countries more access to affordable medication and vaccines. The last edition of the index was published in November 2022 and found that since the COVID-19 pandemic hit, more pharmaceutical companies have stepped up to make some of their products more widely accessible in low- and middle-income countries (LMICs). For the first time, all 20 pharmaceutical companies assessed report an access-to-medicine strategy, with 19 integrating this into their overall corporate strategy. However, low-income countries are still widely overlooked in comparison to middle-income countries. While some companies do now report ambitious new commitments in these countries, these must now be translated into action.[384]

This leads to assessment element	
10	Pharmaceutical companies ensure that patients with avoidable and treatable diseases have the right to access to medication.

- **Antimicrobial resistance**

  According to the WHO, antimicrobial resistance is one of the biggest threats to global health, food security, and development today. As important antimicrobial medicines such as antibiotics become less effective, a growing number of infections is becoming difficult and sometimes impossible to treat. The WHO Global action plan on antimicrobial resistance, endorsed at the World Health Assembly and adopted by the assemblies of the Food and Agriculture Organisation (FAO) and the Organisation for Animal Health (OIE) in 2015, has five strategic objectives:[385]

  1. “to improve awareness and understanding of antimicrobial resistance through effective communication, education and training;
  2. to strengthen the knowledge and evidence base through surveillance and research;
  3. to reduce the incidence of infection through effective sanitation, hygiene and infection prevention measures;
  4. to optimize the use of antimicrobial medicines in human and animal health;
  5. to develop the economic case for sustainable investment that takes account of the needs of all countries and to increase investment in new medicines, diagnostic tools, vaccines and other interventions.”

  The plan involves various industrial sectors (agriculture and food, pharmaceutical industry, finance, healthcare), but also regulatory bodies and consumers. Regarding antimicrobial medicines for humans, it is particularly important to promote the prudent use of antibiotics, in line with the European Commission’s 2017 European One Health Action Plan against AMR.

This leads to assessment element	
11	Companies apply a prudent use of antimicrobial medicines (antibiotics) in human beings and livestock farms in order to minimize antimicrobial resistance.

- **Bottle feeding**

  Since 1981 the WHO's International Code of Marketing of Breast-milk Substitutes has prohibited advertising breast-milk substitutes. Virtually all countries in the world have signed this code, but not all countries have included the code and in their own legislation.

  The International Baby Food Action Network (IBFAN) is therefore committed to realise that manufacturers comply with the WHO-code and the additional resolutions.

  The Access to Nutrition Index provides a ranking of companies that produce breast-milk substitutes (BMS), in which the compliance of manufacturers of BMS manufacturers with the WHO Code and subsequent World Health Assembly resolutions is assessed.[386]

This leads to assessment element	
12	Manufacturers of bottle-feeding comply with the WHO-code and additional resolutions on advertisements for breast-milk substitutes.

- **Tobacco**

  The Framework Convention on Tobacco Control of the World Health Organisation (WHO) is ratified by 168 states. Governments, but also companies, can make use of the recommendations in this framework to reduce the demand and supply of tobacco and passive smoking.

  A number of governments however, has not yet developed relevant legislation regarding this topic. WHO reports on the tobacco epidemic have repeatedly revealed that the tobacco industry continues to hamper government efforts to implement measures to prevent and combat tobacco use.[387] Subsequently, the UN Global Compact has excluded the tobacco industry from its initiative, citing the incompatible nature of the industry with the goals of sustainable development.[388] This decision aligns with the UNGC's policy with the WHO Framework Convention on Tobacco Control and was lauded by a coalition of health CSOs: "Tobacco products are fundamentally misaligned with UNGC's commitment to advancing business action towards 2030 Agenda's Sustainable Development Goal 3 (SDG 3) to "ensure healthy lives and promote well-being for all at all ages", and is in direct conflict with the right to public health".[389]

  While the Fair Finance Guide methodology expects companies to comply with the WHO Framework Convention on Tobacco Control, it also rewards policies that avoid investments in the tobacco industry.

This leads to assessment elements	
13	Tobacco manufacturers comply with the WHO Framework Convention on Tobacco Control and additional resolutions on the protection of current and future generations against the health, social, environmental and economic consequences of (passive) smoking.
14	Production of tobacco and tobacco-based products is unacceptable.

- **Procurement and supply chains**

  Companies are often part of long procurement and supply chains. They can monitor one another and question how they respect local and national legislation and international norms on labour rights. The requirements that companies set for their suppliers can be included in contractual agreements.

The importance of this has also been recognised in the OECD Guidelines for Multinational Enterprises. The OECD Due Diligence Guidance for Responsible Business Conduct provides practical support to companies on the implementation of the OECD Guidelines for Multinational Enterprises by providing plain language explanations of its due diligence recommendations. Implementing these recommendations can help companies avoid and address adverse impacts that may be associated with their operations, supply chains and other business relationships.

Furthermore, ISO 26000:2010 Guidance on social responsibility recognises the importance of supply chain responsibility, because “the impacts of an organisation's decisions or activities can be greatly affected by its relationships with other organisations”.[390] A company’s sphere of influence includes relationships within and beyond an organisation’s supply chain. Moreover, ISO 26000:2010 Guidance on social responsibility recommends setting contractual provisions or incentives as a means of exercising influence.[391]

In addition, ISO 20400:2017 Sustainable procurement – Guidance provides guidelines for organisations, independent of their activity or size, on integrating sustainability within procurement, as described in ISO 26000:2010 Guidance on social responsibility. It is intended for stakeholders involved in, or impacted by, procurement decisions and processes.

This leads to assessment elements	
15	Companies integrate health criteria in their procurement and operational policies.
16	Companies include clauses on the compliance with criteria on health in their contracts with subcontractors and suppliers.

3

Operational themes

3.1 Transparency and accountability

3.1.1 Assessment elements

For financial institutions that take social responsibility seriously, transparency and accountability is of great importance. The following elements are crucial regarding the financial institution's internal operations:

1. The financial institution describes its finance and investment framework regarding environmental and social issues and provides insight into how the financial institution ensures that investments meet the conditions set in its policies.
2. The financial institution publishes the names of companies in which it invests.
3. The financial institution mentions all companies (on its website) to which it grants new credits.
4. The financial institution mentions all companies (on its website) to which it has granted credits.
5. The financial institution discloses the names of all outstanding project finance transactions and project-related corporate loans, including the information required by the Equator Principles 4.
6. The financial institution publishes a breakdown of its portfolio by region, size and industry.
7. The financial institution publishes a sufficiently detailed breakdown of its portfolio, for example based on the first two digits of NACE and ISIC.
8. The financial institution publishes the *number* of companies with which it has engaged on social and environmental topics.
9. The financial institution publishes the *names* of companies with which it has engaged on social and environmental topics.
10. The financial institution publishes the *results* of engagement on social and environmental topics, including the topics, goals and deadlines.
11. The financial institution publishes the names of companies that are excluded from investment and financing due to sustainability issues, including the reasons for this exclusion.
12. The financial institution discloses a voting policy which explains how environmental and social issues are integrated into its voting decisions.
13. The financial institution publishes its voting record.
14. The financial institution publishes a sustainability report that is set up in accordance with recognised sustainability reporting frameworks.
15. The financial institution’s sustainability report has been verified externally.
16. The financial institution reports on the consultation with civil society organisations and other stakeholders.

17. The financial institution provides a breakdown of the volume of assets that are managed internally and/or externally.
18. The financial institution discloses the names of external asset managers.
19. The financial institution has set up mechanisms to ensure engagement and voting practices of external asset managers or service providers comply with their sustainability policies.
20. The financial institution has a complaint mechanism for individuals and communities that may be adversely affected by activities that it is connected to, and the scope of the complaint mechanism covers financed activities.
21. The financial institution has set up a grievance mechanism that is accessible, and clearly explains its process for managing complaints.
22. The financial institution reports on the progress and performance of the grievance mechanism or complaint mechanism open to stakeholders external to the bank.
23. The financial institution commits to respecting and cooperating in good faith with State-based non-judicial and judicial grievance mechanisms when cases that it is connected to are brought to such a mechanism.

3.1.2 What is at stake?

Each individual has the right to know what consequences business activities can have for his or her life and which risks he or she is exposed to in these activities. People are unable to defend their legitimate interests if they are not fully informed on the social, economic and environmental advantages, as well as the costs and risks connected to economic activities. Also, they have to be informed on the possible alternatives for the proposed activity. In order to properly defend their social, cultural and environmental interests, civil society organisations and their representatives need to have access to all relevant information.

For these reasons, the public right of information - with the objective to participate in a meaningful way in the decision-making process - is recorded in various international instruments. Examples are the 1948 Universal Declaration of Human Rights, the 1992 Rio Declaration on Environment and Development, the 1998 Aarhus Convention, the 2023 OECD Guidelines for Multinational Enterprises, ISO 26000:2010 Guidance on social responsibility and the Escazu Agreement.

For instance, the 2023 OECD Guidelines state that ''clear and complete information on enterprises is important to a variety of users ranging from shareholders, potential investors and the financial community to other constituencies such as workers, local communities, special interest groups, governments and society at large. To improve public understanding of the structure and activities of enterprises, their corporate policies and performance with respect to environmental, social and governance matters, enterprises should be transparent in their operations and responsive to the public's increasingly sophisticated demands for information.''[392]In addition, communicating externally relevant information on due diligence policies, processes, activities conducted to identify and address actual or potential adverse impacts, including the findings and outcomes of those activities is a key step of a responsible business conduct due diligence according to the OECD.[393]

Transparency and accountability are particularly important for financial institutions (FIs). In contrast to other companies, which operate in particular sectors, financial institutions play an important role in virtually every field of economic activity. As capital providers, investors and financiers carry a certain responsibility for the social and environmental consequences of all these economic activities. To this effect, financial institutions not only have to inform the public of their own activities, but also have to be as transparent as possible about the companies, projects and governments in which they invest.

For financial institutions, transparency also provides a significant advantage in that it allows them to timely recognise and act upon public concerns about activities in which they want to invest, before actual conflicts arise. Therefore, many Multilateral Development Banks (MDBs) which are owned by governments disclose detailed information on all the projects and companies they finance.[394]Some ethical banks are doing it as well to foster greater trust among their customers.[395]

Transparency and accountability form the basis for achieving many of the Sustainable Development Goals (SDGs). In particular, SDG: 16 Peace, Justice and Strong Institutions promotes the development of effective, accountable and transparent institutions at all levels.[396] Similarly, SDG: 12 Responsible Production and Consumption highlights the importance for companies to adopt sustainable practices and integrate reporting on sustainable aspects in their reports.[397] There are many other SDGs that cannot be achieved without transparent and accountable institutions, be it a company or a state.

When developing policies in this respect, financial institutions can make use of the international standards described below.

3.1.3 International standards and initiatives

There are various international standards on transparency (both at the level of the financial institutions as a whole as well as with respect to individual investments) and accountability. The main international standards on transparency and accountability of financial institutions are summarised per topic, followed by the assessment elements that are formulated by the FFGI Methodology as a result:

- **Finance and investment framework and auditing**

  In order to verify whether financial institutions meet their sustainability promises, financial institutions conduct internal audits of their credit and investment policies and framework regarding certain sectors and environmental, social and governance issues and the system put in place to implement those. This includes the due diligence processes. Based on these internal audits, they can establish whether their systems can be improved further.

  It is even better when financial institutions conduct an external audit of their credit and investment policies and framework, including due diligence processes, regarding certain sectors and environmental, social and governance issues where they can make use of AccountAbility's AA1000 Series of Standards, a combination of norms on accountability, auditing and reporting. Another system for auditing non-financial information is ISAE 3000, published by the International Assurance and Accounting Standards Board. Preferably, a summary of the results of these audits is made public, for example in the sustainability report, and discussed with stakeholders.

  In June 2023, the IFRS Foundation's International Sustainability Standards Board launched two important reporting standards, IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information and IFRS S2 Climate-related Disclosures. The two standards require companies and financial institutions to disclose sustainability and climate-related information on four core content areas: governance, strategy, risk management and metrics and targets. It is important to note that the ISSB Sustainability standards follow single materiality concept meaning that reporting entities only focus on how ESG risks and opportunities can affect their financial performance and position but not how their own activities affect the society and the environment. Many jurisdictions have already announced decisions to adopt or otherwise use the ISSB Standard in their respective regulatory frameworks.[398]

This leads to assessment elements	
1	The financial institution describes its finance and investment framework regarding environmental and social issues and provides insight into how the financial institution ensures that investments meet the conditions set in its policies.

- **Transparency on specific transactions**

  It is not sufficient that financial institutions publish positive sounding policy statements. Such policy statements should actually lead to more sustainable investment practices. This can only be verified publicly if the financial institution provides insight into loans granted and other investments. On the financial institution's website, stakeholders have to be able to find basic information on all transactions in which a financial institution is involved. Similarly, financial institutions should publish the names of governments they invest in, as is standard practice for many financial institutions. And if available, the social and environmental impact assessments on these transactions should also be publicly available.

  The financial institution should at least specify all regions and industries in a breakdown of its portfolio. Financial institutions often claim that they are unable to publish such information about companies as it harms trust with their clients. However, when a financial institution participates in bank syndicates, the information is often advertised in financial magazines and recorded in subscription-based financial databases.

  When financial institutions grant loans to individual companies, they can inform these clients in advance that their name could be published. Multilateral development banks such as the World Bank, the Asian Development bank and many others have been setting a good example in this respect. Since 1994, the International Finance Corporation (IFC) has a strict Access to Information Policy (AIP). On its website, IFC provides extensive and comprehensive information on its activities, including its investment guidelines and its investments. When IFC finances a certain project, information on that project is made available on its website, such as environmental impact assessments and environmental action plans. Another example is the Italian Banca Etica, which not only publishes information on its loans (name lender, term of the loan, amount), but also on potential transactions that are pending at an external Ethics Committee. The Government Pension Fund Global (Government Pension Fund of Norway), one of the largest pension funds in the world disclose its full investment universe per company name, country and investment areas.

  Commercial financial institutions should follow these examples by:

  - Providing an overview in their annual report of the industrial and regional breakdown of the transactions in which they are involved. Such information is required in the GRI Universal Standards and IFRS S1;
  - Providing an overview of all companies to which it has granted more than EUR 10 million credit. The value of this threshold is derived from the Equator Principles, but should not be limited to project finance;
  - Providing basic information through their website on the companies in which they invest; and
  - Formulating clear expectations for the companies in which they invest (in some situations) to provide information to involved communities on the social and environmental effects of their activities, such as those included in the Equator Principles for Category A transactions.

This leads to assessment elements	
2	The financial institution publishes the names of companies in which it invests.
3	The financial institution mentions all companies (on its website) to which it grants new credits.
4	The financial institution mentions all companies (on its website) to which it has granted credits.
5	The financial institution discloses the names of all outstanding project finance transactions and project-related corporate loans, including the information required by the Equator Principles 4.

If a financial institution does not wish to publish the names of companies it invests in or finances, it may provide insight in its investments based on at least the first two digits, but preferably the first four digits of the European Nomenclature Statistique (NACE). This standard is similar to the United Nations International Standard Industrial Classification of All Economic Activities (ISIC), and to other national industrial classification standards.[399]

Furthermore, banks in Europe can publish the outcome of the European Banking Authority's annual Transparency Exercise. The Transparency Exercise "provides detailed bank-by-bank data on capital positions, risk exposure amounts and asset quality".[400]

This leads to assessment elements	
6	The financial institution publishes a breakdown of its portfolio by region, size and industry.
7	The financial institution publishes a sufficiently detailed breakdown of its portfolio, for example based on the first two digits of NACE and ISIC.

- **Sustainability reporting**

The OECD Guidelines for Multinational Enterprises stress the importance of the disclosure of information “enterprises should disclose regular, timely, reliable, clear, complete, accurate and comparable information in sufficient detail on all material matters. This information should be disclosed for the entire enterprise, and, where appropriate, along business lines or geographic areas.”

In addition, the United Nations Guiding Principles on Business and Human Rights (UNGPs) also expect companies to report publicly: “In order to account for how they address their human rights impacts, business enterprises should be prepared to communicate this externally, particularly when concerns are raised by or on behalf of affected stakeholders”. Companies and financial institutions can make use of the UNGP Reporting Framework to report on their impact on human rights.

ISO 26000:2010 Guidance on social responsibility includes transparency as a principle and states that an organisation is responsible “for the impacts of its decisions and activities on society and the environment, through transparent and ethical behaviour.”[401]

In recent years, publishing annual sustainability reports has become commonplace. One of the most recognised standards for sustainability reporting are the Global Reporting Initiative (GRI) Standards. The new GRI Universal Standard was released in 2021 and went into effect in January 2023. In the revised Universal Standard, companies are required to report on ‘material topics’ which are defined as topics that represent an organisation’s most significant impacts on the economy, environment, and people, including its impacts on their human rights. The Universal Standard will be complemented by various *Sector* and *Topic Standards* in the coming years, some of which have already been developed.[402] GRI supports the concept of double materiality, and its standards represents the impact side of double materiality.[403]

In cooperation with the UNEP Finance Initiative (UNEP FI), the GRI in 2013 published the G4 Financial Services Sector Disclosure (FSSD), with specific guidelines on product portfolios, active ownership, investing in local communities and developing accessible and honest sale of financial products. The guidelines encourage financial institutions to not only describe their sustainability policy, but to also measure the respective implementation.[404] New standards are currently being developed by GRI.

This leads to assessment elements	
14	The financial institution publishes a sustainability report that is set up in accordance with recognised sustainability reporting framework.
15	The financial institution’s sustainability report has been verified externally.

The OECD's paper Responsible business conduct for institutional investors explains the application of the OECD Guidelines for Multinational Enterprises in the context of responsible investment and explains the obligations of investors on identification of business relationships: "An investor should account for how it has addressed adverse impacts throughout its operations and with its business relationships through (a) tracking and (b) communicating on results. […] Public reporting may include information on the following:

- Investor [Responsible Business Conduct] (RBC) Policy, including due diligence approaches;
- How investor RBC Policy and diligence approaches are implemented across different asset classes;
- Engagement activities undertaken by the investor;
- Companies with which the investor has engaged;
- Results of engagement with specific companies;
- Decisions regarding divestment;
- Voting records of investor in investee company shareholder meetings and guidelines for voting in investee companies;
- Investor's future RBC plans and targets."[405]

To enhance public accountability, financial institutions should improve their public report on their engagement efforts with clients or investees. Currently, there is an information gap between what is disclosed by financial institutions on their engagement activities with companies they are investing in versus their engagement with corporate clients they are providing credits and underwriting services to. While the information gap can be partially explained by what is mentioned in the OECD Guidelines for Responsible Corporate Lending and Securities Underwriting[406]: "many jurisdictions have legal frameworks, which recognise that a bank has a legal duty to keep its clients' affairs confidential", this does not mean, that all forms of disclosure are impossible. Bank can and should shift their practice away from the status quo. Indeed, as highlighted in the OECD Guidelines "banks can still take steps to promote greater transparency with respect to client relationships"[407], for instance they can use their leverage to obtain the consent of their clients to disclose specific information in certain circumstances such as when they are involved in serious human rights controversies.

Therefore, financial institutions should enhance accountability and transparency not only on their voting and engagement policies but also on the implementation of these polices. This disclosure is an essential prerequisite to enable stakeholders such as consumers, local communities, NGOs and regulators to assess and engage with the financial institutions on its sustainable investment practices.

This leads to assessment elements	
8	The financial institution publishes the number of companies with which it has engaged on social and environment topics.
9	The financial institution publishes the names of companies with which it has engaged on social and environmental topics.
10	The financial institution publishes the results of engagement, including the topics, goals and deadlines.
11	The financial institution publishes the names of companies that are excluded from investment and financing due to sustainability issues, including the reasons for this exclusion.
12	The financial institution discloses a voting policy which explains how environmental and social issues are integrated into its voting decisions.
13	The financial institution publishes its voting record.

- **Consultation**

Respecting the interests of the stakeholders is one of the principles in ISO 26000:2010 Guidance on social responsibility: "an organisation should respect, consider and respond to the interests of its stakeholders." The document also elaborates on ways to implement an effective stakeholder dialogue as part of the social responsibility of organisations.[408] In addition the 2023 OECD Guidelines include enhanced references to meaningful stakeholder engagement and call on enterprises to engage meaningfully with all stakeholders – in particular those affected – about business activity that may harm them. ''Meaningful stakeholder engagement refers to ongoing engagement with stakeholders that is two-way, conducted in good faith by the participants on both sides and responsive to stakeholders' views. To ensure stakeholder engagement is meaningful and effective, it is important to ensure that it is timely, accessible, appropriate and safe for stakeholders, and to identify and remove potential barriers to engaging with stakeholders in positions of vulnerability or marginalisation''.[409]

Through consultation mechanisms, financial institutions can also consult civil society organisations on their investment policy on certain sectors and issues. In order to make such consultations effective, it is important that financial institutions translate their policy documents into a language and jargon that is comprehensible to the communities and organisations involved. Serious concerns have to lead to adaptation of the policy of the financial institution and the procedures followed.[410]

The GRI Universal Standard of the Global Reporting Initiative requires companies in Disclosure 2-29 to describe its approach to engaging with stakeholders:

- the categories of stakeholders it engages with, and how they are identified;
- the purpose of the stakeholder engagement;
- how the organisation seeks to ensure meaningful engagement with stakeholders.

This leads to assessment element	
16	The financial institution reports on the consultation with civil society organisations and other stakeholders.

- **External asset managers and service providers**

Many investors, including pension funds and insurance companies, outsource a part or all of the management of their investments to external asset managers. In theory, this can be beneficial for both financial returns and the sustainability aspects of the investments, as external asset managers and service providers have specialized investment and ESG expertise. At the same time, outsourcing investments to external asset managers creates a potential transparency and accountability gap, as the responsibility for the invested assets is shared among different parties. For this reason, financial institutions that outsource their investments to external asset managers should have mechanisms in place to ensure that engagement and voting services provided by external investment managers are in line with their own policies.

The UN Principles for Responsible Investment (PRI) require asset owner signatories to report annually on the share of their asset that are managed internally and externally.[411] In addition, the PRI have published several papers and guidelines for asset owners relating to how asset owners should report on their relationship with external asset managers and service providers, and how to set up effective systems for selecting, appointing, and monitoring external asset managers:

- Asset owner technical guide – investment manager selection guide;
- Asset owner technical guide - investment manager appointment guide; and
- Asset owner technical guide - investment manager monitoring guide.

This leads to assessment elements	
17	The financial institution provides a breakdown of the volume of assets that are managed internally and/or externally.
18	The financial institution discloses the names of external asset managers.
19	The financial institution has set up mechanisms to ensure engagement and voting practices of external asset managers or service providers reflect their sustainability policies.

- **Grievance mechanisms**

  In the United Nations Guiding Principles on Business and Human Rights (UNGPs), the lack of grievances procedures is mentioned as a weak point of companies. Financial institutions that want to guarantee compliance with human rights for the companies in which they invest or finance should have a grievance mechanism. An earlier UN report by the late professor John Ruggie had indicated that "In the absence of an effective grievance mechanism, the credibility of such initiatives and institutions may be questioned."[412]

  Financial institutions are accountable to local communities and other stakeholders for involvement in companies they invest in or finance. The companies themselves are primarily responsible for the social and environmental effects of their activities; any grievances of communities should first be directed at them. However, this does not absolve a financial institution from the obligation to ensure that all investees meet the standards set by the financial institution in its investment and finance policies.

  According to the Office of the High Commissioner for Human Rights, UNGP 29 expects banks to have grievance mechanisms in place (their own, or one they participate in or cooperate with). Furthermore, in line with UNGP 22 banks too are expected to take responsibility for enabling remediation to communities and individuals that have been adversely impacted by the activities of companies that are financed by the bank. While operational level grievance mechanisms (either of the bank itself or established by other entities) are one means through which remediation can be provided, some impacts may be best remediated through other legitimate mechanisms, including State-based judicial and non-judicial mechanisms. Banks should respect stakeholder preferences with respect to use of a grievance mechanism or other legitimate processes, and "engage with the latter in good faith".[413]

  Many development banks and export credit insurance companies have a grievances procedure also called accountability mechanism. In recent years, some commercial banks have also started to set up their own grievance mechanisms that meets minimum criteria of being open to all rights-holders affected by the bank's finance, and being supported by a clear process for complaints.[414]

  Although limited in scope, the OECD National Contact Points can be considered as a grievance mechanism.[415] Financial institutions should therefore cooperate with OECD National Contact Points if stakeholders prefer to use it as a grievance mechanism.

  For non-judicial grievance mechanisms, both State-based and non-State-based, to be effective, the UNGPs expect it to be:[416]

  - Legitimate;
  - Accessible;
  - Predictable;
  - Equitable;
  - Transparent;
  - Rights-compatible; and
  - A source of continuous learning.

On the point of transparency, the guidance for UNGP 31 further stresses that a non-judicial grievance mechanism should keep parties to a grievance up-to-date about its progress, and provide sufficient information about the mechanism's performance, in order to build confidence in its effectiveness and meet any public interest at stake.[417]

This is also relevant for operational-level grievance mechanisms. The Fair Finance International network expects financial institutions that choose to establish a grievance mechanism themselves, to report about complaints received and about the progress of the complaints that are dealt with by the financial institution.

This leads to assessment elements	
20	The financial institution has a complaint mechanism for individuals and communities that may be adversely affected by activities that it is connected to, and the scope of the complaint mechanism covers financed activities.
21	The financial institution has set up a grievance mechanism that is accessible, and clearly explains its process for managing complaints.
22	The financial institution reports on the progress and performance of its grievance mechanism or complaint mechanism open to stakeholders external to the bank.
23	The financial institution commits to respecting and cooperating in good faith with State-based non-judicial and judicial grievance mechanisms when cases that it is connected to are brought to such a mechanism.

3.2 Financial consumer protection

3.2.1 Assessment elements

The following elements should be covered by a financial institution when developing a consumer protection policy:

1. The financial institution has a policy to disclose client's rights and the risks of products and services.
2. The financial institution has a policy that regulates staff ethics in serving clients in a non-discriminatory way.
3. The financial institution ensures that consumers have access to adequate complaints handling and redress that have a due diligence process in place.
4. The financial institution discloses the results of complaints monitoring such as number of complaints, main issues, in which institutions/body for consumers defence the complaints where registered (direct or indirect ones), and from which channels they were received (call centre, website, e-mail, phone, bank branch).
5. The financial institution has public commitments to reduce consumer complaints, fixing goals to achieve and making this information accessible to any stakeholder.
6. The financial institution has Alternative Dispute Resolution (ADR) Mechanisms, an independent redress process available to address complaints that are not efficiently resolved via the financial services providers and authorized agents' internal dispute resolution mechanisms such as the Ombudsman.
7. The financial institution has a debt resolution policy available for consumers who have become over-indebted.
8. The financial institution commits to communicating fairly and transparently about its products and services, in plain and accessible language that considers people living with disabilities and vulnerable groups.
9. The financial institution has developed and implemented risk profiles with regard to investment products.
10. The financial institution has clear and comprehensive data protection policies that define the types of data collected, purposes of data collection, processing, storage, usage, and sharing practices
11. The financial institution provides regular cybersecurity awareness and training programs for all employees to ensure they understand and follow best practices.
12. The financial institution has a policy in which it commits to find debt settlement solution(s) that are appropriate to the situation of the client and not abusive
13. The financial institution has procedures and policies to avoid tie-in sales or inappropriate sales practices.
14. The financial institution commits to inform its customers timely on changes in fees.
15. The financial institution remuneration structure for staff of both financial services providers and authorized agents is designed to encourage responsible business conduct, fair treatment of consumers and to avoid conflicts of interest.
16. The financial institution has a program to properly train and qualify employees and authorized agents on consumer rights and protection policies and practices.

17. The financial institution has a program to properly train and qualify employees and authorized agents on products and services to consumers.
18. The financial institution ensures that there are no access restrictions for customers because of Information and Communication Technology (ICT) based financial services.
19. The financial institution has a policy committed to provide accessibility for customers with disabilities and special needs at all physical branches and electronic services, and at online platforms.
20. The financial institution provides education and awareness programs to inform consumers about cybersecurity risks and safe practices.
21. The financial institution has a comprehensive fraud risk management policy that includes identification, prevention, detection, and response to fraud.
22. The financial institution commits to compensate consumers who have been victim of cyber fraud (scams, phishing attacks, ransomware attacks, identity theft, credit card fraud etc.)

3.2.2 What is at stake?

Consumers are essential stakeholders for financial institutions, which provide them with products and services essential to manage their daily financial needs, absorb financial and non-financial shocks (unemployment, sickness, accidents) and achieve their long-term goals. Financial institutions provide a range of products and financial services to consumers such as:

- **Current and saving accounts**: These are the most popular personal banking products that give to customers the flexibility of deposit and withdrawals. On saving accounts usually a small interest is paid;
- **Credit cards**: Credit cards and other forms of overdraft accounts and revolving credits, provide the consumer with a flexible, instant opportunity to lend money to spend it on different expenditures. Repayment usually needs to start within a month and high interest rates are charged;
- **Personal loans**: Loans that are tied to specific forms of expenditure, such as loans for the payment of educational fees, auto loans and other consumption credits. The borrower is provided with a fixed amount to be repaid over a given period by a fixed number of instalments;
- **Housing loans**: These loans are specifically intended to finance the acquisition of a house or other form of private property. The loans are secured by a mortgage on the borrower's property;
- **Personal investment:** This group of products provides individual consumers access to fixed and variable income investments;
- **Insurance**: These products include services related to pension plans and insurance products.

In general, these products and services are provided by retail banks and insurance companies. When dealing with consumers, financial institutions, particularly banks, should act in accordance with fair business and marketing practices and should take all reasonable steps to ensure the quality and suitability of the goods and services that they provide.

Both the trend towards financial inclusion and the increasing sophistication of financial markets have important implications for financial institutions. These factors drive changes in the behaviour of consumers and banks and can affect the stability of the system. The international financial crisis of 2008 motivated a serious reflection on the behaviour of financial market agents. The effects of the crisis have shown that weak consumer protection resulted in a high risk to the entire financial system. As underlined by the European Commission, the crisis led to a lack of confidence among all actors, in particular consumers.[418] Abusive loan products and practices reduced the reliability and the safety of the system and consumers lost confidence in the financial services.

The world economic crisis that followed the collapse of Lehman Brothers in September 2008 also revealed the risks involved in financialization. Basic needs like housing and retail bank products like mortgage loans were fixed into complex and risky financial products, leading to the subprime mortgage crisis, foreclosures, and the devaluation of housing-related securities.[419]

The rapid digitalisation and technological innovation of financial services, ranging from payments to banking and saving to insurance to investing, are benefitting consumers but bringing risks as well.

According to a 2020 OECD report "such risks include new forms of theft or fraud perpetrated online, data breaches and digital security incidents, excessive data profiling leading to financial exclusion, lack of privacy and manipulation of consumers' behavioural biases when operating online. Moreover, the nature of digital security risk is extremely dynamic, with the continuous appearance of new threats and identification of new vulnerabilities. In this increasingly digital environment and these new and evolving risks, the need for effective financial consumer protection, including data protection, is more important than ever."[420]

The Global Financial Inclusion (Global Findex) database, launched by the World Bank, estimates that between 2011 and 2021 the world has seen a 50% increase in the number of people having access to a bank account. In 2021, an estimated 76 percent of adults worldwide, compared to an estimated 51 percent reported a decade ago had a bank account, many in countries with low levels of consumer protection.[421] Globally, with 78 percent of men and 74 percent of women having a bank account, the gender gap in account ownership is 4 percentage points. In developing economies the gender gap is wider, at 6 percentage points.[422]

As a positive development, according to a World Bank Survey published in 2023, there has been a large increase between 2017 and 2023 in the proportion of countries that have dedicated financial consumer protection laws.

However, according to Consumers International (CI), "while there may be positive achievements in the development of digital financial service infrastructure and financial consumer protection frameworks, the results are not yet consistently translating to positive experiences and outcomes for all consumer groups.[423]

Financial services have become a basic need to individuals in modern society, since they enable consumers to solve current and unexpected necessities by providing payment services, access to loans, money transfers, investment solutions and insurance against risk. Financial services must be considered 'credence goods': even though they are repeatedly purchased, their utility is difficult for the consumer to define, and their features are not easily assessed. Indeed, the financial sector is characterised by a number of critical factors, which, according to CI, include:[424]

- the complexity of the products, and of product information;
- the high risks associated with many products;
- the fast changing nature of many of the products;
- their 'virtual' non-tangible nature, and
- the long-term nature of many transactions which means that consumers do not make regular purchases, and therefore do not develop an expertise in the market.

Inadequate or poorly enforced consumer protection regulations in the financial sector can lead to significant social and economic repercussions, such as heightened risks of financial crises, instability within financial systems, and an increase in debt levels, including widespread over-indebtedness.

Consumers International has therefore defined the responsibility of financial service providers to provide "clear, sufficient, reliable, comparable and timely information, suitable in these respects for the consumer to compare and contrast and to make an informed decision".[425]

In order to provide sufficient information, financial institutions should firstly be transparent when advertising their products. Contractual terms and conditions must be clear during the purchase phase. Consumers then need to be aware of risks and implications throughout the lifetime of products. Regarding some products such as pensions and mortgages, consumers require continuous monitoring, since they must control their disbursements and identify eventual required changes (e.g. early repayment or debt renegotiation).[426]

Among recurrent practices committed by financial institutions that violate consumers' rights there are:

- Unfair Loan Practices: charging interest on inflated loan balances and improper handling of automated payments, resulting in missed payments and fees;
- Debt Collection Violations;
- Absence of policies and measures to prevent and manage over-indebtedness;
- Discrimination in Lending;
- Failure to protect consumers against cybersecurity attacks or frauds;
- Week complaints handling and dispute resolution processes; etc.

3.2.3 International standards and initiatives

Consumers have some basic and internationally recognized rights, such as the right to information, to prior knowledge of contracts, to choose services with freedom and proper information, to security, privacy and data protection, the right to financial education, to over-indebtedness prevention mechanisms and to have free and effective conflict resolution solutions.

The main international standards on consumer rights and protection in the financial sector are summarised per topic, followed by the assessment elements that are formulated by the FFGI Methodology as a result:

- **Transparency on services, risks, and fees**

  According to the OECD, the complexity of financial services is growing rapidly. "The availability of information has grown both in quantity and complexity and the pace of change, in terms of new product developments, product innovations, and technological advances, has increased dramatically. Building and maintaining consumer confidence and trust in financial markets promotes efficiency and stability and helps to create positive outcomes for both financial institutions and their customers".[427]

  The OECD, the Financial Stability Board (FSB) and other relevant international organisations have worked together to develop common principles on consumer protection in the field of financial services, as a response to the G20 Finance Ministers and Central Bank Governors call in February 2011. As result, the organisations launched the G20 High-Level Principles on Financial Consumer Protection, designed to assist the efforts to enhance financial consumer protection.[428] These principles were revisited and updated in December 2022.[429]

  Regarding Principle 7 on Disclosure and Transparency, the updated report on the implementation of the principles describes that consumers should be provided with key information about the product or service: "Financial services providers and authorised agents should provide consumers with key information that informs the consumer of the fundamental benefits, risks and terms of the product. They should also provide information on conflicts of interest associated with the authorised agent through whom the product is sold. In particular, information should be provided on material aspects of the financial product. Appropriate information should be provided at all stages of the relationship with the customer. Standardised pre-contractual disclosure practices (e.g. forms) should be adopted where applicable and possible to allow comparisons between products and services of the same nature. (…) All financial promotional material should be accurate, honest, understandable and not misleading".[430]

The importance of transparency was also recognised in the OECD Guidelines for Multinational Enterprises on consumer interests. The guidelines identify two points that enterprises should take into account to give more transparency for products and services and which to some extent also apply to financial services. They should:[431]

- Provide accurate, verifiable and clear information that is sufficient to enable consumers to make informed decisions, including information on the prices and, where appropriate, content, safe use, environmental attributes, maintenance, storage, disposal of goods and services, and relevant ecommerce disclosures such as privacy issues, and information about available dispute resolution and redress options;
- Not make representations or omissions, nor engage in any other practices that are deceptive, misleading, or fraudulent;
- Support efforts to promote consumer education in areas that relate to their business activities, with the aim of, inter alia, improving the ability of consumers to: i) make informed decisions involving complex goods, services and markets, ii) better understand the economic, environmental and social impact of their decisions and iii) support sustainable consumption.

The general objective of the UN Guidelines for Consumer Protection is "taking into account the interests and needs of consumers in all countries, particularly those in developing countries; recognizing that consumers often face imbalances in economic terms, educational levels and bargaining power; and bearing in mind that consumers should have the right of access to non-hazardous products, as well as the right to promote just, equitable and sustainable economic and social development and environmental protection".

In order to achieve such objectives, two principles that frame the guidelines are directly related to transparency on the relationship with consumers:[432]

- The promotion and protection of the economic interests of consumers; and
- Access by consumers to adequate information to enable them to make informed choices according to individual wishes and needs.

The UN Guidelines for Consumer Protection also establish that Member States should work towards establishing, among other requirements:[433]

- A regulatory framework that promotes cost efficiency and transparency for remittances, such that consumers are provided with clear information on the price and delivery of the funds to be transferred, exchange rates, all fees and any other costs associated with the money transfers offered, as well as remedies if transfers fail;
- Fair treatment and proper disclosure, ensuring that financial institutions are also responsible and accountable for the actions of their authorized agents. Financial services providers should have a written policy on conflict of interest to help detect potential conflicts of interest. When the possibility of a conflict of interest arises between the provider and a third party, that should be disclosed to the consumer to ensure that potential consumer detriment generated by conflict of interest be avoided; and
- Improved financial education strategies that promote financial literacy.

On 18 October 2023, the European Parliament and the Council of the European Union (EU) adopted Directive 2023 on credit agreements for consumers (New Consumer Credit Directive) with the goal of ensuring a high level of consumer protection and a well-functioning internal market. This directive will repeal Directive 2008 on credit agreements for consumers (2008 Consumer Credit Directive) currently in force with effect from 20 November 2026. Among others, the new directive enlarges the scope of the directive to loans below €200 and buy-now-pay-later products, and aim to ensuring that credit information, such as the total cost of credit is presented in a clear and understandable manner and is adapted to digital devices.[434]

This leads to assessment elements	
1	The financial institution has a policy to disclose client's rights and the risks of products and services.
9	The financial institution has developed and implemented risk profiles with regard to investment products.
13	The financial institution has procedures and policies to avoid tie-in sales or inappropriate sales practices.
14	The financial institution commits to inform its customers timely on changes in fees.

- **Quality of consumer service**

  Financial institutions have to ensure that the quality of their consumer services are provided in accordance with consumer rights and protection policies and practices.[435] G20 High-Level Principles on Financial Consumer Protection Principle 6: Responsible Business Conduct of Financial Services Providers and their Authorised Agents presents guidelines on this aspect:[436]

  - **Best Interest**: Financial services providers and authorised agents should have as an objective to work in the best interest of their customers and be responsible for upholding financial consumer protection.
  - **Assessing Consumer Needs**: Depending on the nature of the transaction and based on information primarily provided by customers, financial services providers should assess the related financial capabilities, situation and needs of their customers before agreeing to provide them with a product, advice, or service.
  - **Staff Training**: Staff of financial services providers and authorised agents (especially those who interact directly with customers) should be properly trained and qualified.
  - **Remuneration Structure**: The (internal) remuneration structure for staff of both financial services providers and authorised agents should be designed to encourage responsible business conduct, fair treatment of consumers and to avoid conflicts of interest. The remuneration structure should be disclosed to customers where appropriate, such as when potential conflicts of interest cannot be managed or avoided.
  - **Responsibility for authorised agents**: Financial services providers should also be responsible and accountable for the actions of their authorised agents.

  Consumers International (CI) includes in its 2013 report on responsible lending a principle to avoid conflicts of interest caused by remuneration structure for staff: "Lenders' business practices should incentivise customer service not sales".[437]

This leads to assessment elements	
15	The financial institution provides regular cybersecurity awareness and training programs for all employees to ensure they understand and follow best practices.
15	The financial institution remuneration structure for staff of both financial services providers and authorized agents is designed to encourage responsible business conduct, fair treatment of consumers and to avoid conflicts of interest.
16	The financial institution has a program to properly train and qualify employees and authorized agents on consumer rights and protection policies and practices.
17	The financial institution has a program to properly train and qualify employees and authorized agents on products and services to consumers.

- **Non-discriminatory treatment**

  In the context of their responsibility to respect human rights, financial institutions have to provide access to their services and products fairly and without discrimination.

The commitment to provide accessibility for customers with disabilities and special needs is included in the guidelines defined by the 2006 UN Convention on the Rights of Persons with Disabilities. The guidelines define a general obligation for states to ensure and promote the full realization of all human rights and fundamental freedoms for all persons with disabilities without discrimination of any kind on the basis of disability.

The 2023 OECD Guidelines also states that businesses should ensure that the information presented to consumers is "presented in a comprehensible and easily accessible manner using plain language, while also regarding the needs of accessibility for consumers with disabilities".[438]

This leads to assessment elements	
2	The financial institution has a policy that regulates staff ethics in serving clients in a non-discriminatory way.
19	The financial institution has a policy committed to provide accessibility for customers with disabilities and special needs at all physical branches and electronic services, and at online platforms.

Financial institutions increasingly use Information and Communication Technology (ICT) services as an essential part of their financial products and services. However, some customers do not have the digital literacy or financial means to use the technology that is required for using these financial services. Digital literacy refers to the skills and knowledge required for a complete participation in a society based on technology. For certain groups, such as the elderly or those with limited financial means, a lack of digital literacy and/or access to digital banking services can form a barrier to access new financial services. Obligating customers to use a digital service to fully access their financial services is abusive and can discriminate against customers based on income level, age, and geography.[439]

In a 2021 position paper, the European Financial Services Users Group (FSUG) composed of experts who represent the interests of consumers, retail investors, micro-enterprises highlight issues faced by some consumers' groups in accessing basic financial services in today's EU retail financial services ecosystems as a result of increasing digitalisation.[440]

In Southeast Asia, the growing use of technology have led to huge progress on financial inclusion with 60 million new consumers in Southeast Asia joining the digital economy during the pandemic alone. However, challenges persist as around 150 million adults – or nearly a third of the population in Southeast Asia – still lack access to digital technologies.[441]

This leads to assessment element	
18	The financial institution ensures that there are no access restrictions for customers because of Information and Communication Technology (ICT) based financial services.

- **Management of consumer complaints**

  In order to reduce consumer complaints, some international standards introduce guidelines that could be followed by financial institutions. One of the objectives of UN Guidelines for Consumer Protection is to promote the availability of effective consumer redress. In the scope of measures enabling consumers to obtain redress, three guidelines are defined:[442]

  - "Governments should establish or maintain legal and/or administrative measures to enable consumers or, as appropriate, relevant organisations to obtain redress through formal or informal procedures that are expeditious, fair, inexpensive and accessible.
  - Governments should encourage all enterprises to resolve consumer disputes in a fair, expeditious and informal manner, and to establish voluntary mechanisms, including

advisory services and informal complaints procedures, which can provide assistance to consumers.
- Information on available redress and other dispute-resolving procedures should be made available to consumers."

Chapter VIII on consumer interests in the OECD Guidelines for Multinational Enterprises points out that enterprises should provide consumers with access to fair, easy to use, timely and effective non-judicial dispute resolution and redress mechanisms, without unnecessary cost or burden.[443]

In 2012, the OECD also recognised the importance of complaints handling and redress in its G20 High-Level Principles. Principle 9 presents guidelines and effective approaches to complaints handling and redress such as:[444]

- **Complaint Handling and Redress Mechanisms**: Jurisdictions should ensure that consumers have access to adequate complaints handling and redress mechanisms that are accessible, affordable, independent, fair, accountable, timely and efficient. Such mechanisms should not impose unreasonable cost, delays, or burdens on consumers.
- **Internal Complaints Handling**: In accordance with the above, financial services providers and authorised agents should have in place internal mechanisms for complaint handling and redress.
- **Alternative Dispute Resolution (ADR) Mechanisms**: Recourse to an independent redress process should be available to address complaints that are not efficiently resolved via the financial services providers and authorised agents' internal dispute resolution mechanisms.

This leads to assessment elements	
3	The financial institution ensures that consumers have access to adequate complaints handling and redress that have a due diligence process in place.
4	The financial institution discloses the results of complaints monitoring such as number of complaints, main issues, in which institutions/body for consumers defence the complaints where registered (direct or indirect ones), and from which channels they were received (call centre, website, e-mail, phone, bank branch).
5	The financial institution has public commitments to reduce consumer complaints, fixing goals to achieve and making this information accessible to any stakeholder.
6	The financial institution has Alternative Dispute Resolution (ADR) Mechanisms, an independent redress process available to address complaints that are not efficiently resolved via the financial services providers and authorized agents' internal dispute resolution mechanisms such as the Ombudsman.

- **Avoidance of over-indebtedness**

The United States subprime mortgage crisis in 2008 showed how the consequences of over-indebtedness are shared among all stakeholders of financial institutions. In developing countries, the problem of over-indebtedness is widespread. The indebtedness of Brazilian families hit a record in 2021, with an average of 70.9% of families in this situation. In comparison with 2020, growth was 4.4 percentage points, the highest increase recorded in the last 11 years. A study by SPC Brazil (the Brazilian Credit Protection Service) on defaulters shows that out of every 10 debtors, six are women - representing more than 38 million Brazilians.[445]

According to 2024 report from Moody's Rating which looks at six ASEAN economies, "most ASEAN economies saw a sizable increase in household debt over the past decade, supported by strong consumption spending and improving financial inclusion". The report identified Thailand and Vietnam as particularly at risk.[446]

In Europe, over-indebtedness is also an issue that the 2023 EU Consumer Credit Directive aims to tackle better by requiring lenders to assess whether consumers can repay their credit, so that they are protected from over-indebtedness.

The G20 High-Level Principles on Financial Consumer Protection present two points that intend to prevent over-indebtedness, in line with its Principle 9 (Responsible Business Conduct and Culture of Financial Services Providers and Intermediaries):

- **Best Interest**: Financial services providers and authorised agents should have as an objective, to work in the best interest of their customers and be responsible for upholding financial consumer protection;
- **Assessing Consumer Needs**: Depending on the nature of the transaction and based on information primarily provided by customers, financial services providers should assess the related financial capabilities, situation and needs of their customers before agreeing to provide them with a product, advice, or service.

This leads to assessment elements	
7	The financial institution has a debt resolution policy available for consumers who have become over-indebted.
8	The financial institution commits to communicating fairly and transparently about its products and services, in plain and accessible language that considers people living with disabilities and vulnerable groups.

- **Consumer safety**

Customers expect their financial institutions to ensure the safety of their money and the protection of their personal information. One of the objectives of UN Guidelines for Consumer Protection is to protect of consumers from hazards to their health and safety.

The OECD Guidelines for Multinational Enterprises on consumer interests highlight the importance of protecting personal data against consumer privacy violations, including security breaches. According to the guidelines, enterprises should:

Protect consumer privacy by ensuring that enterprise practices relating to the collection and use of consumer data are lawful, transparent and fair, enable consumer participation and choice and take all reasonable measures to ensure the security of personal data that they collect, store, process or disseminate.

In Principle 8 of the High-Level Principles on Financial Consumer Protection, the OECD stresses that “Consumers’ financial and personal information should be protected through appropriate control and protection mechanisms. These mechanisms should define the purposes for which the data may be collected, processed, held, used, and disclosed (especially to third parties). The mechanisms should also acknowledge the rights of consumers to be informed about data-sharing, to access data and to obtain the prompt correction and/or deletion of inaccurate, or unlawfully collected or processed data.”[447]

In the EU, the General Data Protection Regulation establishes the rights of natural persons to protection of their data, including the right to object to processing of their data by companies.[448]

This leads to assessment elements	
10	The financial institution has clear and comprehensive data protection policies that define the types of data collected, purposes of data collection, processing, storage, usage, and sharing practices.

12	The financial institution has a policy in which it commits to find debt settlement solution(s) that are appropriate to the situation of the client and not abusive

- **Cybersecurity and fraud prevention**

  The G20/OECD High-Level Principles on Financial Consumer Protection acts as a guide for the development of comprehensive financial consumer protection frameworks. The principles address the importance of promoting awareness to help consumers gain knowledge, understand risks, and make informed choices. The principles also highlight the importance of a strong and effective regulatory and supervisory framework to protect consumers from and sanction against misconduct, financial frauds, abuses and errors.

This leads to assessment elements	
20	The financial institution provides education and awareness programs to inform consumers about cybersecurity risks and safe practices.
21	The financial institution has a comprehensive fraud risk management policy that includes identification, prevention, detection, and response to fraud.
22	The financial institution commits to compensate consumers who have been victim of cyber fraud (scams, phishing attacks, ransomware attacks, identity theft, credit card fraud etc.)

3.3 Financial inclusion

3.3.1 Assessment elements

The elements of a good operational policy on financial inclusion covers the responsibilities of the financial institution, which is in most cases, a bank, towards its clients, which are individuals and MSMEs.[i] The following elements are crucial for a policy regarding the financial institution's actions in relation to financial inclusion:

1. The financial institution has policies, services and products that specifically target un-banked people, under-banked people and/or MSMEs.
2. The financial institution has branches in rural areas, not only in cities.
3. The financial institution provides branchless, cashless (e-money) and mobile banking services.
4. The financial institution's share of loans channelled to MSMEs is above 10%.
5. The financial institution does not require collateral for MSMEs to borrow.
6. The financial institution has a policy to improve financial literacy of low-income, marginalized and vulnerable groups, and MSMEs.
7. The financial institution does not charge clients to open a basic bank account or for a reasonable fee.
8. The financial institution does not require a minimum balance for maintaining a basic bank account.
9. The financial institution has a standard and provides information on credit processing time.
10. The financial institution has appropriate, affordable, and convenient financial products to send or receive domestic remittances through an account.
11. The financial institution provides low-income housing finance.
12. The financial institution provides products and services to improve access to banking services and finance for women and women entrepreneurs.

3.3.2 What is at stake?

Access to finance and credit to individual households provides the means to secure homes, invest in education and skills, get loans for health or medicine, bridge fluctuations in income generation and expenses, and start and expand businesses. According to the Global Findex Database, in 2021, 1.4 billion people - or 24% of adults in the world - did not have access to basic financial services. More than half of these "unbanked" adults live in seven economies in Africa and Asia and the majority of them are women.[449]

Though financial inclusion has increased (as the percentage of people with no access was 31% in 2017 [450]), it remains a burning issue related to the question of how finance can contribute to sustainable development. Financial inclusion has been suggested as an instrument of poverty reduction, as well as a means to tackle increasing worldwide inequalities. There is a growing awareness that growth with inequality has its own limit and it cannot be sustained, because aggregate demand will be limited. If inequality is intolerably high, it will result in a number of social consequences, at worst, social unrest, that will threaten economic growth and social stability.

---

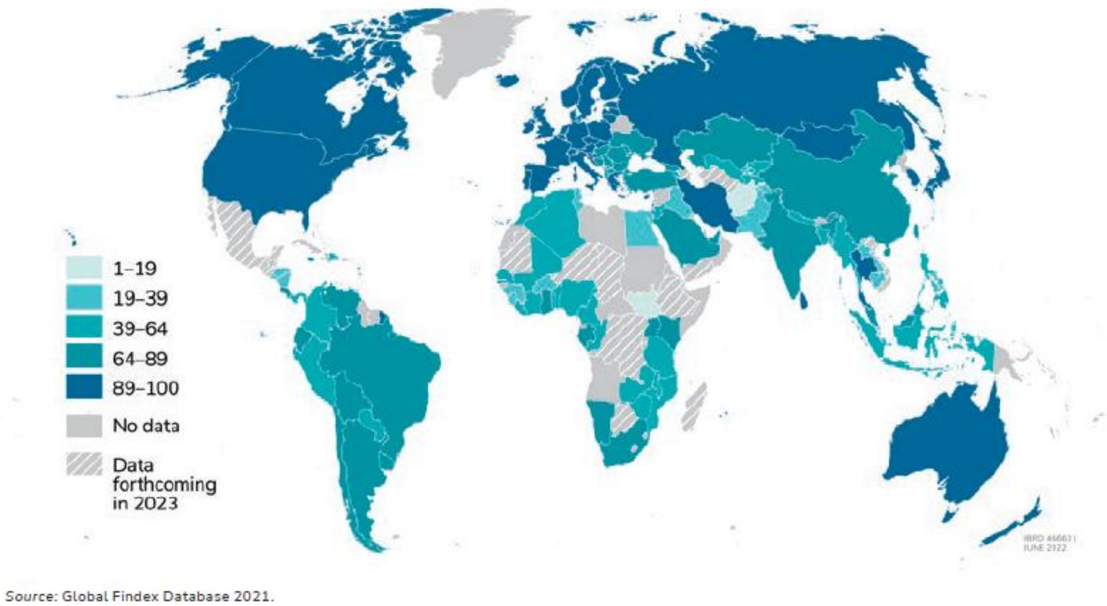
i For the purpose of the study microenterprises are defined as those with 1 to 4 employees; very small, 5 to 9 employees; small, 10 to 49 employees; and medium, 50 to 250 employees, based on IFC Advisory Services | Access to Finance (2013, August), *Access to Credit Among Micro, Small, And Medium Enterprises*, International Finance Corporation World Bank Group, p. 4.

International organisations, including the G20 and the World Bank, have formulated strategies to promote financial inclusion. Since 2010, more than 55 countries have made commitments to financial inclusion, and more than 60 have either launched or are developing a national strategy. [451] The World Bank has set an ambitious goal to achieve Universal Financial Access (UFA) for working-age adults by 2020. Adults worldwide would have access to a bank account or electronic banking for savings and loans, sending payments and receiving income or remittances.[452] While this campaign has ended (result not achieved), the World Bank has not yet formulated a new goal. Instead, on its website a five pillar-approach is mentioned to support national governments to achieve financial access and responsible financial inclusion.[453]

Over the last years, the number of people with a bank account has been growing fast. Between 2017 and 2021, the number of unbanked people dropped by over 300 million. Innovations in technology, particularly mobile money, are important drivers of rapidly increasing access to financial services in developing countries. Account ownership varies widely around the world. The difference in account ownership between high-income OECD economies and developing economies is significant, but also across economies within the same income groups. Among developing countries, the Middle East ranks the lowest and East Asia and the Pacific highest. See Figure 1 for an overview of account penetration around the world in 2021.

Apart from country and regional differences there is also a gender gap in financial inclusion. Globally, a gender gap of 4 percentage points exists (78 percent of men and 74 percent of women have an account) in 2021, while developing economies have a wider average gap, 6 percentage points. In 2021, 74 percent of men and only 68 percent of women in developing economies had an account.[454]

Figure 1 Percentage of adults with a bank account around the world (2021)



Source: Demirgüç-Kunt, A., L. Klapper, D. Singer, and S. Ansar (2022), *The Global Findex Database 2021: Financial Inclusion, Digital Payments, and Resilience in the Age of COVID-19,* Washington, DC, the United States: World Bank, p. 15.

Among the countries represented in the Fair Finance International network, there are large differences in account penetration. The FFI countries that are also members of the OECD have a rate of nearly 100%, while in Indonesia only about half of the population has a bank account. See Table 3 for figures on account penetration in countries with Fair Finance coalitions.

Table 3 Account penetration in Fair Finance countries (2021)

Country	Adults with an account		
	All adults (%)	Female adults (%)	Adults in poorest 40% of households
Bangladesh	53	43	49
Belgium	99	99	98
Bolivia	69	63	56
Brazil	84	81	82
Cambodia	33	33	23
Colombia	60	56	48
Ghana	68	62	55
Germany	100	100	100
Indonesia	52	52	47
Japan	98	99	98
Laos	37	38	23
Netherlands	100	99	100
Nigeria	45	35	33
Norway	99	100	99
Pakistan	21	13	18
Peru	58	53	46
Philippines	51	47	34
South Africa	85	86	78
Sweden	100	100	99
Thailand	96	93	98
Uganda	66	65	51
Vietnam*	56	53	40

* Data on Vietnam are for 2022.

Source: World Bank (n.d.), "The Global Findex Database 2021", online: https://www.worldbank.org/en/publication/globalfindex/Data, viewed in December 2022.

Micro, small, and medium enterprises (MSMEs) which have needs to access credit, face big challenges to access formal financial institutions. According to the International Finance Corporation MSMEs make up over 90% of all firms and account, on average, for 70% of total employment and 50% of GDP worldwide. At the end of June 2024, the MSME finance gap stood at $5.7 trillion – a number that swelled to $8 trillion when informal enterprises were included.

The terms financial inclusion, microfinance and microcredit are frequently used interchangeably, but have distinct meanings that should not be confused. To distinguish these terms, the following are the working definitions (yet still evolving) of financial inclusion, microfinance, and microcredit from recent literature:

- **Financial inclusion** (or **inclusive finance**) is defined as "access to a full suite of financial services, provided with quality, to everyone who can use financial services, with financial capability, through a diverse and competitive marketplace."[455] The New Microfinance Handbook emphasises financial inclusion as a "multidimensional, pro-client concept, encompassing increased access, better products and services, better-informed and -equipped consumers, and effective use of products and services".[456]

- **Microfinance** is defined as diverse financial services (including credit, savings, insurance, remittances, money transfers, or leasing) provision for the low-income and poor. These services are used for income generation, assets building, economic securities provision, and improving these low-segment clients' livelihood.[457]
- **Microcredit**, a sub-category of microfinance, is defined as a small amount of money loaned to a client by a financial institution. The specific characteristics of microcredit are group lending and the absence of collateral when borrowing.[458]

At the G20 Summit in Bali in November 2022, the Leaders' Declaration included a paragraph in which they endorse the G20 Financial Inclusion Framework on Harnessing Digitalization to Increase Productivity and Foster a Sustainable and Inclusive Economy for Women, Youth and MSMEs, as well as the updated G20/OECD High-Level Principles on Financial Consumer Protection.[459]

As an international development agenda, there has been a subtle shift from the concept of microfinance to financial inclusion, which, as indicated, covers a broader range of services than the term microfinance. While financial inclusion keeps the 'development objective' to pave the way for the poor to escape poverty, the 'inclusion' aspect of the term aims to cover not just the poor but also the near poor or even the middle class, in general, to increase the penetration of financial services to the whole population.

However, a broader definition of financial inclusion also poses some risks. It is because banks, although they are not the only financial institution actors for financial inclusion, on the one hand might be pressured by their state government to provide microcredit to small enterprises and poor people, on the other hand, might see this as an opportunity to expand their credit market to broader groups of population. Such expansion might lead to financial liberalisation and the commercialisation of credits. Other challenges for banks are the profitability and risks incurred by the provision of financial services and products to yet excluded clients.[460]

Broader access to finance might also bring about risks to clients. For instance, banks might use the previously excluded clients' savings or remittances to be invested in something with risks the clients have no information about or the clients might be offered products or services with risks they have no knowledge about. These risks are due to problems in the financial market: asymmetrical information, low quality of information, financial sector infrastructure and low levels of financial literacy and capability. These problems are faced not just by clients in low income countries but also in middle and high income economies. Lessons learned from the financial crisis – cases of predatory lending, subprime mortgages and other financial misconduct involving consumers – indicate that there is a need for re-emphasizing a top-down and bottom-up ethical approach for the financial sector, while improving access to remedy and ensuring protection for consumers, even in the financial inclusion agenda.[461]

In recent years, new opportunities and challenges have arisen for financial institutions and consumers regarding digital finance. While the digitalisation of the financial sector has significantly enhanced financial inclusion by providing greater access to financial services for underserved populations, it also raises concerns regarding data privacy, cybersecurity risks, and the potential for increased digital inequality among those without access to technology or digital literacy. The importance of consumer protection in financial markets and a methodology to assess the policies of financial institutions regarding consumer protection is further explained in section 3.1.

The topic of financial inclusion is recognized as an instrumental factor in achieving many of the Sustainable Development goals (SDGs). For example, SDG 1: No Poverty includes a target to ensure that everyone should have access to financial services, including microfinance, by 2030.[462] Similarly, SDG 5: Gender Equality emphasises on providing equal rights to economic resources and services to women including financial services.[463] Further, SDG 8: Decent Work and Economic Growth has a target to promote policies that encourage micro-, small- and medium-sized enterprises, including through access to financial services. It also focuses on strengthening capacity of domestic financial institutions to encourage and expand access to banking, insurance and financial services for all to enable economic growth.[464] One of the targets of the SDG 9: Industry, Innovation and Infrastructure is to increase the access of small-scale industrial and other enterprises, in particular in developing countries, to financial services, including affordable credit, and their integration into value chains and markets.[465] Financial inclusion is also an important aspect of SDG 10: Reduced Inequalities.[466]

While the aspect of governance and regulation is important in financial inclusion, at the same time it is important to keep financial providers like banks attracted to serve the financially excluded clients, despite the higher risks and lower profit.

The inclusion of excluded, unbanked and underserved people and MSMEs will contribute significantly to global poverty reduction. At the national level, it is the role of the government as regulator and facilitator, especially to develop related policies and an enabling financial infrastructure. Financial institutions can play a vital role in providing access to finance to all income groups in a society. The next section gives an overview of international standards with regard to financial inclusion, which serve as a basis for policies by individual financial institutions.

3.3.3 International standards and initiatives

Most international principles and standards pertaining to financial inclusion are voluntary, and have so far been introduced primarily by groups of countries like G8 and G20. Dedicated organisations such as the Center for Financial Inclusion (CFI) or the Alliance for Financial Inclusion are also involved in setting targets and principles regarding financial inclusion.[467] In this sub-section, we first list the major international initiatives and standards regarding inclusive finance. As a next step, a set of indicators will be provided to assess the financial inclusion policies of financial institutions.

- **Key Principles of Microfinance**

  The Consultative Group to Assist the Poor (CGAP), housed at the World Bank, is a global partnership to advance financial inclusion. According to CGAP, being included in the formal financial system helps people to:[468]

  - Make day-to-day transactions, including sending and receiving money;
  - Safeguard savings, which can help households manage cash flow spikes, smooth consumption and build working capital;
  - Finance small businesses or microenterprises, helping owners invest in assets and grow their businesses;
  - Plan and pay for recurring expenses, such as school fees;
  - Mitigate shocks and manage expenses related to unexpected events such as medical emergencies, a death in the family, theft, or natural disasters; and
  - Improve their overall welfare.

- **G20 Financial Inclusion Action Plan**

  The Global Partnership for Financial Inclusion (GPFI) is a platform for all G20 countries, interested non-G20 countries and relevant stakeholders to carry forward work on financial inclusion, including implementation of the G20 Financial Inclusion Action Plan (FIAP), endorsed at the G20 Summit in Seoul in 2010 and lastly updated in 2023. The 2023 plan focuses on digital financial inclusion and promoting MSME (Micro, Small, and Medium Enterprises) access to finance, particularly in low-income and developing countries. Maya Declaration on Financial Inclusion

  The Maya Declaration on Financial Inclusion of the Alliance for Financial Inclusion (AFI) covers four areas, which are aligned with the G20 Principles for Innovative Financial Inclusion:[469]

    - Create an enabling environment to harness new technology that increases access and lowers costs of financial services;
    - Implement a proportional framework that advances synergies in financial inclusion, integrity, and stability;
    - Integrate consumer protection and empowerment as a key pillar of financial inclusion; and
    - Utilize data for informed policymaking and tracking results.

- **UNEP Finance Initiative**

  The UNEP Finance Initiative (UNEP FI) has been active in advancing standards and initiatives in financial inclusion, emphasizing the integration of financial health within the sustainability framework. In February 2024, UNEP FI released a guidance titled "Driving Impact on Financial Health and Inclusion of Individuals and Businesses: From Setting Targets to Implementation." This initiative supports financial institutions in embedding financial well-being and inclusion into their operations. It provides a standardized framework, tools, and indicators to develop strategies, set impactful targets, and tailor actions for individuals and businesses.

  In December 2024, UNEP FI, jointly with UN Women, published another guidance for banks about ''Advancing Gender Equality and Women's Empowerment''. The guidance is to support banks – both retail and corporate – to advance gender equality and women's empowerment through the lens of sustainable, inclusive and responsible finance using a variety of critical pathways including by supporting women, girls and women-owned and women-led micro-, small- and medium-sized businesses to access, use and benefit from financial products and services that ultimately support their financial health.[470]

The main international standards on financial inclusion are summarised per topic, followed by the assessment elements that are formulated by the FFGI Methodology as a result:

- **Access of low-income and other marginal groups to financial services**

  Access to financial services is the first dimension to measure financial inclusion according to the G20 Financial Inclusion Indicators developed by the GPFI (Global Partnership for Financial Inclusion).

  The first focus area in the Maya Declaration on Financial Inclusion is to 'create an enabling environment to harness new technology that increases access and lowers costs of financial services (include promotion of mobile financial services to lower the cost of services)'.

  In its guidance on Advancing Gender Equality and Women's Empowerment, UNEP FI lists a number of key questions that bank should address to understand current levels of financial health and inclusion of women and women-owned and women-led businesses within their operating context and to identify potential barriers they face in accessing and using financial products and services. Such questions cover the access of women-owned and women-led MSMEs to the same breadth of financial products and services than men, the barriers they are facing (including potential challenges related to cultural or societal norms) and the internal operational challenges for banks to develop gender-responsive products and services.

This leads to assessment elements	
1	The financial institution has policies, services and products that specifically target un-banked people, under-banked people, and/or MSMEs.
2	The financial institution has branches in rural areas, not only in cities.
3	The financial institution provides branchless, cashless (e-money) and mobile banking services.
4	The financial institution's share of loans channelled to MSMEs is above 10%.
5	The financial institution does not require collateral for MSMEs to borrow.

This leads to assessment elements	
12	The financial institution provides products and services to improve access to banking services and finance for women and women entrepreneurs.

The UNEP FI Guidance on Driving Impact on Financial Health and Inclusion of Individuals and Businesses highlights the role financial institutions can play to positively contribute to financial health and financial inclusion through three enablers:

- Financial inclusion: by ensuring affordable and effective access for all individuals and businesses to suitable financial products and services via relevant channels that will support them to maintain or increase their financial health;
- Financial behaviour and capability of consumers: by supporting and improving how income is managed and used; and
- Financial literacy: by strengthening the financial awareness, knowledge, understanding, skills, attitudes, and capabilities that enable individuals to make informed financial decisions, effectively manage their finances and those of their businesses, and navigate various financial situations.[471]

This leads to assessment elements	
6	The financial institution has a policy to improve financial literacy of low-income, marginalized and vulnerable groups, and MSMEs.
7	The financial institution does not charge clients to open a basic bank account or for a reasonable fee.
8	The financial institution does not require a minimum balance for maintaining a basic bank account.
9	The financial institution has a standard and provides information on credit processing time.
10	The financial institution has appropriate, affordable, and convenient financial products to send or receive domestic remittances through an account.
11	The financial institution provides low-income housing finance.

- **Consumer protection**

  Consumer protection is more apparent in financial inclusion because the subjects of protection are most likely the poor or illiterate and therefore have no knowledge at all of any kind of information or grieving mechanism offered (or not) by the financial institution.

  The Maya Declaration on Financial Inclusion suggests an integration of consumer protection and empowerment as a key pillar of financial inclusion as one of its four broad areas that 'has been proven to increase financial inclusion'.

  Based on the OECD standard on consumer protection, the G20 countries also endorsed the G20 High-level Principles on Financial Consumer Protection, that encompass the following 12 topics:

1. Legal, Regulatory and Supervisory Framework;
2. Role of Oversight Bodies;
3. Access and Inclusion;
4. Financial Literacy and Awareness
5. Competition
6. Equitable and Fair Treatment of Consumers;
7. Disclosure and Transparency;

8. Quality Financial Products;
9. Responsible Business Conduct and Culture of Financial Services Providers and and Intermediaries;
10. Protection of Consumer Assets against Fraud, Scams and Misuse;
11. Protection of Consumer Data and Privacy; and
12. Complaints Handling and Redress.

The ISO 12812 standards series regarding mobile financial services have been available since 2016. Standards in the series include:

- ISO 12812-1:2017 Mobile financial services – General Framework;
- ISO/TS 12812-2: Security and data protection for mobile financial services;
- ISO/TS 12812-3: Financial application lifecycle management;
- ISO/TS 12812-4: Mobile payments-to-persons; and
- ISO/TS 12812-5: Mobile payments to businesses.

The assessment elements on consumer protection are part of the operational theme Financial consumer protection (section 3.1).

3.4 Remuneration

3.4.1 Assessment elements

The Remuneration theme of the FFGI Methodology focuses on the remuneration of senior executives, highest governance bodies and material risk takers. The following elements are crucial for a policy regarding the remuneration at the financial institution:

1. The financial institution maintains the right to recover bonuses if, after payment, it appears that they were paid unduly (a so-called *clawback* scheme).
2. The bonus is a maximum of 100% of the fixed annual salary.
3. The bonus is a maximum of 20% of the fixed annual salary.
4. The fixed salary of any employee does not exceed twenty times the lowest salary within the financial institution.
5. At least 60% of the bonus is based on long term objectives (not to be confused with agreements for deferred payment of the bonus).
6. The financial institution discloses that at least 60% of the bonus of members of the executive board is linked to sustainability (ESG) targets.
7. The financial institution discloses that at least 60% of the CEO's bonus is linked to sustainability (ESG) targets.
8. The bonus is based on improving the social and environmental impact of the financial institution's management and operational practices, and objectives associated with the allocation of variable remuneration are disclosed.
9. The bonus is based on improving the social and environmental impact of the financial institution's investments and financial services, and objectives associated with the allocation of variable remuneration are disclosed.
10. The financial institution clearly explains the principles governing the remuneration of different groups of employees (Board of Directors, executive positions, senior management, risk takers).

3.4.2 What is at stake?

A healthy and sustainable remuneration policy is one that balances the needs of employees, organizational goals, and long-term societal and environmental considerations.

Most often, remuneration in the banking sector include two components: a fixed remuneration and a variable remuneration. In this methodology, all forms of variable remuneration are considered a "bonuses". This includes profit sharing programs, except those that cover all employees and at equal terms. A healthy bonus policy should ensure effective risk management, be partly based on sustainability criteria, and should not incentivise excessive risk-taking. It should also include the possibility of recovering the bonus in cases of malpractice.

In case of good achievements or good financial results, the variable remuneration for the employee can be relatively high compared to the base salary, but the reverse can also occur.

Granting bonuses is often viewed as an 'honest' way of repaying exceptional efforts. Some also regard a bonus system as a way to encourage companies to become more sustainable.[472] However, there are negative aspects to consider.

Bonuses are in practice regularly linked to indicators in which the importance of the enterprise as a whole is not reflected and certainly not the wider social importance. In these cases, the indicators are skewed towards short term objectives, financial results and the achievements of the individual employee, while achievements coming from long term objectives and the non-financial results of the company as a whole would be better indicators. If these are left out of the equation, employees can be encouraged to take undesired and sometimes irresponsible risks that may be detrimental to the company and society.

The often very large bonus sums lead to much social indignation when the link between personal strengths, the financial achievements of the company and the height of the bonus seems lost. Top managers receiving huge salaries and bonuses while the enterprise they work for suffers financial difficulty and even has to fire people is incomprehensible to many people. The same applies to top managers of financial institutions.

Short-term objectives and the excessive sums characterise the bonus culture in the US, UK, and other financial institutions, mainly in investment banking departments. Many people consider this bonus culture to be one of the main causes of the 2008 financial crisis.[473] The prospect of a very high bonus – based on short-term financial objectives – led to granting mortgages and loans to people that could not really afford them. The consequences of this risky behaviour have been felt globally:[474]

Due to these developments, the public and governments have frequently called for the mitigation of bonuses, for linking bonuses to long-term objectives, or for the entire abrogation of bonuses, particularly in the financial world.[475]

Globally, the share of companies that have included sustainable objectives in their bonus policy is one third[476]. Such objectives are related to environmental issues (reduction of emissions and energy efficiency) and social issues (client satisfaction, safety, social involvement, employees).

The topic of balanced remuneration is important for achieving Sustainable Development Goal (SDG) 10: Reduced Inequalities. It can also be indirectly linked to SDG 16: Peace, Justice and Strong Institutions.[477] Due to the increased attention to the height of bonuses and the link with sustainability and corporate social responsibility, all financial institutions should develop solid bonus policies. To this effect, financial institutions can make use of the international standards and initiatives described in the following section.

3.4.3 International standards and initiatives

As far as regulation and standards concerning remuneration are concerned, there are currently no global policies in place.

In the United States, regulators have implemented mechanisms to supervise remuneration paid by banks to their employees, which are mandated by § 956 of the 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act. Banking regulators have specifically targeted bank practices regarding incentive-based compensation. In undertaking this initiative, the banking regulators have jointly implemented a variety of regulatory regimes.

In the United States, three Federal Statutes are relevant in relation to remuneration:[478]

- The 2002 Sarbanes-Oxley Act (SOA) §304; 15 U.S.C. §7243(a);
- The 2008 Emergency Economic Stabilization Act (EESA) §111(b)(3)(B), as added by Section 7001 of the American Recovery and Reinvestment Act of 2009 (ARRA); 12 U.S.C. §5221(b)(3)(B) (applicable only to recipients of assistance under the Troubled Asset Relief Program (TARP) that have not repaid the Treasury); and
- The 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act (DFA) §954, 15 U.S.C. §78j-4(b).

In the European Union, remuneration requirements for the financial sector are set out in the following three main Directives:[479]

- The 2013 Fourth Capital Requirements Directive (CRD IV) (EU Directive 2013/36), amended in 2022;

- The 2011 Alternative Investment Fund Managers Directive (AIFMD) (EU Directive 2011/61), updated in 2021; and
- The 2009 Undertakings for Collective Investment in Transferable Securities Directive (UCITS) (Directive 2009/65), updated in 2021.

The CRD V is the fifth iteration of the EU Capital Requirements Directive and came into force in 2020. It includes specific requirements for remuneration policies in credit institutions and investment firms, ensuring alignment with the institution's risk profile and discouraging excessive risk-taking. It also mandates gender pay gap analysis and transparency in variable pay arrangements.

The remuneration rules introduced in the CRD were elaborated by the European Banking Authority in Guidelines on Remuneration Policies and Practices, of which the most recent version was published in 2021. A maximum of 30% of the total bonus can be paid out in *cash*, for very large bonuses there is a maximum of 20%. The payment of 40 to 60% of the bonus has to be deferred over a period of at least three years so the bonus can be recovered if the results prove to be disappointing at a later stage. At least 50% of the bonus has to be paid out as subordinated capital: funds on which the bank can first make recourse should the bank get into trouble. The Guidelines also specify that remuneration policies must be gender neutral and respect the principle of equal pay for male and female workers for equal work or work of equal value.

The EBA has also published various Regulatory Technical Standards (RTS) for the definition of material risk takers, and for remuneration purposes set out process and criteria for the identification of staff who have an impact on the institution's risk profile, so-called 'Identified Staff'.[480]

The 2023 OECD Guidelines require enterprises to disclose "material information on the remuneration of members of the board and key executives". In the commentary on the Disclosure Chapter the text clarifies that material information on remuneration can include "the link between remuneration and the enterprise's long-term performance, sustainability and resilience". In addition the Guidelines mention that "enterprises are also expected to disclose timely information including material changes on the remuneration policies applied to board members and key executives as well as remuneration levels or amounts on a standardised and comparable basis so that investors can assess the costs and benefits of remuneration plans and the contribution of incentive schemes, such as stock option schemes, to performance".[481]

Other standards, reports and guidelines to consider are the UN Principles for Responsible Investment (PRI) and Global Compact's 2012 recommendations on remuneration; the G20's recommendations about remuneration at the Pittsburgh Summit in 2009; Consumers International's report Responsible Lending (2013); and the 2010 Sustainable Remuneration guide of the Association of Investors for Sustainable Development (VBDO), the Hay Group, and DHV, which serves as a manual to link sustainability objectives to the bonus of company managers.

The main international standards on remuneration in the financial sector are summarised per topic, followed by the assessment elements that are formulated by the FFGI Methodology as a result:

- **Clawback schemes**

  In its 2009 report FSF Principles for Sound Compensation Practices, the Financial Stability Board (FSB) states that compensation pay-out must be sensitive to the time horizon of risks. This means that if a bonus is granted that is sensitive to risk outcomes, it should be seen as a multi-year risk horizon. Otherwise employees could have an incentive to expose the firm to risks that are unlikely to be exposed for some time. To align time horizons a bonus can be subjected to a clawback.

In United States legislation 'clawback' means a repayment of previously received compensation required to be made by an executive to his or her employer. Clawbacks under SOA §304 concern only clawbacks from the CEO and the CFO and apply only to cases in which there is 'misconduct' resulting in "material noncompliance of the issuer with any financial reporting requirement under the securities laws".[482]

The Emergency Economic Stabilization Act (EESA) of 2008 only applies to institutions receiving aid under the Troubled Asset Relief Program (TARP) and requires that institutions that are receiving assistance under TARP are obligated to maintain certain standards for executive compensation and corporate governance.[483] Under the Dodd-Frank Act §954 (DFA), publicly traded firms are obligated to have policies in place that enforce the repayment of specific types of overpayments made to executives, based on financial results that turn out to be false and require a restatement.[484] The clawback is to be carried out if the listed company is required to file a financial restatement under securities laws due to material noncompliance under those laws. The clawback applies to "incentive-based compensation (including stock options awarded as compensation) during the 3-year period preceding the date on which the issuer is required to prepare an accounting restatement, based on the erroneous data, in excess of what would have been paid to the executive officer under the accounting restatement".[485]

In the European Union, malus or clawback arrangements are explicit ex-post risk adjustment mechanisms where the institution itself adjusts remuneration of a staff member based on such mechanisms (e.g. by lowering awarded cash remuneration or by reducing the number or value of instruments awarded). The CRD IV pertains to banks and other financial institutions and the clawback arrangements dictate that up to 100% of variable pay will be subject to clawback or malus arrangements. Financial institutions will be required to set specific criteria for such arrangements.[486]

This leads to assessment element	
1	The financial institution maintains the right to recover bonuses if, after payment, it appears that they were paid unduly (a so-called clawback scheme).

- **Bonus maximum**

In the United States, a maximum for bonuses or variable remuneration is officially regulated through DFA § 956. However, the language of the Act is not quantified sufficiently. For example, the banking, securities and federal housing regulators have proposed regulations that state that financial institutions are prohibited "from having incentive—based compensation arrangements that may encourage inappropriate risks (a) by providing excessive compensation or (b) that could lead to material financial loss to the covered financial institution".[487] However, no standards have been created to give these ambiguous regulations substance. Nevertheless, the regulators have claimed that such standards will be established.[488]

In the European Union, under the CRD IV "variable pay" is capped at 100% of total fixed pay or, with shareholder approval, 200% of total fixed pay. This is including performance based payments or benefits and, in exceptional circumstances, other contractual elements that do not *"form part of a routine employment package"* (examples in the Directive include healthcare, child care facilities or proportionate regular pension contributions). EU Member States have the discretion to adopt stricter standards (e.g. lower bonus caps).[489]

The Netherlands for instance has implemented regulation in 2013, which does not allow bonuses in the financial sector above 20% of the fixed annual salary.[490] A 2018 review of the regulation by the Dutch government found evidence that the 20% remuneration cap further decreased risk taking by bankers, when compared with a 100% cap.[491]

This leads to assessment elements	
2	The bonus is a maximum of 100% of the fixed annual salary.
3	The bonus is a maximum of 20% of the fixed annual salary.

- **Pay ratios**

  In the United States, the Dodd-Frank Act Section 953 requires proxy disclosure of the salary of median employees (as calculated under the SEC's executive compensation disclosure rules) compared to the pay of the CEO. Similarly, in the United Kingdom regulations were introduced in 2019 that require large companies to disclose the pay gap between the CEO and the median employee.[492]

  In the 2022 version of the Global Risks Report income disparities exacerbated by an uneven economic recovery risk [after Covid-19], increase polarisation and resentment within societies." As a result, "social cohesion erosion" is perceived as a critical threat to the world and is seen as "among the most potentially damaging for the next 10 years."[493] In line with this study, Oxfam International argued in its 2018 report Reward Work, Not Wealth that "there is growing evidence that the current levels of extreme inequality far exceed what can be justified by talent, effort and risk-taking".[494]

  Oxfam therefore recommends to "limit returns to shareholders and promote a pay ratio for companies' top executives that is no more than 20 times their median employees' pay, and preferably less".[495]

This leads to assessment element	
4	The fixed salary of any employee does not exceed twenty times the lowest salary within the financial institution.

- **Long-term objectives and sustainability criteria**

  Another criterion to consider for sound remuneration policies is that of long-term objectives for investment practices. When granting variable remuneration as a reward for certain achievements, it is important to consider whether the achievements concern long-term or short-term objectives, for the company itself and for society at large. This can also be accomplished through clawback schemes.

  The G20 has established that restructuring policy and practice on remunerations and bonuses is required to further support financial stability. At the Pittsburgh Summit in September 2009, the G20 agreed that it is necessary that a significant part of variable remunerations has to be linked to achievements and creating long term value. The G20 encourages companies to implement their agreements with immediate effect.

  In the European Union, regulation CRD V emphasizes that remuneration policies in financial institutions should align with long-term objectives, particularly in risk management and sustainability.. In the EBAs Guidelines on Sound Remuneration Policies, updated in 2021, it is stated that "To set the appropriate incentives for long-term-oriented and prudent risk taking, the remuneration policy and practices need to be transparent for staff regarding the fixed remuneration, the variable remuneration and the award criteria used. Fixed remuneration should be permanent, predetermined, nondiscretionary and non-revocable".[496]

  In its guidance document on implementing the Principles for Responsible Banking, UNEP FI recommends banks (among other) to:

  - Formally include sustainability criteria into the Terms of Reference or Charter for your Board's nomination, remuneration and audit committees or create a dedicated Board Committee focused on sustainability and responsible banking

- Link the achievement of targets and progress relating to the bank's sustainability objectives to remuneration and incentive systems throughout the organization.

This leads to assessment element	
5	At least 60% of the bonus is based on long term objectives (not to be confused with agreements for deferred payment of the bonus).
6	The financial institution discloses that at least 60% of the bonus of members of the executive board is linked to sustainability (ESG) targets.
7	The financial institution discloses that at least 60% of CEO's bonus is linked to sustainability (ESG) targets.
8	The bonus is based on improving the social and environmental impact of the financial institution's management and operational practices, and objectives associated with the allocation of variable remuneration are disclosed.
9	The bonus is based on improving the social and environmental impact of the financial institution's investments and financial services, and objectives associated with the allocation of variable remuneration are disclosed.

- **Application of remuneration policies**

  A solid policy on remuneration should clearly explain how the remuneration policy is applied to different groups or levels of employees. This at least concerns the Board of Directors, the directors (in case of a two-tier board structure), senior management and material risk takers. Senior management includes the people that are ultimately responsible for certain divisions, portfolios, internal departments, etc. that operate directly under the directors and Board of Directors. Material risk takers comprise of employees who may take decisions or have responsibilities that could expose the firm to material financial, operational, or reputational risks, this includes senior managers, risk managers, and individuals with significant influence over the firm's activities such as investment bankers, stock exchange traders and trading room managers.

This leads to assessment elements	
10	The financial institution clearly explains the principles governing the remuneration of different groups of employees (Board of Directors, executive positions, senior management, risk takers).

4

Sector themes

4.1 Arms

4.1.1 Assessment elements

Even more so than in other sectors, financial institutions should carefully consider their investments in and financing of arms manufacturers and traders. First of all, because it concerns lethal products with potentially devastating effects, but also because the industry is hardly transparent and has a history of corruption and violations of the law. With outstanding loans and/or investments in this industry, financial institutions can get involved in transactions related to very serious violations of human rights, armed conflicts, corruption, and the production of controversial or banned weapons.

The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:

1. Use, production, development, maintenance, testing, stockpiling of and trade in in anti-personnel landmines, including key components of landmines, are unacceptable.
2. Use, production, development, maintenance, testing, stockpiling of and trade in cluster munitions, including key components of cluster munitions, are unacceptable.
3. Production, development, maintenance, testing, stockpiling of and trade in incendiary weapons, including key components of incendiary weapons, are unacceptable
4. Production, development, maintenance, testing, stockpiling of and trade in nuclear weapons, including key components of nuclear weapons, are unacceptable.
5. Use, production, development, maintenance, testing, stockpiling of and trade in chemical weapons, including key components of chemical weapons, are unacceptable.
6. Use, production, development, maintenance, testing, stockpiling of and trade in biological weapons, including key components of biological weapons, are unacceptable.
7. Use, production, development, maintenance, testing, stockpiling of and trade in lethal autonomous weapons systems (LAWS), including key components of LAWS, are unacceptable.
8. Companies treat dual-use goods as military goods when they have a non-civilian purpose.
9. Supply of military goods to countries that are under a United Nations or relevant multilateral arms embargo, is unacceptable.
10. Supply of military goods is unacceptable if there is an overriding risk that the arms will be used for serious violation of international human rights and humanitarian law.
11. Supply of military goods to countries that severely violate human rights, is unacceptable.
12. Supply of military goods to parties involved in conflict is unacceptable, unless to parties acting in accordance with the UN Charter.
13. Supply of military goods to countries that are sensitive to corruption, is unacceptable.
14. Supply of military goods to countries having a failed or fragile state, is unacceptable.

15. Supply of military goods to countries that spend a disproportionate part of their budget on purchases of arms, is unacceptable.

4.1.2 What is at stake?

Arms can kill, maim, and destroy. Therefore, they are a threat to the most fundamental human right: the right to life. Arms are deployed in wars and armed conflicts between and within states, by government forces as well as armed groups that do not belong to a state (also known as non-state actors). Armed conflicts threaten the safety of millions of people around the world. Moreover, small arms are not only used in armed conflicts but also in conflicts between individuals, within families and between groups and gangs. The Small Arms Survey estimates that of the one billion firearms in circulation as of 2017, 85 per cent are in civilian hands.[497]

States have the right and the obligation to protect their citizens and individually or collectively defend security interests. States' responsibilities towards public security include regulating, checking, and monitoring the manufacture, transfer, possession, stockpiling and use of arms. Yet, in practice there has been a lack of expediency to governments and multilateral bodies (such as the United Nations Security Council) to monitor the international arms trade. Research reports show how the arms industry, despite existing regulatory regimes, continues to sell arms to human rights abusing regimes and conflict zones.[498]

Globally, the average military spending as a share of government expenditure in 2023 was 6.9%.[499] There seems to be an inverse relationship between military expenditure and the socio-economic development of poor countries. In developing countries - where there is a large need for investments in agriculture and food, education, health care and infrastructure - military expenditure presents significant opportunity costs and acts as a significant barrier to reaching the Sustainable Development Goals (SDGs).[500] According to the 2023 figures of the SIPRI Military Expenditure Database, Pakistan (14.45%) and Chad (15.34%) are examples of developing countries that spend a significant amount of their total government spending on the military.[501]

More than any other legal trade, international arms trade is strongly connected to corruption.[502] Although the arms trade only constitutes 1% of global trade, studies by SIPRI suggest that corruption in the arms trade contributes to roughly 40% of all corruption in global transactions.[503] A large part of arms exports goes to developing countries and emerging economies[504] and through corruption, public funds are diverted from spending on economic and social development and may end up fuelling conflict. High military spending clearly undermines these goals by attracting investments that could have been used elsewhere and by depriving the affected population of many basic needs.

The arms industry needs to ensure, as a minimum, that:

- It is not involved in the production of arms which are prohibited by an international treaty or do not distinguish between combatants and non-combatants (i.e. which violate International Humanitarian Law);
- Arms are not supplied to repressive regimes, fragile states, and non-state actors;
- It is not involved in any form of corruption and that transparency on arms transfers is improved;
- Procedures are in place to ensure that arms are not supplied to a state with disproportionate amount of military spending in comparison to its development (spending).

As long as these structural changes do not occur in the arms industry, investing in this industry imposes large risks. The UN Working Group on Business and Human Rights published an 'Information Note' in 2022 that reaffirmed that arms producers have a responsibility to conduct human rights due diligence that is distinct from the responsibility of states. The note explicitly mentions financial sector actors as part of the value chain of arms producers.[505] Financial institutions could finance or invest in companies that are involved in corrupt practices or in trade with oppressive regimes. Hence, it is of great importance that financial institutions implement a policy for this industry that is based on the international standards described below.

4.1.3 International standards and initiatives

The main international standards on arms are summarised per topic, followed by the assessment elements that are formulated by the FFGI Methodology as a result:

- **International humanitarian law**

  International Humanitarian Law (IHL) is a collection of leading international agreements that constitute the rules concerning armed conflicts. The objective of IHL is to limit civilian suffering from armed conflicts. It protects people who do not participate in hostilities and limits the means and methods of warfare. An important principle is that distinction has to be made during warfare (including with the use of arms) between combattants and non-combattants: civilians should not be a target in warfare.[506] Weapon systems which violate this principle are, among others: landmines, cluster munitions, nuclear weapons, chemical weapons and biological weapons.

  There are various international conventions that aim to ban or restrict the use, production, development, maintenance, testing, trade and/or stockpiling of specific weapon systems:

  - The 1970 Nuclear Non-proliferation Treaty (NPT) aims to prevent the spread of nuclear arms and requires their negotiated disarmament.
  - The 1975 Biological and Toxin Weapons Convention (BWC) prohibits the use of biological and toxin weapons.
  - The 1980 Convention on Certain Conventional Weapons (CCW) aims to prohibit or restrict the use of weapons that are considered to cause unnecessary or unjustifiable suffering to combatants or to affect civilians indiscriminately.
  - The 1992 Chemical Weapons Convention (CWC) prohibits chemical arms.
  - The 1997 Mine Ban Treaty prohibits anti-personnel landmines.
  - The 2008 Convention on Cluster Munitions (CCM) prohibits cluster munitions.
  - The 2017 Treaty on the Prohibition of Nuclear Weapons prohibits nuclear weapons.

  Since the 1992 Chemical Weapons Convention (CWC), the prohibition of (financial) assistance as defined in international treaties has been understood to include both natural and legal persons (individuals and corporate entities). This formulation has been the most persistent, including in the adopted language in the Treaty on the Prohibition of Nuclear Weapons.[507] Protocol III of the CCW prohibits the use of incendiary weapons, which includes any weapon or munition primarily designed to set fire to objects or cause injury to civilians.[508]

  Article 1 (1) c of the CCM convention reads: “Each State Party undertakes never under any circumstances to assist, encourage or induce anyone to engage in any activity prohibited to a State Party under this Convention.”[509] Additional efforts to clarify the understanding that the prohibition on assistance also applies to financing relationships have resulted in national legislation in approximately eleven countries and interpretive statements in at least an additional 35 countries.[510]

  Similarly, the Treaty on the Prohibition of Nuclear Weapons, in article 1(e) also prohibits ‘assistance’ to the production of nuclear weapons.

This leads to assessment elements	
1	Use, production, development, maintenance, testing, stockpiling of and trade in anti-personnel landmines, including key components of landmines, are unacceptable.
2	Use, production, development, maintenance, testing, stockpiling of and trade in cluster munitions, including key components of cluster munitions, are unacceptable.

This leads to assessment elements	
3	Production, development, maintenance, testing, stockpiling of and trade in incendiary weapons, including key components of incendiary weapons, are unacceptable
4	Production, development, maintenance, testing, stockpiling of and trade in nuclear weapons, including key components of nuclear weapons, are unacceptable.
5	Use, production, development, maintenance, testing, stockpiling of and trade in chemical weapons, including key components of chemical weapons, are unacceptable.
6	Use, production, development, maintenance, testing, stockpiling of and trade in biological weapons, including key components of biological weapons, are unacceptable.

- **Lethal Autonomous Weapon Systems**

  The United Nations' Convention on Certain Conventional Weapons (CCW) also prohibits non-detectable fragments, boobytraps and blindable laser weapons. In addition, the CCW is considering how to address concerns related to Lethal Autonomous Weapon Systems (LAWS). 30 countries support a prohibition on LAWS. The Campaign to Stop Killer Robots, a coalition of civil society organisations, defines LAWS as fully autonomous weapons, that can select and engage targets without meaningful human control over individual attacks.

  There are various legal, ethical and security concerns regarding LAWS.[511] A legal concern is that LAWS are unlikely to be able to adhere to International Humanitarian Law and Human Rights Law. They would also create an accountability vacuum regarding who is responsible for an unlawful act. A security concern is that the deployment of LAWS could lower the threshold for the use of force and reduce the incentive to find political solutions to end conflicts. LAWS could lead to a new international arms race, which would have destabilising effects and threaten international peace and security. The proliferation of LAWS could enable dictators, non-state armed actors or terrorists to acquire these weapons. A fundamental ethical concern is that a machine should never be allowed to make the decision over life and death. This decision cannot be reduced to an algorithm.

  Due to these concerns the Campaign to Stop Killer Robots calls on states to install a legally binding instrument that pre-emptively prohibits the development, production and deployment of LAWS.[512] Likewise, over 4,500 artificial intelligence and robotics experts and 116 industry leaders call for regulation of LAWS, but also religious leaders, Nobel peace Laureates and the European Parliament are in favour of a ban. In the financial sector, the ethical committee of the Norwegian Government Pension Fund Global suggested to exclude companies involved in developing or producing lethal autonomous weapons.

This leads to assessment element	
7	Use, production, development, maintenance, testing, stockpiling of and trade in lethal autonomous weapons systems (LAWS), including key components of LAWS, are unacceptable.

- **International arms trade**

  The international trade arms can create and exacerbate serious human rights issues, especially in countries where people lack basic freedoms or where armed conflicts rage. Likewise, in countries most susceptible to corruption, in fragile states, or where a relatively high share of public spending is for the military, there is a serious risk that delivering arms enhances serious violations of human rights and/or contribute to creating more poverty.[513]

  There are various initiatives to regulate arms trade in order to, for instance, prevent arms from being delivered to repressive regimes or countries in conflict. In international arms export control, military goods have been defined by a number of international agreements. One of the most elaborate lists of goods that should be considered as military goods is the Munitions List of the Wassenaar Arrangement. Signed in 1996, the arrangement currently has 42 signatories, including all NATO members. The arrangement foresees in regular exchange of information between the signatories on arms exports and emerging military technologies, also with an eye to potential modifications of the list to keep it relevant and up-to-date. While called the Munitions List, this list contains all goods specially designed or modified for military use.

Organisations such as the United Nations Security Council and other multilateral organisations have the (international) authority to establish arms embargoes against certain countries or non-state actors. Most embargoes are established following conflicts involving serious violations of human rights.

Some arms embargoes are partial in nature. For example, the EU embargo against China is understood to ban the export of "lethal" goods[514], whereas the only politically binding EU embargo against Egypt relates to goods that might be used for internal repression.[515] This research does not make such distinctions, because in most cases, transferring arms to countries under a partial embargo means supporting repressive regimes or the continuation of armed conflicts.

Other embargoes only apply to so-called non-government forces (NGF's). In this FFGI Methodology, the countries' territories within which the NGF's under an embargo operate, are also considered controversial with regard to arms trade. These countries should, by definition, be considered as weak or fragile states, as the government does not have a monopoly on the use of violence within its own territory. Consequently, it is not uncommon that arms supplied to government forces of fragile states end up with NGF's.[516]

The Arms Trade Treaty (ATT) is a multilateral treaty that regulates the international trade in conventional arms. It was adopted on 2 April 2013 by the General Assembly of the United Nations with a large majority of votes. After obtaining the required 50 ratifications, the treaty entered into force on 24 December 2014.[517] The ATT describes how it regulates the conventional weapons trade: "At the heart of the ATT is the obligation on countries that have joined it to make an assessment of how the weapons they want to transfer will be used. They must determine if the arms would be used to commit or facilitate genocide, crimes against humanity, war crimes and serious human rights violations. Each state must assess if there is an overriding risk that a proposed arms export to another country will be used for or contribute to serious human rights abuses. If so, those arms must not be sent. [...] The Treaty [also] sets out guidelines for states that are importing weapons, and requires importers and exporters to cooperate in sharing information necessary to make the above assessment. It also includes obligations for countries that have weapons transiting through their borders and for brokering activities. [...] The Treaty covers conventional weapons (meaning not nuclear, chemical, or biological). The arms specifically mentioned in the Treaty are battle tanks, armoured combat vehicles, large-calibre artillery systems, combat aircraft, attack helicopters, warships, missiles and missile launchers and small arms and light weapons. Ammunition, as well as the parts and components that make up weapons systems, also fall under its regulation".[518]

Taken into account that the humanitarian principles that form the basis of the ATT, the Control Arms Campaign interprets the term *overriding risk* in the ATT to mean that states are not allowed to export in case of a 'substantial or clear' risk of the arms being used for serious violations of human rights or humanitarian law.[519]

The ExitArms database is a publicly available database on companies that supply arms to warring states. The database covers around 600 companies from 50 countries that were involved in arms exports to 40 states between 2016 and 2021.

This leads to assessment elements	
9	Supply of military goods to countries that are under a United Nations or relevant multilateral arms embargo, is unacceptable.
10	Supply of military goods is unacceptable if there is an overriding risk that the arms will be used for serious violations of international human rights and humanitarian law.
11	Supply of military goods to countries that severely violate human rights, is unacceptable.

- **Trade in dual-use products**

The European Union (EU) has also recognized the need for a system to control arms transfers. Its 2008 Common Position "defining common rules governing control of exports of military technology and equipment" contains eight criteria, aimed at, among others, preventing military exports likely to be used in the country of final destination for internal repression, in internal or international conflicts. In September 2019, a Decision of the European Council, amending the Common Position, includes a new article where "each Member State is encouraged to reassess export licenses for items on the EU Common Military List after they have been granted."

The EU arms export policy also contains measures to facilitate implementation by the member states and improve cooperation between the member states. The EU criteria are summarized below:[520]

- Respect for international commitments of Member States, in particular sanctions decreed by the UN Security Council and the EU, as well as agreements on non-proliferation and other international obligations;
- The respect of human rights and international humanitarian law in the country of destination;
- The internal situation in the country of final destination, as a function of the existence of tensions or armed conflicts;
- Preservation of regional peace, security and stability;
- The national security of the Member States and of territories whose external relations are the responsibility of a Member State, as well as that of friendly and allied countries;
- The behaviour of the buyer country with regard to the international community, as regards in particular its attitude to terrorism, the nature of its alliances and respect for international law;
- The risk that equipment will be diverted within the buyer country or re-exported under undesirable conditions;
- The compatibility of the arms exports with the technical and economic capacity of the recipient country, taking into account the desirability that states should achieve their legitimate needs of security and defence with the least diversion for armaments of human and economic resources, e.g. through considering the recipient country's relative levels of military and social spending.

The EU Common Military List should be used to define if a product should be considered as military equipment. Equipment that can be used for both civilian and military applications, should be considered as military equipment when they have a non-civilian purpose.

The Wassenaar Arrangement (see above) also specifies goods with both civil and military applications in a separate Dual-Use List.

This leads to assessment element	
8	Companies treat dual-use goods as military goods when they have a non-civilian purpose.

- **High-risk countries**

  Several lists and initiatives can serve to illustrate which countries are high-risk as recipients of arms trade, based on the criteria mentioned in earlier sections:

  - Most of the countries where people lack freedom can be looked up in the index of the Freedom House. Freedom House annually publishes Freedom in the World. This publication assesses 195 countries and 14 related and disputed territories with regard to Political Rights and Civil Rights.
  - In addition, the Economist's Democracy Index provides a snapshot of the state of democracy worldwide. The report covers almost the entire population of the world and the vast majority of the world's states (micro states are excluded). The Democracy Index is based on five categories:[521]

    - electoral process and pluralism;
    - civil liberties;
    - the functioning of government;
    - political participation; and
    - political culture.

    Countries are placed within one of four types of regimes: full democracies, flawed democracies, hybrid regimes, and authoritarian regimes.

  - Countries that have been caught up in armed conflicts are ranked in the Uppsala Conflict Data Program. The Global Peace Index by Vision of Humanity, an Australian research institute, is a useful tool as well. It assesses the extent to which countries live in peace or are caught up in conflicts, using 23 indicators.
  - The Government Defence Anti-Corruption Index Corruption Perception Index of Transparency International is the first global analysis of corruption risk within military establishments worldwide. It assesses and compares levels of corruption risk and vulnerability across countries.
  - The Fragile States Index can be used for identifying fragile states. This Index is published by the American journal Foreign Policy and the Fund for Peace, an American research institute. The Fragile States Index assesses 178 states, using 12 social, economic, political, and military indicators toto assess which states are most vulnerable to violent internal conflicts and social decline.
  - In order to indicate which countries spend a large share of their government budget on arms, the publications of the Stockholm International Peace Research Institute (SIPRI) may be used. SIPRI is an independent Swedish research institute for peace and security.

This leads to assessment elements	
12	Supply of military goods to parties involved in conflict is unacceptable, unless to parties acting in accordance with the UN Charter.
13	Supply of military goods to countries that are sensitive to corruption, is unacceptable.
14	Supply of military goods to countries having a failed or fragile state, is unacceptable.
15	Supply of military goods to countries that spend a disproportionate part of their budget on purchases of arms, is unacceptable.

4.2 Food

4.2.1 Assessment elements

A reform of the global food and agriculture sector is badly needed in order to improve its contribution to sustainable development and to meeting its responsibility to respect peoples' right to food. Only through sustainable practices the massive deforestation that presently takes place as a result of the growth of agricultural activities can be reduced. This would protect biodiversity and ecosystems, climate change and fight desertification as well as preventing social problems with respect to the land rights of the local populations. Financial institutions play an important role in the food and agriculture sector as they finance producers, processors, traders and importers of agricultural products, such as food companies and supermarkets. On these grounds, financial institutions carry a shared responsibility for improving the sustainability of this sector.

The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:

1. Companies respect animal welfare in all Five Domains of animal welfare.
2. Severely restricted housing methods for farm animals, including calves in crates, hens in battery cages and sows in feeding cubicles, are unacceptable.
3. Companies limit the duration of animal transports in line with the FARMS Responsible Minimum Standards or equivalent international standards referenced herein.
4. Companies minimise use of pesticides.
5. Illegal, unreported or unregulated (IUU) fishing is unacceptable.
6. Destructive fishing methods (such as dynamite, cyanide-fishing, driftnets, deep sea bottom trawling, etc.) are unacceptable.
7. Fishers are certified according to the Marine Stewardship Council (MSC) criteria or comparable standards for fisheries in which they operate.
8. Fish farms are certified according to the Aquaculture Stewardship Council (ASC) criteria.
9. Companies are certified according to the criteria of the certification schemes for raw materials (mentioned in section 4.2.3 of the FFGI Methodology).
10. Companies publish a sustainability report that is set up in accordance with recognised sustainability reporting frameworks.
11. Companies integrate environmental, social and governance criteria in their procurement and operational policies.
12. Companies include clauses on the compliance with environmental, social and governance criteria in their contracts with subcontractors and suppliers.

4.2.2 What is at stake?

The right to food is one of the most basic human rights and is enshrined in the Universal Declaration of Human Rights (UDHR).[522] According to the Food and Agriculture Organisation of the United Nations (FAO), food security exists when "all people, at all times, have physical and economic access to sufficient, safe and nutritious food to meet their dietary needs and food preferences for an active and healthy life".[523] The food sector has an obvious and major role to play in safeguarding this right.

The food sector consists of agricultural companies, including small-scale family producers, food processing companies and retail companies. This diverse group of companies forms the food supply chain. The food processing sector includes "all companies that are engaged in processing food, as well as food commodity trading related to food processing and fish processing, and beverage companies. This includes a diverse group of companies involved in the processing of products like fish, meat, milk, crops, and water. It includes millions of Small and Medium Enterprises (SMEs) worldwide and also some of the largest companies in the world. Many of these companies deliver products directly to consumers, while others specialise in Business-to-Business activities (ingredients, commodity markets). Some companies directly participate in all areas of food production, from farming activities to final production and retail. Others are concentrated more at the top end of the production chain or buy through commodity markets".[524]

The demand for agricultural products is growing more rapidly than the world population. Consumption patterns in emerging markets increasingly resemble those in industrialised countries, with an increase in meat and dairy consumption globally. These changing consumption patterns drive up demand for raw agricultural materials used in livestock feed. Another cause of the growing demand for agricultural raw materials is the development of biofuel production. Biofuel is produced using palm oil, corn, and sugar cane as well as other food and feed crops.[525]

The sharp increase in the global demand for agricultural products is related to a host of significant economic, social, and environmental problems, which means that companies operating in food supply chains are facing major sustainability challenges.

One significant issue is that many agricultural companies do not comply with internationally recognised labour rights. For instance, according to estimates by the International Labour Organisation (ILO), around 60% of all child labourers work in agriculture.[526] Aside from child labour, there are countless examples in agriculture of forced labour, low wages and insufficient protection of the health and safety of employees.[527]

Land rights conflicts and forced evictions are another significant issue concerning food production and food security. Land grabbing occurs when foreign companies, countries, or investors buy or rent land for large-scale industrial and/or commercial agriculture production oriented on the export market at the expense of land rights of the local communities concerned. The lack of consultation and transparency in the allocation of land is a serious problem in developing countries. Evictions and conflicts over land are often paired with a violation of basic human rights and principles. As a result, people are not only deprived of their property and the right to use their land, but also of their familiar habitat, cultural riches and sources of food and income.[528] The reduced availability of land for local actors also shifts local economies away from traditionally sustainable modes of peasant agriculture towards dependence on commercial agriculture for global markets in feed, food, and biofuels.[529]

The growing demand for agricultural products is also a significant cause of biodiversity loss and the destruction of natural ecosystems worldwide.[530] Through the conversion of forests and other natural environments to commercial agricultural land, areas of high biodiversity that provide key ecosystem services and natural habitat for a wide array of species, are under increasing stress.[531] To make way for agricultural activities, forests are cut on a large scale, after which the remaining vegetation is burnt. This system is commonly known as *slash-and-burn*. It is mostly conducted by farmers, however these activities are sometimes connected to large industry players.[532] Major drivers include the livestock industry – with around 80% of global agricultural land dedicated to grazing land or cropland for animal feed[533] – and the growing market for biofuels.

The development of infrastructure such as roads, railways, and waterways that go hand in hand with the development of an export-oriented agriculture industry can have negative effects on ecosystems and local societies. For example, the construction of roads in forest areas facilitates access for poachers and illegal loggers. The construction of infrastructure can also lead to land rights conflicts and rising land prices for the original inhabitants.[534]

There are several concerns about the potential unintended health and environmental impacts of genetically modified organisms (GMOs). Examples include negative impacts on beneficial insects, weed tolerance, new allergens, and toxins. Furthermore, concerns also exist about the spreading of harmful traits to weeds and non-GM crops.[535] While there is an active debate about the safety of GMOs, it is the position of the Fair Finance International network that at this time GMOs should be avoided, as risks of contamination of other cultivated or wild varieties, as well as side-effects from the crossing of genes from entities that do not belong to the same natural category, cannot be excluded given the current state of scientific knowledge.

The intensive livestock industry is responsible for a large share of animal suffering worldwide. The welfare of animals in intensive farming systems is under pressure because the animals are kept in circumstances that are not suitable for the species and are not worthy of the animal's dignity. Intensively farmed animals, including pigs, poultry, beef and dairy cattle, rabbits, goats, and fish farmed in intensive aquaculture, are kept in high concentrations, often undergo un-anaesthetised surgery (cutting tails, clipping beaks, teeth filing, dehorning) and tend to lack the opportunity to behave naturally (grazing, free-ranging, grubbing). Intensive large-scale husbandry also increases the risk of spreading diseases.[536]

Other animal welfare aspects in the livestock sector deserving urgent attention are the conditions during the transport of animals over long distances and the conditions prior to and during the slaughter of animals. During transportation, animals may have to deal with bad ventilation, too little space, shortage of food and water, bad treatment during the loading and unloading procedures, bad health conditions of the animals prior to the transport and exposure to germs. Animal transport may, therefore, result in exhaustion, dehydration, anxiety, injury, and diseases, and may even lead to the death of the animals involved.[537] Slaughter methods in many countries pose severe concerns. Problematic slaughter methods include CO_2 stunning for pigs, electrical stunning for poultry via the water bath method and unstunned slaughter.[538]

Ignoring animal welfare and animal health also leads to increasing health risks for humans. Bacteria in humans, food and animals continue to show resistance to the most widely used antimicrobials. A 2017 report from the European Food Safety Authority, the European Medicines Agency and the European Centre for Disease Prevention confirms the link between antibiotic consumption and antibiotic resistance in both humans and food-producing animals. Reducing the unnecessary use of antibiotics will have an impact on the occurrence of resistance.[539] Because the routine use of antibiotics is instrumental for livestock being reared in densely packed and often unhygienic conditions, a change in animal housing and husbandry practices is necessary to effectively eliminate or reduce the use of antibiotics.[540]

According to the Intergovernmental Panel on Climate Change (IPCC), agriculture and deforestation (which is largely driven by the expansion of agricultural land) are responsible for around a quarter of global greenhouse gas (GHG) emissions.[541] The IPCC estimated that in 2019, approximately 22% of total net anthropogenic GHG emissions came from agriculture, forestry and other land use (AFOLU).[542]

Peatlands are frequently drained and burned to make room for plantations, often for the production of palm oil. This generates substantial greenhouse gas emissions and serious health risks for local and regional populations.[543] Deforestation plays a crucial role in the discussion about biofuels. Biofuel production is responsible for deforestation, not only directly but also through the process of indirect land use change (ILUC), where biofuel crops are typically grown on land normally used for food production, displacing primary food production to previously unused areas.[544] Several studies have indicated that when ILUC is taken into account, there is no positive climate impact from first-generation biofuels. Especially those pushing the rangeland frontier into the Amazonian forests, could offset the carbon savings from biofuels.[545]

The livestock sector is another important source of agriculture-related direct and indirect GHG emissions. The rising demand for animal protein is a significant driver of emissions from land use change, as forests are converted to cropland for feed production or grazing. The animals themselves, especially cattle, emit methane (CH_4) as they digest their food. The FAO calculated in

2013 that a significant reduction of greenhouse gas emissions is possible if farmers adopt so-called best practices.[546] Other sources of agricultural GHG emissions include nitrous oxides (N_2O) from the application of manure and nitrogen fertilizers and CH_4 from rice paddies.

Particularly through the impacts of their supply chains on deforestation and land use change, the world's ten largest food companies are responsible for the annual emissions of hundreds of millions of tons GHGs. The implementation of best practices by these companies in their procurement policies, and the promotion of best practices to their suppliers, therefore has significant climate change mitigation potential.[547]

The widespread use of pesticides presents a series of environmental and health risks, such as pollution of water sources and ecosystems by agricultural runoff, the development of pesticide-resistance, and potential health risks for agricultural workers, surrounding communities and consumers. Another problem is the impact of broad-spectrum pesticides on beneficial insects and pollinator species. Along with other factors such as loss of biodiversity and habitat change, pesticide use forms a serious threat to bees and other pollinating insects. About ninety agricultural products, accounting for a third of the global food production, depend on animal pollination.

Agriculture is also the largest user of freshwater resources, using up to 90% of available freshwater in developing countries. The production of animal-based foods alone accounts for almost half of global freshwater withdrawals.[548] At the same time, the contribution of the livestock industry to water pollution through antibiotics, hormones, sediments, fertilisers, pesticides, and other chemicals is very high.[549]

The macroeconomic effects of the international trade in agriculture and livestock products are often detrimental for developing countries due to the often unfavourable terms of trade for these countries, the agriculture subsidies in richer countries and the dumping of subsidised agricultural products in developing countries. This leads to an unfair balance of power in the entire production, distribution, and consumption chain. Due to a strong increase in food prices in recent years, more and more people in developing countries are living below the poverty line.[550] While the number of people suffering from hunger significantly decreased over the period from 1990-2015, in recent years this trend has seen a reversal. FAO figures indicate that in 2021, as many as 828 million people were undernourished.[551] Population growth and climate change are expected to put significant additional stress on global food security. Substantial changes in policy and management throughout the entire agricultural production chain are required to ensure that the available water resources are used in the best way possible, to meet growing demands for food and other agricultural products.

To offer a sufficient and nutritious diet to global populations and to enable socio-economic development of poorer countries, unfavourable terms of trade in agricultural products for developing countries have to be addressed and distorting subsidies and dumping practices have to be prohibited.[552] In addition, the use of agricultural fields for the production of biofuels and animal feed has to be discouraged, as it displaces food production for the local population and poses a threat to their right to food security.[553]

The topic of food is central to SDG 2: Zero Hunger. The goal targets to ensuring everyone has access to nutritious and sufficient food. It further targets to double the agricultural yield and income of small scale food producers by providing access to productive resources and inputs, knowledge, financial services, markets and opportunities for value addition and non-farm employment. Another target is to ensure sustainable food production systems that help maintain ecosystems and strengthen capacity for adaptation to climate change, extreme weather, drought, flooding, and other disasters and that progressively improve land and soil quality.[554] SDG 3: Good Health and Well-being is also related to good quality, nutritious food for everyone. Further, as mentioned in earlier paragraphs, agriculture as a part of food sector has many issues that directly impact SDG 1: No Poverty, SDG 10: Reduced Inequalities, SDG 12: Ensure Sustainable

Consumption and Production Patterns, SDG 13: Climate Action, SDG 14: Life Below Water, and SDG 15: Life on Land.[555]

Feeding a growing world population - reaching 9-10 billion people in 2050 - in a sustainable way is one of the major challenges the world is facing. Food security is not only based on global production volumes, but also on access, equality, and absence of conflict.[556] All parts of the chain within the food industry - from farmers, middlemen, transporters, and processing companies to supermarkets - will have to make an effort in this. Financial institutions that invest in or finance companies at all stages of food chains should develop policies that take all above mentioned problems into account. When developing an investment policy for this sector, financial institutions can make use of the international standards described in the following section.

4.2.3 International standards and initiatives

In recent years, various initiatives have been set up to develop standards for the agriculture and livestock sectors and the food (processing) industry. Some initiatives focus on general, sector-wide agreements, while others focus on specific crops. The main international standards on food and agriculture are summarised per topic, followed by the assessment elements that are formulated by the FFGI Methodology as a result:

- **Labour rights**

  The circumstances for health and safety in the agriculture and food industry are often below standard due to the use of huge amounts of pesticides that are used. Wages are generally low and negotiating rights are often not respected. It is therefore of great importance that agriculture and food companies adhere to the main ILO conventions, summarized in section 0, such as the 1998 ILO Declaration on Fundamental Principles and Rights at Work and the Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy (MNE Declaration).

  Assessment elements regarding labour rights are covered in the cross-cutting theme Labour rights (section 2.6).

- **Land rights conflicts and forced evictions**

  Human rights, particularly economic, social, and cultural (ESC) rights, play a central role in land-related issues. However, there is no explicit recognition of a 'human right to land' within international human rights instruments. Those who face threats to their land rely on other rights, such as the right to food, the right to water, the right to housing and the right to work. These rights are included in the 1976 International Covenant on Economic, Social and Cultural Rights (ICESCR). Women's land rights and indigenous peoples' land rights are also recognised in:

  - ILO Convention concerning Indigenous and Tribal Peoples (No. 169), Articles 6, 7, 16 and 22;
  - The Convention on the Elimination of all forms of Discrimination against Women (CEDAW), Article 14; and
  - The United Nations Declaration on the Rights of Indigenous Peoples Article 10.

  More standards and assessment elements regarding land rights and forced evictions are covered in the cross-cutting theme Human rights (section 2.5).

- **Areas of high biodiversity and protected areas**

  Agricultural activities may not take place in areas listed in the categories I to IV of the International Union for Conservation of Nature (IUCN), in the UNESCO World Heritage Convention, or in the Ramsar Convention on Wetlands. Furthermore, developing new agricultural activities in areas that are identified by one of the following classifications is to be avoided:

- Forests identified with the High Carbon Stock Approach;
- Marine Protected Areas; and
- High Conservation Value areas.

In December 2022, the European Union adopted a Regulation on deforestation-free supply chains to curb EU-driven deforestation and forest degradation. It aims to guarantee that the agricultural and forestry products that EU citizens consume on the EU market do not contribute to deforestation and forest degradation within the EU and globally.

More standards and assessment elements regarding biodiversity are covered in the cross-cutting theme Biodiversity (section 2.1).

- **Protection of genetic material**

  The FAO's Commission on Genetic Resources for Food and Agriculture has observed that the management of genetic resources, the primary biological capital for livestock development and vital to food security and sustainable rural development, has been neglected. This has resulted in a substantial erosion of genetic diversity. The FAO's Second Report on the State of the World's Animal Genetic Resources for Food and Agriculture provides a "comprehensive assessment of the state of livestock biodiversity and its management". The key findings of the report include: "Livestock diversity facilitates the adaptation of production systems to future challenges and is a source of resilience in the face of greater climatic variability; […] The roles and values of animal genetic resources remain diverse, particularly in the livelihoods of poor people; and […] Emerging technologies are creating new opportunities and challenges in animal genetic resources management".

  More standards and assessment elements regarding the protection of genetic material are covered in the cross-cutting theme Biodiversity (section 2.1).

- **Animal welfare**

  The concept of the Five Freedoms are often taken as a starting point for preparing standards on animal welfare. This concept arose from the Brambell Report published in Great Britain in 1965 and the following request of the UK Minister of Agriculture to the Farm Animal Welfare Council (FAWC) to revise the *Welfare Codes* for cattle, pigs, domestic fowl, and turkeys. This has led to the following list of five freedoms that are relevant for all animals.

  An animal has to live free from:

  - Hunger, thirst and malnutrition (direct access to fresh water and solid food to stay healthy and strong);
  - Any thermal or physical discomfort (having suitable, comfortable housing that offers tranquillity);
  - Pain, injury, and diseases (by means of prevention or diagnosing and treating quickly).
  - Fear and chronic stress (by circumstances that avoid suffering and stress); and
  - The denial of natural (species-specific) behaviour (by supplying sufficient space, sufficient and proper provisions, and company from animals of the same species).

  To improve on the Five Freedoms model, scientists and animal welfare organisations have since 1994 proposed another framework: the Five Domains of Animal Welfare. This model moves away from the idea that animal welfare can be adequately guaranteed merely by the absence of negative states. Instead, the Five Domains model focuses on the different factors that can positively or negatively affect animals' mental state. The Five Domains are:

  - Nutrition;
  - Environment;

- Health;
- Behaviour; and
- Mental state.

In the European Union, Council Directive 98/58/EC concerning the protection of animals applies to all farm animals and lays out several general animal welfare requirements with respect to, amongst others, freedom of movement, accommodation, feed and breeding practices. Furthermore, directives from the Council have been adopted on animal transport (EC No 1/2005), as well as on the keeping of specific species of animals (broilers, laying hens, pigs, calves). Regulations on slaughter (EU Regulation 2018/723) have also been issued by the European Commission. In recent years, out of discontent with the inability of EU standards to safeguard animal welfare, private standards and initiatives have emerged.

Coller Capital initiated the Farm Animal Investment Risk and Return (FAIRR) initiative, which aims to improve investor's understanding of risks related to factory farming. FAIRR states that "animal factory farming is exposed to at least twenty-eight environmental, social and governance issues that could significantly damage financial value over the short or long-term. Many of these risks are currently hidden from investors".

The Farm Animal Responsible Minimum Standards (FARMS) were developed in 2019 and updated in 2021 by a coalition of animal welfare organisations, and emphasize the role of financial institutions in advancing animal welfare in farm animals. Based on the Five Freedoms, the OIE Terrestrial Health Code, existing EU legislation and the IFC's Good Practice Note, the FARMS initiative identifies a number of 'welfare risks' and mitigation strategies that apply to all farm animals, covering a range of topics including:

- Space;
- Stocking density;
- Living environment;
- Diet;
- Breeding practices;
- Painful procedures;
- Transport;
- Slaughter.

Additionally, the FARMS initiative defines a host of minimum standards specific to five of the most commonly farmed animals (dairy cows, beef cattle, broiler chickens, laying hens and pigs). By combining previous governmental regulations and private initiatives, the Responsible Minimum Standards (RMS) provide a comprehensive set of principles for improving welfare in farm animals.

For more information and relevant international standards and initiatives see the theme Animal Welfare (section 2.8).

This leads to assessment elements	
1	Companies respect animal welfare in all Five Domains of animal welfare.
2	Severely restricted housing methods for farm animals, including calves in crates, hens in battery cages and sows in feeding cubicles, are unacceptable.
3	Companies limit the duration of animal transports in line with the FARMS Responsible Minimum Standards or equivalent international standards referenced herein.

- **Antimicrobial resistance**

According to the World Health Organisation (WHO), antimicrobial resistance (AMR) is one of the biggest threats to global health, food security, and development today. As antibiotics become less effective a growing list of infections are becoming difficult and sometimes impossible to treat. Because the routine use of antibiotics is instrumental for livestock being reared in densely packed and often unhygienic conditions, a change in animal housing and husbandry practices is necessary to effectively eliminate or reduce the use of antibiotics.[557]

Relevant international standards and assessment elements are included in the theme Health (section 2.9).

- **Pesticides**

  With respect to the use of pesticides, the FAO released an International Code of Conduct on the Distribution and Use of Pesticides in 2003. This code of conduct includes voluntary, internationally accepted norms for the treatment, storage, use and the disposal of pesticides.

This leads to assessment element	
4	Companies minimise use of pesticides.

- **Water use**

  Given the immense amounts of freshwater being used to produce food globally, amidst growing shortages, it is important that this is done as efficiently as possible. It is vital that agricultural and livestock companies and financial institutions become aware of their own influences on water related problems. Various initiatives, guidelines and standards have emerged in recent years, to help companies address water risk.

  The discussion of standards and assessment elements regarding water use is covered in the cross-cutting theme Biodiversity (section 2.1)

- **Illegal, unregulated, and unreported fishing (IUU)**

  The FAO-IUU Plan of Action seeks to prohibit illegal, unregulated, and unreported fishing practices by convincing countries not to do business with companies that are guilty of IUU fishing. This includes regulations with regard to sailing under 'flags of convenience' (FOCs). FOCs enable IUU fishing and also present major labour rights problems. So-called 'FOC countries' allow fishing vessels to fly their country's flag for no charge, without taxation, and do not address any violations of international fisheries laws.

  FOC fleets are especially active in fishing for commercially valuable species and are also involved in poaching fish in waters of developing coastal countries, which do not have the means to patrol their waters, resulting in negative impacts on local fish stocks, employment, and food security.[558] In terms of labour issues, FOC fleets typically have very low wages and very bad labour and safety conditions on board. Furthermore, FOC registries make it much more difficult for unions, industry stakeholders and the public to hold ship owners to account.[559]

This leads to assessment element	
5	Illegal, unreported or unregulated (IUU) fishing is unacceptable

- **Harmful fishing and processing techniques**

  The FAO Code of Conduct for Responsible Fisheries sets a clear priority for the use of selective and environmentally friendly fishing gear and techniques. The Code proposes to prohibit the use of irresponsible fishing techniques and in addition requires that the effects of new fishing techniques on living environments are assessed before they are marketed. Also, international standards are drafted that restrict or prohibit the use of certain methods and materials, such as the use of explosives and cyanide, the use of drift nets,[560] the use of trawls in deep seas and so-called *shark-finning*, where shark fins are cut off and the sharks are thrown back into the ocean.[561]

This leads to assessment element	
6	Destructive fishing methods (such as dynamite, cyanide-fishing, driftnets, deep sea bottom trawling, etc.) are unacceptable

- **Certification of sustainable fisheries**

  The leading organisation on certifying sustainable fisheries is the Marine Stewardship Council (MSC). The MSC certification standards are based on the FAO Code of Conduct for Responsible Fisheries and are the only global standards that are consistent with the 2009 FAO Guidelines for the Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries.

  The MSC principles and criteria were established in 1999 in an international multi-stakeholder process. As per February 2022, 446 fisheries representing 17% global wild marine harvest, were certified as sustainable to the MSC Fisheries Standard.[562] As MSC does not provide certification for all types of fisheries, MSC certification for those fisheries cannot be required.

This leads to assessment elements	
7	Fishers are certified according to the Marine Stewardship Council (MSC) criteria or comparable standards for all fisheries in which they operate.

- **Sustainable aquaculture**

  The Global Aquaculture Alliance (GAA), an initiative of a number of American companies, has developed the Best Aquaculture Practices (BAP) facility certification standards, monitored and controlled by ISO 65-accredited certification bodies. BAP certification defines the most important elements of responsible aquaculture and provides quantitative guidelines by which to evaluate adherence to those practices for processing plants, farms, hatcheries, and feed mills. The BAP includes standards for shrimp, tilapia, and channel catfish cultivation, as well as for the fish processing industries. In this system animal welfare criteria have been incorporated, applying mainly to pain and anxiety. BAP is mainly active in the Americas, South East Asia, Australia and New Zealand; within Europe only in Iceland, Norway and the United Kingdom.

  In 2010, WWF and IDH (Dutch Sustainable Trade Initiative) founded the Aquaculture Stewardship Council (ASC). The ASC aims to be the world's leading certification and labelling programme for responsibly farmed seafood, by managing the global standards for responsible aquaculture, which were developed by the WWF Aquaculture Dialogues. It developed standards for responsible aquaculture. The current eleven ASC standards cover 17 species groups including abalone, bivalves, salmon, shrimp and tilapia. There is also a joint ASC-MSC standard for seaweed.

  ASC collaborates with aquaculture producers, seafood processors, retail and foodservice companies, scientists, conservation groups and consumers in order to: [563]

  - Recognise and reward responsible aquaculture through the ASC aquaculture certification programme and seafood label;
  - Promote best environmental and social choice when buying seafood; and
  - Contribute to transforming seafood markets towards sustainability.

This leads to assessment elements	
8	Fish farms are certified according to the Aquaculture Stewardship Council (ASC) criteria.

- **Standards for specific crops**

  Guidelines have been developed for sustainable production and trade for a number of important agricultural products. These guidelines, with the objective to reduce social and environmental problems, are drafted by so-called multi-stakeholder initiatives and roundtables, in which researchers, companies from industries involved, financial institutions, social organisations, and other stakeholders participate. In recent years, the roundtables have defined more and clear standards for the sustainable production of specific crops. Until now multi-stakeholder initiatives for some agricultural products are still lacking, but norms are being drafted by the industry itself. Until these norms have been developed further in consultation with all stakeholders, they are not to be considered as real sustainability norms; but they do offer some guidance in the assessment of companies that produce these agricultural products.

The main examples of norms for specific agriculture crops are:

- **Soy**: If not managed adequately, large scale soy farming causes huge social and environmental damage, particularly in Latin America. Clear norms and guidelines are described in the 2004 Basel Criteria for Responsible Soy Production, developed by the WWF and ProForest for Coop Switzerland. The Basel Criteria require certified, non-GMO soy to be farmed and traded separately, as long as the largest part of the market does not comply with these requirements. The Basel Criteria are also followed in the globally used ProTerra Standard published in 2014.

  In 2006, private companies and stakeholders came together to sign the Amazon Soy Moratorium, a voluntary agreement to ensure that Brazilian soy is only grown on existing agricultural land and does not drive further deforestation in the Amazon. The agreement has been credited with drastically reducing deforestation due to soy production in the Brazilian Amazon, and was renewed indefinitely in 2016.[564] Although former president Bolsonaro decreased much of the government's enforcement capacity and Brazilian farmers called to end the Amazon soy moratorium [565], conversion in the Amazon biome is now mostly driven by the expansion of cattle ranching.[566]

  Meanwhile, the Brazilian Cerrado biome has seen increased deforestation for soy cultivation in recent years.[567] A similar approach was therefore called for in the 2017 Cerrado Manifesto, which brought together many CSOs and several large companies in advocating measures to prevent destruction of the Brazilian Cerrado region due to soy production.

  The Roundtable on Responsible Soy Association (RTRS), established by organisations and companies in the soy industry, aims to stimulate 'more responsible' production of soy. The first RTRS Standard came into force in June 2010 and recognises the environmental and social problems in the soy chain. The fourth version of the RTRS Standard dates from December 2021, and the next version will be published in May 2025.

  Other standards include the Sustainable Agriculture Network Standard, Fairtrade Production and Trade Standards, standards for organic farming and the Social Responsibility Criteria for Companies that Purchase Soy and Soy Products developed in 2004 by the Brazilian Soy Platform. The latter document also places a clear responsibility on financial institutions and other lenders that are involved in financing soy producers. Civil society organisations (CSOs) united in the Dutch Soy Platform believe that sustainable soy production cannot be achieved without a significant reduction in meat and dairy consumption in Europe, as well as a shift towards European farmed crops as cattle feed instead of imported soy.

- **Palm oil:** The Roundtable on Sustainable Palm Oil (RSPO) - a multi-stakeholder initiative with thousands of members - adopted the first version of its Principles and Criteria for Sustainable Palm Oil Production (P&C) in October 2007. The P&C is comprised of clear norms on environmental aspects (use of soil, water, chemicals) and social environment (land rights, working conditions, etc.). The norms are based on United Nations, the FAO, and the ILO guidelines.

In 2013, the Palm Oil Innovators Group (POIG) was established. Within POIG a couple of CSOs (amongst whom WWF and Greenpeace) work together with palm oil companies in order to improve the RSPO standards. In 2016, RSPO introduced additional criteria under the name RSPO NEXT. The latest version of the RSPO Principles and Criteria was adopted in 2018, which are to be reviewed every five years, and includes new criteria aimed at halting deforestation, planting on peat, and enhancing human rights protection.[568] In 2019, the RSPO published the RSPO Independent Smallholder Standard, to improve the inclusion of smallholders. And in 2020, the RSPO published the RSPO Supply Chain Certification Standard. The RSPO Principles and Criteria and the RSPO Independent Smallholder Standard were reviewed through a multi-stakeholder consultation process and officially adopted in November 2024. The revised standards will be effective 12 months after adoption.[569]

In recent years, several large companies, have adopted 'No Deforestation, No Peat, No Exploitation' (NDPE) policies. These policies set a high benchmark, aiming for no deforestation, no peat development, and no exploitation, in their own operations or in their supply chain. Financial institution may apply the policies to the palm oil sector, as well as to other sectors exposed to deforestation, peat loss and exploitation.[570]

The 2015 Free and Fair Labor in Palm Oil Production: Principles and Implementation Guidance urges companies to ensure the rights of palm oil workers. It is not intended as a new code of conduct but as a resource that provides companies with detailed implementation guidance. The publication expects companies to adhere to the following seven principles throughout their supply chain:

- The International Labour Organisation (ILO) Core Conventions are upheld;
- Ethical hiring and responsible employment are practiced;
- Reasonable production targets, working hours, and leave entitlements are established;
- A living wage is paid;
- Worker health and safety and the welfare of workers and their families are prioritized;
- Access to remedy is guaranteed; and
- Commit to meaningful due diligence, transparency, and disclosure of human rights policies, procedures, and data, with a focus on labour and employment.

Other standards that are relevant for palm oil are the Rainforest Alliance / SAN-standards as well as the International Sustainability Standard (ISCC)International Sustainability Standard (ISCC) which was developed in 2006 through a multi-stakeholder process involving representatives from agriculture, processing and refining industry, trade as well as NGOs. ISCC applies rules for the conservation of valuable landscapes as well as environmentally friendly and socially responsible production of agricultural and forestry raw materials. ISCC is applicable for various sectors and end-market including palm oil.

- **Sugarcane**: Beside its use in the food industry, sugar cane is increasingly being used as a raw material for biofuel ethanol. The sugar industry uses huge areas of agricultural land and large quantities of water. The multi-stakeholder group Bonsucro unites a number of large companies and other stakeholders in the industry. Bonsucro's objective is to develop international guidelines for sustainable production of sugar cane that can be used by companies and investors worldwide, as well as a certification system. The latest update of the Bonsucro Production Standard, version 5.2 dates from July 2023. The standard is comprised of social, environmental, and economic norms, focusing on labour rights, the production process, and the environment. Fairtrade International also has a Product Standard for Cane Sugar, which certifies small-scale producer organisations.
- **Biofuels:** See section 2.2.3 in the Climate Change chapter.

- **Cocoa**: In 2001, the Harkin Engel Protocol was drafted to prevent the worst types of child labour on cocoa plantations. Yet, in recent years various examples of child labour on African cocoa plantations have come to light. The chain also suffers from unequal power relations, which leads to small cocoa farmers not receiving reasonable prices. In October 2007 the first meeting of the Roundtable on a Sustainable World Cocoa Economy was held in which farmers, traders, processing companies, governments and social organisations talked about the development of sustainability norms for the cocoa industry. Some certification labels for sustainable cocoa are: Fairtrade International's Product Standard for Cocoa, the IFOAM Organic Standard, and Sustainable Agriculture Network's (SAN) Additional Criteria and Indicators for cocoa (2005). Rainforest Alliance and Utz have merged in 2018 and published a joint certification scheme in 2020.
- **Coffee**: Organisations like Fairtrade International and Rainforest Alliance have been involved in the certification of coffee for many years. Fairtrade International particularly focuses on small coffee producers and establishes minimum prices for these farmers and it has a Product Standard for Coffee, aimed at small coffee producers. The Global Coffee Platform (GCP), a group of over 150 stakeholders in the coffee supply chain, drafted the Common Code for the Coffee Community (4C) in 2014. The 4C code provides an extensive framework in which both environmental and economic aspects, as well as social problems within the coffee industry, are covered. For 50 years, the International Coffee Organisation (ICO) has developed standards for responsible coffee. However, the topic of sustainability is only briefly mentioned in the International Coffee Agreement 2022 and does not really include standards but just a basic principle for member to promote a sustainable coffee sector.
- **Tea:** Tea production is labour intensive and the industry creates jobs in very remote rural areas. Globally, millions of people depend on the production of tea for their income. The price of tea on the world market has fallen dramatically in the past twenty years and, partly due to this, large social problems have arisen in the production of tea. Since 1997 the Ethical Tea Partnership, a joint industry initiative of traders and packers, monitors working conditions on large plantations. The main certification systems are Fairtrade, that revised its Tea Standards in 2021. Rainforest Alliance and Utz jointly developed a certification program 2020 after they merged.
- **Other norms:** Fairtrade International Standards cover a wide range of products, also including flowers, nuts, rice among other. Fairtrade International has set Product Standards for small-scale producers, for hired labour organisations, contract production, and traders. The Sustainable Agriculture Initiative Platform, founded by multinationals in the agricultural industry, develops tools and guidance to support global and sustainable sourcing and agricultural practices.

The list described above is not an exhaustive overview of all the certification schemes and agricultural crops. The initiatives are in various stages of development and have gained different levels of support. In most industries, effective verification and control systems still have to be developed so that progress can be measured. Some initiatives already offer reliable norms on which a policy of financial institutions can be based and others provide starting points.

This leads to assessment elements	
9	Companies are certified according to the criteria of the certification schemes for raw materials (mentioned in section 4.2.3 of the FFGI Methodology).

- **Sustainability reporting**

The best known guidelines for sustainability reporting in general are the Global Reporting Initiative (GRI) Standards. The new GRI Universal Standard was released in 2021, which will be complemented by various *Sector* and *Topic Standards*.[571] In June 2022, the Sector Standard for Agriculture, Aquaculture and Fishing has been released.

This leads to assessment elements	
10	Companies publish a sustainability report that is set up in accordance with recognised sustainability reporting frameworks.

- **Procurement and supply chains**

Companies are often part of long procurement and supply chains. They can monitor one another and question how they respect local and national legislation and international norms regarding social, economic, and environmental issues. The requirements that companies set for their suppliers can be included in contractual agreements. The importance of this also recognised in the OECD Guidelines for Multinational Enterprises, and more specifically in the OECD-FAO Guidance for Responsible Agricultural Supply Chains. It establishes a common understanding of due diligence in the sector to help companies meet the due diligence expectations laid out in the OECD Guidelines for Multinational Enterprises. It includes a model enterprise policy outlining the company standards, a framework for risk-based due diligence, a description of the major risks faced by enterprises and guidance for engaging with indigenous peoples.

The ISO 26000:2010 Guidance on social responsibility, last reviewed in 2021, recognises the importance of supply chain responsibility, because "the impacts of an organisation's decisions or activities can be greatly affected by its relationships with other organisations".[572] A company's sphere of influence includes relationships within and beyond an organisation's supply chain. Moreover, the ISO 26000:2010 Guidance on social responsibility recommends setting contractual provisions or incentives as a means of exercising influence.[573]

In addition, ISO 20400:2017 Sustainable procurement – Guidance provides guidelines for organisations, independent of their activity or size, on integrating sustainability within procurement, as described in ISO 26000:2010 Guidance on social responsibility. It is intended for stakeholders involved in, or impacted by, procurement decisions and processes.

The United Nations Guiding Principles on Business and Human Rights include a due diligence process in order to identify, prevent, mitigate and account for how companies address their adverse human rights impacts. The process "should cover adverse human rights impacts that the business enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships."[574]

A useful tool for companies is the FAO-OECD Guidance for Responsible Agricultural Supply Chains. The Guidance "has been developed to help enterprises observe existing standards for responsible business conduct along agricultural supply chains. These standards include the OECD Guidelines for Multinational Enterprises, the Principles for Responsible Investment in Agriculture and Food Systems, and the Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security. Observing these standards helps enterprises mitigate their adverse impacts and contribute to sustainable development".[575] Furthermore, the Guidance contains a step-by-step model for implementing supply chain due diligence in the agricultural sector.

This leads to assessment elements	
11	Companies integrate environmental, social and governance criteria in their procurement and operational policies.

12	Companies include clauses on the compliance with environmental, social and governance criteria in their contracts with subcontractors and suppliers.

4.3 Forestry

4.3.1 Assessment elements

Financial institutions can use their influence to prevent deforestation and forest degradation, by establishing a strict policy for investments in the forestry sector. This policy applies to the entire forestry sector, being forestry, logging, pulp, paper, and furniture production as well as other wood processing, trading and importing companies.

The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:

1. Companies prevent negative impacts on High Carbon Stock (HCS) areas within their business operations and the forests they manage.
2. Companies throughout the wood supply chain prevent the use of illegally cut and traded timber.
3. Pulp and paper factories restrict the use of chemicals and the pollution of soil, water, and air by making use of the best available techniques.
4. Companies respect the rights of local and indigenous communities on the fair and equal use of forests.
5. Production forests and timber plantations are certified according to the Forest Stewardship Council (FSC) forest management certification.
6. Supply chains of timber traders and companies in the wood product chain (including pulp, paper, veneer, furniture) are certified according to the FSC chain of custody certification.
7. Companies in industries with a large impact on forests (including in any case the forestry and paper industry), report their forest related information to the Carbon Disclosure Project (CDP) Forest Program.
8. Large enterprises and multinational enterprises publish a sustainability report that is set up in accordance with recognised sustainability reporting frameworks
9. Companies integrate environmental, social and governance criteria in their procurement and operational policies.
10. Companies include clauses on the compliance with environmental, social and governance criteria in their contracts with subcontractors and suppliers.

4.3.2 What is at stake?

About 30% of the Earth's land surface - almost 4 billion hectares - is covered with forests.[576] Of this, about 271 million hectares are timber plantations, which have an entirely different function.[577] The term 'forest' includes, but is not limited to, natural forests and forest plantations as described by the Convention on Biological Diversity (CBD).

The forestry sector consists of all companies that manage forests and the companies that process timber (lumber, pulp, paper, and other wood products). The forestry industry is also comprised of all companies that are involved in trade and the further processing of these products, such as furniture, biomass and paper, and therefore includes long supply chains with many different companies.

Forests and plantations play an important role in the Earth system and provide people with a variety of goods and services:

- Hundreds of millions of people consider the forest to be their home: their social, cultural, and economic wellbeing is inextricably connected with the forest and the products they find there.[578] While it is difficult to estimate exactly how many people depend on forests for their livelihoods, some estimates place this number at over 1.5 billion people.[579] Important differences exist between those who live inside forests, those who live near forests and those who are engaged in commercial activities that rely on forests. These categories also overlap and vary along with the definition of 'forest'.[580]

- Forest ecosystems are the most biodiverse ecosystems on earth, offering shelter to more than two thirds of all animals and plants living on land.[581]
- Since trees grow by extracting CO_2 from the atmosphere, untouched forests serve as carbon storage and are therefore invaluable with regard to climate protection.[582] The IPCC estimated that in 2019, approximately 22% of total net anthropogenic GHG emissions came from the agriculture, forestry and other land use (AFOLU) sector.[583]
- Forests provide important ecosystem services by enhancing the fertility of the soil, protecting reservoirs, and reducing the risk of natural disasters such as floods and avalanches because they hold water resources and prevent soil erosion. These properties have a positive effect on global agricultural productivity and human health.[584]
- Forests provide valuable products for the world economy, as it provides timber and other products, such as edible nuts and fruit, medicinal plants, fibres, and rubber.[585] The economic importance of the informal, local trade in timber and other forest products is likely to be much higher. Hence, the loss of forests implies significant costs for the world economy, with some estimates putting the cost of deforestation and forest deterioration in the trillions of US dollars for the world economy.[586]
- Small scale and informal forestry and agroforestry are usually an important source of employment. However, there is a great deal of variation between types of forestry work, within different kinds of forestry work and also between regions.[587]

Despite their importance for human beings and nature, forests are still being destroyed at unprecedented speed. The annual rate of deforestation in the period 2015-2020 was estimated by the Food and Agriculture Organisation (FAO) at 10 million hectares.[588] Besides outright deforestation, the overexploitation of forests also drives *forest degradation*, whereby forests lose their richness in biodiversity and parts of their social and ecological functions.

Deforestation and forest degradation deprive local communities of their territory and livelihood, lead to loss of biodiversity, soil erosion and a decrease in the surface and groundwater table. In addition, deforestation activities sometimes cause horrible forest fires. Due to air pollution caused by these fires, people can suffer from respiratory problems - such as asthma, bronchitis, and pneumonia - as well as other consequences of the fires, such as eye and skin problems. Most forest fires are caused by the destruction of forests for the purpose of expansion of the large-scale pulp industry, soy and palm oil plantations and cattle ranching.[589]

Important causes of deforestation and forest degradation are:

- **Non-sustainable and illegal logging.** Non-sustainable logging occurs when forests are cut down so fast that recovery is impossible. Not all unsustainable logging is illegal, because forestry regulations in many countries fail to take sustainability into account. At the same time, not all types of illegal logging are non-sustainable, such as the small-scale logging by population groups that live in the forest and depend on small-scale agricultural activities (shifting cultivation).

  Illegal logging and forest crime has an estimated annual cost of billions of USD. It is estimated that 50 to 90 % of timber in some tropical countries has been logged illegally or originates from illegal sources.[590] Governments would have been able to use this money for the improvement of health provisions, education, and other public services or for the improvement of sustainable forest management systems.

Non-sustainable logging often causes great damage to the environment. Due to the conversion of forests and other bio-diverse areas into timber plantations and secondary (degenerating) forests, biodiversity is lessened.[591] In addition, legal (but non-sustainable) logging exposes the forest to illegal logging and poaching when infrastructure is created.

Non-sustainable logging has negative consequences for the livelihood of population groups that depend on forests. Many of these groups are among the poorest and most oppressed communities in the world. In some forest-rich countries, the forestry industry is very corrupt. Private allocations of licenses and payment for these services by large scale logging companies have increased to such an extent that national legislation is being undermined. As a result, democratic governance and attention to human rights have come under pressure. In some cases the illegal exploitation of forests has been directly linked to large-scale violent conflicts (such as in the Democratic Republic of Congo).[592]

- **Conversion of natural forests into timber and pulp plantations.** One of the main causes of deforestation is the establishment of large-scale pulp, paper, and veneer factories. These companies often fail to make sure their timber supply comes from sustainably managed sources. Often, large areas of natural forests are cut down to make room for timber plantations that use fast-growing types of trees. Although timber plantations are sometimes classified as forests - for example in the annual FAO report on the state of the world's forests - they do not offer the same social and ecological functions as natural forests.

  A large share of global logging is destined for industrial paper use and pulp factories. The huge monoculture plantations needed to supply modern pulp factories with raw material have serious consequences for biodiversity, water quality, land rights and income provision. Moreover, the factories themselves are very polluting. Stimulated by financial institutions, the industry constructs larger factories than needed, as it is easier to obtain financing for a large factory than for a small one. Financial institutions can therefore exert significant influence in determining which projects ultimately go ahead.[593]

- **Conversion of forests for agriculture.** Agricultural activities in livestock farming and the production of palm oil, soy, and other crops (for food, feed, and biofuel) increasingly use larger and larger land areas. To make way for agricultural activities, forests are cut on a large scale, after which the remaining vegetation is burnt. According to the Food and Agriculture Organization of the United Nations (FAO), "agricultural expansion drives almost 90 percent of global deforestation – an impact much greater than previously thought".[594]
- **Conversion of mangroves for fish farming.** Mangrove forests in tropical coastal regions are often destroyed to enable large-scale fish and shellfish growing.[595]
- **Development of large-scale industrial and infrastructure projects.** Forests are destroyed for the development of industry and infrastructure such as roads, railways, channels, dams, mines, oil and gas exploration and production and pipelines.[596]

The issues related to forestry are central to SDG 15: Life on Land. It aims to implement sustainable forest management practices, stop all kinds of deforestation, and promote reforestation SDG 15: Life on Land also encourages mobilising resources to finance sustainable forest management practices in developing countries.[597] Forestry as an industrial sector is also a hurdle in achieving SDG 13: Climate Action. Indirectly, land issues can be a threat to SDG 1: No Poverty and SDG 10: Reduced Inequalities.[598]

Given the socio-economic and ecosystem value of the world's forests and the outsized influence of the forestry sector on it, financial institutions should have an investment policy specifically dedicated to forestry in addition to investment policies for other industries related to deforestation and forest degradation (such as agriculture, fishing, and mining). Financial institutions should develop a stringent investment policy to ensure that they only invest in or finance companies and governments that manage their forests in a way that is not only ecologically sound but also beneficial to local societies. When developing a policy for this industry, financial institutions can make use of the international standards described below.

4.3.3 International standards and initiatives

The main international standards on the forestry industry are summarised per topic, followed by the assessment elements that are formulated by the FFGI Methodology as a result:

- **Protected areas and High Conservation Value Forests**

  Forestry activities in all protected areas that fall within the categories I-IV of the World Conservation Union, the UNESCO World Heritage Convention and the Ramsar Convention on Wetlands require special attention and protection. These areas are dealt with extensively in the chapter on Biodiversity (see section 2.1). Policies of financial institutions have to be aimed at avoiding investments in forestry activities in these areas.

  Many of these areas are also included in the analyses for investments by International Finance Corporation's (IFC) Performance Standard 6 concerning Biodiversity Conservation and Sustainable Management of Living Natural Resources. It determines how companies should operate in order to avoid negative consequences on areas of high biodiversity value, including impact on natural habitats as well as endangered and endemic species. The requirements in the standard have been guided by the Convention on Biological Diversity.

  In addition, the Forest Stewardship Council (FSC) has developed the High Conservation Value Forests (HCVFs) concept. HCVFs are forest areas with biological, ecological, social or cultural attributes that make them particularly valuable for biodiversity and/or local people.[599] The objective of assigning an HCVF-label to certain forest areas is to be able to better identify valuable forests, developing suitable protection so important ecological and social economic bl remain preserved.[600] The High Conservation Value Forest Toolkit, developed by IKEA and ProForest in 2003, provides starting points for applying the concept and implementation on a national scale. Organisations supporting the HCV Resource Network HCV Charter can register.

  Assessment elements regarding High Conservation Value areas are covered in the cross-cutting theme Biodiversity (see section 2.1).

- **High Carbon Stock areas**

  Different forests have different degrees of carbon storage. The High Carbon Stock (HCS) Approach is a methodology to identify areas of land suitable for plantation development and forest areas that can be protected in the long term. The methodology distinguishes natural forest areas from degraded lands (former forest) that now contain only small trees, shrubs, or grasses. HCS forests store carbon that would be released if they were converted into plantations, as well as having rich biodiversity values. The methodology was originally developed by Greenpeace, The Forest Trust (TFT) and Golden Agri-Resources (GAR), and is now governed and will be further refined by a multi-stakeholder body called the High Carbon Stock Approach Steering Group. The HCS Approach is now used by plantation companies that have made a commitment to exclude deforestation from their supply chains.

This leads to assessment element	
1	Companies prevent negative impacts on High Carbon Stock (HCS) areas within their business operations and the forests they manage.

- **Illegal logging and deforestation**

  In 2004 the EU adopted the Forest Law Enforcement, Governance and Trade (FLEGT) Action Plan, which aims to prevent illegal logging. The plan seeks to develop markets for legal products in Europe and establish bilateral Voluntary Partnership Agreements (VPAs) with producing countries to build their capacity and support reforms in the governance of their forest sectors, in order to reduce the production of illegally harvested timber. The VPAs also seek to establish and implement tracking and licensing systems (Legality Assurance Systems - LASs) to ensure that only legally produced products enter the European Union. The first VPA was secured with Indonesia. In the period 2021-2025, VPAs are developed with eight priority countries in Asia, Africa and Latin America.[601]

In 2008, the United States were the first to ban the import, sale and trade of illegal timber and other related products. According to a 2008 amendment to the Lacey Act, importers have to indicate the wood species and the country of origin of most wood species, with heavy fines on importing wood products from illegal sources, regardless of whether this is done intentionally or unintentionally.

Following EU regulation 995/2010, the EU Timber Regulation (EUTR) came into force in 2013: "Placing illegally harvested timber and products derived from such timber on the EU market for the first time, is prohibited. EU operators – those who place timber products on the EU market for the first time – are required to exercise 'due diligence'. Traders – those who buy or sell timber and timber products already on the market – are required to keep information about their suppliers and customers to make timber easily traceable".[602] Companies can develop their own Due Diligence System or make use of the services of monitoring organisations across the European Union.

In December 2022, the European Union adopted the Regulation on deforestation-free supply chains (EUDR) to curb EU-driven deforestation and forest degradation. It aims to guarantee that the agricultural and forestry products that EU citizens consume on the EU market do not contribute to deforestation and forest degradation within the EU and globally. All relevant companies will have to conduct strict due diligence if they want to import, sell, or export palm oil, cattle, soy, coffee, cocoa, timber and rubber as well as derived products (such as beef, furniture, or chocolate) in/from the European market.[603] In December 2024, the application date of the EUDR was postponed to 30 December 2025.[604]

This leads to assessment element	
2	Companies throughout the wood supply chain prevent the use of illegally cut and traded timber.

- **Pulp and paper production**

In 2014 the Environmental Paper Network (EPN), a group of over 120 non-profit organisations endorsed a new Global Paper Vision, to improve sustainability in the paper supply chain. The Global Paper Vision encompasses seven principles, addressing the entire paper life-cycle:[605]

- reduce global paper consumption and promote fair access to paper;
- maximise recycled fibre content;
- ensure social responsibility;
- source fibre responsibly;
- reduce greenhouse gas emissions;
- ensure clean production; and
- ensure transparency and integrity.

The Global Paper Vision emphasises the importance of responsible sourcing "from forest managers that have credible, independent, third-party certification for employing the most environmentally and socially responsible forest management and restoration practices".[606]

This leads to assessment element	
3	Pulp and paper factories restrict the use of chemicals and the pollution of soil, water and air by making use of the best available techniques.

- **Fair and equal use of forests**

  In Article 8(j), the Convention on Biological Diversity (CBD) considers the fair and equal use and the advantages of biological diversity and requires that traditional knowledge of indigenous and local communities can only be used with their permission. A working Group on Article 8(j) and related provisions adopted a programme to implement the commitments of Article 8(j) of the Convention to enhance the role and involvement of indigenous peoples and local communities in the achievement of the objectives of the Convention. Parties to the Convention adopted several voluntary guidelines. These include the Akwé: Kon Guidelines which require the conduct of cultural, environmental and social impact assessments regarding developments proposed to take place or which are likely to impact on sacred sites and on lands and waters traditionally occupied or used by indigenous and local communities. The Tkarihwaié:ri Code of Ethical Conduct is to ensure respect for the cultural and intellectual heritage of indigenous and local communities. Also included are the Mo'otz Kuxtal Voluntary Guidelines for the development of mechanisms, legislation or other initiatives to ensure the "[free] prior and informed consent" or "approval and involvement" of indigenous peoples and local communities for accessing their traditional knowledge, innovations and practices and report and prevent among others unlawful appropriation of traditional knowledge.

This leads to assessment element	
4	Companies respect the rights of local and indigenous communities on the fair and equal use of forests.

- **Land rights, conflicts and forced evictions**

  Human rights, particularly economic, social, and cultural (ESC) rights, play a central role in land-related issues. However, there is no explicit recognition of a 'human right to land' within international human rights instruments. Those who face threats to their land rely on other rights, such as the right to food, the right to water, the right to housing and the right to work. These rights are included in the International Covenant on Economic, Social and Cultural Rights (ICESCR).[607] Women's land rights and indigenous peoples' land rights are also recognised in:

  - ILO Convention concerning Indigenous and Tribal Peoples (No. 169), Articles 6, 7, 16 and 22; and
  - The Convention on the Elimination of all forms of Discrimination against Women (CEDAW), Article 14.

  Other standards and assessment elements on land rights and forced evictions are covered in the cross-cutting theme Human Rights (section 2.5).

- **Certification of forest management and the wood product chain**

  The Forest Stewardship Council (FSC) is an international multi-stakeholder organisation committed to developing certification standards for sustainably managed forests. The FSC was established in 1993 and includes forest owners, forest construction companies, labour unions, social and environmental organisations. The latest version of the FSC Principles and Criteria (P&C) for Forest Stewardship dates from 2018 and outlines ten principles with respect to environmental and social aspects of sustainable forest management. These principles include requirements on labour rights, FPIC and other rights of indigenous peoples, the preservation of ecosystem services and protection of HCV areas.[608] The P&C form the basis of all FSC standards for forest and plantation management. In addition, thousands of wood products carry the FSC Chain of Custody-certificate, which guarantees that the entire production chain complies with FSC conditions.

  A scientific study by Utrecht University, with support from WWF and the Wildlife Conservation Society, in April 2024 revealed a higher number of large mammals in forests certified by the Forest Stewardship Council in Gabon and the Republic of Congo, compared to non-FSC-certified forests. This finding underscores that FSC-certified forest concessions can play an important role in protecting wildlife.[609]

The Programme for the Endorsement of Forest Certification (PEFC) is an international alliance of national forest certification schemes and is traditionally more dominated by large forestry companies than FSC. PEFC has developed an international benchmark for forest management that national certification schemes need to apply in order to receive PEFC endorsement. The latest version of the Sustainable Forest Management Standard dates from 2018 and includes requirements on compliance with fundamental ILO conventions, rights of indigenous peoples, as well as maintenance and enhancement of forest ecosystems under management.[610] PEFC has also developed 2020 Chain of Custody Certification to guarantee that forest-based materials in a product originate from sustainably managed forests. PEFC certificates are mainly issued in Europe. Most PEFC-certified wood comes from North America, followed by Europe.[611]

A 2019 Profundo report on labour rights and human rights in forest certification standards found that human rights risks were addressed properly in both the FSC and PEFC standard. Both standards also address environmental and labour rights risks, although room for improvement remains. The Chain of Custody standards for both systems did not adhere fully to key international standards (such as the OECD Guidelines for Multinational Enterprises or ILO Fundamental Conventions), and significant differences remain between national standards, especially in the PEFC system.[612]

Over the years, PEFC has been subject to significant criticism from civil society organisations (CSOs). As PEFC certification takes place on the basis of national standards, it is difficult to derive clear criteria from a PEFC certificate. WWF's Forest Certification Assessment Tool (CAT) pointed out in 2015 that while the international PEFC-benchmark "performs well in areas such as water and soil management, it scores less on several important criteria, such as biodiversity, and workers' rights", and "the credibility of the PEFC system would benefit from more active and formally balanced participation from a wide range of stakeholders in its governance system, and greater transparency".[613]

In a recent 2021 Greenpeace report, PEFC is still considered as one of the weakest certification systems, despite "some gradual improvement". According to the report: "the PEFC's international standards […] remain weak and insufficient in crucial areas. For example, they still do not address IFLs, do not recognize and protect most other HCVs, do not sufficiently prohibit conversion of forests to plantations, do not consistently recognize and protect Indigenous Peoples' rights and do not address certified companies' controversial practices outside of certified forests."[614]

Criticisms on social or environmental grounds have also been delivered about the Malaysian Timber Certification Scheme (MTCS) and the Sustainable Forestry Initiative (SFI), both PEFC-endorsed national or regional certification systems.[615]

In conclusion, there is consensus among CSOs that PEFC standards do not ensure sustainable forestry, especially outside Europe. The Global Paper Vision, likewise, considers FSC the only international certification programme meeting their requirements of a good certification programme.[616] The Fair Finance International network therefore considers PEFC certification and other certification schemes not a sufficient requirement from companies. As these certification schemes do not meet the standards to ensure production of sustainable wood, FSC certification is the only acceptable certification system, although it has considerable weaknesses. FSC has also received criticism from civil society organisations for greenwashing forest destruction.[617]

This leads to assessment elements	
5	Production forests and timber plantations are certified according to the Forest Stewardship Council (FSC) forest management certification.
6	Supply chains of timber traders and companies in the wood product chain (including pulp, paper, veneer, furniture) are certified according to the FSC chain of custody certification.

- **Sustainability reporting**

  The Carbon Disclosure Project (CDP) Forest Program tries to help investors in identifying links between tropical deforestation and the activities and chains of the companies in which they invest. Questionnaires are sent on behalf of institutional investors. The results - which indicate whether a company has developed "best in class" in innovative risk control strategies, or did not respond to the request to make its forest footprint public - are collected in an annual report.[618]

  The Forests & Finance coalition's policy assessment methodology offers a similar framework based on international standards and practices which banks and investors can use to screen and engage with companies active in the forestry sector.

  The best known guidelines for sustainability reporting in general are the Global Reporting Initiative (GRI) Standards. The new GRI Universal Standard was released in 2021, which will be complemented by various *Sector* and *Topic Standards*.[619]

This leads to assessment elements	
7	Companies in industries with a large impact on forests (including in any case the forestry and paper industry), report their forest related information to the Carbon Disclosure Project (CDP) Forest Program.
8	Companies publish a sustainability report that is set up in accordance with recognised sustainability reporting frameworks

- **Procurement and supply chains**

  Companies are often part of long procurement and supply chains. They can monitor one another and question how they respect local and national legislation and international norms regarding social, economic, and environmental issues. The requirements that companies set for their suppliers can be included in contractual agreements.

  ISO 26000:2010 Guidance on social responsibility recognises the importance of supply chain responsibility, because "the impacts of an organisation's decisions or activities can be greatly affected by its relationships with other organisations".[620] A company's sphere of influence includes relationships within and beyond an organisation's supply chain. Moreover, ISO 26000:2010 Guidance on social responsibility recommends setting contractual provisions or incentives as a means of exercising influence.[621]

  In addition, ISO 20400:2017 Sustainable procurement – Guidance provides guidelines for organisations, independent of their activity or size, on integrating sustainability within procurement, as described in ISO 26000:2010 Guidance on social responsibility. It is intended for stakeholders involved in, or impacted by, procurement decisions and processes.

  The United Nations Guiding Principles on Business and Human Rights (UNGP) include a due diligence process in order to identify, prevent, mitigate and account for how companies address their adverse human rights impacts. The process "should cover adverse human rights impacts that the business enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships."[622]

This leads to assessment elements	
9	Companies integrate environmental, social and governance criteria in their procurement and operational policies.
10	Companies include clauses on the compliance with environmental, social and governance criteria in their contracts with subcontractors and suppliers.

4.4 Mining

4.4.1 Assessment elements

When financial institutions invest in or finance mining companies, they have to be aware of whether the company complies with the relevant international guidelines and agreements on the social and environment fields. This means that in the investment policy of financial institutions, clear norms need to be drafted.

The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:

1. Companies mitigate the chance of accidents by making use of the best available techniques and have a solid road map for crisis situations (a 'contingency plan').
2. Companies reduce extractive waste and manage and process this in a responsible way by adequately tracking, reviewing, and acting to improve their tailings risk management and by adopting a zero-failure objective to tailings storage facilities.
3. Riverine tailings disposal and sub-marine tailings disposal is unacceptable.
4. Companies ensure the recovery of ecosystems after commercial activities have been completed, for all extractive industry projects (i.e. this is included as an activity in the planning and the budget of the project).
5. Companies respect small scale and artisanal mining and improve sustainable economic and social development on a local level.
6. Companies only operate in weak governance zone or conflict-affected areas if they are able to demonstrate that they are not causing or contributing to human rights abuses.
7. Mining and trading in conflict minerals is unacceptable.
8. Uranium mining is unacceptable.
9. Asbestos mining is unacceptable.
10. Mountaintop removal mining is unacceptable.
11. Companies involved in the development of new thermal coal mines are excluded from investment and financing.
12. Companies involved in the development of new metallurgical coal mines and expansion of existing mines are excluded from investment and financing.
13. Deep sea mining is unacceptable
14. The financial institution excludes financing and investing in companies active in thermal coal mining for more than 20% of their activities.
15. Companies are certified according to the criteria of certification schemes for certain minerals (mentioned in section 4.4.3 of the FFGI Methodology)
16. Companies publish a sustainability report that is set up in accordance with recognised sustainability reporting frameworks.
17. Companies integrate environmental, social and governance criteria in their procurement and operational policies.
18. Companies include clauses on the compliance with environmental, social and governance criteria in their contracts with subcontractors and suppliers.

4.4.2 What is at stake?

Mining and ore refining are highly polluting activities that affect soil, air, and water quality. Many of extractive industry activities take place in open quarries, which contributes to the destruction of large areas of natural habitat of plants and animals. In addition, mining companies use huge amounts of water to separate the minerals in excavated mud or to dump acidic, toxic, and even radioactive waste. Rivers that supply people, animals and forests with water are severely polluted, as are the seas into which these rivers flow. In addition, pollution of waterways leads to erosion. A lot of mines are located in hilly or mountainous areas and when forest vegetation disappears - mainly after rainfall - the soil can start to slide, ending up in local waterways. Erosion can even lead to landslides and fatal floods.[623]

The consequences of the extractive industry have an effect long after industrial activities have been finished. Repair work is generally insufficient to restore nature in the extractive industry areas. Long-term problems - such as the leaking of acid from the mines - can pollute the waterways in the vicinity for decades or even centuries.[624] Furthermore, mining ore and also ore refining - even with the use of modern technologies - causes air pollution over a large area.[625]

The environmental, economic, social, and cultural rights of local communities are affected by mining. A common problem in the extractive industry is that mining companies do not respect the land rights of indigenous communities and other local inhabitants. The companies deprive these communities of large areas of land and forest on which they depend for their food and livelihood.[626] Traditional livelihoods can be destroyed through land acquisition (land grabs), land contamination and water pollution.[627] The pollution of the mines can lead to an accumulation of heavy metals in the soil, the water, and the air in the vicinity, causing serious health risks. This contamination also affects crops and animals that may be exposed.[628]

The mining sector is fraught with poor working conditions that endanger workers' health and safety. Miners often face hazardous environments with limited rights and minimal access to social protection, leaving them vulnerable to exploitation. The high prevalence of child labour is also a critical issue within the sector. This exposure places them at significant risk of injuries and diseases. The International Labour Organization (ILO) highlights that mining is among the most hazardous sectors for children, leading to numerous fatal injuries.[629]

Finally, the extractive industry disturbs the macro-economic development in many resource-rich developing countries. This is also referred to as the resource curse.[630] In developing countries with no stable political or legal system, the exploitation of metals and minerals from the soil often leads to corruption, irreducible revenues, bad management of the supplies and the unequal division of the revenues within the local communities. The costs related to protecting the environment and ensuring social cohesion will be borne by the population, or in other words, by those that have gained little or nothing from the exploitation. As a result, the extractive industry leaves a lot of countries even poorer than prior to the development of the industry. The African Development Bank has calculated that African countries miss out on USD 50-60 billion due to the resource curse. Moreover, the industry regularly exacerbates conflicts between local population groups, the mining companies, and the government.[631]

Some mining companies operate in developing countries yet the related subsidiaries are located in tax havens in order to pay as little tax as possible. After the US state Delaware, the Netherlands is the favourite tax haven for mining companies.[632] The ten largest oil companies and mining companies globally that own natural resources in developing countries have hundreds of subsidiaries in the Netherlands. However, under Dutch legislation, it is impossible to investigate the fiscal and financial data of these subsidiaries. Therefore, it has proven very difficult to determine how much revenue companies make from the activities in these countries and how much tax local governments lose.[633]

Some minerals extracted by the mining industry are sourced from conflict-affected areas and the mining supply chain is involved in the fuelling and financing of this conflict, leading to serious human rights abuses. Important areas to consider are the Democratic Republic of Congo (DRC), Afghanistan, Colombia, and Zimbabwe.[634]

Besides industrial mining by large mining companies, artisanal and small-scale mining (ASM) is a common practice in many developing countries. With rising mineral prices, ASM has seen explosive growth over the last decade and an estimated 45 million people were directly engaged in ASM.[635] People engaged in ASM often belong to the most vulnerable population groups. Since ASM often takes place in fragile ecosystems with large degrees of cultural and biological diversity, small-scale extractive industry activities can cause environmental problems, enhance material poverty, and harm human health.[636]

In these scenarios, economic, social, and cultural rights at stake are, for example, the right to food, work, housing, health, and a healthy environment. Moreover, the impact can be particularly severe for certain groups, such as indigenous peoples, because their way of life and their identity are often closely related to their land. Far too often, companies operating across borders are involved in severe abuses, such as child labour, forced labour or forced evictions. In addition, affected communities are frequently denied access to information about the impact of company operations. This means that they are excluded from participating in decisions that affect their lives. And, often when communities attempt to get justice, they are thwarted by ineffective legal systems, corruption, or powerful state-corporate alliances. Worryingly, when the poor cannot secure justice, companies learn that they can exploit poverty without consequences.[637]

In recent years, growing demand for metals and minerals has prompted increased industry interest in opening up the ocean floor for mining operations. Deep seabed mining involves the extraction of metals and minerals from the seabed at depths greater than 200 meters. Deep seabed mining is often touted by the emerging industry as potentially more environmentally and socially responsible than land-based mining, as it does not generate pollution on land and does not require the displacement of local communities. In addition, proponents often stress that deep seabed mining could be a potential source of essential materials for the energy transition. However, scientists, civil society organisations and international organisations have objected that deep seabed mining is likely to result in considerable and irreversible damage to complex, delicate and still poorly understood ocean ecosystems. Impacts may include the crushing of living organisms, the removal of substrate habitat and the creation of toxic sediment plumes. There is also the possibility of other environmental damage through malfunctions in the riser and transportation system, hydraulic leaks, and noise and light pollution. This may, in turn, have significant negative socio-economic consequences as ocean-dependent industries suffer from the disruption of ocean ecosystems and food chains. In a 2019 report WWF highlighted that "while deep seabed mining as an industry has been valued at USD 2 to 20 billion, it threatens to disrupt a much wider ocean economy, valued at USD 1.5 to 2.4 trillion annually." [638]

The extractive industry consists of companies that extract, transport, purify and store minerals. The products are then processed and used in several other industries on a large scale, such as the electronics industry, the military industry, the construction industry, and the automotive industry. These industries strongly depend on the extractive industry and hence are, to a certain extent, involved in the negative effects of the mines and refineries on the environment and local communities. The extractive industry will have to drastically change course in order to contribute to a more sustainable and socially just world. The policies of financial institutions must aim only at engaging in financial relations with mining companies that are willing to do so. When developing policies for this industry, financial institutions can use the international standards described in the following section.

4.4.3 International standards and initiatives

Various international initiatives are involved in the risks that extractive industry pose for human beings and the environment; globally there is increasing interest for applying standards to this industry. In addition, there are some international conventions and multi-stakeholder processes that set standards for specific extractive industry activities. The main international standards on the mining industry are summarised per topic, followed by the assessment elements that are formulated by the FFGI Methodology as a result:

- **Areas of high biodiversity and protected areas**

  Extractive industry activities should not take place in areas listed in the categories I to IV of the International Union for Conservation of Nature (IUCN), or included in the UNESCO World Heritage Convention or in the Ramsar Convention on Wetlands. Furthermore, extractive industry projects in areas that fall under the following conventions and initiatives are to be expressly avoided: forests identified with the High Carbon Stock Approach, Marine Protected Areas, High Conservation Value areas and IUCN protected areas.

  Many of these areas are also included in the analyses for investments by International Finance Corporation's (IFC) Performance Standard 6 concerning Biodiversity Conservation and Sustainable Management of Living Natural Resources. It determines how companies should operate in order to avoid negative consequences on areas of high biodiversity value, including impact on natural habitats as well as endangered and endemic species. The requirements in the standard have been guided by the Convention on Biological Diversity.

  The United Nations Environmental Assembly adopted a resolution on pollution mitigation by mainstreaming biodiversity into key sectors in 2017, aiming at "strengthening efforts to integrate conservation and sustainable use of biodiversity in various sectors such as agriculture, fisheries and aquaculture, tourism, mining and energy, infrastructure and manufacturing among others. It also points to the need to prevent and reduce pollution from these sectors".[639]

  Assessment elements about biodiversity are covered in the cross-cutting theme Biodiversity (section 2.1).

- **Crisis response and crisis prevention**

  The International Council on Mining and Metals (ICMM) Principle 4 requires companies to "develop, maintain and test effective emergency response procedures in collaboration with potentially affected parties." International Finance Corporation's (IFC) Performance Standard 1 also requires companies to have a solid roadmap for crisis situations and develop a contingency plan.

This leads to assessment element	
1	Companies mitigate the chance of accidents by making use of the best available techniques and have a solid road map for crisis situations (a 'contingency plan').

- **Waste management**

  Many environmental problems in the extractive industry concern the way extractive waste is dealt with. In this respect, the management of tailings storage systems is especially relevant. According to the Responsible Mining Foundation, the increasing number of failures in tailings storage facilities in recent years highlights that mining companies still insufficiently monitor and address the risks associated with tailings dams.[640] The existing standards and guidelines with regard to waste management are:

  - The Convention on the Prevention of Marine Pollution by Dumping of Wastes and other Matter (1972), of the United Nations International Maritime Organisation (IMO). The convention prohibits the direct dumping of mercury and mercury compounds into the sea and makes special permits a requirement to dump cyanide and other heavy metals.

- The World Bank Extractives Industries Review (EIR) advises companies to avoid waste dumping in the sea and in rivers and to look for safer alternatives to the use of cyanide and mercury. The most recent update for this advice is from 2016.
- The 2006 EU Commission Directive on the Management of waste from the extractive industries requests European Union member states to ensure that extractive waste is managed without endangering human health or the environment, especially water, air, soil, flora and fauna. The member states also need to take the necessary precautions to prohibit the uncontrolled abandonment, dumping and disposal of extractive waste.
- The Global Tailings Review is an initiative by the ICMM, UNEP and PRI, convened to develop an international standard to prevent catastrophic damage from failures at tailings storage facilities. The standard is to become an ICMM company member commitment. The Global Industry Standard on Tailings Management was published in August 2020.
- The Investor Mining and Tailings Initiative (IMTSI) was founded in 2019 after the disaster at Brumadinho, Brazil, where a tailings storage facility failed, killing 270 people, and causing environmental damage. The initiative is led by the Church of England Pensions Board and the Swedish Council on Ethics. It is a coalition of over than 100 investors with more than USD 20 trillion worth of Assets under Management (AuM). The CEPB and Swedish COE partnered with GRID Arendal to develop the Global Tailings Portal, which was launched in January 2020. It is a free, searchable database with detailed information on more than 1,800 mine tailings dams around the world.

This leads to assessment elements	
2	Companies reduce extractive waste and manage and process this in a responsible way by adequately tracking, reviewing and acting to improve their tailings risk management and by adopting a zero-failure objective to tailings storage facilities.
3	Riverine tailings disposal and sub-marine tailings disposal is unacceptable.

- **Water use**

  Given the growing challenge of water scarcity, it is vital that mining companies and financial institutions become aware of their own influences on water related problems. Various initiatives, guidelines and standards have emerged in recent years, to help companies address water risk.

  Standards and assessment elements about water use are covered in the cross-cutting theme Biodiversity (section 2.1).

- **Closing depleted mines**

  The condition in which exhausted mines are left behind has large consequences for the populations and ecosystems in the vicinity. Negative environmental and health effects can have an impact for years - perhaps even centuries. The Mining, Minerals and Sustainable Development (MMSD) project asks companies to take the environment and health effects after closing mines into consideration in the plans for the development of the mine and in the assessment of the effects on local communities. This means the future destination of the mine, the provisions to be made and the responsibilities of the mining company need to be taken into account.

This leads to assessment elements	
4	Companies ensure the recovery of ecosystems after commercial activities have been completed, for all extractive industry projects (i.e. this is included as an activity in the planning and the budget of the project).

- **Small scale and artisanal extractive industry**

Small-scale and artisanal extractive industry projects - provided they are well managed - can enhance sustainable economic and social development on a local level. The Alliance for Responsible Mining (ARM) is an independent multi-stakeholder initiative that aims to enhance social justice and wellbeing in the small scale extractive industry by improving social, environmental and working conditions, solid management of the mines and conducting repair work for the ecosystem. In November 2013 the ARM started cooperation with the Swiss Institute for Market Ecology in order to develop an independent certification and auditing system for the Fairmined Standard. In 2014 the Fairmined Standard for Gold and Associated Precious Metals was launched.

While investment in mining activities may not include direct investment in artisanal or small-scale mining, investment in industrial mining operations does still have consequences for small-scale and artisanal mining. As International Council on Mining and Metals (ICMM) Principle 9 states, companies should contribute to the social, economic and institutional development of the communities in which they operate. This includes the communities of artisanal and small-scale miners, which often live and work around or near large-scale mines. Large-scale mining operations already engage with artisanal miners and their dependents through community development programs, but certain issues, such as security and human rights, still require attention. In 2010 the ICMM published the report Working together: How large-scale mining can engage with artisanal and small-scale miners, discussing a sound engagement approach with small-scale miners, as key stakeholders for large-scale mining companies.

This leads to assessment element	
5	Companies respect small scale and artisanal mining and improve sustainable economic and social development on a local level.

- **Labour rights**

  Besides respecting human rights, it is of great importance that mining companies adhere to the United Nations International Labour Organisation's (ILO) main codes of conduct. These are the 1998 ILO Declaration on Fundamental Principles and Rights at Work and the Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy (MNE Declaration). In addition, specifically for the extractive industry, the Convention concerning Safety and Health in Mines (No. 176) should be taken into account. The rights of women in the extractive industry are recognised in the 2013 Iroco Declaration.

  More international standards and assessment elements on labour rights are covered in the cross-cutting theme Labour rights (section 2.6).

- **Land rights conflicts and forced evictions**

  Human rights, particularly economic, social, and cultural (ESC) rights, play a central role in land-related issues. However, there is no explicit recognition of a 'human right to land' within international human rights instruments. Those who face threats to their land rely on other rights, such as the right to food, the right to water, the right to housing and the right to work. These rights are included in the International Covenant on Economic, Social and Cultural Rights (ICESCR).[641] Women's land rights and indigenous peoples' land rights are also recognised in:

  - ILO Convention concerning Indigenous and Tribal Peoples (No. 169), Articles 6, 7, 16 and 22; and
  - The Convention on the Elimination of all forms of Discrimination against Women (CEDAW), Article 14

  In 2013 the International Council on Mining and Metals (ICMM) issued guidelines for its member companies. The Indigenous Peoples and Mining Position Statement deals with the obligations of extractive companies with regard to the indigenous peoples and emphasizes that companies are expected to commit to work to obtain the free, prior and informed consent (FPIC) of indigenous peoples for new projects located on lands traditionally owned by or under customary use of indigenous peoples.

Other international standards and assessment elements on land rights and forced evictions are covered in the cross-cutting theme Human rights (section 2.5).

- **Transparency of financial flows**

  In the Extractive Industries Transparency Initiative (EITI) a coalition of governments, companies, social organisations, and investors have drafted criteria for governments of countries where extractive industry activities take place. The governments are expected to fully publish all revenues they receive from these activities.

  The Publish What You Pay (PWYP) coalition, in which more than 300 CSOs collaborate, advocates that mining companies publicly disclose their payments to governments. This means that companies must report on their tax payments, royalties, and concession payments in the countries where they operate. In addition, PWYP insists that important contracts and agreements between governments and mining companies and all bank loans related to the exploitation of raw materials should be made public.

  In the United States, the Dodd-Frank Act (Dodd-Frank Wall Street Reform and Consumer Protection Act) came into force in 2010 (see also section on conflict minerals). Section 1504 concerns reporting requirements for payments to government institutions in relation to the mining of oil, gas, and minerals.[642]

  The EU Commission adopted Directive 2013/34/EU in 2013, which obliges big European companies—both listed and non-listed companies—active in the extractive industries and in the logging of primary forests to publicly report on their payments to governments, broken down by country.

  Assessment elements about tax are covered in the cross-cutting theme Tax (section 2.7).

- **Good governance**

  In order to minimise the negative consequences of the *resource curse*, it is important that the development of the extractive industry is combined with the development of capable and reliable governance. The World Bank Extractive Industries Review (EIR) advises against stimulating private investments in the extractive industry in countries where governance is ineffective. It also states that the quality of governance has to meet explicit conditions before an extractive industry project can be financed by the World Bank.

  The United Nations Guiding Principles on Business and Human Rights (UNGP) highlight the heightened risks of involvement in gross human rights abuses in conflict-affected areas. To prevent this, a company should manage its own impact.

  The OECD Risk Awareness Tool for Multinational Enterprises in Weak Governance Zones could be helpful in detecting areas where strong governance is needed to avoid human rights abuses or to refrain from doing business.

  The Natural Resource Charter of the Natural Resource Governance Institute is a set of "principles to guide governments' and societies' use of natural resources so these economic opportunities result in maximum and sustained returns for a country's citizens. It outlines tools and policy options designed to avoid the mismanagement of diminishing natural riches, and ensure their ongoing benefits".[643] Although the Charter is primarily aimed at governments and societies, the document also describes the responsibilities of state-owned extractive companies and private companies.

This leads to assessment element

6	Companies only operate in weak governance zone or conflict-affected areas if they are able to demonstrate that they are not causing or contributing to human rights abuses.

- **Conflict minerals and diamonds**

  The problem of proceeds from mineral mining fuelling conflict and civil war has been well-documented for many years, particularly in the Democratic Republic of Congo (DRC) but also in parts of Afghanistan, Colombia, Zimbabwe and elsewhere. Minerals which risk fuelling conflict include gold, coltan (or tantalum), tin (or cassiterite) wolframite (or tungsten) and diamonds and other minerals sourced from conflict zones. These resources can enter global supply chains and end up in mobile phones, laptops, jewellery, and other products.

  Significant legislation includes Section 1502 of the 2010 Dodd Frank Act in the United States, which requires US-listed companies to carry out due diligence on tantalum, tin, gold or tungsten sourced from DRC and neighbouring countries. It also concerns reporting requirements on the use of conflict raw materials from the Democratic Republic of Congo (DRC) and neighbouring countries. Companies that are listed on the New York Stock Exchange and use minerals from this region have to provide insight into the financial flows and research whether they contribute to the financing of armed groups.[644]

  EU Regulation 2017/821 was passed in 2017 and is intended to stop:[645]

  - "conflict minerals and metals from being exported to the EU;
  - global and EU smelters and refiners from using conflict minerals; and
  - mine workers from being abused."

  To support the development of local communities, the regulation also requires EU companies to ensure they import these minerals and metals only from responsible sources.[646] The EU regulation applies to tin, tantalum, tungsten, and gold and has entered into force on 1 January 2021. To comply with the law, importers in the EU are required to report annually on supply chain due diligence.

This leads to assessment element	
7	Mining and trading in conflict minerals is unacceptable.

- **Unacceptable mining practices**

  As almost all mined **uranium** is used for electricity production in nuclear power stations (discussed in section 4.6), this can be considered a strategic service to the nuclear power sector. Mining uranium poses significant threats to species, ecosystems, and human communities—from habitat destruction and disruption of wildlife to pollution of waters. Pollutants can contaminate aquatic ecosystems for centuries, threatening downstream communities and marine species. Even small amounts of some contaminants can poison fish, accumulate in the food chain, and cause deformities and reproductive problems for aquatic species.[647]

  Asbestos is a group of fibrous materials that have historically been used in a variety of settings, including as insulation in buildings, in roofing shingles, and in fire blankets. Asbestos is widely known to be highly carcinogenic, causing cancer of the lung, larynx and cervix, as well as a host of other diseases, and is responsible for more than 70% of all deaths from work-related cancers.[648] As of January 2025, 72 countries have put in place either full or partial bans on the production and use of asbestos.[649] The WHO emphasizes that "the most efficient way to eliminate asbestos-related diseases is to stop the use of all types of asbestos" and works together with the ILO and civil society organisations towards this goal. Given the carcinogenic nature of all types of asbestos at all levels of exposure, the mining of asbestos can be considered an unacceptable practice.

Deep seabed mining (DSB) is a mining practice with potentially devastating effects on ocean ecosystems and livelihoods dependent on a healthy ocean.[650] Since the exact negative environmental and social risks of DSB are not yet properly understood, the 2021 IUCN World Conservation Congress adopted a resolution calling for a moratorium on seabed mining until, amongst others, "the environmental, social, cultural and economic risks of deep seabed mining are comprehensively understood" and "the precautionary principle, ecosystem approach, and the polluter pays principle have been implemented".

The goal of the 2015 Paris Agreement is to "strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius".[651] The UN Environment Programme Emissions Gap Report 2022 emphasizes that the world is falling short of the Paris climate goals, and must cut emissions by 45 per cent to avoid global catastrophe[652] A rapid transition of the global energy sector is considered key to meeting these targets and requires at least:[653]

- "Expanding Renewable Energy for electrification;
- Phasing out coal for rapid decarbonization of the energy system;
- Decarbonizing transport with a focus on electric mobility;
- Decarbonizing energy-intensive industry; and
- Avoiding future emissions while improving energy access."

Already in 2017, the UNEP stressed that "between 80 and 90% of **coal** reserves worldwide will need to remain in the ground if climate targets are to be reached. This compares with approximately 35% for oil reserves and 50% for gas reserves".[654] In addition, the UNEP Production Gap Report 2021 estimates that the world's governments plan to produce more than twice the amount of fossil fuels in 2030 than would be consistent with limiting warming to 1.5°C.

In May 2021, the International Energy Agency (IEA) released a new report, "Net-zero by 2050: A roadmap for the global energy sector," which describes a pathway towards net-zero CO2 emissions in the energy sector by 2050. Among the essential measures described to reach net zero emissions by 2050, the IEA calls for an immediate end to new investment in fossil-fuel extraction and net-zero electricity by 2040.[655] The IEA also calls for all unabated coal plants and oil power plants in advanced economies to be phased out by 2030 and in all economies by 2040.

Metallurgical coal accounts for about 14 percent of global coal production but is rarely included in financial institutions' coal phase-out policies. Reclaim Finance reports that out of 100 financial institutions assessed in its report, only five included metallurgical coal in their policies.[656]

Besides the need to move away from fossil fuel extraction in general, there are certain mining extraction techniques that are considered both by private actors and civil society organisations to be particularly damaging in terms of their impacts on the environment and local populations. For example, mountaintop removal mining (MTR) is considered an unacceptable practice by several financial institutions. MTR mining is associated with extreme environmental and health risks, that cannot be fully mitigated.[657] For this reason it is often listed on financial institutions' exclusion lists.[658]

The Global Coal Exit List published by Urgewald, is updated annually and "provides key statistics on over 1600 companies whose activities range from coal exploration and mining, coal trading and transport, to coal power generation and the manufacturing of coal plants",[659] because "investments in new coal power capacity are incompatible with the Paris climate goals as each new coal plant locks-in high CO_2 emissions for decades to come".[660]

Taking into account the huge impact of coal mining on the environment and local communities, especially extreme mining, and its contribution to climate change once the coal is burned, these activities are considered unacceptable by the Fair Finance International network.[661]

This leads to assessment elements	
8	Uranium mining is unacceptable.
9	Asbestos mining is unacceptable.
10	Mountaintop removal mining is unacceptable.
11	Companies involved in the development of new thermal coal mines are excluded from investment and financing.
12	Companies involved in the development of new metallurgical coal mines expansion of existing mines are excluded from investment and financing.
13	Deep seabed mining is unacceptable.
14	The financial institution excludes financing and investing in companies active in thermal coal mining for more than 20% of their activities.

- **Standards for a sustainable extractive industry**

The Initiative for Responsible Mining Assurance (IRMA) Standard for Responsible Mining, outlines requirements based on business integrity and social and environmental criteria. IRMA offers independent assessment against a comprehensive standard for all mined materials that provides 'one-stop coverage' of the full range of issues related to the impacts of industrial-scale mines. The standard was developed over ten years and in consultation with more than 100 companies and organizations. It covers all mined materials, except for energy fuels, for all sizes of industrial mines and in all parts of the world. IRMA is governed by labour unions, mining-affected communities, environmental and social justice organizations, as well as mining companies and those businesses that buy and invest in mined materials.

The Framework for Responsible Mining, drafted by the WWF, provides a clear analysis of environmental, social and governance problems that should be included in a sector policy for the extractive industry.

The Sustainable Development Framework: ICMM Principles of the International Council on Minerals & Metals (ICMM) is based on the Mining, Minerals and Sustainable Development (MMSD) project. The Framework comprises 10 principles for sustainable development in the extractive industry. It obliges ICMM participants to report according to GRI Standards and it requires external verification of this reporting. Also, a grievance mechanism has been set up for dealing with grievances of ICMM participants.[662]

In 2017, ICMM released a best practice guidance on water management: "member companies have come to understand that even the most water-efficient operations that stringently manage water discharges can still be subject to significant water risks manifesting outside the operational fence line at the catchment level". The guidance calls for wide stakeholder engagement and expects companies to consider risks outside its own operations. In August 2021, the ICMM published the second edition of the Practical guide to consistent water reporting. The guidance accompanies ICMM's 2014 Water stewardship framework.

The OECD has written recommendations on respecting human rights and avoiding involvement in conflicts in extractive industry areas in its OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. In 2016 the OECD launched a project to "develop and pilot test an assessment methodology for evaluating the extent to which industry programmes align with the detailed recommendations of this OECD Guidance".[663] The 2018 Alignment Assessment Report presents the findings of the pilot project.

Although the OECD Due Diligence Guidance for Responsible Mineral Supply Chains identifies the worst forms of child labour as a serious human rights abuse, there is little detail available on how companies can conduct due diligence on child labour-related risks. Therefore, the Practical actions for companies to identify and address the worst forms of child labour in mineral supply chains, released in 2017, help companies to identify, mitigate and account for the risks of child labour in their mineral supply chains.

In 2017, OECD released the OECD Due Diligence Guidance for Meaningful Stakeholder Engagement in the Extractive Sector. It intends to provide guidance to companies in the mining and oil and gas sectors in addressing the challenges related to stakeholder engagement and is part of a series of sectoral guidance for the application of the recommendation found in the OECD Guidelines for Multinational Enterprises.

For some minerals there are specific standards, or they are being developed, including:

- The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas also contains specific guidelines for tin, tantalum, and tungsten.
- The Minamata Convention on Mercury is a global treaty to protect human health and the environment from the adverse effects of mercury, and entered into force in August 2017. The treaty includes a ban on new mercury mines, a phase-out of existing mines, and the phase-out and phase down of mercury use in certain products, as well as regulations for mercury emissions and the use of mercury in artisanal and small-scale gold mining.
- The involvement of the diamond industry in armed conflicts has led to the Kimberley Process Certification Scheme. The system forces governments to certify diamonds that are not being used for financing conflict groups. The certification process has proven to be a useful first step to make conflict diamonds recognisable, but it still lacks an independent supervisor.
- The Council for Responsible Jewellery Practices (CRJP) is also working on a certification scheme similar to the Kimberley Process. The council consists of more than 450 companies operating in the product chains of gold, diamonds, jewellery, and watches. In 2019, the CRJP published their revised Principles and Code of Practice, together with certification manuals and assessment guidelines. The next revision is due in 2024. All participating companies are expected to produce a human rights report and they must (in relevant cases) take into account the Free and Prior Informed Consent and the extraction of raw materials in conflict areas.
- The International Conference on the Great Lakes Region (ICGLR) Regional Certification Mechanism has set standards for traceability and certification of minerals in the conflict-prone Great Lakes area
- The gold industry has developed various initiatives:
    - The International Management Code for the use of Cyanide, a voluntary agreement on reducing the use of cyanide, on improving safety in transport and on taking measures that guarantee the miners health and safety. The code also contains plans for crisis management, but lacks guidelines for waste processing;
    - The World Gold Council has developed the Conflict-Free Gold standard. Voluntary participation involves submitting to an audit, of which the results are made public, to assess whether gold has been responsibly extracted;
    - Fairtrade Gold and Precious Metals is a certification scheme for responsibly sourced gold and precious metals from artisanal and small-scale sources that comply with social, environmental, labour and traceability requirements;
    - Another initiative is Fairmined Gold, a third party assurance scheme developed by the ARM;

- The London Bullion Market Association (LBMA) Responsible Gold Guidance is mandatory for all LBMA accredited refiners and ensures that all gold feed stock and all gold produced by refiners is conflict-free. The guidance was last updated in November 2021; and
- The Responsible Mining Foundation (RMF) has created the Responsible Mining Index, an assessment of mining companies' policies and practices on key economic, environmental, social, and governance (EESG) indicators. By assessing and comparing mining companies' efforts and policies, it seeks to promote the adoption of best practices and a 'race to the top'.[664]

Many of these initiatives are still under development and haven't yet developed specific certification schemes that financial institutions can take over literally in their investment policy. Financial institutions have been advised to closely follow the developments of these initiatives and/or actively participate in them.

This leads to assessment element	
15	Companies are certified according to the criteria of certification schemes for certain minerals (mentioned in section 4.4.3 of the FFGI Methodology).

- **Sustainability reporting**

The best known guidelines for sustainability reporting in general are the Global Reporting Initiative (GRI) Standards. The new GRI Universal Standard was released in 2021, which is complemented by various *Sector* and *Topic Standards*.[665] In March 2022, the Sector Standard for Coal has been released. The development of the Mining Sector Standard is currently underway.

This leads to assessment element	
16	Companies publish a sustainability report that is set up in accordance with recognised sustainability reporting frameworks.

- **Procurement and supply chains**

Companies are often part of long procurement and supply chains. They can monitor one another and question how they respect local and national legislation and international norms regarding social, economic, and environmental issues. The requirements that companies set for their suppliers can be included in contractual agreements.

The importance of this is also recognised in the OECD Guidelines for Multinational Enterprises. The OECD Due Diligence Guidance for Responsible Business Conduct provides practical support to companies on the implementation of the OECD Guidelines for Multinational Enterprises by providing plain language explanations of its due diligence recommendations. Implementing these recommendations can help companies avoid and address adverse impacts that may be associated with their operations, supply chains and other business relationships.

ISO 26000:2010 Guidance on social responsibility recognises the importance of supply chain responsibility, because "the impacts of an organisation's decisions or activities can be greatly affected by its relationships with other organisations".[666] A company's sphere of influence includes relationships within and beyond an organisation's supply chain. Moreover, ISO 26000:2010 Guidance on social responsibility recommends setting contractual provisions or incentives as a means of exercising influence.[667]

In addition, ISO 20400:2017 Sustainable procurement – Guidance provides guidelines for organisations, independent of their activity or size, on integrating sustainability within procurement, as described in ISO 26000:2010 Guidance on social responsibility. It is intended for stakeholders involved in, or impacted by, procurement decisions and processes.

The UNGPs include a due diligence process in order to identify, prevent, mitigate and account for how companies address their adverse human rights impacts. The process "should cover adverse human rights impacts that the business enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships."[668]

This leads to assessment elements	
17	Companies integrate environmental, social and governance criteria in their procurement and operational policies.
18	Companies include clauses on the compliance with environmental, social and governance criteria in their contracts with subcontractors and suppliers.

4.5 Oil and gas

4.5.1 Assessment elements

The investment policy of financial institutions on the oil and gas sector has to emphasise that the main challenge for the oil and gas sector is the further development of sustainable energy, winding down the production of oil and gas and becoming compatible with a 1.5 degrees scenario. In addition, the policies of financial institutions have to include social and environmental norms for the oil and gas sector.

The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:

1. Companies mitigate the chance of accidents (oil spills, leakages) by making use of the best available techniques and have a solid road map for crisis situations (a so called 'contingency plan').
2. Companies reduce waste from oil and gas extraction and mining, especially the flaring of natural gas, and manage and process this in a responsible way.
3. Companies reduce the effects of seismological research on whales and other marine mammals.
4. Companies only operate in weak governance zone or conflict-affected areas if they are able to demonstrate that they are not causing or contributing to human rights abuses.
5. Companies active in the extraction of oil from tar sands are excluded from investment and financing.
6. Extracting oil from oil shale is unacceptable.
7. Extracting shale gas in unacceptable.
8. Arctic drilling for oil and gas is unacceptable.
9. Companies engaged in new oil and gas exploration and development are excluded from investment and financing.
10. Construction of new oil and gas pipelines is unacceptable.
11. Companies phase out their oil and gas operations in line with a 1.5-degrees scenario.
12. Companies publish a sustainability report that is set up in accordance with recognised sustainability reporting frameworks.
13. Companies integrate environmental, social and governance criteria in their procurement and operational policies.
14. Companies include clauses on the compliance with environmental, social and governance criteria in their contracts with subcontractors and suppliers.

Financial institutions that publicly state they fully exclude the oil and gas industry (both upstream and downstream companies) from their finance and investment universe will receive a full score for all elements in this sector theme. If this commitment is made for one or more but not all four FFGI Methodology investment categories, a basic score and scope score for the relevant categories will be given for all assessment elements (see Table 2). If a financial institution excludes the oil and gas industry, but applies exceptions such as a revenue threshold, basic scores for all elements in the sector theme will be granted.

4.5.2 What is at stake?

Several processes within the oil and gas industry may harm the environment. Drilling platforms, oil, and gas production facilities, flaring plants, and refineries pollute the land, air, and water. The urge to fill reserves leads to oil companies penetrating deeper and deeper into ecologically vulnerable regions, from the Amazon to the Polar Regions. Cracks in pipelines caused by earthquakes, other natural causes and sabotage can lead to soil and water pollution and even to fatal explosions and fires. Moreover, oil spilled from tankers that were involved in accidents has polluted many marine areas and coastlines.[669]

The social consequences of the oil and gas industry can be extremely detrimental, affecting the economic, social, and cultural rights of local communities. Pollution and contagious diseases cause harm to the health, food safety and culture of indigenous (sometimes isolated) population groups. Often, oil and gas companies take the land of local communities and expropriate them from their source of food or revenues. Due to pollution, nearby residents can lose their source of income and food supply to the activities of oil and gas companies. Moreover, the production and transport of oil and gas have regularly contributed to the emergence of armed conflicts, the coming to power of, and remaining in power of, oppressive regimes and the violation of human rights. Especially in situations where companies cooperated with the army or local militias for the security of their operations, great humanitarian harm has occurred.[670]

The oil and gas industry often disturbs the macro-economic development of countries. The term *resource curse* is used for the development of corruption, irreducible revenues, bad management of oil supplies and an unequal division of the revenue to the population, in countries that are rich in natural raw materials.[671] This issue is exacerbated in countries with political instability and weaker rule of law. In these countries conflicts regularly arise between the local population, the oil companies, and the government.[672]

According to the United Nations, “at least 40 per cent of all internal armed conflicts over the past 65 years have had an important natural resource dimension. Since 1989, more than 35 major armed conflicts have been financed by revenues from conflict resources, and there are fears that in the coming years, extreme climate stresses could double the risk of violent conflict”.[673]

Some oil and gas companies operate in developing countries but the related subsidiaries are located in tax havens to pay as little tax as possible. After the US state Delaware, the Netherlands is the favourite hosting country for oil companies.[674] The ten largest oil companies and mining companies globally that own natural resources in developing countries have 365 subsidiaries in the Netherlands. However, under Dutch legislation it is impossible to investigate the fiscal and financial data of these subsidiaries. Therefore, it is very difficult to determine how much revenue companies make from the activities in these countries and how much tax the governments lose.[675]

Some unconventional production technologies and extraction sites are more controversial than conventional oil and gas extraction. Among these are:

- **Arctic oil and gas**: Off- and onshore drilling for oil and gas in the Arctic region is likely to severely damage the unique and vulnerable ecosystems of the region;
- **Hydraulic fracturing**: the use of hydraulic fracturing technologies (fracking) to extract oil and gas from shale is associated with considerable environmental risks, such as water and landscape pollution and the leaking of the greenhouse gas methane;
- **Tar sands**: The extraction of oil from oil sands or bituminous sands is a process associated with much higher greenhouse gas emissions than the production of conventional crude oil.

Several countries, including France, Germany, Scotland, Ireland, and Wales, as well as several states and cities in Canada and the United States, have also chosen to ban shale gas fracking.[676]

The oil and gas industry plays an important role in climate change. Climate change is largely caused by the combustion of fossil fuels, many of which are supplied by companies in the oil and gas industry. According to the International Energy Agency and the annual UNEP Production Gap reports, further exploration and development of oil and gas fields is inconsistent with keeping the global temperature increase below 1.5 degrees, and significant amounts of known oil and gas reserves will need to remain in the ground in order to reach the targets agreed in the Paris Agreement.[677] This means, firstly, that oil and gas companies should refrain from further exploring and developing oil and gas reserves. Secondly, in a world where sustainable energy sources are becoming more important, there will be less and less room for the oil and gas industry altogether. Therefore, the largest challenge for this industry is to phase down its oil and gas operations in line with a climate scenario aligned with the goals of the Paris Agreement.

The investment policy of financial institutions has to ensure that financial institutions are only involved in investments in companies in the oil and gas industry that meet these objectives. When developing policies for this industry, financial institutions can make use of the international standards described below.

4.5.3 International standards and initiatives

The main international standards on the oil and gas industry are summarised per topic, followed by the assessment elements that are formulated by the FFGI Methodology as a result:

- **Areas of high biodiversity and protected areas**

  Oil and gas activities are not permitted in areas that are listed in the categories I to IV of the International Union for Conservation of Nature (IUCN), or listed in the UNESCO World Heritage Convention or in the Ramsar Convention on Wetlands.

  These areas are also included in the analyses for investments by the International Finance Corporation's (IFC) Performance Standard 6 concerning Biodiversity Conservation and Sustainable Management of Living Natural Resources. It determines how companies should operate in order to avoid negative consequences on areas of high biodiversity value, including impact on natural habitats as well as endangered and endemic species. The requirements in the standard have been guided by the Convention on Biological Diversity.

  Furthermore, forests identified according to the High Carbon Stock Approach, Marine Protected Areas and High Conservation Value areas should be recognised and protected.

  The United Nations Environmental Assembly adopted a resolution on pollution mitigation by mainstreaming biodiversity into key sectors in 2017, aiming at "strengthening efforts to integrate conservation and sustainable use of biodiversity in various sectors such as agriculture, fisheries and aquaculture, tourism, mining and energy, infrastructure and manufacturing among others. It also points to the need to prevent and reduce pollution from these sectors".[678]

  Assessment elements about biodiversity are covered in the cross-cutting theme Biodiversity (section 2.1).

- **Crisis management**

  After the disastrous Exxon Valdez oil spill in 1989, where more than 40 million litres of oil covered the coastal areas of Alaska, the United Nations International Maritime Organisation (IMO) adapted the requirements for oil transport. The 2003 amendment to the MARPOL Convention demands that new oil tankers need to have a double hull and all large tankers with a single hull have been taken out of circulation between 2005 and 2010.

  The Protocol on Preparedness, Response and Co-operation in pollution Incidents by Hazardous and Noxious Substances (OPRC-HNS Protocol, 2000), drafted by IMO, aims to establish a global framework for international cooperation in order to prevent large scale incidents and the threat of maritime pollution. Parties that have ratified the HNS Protocol are expected to establish measures for polluting incidents or cooperate on a national level with other countries.

Ships are obliged to have an emergency plan on board for specific incidents with Hazardous and Noxious Substances.

Globally, the development of norms and regulations concerning the management of oil pipelines follows the standards originating from the United States. US regulation on Integrity Management (IM) is used all over the world as a 'best practice'. In Alaska there is the additional requirement that the 'Best Available Technology' (BAT) has to be applied to all oil and gas activities. An important part of such standards is that a company also has to be able to adequately respond to incidents. Globally recognised standards are:[679]

- API 1160 (American Petroleum Institute) for the implementation of Integrity Management (IM) programmes for High Consequence Areas;
- ASME B31.4 (American Society of Mechanical Engineers) standard for the design and construction of oil pipelines; and
- API RP 1130 standard to detect leakages *(Leak Detection Systems*).

The 'Marine Spill Working Group' of the International Petroleum Industry Environmental Conservation Association (IPIECA) has written guidelines for crisis planning and response in case of oil disasters at sea (Oil Spill Contingency Planning and Response). These guidelines are meant for the industry and for government organisations and is based on Industry Best Practices and on the expertise of IPIECA members the International Maritime Organisation (IMO) and the International Tanker Owners Pollution Federation (ITOPF).

In the European Union, directive 2013/30/EU on safety of offshore oil and gas operations was introduced in 2013 to improve safety on oil rigs. The directive should prevent pollution of water and coastal areas by means of strong demands regarding safety. Moreover, companies are expected to use adequate response mechanisms in order to reduce the consequences of accidents.

This leads to assessment elements	
1	Companies mitigate the chance of accidents (oil spills, leakages) by making use of the best available techniques and have a solid road map for crisis situations (a so called 'contingency plan').

- **Waste management**

The Convention for the protection of the Marine Environment of the North-East Atlantic (OSPAR) regulates the disposal and processing of waste from offshore oil and gas extraction and mining and serves as a basis for national legislation in the countries that have signed the OSPAR. Norway has drafted a more stringent national standard for waste processing from offshore-oil production, the so-called Zero environmentally hazardous discharges standard. This standard requires that a large part of the drilled mud is purified so it can be injected back into the oil field.

A special type of waste is natural gas that in some cases surfaces when oil is extracted. This gas is often vented, or it is burnt (flaring). Both venting and flaring result in huge losses of energy and emit large amounts of GHGs. The Global Gas Flaring Reduction Public-Private Partnership (GGFR), established by the World Bank, has drafted guidelines to reduce the flaring and venting of natural gas. In cooperation with GGFR and GHG Emissions Task Force, IPIECA developed a guideline in 2011 for governments and companies that wish to try and reduce gas flaring. According to the World bank, thousands of gas flares at oil production sites worldwide burned approximately 144 billion m^3 of gas in 2021. Flaring can be avoided far more easily than many other sources of greenhouse gas (GHG) emissions. The gas could be put to good use and potentially displace other more polluting fuels, such as coal and diesel, that generate higher emissions per energy unit.[680]

The 2006 EU Directive 2006/21/EC on the management of waste of mining industries requests that EU member states ensure extractive waste is managed without endangering human health or the environment. The member states also need to take the necessary precautions to prohibit the uncontrolled abandonment, dumping and disposal of extractive waste.

Standards for the disposal of offshore drilling platforms are drafted by the OSPAR Convention in OSPAR Decision 98/3 on the Disposal of Disused Offshore Installations. This decision states that oil companies have to choose the method of dismantling that causes the least harm to the environment. In addition, companies have to make adequate provisions to overcome any environmental problems involved in dismantling. They have to take responsibility for the dismantling of their production capacity and the waste they produce and can no longer leave this to governments.

This leads to assessment elements	
2	Companies reduce waste from oil and gas extraction and mining, especially the flaring of natural gas, and manage and process this in a responsible way.

- **Water use**

  Given the growing challenge of water scarcity in many regions of the world, it is vital that oil and gas companies and financial institutions become aware of their own influences on water-related problems. Various initiatives, guidelines, and standards have emerged in recent years to help companies address water risk.

  International standards and assessment elements about water use are covered in the cross-cutting theme Biodiversity (section 2.1).

- **Effects on marine life**

  In the offshore oil and gas industry, seismological research causes harm to whales and other marine mammals. To curb these effects, the Joint Nature Conservation Committee of the UK government (JNCC) published guidelines for minimising the risk of injury to marine life by geophysical surveys in August 2017. These comprise of a number of minimum requirements that reduce harm to marine life off the coast of the United Kingdom.

  The 2015 IFC Environmental, Health, and Safety Guidelines for Offshore Oil and Gas Development also include guidelines on reducing noise from seismic operations.

This leads to assessment element	
3	Companies reduce the effects of seismological research on whales and other marine mammals.

- **Labour rights**

  As part of respecting human rights, it is of great importance that oil and gas companies adhere to the United Nations International Labour organisation's (ILO) main codes of conduct. These are the 1998 ILO Declaration on Fundamental Principles and Rights at Work and the Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy (MNE Declaration). In addition, specifically for the extractive industry, the Convention concerning Safety and Health in Mines (No. 176) should be taken into account. The rights of women in the extractive industry are recognised in the 2013 Iroco Declaration.

  Assessment elements about labour rights are covered in the cross-cutting theme Labour rights (section 2.6).

- **Land rights conflicts and forced evictions**

  Human rights, particularly economic, social, and cultural (ESC) rights, play a central role in land-related issues. However, there is no explicit recognition of a 'human right to land' within international human rights instruments. Those who face threats to their land rely on other rights, such as the right to food, the right to water, the right to housing and the right to work. These rights are included in the International Covenant on Economic, Social and Cultural Rights (ICESCR).[681] Women's land rights and indigenous peoples' land rights are also recognised in:

- ILO Convention concerning Indigenous and Tribal Peoples (No. 169), Articles 6, 7, 16 and 22; and
- The Convention on the Elimination of all forms of Discrimination against Women (CEDAW), Article 14.

In 2017, OECD released the OECD Due Diligence Guidance for Meaningful Stakeholder Engagement in the Extractive Sector, providing guidance to mining, oil, and gas enterprises in addressing the challenges related to stakeholder engagement. It is part of a series of sectoral guidance for the application of the recommendations found in the OECD Guidelines for Multinational Enterprises.

Other international standards and assessment elements on land rights and forced evictions are covered in the cross-cutting theme Human rights (section 2.5).

- **Transparency of financial flows**

The Extractive Industries Transparency Initiative (EITI), a coalition of governments, companies, CSOs and investors has drafted criteria for governments of countries where oil and gas extraction and mining take place. Governments are expected to publish all revenues they receive from these activities.

The Publish What You Pay coalition, which includes over 300 social organisations, advocates that oil companies publicly disclose their payments to governments. This means that companies must report their tax payments in the countries where they operate, as well as royalties, payments for concessions and such. Also, the important contracts and agreements between governments and oil companies and all bank loans related to oil and gas extraction and mining should be made public.

Assessment elements about tax transparency are covered in the cross-cutting theme Tax (section 2.7).

- **Good governance**

In order to minimise the negative consequences of the *resource curse*, it is important that the development of oil and gas extraction and mining is combined with the development of capable and reliable governance. The World Bank Extractives Industries Review (EIR) advises that private investments in oil and gas extraction and mining are not encouraged in countries where governance is weak. It also establishes that the quality of the governance has to meet explicit conditions before any oil and gas project can be financed by the World Bank.

The UNGPs point to heightened risks of involvement in gross human rights abuses in conflict-affected areas. A company should manage its own impact in order to prevent involvement in human rights violations.

The OECD Risk Awareness Tool for Multinational Enterprises in Weak Governance Zones could help detect areas where strong governance is needed to avoid human rights abuses or to refrain from doing business.

This leads to assessment element	
4	Companies only operate in weak governance zone or conflict-affected areas if they are able to demonstrate that they are not causing or contributing to human rights abuses.

- **Unconventional oil and gas sources and phase-out**

  Due to the continuing increase in demand for fossil fuels, unconventional oil sources - such as the Canadian tar sand fields, oil shale in the United States and the extraction of shale gas or coal gas – have become economically attractive, although extracting these unconventional oil supplies is highly polluting, CO_2-intensive and uses vast amounts of water.[682]

  The goal of the 2015 Paris Agreement is to "strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius".[683] WWF reports that "new Arctic Ocean oil and gas leases would pave the way for the release of millions of tons of CO2 into the atmosphere". In addition, "major oil spills are a near certainty for Arctic drilling", while "there is no proven technology to contain or clean up oil spilled in the Arctic marine environment".[684] WWF also published an Asset Owner Guide to Oil & Gas Producers in 2019, outlining the growing financial risks of continued investment in the oil and gas industries, as well as providing recommendations for asset owners seeking to align their portfolio with the Paris agreement.

  The UN Environment Programme Emissions Gap Report 2022 emphasizes that the world is falling short of the Paris climate goals, and must cut emissions by 45 per cent to avoid global catastrophe[685] A rapid transition of the global energy sector is considered key to meeting these targets and requires at least:[686]

  - "Expanding Renewable Energy for electrification;
  - Phasing out coal for rapid decarbonization of the energy system;
  - Decarbonizing transport with a focus on electric mobility;
  - Decarbonizing energy-intensive industry; and
  - Avoiding future emissions while improving energy access."

  In May 2021, the International Energy Agency (IEA) released a new report Net-zero by 2050: A roadmap for the global energy sector, which describes a pathway towards a net zero CO2 emissions in the energy sector by 2050. Among the essential measures described to reach net zero emissions by 2050, the IEA calls for an immediate end to new investment in fossil-fuel extraction and net-zero electricity by 2040.[687]

  The Global Oil and Gas Exit List (GOGEL) has been published annually since 2021 and provides a "company-level database with detailed information on companies operating in the upstream and/or midstream subsectors of the oil & gas industry", covering over 900 companies responsible for more than 95% of global oil and gas production. GOGEL also includes data on oil and gas companies' expansion plans and the extent to which they overshoot the IEA Net Zero Emissions Pathway.

This leads to assessment elements	
5	Companies active in the extraction of oil from tar sands are excluded from investment and financing.
6	Extracting oil from oil shale is unacceptable.
7	Extracting shale gas in unacceptable.
8	Arctic drilling for oil and gas is unacceptable.
9	Companies engaged in new oil and gas exploration and development are excluded from investment and financing.
10	Construction of new oil and gas pipelines is unacceptable.
11	Companies phase out their oil and gas operations in line with a 1.5-degrees scenario.

- **Sustainability reporting**

  The best known guidelines for sustainability reporting in general are the Global Reporting Initiative (GRI) Standards. The new GRI Universal Standard was released in 2021, which will be complemented by various *Sector* and *Topic Standards*.[688] The GRI 11 Oil and Gas Sector 2021GRI 11 Oil and Gas Sector 2021 standard includes guidelines on companies active in exploration, extraction, production, refining, and transport and sale of oil, gas and petrochemicals.

This leads to assessment elements	
12	Companies publish a sustainability report that is set up in accordance with recognised sustainability reporting frameworks

- **Procurement and supply chains**

  Companies are often part of long procurement and supply chains. They can monitor one another and question how they respect local and national legislation and international norms regarding social, economic, and environmental issues. The requirements that companies set for their suppliers can be included in contractual agreements. The importance of this also recognised in the OECD Guidelines for Multinational Enterprises.

  ISO 26000:2010 Guidance on social responsibility recognises the importance of supply chain responsibility, because “the impacts of an organisation's decisions or activities can be greatly affected by its relationships with other organisations”.[689] A company’s sphere of influence includes relationships within and beyond an organisation’s supply chain. Moreover, ISO 26000:2010 Guidance on social responsibility recommends setting contractual provisions or incentives as a means of exercising influence.[690]

  In addition, ISO 20400:2017 Sustainable procurement – Guidance provides guidelines for organisations, independent of their activity or size, on integrating sustainability within procurement, as described in ISO 26000:2010 Guidance on social responsibility. It is intended for stakeholders involved in, or impacted by, procurement decisions and processes.

  The UNGPs include a due diligence process in order to identify, prevent, mitigate and account for how companies address their adverse human rights impacts. The process “should cover adverse human rights impacts that the business enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships.”[691]

This leads to assessment elements	
13	Companies integrate environmental, social and governance criteria in their procurement and operational policies.
14	Companies include clauses on the compliance with environmental, social and governance criteria in their contracts with subcontractors and suppliers.

4.6 Power Generation

4.6.1 Assessment elements

Financial institutions investing in, or financing companies in the energy sector should carefully consider how they can orient their investments to support the transition to a low-carbon economy, in line with the pathways suggested by the IPCC. This may be through choosing to support exclusively renewable energy generation, or by setting out a clear pathway to reduce finance for fossil fuels and other controversial energy sources and replace this with low-carbon finance.

The following elements are related to the financial institution's strategy and transparency regarding financings and investments in the power generation sector:

1. The financial institution has a measurable target to increase its finance for renewable energy generation.
2. The financial institution has a measurable target to reduce either its total amount of finance for fossil fuel-fired power generation, or to reduce finance for fossil fuel-fired power generation, relative to its finance for renewable energy generation.

The following elements are crucial expectations towards the companies a financial institution invests in or finances:

3. Companies involved in the development of new coal-fired power plants are excluded from investment and financing.
4. The financial institution excludes financing and investing in companies active in coal-fired power for more than 20% of their activities.
5. The financial institution excludes financing and investing in companies active in oil and gas-fired power generation for more than 30% of their electricity generated.
6. Nuclear energy is unacceptable.
7. Large scale hydropower generation is unacceptable.
8. The construction of dams complies with the 7 principles of the World Commission on Dams or the Hydropower Sustainability Assessment Protocol.
9. Woody biomass (also called "pellets") should not come from land with a high biodiversity value AND can only be used for small-scale dedicated biomass power plants equipped with heat utilisation.
10. Companies publish a sustainability report that is set up in accordance with recognised sustainability reporting frameworks.
11. Companies integrate environmental, social and governance criteria in their procurement and operational policies.
12. Companies include clauses on the compliance with environmental, social and governance criteria in their contracts with subcontractors and suppliers.

4.6.2 What is at stake?

Power generation is essential to meet society's demands for energy and is central to efforts to achieve sustainable development and poverty reduction. There are many pressures on energy suppliers to generate power in a manner that offers security of supply, is affordable for consumers, and has a minimal level of negative environmental impacts.

A crucial concern regarding power generation is its impact on climate change. Electricity and heat production is the largest source of anthropogenic greenhouse gas emissions, accounting for roughly 34% of global emissions in 2019.[692] See for more information, the cross-cutting theme Climate change (section 2.2).

Climate change is not the only environmental or social issue arising from power generation from fossil fuels. Coal-fired power plants have particularly egregious impacts. As well as releasing carbon dioxide, burning coal emits pollutants including sulphur dioxide, nitrogen oxides, and mercury compounds. Fine particles from coal-fired power plants cause an estimated 22,900 deaths each year in the European Union alone, according to CAN Europe, HEAL, WWF European Policy Office and Sandbag.[693] Coal-fired power plants also use large quantities of water, which becomes polluted with heavy metals such as lead and arsenic during use. Soil at coal-fired power plant sites can become contaminated with various pollutants and take a long time to recover, even after the power plant closes down.[694] Gas-fired power plants are also associated with emissions of air pollutants including carbon dioxide and nitrous oxides, although these are lower than for coal.[695]

Nuclear power is considered a low carbon power source by the IPCC, but its use remains highly controversial. The dangers of nuclear power were illustrated by accidents including those at Chernobyl, Ukraine in 1986, at Tokaimura, Japan, in 1999, and at Fukushima, Japan in 2011. Nuclear power also produces a legacy of radioactive nuclear waste, for which the issue of long-term safe storage remains unsolved. For these reasons, as well as for economic reasons (in particular, the cost of decommissioning nuclear power stations at the end of their useful life), major environmental groups, including Greenpeace and WWF, continue to oppose nuclear power.[696]

Among power generation technologies considered “renewable”, large dams are the most controversial. According to the final report of the World Commission on Dams (WCD), published in November 2000, the construction of large dams had driven between 40 and 80 million people away from their homes worldwide.[697] Such large hydropower projects also disrupt the traditional lifestyles of displaced communities, affect livelihoods, especially for Indigenous Peoples, and threaten cultural heritage. These dams also directly harm migratory fish by altering water levels and flow patterns.[698] In addition, dams (including dams for water management) have interrupted or reclaimed 60% of the world’s rivers, with often huge and irreversible effects on the natural environment and ecosystems. Research also shows that hydropower plants may produce large volumes of methane gas, a very potent greenhouse gas that arises from the decay of vegetation on the bottom of the reservoir. The methane gas is released when the water is led through the turbines. In some cases, hydropower plants produce more greenhouse gas than a power plant of comparable scope running on fossil fuel.[699]

Given the serious, irreversible ecological impacts of dams, civil society organisations such as International Rivers say that dam-based hydropower cannot be considered a renewable source of power. However, this does not mean that all hydropower is problematic: many smaller (‘micro’ and ‘pico’) hydropower projects operate without damming rivers, and these projects can offer low-emissions energy without substantial negative impacts.[700]

The importance of power generation is addressed in Sustainable Development Goal (SDG) 7: Affordable and Clean Energy. It aims to improve access to affordable, reliable, and modern energy services and to increase the share of renewable energy in the global energy mix by 2030. Another target is to double the rate of energy efficiency by 2030. Further, the SDG 7 aims to enhance international cooperation to facilitate access to clean energy research and technology, including renewable energy, energy efficiency and advanced and cleaner fossil-fuel technology, and promote investment in energy infrastructure and clean energy technology.[701] Clean energy is also important for achieving many other SDGs such as SDG 1: No Poverty, SDG 8: Decent Work and Economic Growth, SDG 9: Industry, Innovation and Infrastructure, SDG 10: Reduced Inequalities and SDG 11: Sustainable Cities and Communities. At the same time, power generation, if not done responsibly, can hinder SDG 13: Climate Action, SDG 14: Life Below Water and SDG 15: Life on Land.[702]

In general, power generation using other forms of renewable energy, including wind power, solar power, geothermal power, smaller scale hydroelectric power as well as tidal marine power, are responsible for much lower emissions of greenhouse gasses than fossil fuels (although due to the emissions from the construction, maintenance, and decommissioning of technologies like solar panels and wind farms, these technologies are not completely free of harmful emissions). It is generally agreed by environmental groups and climate scientists that a substantial increase in investments in renewable energy is needed, alongside investment in energy efficiency and reduction of demand, to decarbonize the energy sector and meet emissions reduction targets.

Financial institutions financing power generation from renewable energy must also be mindful of its potential impacts on land use, wildlife, and local communities. When developing policies for the power generation sector, financial institutions can make use of the international standards described below.

4.6.3 International standards and initiatives

The main international standards on power generation are summarised per topic, followed by the assessment elements that are formulated by the FFGI Methodology as a result:

- **Transition to a low carbon economy**

  In its 2018 Special Report the IPCC emphasizes that even though limiting global warming to 1.5°C is technically feasible, all of the modelled emission pathways consistent with such a target require rapid decarbonisation of the global energy infrastructure.[703]

  The UN Environment Programme Emissions Gap Report 2022 emphasizes that the world is on the brink of missing the opportunity to limit global warming to 1.5°C, “with no credible pathway to 1.5°C in place”. Meeting that target would require global annual GHG emissions reduction by 45 per cent compared with emissions projections under policies currently in place in just eight years.[704] A rapid transition of the global energy sector is considered key to meeting these targets and requires at least:[705]

  - Steeply accelerate the share of zero-carbon power in electricity generation;
  - Phase out unabated coal and gas generation;
  - Adapt grid/storage and demand management; and
  - Ensure reliable energy access for all.

  In May 2021, the International Energy Agency (IEA) released the long-expected report Net-zero by 2050: A roadmap for the global energy sector, which describes a pathway towards a net zero CO_2 emissions in the energy sector by 2050. Among the essential measures described to reach net zero emissions by 2050: [706]

  - The IEA calls for an immediate end to new investment in fossil-fuel extraction and net-zero electricity by 2040. The IEA also calls for all unabated coal plants and oil power plant in advanced economies to be phased out by 2030 and in all economies by 2040.
  - Annual renewable electricity installations must triple by 2030. In IEA’s pathway to net zero, almost 90% of global electricity generation in 2050 comes from renewable sources. For solar power, it is equivalent to installing the world’s current largest solar park roughly every day. This also means that annual clear energy investment worldwide will need to more than triple by 2030 to around USD 4 trillion.
  - Major innovation must take place in the coming decade as in 2050, almost half the CO_2 emissions reductions will come from technologies that are currently at the demonstration or prototype phase.

  The Global Coal Exit List published by Urgewald, is updated annually and “provides key statistics on over 1600 companies whose activities range from coal exploration and mining, coal trading and transport, to coal power generation and the manufacturing of coal plants”,[707] because “investments in new coal power capacity are incompatible with the Paris climate goals as each new coal plant locks-in high CO_2 emissions for decades to come”.[708]

Nuclear energy is not a sustainable alternative to fossil fuel-fired power generation. Aside from the risk of catastrophic meltdowns (as in the 2011 Fukushima case), Greenpeace argues “there is still no safe, reliable solution for dealing with the radioactive waste produced by nuclear plants”.[709]

This leads to assessment elements	
1	The financial institution has a measurable target to increase its finance for renewable energy generation.
2	The financial institution has a measurable target to reduce either its total amount of finance for fossil fuel-fired power generation, or to reduce finance for fossil fuel-fired power generation, relative to its finance for renewable energy generation.
3	Companies do not develop new coal-fired power plants.
4	The financial institution excludes financing and investing in companies active in coal fired power for more than 20% of their activities.
5	The financial institution excludes financing and investing in companies active in oil and gas-fired power generation for more than 30% of their electricity generated.
6	Nuclear energy is unacceptable.

- **Areas of high biodiversity and protected areas**

  Various international agreements require the protection of ecosystems and natural habitats:

  - The biodiversity in areas that are important on environmental and cultural grounds falls under the protection of the UNESCO World Heritage Convention.
  - For *wetlands* (swamps and bogs), which are rich in biodiversity, there is the Ramsar Convention on Wetlands that ensures protection and proper management of these areas.
  - The International Union for Conservation of Nature (IUCN) has developed a system that categorises natural areas in six categories and indicates in which areas biodiversity has to be protected (category I to IV). In addition, the IUCN provides guidelines for companies on how to deal with fields that fall within these Protected Area Management Categories. In 2000, a resolution was adopted on the IUCN World Conservation Congress that calls upon all states not to allow investments in oil, gas, and extractive industry projects in the protected areas (categories I to IV).
  - The United Nations Environmental Assembly adopted a resolution on pollution mitigation by mainstreaming biodiversity into key sectors in 2017, aiming at “strengthening efforts to integrate conservation and sustainable use of biodiversity in various sectors such as agriculture, fisheries and aquaculture, tourism, mining and energy, infrastructure and manufacturing among others. It also points to the need to prevent and reduce pollution from these sectors”.[710]

  These areas are also included in the analyses for investments by International Finance Corporation’s (IFC) Performance Standard 6 concerning Biodiversity Conservation and Sustainable Management of Living Natural Resources. It determines how companies should operate in order to avoid negative consequences on areas of high biodiversity value, including impact on natural habitats as well as endangered and endemic species. The requirements in the standard have been guided by the Convention on Biological Diversity.

  Assessment elements about biodiversity are covered in the cross-cutting theme Biodiversity (section 2.1).

- **Land rights conflicts and forced evictions**

Human rights, particularly economic, social, and cultural (ESC) rights, play a central role in land-related issues. However, there is no explicit recognition of a 'human right to land' within international human rights instruments. Those who face threats to their land rely on other rights, such as the right to food, the right to water, the right to housing and the right to work. These rights are included in the International Covenant on Economic, Social and Cultural Rights (ICESCR).[711] Women's land rights and indigenous peoples' land rights are also recognised in:

- ILO Convention concerning Indigenous and Tribal Peoples (No. 169), Articles 6, 7, 16 and 22; and
- The Convention on the Elimination of all forms of Discrimination against Women (CEDAW), Article 14.

Other standards and assessment elements on land rights and forced evictions are covered in the cross-cutting theme Human rights (section 2.5).

- **Dams and hydropower**

Large-scale hydroelectric dams,[i] while officially considered a renewable source of energy, are associated with considerable negative social and environmental impacts. Construction of new dams can displace local populations or deprive them of sources of water and income. Large hydroelectric dams can have disastrous consequences for local ecosystems, biodiversity, and under certain conditions emit significant amounts of greenhouse gases.[712]

The most authoritative international guidelines for dam projects were drafted in November 2000 by the World Commission on Dams (WCD). The WCD was established by the World Bank and the International Union for Conservation of Nature and has raised many environmental and social issues associated with large dam construction. In its final report (2002), the committee provided a series of recommendations on which future dam projects can base their environmental and social plans.[713]

The recommendations are centred around the issue of who carries the rights and who is responsible for the risks in dam projects. The recommendations themselves comprise of seven strategic priorities and supported principles:[714]

- obtaining public consent;
- solid assessment of alternatives;
- standard for existing dams;
- the preservation of rivers as a source of livelihood;
- respect of rights and sharing revenues;
- focus on compliance; and
- sharing rivers for peace, development, and safety.

Any problems that occur during the construction of dams also occur in similar water infrastructure projects, such as navigation work, pumping water between reservoirs and large irrigation projects. Therefore, the above-described principles should also apply to the development of these types of projects.

In 2008, the International Hydropower Association (IHA) launched the Hydropower Sustainability Assessment Forum (HSAF), a multi-stakeholder forum that has developed three key tools to assess the sustainability of hydropower projects:[715]

- The Hydropower Sustainability Guidelines on Good International Industry Practice (HGIIP Guidelines) provide general guidance on good practice and expected performance in promoting hydropower sustainability;

[i] Large dams are dams with a height of at least 15 metres or producing more than 30 megawatts, as defined by the International Commission on Large Dams and The US Department of Energy respectively.

- The Hydropower Sustainability Assessment Protocol (HSAP) provides a benchmarking tool to assess sustainability performance against the HGIIP Guidelines through comparison with basic good practices and proven best practices; and
- The Hydropower Sustainability ESG Gap Analysis (HESG) is used to identify gaps compared to good practice on environmental, social and governance (ESG) performance, and provides guidance on gap management in hydropower sustainability.

This leads to assessment elements	
7	Large scale hydropower generation is unacceptable.
8	The construction of dams complies with the 7 principles of the World Commission on Dams or the Hydropower Sustainability Assessment Protocol.

- **Biomass**

  Whether using biomass for electricity production could be helpful in reducing greenhouse gas emissions ultimately depends on the conditions under which the biomass is grown. As such, biomass crops are typically grown on agricultural land that was already used for growing food or feed. Agricultural production is consequently displaced to other areas, leading to conversion of forests or natural grasslands to agricultural lands elsewhere. This process is called Indirect Land Use Change (ILUC).[716]

  The EU Renewable Energy Directive EU/2018/2001 and its subsequent 2023 amendment prohibit the use of raw materials from land with a high biodiversity value, such as primary forests, protected areas, and areas recognised by competent authorities such as the International Union for the Conservation of Nature.

This leads to assessment element	
9	Woody biomass (also called "pellets") should not come from land with a high biodiversity value AND can only be used for small-scale dedicated biomass power plants equipped with heat utilisation.

- **Sustainability reporting**

  The best known guidelines for sustainability reporting in general are the Global Reporting Initiative (GRI) Standards. The new GRI Universal Standard was released in 2021, which will be complemented by various *Sector* and *Topic Standards*.[717] A total of 40 Sector Standards is under development.

This leads to assessment element	
10	Companies publish a sustainability report that is set up in accordance with recognised sustainability reporting frameworks.

- **Procurement and supply chains**

  Companies are often part of long procurement and supply chains. They can monitor one another and question how they respect local and national legislation and international norms regarding social, economic, and environmental issues. The requirements that companies set for their suppliers can be included in contractual agreements. The importance of this is also recognised in the OECD Guidelines for Multinational Enterprises.

  ISO 26000:2010 Guidance on social responsibility recognises the importance of supply chain responsibility, because "the impacts of an organisation's decisions or activities can be greatly affected by its relationships with other organisations". A company's sphere of influence includes relationships within and beyond an organisation's supply chain. Moreover, ISO 26000:2010 Guidance on social responsibility recommends setting contractual provisions or incentives as a means of exercising influence.

In addition, ISO 20400:2017 Sustainable procurement – Guidance provides guidelines for organisations, independent of their activity or size, on integrating sustainability within procurement, as described in ISO 26000:2010 Guidance on social responsibility. It is intended for stakeholders involved in, or impacted by, procurement decisions and processes.

The UNGPs include a due diligence process in order to identify, prevent, mitigate and account for how companies address their adverse human rights impacts. The process "should cover adverse human rights impacts that the business enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships."

This leads to assessment elements	
11	Companies integrate environmental, social and governance criteria in their procurement and operational policies.
12	Companies include clauses on the compliance with environmental, social and governance criteria in their contracts with subcontractors and suppliers.

References

1 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO.

2 OECD (2023), OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, OECD Publishing, Paris, https://doi.org/10.1787/81f92357-en p.14.

3 European Commission (2014), Corporate Social Responsibility National Public Policies in the European Union Compendium 2014, London, the United Kingdom: European Commission.

4 OECD (2022), Responsible Business Conduct Due Diligence for Project and Asset Finance Transactions, OECD Business and Finance Policy Papers, Paris, France: OECD;

OECD (2019), Due Diligence for Responsible Corporate Lending and Securities Underwriting: Key considerations for banks implementing the OECD Guidelines for Multinational Enterprises, Paris, France: OECD;

OECD (2017), Responsible business conduct for institutional investors: Key considerations for due diligence under the OECD Guidelines for Multinational Enterprises, Paris, France: OECD.

5 Investopedia (2014), "Definition of 'Pension Fund'", online: http://www.investopedia.com/terms/p/pensionfund.asp, Viewed in December 2024.

6 Institute for Responsible Investment (2007), Handbook on Responsible Investment Across Asset Classes, Chestnut Hill, the United States: Boston College Center for Corporate Citizenship.

7 Investopedia (2014), "Definition of 'Hedge Fund'", online: http://www.investopedia.com/terms/h/hedgefund.asp, Viewed in December 2024.

8 Thinking Ahead Institute (2023, September), *Global top 300 pension funds*, p.7.

9 UNEP and PRI (2019), *Fiduciary duty in the 21st century*, Paris, France: UNEP Finance Initiative and London, the United Kingdom: PRI Association.

10 The Principles for Responsible Investment (2021, January)), Selecting, appointing and monitoring investment managers, London, the United Kingdom: PRI.

11 UNCTAD (2010), Investment and Enterprise Responsibility Review. Analysis of Investor and Enterprise Policies on Corporate Social Responsibility, Switzerland, Geneva: UNCTAD;

UNEP and PRI (2011), Universal Ownership. Why Environmental Externalities Matter to Institutional Investors, Paris, France: UNEP Finance Initiative and London, the United Kingdom: PRI Association.

12 OECD (n.d.), ''Development finance institutions and private sector development'', online: https://web-archive.oecd.org/temp/2024-02-15/237075-development-finance-institutions-private-sector-development.htm , viewed in December 2024.

13 Fair Finance Southern Africa (n.d.), "Policy Assessment", online: https://www.fairfinancesouthernafrica.org/policy-assessment/, viewed in January 2025.

14 IEEP (2016), "IEEP steps up work on the multiple benefits of biodiversity", online: www.ieep.eu/news/biodiversity/valuing-biodiversity-and-ecosystem-services/ieep-steps-up-work-on-the-multiple-benefits-of-biodiversity, viewed in November 2022.

15 IPBES (2019), Summary for Policymakers of the Global Assessment Report on Biodiversity and Ecosystem Services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services, Bonn, Germany: Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services, online: https://zenodo.org/records/3553579, viewed in December 2024.

16 Dasgupta, P. (2021, February), The Economics of Biodiversity: The Dasgupta Review, London, United Kingdom: HM Treasury.

17 NGFS (2024, July), "Nature-related Financial Risks: a Conceptual Framework to guide Action by Central Banks and Supervisors", online: https://www.ngfs.net/sites/default/files/medias/documents/ngfs-conceptual-framework-nature-risks.pdf

18 UNEP (n.d.), "Rate of Environmental Damage Increasing Across Planet but Still Time to Reverse Worst Impacts", online: www.un.org/sustainabledevelopment/blog/2016/05/rate-of-environmental-damage-increasing-across-planet-but-still-time-to-reverse-worst-impacts/, Viewed in December 2024.

19 UNEP(n.d.), Global Environmental Outlook 7, online: https://www.unep.org/geo/global-environment-outlook-7, viewed in December 2024.

20 IPCC (2022, February 28), Climate Change 2022: Impacts, Adaptation and Vulnerability - Summary for Policymakers of the IPCC Working Group II report, , Geneva, Switzerland: Intergovernmental Panel on Climate Change, online: https://www.ipcc.ch/report/ar6/wg2/chapter/summary-for-policymakers/.

21 United Nations (n.d.), "Sustainable Development Goal 14", online: https://sdgs.un.org/goals/goal14, Viewed in December 2024.

22 United Nations (n.d.), "Sustainable Development Goal 15", online: https://sdgs.un.org/goals/goal15, Viewed in December 2024.

23 United Nations (n.d.), "Sustainable Development Goal 2", online: https://sdgs.un.org/goals/goal2, Viewed in December 2024.

24 United Nations (n.d.), "Sustainable Development Goal 3", online: https://sdgs.un.org/goals/goal3, Viewed in December 2024.

25 United Nations (n.d.), "Sustainable Development Goal 6", online: https://sdgs.un.org/goals/goal6, Viewed in December 2024.

26 Saikku, L. et al (2015), Implementing the Green Economy in a European context: Lessons learned from theories, concepts and case studies, p. 7, Helsinki, Finland: Partnership for European Environmental Research.

27 Saikku, L. et al (2015), Implementing the Green Economy in a European context: Lessons learned from theories, concepts and case studies, p. 8, Helsinki, Finland: Partnership for European Environmental Research.

28 WWF International (2023, July), "Financing Green – Unlocking Finance for Nature and People", online: https://wwfint.awsassets.panda.org/downloads/wwf_financing_green_brochure_july_2023_lr.pdf

29 Forests & Finance (2024, October), "Banking on Biodiversity Collapse 2024", online: https://forestsandfinance.org/banking-on-biodiversity-collapse/

30 Banktrack (2024, October 23), '' From COP16: Global NGOs file formal complaint to UNEP over its role in the TNFD'', online: https://www.banktrack.org/article/complaint_unep_backing_to_tnfd_has_undermined_and_worked_against_environmental_defenders_rights_holders_and_civil_society_groups, viewed in December 2024.

31 GRI (2021, September), A Short Introduction to the GRI Standards, Amsterdam; the Netherlands.

32 GRI (n.d.),.), "Topic Standard Project for Biodiversity, online: https://www.globalreporting.org/standards/standards-development/topic-standard-for-biodiversity/, viewed in December 2024.

33 Convention on Biological Diversity (n.d.), "The Convention - List of Parties", online: www.cbd.int/information/parties.shtml, Viewed in December 2024.

34 CBD (2022, December 19), "By 2030: Protect 30% of Earth's lands, oceans, coastal areas, inland waters; Reduce by $500 billion annual harmful government subsidies; Cut food waste in half" Official CBD Press Release - 19 December 2022, Montreal.

35 UN Environment (2017, 14 December), "UN Environment Assembly moves to curb pollution from extractive industries", online: www.unenvironment.org/news-and-stories/story/un-environment-assembly-moves-curb-pollution-extractive-industries, Viewed in December 2024.

36 European Commission (2022, December 6), "Green Deal: EU agrees law to fight global deforestation and forest degradation driven by EU production and consumption", online: https://ec.europa.eu/commission/presscorner/detail/en/ip_22_7444 , viewed in January 2023

37 European Commission (2021, November 17), "Proposal for a regulation on deforestation-free products", online: https://environment.ec.europa.eu/publications/proposal-regulation-deforestation-free-products_en, viewed in January 2023

38 European Council (2024, December 3), "Press release - EU deforestation law: Council and Parliament agree on its targeted amendment", online: https://www.consilium.europa.eu/en/press/press-releases/2024/12/03/eu-deforestation-law-council-and-parliament-agree-on-its-targeted-amendment/

39 Convention on Biological Diversity. (2022). *Decision adopted by the Conference of the Parties to the Convention on Biological Diversity: Kunming-Montreal Global Biodiversity Framework (Decision COP-15/4).* Online: https://www.cbd.int/doc/decisions/cop-15/cop-15-dec-04-en.pdf

40 High Seas Alliance (n.d.), "High Seas Treaty Ratification Tracker", online: https://highseasalliance.org/treaty-ratification/, viewed in December 2024.

41 Inter alia: International Convention for the Regulation of Whaling (1946);

Agreement on the Conservation of Polar Bears (1973);

North Pacific Fur Seal Convention (1911);

Convention for the Conservation of Antarctic Seals (1972);

Inter-American Convention for the Conservation of Sea Turtles (1996).

42 CITES (n.d.), "How CITES works", online: www.cites.org/eng/disc/how.php, viewed in November 2022.

43 United Nations (1992, June), UN Convention on Biological Diversity.

44 UN (2017, June 9), "Our Oceans, Our Future: Call for Action", online: https://oceanconference.un.org/callforaction, Viewed in December 2024.

45 Secretariat of the Basel, Rotterdam and Stockholm Conventions (2019, May 10), "Governments agree landmark decisions to protect people and planet from hazardous chemicals and waste, including plastic waste", online: www.brsmeas.org/?tabid=8005, Viewed in December 2024.

46 UNEP (2022, March 2), What you need to know about the plastic pollution resolution, online: https://www.unep.org/news-and-stories/story/what-you-need-know-about-plastic-pollution-resolution, Viewed in December 2024

47 UNEP (2024, December 2), "Press release - Plastic pollution negotiations adjourn with new text and a follow-up session planned", online: https://www.unep.org/inc-plastic-pollution/media#PressRelease2Dec

48 IUCN (2022, May), "Issues Brief – Deep-Sea Mining", IUCN, online: https://www.iucn.org/sites/default/files/2022-07/iucn-issues-brief_dsm_update_final.pdf

49 ISO (2010), ISO 26000:2010 Guidance on social responsibility, Geneva, Switzerland: ISO.

50 Wilmar International (2013, December 5), "No Deforestation, No Peat, No Exploitation Policy", online: www.wilmar-international.com/wp-content/uploads/2012/11/No-Deforestation-No-Peat-No-Exploitation-Policy.pdf, viewed in November 2022.

51 Finance for Biodiversity Pledge (2020, 25 September), Finance for Biodiversity: Reverse nature loss in this decade, p. 2.

52 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO, p. 6.

53 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO, p. 72.

54 Berkeley Earth (2024, January 14), "Global Temperature Report for 2023", online: https://berkeleyearth.org/global-temperature-report-for-2023/, Viewed in November 2024.

IPCC (2014): Climate Change 2014: Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change, Geneva, Switzerland: Intergovernmental Panel on Climate Change, p. 151.

55 IPCC (2021), Climate Change 2021: The Physical Science Basis: Summary for Policymakers, Geneva, Switzerland, p. 4.

56 IPCC (2023), Climate Change 2023: Synthesis Report: Summary for Policymakers, Geneva, Switzerland.

57 IPCC (2023), Climate Change 2023: Synthesis Report: Summary for Policymakers, Geneva, Switzerland.;

IPCC (2007), Climate Change 2007: Impacts, Adaptation and Vulnerability. Contribution of Working Group II to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change, , Cambridge, the United Kingdom: Cambridge University Press, p. 976;

Stern, N. (ed.) (2007), The Economics of Climate Change: the Stern Review, Cambridge, the United Kingdom: Cambridge University press.

58 Costello, M.J., M.M. Vale, W. Kiessling, S. Maharaj, J. Price, and G.H. Talukdar (2022), Cross-Chapter Paper 1: Biodiversity Hotspots. In: *Climate Change 2022: Impacts, Adaptation and Vulnerability.* Contribution of Working Group II to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change, Cambridge University Press, Cambridge, UK and New York, NY, USA, pp. 2123–2161

59 Cooley, S., D. Schoeman, L. Bopp, P. Boyd, S. Donner, D.Y. Ghebrehiwet, S.-I. Ito, W. Kiessling, P. Martinetto, E. Ojea, M.-F. Racault, B. Rost, and M. Skern-Mauritzen (2022), Oceans and Coastal Ecosystems and Their Services. In: *Climate Change 2022: Impacts, Adaptation and Vulnerability.* Contribution of Working Group II to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change, Cambridge University Press, Cambridge, UK and New York, NY, USA, pp. 379–550.

60 Kuzma, S., M.F.P. Bierkens, S. Lakshman, T. Luo, L. Saccoccia, E. H. Sutanudjaja, and R. Van Beek (2023), *Aqueduct 4.0: Updated decision-relevant global water risk indicators*, Technical Note, Washington, DC: World Resources Institute.

61 GUIVARCH, C., N.TACONET and A. MÉJEAN (2021, September), "Linking Climate and Inequality", *International Monetary Fund Finance & Development Magazine,* online: https://www.imf.org/en/Publications/fandd/issues/2021/09/climate-change-and-inequality-guivarch-mejean-taconet, viewed in December 2024.

62 UNFCCC (2015, December 12), Paris Agreement, p. 3.

63 UNEP (2022, October), Emissions Gap Raport 2022, p. XVI.

64 UNFCCC (2015, December 12), Historic Paris Agreement on Climate Change. 195 Nations Set Path to Keep Temperature Rise Well Below 2 Degrees Celsius;

UNFCCC (2016, January 29), Report of the Conference of the Parties on its twenty-first session, held in Paris from 30 November to 13 December 2015, p.2.

65 Climate Action Tracker (2023, December 5), "No change to warming as fossil fuel endgame brings focus onto false solutions", online: https://climateactiontracker.org/publications/no-change-to-warming-as-fossil-fuel-endgame-brings-focus-onto-false-solutions/, viewed in November 2024..

66 Climate Action Tracker (2015, December 8), "Climate pledges will bring 2.7°C of warming, potential for more action", online: climateactiontracker.org/news/253/Climate-pledges-will-bring-2.7C-of-warming-potential-for-more-action.html, Viewed in November 2024.

67 Oxfam (2014), Standing on the sidelines. Why food and beverage companies must do more to tackle climate change, Oxford, the United Kingdom: Oxfam GB, p. 1 – 38.

68 McGlade, C. and P. Elkins (2015), "The geographical distribution of fossil fuels unused when limiting global warming to 2°C", Nature, 517, p. 187–190.

69 Williamson, P. (2016, 11 February), Scrutinize CO2 removal methods, Nature, Volume 530, p. 153;

Tyndall Centre (2020, December), A Review of the Role of Fossil FuelBased Carbon Capture and Storage in the Energy System, Manchester, The United Kingdom: Friends of the Earth Scotland, Global Witness.

70 UNISDR (2015), Sendai Framework for Disaster Risk Reduction 2015-2030, Geneva, Switzerland: United Nation Office for Disaster Risk Reduction, p. 18.

71 UNEP (2016), The Adaptation Finance Gap Report 2016, Nairobi, Kenya: United Nations Environment Programme.

72 OECD (2016), 2020 Projections of Climate Finance Towards the USD 100 Billion Goal: Technical Note, Paris, France: OECD Publishing.

OECD (2019), Climate Finance Provided and Mobilised by Developed Countries in 2013-2017, Paris, France: OECD Publishing.

73 Oxfam GB (2022), *Climate finance short-changed The real value of the $100 billion commitment in 2019–20*, Oxford, the United Kingdom: Oxfam GB.

74 Oxfam GB (2014), Breaking the Standoff. Post-2020 climate finance in the Paris agreement, Oxford, the United Kingdom: Oxfam GB, p. 40.

75 UNFCCC (2022, 20 November), "COP27 Reaches Breakthrough Agreement on New "Loss and Damage" Fund for Vulnerable Countries", online: https://unfccc.int/news/cop27-reaches-breakthrough-agreement-on-new-loss-and-damage-fund-for-vulnerable-countries, viewed in November 2024.

76 World Bank Group (n.d.), “Fund for Responding to Loss and Damage”, online: https://www.worldbank.org/en/programs/funding-for-loss-and-damage, viewed in December 2024.

77 Eurodad (2014), UN Financing for Development Negotiations: What outcomes should be agreed in Addis Ababa in 2015?, Brussels, Belgium: Eurodad;

BankTrack (2017, 7 September), “Banks and coal”, online: www.banktrack.org/campaign/banks_and_coal, viewed in November 2024;

Urgewald (2017), “Global Coal Exit List: Divestment Made Easy!”, online: coalexit.org/, viewed in November 2024.

78 Akana, D. (2024, November 25), “COP29 ends in $300 billion deal, widespread dismay — and eyes toward COP30”, *Mongabay,* online: https://news.mongabay.com/2024/11/cop29-ends-in-300-billion-deal-widespread-dismay-and-eyes-toward-cop30/, viewed in December 2024.

79 FSB (20165, 21 January 16), “FSB announces membership of Task Force on Climate-related Financial Disclosures”, online: https://www.fsb.org/2016/01/fsb-announces-membership-of-task-force-on-climate-related-financial-disclosures/, Viewed in November 2024.

80 TCFD (2017, June), Recommendations of the Task Force on Climate-related Financial Disclosures, Basel, Switzerland: Financial Stability Board.

81 International Financial Reporting Standards (n,d,), “ISSB and TCFD”, online: https://www.ifrs.org/sustainability/tcfd/, viewed in November 2024.

82 UNFCCC (2015, December 12), Historic Paris Agreement on Climate Change. 195 Nations Set Path to Keep Temperature Rise Well Below 2 Degrees Celsius;

UNFCCC (2016, January 29), Report of the Conference of the Parties on its twenty-first session, held in Paris from 30 November to 13 December 2015, p.2.

83 Climate Action 100+ (n.d.), “About Climate Action 100+”, online: https://www.climateaction100.org/about/, Viewed in November 2024.

84 Climate Action 100+ (n.d.), “Companies”, online: https://www.climateaction100.org/whos-involved/companies/, Viewed in November 2024.

85 Climate Action 100+ (n.d.), “Investors”, online: https://www.climateaction100.org/whos-involved/investors/, Viewed in November 2024.

86 Climate Action 100+ (n.d.). ‘’About Climate Action 100+’’, online: https://www.climateaction100.org/about/, Viewed in November 2024.

87 Climate Action 100+ (n.d.). ‘Net Zero Company Benchmark’’, online: https://www.climateaction100.org/net-zero-company-benchmark/, viewed in November 2024.

88 GFANZ (n.d.), “Glasgow Financial Alliance for Net Zero”, online: https://www.gfanzero.com/, viewed in November 2024.

89 GFANZ (n.d.), “Member Commitments”, online: https://www.gfanzero.com/membership/, viewed in November 2024.

90 TCFD (2017, June), Recommendations of the Task Force on Climate-related Financial Disclosures, Basel, Switzerland: Financial Stability Board.

91 TCFD (2017, June), Implementing the Recommendations of the Task Force on Climate-related Financial Disclosures, Basel, Switzerland: Financial Stability Board.

92 TCFD (2017, June), Recommendations of the Task Force on Climate-related Financial Disclosures, Basel, Switzerland: Financial Stability Board, p. 13.

93 TCFD (2017, June), Implementing the Recommendations of the Task Force on Climate-related Financial Disclosures, Basel, Switzerland: Financial Stability Board, p. 24.

94 International Financial Reporting Standards (n,d,), “ISSB and TCFD”, online: https://www.ifrs.org/sustainability/tcfd/, viewed in November 2024.

95 European Commission (n.d.), “2030 climate targets”, online: https://climate.ec.europa.eu/eu-action/climate-strategies-targets/2030-climate-targets_en, Viewed in November 2024.

96 Responsible Investor (2020, 15 September), ''New Zealand becomes world's first country to introduce mandatory TCFD disclosure'', online: https://www.responsible-investor.com/articles/new-zealand-becomes-world-s-first-country-to-introduce-mandatory-tcfd-disclosure, Viewed in November 2024.

97 Green Central Banking (2021, 8 June), ''G7 nations agree on mandatory climate-related disclosure'', online: https://greencentralbanking.com/2021/06/08/g7-nations-mandatory-climate-related-disclosure/, Viewed in November 2024.

98 PCAF (2017, December), Paving the Way Towards a Harmonised Carbon Accounting Approach for the Financial Sector, Utrecht, the Netherlands: Ecofys.

99 UNEP (2024), *Emissions Gap Report 2024: No more hot air … please! With a massive gap between rhetoric and reality, countries draft new climate commitments,* Nairobi, Kenya: United Nations Environment Programme (UNEP), p. XV.

100 UNEP (2022), Emissions Gap Report 2022 : The Closing Window, Climate crisis calls for rapid transformation of societies.: United Nations Environment Programme (UNEP), p. 40.

101 UNEP (2017), The Emissions Gap Report 2017, United Nations Environment Programme (UNEP), Nairobi, Kenia, p. xv.

102 International Energy Agency (2023, September), *Net Zero Roadmap A Global Pathway to Keep the 1.5 °C Goal in Reach: 2023 Update*, Paris, France: IEA.

103 Reclaim Finance (2023), *METALLURGICAL COAL FINANCING: Time to call it off,* Paris, France: Reclaim Finance.

104 Schücking, H. (2017, 9 November), "It's time for impact divesting: the Global Coal Exit List for the finance industry is launched", BankTrack, online: www.banktrack.org/blog/its_time_for_impact_divesting_the_global_coal_exit_list_for_the_finance_industry_is_launched#, Viewed in November 2024.

105 Global Coal Exit List (n.d.), "Explore GCEL", online: https://www.coalexit.org/data, Viewed in November 2024.

106 World Health Organisation (2024, June 25), "Health consequences of air pollution on populations", online: https://www.who.int/news/item/25-06-2024-what-are-health-consequences-of-air-pollution-on-populations, viewed in December 2024.

107 European Commission (n.d.), "Biofuels", online: https://energy.ec.europa.eu/topics/renewable-energy/bioenergy/biofuels_en, viewed in November 2024;

Lapola, D.M. et al. (2010), "Indirect land-use changes can overcome carbon savings from biofuels in Brazil", PNAS, 107(8).

108 Bos, J. (2024), *Biofuel Blunders: Time to fix two decades of EU policies driving food insecurity*, Oxford, UK: Oxfam.

109 WWF (2024, June 26), "Briefing for EU Member States on bioenergy plans and policies", online: https://www.wwf.eu/?14165441/briefing-bioenergy-june-2024, viewed in January 2025.

110 Suzan, S. (2023), *Biofuels: From unsustainable crops to dubious waste?*, Brussels, Belgium: Transport & Environment, p. 5.

111 European Court of Auditors (2023), *The EU's support for sustainable biofuels in transport An unclear route ahead*, Luxembourg, p. 21.

112 Influence Map (2019, March), ''How the oil majors have spent $1Bn since Paris on narrative capture and lobbying on climate'', online: https://influencemap.org/report/How-Big-Oil-Continues-to-Oppose-the-Paris-Agreement-38212275958aa21196dae3b76220bddc, Viewed in November 2024.

113 OECD (2023), OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, Paris, France: OECD Publishing, p. 16.

114 Office of the United Nations High Commissioner for Human Rights (2023, July), "Paying polluters: the catastrophic consequences of investor-State dispute settlement for climate and environment action and human rights", online: https://www.ohchr.org/en/documents/thematic-reports/a78168-paying-polluters-catastrophic-consequences-investor-state-dispute, viewed in November 2024;

UNCTAD (n.d.), "Investment Dispute Settlement Navigator", online: https://investmentpolicy.unctad.org/investment-dispute-settlement, viewed in November 2024.

115 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO, p. 6.

116 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO, p. 72.

117 Climate Action 100+ (n.d.), "Investors", online: https://www.climateaction100.org/whos-involved/investors/, Viewed in November 2024.

118 Transparency International (n.d.), "What is corruption?", online: https://www.transparency.org/what-is-corruption, viewed in November 2024.

119 Transparency International (n.d.), "Corruption Perceptions Index", online https://www.transparency.org/en/cpi/2020/index/nzl, viewed in November 2024.

120 The World Bank (2011), Ill-gotten Money and the Economy – Experiences from Malawi and Namibia, Washington DC, the United States: The World Bank;

The World Bank (2017), World Development Report 2017: Governance and the Law, Washington DC, the United States: The World Bank.

121 Transparency International (n.d.), "What is corruption?", online: https://www.transparency.org/what-is-corruption, viewed in November 2024;

Global Witness (2015, October), Banks and Dirty Money: how the financial system enables state looting at a devastating human cost, London, United Kingdom: Global Witness.

122 Bakowski, P. (2022, December), "Combating corruption in the European Union", EPRS | European Parliamentary Research Service.

123 Transparency International (2015, April), Lobbying in Europe: Hidden Influence, Privileged Access, Berlin, Germany: Transparency International.

124 United Nations (n.d.), "Sustainable Development Goal 16", online: https://sdgs.un.org/goals/goal16, viewed in November 2024.

125 United Nations (n.d.), "Sustainable Development Goal 10", online: https://sdgs.un.org/goals/goal10, viewed in November 2024.

126 FATF (2023, November 16), "Amendments to the FATF Standards to Strengthen Global Asset Recovery", online: https://www.fatf-gafi.org/en/publications/Fatfrecommendations/amendment-FATF-standards-global-asset-recovery.html, viewed in December 2024.

127 Council of the European union (2024, May 31), "Anti-money laundering: Council adopts package of rules", online: https://www.consilium.europa.eu/en/press/press-releases/2024/05/30/anti-money-laundering-council-adopts-package-of-rules/, viewed in November 2024.

128 Stolen Asset Recovery Initiative (2011), The Puppet Masters: How the Corrupt Use Legal Structures to Hide Stolen Assets and What to Do About It, Washington DC, the United States: World Bank and UNODC.

129 UNDODC (n.d.), "Signature and Ratification Status", online: https://www.unodc.org/unodc/en/corruption/ratification-status.html, viewed in November 2024.

130 OECD (n.d.), "OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions", online: http://www.oecd.org/corruption/oecdantibriberyconvention.htm, viewed in November 2024.

131 Transparency International (2013), Business Principles for Countering Bribery: A Multi-Stakeholder Initiative led by Transparency International, Berlin, Germany: Transparency International.

132 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO, p. 6.

133 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO, p. 72.

134 UN Committee on the Elimination of Discrimination against Women (2010), General Recommendation N. 28 The Code Obligations of States Parties under Article 2 of the Convention, CEDAW/C/CG/28, para 5, New York, the United States: United Nations, p.31.

135 UN WOMEN (2017) "The UN WOMEN Gender and Economics Training Manual", New York, the United States: United Nations.

136 SDG Action (2023, March 6), "Poverty is not gender neutral", online: https://sdg-action.org/poverty-is-not-gender-neutral/, viewed in December 2024.

137 Demirgüç-Kunt, A., L. Klapper, D. Singer, and S. Ansar (2022), The Global Findex Database 2021: Financial Inclusion, Digital Payments, and Resilience in the Age of COVID-19, Washington, DC, the United States: World Bank.

138 World Bank (2024), Women, Business and the Law 2024, Washington D.C., the United States: World Bank.

139 UN WOMEN (2019), Progress Of the World's Women 2019–2020; Families in a Changing World, New York, the United States: United Nations.

140 WHO (2024, March 25), "Fact Sheet – Violence against women", online: https://www.who.int/news-room/fact-sheets/detail/violence-against-women, viewed in December 2024.

141 UN WOMEN (2023, November 24), "Facts and figures: Ending violence against women", online: https://eca.unwomen.org/en/stories/explainer/2023/12/facts-and-figures-ending-violence-against-women, viewed in December 2024.

142 Equileap (2021), Gender Equality Global Report & Ranking: 2021 Edition, Amsterdam, The Netherlands: Equileap

143 Demirgüç-Kunt, A., L. Klapper, D. Singer, and S. Ansar (2022), The Global Findex Database 2021: Financial Inclusion, Digital Payments, and Resilience in the Age of COVID-19, Washington, DC, the United States: World Bank.

144 UN WOMEN (2017), The UN WOMEN Gender and Economics Training Manual, New York, the United States: United Nations;

Equileap (2019), Gender Equality Global Report & Ranking: 2019 Edition, Amsterdam, The Netherlands: Equileap.

145 Business & Human Rights Resource Centre (n.d.) "Gender, Business & Human Rights", online: https://www.business-humanrights.org/en/big-issues/gender-business-human-rights/, viewed in December 2024;

UNDP and the United Nations Working Group on Business and Human Rights (2019), *Gender Dimensions of the Guiding Principles on Business and Human Rights,* New York, the United States: UNDP

146 Dovey, K. et al (n.d.), "Submission to the UN Working Group on Human Rights and Transnational Corporations and other Business Enterprises", The Gender, Business and Human Rights Reference Group, online: https://www.ohchr.org/Documents/Issues/TransCorporations/Submissions/MultiStakeholder/GenderBusinessAndHumanRightsReferenceGroup.pdf, viewed in December 2024.

147 European Institute for Gender Equality (n.d.), "What is gender mainstreaming?", online: https://eige.europa.eu/gender-mainstreaming/what-is-gender-mainstreaming?language_content_entity=en, viewed in December 2024.

148 UN WOMEN (n.d.), "Intergovernmental mandates on gender mainstreaming", online: www.un.org/womenwatch/osagi/intergovernmentalmandates.htm, viewed in December 2024.

149 United Nations (n.d.), "Sustainable Development Goal 5", online: https://sdgs.un.org/goals/goal5, viewed in December 2024.

150 United Nations (n.d.), "Sustainable Development Goal 10", online: https://sdgs.un.org/goals/goal10, viewed in December 2024.

151 United Nations (n.d.), "Sustainable Development Goal 1", online: https://sdgs.un.org/goals/goal1, viewed in December 2024.

152 United Nations (n.d.), "Sustainable Development Goal 4", online: https://sdgs.un.org/goals/goal4, viewed in December 2024.

153 United Nations (n.d.), "Sustainable Development Goal 8", online: https://sdgs.un.org/goals/goal8, viewed in December 2024.

154 Laplane, J., E. Casajuana, S. Geurts and W. Warmerdam (2022, March), *How banks turn a blind eye to gender inequality in their business relationships - An update study for the Fair Bank Guide Netherlands*, Amsterdam, The Netherlands: Profundo.

155 Equileap (n.d.), "Equileap reports", online: https://equileap.com/equileap-reports/, viewed in December 2024.

156 Mallidis, I., G. Giannarakis, and N. Sariannidis (2024, March 10), "Impact of board gender diversity on environmental, social, and ESG controversies performance: The moderating role of United Nations Global Compact and ISO", *Journal of Cleaner Production*, 444.

157 UN Office of the High Commissioner for Human Rights (OHCHR) (n.d), "OHCHR and Women's Human Rights and Gender Equality", online: https://www.ohchr.org/en/women, viewed in December 2024.

158 United Nations (1948, December), Universal Declaration of Human Rights, United Nations General Assembly resolution 217 A (III), article 23, New York, the United States: United Nations.

159 United Nations (1948, December), Universal Declaration of Human Rights, United Nations General Assembly resolution 217 A (III), article 23, New York, the United States: United Nations.

160 UN WOMEN (1979), "Convention on the Elimination of All Forms of Discrimination against Women", online: https://www.un.org/womenwatch/daw/cedaw/ viewed in December 2024.

161 UN Committee on the Elimination of Discrimination against Women (2010), General Recommendation N. 28 The Code Obligations of States Parties under Article 2 of the Convention, CEDAW/C/CG/28, para 9, New York, the United States: United Nations.

162 UN Committee on the Elimination of Discrimination against Women (2010), General Recommendation N. 28 The Code Obligations of States Parties under Article 2 of the Convention, CEDAW/C/CG/28, para 10, New York, the United States: United Nations.

163 UN Committee on the Elimination of Discrimination against Women (2010), General Recommendation N. 28 The Code Obligations of States Parties under Article 2 of the Convention, CEDAW/C/CG/28, para 24, New York, the United States: United Nations.

164 UN Committee on the Elimination of Discrimination against Women (2010), General Recommendation N. 28 The Code Obligations of States Parties under Article 2 of the Convention, CEDAW/C/CG/28, para 25, New York, the United States: United Nations.

165 UN Committee on the Elimination of Discrimination against Women (2010), General Recommendation N. 28 The Code Obligations of States Parties under Article 2 of the Convention, CEDAW/C/CG/28, para 25, New York, the United States: United Nations.

166 UN Committee on the Elimination of Discrimination against Women (1992), General Recommendation N. 19 Violence against women, CEDAW/C/CG/19, para 4, New York, the United States: United Nations.

167 UN Office of the United Nations High Commissioner for Human Rights (2007, September), Special Procedures of the United Nations Human Rights Council, State Responsibilities to Regulate and Adjudicate Corporate Activities under the United Nations' core Human Rights Treaties, Individual Report on the United Nations Convention on the Elimination of All Forms of Discrimination against Women, Report No. 4, Geneva, Switzerland: UN OHCHR, p. 41-42.

168 ILO (n.d.), "Gender equality", online: https://www.ilo.org/gender-equality, viewed in December 2024.

169 Gender, Equality and Diversitay Branch – Conditions of Work and Equality Department (2015), Pay Equity. A key driver of gender equality,Geneva, Switzerland: International Labour Office;

Gender, Equality and Diversitay Branch – Conditions of Work and Equality Department (2015), "Women on Boards. Building the female talent pipeline", Geneva, Switzerland: International Labour Office.

170 International Labour Organisation (2023, March), Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy, Sixth edition 2022, Geneva, Switzerland: International Labour Office, p. 13.

171 International Labour Organisation (2023, March), Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy, Sixth edition 2022, Geneva, Switzerland: International Labour Office, p. 13.

172 Ruggie, J. (2011), Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework, New York, the United States: United Nations Human Rights Council, A/HRC/17/31, Preamble.

173 Ruggie, J. (2011), Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework, New York, the United States: United Nations Human Rights Council, A/HRC/17/31, Preamble.

174 Dovey, K. et al (n.d.), Submission to the UN Working Group on Human Rights and Transnational Corporations and other Business Enterprises, The Gender, Business and Human Rights Reference Group.

175 Dovey, K. et al (n.d.), Submission to the UN Working Group on Human Rights and Transnational Corporations and other Business Enterprises, The Gender, Business and Human Rights Reference Group, p. 1.

176 United Nations Working Group on the issue of human rights and transnational corporations and other business enterprises (2019, May 23rd), Gender Dimensions of the Guiding Principles on Business and Human Rights, New York City, the United States: United Nations Human Rights Council, pp. 63.

177 UN Women (2015), *Beijing Declaration and Platform for Action, Beijing +5 Political Declaration and Outcome*, New York, the United States: UN Women.

178 UN Women (2015), *Beijing Declaration and Platform for Action, Beijing +5 Political Declaration and Outcome*, New York, the United States: UN Women.

179 European Commission (n.d.), "EU action to promote gender balance in decision-making", online: https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/gender-equality/equality-between-women-and-men-decision-making/eu-action-promote-gender-balance-decision-making_en, viewed in December 2024.

180 OECD (2023), OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, Paris, France: OECD Publishing, p. 31.

181 OECD (2023), OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, Paris, France: OECD Publishing, p. 26.

182 OECD (2023), OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, Paris, France: OECD Publishing, p. 19.

183 IFC (2012, January 1), Performance Standard 2: Labor and Working Conditions, Washington DC, the United States: International Finance Corporation, p. 3.

184 IFC (2012, January 1), Performance Standard 2: Labor and Working Conditions, Washington DC, the United States: International Finance Corporation, p. 3.

185 Women's Empowerment Principles (n.d.), "About", online: https://www.weps.org/about, viewed in December 2024.

186 United Nations (2008, March), UN Declaration on the Rights of Indigenous Peoples, New York, the United States: United Nations, Articles 21, 22 .

187 Equileap (2017), Gender Equality Global Report & Ranking, Amsterdam: The Netherlands, Equileap.

Equileap (2018), Gender Equality Global Report & Ranking: 2018 Edition, Amsterdam, The Netherlands: Equileap.

Equileap (2019), Gender Equality Global Report & Ranking: 2019 Edition, Amsterdam, The Netherlands: Equileap.

188 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO, p. 6.

189 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO, p. 72.

190 Ruggie, J. (2011), Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework, New York, the United States: United Nations Human Rights Council, A/HRC/17/31, Guiding Principle 13;

OECD (2014, June 26-27), Due diligence in the financial sector: adverse impacts directly linked to financial sector operations, products or services by a business relationship. Paris, France: OECD, Working Paper of the Global Forum on Responsible Business Conduct.

191 United Nations (1948, December), Universal Declaration of Human Rights, United Nations General Assembly resolution 217 A (III), article 23, New York, the United States: United Nations.

192 UN (1979, December 18), "Convention on the Elimination of All Forms of Discrimination against Women", online: https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-elimination-all-forms-discrimination-against-women , viewed in November 2024.

UN (1989, November 20), "Convention on the Rights of the Child", online: https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child , viewed in November 2024.

193 IDSN (2015), International Convention on the Elimination of All Forms of Racial Discrimination Recommendations and Comments on Caste-based Discrimination, Copenhagen, Denmark: International Dalit Solidarity Network.

194 Amnesty International (n.d.), "Corporations", online: https://www.amnesty.org/en/what-we-do/corporate-accountability/ , viewed in November 2024.

195 The Washington Post (2019, June 5), ''Cocoa's child laborers'', online: https://www.washingtonpost.com/graphics/2019/business/hershey-nestle-mars-chocolate-child-labor-west-africa/ , viewed in December 2024.

196 Windfuhr, Michael (2017, July), Analysis: Safeguarding Human Rights in Land Related Investments: Comparison of the Voluntary Guidelines Land with the IFC Performance Standards and the World Bank Environmental and Social Safeguard Framework, Berlin, Germany: German Institute for Human Rights.

197 Amnesty International (2024, April), The state of the world's human rights, London, the United Kingdom: Amesty International.

198 Front Line Defenders (2024, May), Global analysis 2023/2024, Front Line: the International Foundation for the Protection of Human Rights Defenders.

199 Ibid

200 Global Witness (2023, September), Standing Firm: the Land and Environmental Defenders On the Frontlines of the Climate Crisis, London, the United Kingdom: Global Witness.

201 United Nations General Assembly (2024, July 9), Report of the Special Rapporteur on the situation of human rights defenders, A/74/123, New York City, United States: United Nations.

202 Human Rights Watch (2024, November 14), ''Israel's Crimes Against Humanity in Gaza: Mass Forced Displacement and Widespread Destruction'', online: https://www.hrw.org/news/2024/11/14/israels-crimes-against-humanity-gaza, viewed in December 2024.

203 Ruggie, J. (2011), Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework, New York, the United States: United Nations Human Rights Council, A/HRC/17/31, Para 6, p. 4.

204 United Nations Office of the High Commissioner of Human Rights, (n.d.), "Business and human rights", online: https://www.ohchr.org/en/business-and-human-rights, November 2022.

205 OECD (n.d.), "Responsible business conduct in the financial sector,", online https://mneguidelines.oecd.org/rbc-financial-sector.htm , viewed in November 2022.

UNEP FI (n.d.), "Human rights and the finance sector", online: www.unepfi.org/humanrightstoolkit/finance.php, Viewed in November 2022.

206 United Nations Office of the High Commissioner of Human Rights (n.d.), "Open-ended intergovernmental working group on transnational corporations and other business enterprises with respect to human rights", online: https://www.ohchr.org/EN/HRBodies/HRC/WGTransCorp/Pages/IGWGOnTNC.aspx, viewed in November 2022.

207 United Nations Office of the High Commissioner of Human Rights (n.d.), "Open-ended intergovernmental working group on transnational corporations and other business enterprises with respect to human rights'', online: https://www.ohchr.org/en/hr-bodies/hrc/wg-trans-corp/session10 viewed in November 2024.

208 Council of the European Union (2024, May 24), '' Corporate sustainability due diligence: Council gives its final approval'', online: https://www.consilium.europa.eu/en/press/press-releases/2024/05/24/corporate-sustainability-due-diligence-council-gives-its-final-approval/ , viewed in December 2024.

209 BSR (2024, September 4), ''The CSDDD: Implications for the Finance Industry'', online: https://www.bsr.org/en/blog/the-csddd-implications-for-the-finance-industry , viewed in December 2024.

210 United Nations (n.d.), "Sustainable Development Goals", online: https://sdgs.un.org/goals , viewed in November 2024.

211 United Nations (n.d.), "Goal 8", online: https://sdgs.un.org/goals/goal8 , viewed in November 2024.

212 The Principles for Responsible Investment (2021), "*Why and how investors should act on human rights*'' online: https://www.unpri.org/download?ac=11953, viewed in January 2025.

213 The Principles for Responsible Investment (2023, May), PRI Reporting Guidance on Human Rights.

214 Platform on Sustainable Finance (2022, February), ''Final Report on Social Taxonomy'', online: https://ec.europa.eu/info/sites/default/files/business_economy_euro/banking_and_finance/documents/280222-sustainable-finance-platform-finance-report-social-taxonomy.pdf , viewed in December 2024.

215 European Commission (2021, 12 July), ''Draft proposal for a social taxonomy'', online: https://ec.europa.eu/info/publications/210712-sustainable-finance-platform-draft-reports_en , viewed in November 2024.

216 Council of the European Union (2024, May 24), '' Corporate sustainability due diligence: Council gives its final approval'', online: https://www.consilium.europa.eu/en/press/press-releases/2024/05/24/corporate-sustainability-due-diligence-council-gives-its-final-approval/ , viewed in December 2024.

217 BSR (2024, September 4), ''The CSDDD: Implications for the Finance Industry'', online: https://www.bsr.org/en/blog/the-csddd-implications-for-the-finance-industry , viewed in December 2024.

218 United Nations (1948, December), Universal Declaration of Human Rights, United Nations General Assembly resolution 217 A (III), article 23, New York, the United States: United Nations.

219 United Nations General Assembly (2002), General Comment No. 15. The right to water. UN Committee on Economic, Social and Cultural Rights, November 2002 Resolution A/RES/64/292, Geneva, Switzerland: United Nations General Assembly.

220 Committee on Economic, Social and Cultural Rights (2000), General Comment 14, The right to the highest attainable standard of health U.N. Doc. E/C.12/2000/4, Geneva, Switzerland: Committee on Economic, Social and Cultural Rights.

See for further on the topic of ESCR, Committee on Economic, Social and Cultural Rights (2017), General comment No. 24 on State obligations under the International Covenant on Economic, Social and Cultural Rights in the context of business activities, U.N. Doc. E/C.12/GC/24, Geneva, Switzerland: Committee on Economic, Social and Cultural Rights.

221 Ruggie, J. (2011), Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework, New York, the United States: United Nations Human Rights Council, A/HRC/17/31, p. 13.

222 United Nations (2011), Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework, New York, the United States: United Nations, HR/PUB/11/04, p. 21.

223 United Nations (2011), Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework, New York, the United States: United Nations, HR/PUB/11/04, p. 15.

224 UN Office of the High Commissioner of Human Rights (2017, June 12), OHCHR response to request from BankTrack for advice regarding the application of the UN Guiding Principles on Business and Human Rights in the context of the banking sector, Geneva, Switzerland: UN OHCHR;

Brightwell, R., Frijns, J. and A. Missbach (2017, December) How Banks Contribute to Human Rights Violations, Briefing Paper, Nijmegen, The Netherlands: BankTrack.

225 OECD (2023), *OECD Guidelines for Multinational Enterprises on Responsible Business Conduct*, p. 15, Paris, France: OECD Publishing.

226 OECD (2023), *OECD Guidelines for Multinational Enterprises on Responsible Business Conduct*, p. 19, Paris, France: OECD Publishing.

227 United Nations Human Rights Council (2008), Promotion and Protection of All Human Rights, Civil, Political, Economic, Social and Cultural Rights, Including the Right to Development, A/HRC/8/5, United Nations Human Rights Council, p. 26.

228 Ruggie, J. (2011), Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework, New York, the United States: United Nations Human Rights Council, A/HRC/17/31, p.31-35;

229 Amnesty International (2010), Haki Zetu. ESC rights in Practice. Land and Human Rights, Amsterdam, the Netherlands: Amnesty International Netherlands, p.10.

230 Equator Principles Association (2017, November 2), "EP Association Annual Meeting 2017 Outcomes", online: https://equator-principles.com/ep-association-news/ep-association-annual-meeting-2017-outcomes/, viewed in November 2022.

BankTrack (2022, November 10), "Tracking the Equator Principles", online: https://www.banktrack.org/page/tracking_the_equator_principles, viewed in January 2023

231 Amnesty International (2010), Haki Zetu. ESC rights in Practice. Land and Human Rights, Amsterdam, the Netherlands: Amnesty International Netherlands, p.26.

232 United Nations Human Rights Council (2013), Report of the Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, and on the right to non-discrimination in this context,

Raquel Rolnik; Mission to the World Bank 15th February 2013, A/HRC/2/46/Add.3, Para.16. Geneva, Switzerland: OHCHR.

233 UN Commission on Human Rights, Forced evictions, (1993, March) E/CN.4/RES/1993/77, para 6.

234 International Land Coalition (2011, May 27), Tirana Declaration, p. 2.

235 FAO (2014), Respecting Free, Prior and Informed Consent: Practical guidance for governments, companies, NGOs, indigenous peoples and local communities in relation to land acquisition, Rome, Italy: Food and Agriculture Organisation of the United Nations, p. 9.

Greenspan, E. (2014), "Free, Prior, and Informed Consent in Africa: An emerging industry standard for extractive industry projects", Oxfam America Research Backgrounder series, online: https://www.oxfamamerica.org/explore/research-publications/fpic-in-africa/, viewed in November 2022.

Roundtable on Sustainable Palm Oil (2016, January 21), "Free, Prior and Informed Consent Guide for RSPO Members (2015 endorsed)", online: https://rspo.org/news-and-events/announcements/free-prior-and-informed-consent-guide-for-rspo-members-2015-endorsed, viewed in November 2022.

236 UN Committee on the Elimination of Discrimination against Women (2016, March 4), General Recommendation No. 34 on the Rights of Rural Women, CEDAW/C/GC/34, New York City, United States: United Nations.

237 FAO (2012), Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security, Rome, Italy: Food and Agriculture Organisation of the United Nations.

238 Amnesty International (2010), Haki Zetu. ESC rights in Practice. Land and Human Rights, Amsterdam, the Netherlands: Amnesty International Netherlands, p.35.

239 United Nations (2007, September 13), Declaration on the Rights of Indigenous People, New York City, the United States: United Nations.

240 FAO (2012), Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security, Rome, Italy: Food and Agriculture Organisation of the United Nations, p. 14.

241 Inter-American Development Bank (2006), Operational Policy on Indigenous Peoples and Strategy for Indigenous Development, Washington DC, theUnited States of America: IADB.

242 OECD (2023), *OECD Guidelines for Multinational Enterprises on Responsible Business Conduct*, p. 17, 26, Paris, France: OECD Publishing.

243 United Nations (2006, 6 December), United Nations Convention on the Rights of Persons with Disabilities, p. 3: Article 1.

244 United Nations (n.d.), "Convention on the Rights of Persons with Disabilities (CRPD)", online: https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html, viewed in November 2022.

245 Don't Buy Into Occupation (2024, November), ''Don't Buy into Occupation IV report November 2024'', online: https://hwkvufmtfxjkrhbrfqkj.supabase.co/storage/v1/object/public/PUB/2024_DBIO-IV-report.pdf, viewed in December 2024.

246 OECD (2017), Responsible business conduct for institutional investors: Key considerations for due diligence under the OECD Guidelines for Multinational Enterprises

247 OECD (2019), Due Diligence for Responsible Corporate Lending and Securities Underwriting: Key considerations for banks implementing the OECD Guidelines for Multinational Enterprises

248 OECD (2022), Responsible Business Conduct Due Diligence for Project and Asset Finance Transactions, OECD Business and Finance Policy Papers, OECD Publishing, Paris, https://doi.org/10.1787/952805e9-en.

249 ISO (2010), ISO 26000:2010 Guidance on social responsibility, Geneva, Switzerland: ISO.

250 ISO (2010), ISO 26000:2010 Guidance on social responsibility, Geneva, Switzerland: ISO, p. 72.

251 ITUC (2024), *2024 ITUC GLOBAL RIGHTS INDEX THE WORLD'S WORST COUNTRIES FOR WORKERS*, Brussels, Belgium: IUTC, p. 7.

252 The World Bank (2012), World Development Report 2013: Jobs, Washington DC, United States,: The World Bank;

253 The World Bank (2011), World Development Report 2012: Gender Equality and Development, Washington D.C., United States: The World Bank.

254 United Nations Office for the High Commissioner on Human Rights (1979, December), Convention on the Elimination of All Forms of Discrimination agains Women, New York, United States: OHCHR.

255 United Nations (n.d.), “Sustainable Development Goal 5”, online: https://sdgs.un.org/goals/goal5, viewed in November 2024.

256 International Labour Organisation (2021), *ILO Global Estimates on International Migrant Workers*, Geneva, Switzerland: ILO, p. 4.

257 Levitt, T. (2024, November 5), “Revealed: hundreds of migrant workers dying of heat stress in Qatar each year”, The Guardian, online: https://www.theguardian.com/global-development/2024/nov/05/migrant-workers-exposed-deadly-45c-temperatures-gulf-human-rights-report, viewed in November 2024.

258 International Labour Organisation (2019), World Employment and Social Outlook: Trends 2019, Switzerland, Genève, ILO;

259 United Nations (n.d.), “Sustainable Development Goal 8”, online: https://sdgs.un.org/goals/goal8, viewed in November 2022.

260 ILO, OECD, IOM and UNICEF (2019), Ending child labour, forced labour and human trafficking in global supply chains, Geneva, Switzerland: International Labour Organisation, Organisation for Economic Co-operation and Development, International Organisation for Migration and United Nations Childrens Fund.

261 United Nations (n.d.), “Sustainable Development Goal 8”, online: https://sdgs.un.org/goals/goal8, viewed in November 2022.

262 United Nations (n.d.), “Sustainable Development Goal 10”, online: https://sdgs.un.org/goals/goal10, viewed in November 2022.

263 For a complete overview see the NORMLEX database, online: www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:1:0::NO:::, viewed in November 2022.

264 International Labour Organisation (n.d.), “Conventions and Recommendations”, online: https://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm, viewed in November 2022.

265 International Labour Organisation (1948), Freedom of Association and Protection of the Right to Organise Convention, Geneva, Switzerland: ILO;

International Labour Organisation (1949), Right to Organise and Collective Bargaining Convention, Geneva, Switzerland: ILO.

266 International Labour Organisation (1930), Forced Labour Convention, Geneva, Switzerland: ILO;

International Labour Organisation (1957), Abolition of Forced Labour Convention, Geneva, Switzerland: ILO.

267 International Labour Organisation (1973), Minimum Age Convention, Geneva, Switzerland: ILO;

International Labour Organisation (1999), Worst Forms of Child Labour Convention, Geneva, Switzerland: ILO.

268 International Labour Organisation (1958), Discrimination (Employment and Occupation) Convention, Geneva, Switzerland: ILO;

International Labour Organisation (1951), Equal Remuneration Convention, Geneva, Switzerland: ILO.

269 International Labour Organisation (1981), Occupational Safety and Health Convention, Geneva, Switzerland: ILO;

International Labour Organisation (2006), Promotional Framework for Occupational Safety and Health Convention, Geneva, Switzerland: ILO.

270 Narayan, P.K. (2015), An assessment of the Indian financial services sector, Geneva, Switzerland: ILO;

International Labour Organisation (2015), “Tripartite Workshop on Employment, Social Dialogue and Labour-Management Relations in the Financial Services Sector in Selected Countries in Asia and the Pacific”, online: www.ilo.org/jakarta/whatwedo/eventsandmeetings/WCMS_381561/lang--en/index.htm, viewed in November 2022.

271 International Labour Organisation (2017, March 17), “Press release: ILO revises its landmark Declaration on multinational enterprises”, online: http://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_547615/lang--en/index.htm, viewed in November 2022.

272 International Labour Organisation (2017, March), Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, Geneva, Switzerland: ILO.

273 International Labour Organisation (n.d.), “Fair Recruitment”, online: https://www.ilo.org/global/topics/fair-recruitment/lang--en/index.htm, viewed in November 2022.

274 International Labour Organisation (2019), General Principles and Operational Guidelines for Fair Recruitment & Definition of Recruitment Fees and Related Costs, Geneva, Switzerland: ILO.

275 International Labour Organisation (n.d), “ILO Thesaurus”, online: https://www.ilo.org/inform/online-information-resources/terminology/thesaurus/lang--en/index.htm , viewed in November 2022.

276 United Nations (1948, December), Universal Declaration of Human Rights, United Nations General Assembly resolution 217 A (III), article 23, New York, the United States: United Nations.

277 OECD (2011), OECD Guidelines for Multinational Enterprises, Paris, France: OECD Publishing.

278 Global Living Wage Coalition (n.d.), “What is a living wage?”, online: https://www.globallivingwage.org/about/what-is-a-living-wage/, viewed in November 2022.

279 ISO (2010), ISO 26000:2010 Guidance on social responsibility, Geneva, Switzerland: ISO.

280 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO, p. 6.

281 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO, p. 72.

282 UN (2011), Guiding Principles on Business and Human Rights. Implementing the United Nations “Protect, Respect and Remedy” Framework, Geneva, Switzerland: United Nations, p. 18.

283 IMF (2014), IMF Policy Paper Spillovers in International Corporate Taxation, Washington D.C., United States: International Monetary Fund.

284 ActionAid (2011), Addicted to tax havens: The secret life of the FTSE 100, London, the United Kingdom: ActionAid;

ActionAid (2013), How tax havens plunder the poor, London, the United Kingdom: ActionAid;

ICIJ (n.d.), “The Panama Papers: Politicians, Criminals and the Roques Industry That Hides Their Cash”, online: https://www.icij.org/investigations/panama-papers/, Viewed in December 2024;

ICIJ (nd.), “Paradise papers: Secrets of the global elite”, online: https://www.icij.org/investigations/paradise-papers/, Viewed in December 2024.

285 Eurodad (2014), Going Offshore. How development finance institutions support companies using the world’s most secretive financial centres, Eurodad;

UNCTAD Investment and Enterprise Division (2015, March), FDI, Tax and Development. The fiscal role of multinational enterprises: towards guidelines for Coherent International Tax and Investment Policies, UNCTAD.

286 Tax Justice Network (2024, November 19), “World losing half a trillion to tax abuse, largely due to 8 countries blocking UN tax reform, annual report finds”, online: https://taxjustice.net/press/world-losing-half-a-trillion-to-tax-abuse-largely-due-to-8-countries-blocking-un-tax-reform-annual-report-finds/

287 United Nations (n.d.), “Sustainable Development Goal 16”, online: https://sustainabledevelopment.un.org/sdg16, Viewed in December 2024.

288 United Nations (n.d.), “Sustainable Development Goal 17”, online: https://sustainabledevelopment.un.org/sdg17, Viewed in December 2024.

289 OECD (n.d.), “Committee on Fiscal Affairs releases outcome of review of preferential tax regimes in OECD countries”, online: http://www.oecd.org/tax/harmful/committeeonfiscalaffairsreleasesoutcomeofreviewofpreferentialtaxregimesinoecdcountries.htm, Viewed in December 2024;

OECD (2006), The OECD’s Project On Harmful Tax Practices: 2006 Update On Progress In Member Countries, Paris, France: OECD.

290 Tax Justice Network (n.d.), "What is a tax haven?", online: https://taxjustice.net/faq/what-is-a-tax-haven/. Viewed in December 2024.

291 OECD (n.d.), "About the Global Forum", online: http://www.oecd.org/tax/transparency/about-the-global-forum/, Viewed in December 2024.

292 Christian Aid (2015, February), Information for the Nations. How developing countries are being excluded from automatic information exchange, and how to change it,.

293 Chardonnet, A. and J. Langerock (2017, November), Blacklist or whitewash? What a real EU blacklist of tax havens should look like. United Kingdom, Oxfam GB for Oxfam International.

294 OECD (2024, January), "Economic Impact Assessment of the Global Minimum Tax: Summary", online: https://www.oecd.org/content/dam/oecd/en/topics/policy-issues/cross-border-and-international-tax/summary-economic-impact-assessment-global-minimum-tax-january-2024.pdf, viewed in December 2024.

295 OECD (n.d.), "Global Minimum Tax", online: https://www.oecd.org/en/topics/sub-issues/global-minimum-tax.html, Viewed in December 2024.

296 Isaac, A. (2022, November 23), "UN to vote on new tax convention proposed by African states - Developing nations hope draft resolution will pave way for fresh talks on global tax policy", The Guardian;

Global Alliance for Tax Justice (2022, November 23) "Press release: Governments Approve Proposal for International Tax Cooperation at United Nations".

297 Tax Justice Network (2024, November 27), "United Nations General Assembly votes overwhelmingly to begin historic, global tax overhaul", online: https://taxjustice.net/press/united-nations-general-assembly-votes-overwhelmingly-to-begin-historic-global-tax-overhaul/, Viewed in December 2024.

298 Boerrild, T, Kohonen, M. and R. Sarin (2015, November 17), Getting to Good – Towards Responsible Corporate Tax Behaviour, the United Kingdom: ActionAid UK / Christian Aid / Oxfam, p. 25.

299 OECD (2011), OECD Guidelines for Multinational Enterprises, OECD Publishing, p. 60.

300 Karananou, A and Guha, A. (2015), Engagement Guidance on Corporate Tax Responsibility: Why and how to engage with your investee companies, Paris, France: PRI Association, p. 7.

301 European Commission (2017, 21 June), "Transparency for intermediaries", online: https://ec.europa.eu/taxation_customs/business/company-tax/transparency-intermediaries_en, Viewed in December 2024.

302 FACT Coalition (2018, November), Muddled Markets: Investors Increasingly at Risk from Lack of Disclosures about Corporate Tax Practices, Washington DC, United States: The FACT Coalition, p. v.

303 FACT Coalition (2022, July 22), A Material Concern: The Investor Case for Public Country-By-Country Tax Reporting, Washington DC, United States: The FACT Coalition, p. v.

304 Boerrild, T, Kohonen, M. and R. Sarin (2015, November 17), Getting to Good – Towards Responsible Corporate Tax Behaviour, the United Kingdom: ActionAid UK / Christian Aid / Oxfam, p. 21.

305 OECD (n.d.), "About BEPS", online: http://www.oecd.org/tax/beps-about.htm, Viewed in December 2024.

306 European Union (2013, June 26), Directive 2013/36/EU of the European Parliament and of the Council, Official Journal of the European Union, Article 89.

307 Aubrey, M. and Dauphin, T. (2017, 27 March), The use of tax havens by Europe's biggest banks, Oxfam International.

308 GRI (2019), GRI 207: Tax 2019, Global Reporting Initiative, Amsterdam: the Netherlands, p. 12.

309 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO, p. 6.

310 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO, p. 72.

311 European Union (2023), "Attitudes of Europeans towards animal welfare", online: https://europa.eu/eurobarometer/surveys/detail/2996, viewed in December 2024.

312 FAO (n.d.), "Animal Production", online: https://www.fao.org/animal-production/en, Viewed in December 2024.

313 FAO (n.d.), "Animal health", online: https://www.fao.org/animal-health/en, Viewed in December 2024.

314 FAIRR Initiative (n.d.), "Intensive animal agriculture", online: https://www.fairr.org/news-events/insights/intensive-animal-agriculture, viewed in December 2024.

315 FAIRR (2019), "Factory Farming - Unveiling the Hidden Risks for Investors", online: https://www.fairr.org/news-events/insights/factory-farming-unveiling-the-hidden-risks-for-investors, viewed in December 2024.

316 RSPCA (n.d.), "Farm animal welfare", online: https://www.rspca.org.uk/adviceandwelfare/farm, viewed in December 2024.

317 Committee on Considerations for the Future of Animal Science Research (2015, March), Critical Role of Animal Science Research in Food Security and Sustainability, Washinton (DC), United States: National Academies Press, p. 24, 70-79;

Parente, S. and H. van de Weerd (2012, August), Food Security And Farm Animal Welfare, Surrey / London, United Kingdom: CIWF / WAP, p. 8.

318 EurActiv (2016), "CAP and animal welfare: Simply incompatible", online: www.euractiv.com/section/agriculture-food/opinion/cap-and-animal-welfare-simply-incompatible/, Viewed in December 2024.

319 Chandroo, K.P., Duncan, I.J.H., Moccia, R.D. (2004). "Can fish suffer?: Perspectives on sentience, pain, fear and stress", Applied Animal Behaviour Science, 86: 225–250;

Low, P. J. Panksepp et al (2012, July 7), The Cambridge Declaration on Consciousness, Cambridge, United Kingdom: University of Cambridge;

AVMA Panel on Euthanasia (2013), AVMA Guidelines for the Euthanasia of Animals: 2013 Edition, Schaumber, United States of America: American Veterinary Medical Association, p. 13.

320 RSPCA (n.d.), "Laboratory animals", online: https://www.rspca.org.uk/adviceandwelfare/laboratory, Viewed in December 2024.

321 World Animal Protection (2017), Checking out of cruelty. How to end wildlife tourism's holiday horrors, London, United Kingdom: World Animal Protection.

322 ISO (2010), ISO 26000: 2010 Guidance on social responsibility, Geneva, Switzerland: ISO.

323 Russell, W.M.S. and Burch, R.L., (1959), The Principles of Humane Experimental Technique, London, United Kingdom: Methuen;

UU (2015), "Verantwoord proefdieronderzoek", online: http://www.uu.nl/onderzoek/onderzoek-aan-de-uu/kwaliteit-en-integriteit/verantwoord-proefdieronderzoek, Viewed in December 2024.

324 European Commission (n.d.), "Animals in science", online: https://environment.ec.europa.eu/topics/chemicals/animals-science_en, Viewed in December 2024.

325 Fur Free Alliance (n.d.). "Fur Bans", online: https://www.furfreealliance.com/fur-bans/, viewed in December 2024.

326 FARMS initiative (2021, February), "Principles Underlying the Responsible Minimum Standards", online: https://www.farmsinitiative.org/_files/ugd/a0f227_c95fddaa99f94ce68ddea7e411a58e5d.pdf, Viewed in December 2024;

FARMS Initiative (n.d.), "PDFs of the RMS", online: https://www.farmsinitiative.org/rmspdfs, viewed in December 2024.

327 Axberg, J. D., Williams, N. R., and Weerd, H. (2024), *The Business Benchmark on Farm Animal Welfare Methodology Report 2023*, London, United Kingdom: BBFAW, p. 7.

328 FAIRR (2016), Factory Farming: Assessing Investment Risks: 2016 Report, p. 2, FAIRR.

329 European Commission (n.d.), "Revision of the animal welfare legislation", online: https://food.ec.europa.eu/animals/animal-welfare/evaluations-and-impact-assessment/revision-animal-welfare-legislation_en., viewed in December 2024.

330 European Commission (n.d.), "Revision of the animal welfare legislation", online: https://food.ec.europa.eu/animals/animal-welfare/evaluations-and-impact-assessment/revision-animal-welfare-legislation_en., viewed in December 2024.

331 European Commission (n.d.), "Calves", online: https://food.ec.europa.eu/animals/animal-welfare/eu-animal-welfare-legislation/animal-welfare-farm/calves_en, viewed in December 2024;

European Commission (n.d.), "Laying hens", online: https://food.ec.europa.eu/animals/animal-welfare/eu-animal-welfare-legislation/animal-welfare-farm/laying-hens_en, viewed in December 2024; and

European Commission (n.d.), "Pig welfare", online: https://food.ec.europa.eu/animals/animal-welfare/eu-animal-welfare-legislation/animal-welfare-farm/pigs_en, viewed in December 2024.

332 European Commission (n.d.), "Organic production and products", online: https://agriculture.ec.europa.eu/farming/organic-farming/organic-production-and-products_en, viewed in December 2024.

333 ASC (n.d.), "About ASC", online: https://asc-aqua.org/about-asc/, Viewed in December 2024.

334 WHO (2017, November 7), Stop using antibiotics in healthy animals to prevent the spread of antibiotic resistance.

335 McNamara, K. and K. Hamerschlag (2023, June), *Climate Misalignment: How Development Bank Investments In Industrial Livestock Are At Odds With Their Paris Agreement Commitments*, DC, United States: Friends of the Earth US.

336 RSPCA (n.d.), "Wild animals in circuses", online: https://www.rspca.org.uk/adviceandwelfare/wildlife/captivity/circuses, Viewed in December 2024;

RSPCA (n.d.), "Wild animals in captivity", online: https://www.rspca.org.uk/adviceandwelfare/wildlife/captivity, Viewed in December 2024.

337 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO, p. 6.

338 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO, p. 72.

339 Xu, K., A. Soucat, J. Kutzin et al (2018), Public Spending on Health: A Closer Look at Global Trends, Geneva, Switzerland: World Health Organisation.

340 World Health Organisation (2006), Constitution of the World Health Organisation. Basic Documents, Forty-Fifth edition, Supplement, Geneva: Switzerland: World Health Organisation..

341 UN General Assembly (1966, December 16), International Covenant on Economic, Social and Cultural Rights, Geneva, Switzerland: Office of the United Nations High Commissioner for Human Rights, Resolution 2200A (XXI), Article 12.

342 OHCHR and WHO (2008, June),The Right to Health. Fact Sheet No. 31, Geneva, Switzerland: Office of the United Nations High Commissioner for Human Rights / World Health Organisation.

343 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO.

344 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO.

345 ILO (n.d), "Safety and health at work", online: https://www.ilo.org/topics-and-sectors/safety-and-health-work, last viewed in November 2024.

346 WHO (2023, September), "Fact sheet – Drinking-water", online: https://www.who.int/en/news-room/fact-sheets/detail/drinking-water, viewed in November 2024.

347 WHO (n.d.), "Air pollution", online: https://www.who.int/health-topics/air-pollution#tab=tab_1, viewed in November 2024.

348 WHO (2021, October), "Climate change and health: Fact sheet Nr. 266", online:, https://www.who.int/en/news-room/fact-sheets/detail/climate-change-and-health, viewed in November 2024.

349 European Environment Agency (2013), A closer look at urban transport – TERM 2013: transport indicators tracking progress towards environmental targets in Europe, EEA Report No 11/2013, Luxembourg: Publications Office of the European Union.

350 Goodman, L.K. and K. Mulik (2015), Clearing the Air, Palm Oil, Peat Destruction and Air Pollution, Cambridge, the United States: Union of Concerned Scientists.

351 WWF International (n.d.), "Toxic Chemicals", online: http://wwf.panda.org/knowledge_hub/teacher_resources/webfieldtrips/toxics/, viewed in November 2024.

352 European Parliament (2016), Setting criteria on endocrine disruptors Follow-up to the General Court judgment, EPRS | European Parliamentary Research Service, p. 8;

Gore, A.C. et al. (2015), “EDC-2: The Endocrine Society’s Second Scientific Statement on Endocrine-Disrupting Chemicals”, Endocrine Reviews, 36(6):1-150.

WWF International (n.d.), “Endocrine Disrupting Chemicals. Problems with toxic: EDC’s. Wildlife and humans are exposed daily to these pervasive chemicals”, online: https://wwf.panda.org/discover/knowledge_hub/teacher_resources/webfieldtrips/toxics/our_chemical_world/edcs/, viewed in November 2024.

353 European Environment Agency (2023, May 25), “Briefing. Emerging chemical risks in Europe — ‘PFAS’”, online: https://www.eea.europa.eu/publications/emerging-chemical-risks-in-europe, viewed in November 2024.

354 ISO (2010), ISO 26000:2010 Guidance on social responsibility, Geneva, Switzerland: ISO.

355 Access to Medicine Foundation (2018, November), Access to Medicine Index 2018, Amsterdam, The Netherlands: Access to Medicine Foundation.

356 Access to Medicine Foundation (2018, November), Access to Medicine Index 2018, Amsterdam, The Netherlands: Access to Medicine Foundation.

357 United Nations (n.d.) “Sustainable Development Goal 3”, online: https://sdgs.un.org/goals/goal3, viewed in November 2024.

358 Access to Medicine Foundation (2018, November), Access to Medicine Index 2018, Amsterdam, The Netherlands: Access to Medicine Foundation.

359 WHO (2017, November), “Antimicrobial resistance”, online: https://www.who.int/en/news-room/fact-sheets/detail/antimicrobial-resistance/, viewed in November 2024.

360 ECDC (2017, July 17), Antimicrobial resistance and causes of non-prudent use of antibiotics in human medicine: results of the ARNA project;

Paget, J. et al (2017, April), Antimicrobial Resistance and causes of non-prudent use of antibiotics in human medicine in the EU, Luxembourg: Publications Office of the European Union.

361 ECDC (European Centre for Disease Prevention and Control), EFSA (EuropeanFood Safety Authority), and EMA (European Medicines Agency) (2017). “ECDC/EFSA/EMA second jointreport on the integrated analysis of the consumption of antimicrobial agents and occurrence ofantimicrobial resistance in bacteria from humans and food-producing animals–Joint InteragencyAntimicrobial Consumption and Resistance Analysis (JIACRA) Report”. EFSA Journal, 15(7):4872,135;

362 Global Antibiotic Research & Development Partnership (2024, November 1), “GARDP welcomes G20 recommendations on Antimicrobial Resistance”, online: https://gardp.org/gardp-welcomes-g20-recommendations-on-antimicrobial-resistance/, viewed in January 2025.

363 WHO (n.d.), “Breastfeeding”, online: https://www.who.int/nutrition/topics/exclusive_breastfeeding/en/, viewed in January 2025.

364 WHO (2023, Dec 20), “Infant and young child feeding”, online: https://www.who.int/en/news-room/fact-sheets/detail/infant-and-young-child-feeding, viewed in January 2025.

365 WHO (2015), WHO global report on trends in prevalence of tobacco smoking, Geneva, Switzerland: World Health Organisation, p. 1.

366 WHO (2023, July), “Tobacco: key facts”, online: https://www.who.int/news-room/fact-sheets/detail/tobacco, viewed in January 2025.

367 WHO (2023, July), “Tobacco: key facts”, online: https://www.who.int/news-room/fact-sheets/detail/tobacco, viewed in January 2025.

368 WHO (2019), WHO Report on the Global Tobacco Epidemic, 2019: Offer help to quit tobacco use, Geneva, Switzerland: World Health Organisation, p. 60.

369 United Nations (n.d.), “Sustainable Development Goal 3”, online: https://sdgs.un.org/goals/goal3 , viewed in January 2025.

370 United Nations (n.d.), “Sustainable Development Goal 6”, online: https://sdgs.un.org/goals/goal6, viewed in January 2025.

371 United Nations General Assembly (2022, July), Resolution A/76/L.75, ''The human right to a clean, healthy and sustainable environment'' online: https://digitallibrary.un.org/record/3982508?ln=en#record-files-collapse-header, viewed in January 2025.

372 Institute for Human Rights and Business (2011), More than a Resource: Water, Business and Human Rights, London, the United Kingdom, Institute for Human Rights and Business.

373 ILO (n.d.), "Safety and health at work", online: https://www.ilo.org/topics-and-sectors/safety-and-health-work, viewed in January 2025.

374 ILO (2008), Beyond deaths and injuries: The ILO's role in promoting safe and healthy jobs, Geneva, Switzerland: ILO.

375 Stockholm Convention (n.d.), "The new POPs under the Stockholm Convention", online http://chm.pops.int/TheConvention/ThePOPs/TheNewPOPs/tabid/2511/Default.aspx, viewed in January 2025.

376 Basel Convention (2019, September 13), "Entry into force of amendment to UN treaty boosts efforts to prevent waste dumping", online: http://www.basel.int/Default.aspx?tabid=8120, viewed in January 2025.

377 Bourguignon, D. (2015, December), The Precautionary Principle: Definitions, Applications and Governance, Brussels, Belgium: European Parliamentary Research Service.

378 Ethical Investment Research Services (2006), Beyond REACH – Chemical safety and sustainability concerns, London, the United Kingdom: Ethical Investment Research Services.

379 European Commission (n.d.), "Endocrine disruptors", online: https://health.ec.europa.eu/endocrine-disruptors/overview_en, viewed in January 2025.

380 Multinational Monitor (2004), "REACH and the long arm of the chemical industry", online: www.multinationalmonitor.org/mm2004/092004/digangi.html, viewed in January 2025.

381 ISO, (2010), ISO 26000:2010 Guidance on social responsibility, Geneva, Switzerland: ISO.

382 ISO, (2010), ISO 26000:2010 Guidance on social responsibility, Geneva, Switzerland: ISO, p. 43.

383 Access to Medicine Foundation (n.d.), "For investors", online: https://accesstomedicinefoundation.org/become-a-catalyst/for-investors, viewed in January 2025.

384 Access to Medicine Foundation (2022, November), Access to Medicine Index 2022, Amsterdam, The Netherlands: Access to Medicine Foundation.

385 WHO (2015), Global Action Plan on Antimicrobial Resistance, Rome, Italy: World Health Organisation.

386 Access to Nutrition Index (n.d.), "BMS/CF Marketing Index 2024", online: https://accesstonutrition.org/bmscf-indexes-2024/, viewed in January 2025.

387 WHO (2017), WHO report on the global tobacco epidemic, 2017: monitoring tobacco use and prevention policies, Geneva, Switzerland: World Health Organisation;

WHO (2019), WHO report on the global tobacco epidemic, 2019: Offer help to quit tobacco use, Geneva, Switzerland: World Health Organisation.

388 UN Global Compact (2017, July 19), "UNGC Board Meeting Report, 19 July 2017", online: https://www.unglobalcompact.org/docs/about_the_gc/UNGC-Board-Meeting_Report_07-19-17.pdf, viewed in January 2025.

389 NCD Alliance (NCDA), Framework Convention Alliance (FCA), Union for International Cancer Control (UICC), The International Union Against Tuberculosis and Lung Diseases (The Union), Vital Strategies, World Heart Federation (WHF) and Tobacco Free Kids (TFK) (2017, September 12), "Join Statement: UN Global Compact ban recognises the tobacco industry's incompatibility with responsible, sustainable business", online: https://www.uicc.org/sites/main/files/atoms/files/UNGCBansTobaccoIndustry_JointStatement_FINAL.pdf, viewed in January 2025.

390 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO, p. 6.

391 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO, p. 72.

392 OECD (2023), OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, OECD Publishing, Paris, https://doi.org/10.1787/81f92357-en.

393 OECD (2018), OECD Due Diligence Guidance for Responsible Business Conduct

394 IFC (n.d.), “Projects - Disclosed Projects”, online: https://disclosures.ifc.org/#/landing/, Viewed in November 2022;

EBA (n.d.), "2019 EU-wide transparency exercise", online: https://eba.europa.eu/risk-analysis-and-data/eu-wide-transparency-exercise, Viewed in November 2022.

395 Triodos Bank (n.d.), ‘’Know where you money goes’’, online: https://www.triodos.co.uk/know-where-your-money-goes , viewed in December 2024.

396 United Nations (n.d.), “Sustainable Development Goal 16”, online: https://sdgs.un.org/goals/goal16 , Viewed in November 2024.

397 United Nations (n.d.), “Sustainable Development Goal 12”, online: https://sdgs.un.org/goals/goal12 , Viewed in November 2024.

398 IFRS (2024. April 3), ‘’ Progress towards adoption of ISSB Standards as jurisdictions consult’’, online: https://www.ifrs.org/news-and-events/news/2024/04/progress-towards-adoption-of-issb-standards-as-jurisdictions-consult/, viewed in December 2024.

399 Eurostat (n.d.), "Glossary: Statistical classification of economic activities in the European Community (NACE)", online: ec.europa.eu/eurostat/statistics-explained/index.php/Glossary:Statistical_classification_of_economic_activities_in_the_European_Community_(NACE), last updated: 24 February 2016, Viewed in November 2022.

400 EBA (n.d.), "2019 EU-wide transparency exercise", online: https://eba.europa.eu/risk-analysis-and-data/eu-wide-transparency-exercise, Viewed in November 2022.

401 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO.

402 GRI (2021, September), A Short Introduction to the GRI Standards, Amsterdam: the Netherlands.

403 GRI (n.d), ‘’Double materiality. The guiding principle for sustainability reporting’’, online: https://www.globalreporting.org/media/rz1jf4bz/gri-double-materiality-final.pdf

404 GRI (2013), G4 Financial Services Sector Disclosures, Amsterdam: the Netherlands.

405 OECD (2017), Responsible business conduct for institutional investors: Key considerations for due diligence under the OECD Guidelines for Multinational Enterprises, p. 43.

406 OECD (2019), Due Diligence for Responsible Corporate Lending and Securities Underwriting: Key considerations for banks implementing the OECD Guidelines for Multinational Enterprises, p.21.

407 Ibid.

408 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO.

409 OECD (2023), OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, OECD Publishing, Paris, https://doi.org/10.1787/81f92357-en p. 20

410 BankTrack (2006), The Do’s and Don’ts of Sustainable Banking, The Netherlands, Nijmegen: BankTrack;

UNEP FI (2011), UNEP FI Guide to Banking and Sustainability, Geneva, Switzerland: The United Nations Environment Programme.

411 United Nations Principles for Responsible Investment (n.d.), “Investor reporting guidance”, online: https://www.unpri.org/signatories/reporting-and-assessment/investor-reporting-framework, viewed in November 2024.

412 United Nations Human Rights Council (2008), Promotion and Protection of All Human Rights, Civil, Political, Economic, Social and Cultural Rights, Including the Right to Development, A/HRC/8/5, United Nations Human Rights Council, p. 26.

413 UN OHCHR (2017, June 12), Office of the High Commissioner for Human Rights response to request from BankTrack for advice regarding the application of the UN Guiding Principles on Business and Human Rights in the context of the banking sector, Geneve, Switzerland: Office of the High Commissioner for Human Rights, p. 13-16.

414 Banktrack (2024, November), The BankTrack Global Human Rights Benchmark 2024, p.5.

415

OECD (n.d.), “National Contact Points for the OECD Guidelines for Multinational Enterprises “, online: https://mneguidelines.oecd.org/ncps/ , Viewed in November 2024.

416 Ruggie, J. (2011), Guiding Principles on Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Framework, New York, the United States: United Nations Human Rights Council, A/HRC/17/31, Preamble Guiding Principle 31.

417 Ruggie, J. (2011), Guiding Principles on Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Framework, New York, the United States: United Nations Human Rights Council, A/HRC/17/31, p. 33.

418 European Commission (2011, March), Proposal for a Directive of the European Parliament and of the Council on Credit Agreements relating to residential property, Brussels, Belgium: European Commission, p. 14.

419 Lefevre, A. and M. Chapman (2017), Behavioural economics and financial consumer protection - OECD Working Papers on Finance, Insurance and Private Pensions, Paris, France: OECD Publishing, p. 6-10;

P. Muller et al. (2014), Consumer Protection Aspects of Financial Services, Brussels, Belgium: European Parliament Directorate General For Internal Policies Policy Department A: Economic And Scientific Policy, p. 92-94.

420 OECD (2020), Financial Consumer Protection Policy Approaches in the Digital Age: Protecting consumers’ assets, data and privacy, p.6.

421 Demirgüç-Kunt, A., L. Klapper, D. Singer, and S. Ansar (2022), The Global Findex Database 2021: Financial Inclusion, Digital Payments, and Resilience in the Age of COVID-19, Measuring Financial Inclusion and the Fintech Revolution, Washington, DC, the United States: World Bank, p. 16.

S. Rutledge, N. Annamalai, Lester, R. and R. L. Symonds (2010, August), Good practices for consumer protection and financial literacy in Europe and Central Asia: a diagnostic tool; Washington, the United States: World Bank, p. ii.

422 Demirgüç-Kunt, A., L. Klapper, D. Singer, and S. Ansar (2022), The Global Findex Database 2021: Financial Inclusion, Digital Payments, and Resilience in the Age of COVID-19, Measuring Financial Inclusion and the Fintech Revolution, Washington, DC, the United States: World Bank, p. 21.

423 Consumer International (2024, February), Digital Finance, The Consumer Experience in 2024 p.6.

424 Consumers International (2011), Safe, fair and competitive markets in financial services: recommendations for the G20 on the enhancement of consumer protection in financial services, London, United Kingdom: Consumers International, p.5;

P. Muller et al. (2014), Consumer Protection Aspects of Financial Services, Brussels, Belgium: European Parliament Directorate General For Internal Policies Policy Department A: Economic And Scientific Policy, p. 18.

425 Consumers International (2011), Safe, fair and competitive markets in financial services: recommendations for the G20 on the enhancement of consumer protection in financial services, London, United Kingdom: Consumers International, p.8.

426 Consumers International (2011), Safe, fair and competitive markets in financial services: recommendations for the G20 on the enhancement of consumer protection in financial services London, United Kingdom: Consumers International, p.8;

P. Muller et al. (2014), Consumer Protection Aspects of Financial Services, Brussels, Belgium: European Parliament Directorate General For Internal Policies Policy Department A: Economic And Scientific Policy, p. 119.

427 OECD (n.d.), “Financial Consumer Protection”, online: www.oecd.org/g20/topics/financial-sector-reform/financialconsumerprotection.htm, Viewed in November 2022.

428 OECD (2011, October), https://www.oecd.org/content/dam/oecd/en/topics/policy-sub-issues/financial-consumer-protection/G20-OECD-FCP-Principles.pdf on Financial Consumer Protection, Paris, France: OECD

429 OECD, (2022), G20/OECD High-Level Principles on Financial Consumer Protection, online: https://www.oecd.org/content/dam/oecd/en/topics/policy-sub-issues/financial-consumer-protection/G20-OECD-FCP-Principles.pdf, viewed in December 2024..

430 OECD (2013, September), Update Report on the work to support the implementation of the G20 High-Level Principles on Financial Consumer Protection. G20/OECD Task Force On Financial Consumer Protection. Principles 4, 6 and 9, Paris, France: OECD, p.8.

431 OECD (2023), OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, OECD Publishing, Paris, https://doi.org/10.1787/81f92357-en. Chapter VIII

432 UNCTAD (2016), United Nations Guidelines For Consumer Protection - UNCTAD, Geneva, Switzerland: United Nations, p. 6.

433 UNCTAD (2016), United Nations Guidelines For Consumer Protection - UNCTAD, Geneva, Switzerland: United Nations, p. 21-22;

UNCTAD (n.d.), "United Nations Guidelines on Consumer Protection", online: unctad.org/en/Pages/DITC/CompetitionLaw/UN-Guidelines-on-Consumer-Protection.aspx, viewed in December 2022.

434 Council of the European Union (2023, October 9), ''Asking for a loan will be safer in the EU after the Council's final approval of the Consumer Credit Directive'', online: https://www.consilium.europa.eu/en/press/press-releases/2023/10/09/asking-for-a-loan-will-be-safer-in-the-eu-after-the-council-s-final-approval-of-the-consumer-credit-directive/, viewed in December 2024.

435 UNCTAD (2016), United Nations Guidelines For Consumer Protection - UNCTAD., Geneva, Switzerland: United Nations.

436 OECD (2011, October), G20 High-Level Principles on Financial Consumer Protection, Paris, France: OECD, p.7.

437 Hubbard-Solli, J. (2013, November), Responsible lending: An international landscape, London, United Kingdom: Consumers International, p.11.

438 OECD (2023), OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, OECD Publishing, Paris, https://doi.org/10.1787/81f92357-en. Chapter VIII

439 CGAP (2015), Digital Financial Inclusion, Washington DC, United States: CGAP;

Next Billion (2017), "The Longest Last Mile: Are India's Poor Ready for Digital Financial Services?", online: https://nextbillion.net/the-longest-last-mile-are-indias-poor-ready-for-digital-financial-services/, viewed in December 2022.

440 FSUG (2021, May), '' FSUG position paper on financial exclusion linked to broader accessibility issues'', online: https://finance.ec.europa.eu/system/files/2021-07/fsug-opinions-210712-broader-accessibility-issues_en.pdf, viewed in December 2024.

441 Word Economic Forum (2022, May 24), ''Bridging Southeast Asia's digital divide to drive financial inclusion'', online: https://www.weforum.org/stories/2022/05/bridging-southeast-asia-digital-divide-driving-financial-inclusion/, viewed in December 2024.

442 UN Department of Economic and Social Affairs (2003), United Nations Guidelines for Consumer Protection (as expanded in 1999), New York, United States: United Nations

443 OECD (2023), OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, OECD Publishing, Paris, https://doi.org/10.1787/81f92357-en. Chapter VIII

444 OECD (2011, October), G20 High-Level Principles on Financial Consumer Protection, Paris, France: OECD, p.7.

445 Liporace, T. (2020, March 5), "More indebted, Brazilian women increasingly assume leadership of their homes", *Consumers International,* online: https://www.consumersinternational.org/news-resources/blog/posts/more-indebted-brazilian-women-increasingly-assume-the-leadership-of-their-homes/, viewed in January 2023.

446 BusinessWorld (2024, October 22), ''High household debt raises bank asset risks in Southeast Asia'', online: https://www.bworldonline.com/top-stories/2024/10/22/629651/high-household-debt-raises-bank-asset-risks-in-southeast-asia/, viewed in December 2024.

447 OECD (2011, October), G20 High-Level Principles on Financial Consumer Protection, Paris, France: OECD, p.7.

448 European Parliament and European Council (2016, 27 April), Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, Article 21.

449 Demirgüç-Kunt, A., L. Klapper, D. Singer, and S. Ansar (2022), The Global Findex Database2021: Financial Inclusion, Digital Payments, and Resilience in the Age of COVID-19, , Washington, DC, the United States: World Bank, p. 33-34.

450 Demirgüç-Kunt, A., L. Klapper, D. Singer, S. Ansar and J. Hess (2018), The Global Findex Database 2017: Measuring Financial Inclusion and the Fintech Revolution, Washington, DC, the United States: World Bank, p. 4.

451 The World Bank (2022, March 29), Financial Inclusion. Financial inclusion is a key enabler to reducing poverty and boosting prosperity, online: https://www.worldbank.org/en/topic/financialinclusion/overview, viewed in December 2022

452 The World Bank (2018, October 1), "UFA2020 Overview: Universal Financial Access by 2020", online: www.worldbank.org/en/topic/financialinclusion/brief/achieving-universal-financial-access-by-2020, Viewed in November 2024.

453 The World Bank (2022, March 29), Financial Inclusion. Financial inclusion is a key enabler to reducing poverty and boosting prosperity, online: https://www.worldbank.org/en/topic/financialinclusion/overview#2, viewed in December 2024

454 Demirgüç-Kunt, A., L. Klapper, D. Singer, and S. Ansar (2022), The Global Findex Database 2021: Financial Inclusion, Digital Payments, and Resilience in the Age of COVID-19, Measuring Financial Inclusion and the Fintech Revolution, Washington, DC, the United States: World Bank, p. 21.

455 Center for Financial Inclusion (n.d.), "Mission&Vision", online: https://www.centerforfinancialinclusion.org/about/mission, Viewed in November 2022.

456 Ledgerwood, J., J. Earne and C. Nelson (2013), The New Microfinance Handbook. A Financial Market System Perspective, Washington D.C., United States: The World Bank, p. 17.

457 United Nations Department of Economic and Social Affairs (DESA) and the United Nations Capital Development Fund (UNCDF) (2006, May), Building Inclusive Financial Sectors for Development, New York, United States, p. 5.

458 Shastri, R.K. (2009), "Microfinance and Poverty Reduction in India: A Comparative Study with other Asian Countries", African Journal of Business Management, Vol. 3 No 4: 136-140, p. 139.

459 G20 Bali Leaders' Declaration Bali, Indonesia, 15-16 November 2022, p. 9-10

460 Pouchous, A. (2012, September), The Regulation and Supervision of Microfinance: Main issues and progress, Winnipeg, Canada: The International Institute for Sustainable Development.

461 UNEP Inquiry/Institute for Human Rights and Business (2016, February), Human Rights and Sustainable Finance. Exploring the Relationship, Geneva, Switzerland/London, United Kingdom, p. 8, 61.

462 United Nations (n.d.), "Sustainable Development Goal 1", online: https://sdgs.un.org/goals/goal1 , Viewed in November 2022.

463 United Nations (n.d.), "Sustainable Development Goal 5", online: https://sdgs.un.org/goals/goal5 , Viewed in November 2022.

464 United Nations (n.d.), "Sustainable Development Goal 8", online: https://sdgs.un.org/goals/goal8 , Viewed in November 2022.

465 United Nations (n.d.), "Sustainable Development Goal 9", online: https://sdgs.un.org/goals/goal9 , Viewed in November 2022.

466 United Nations (n.d.), "Sustainable Development Goal 10", online: https://sdgs.un.org/goals/goal10 , Viewed in November 2022.

467 Global Partnership for Financial Inclusion (2014, September 2), 2014 Financial Inclusion Action Plan, p. 2;

468 Consultative Group to Assist the Poor (CGAP) (n.d.), "Frequently Asked Questions about Financial Inclusion", online: www.cgap.org/about/faq, Viewed in November 2024.

469 Alliance for Financial Inclusion (2012, April), A Quick Guide to the Maya Declaration on Financial Inclusion, Kuala Lumpur, Malaysia: Alliance for Financial Inclusion.

470 United Nations Environment Programme Finance Initiative (2024, December 11), ''New guidance from UN Women and UNEP FI – Advancing Gender Equality and Women's Empowerment'', online: https://www.unepfi.org/industries/banking/new-guidance-on-advancing-gender-equality-and-womens-empowerment/ .

471 United Nations Environment Programme Finance Initiative (2024). Driving impact on Financial Health and Inclusion of Individuals and Businesses: From setting targets to implementation. Geneva p. 9.

472 Kolk, A. and Perego, P. (2014), “Sustainable Bonuses: Sign of Corporate Responsibility or Window Dressing?”, Journal of Business Ethics, 119(1), 1 – 15. DOI: doi=10.1007/s10551-012-1614-x

473 VOX CEPR’s Policy Portal (2012, January 12). “Bankers’ bonuses and the financial crisis”, online www.voxeu.org/article/bankers-bonuses-and-financial-crisis, Viewed in November 2022.

474 The Graduate Institute Geneva (2010), The Financial and Economic Crisis and Developing Countries, Switzerland: Geneva: the Graduate Institute Geneva.

475 Choudhury, A. (2017, 18 February), “Banker Bonuses”, Bloomberg, online: www.bloomberg.com/quicktake/banker-bonuses, Viewed in November 2022;

VOX CEPR’s Policy Portal (2012, January 12). “Bankers’ bonuses and the financial crisis”, online www.voxeu.org/article/bankers-bonuses-and-financial-crisis, Viewed in November 2022.

476 UN Global Compact and Accenture (2023), Reimagining the Agenda. Unlocking the Global Pathways to Resilience, Growth, and Sustainability for 2030, Accenture / UN Global Compact. p. 52.

477 United Nations (n.d.), “Sustainable Development Goal 10”, online: https://sustainabledevelopment.un.org/sdg10, Viewed in November 2022;

United Nations (n.d.), “Sustainable Development Goal 16”, online: https://sustainabledevelopment.un.org/sdg16, Viewed in November 2022.

478 Harvard Law School Forum on Corporate Governance and Financial Regulation (2011, June 9), “Clawbacks Under Dodd-Frank and Other Federal Statutes”, online: http://corpgov.law.harvard.edu/2011/06/09/clawbacks-under-dodd-frank-and-other-federal-statutes/, Viewed in November 2022.

479 Harvard Law School Forum on Corporate Governance and Financial Regulation (2013, August 18), “Remuneration Regulation in the European Financial Services Industry”, online: https://corpgov.law.harvard.edu/2013/08/18/remuneration-regulation-in-the-european-financial-services-industry/, viewed in November 2017.

480 Commission Delegated Regulation (EU) (2014, March), No 604/2014 supplementing Directive 2013/36/EU of the European Parliament and of the Council with regard to regulatory technical standards with respect to qualitative and appropriate quantitative criteria to identify categories of staff whose professional activities have a material impact on an institution's risk profile Text with EEA relevance. Online: http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2014.167.01.0030.01.ENG, Viewed in November 2022.

481 OECD (2023), OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, OECD Publishing, Paris, https://doi.org/10.1787/81f92357-en. p.21-22.

482 Harvard Law School Forum on Corporate Governance and Financial Regulation (2011, June 9), “Clawbacks Under Dodd-Frank and Other Federal Statutes”, online: http://corpgov.law.harvard.edu/2011/06/09/clawbacks-under-dodd-frank-and-other-federal-statutes/, Viewed in November 2022.

483 Harvard Law School Forum on Corporate Governance and Financial Regulation (2011, June 9), “Clawbacks Under Dodd-Frank and Other Federal Statutes”, online: http://corpgov.law.harvard.edu/2011/06/09/clawbacks-under-dodd-frank-and-other-federal-statutes/, Viewed in November 2022.

484 Fried, J. and Shilon, N. (2012), “The Dodd-Frank Clawback And The Problem Of Excess Pay”, The Corporate Board, January/February, p.1.

485 Harvard Law School Forum on Corporate Governance and Financial Regulation (2011, June 9), “Clawbacks Under Dodd-Frank and Other Federal Statutes”, online: http://corpgov.law.harvard.edu/2011/06/09/clawbacks-under-dodd-frank-and-other-federal-statutes/, Viewed in November 2022.

486 Harvard Law School Forum on Corporate Governance and Financial Regulation (2013, August 18), “Remuneration Regulation in the European Financial Services Industry”, online: https://corpgov.law.harvard.edu/2013/08/18/remuneration-regulation-in-the-european-financial-services-industry/, Viewed in November 2022.

European Banking Authority (2015, March 4), Consultation Paper. Draft Guidelines on Sound Remuneration Policies under Article 74(3) and 75(2) of Directive 2013/36/EU and disclosures under Article 450 of Regulation (EU) No 575/2013, London, the United Kingdom: European Banking Authority.

487 Norton Rose Fulbright (n/d), "United States", online: http://www.nortonrosefulbright.com/knowledge/technical-resources/banking-reform/remuneration-requirements-for-banks---a-global-analysis/united-states/, Viewed in November 2022.

488 Norton Rose Fulbright (n/d), "United States", online: http://www.nortonrosefulbright.com/knowledge/technical-resources/banking-reform/remuneration-requirements-for-banks---a-global-analysis/united-states/, Viewed in November 2022;

United States Department of the Treasury Federal Register(2010, June 25), Guidance on Sound Incentive Compensation Policies, – Notices, Vol. 75, No. 122, p. 36396,.

489 Harvard Law School Forum on Corporate Governance and Financial Regulation (2013, August 18), "Remuneration Regulation in the European Financial Services Industry", online: https://corpgov.law.harvard.edu/2013/08/18/remuneration-regulation-in-the-european-financial-services-industry/, Viewed in November 2022.

490 Ministerie van Financiën (2013, November), Consultatie Wet beloningsbeleid financiële ondernemingen. And: Staatsblad van het Koninkrijk der Nederlanden (2015), 45: Wet van 28 januari 2015 tot wijziging van de Wet op het financieel toezicht houdende regels met betrekking tot het beloningsbeleid van financiële ondernemingen (Wet beloningsbeleid financiële ondernemingen).

491 Ministerie van Financiën (2018), Evaluatie Wet Beloningsbeleid Financiële Ondernemingen, Den Haag, The Netherlands: Dutch Ministry of Finance.

492 United Kingdom Department for Business, Energy & Industrial Strategy (2019, 1 January), "New executive pay transparency measures come into force", online: https://www.gov.uk/government/news/new-executive-pay-transparency-measures-come-into-force, Viewed in November 2022.

493 World Economic Forum (2022), The Global Risks Report 2022: 17th Edition, Geneva, Switzerland: World Economic Forum, p. 16.

494 Oxfam International (2018, January), Reward work, not wealth., p. 10.

495 Oxfam International (2018, January), Reward work, not wealth., p. 56.

496 European Banking Authority (2021, July 21), Final Report on Guidelines on sound remuneration policies under Directive 2013/36/EU 1, p. 8.

497 Small Arms Survey (n.d.) "Global Firearms Holdings", online: https://www.smallarmssurvey.org/database/global-firearms-holdings, viewed in January 2025.

498 Curic, A. (2022, April 1), "Arms exports: A business without an EU policy", *Investigate Europe,* online: https://www.investigate-europe.eu/en/posts/arms-exports-a-business-without-an-eu-policy , viewed in January 2025.

Campaign Against Arms Trade (2022, 12 April), "Stop arming Saudi Arabia", online: https://caat.org.uk/homepage/stop-arming-saudi-arabia/, viewed in January 2025.

499 Tian, N., D. Lopes da Silva, X. Liang and L. Scarazzato (2024, April), Trends in World Military Expenditure, 2023, Sweden, Stockholm: Stockholm International Peace Research Institute.

500 Archer, C. and Willi, A. (2012), Opportunity Costs: Military Spending and the UN's Development Agenda: A View from the International Peace Bureau, Geneva, Switzerland: International Peace Bureau.

501 SIPRI (n.d.), "SIPRI Military Expenditure Database", online: http://www.sipri.org/research/armaments/milex/milex_database, viewed in January 2025.

502 Perlo-Freeman, S. (2016, 3 August), "Transparency and accountability in military spending", online: https://www.sipri.org/commentary/topical-backgrounder/2016/transparency-and-accountability-military-spending, viewed in January 2025;

Roeber, J. (2005), Parallel Markets: Corruption in the International Arms Trade, Goodwin Paper #3, London, the United Kingdom: CAAT;

Feinstein, A., P. Holden and B. Pace (2011), Corruption and the Arms Trade: Sins of Commission, SIPRI Yearbook 2011, Sweden, Stockholm: Stockholm International Peace Research Institute.

503 Feinstein, A., Holden, P. and Pace, B. (2011) "Corruption and arms trade: sins of commission" in SIPRI (eds.), SIPRI Yearbook 2011, Oxford, the United Kingdom: Oxford University Press, p. 13-37.

504 Shah, A. (2013), "The Arms Trade is Big Business", online: http://www.globalissues.org/article/74/the-arms-trade-is-big-business, viewed in January 2025.

505 UN Office of the High Commissioner for Human Rights (OHCHR) (2022, August), "Responsible business conduct in the arms sector: Ensuring business practice in line with the UN Guiding Principles on Business and Human Rights ", online: https://www.ohchr.org/sites/default/files/2022-08/BHR-Arms-sector-info-note.pdf, viewed in November 2024.

506 International Committee of the Red Cross (n.d.), "International humanitarian law and policy on Protected persons: Civilians", online: https://www.icrc.org/en/law-and-policy/protected-persons-civilians, viewed in January 2025.

507 Krutzsch, W., E. Myjer, R. Trapp (eds.) (2014, August), The Chemical Weapons Convention: A Commentary, Oxford Commentaries on International Law;

United Nations (2017, 7 July), UN Treaty on the Prohibition of Nuclear Weapons.

508 UN Office for Disarmament Affairs (n.d.), "The Convention on Certain Conventional Weapons", online: https://disarmament.unoda.org/the-convention-on-certain-conventional-weapons/, viewed in December 2024.

509 Cluster Munition Coalition (2010), CMC Policy Papers on the Convention on Cluster Munitions, London, the United Kingdom: Cluster Munition Coalition;

Cluster Munition Coalition (2013), Briefing Paper on the Convention on Cluster Munitions, London, the United Kingdom: Cluster Munition Coalition;

PAX (2017, 23 May), Worldwide Investments in Cluster Munitions: A Shared Responsibility, the Netherlands, Utrecht: PAX.

510 PAX (2017, 23 May), Worldwide Investments in Cluster Munitions: A Shared Responsibility, the Netherlands, Utrecht: PAX;

CMC (n.d.), "Stop Explosive Investments", online: www.stopexplosiveinvestments.org, last viewed January 2025.

511 Campaign to Stop Killer Robots (n.d.), "Problems with Autonomous Weapons", online: https://www.stopkillerrobots.org/stop-killer-robots/facts-about-autonomous-weapons/, viewed in January 2025.

512 Campaign to Stop Killer Robots (n.d.), "Problems with Autonomous Weapons", online: https://www.stopkillerrobots.org/stop-killer-robots/facts-about-autonomous-weapons/, viewed in January 2025.

513 United Nations for Disarmament Affairs (2013), The Impact of Poorly Regulated Arms Transfers on the Work of the United Nations: United Nations Coordinating Action on Small Arms 2013, UNODA Occasional Papers No. 23, New York, the United States: United Nations;

United Nations Development Program (2012, February 16), UN Officials Call for Comprehensive and Robust Arms Trade Treaty, New York, the United States: UNDP;

Oxfam International (n.d.), "Why we need a Global Arms Trade Treaty", online: http://www.oxfam.org/en/campaigns/conflict/controlarms/why-we-need-global-arms-trade-treaty, viewed in January 2025.

514 SIPRI (2012, November 20), "EU arms embargo on China", online: http://www.sipri.org/databases/embargoes/eu_arms_embargoes/china, viewed in January 2025.

515 SIPRI (2017, October 3), "EU arms embargo on Egypt", online: https://www.sipri.org/databases/embargoes/eu_arms_embargoes/egypt/eu-arms-embargo-on-egypt, viewed in January 2025.

516 SIPRI (2013), "Transfers of small arms and light weapons to fragile states: strengthening oversight and control", SIPRI Insights on Peace and Security, Solna, Sweden: SIPRI, No. 2013/1.

517 Arms Trade Treaty (n.d.), "Treaty Status", online: https://thearmstradetreaty.org/treaty-status.html?templateId=209883, viewed in January 2025.

518 Control Arms (n.d.), "About the Arms Trade Treaty (ATT)", online: https://controlarms.org/att/, viewed in November 2024;

Arms Trade Treaty (2014), "The Arms Trade Treaty", online: https://thearmstradetreaty.org/hyper-images/file/ATT_English/ATT_English.pdf?templateId=137253, viewed in January 2025.

519 Control Arms (2013), Summary Analysis of the Arms Trade Treaty, the United States, New York: Control Arms.

520 The Council Of The European Union (2008), Common Position 2008/944/CFSP of 8 December 2008 defining common rules governing control of exports of military technology and equipment, Brussels, Belgium: Official Journal of the European Union.

521 The Economist (2019), Democracy Index 2018: Me Too?, United Kingdom, London: The Economist.

522 United Nations (1948, December), Universal Declaration of Human Rights, United Nations General Assembly resolution 217 A (III), article 25, New York, the United States: United Nations.

523 UN Food and Agriculture Organisation (2005), Voluntary Guidelines to support the progressive realization of the right to adequate food in the context of national food security, Rome, Italy: FAO, p. 5.

524 Global Reporting Initiative (2014), Sustainability Reporting Guidelines & Food Processing Sector Supplement, Amsterdam, the Netherlands: Global Reporting Initiative.

525 European Commission (n.d.), "Biofuels", online: https://energy.ec.europa.eu/topics/renewable-energy/bioenergy/biofuels_en, viewed in January 2025.

526 ILO (n.d.), "Child labour in agriculture", online: https://www.ilo.org/international-programme-elimination-child-labour-ipec/sectors-and-topics/child-labour-agriculture, viewed in January 2025.

527 Asai, M. and J. Antón (2024), "Social issues in agriculture in rural areas", *OECD Food, Agriculture and Fisheries Papers*, No. 212, Paris, France: OECD Publishing.

528 Mills, E., (2017, April), Land Grabbing and Human Rights: The Role of EU Actors Abroad, Heidelberg, Gemany: FIAN International.

529 TNI (2013, February), The Global Land Grab. A primer. Amsterdam, The Netherlands: The Transnational 150uropean150 (TNI).

530 UNCCD (2017), Global Land Outlook: First edition, Bonn, Germany: United Nations Convention to Combat Desertification.

531 IPBES (2019), Summary for Policymakers of the Global Assessment Report on Biodiversity and Ecosystem Services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services, Bonn, Germany: Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services.

532 CIFOR (2015), "Clearing the smoke: The causes and consequences of Indonesia's fires", online: https://forestsnews.cifor.org/37016/clearing-the-smoke-the-causes-and-consequences-of-indonesias-fires?fnl=en, viewed in January 2025;

Rainforest Action Network (n.d.), "Responsible food", online: https://www.ran.org/responsible_food/, viewed in January 2025.

533 Our World in Data (2021, March 4), "If the world adopted a plant-based diet, we would reduce global agricultural land use from 4 to 1 billion hectares", online: https://ourworldindata.org/land-use-diets, viewed in January 2025.

534 NASA Earth Observatory (n.d.), "Sizing Up How Agriculture Connects to Deforestation", online: https://earthobservatory.nasa.gov/images/148674/sizing-up-how-agriculture-connects-to-deforestation, viewed January 2025;

Union of Concerned Scientists (2016, February 8), "What's Driving Deforestation?", online: https://www.ucsusa.org/resources/whats-driving-deforestation, viewed in January 2025.

535 Union of Concerned Scientists (2013), The Rise of Superweeds—and What to Do About It, Cambridge, the United States: Union of Concerned Scientists;

Profundo (2014), Soy Barometer 2014: A research report for the Dutch Soy Coalition, Amsterdam, the Netherlands: Profundo, p. 25-26.

536 IFC (2014), Good practice note: Improving animal welfare in livestock operations, online: https://www.ifc.org/en/insights-reports/2014/publications-gpn-animalwelfare-2014, viewed in January 2025.

537 RSPCA (n.d.), "Live transport of farm animals", online: https://www.rspca.org.uk/adviceandwelfare/farm/livetransport, viewed in January 2025;

Philips, C.J. (2016, October 6), "The welfare risk and impacts of heat stress on sheep shipped from Australia to the Middle East", Veterinary Journal, 218:78-85.

538 RSPCA (n.d.), “Farm Animal Slaughter”, online: https://www.rspca.org.uk/adviceandwelfare/farm/slaughter, viewed in January 2025.

539 ECDC (European Centre for Disease Prevention and Control), EFSA (European Food Safety Authority), and EMA (European Medicines Agency) (2017). “ECDC/EFSA/EMA second joint report on the integrated analysis of the consumption of antimicrobial agents and occurrence of antimicrobial resistance in bacteria from humans and food-producing animals–Joint Interagency Antimicrobial Consumption and Resistance Analysis (JIACRA) Report”. EFSA Journal, 15(7): p. 4872, 135.

540 WHO (2017, November 7), Stop using antibiotics in healthy animals to prevent the spread of antibiotic resistance.

541 IPCC (2014), Climate Change 2014: Impacts, Adaptation, and Vulnerability. Part A: Global and Sectoral Aspects. Contribution of Working Group II to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Field, C.B., V.R. Barros, D.J. Dokken, K.J. Mach, M.D. Mastrandrea, T.E. Bilir, M. Chatterjee, K.L. Ebi, Y.O. Estrada, R.C. Genova, B. Girma, E.S. Kissel, A.N. Levy, S. MacCracken, P.R. Mastrandrea, and L.L. White (eds.)], Cambridge, the United Kingdom and New York, the United States: Cambridge University Press, p. 1132;

Oxfam (2014), Standing on the sidelines. Why food and beverage companies must do more to tackle climate change, Oxford, the United Kingdom: Oxfam GB.

542 IPCC (2022), Climate Change 2022: Mitigation of Climate Change. Working Group III contribution to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change, Cambridge, United Kingdom and New York, the United States: Cambridge University Press, p. 8.

543 Goodman, L.K. and K. Mulik (2015), Clearing the Air, Palm Oil, Peat Destruction and Air Pollution, Cambridge the United States: Union of Concerned Scientists;

Turetsky, M. R., B. Benscoter, S. Page, G. Rein, G. R. van der Werf and A. Watts (2015), “Global vulnerability of peatlands to fire and carbon loss”, Nature Geoscience 8: p. 11-14;

International Peatland Society (2008), Peatlands and Climate Change – Executive Summary for Policymakers, Finland: International Peatland Society.

544 European Commission, (n.d.) “Biofuels”, online: https://energy.ec.europa.eu/topics/renewable-energy/bioenergy/biofuels_en, Viewed in January 2025.

545 European Commission, (n.d.) “Biofuels”, online: https://energy.ec.europa.eu/topics/renewable-energy/bioenergy/biofuels_en, Viewed in January 2025.;

Lapola, D. M., Schaldach, R., Alcamo, J., Bondeau, A., Koch, J., Koelking, C., & Priess, J. A. (2010), “Indirect land-use changes can overcome carbon savings from biofuels in Brazil.”, Proceedings of the National Academy of Sciences of the United States of America, 107(8), p. 3388–3393.

546 UN Food and Agriculture Organisation (2013), Tackling Climate Change Through Livestock – A global assessment of emissions and mitigation opportunities, Rome, Italy: FAO.

547 Oxfam (2014), Standing on the sidelines. Why food and beverage companies must do more to tackle climate change, Oxford, the United Kingdom: Oxfam GB.

548 DNV GL AS (2016), Global Opportunity Report 2016, Høvik, Oslo: DNV GL AS;

West, P. et al. (2014), “Leverage points for improving global food security and the environment”, Science, 345(6194), p. 325-328;

549 UN Food and Agriculture Organisation (n.d.), “Animal Production and Health”, online: https://www.fao.org/agriculture/animal-production-and-health/en/, viewed in January 2025;

UN Food and Agriculture Organisation (2013), Tackling Climate Change Through Livestock – A global assessment of emissions and mitigation opportunities, Rome, Italy: FAO;

Environment America Research and Policy Center (2016), America’s next top polluter – Company profile: Tyson Foods Inc., Washington D.C., the United States: Environment America Research and Policy Center.

550 World Trade Organisation (n.d.), “Export competition/subsidies”, online: www.wto.org/english/tratop_e/agric_e/ag_intro04_export_e.htm, Viewed in January 2025;

Bailey, R. (2011), Growing a Better Future: Food Justice in a Resource-Constrained World, Oxford, the United Kingdom: Oxfam GB.

551 FAO, IFAD, UNICEF, WFP and WHO (2022), The State of Food Security and Nutrition in the World 2022: Repurposing food and agricultural policies to make healthy diets more affordable, Rome, Italy: FAO, p. 10.

552 Murphy, S. and K. Hansen-Kuhn (2017), Counting the costs of agricultural dumping, Washington DC, the United States: Institute for Agriculture and Trade Policy.

553 The Guardian (2017, September 27), "Demand for biofuels is increasing global food prices, says study", online: www.theguardian.com/sustainable-business/2017/sep/20/demand-for-biofuels-is-increasing-global-food-prices-says-study, Viewed in January 2025;

Rullie, M.C, D. Bellomi, A. Cazzoli, G. De Carolis and P. D'Odorico (2016), The water-land-food nexus of first generation biofuels, Scientific Reports 6(22521), p. 1-10.

554 United Nations (n.d.), "Goal 2", online: https://sdgs.un.org/goals/goal2, Viewed in January 2025.

555 United Nations (n.d.), "Sustainable Development Goals", online: https://sdgs.un.org/goals, Viewed in January 2025.

556 FAO (2004), Voluntary Guidelines to support the progressive realization of the right to adequate food in the context of national food security, Rome, Italy.

557 WHO (2017, November 7), Stop using antibiotics in healthy animals to prevent the spread of antibiotic resistance.

558 The World Bank Group (2017), The Sunken Billions Revisited Progress and Challenges in Global Marine Fisheries, Washington DC. The United States: the World Bank Group, pp. 19-20;

Haenlein, C. (2017), Below the Surface How Illegal, Unreported and Unregulated Fishing Threatens our Security, London, the United Kingdom: RUSI.

559 International Transport Workers' Federation (n.d.), "Flags of convenience", online: https://www.itfglobal.org/en/sector/seafarers/flags-of-convenience, Viewed in January 2025.

560 United Nations (1990), UN General Assembly Resolution Nos. 44-225, 45-197, and 46-215, New York, the United States: UN;

European Parliament (2014), Initial Appraisal on the Prohibition on driftnet fisheries, Brussels, Belgium: European Parliament.

561 International Commission for the Conservation of Atlantic Tunas (ICCAT) (2004), Recommendation by ICCAT Concerning the Conservation of Sharks Caught in Association with Fisheries Managed by ICCAT, Madrid, Spain: ICCAT;

Inter-American Tropical Tuna Commission (2005), Resolution on the Conservation of Sharks Caught in Association with Fisheries in the Eastern Pacific Ocean, Res. C-05-03,.

562 MSC (2022, February1), MSC Draft Fisheries Standard is published for Public Review, online: https://www.msc.org/media-centre/news-opinion/news/2022/02/01/msc-new-draft-fisheries-standard-is-published-for-public-review, viewed in January 2025.

MSC (2017), The MSC at 20. Wild. Certified. Sustainable. Annual Report 2016 – 17, London, the United Kingdom: MSC.

563 ASC (n.d.), "About ASC", online: https://www.asc-aqua.org/about-us/about-the-asc/, Viewed in January 2025.

564 Greenpeace (n.d.), "The Amazon soya moratorium", online: https://www.greenpeace.org/archive-international/Global/international/code/2014/amazon/index.html, Viewed in January 2025.

565 Samora, R. (2019, November 5), "Brazil farmers push traders to end Amazon soy moratorium", Reuters, online: https://www.reuters.com/article/us-brazil-soybeans-moratorium-idUSKBN1XF2J6

566 Chain Reaction Research (2019, December 17), "Feed and Livestock in Brazil, China, EU Consume Most Cerrado Soy", online: https://www.profundo.nl/download/crr191217

567 Chain Reaction Research (2019, December 17), "Feed and Livestock in Brazil, China, EU Consume Most Cerrado Soy", online: https://chainreactionresearch.com/wp-content/uploads/2019/12/Feed-and-Livestock-in-Brazil-China-EU-Consume-Most-Cerrado-Soy-.pdf, viewed in January 2025.

568 RSPO (2018), Principles and Criteria for the Production of Sustainable Palm Oil 2018, Kuala Lumpur, Malaysia: Roundtable on Sustainable Palm Oil.

569 RSPO (2024, Nov 13), “RSPO Members Adopt the 2024 Principles and Criteria and Independent Smallholder Standard”, online: https://rspo.org/rspo-members-adopt-the-2024-principles-and-criteria-and-independent-smallholder-standard/, viewed in January 2025.

570 Wilmar International (2013), ”No Deforestation, No Peat, No Exploitation Policy”, online: http://www.wilmar-international.com/wp-content/uploads/2012/11/No-Deforestation-No-Peat-No-Exploitation-Policy.pdf, Viewed in January 2025;

571 GRI (2021, September), A Short Introduction to the GRI Standards, Amsterdam; the Netherlands.

572 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO, p. 6.

573 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO, p. 72.

574 UN (2011), Guiding Principles on Business and Human Rights. Implementing the United Nations “Protect, Respect and Remedy” Framework, Geneva, Switzerland: United Nations, p. 18.

575 OECD and FAO (2016, March), OECD-FAO Guidance for Responsible Agricultural Supply Chains, Rome, Italy: FAO and Paris, France: OECD, p. 3.

576 World Bank (n.d.), “Forest area (% of land area)”, online: https://data.worldbank.org/indicator/AG.LND.FRST.ZS, Viewed in December 2024.

577 Keenan, R. et al. (2015), “Dynamics of global forest area: Results from the FAO Global Forest Resources Assessment 2015”, Forest Ecology and Management, 352, p. 9-20;

FAO (2018), State of the World’s Forests 2018, Rome, Italy: FAO.

578 FAO (2018), State of the World’s Forests 2018, Rome, Italy: FAO, p. 11.

579 WWF International (n.d.), “Forest habitat”, online: www.worldwildlife.org/habitats/forest-habitat, Viewed in December 2024.

580 FAO (1997), People and forests in Asia and the Pacific: Situation and prospects, Bangkok, Thailand: Regional Community Forestry Training Centre and Rome, Italy: Forestry Policy and Planning Division.

581 WWF (n.d), “Forest habitat”, online: www.worldwildlife.org/habitats/forest-habitat, Viewed in December 2024.

582 Nature (2015, July 2), “The hunt for the world’s missing carbon”, online: www.nature.com/news/the-hunt-for-the-world-s-missing-carbon-1.17867, Viewed in December 2024.

583 IPCC (2022), Climate Change 2022: Mitigation of Climate Change. Working Group III contribution to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change, Cambridge, United Kingdom and New York, the United States: Cambridge University Press, p. 8.

584 UN Forum on Forests (2017, May 1), “Protection of forests ‘fundamental to security of humanity’s place on this planet,’ UN Forum told”, online: www.un.org/esa/forests/news/2017/05/protection-of-forests-fundamental-to-security-of-humanitys-place-on-this-planet-un-forum-told/index.html, Viewed in December 2024;

PEFC (n.d.), “Benefits of Forests”, online: https://www.pefc.org/what-we-do/why-forests-are-important/the-benefits-of-forests, Viewed in December 2024.

585 UNEP (2013), Green Economy and Trade – Trends, Challenges and Opportunities, Nairobi, Kenya: UNEP, p. 133.

586 FAO (2016), State of the World’s Forests 2016, Rome, Italy: FAO, pp. 72.

FAO (2015), The Global Forest Resources Assessment 2015, Rome, Italy: FAO.

587 United Nations Forum on Forests (2013), Background Paper 1: Economic Contributions of Forests, Istanbul, Turkey: United Nations;

FAO (2014), Contribution of the Forestry Sector to National Economies, 1990-2011, Rome, Italy: FAO, pp. 1-5.

588 FAO (2020), The Global Forest Resource Assessment Main Report, Rome, Italy: FAO, pp. XI.

589 FERN (2017), Tackling deforestation and forest degradation: a case for EU action in 2017, Brussels, Belgium: FERN;

Goodman, L.K. and K. Mulik (2015), Clearing the Air, Palm Oil, Peat Destruction and Air Pollution, Cambridge, the United States: Union of Concerned Scientists

590 UNEP (2017), Environmental Crime Tackling the Greatest Threats to our Planet, Nairobi, Kenya: UNEP, pp. 10-11. .

591 WWF (n.d.), “Deforestation”, online: www.worldwildlife.org/threats/deforestation, Viewed in December 2024.

592 Global Witness (2015), Exporting Impunity – How Congo’s Rainforest is illegally logged for international markets, London, the United Kingdom: Global Witness, pp. 6;

FERN (2015), Stolen Goods: The EU’s complicity in illegal tropical deforestation, Brussels, Belgium: FERN.

593 Roberts, J. et al (2014, March), The State of the Paper Industry. Monitoring the Indicators of Environmental Performance, Ashville, the United States: Environmental Paper Network;

Taylor, R. et al (2012, December), WWF Living Forests Report: Chapter 1. Forests for a Living Planet, Gland, Switzerland: WWF;

Taylor, R. et al (2012, December), WWF Living Forests Report: Chapter 4. Forests and Wood Products, Gland, Switzerland: WWF.

594 FAO (2021, November 6), “COP26: Agricultural expansion drives almost 90 percent of global deforestation”, online: https://www.fao.org/newsroom/detail/cop26-agricultural-expansion-drives-almost-90-percent-of-global-deforestation/en, viewed in December 2024.

595 CIFOR (2017), 5 Reasons stopping mangrove deforestation makes a whole lot of sense for climate change mitigation in indonesia, Bogor, Indonesia: CIFOR;

Scientific American (2016), “How Hunger for Shrimp and Slavery Destroy Mangroves”, online: www.scientificamerican.com/article/how-hunger-for-shrimp-and-slavery-destroy-mangroves-excerpt/, Viewed in December 2024.

596 WWF (n.d.), “Threats Infrastructure”, online: www.worldwildlife.org/threats/infrastructure, Viewed in December 2024.

597 United Nations (n.d.), “Goal 15”, online: https://sdgs.un.org/goals/goal15, viewed in November 2022.

598 United Nations (n.d.), “Sustainable Development Goals”, online: https://sustainabledevelopment.un.org/sdgs, Viewed in November 2022.

599 High Conservation Value Resource Network (2017, September), Common Guidance for the Identification of High Conservation Values – A good practice guide for identifying HCVs across different ecosystems and production systems, HCV Resource Network: online: https://hcvnetwork.org/wp-content/uploads/2018/03/HCVCommonGuide_English.pdf, Viewed in December 2024, p. 3.

600 High Conservation Value Resource Network (2017, September), Common Guidance for the Identification of High Conservation Values – A good practice guide for identifying HCVs across different ecosystems and production systems, HCV Resource Network: online: https://hcvnetwork.org/wp-content/uploads/2018/03/HCVCommonGuide_English.pdf, Viewed in December 2024.

601 EU FLEGT VPA Programme (n.d.), “The EU FLEGT VPA Programme aims to promote sustainable forest management and reduce illegal logging through supporting the implementation of VPAs”, online: https://www.eu-flegt-vpa-programme.com/en/home/, viewed in December 2024.

602 EU Commission (n.d.), “What does the law say?”, online: https://ec.europa.eu/environment/eutr2013/what-does-the-law-say/index_en.htm, Viewed in December 2024.

603 European Commission (2021, November 17), “Proposal for a regulation on deforestation-free products”, online: https://environment.ec.europa.eu/publications/proposal-regulation-deforestation-free-products_en, viewed in January 2023

604 European Council (2024, December 3), “Press release - EU deforestation law: Council and Parliament agree on its targeted amendment”, online: https://www.consilium.europa.eu/en/press/press-releases/2024/12/03/eu-deforestation-law-council-and-parliament-agree-on-its-targeted-amendment/

605 EPN (2014), Global Paper Vision, Ashville, the United States: Environmental Paper Network.

606 EPN (2014), Global Paper Vision, Ashville, the United States: Environmental Paper Network. p. 2.

607 Amnesty International (2010), Haki Zetu. ESC rights in Practice. Land and Human Rights, Amsterdam, the Netherlands: Amnesty International Netherlands, p.10.

608 Forest Stewardship council (2015, July 22), FSC Principles and Criteria for Forest Stewardship, Bonn, Germany: FSC.

609 Zwerts, J.A., Sterck, E.H.M., Verweij, P.A. et al. (2024, April), "FSC-certified forest management benefits large mammals compared to non-FSC", Nature 628, 563–568 (2024), online: https://doi.org/10.1038/s41586-024-07257-8, viewed in December 2024.

610 Programme for the Endorsement of Forest Certification (2018, November 28), Sustainable Forest Management – Requirements, Geneva, Switzerland: PEFC.

611 PEFC (n.d.), "About PEFC - Facts & Figures", online: https://www.pefc.org/discover-pefc/facts-and-figures, Viewed in December 2024.

612 Kusumaningtyas, R. (2019, July), Forest Certification and International Guidelines on the protection of Human and Labour Rights, Amsterdam, The Netherlands: Profundo.

613 World Wildlife Fund for Nature (2015, May 18), "WWF Forest Certification Assessment Tool (CAT)", online: https://wwf.panda.org/?246871/WWF-Forest-Certification-Assessment-Tool-CAT, Viewed in December 2024.

614 Greenpeace (2021, March 16), Destruction: certified, p. 89

615 World Wildlife Fund for Nature (2015, May 18), "WWF Forest Certification Assessment Tool (CAT)", online: https://wwf.panda.org/?246871/WWF-Forest-Certification-Assessment-Tool-CAT, Viewed in December 2024;

Greenpeace (2011, October 17), Sustainable Forestry Certificate Proves Unreliable in Practice.

Centrum Hout (2014, June), Certificeringsystemen (keurmerken) voor duurzaam bosbeheer. MTCS: Malaysian Timber Certification Scheme, Almere, Nederland: Centrum Hout.

616 Environmental Paper Network (n.d.), "Source fibre responsibly", online: https://environmentalpaper.org/tools-and-resources/paper-resources/responsible-sourcing/, Viewed in December 2024.

617 Greenpeace (2021), "Certification schemes such as FSC are greenwashing forest destruction", online: https://www.greenpeace.org/international/press-release/46802/certification-schemes-such-as-fsc-are-greenwashing-forest-destruction/, viewed in January 2023.

618 CDP (2017), Global Forests Report 2017. From risk to revenue: The investment opportunity in addressing corporate deforestation, London, the United Kingdom: Carbon Disclosure Project.

CDP (2019), Global Forests Report 2019. The Money Trees: The role of corporate action in the fight against deforestation, London, the United Kingdom: Carbon Disclosure Project.

619 GRI (2021, September), A Short Introduction to the GRI Standards, Amsterdam; the Netherlands.

620 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO, p. 6.

621 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO, p. 72.

622 UN (2011), Guiding Principles on Business and Human Rights. Implementing the United Nations "Protect, Respect and Remedy" Framework, Geneva, Switzerland: United Nations, p. 18.

623 Li., Z. et al. (2014), "A review of soil heavy metal pollution from mines in China: Pollution and health risk assessment", Science of the Total Environment, 468-469: p. 843-853;

Oxfam Australia (n.d.), "Impacts of Mining", online: https://www.oxfam.org.au/what-we-do/economic-inequality/mining/, viewed in January 2025.

624 Johnson, D.B. and Hallberg, K.B. (2004), "Acid mine drainage remediation options: a review", Science of the Total Environment, 338: p. 3-14;

Silva, L. et al. (2013), "Study of environmental pollution and mineralogical characterization of sediment rivers from Brazilian coal mining acid drainage", Science of the Total Environment, 447, p. 169-178http://dx.doi.org/10.1016/j.scitotenv.2012.12.013;

Romero, F. et al. (2010), "Acid drainage at the inactive Santa Lucia mine, western Cuba: Natural attenuation of arsenic, barium and lead, and geochemical behavior of rare earth elements", Applied Geochemistry, 25(5), p. 716-727.

625 Csavina, Janae et al. (2012), "A Review on the Importance of Metals and Metalloids in Atmospheric Dust and Aerosol from Mining Operations." The Science of the total environment, 433C: p. 58–73;

OKI (n.d.), "Mining", online: http://www.okinternational.org/mining, Viewed in January 2025.

626 Oxfam International (2015), Community consent index 2015. Oil, gas, mining company public positions on Free, Prior, and Informed Consent, Oxford, the United Kingdom: Oxford GB;

Forest Peoples Programme and the Amerindian peoples Association (2014), Indigenous peoples' rights and climate policies in Guyana: a special report;

Oxfam Australia (n.d.), "Impacts of mining", online: https://www.oxfam.org.au/what-we-do/mining/impacts-of-mining/, Viewed in January 2025.

627 Windfuhr, Michael (2017, July), Analysis: Safeguarding Human Rights in Land Related Investments: Comparison of the Voluntary Guidelines Land with the IFC Performance Standards and the World Bank Environmental and Social Safeguard Framework, Berlin, Germany: German Institute for Human Rights.

628 Csavina, Janae et al. (2012), "A Review on the Importance of Metals and Metalloids in Atmospheric Dust and Aerosol from Mining Operations." The Science of the total environment, 433C: p. 58–73;

OKI (n.d.), "Mining", online: http://www.okinternational.org/mining, Viewed in January 2025.

629 ILO (n.d.), "Mining (coal; other mining) sector", online: http://www.ilo.org/global/industries-and-sectors/mining/lang--en/index.htm, viewed in January 2025;

ILO (2024, April 29), "Addressing the invisible labour behind the cobalt mining industry", online: https://www.ilo.org/resource/news/addressing-invisible-labour-behind-cobalt-mining-industry, viewed in January 2025;

ILO (2023, Nov 20), "Tiny but mighty voices against child labour in cobalt mining", online: https://www.ilo.org/resource/news/tiny-mighty-voices-against-child-labour-cobalt-mining, viewed in January 2025.

630 Auty, R.M. (1993), Sustaining Development in Mineral Economies: The Resource Curse Thesis, London, the United Kingdom: Routledge.

631 Kaberuka, D. (2013, October 7), "Africa's Mineral Wealth: A Blessing Or A Curse?", All Africa. Online: http://allafrica.com/stories/201310110836.html viewed in January 2025;

Revenue Watch Institute (2013), The 2013 Resource Governance Index – A measure of transparency and accountability in the oil, gas and mining sector, New York, the United States: Revenue Watch Institute;

Natural Resource Governance Institute (2015, March), The Resource Curse: The Political and Economic Challenges of Natural Resource Wealth, NRGI reader;

Beck, T. (2017, 4 April), "Is there a natural resource curse in finance?", online: https://blogs.worldbank.org/en/allaboutfinance/there-natural-resource-curse-finance, viewed in January 2025.

632 Mathiason, N. (2011), The Piping Profits Report, Oslo, Norway: Publish What You Pay Norway.

633 Mathiason, N. (2011), The Piping Profits Report, Oslo, Norway: Publish What You Pay Norway;

Van Gelder, JW. et al (2016, 23 December), Tax avoidance by mining companies in developing countries: An analysis of potential Dutch policy initiatives, Amsterdam, the Netherlands: Profundo and Offshore Kenniscentrum.

634 Global Witness (2015), "Responsible Minerals", online: https://www.globalwitness.org/campaigns/conflict-minerals/, viewed in January 2025.

635 Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development (IGF) (2022), Gendered Impacts of Covid-19 on Artisanal and Small-Scale Mining (ASM), Winnipeg: IISD. p. 1

636 Buxton, A. (2013), Responding to the challenge of artisanal and small-scale mining. How can knowledge networks help?, London, the United Kingdom: IIED Sustainable Markets.

637 Amnesty International (2018, February), Amnesty International Report 2017-18: The state of the world's human rights, London, the United Kingdom: Amnesty International.

638 WWF (2021, February), In Too Deep: What We Know and Don't Know About Deep Seabed Mining, World Wildlife Fund, p. 4.

639 UN Environment (2017, 14 December), "UN Environment Assembly moves to curb pollution from extractive industries", online: www.unenvironment.org/news-and-stories/story/un-environment-assembly-moves-curb-pollution-extractive-industries, viewed in January 2025.

640 Responsible Mining Foundation (n.d.), “Tailings Management: learnings and good practice”, online: https://www.responsibleminingfoundation.org/research/tailing-management/, Viewed in January 2025.

641 Amnesty International (2010), Haki Zetu. ESC rights in Practice. Land and Human Rights, Amsterdam, the Netherlands: Amnesty International Netherlands, p.10.

642 Culotta, K., Engel, T. and J. Perry (2011, April 27), Dodd-Frank’s “Conflict Minerals” Provision: Expected to Impact Nearly Half of All U.S. Public Companies, Client Alert Energy & Natural Resources Practice, Houston, the United States: King and Spalding.

643 Natural Resource Governance Institute (2014, 12 June), Natural Resource Charter – 2nd Edition.

644 Culotta, K., Engel, T. and J. Perry (2011, April 27), Dodd-Frank’s “Conflict Minerals” Provision: Expected to Impact Nearly Half of All U.S. Public Companies, Client Alert Energy & Natural Resources Practice, Houston, the United States: King and Spalding.

645 European Commission (n.d.), “Conflict Minerals Regulation”, online: https://policy.trade.ec.europa.eu/development-and-sustainability/conflict-minerals-regulation_en, viewed in January 2025.

646 European Commission (n.d.), “Conflict Minerals Regulation”, online: https://policy.trade.ec.europa.eu/development-and-sustainability/conflict-minerals-regulation_en, viewed in January 2025.

647 Center for Biological Diversity (n.d.), “URANIUM”, online: https://www.biologicaldiversity.org/programs/public_lands/energy/dirty_energy_development/uranium/, viewed in January 2025.

648 WHO (2024, September 27), “Asbestos”, online: https://www.who.int/news-room/fact-sheets/detail/asbestos, viewed in January 2025.

649 International Ban Asbestos Secretariat (n.d.), “Current Asbestos Bans”, online: http://www.ibasecretariat.org/alpha_ban_list.php, viewed in January 2025.

650 IUCN (2022, May), “Issues Brief – Deep-Sea Mining”, IUCN, online: https://www.iucn.org/sites/default/files/2022-07/iucn-issues-brief_dsm_update_final.pdf, viewed in January 2025.

651 United Nations Framework Convention on Climate Change (2016, 5 October), “The Paris Agreement”, online: https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement, viewed in January 2025.

652 UNEP (2022), Emissions Gap Report 2022, Nairobi, Kenya: United Nations Environment Programme (UNEP), p. xvi.

653 UNEP (2019), Emissions Gap Report 2019, Nairobi, Kenya: United Nations Environment Programme (UNEP), p. xxii.

654 UNEP (2017), The Emissions Gap Report 2017, United Nations Environment Programme (UNEP), Nairobi, Kenia, p. xv.

655 International Energy Agency (2021, May), Net Zero by 2050.

656 Reclaim Finance (2023), *METALLURGICAL COAL FINANCING: Time to call it off,* Paris, France: Reclaim Finance.

657 Hendryx, M. and M. Ahern (2009), “Mortality in Appalachian coal mining regions: the value of statistical life lost”, Public Health Reports, 124(4): 541-550;

Ahern, M. et al. (2011), “The association between mountaintop mining and birth defects among live births in central Appalachia, 1996-2003”, Environmental Research, 111(6): 838-846;

Gilbert, N. (2010, October), “Mountaintop mining plans close to defeat Environmental review details 'unacceptable' impacts”, Nature News, online: http://www.nature.com/news/2010/101027/full/4671021a.html, viewed in January 2025.

658 The New York Times (2015), “A New Tack in the War on Mining Mountains PNC Joins Banks Not Financing Mountaintop Coal Removal”, online: https://www.nytimes.com/2015/03/10/business/dealbook/pnc-joins-banks-not-financing-mountaintop-coal-removal.html, Viewed in January 2025;

RAN (2014, December 26), “2014 in Review: Big Banks Ditch Mountaintop Removal Coal”, online: https://www.ran.org/the-understory/2014_in_review_big_banks_ditch_mountaintop_removal_coal/, viewed in January 2025.

659 Schücking, H. (2017, 9 November), “It's time for impact divesting: the Global Coal Exit List for the finance industry is launched”, BankTrack, online:

https://www.banktrack.org/blog/its_time_for_impact_divesting_the_global_coal_exit_list_for_the_finance_industry_is_launched, Viewed in January 2025.

660 Coal Exit (n.d.), “Database: Companies on Coal Expansion Course”, online: https://www.coalexit.org/data, Viewed in November 2024.

661 UNEP (2012), Sustainable Reconstruction in Disaster-Affected Countries, Nairobi, Kenya: United Nations Environment Program, RAN, Sierra Club and Swiss Resource Centre and Consultancies for Development;

Collins, B. et al (2015, May 4), The End of Coal? Coal Finance Report Card 2015, Rainforest Action Network, Sierra Club, BankTrack.

662 International Council on Mining and Metals (n.d.), “Our Principles”, online: https://www.icmm.com/en-gb/our-principles, viewed in January 2025.

663 OECD (n.d.), “Alignment assessment of industry programmes with the OECD mineral guidance”, online: http://mneguidelines.oecd.org/industry-initiatives-alignment-assessment-minerals.htm, viewed in January 2025.

664 Responsible Mining Foundation (2018), Responsible Mining Index 2018, Nyon, Switzerland: Responsible Mining Foundation.

665 GRI (2021, September), A Short Introduction to the GRI Standards, Amsterdam; the Netherlands.

666 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO, p. 6.

667 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO, p. 72.

668 UN (2011), Guiding Principles on Business and Human Rights. Implementing the United Nations “Protect, Respect and Remedy” Framework, Geneva, Switzerland: United Nations, p. 18.

669 EIA (2022, 1 August), “Oil and petroleum products explained”, online: https://www.eia.gov/energyexplained/oil-and-petroleum-products/oil-and-the-environment.php, Viewed in January 2025;

UCSUSA (2023, May 9), “Environmental impacts of natural gas”, online: https://www.ucsusa.org/resources/environmental-impacts-natural-gas, Viewed in January 2025.

670 DeMeritt, J. and Young, J. (2013), “A political economy of human rights: Oil, natural gas, and state incentives to repress”, Conflict Management and Peace Science, 30(2): p. 99-120;

UNICEF (2015), Oil and gas scoping study Unicef extractive pilot, Geneva, Switzerland: UNICEF.

671 The Hague Institute for Global Justice (2013), Policy Brief 4. Escaping the Resource Curse in Sub-Saharan Africa, The Hague, the Netherlands: the Hague Institute for Global Justice.

672 PAX (n.d.), “Business, Conflict & Human Rights”, online: https://paxforpeace.nl/what-we-do/programmes/business-conflict-human-rights/, Viewed in January 2025.

673 UN (2017, 6 November), “Protect environment from wars and conflicts, UN urges on International Day”, online: https://news.un.org/en/story/2017/11/570062, Viewed in January 2025.

674 Mathiason, N. (2011), The Piping Profits Report, Oslo, Norway: Publish What You Pay Norway

675 Mathiason, N. (2011), The Piping Profits Report, Oslo, Norway: Publish What You Pay Norway ;

Dorp, van, M. (2016, January), How Shell, Total and Eni benefit from tax breaks in Nigeria’s gas industry, Amsterdam, the Netherlands: SOMO;

Weyzig, F. (2013, 21 October), International finance and tax avoidance via Dutch Special Purpose Entities.

676 FracTracker Alliance (n.d), “Clean Energy Action Maps”, online: https://www.fractracker.org/resources/clean-energy-action/, Viewed in January 2025.

677 International Energy Agency (2021, May), Net Zero by 2050;

SEI, IISD, ODI, E3G, and UNEP (2021, October), The Production Gap Report 2021.

678 UN Environment (2017, 14 December), “UN Environment Assembly moves to curb pollution from extractive industries”, online: www.unenvironment.org/news-and-stories/story/un-environment-assembly-moves-curb-pollution-extractive-industries, Viewed in January 2025.

679 Milieudefensie (2010), Double Standard: Shell Practices in Nigeria Compared with International Standards to Prevent and Control Pipeline Oil Spills and the Deepwater Horizon Oil Spill, Amsterdam, the Netherlands: Milieudefensie, p.21.

680 World Bank (n.d.), "Global Flaring and Methane Reduction Partnership (GFMR)", online: https://www.worldbank.org/en/programs/gasflaringreduction/gas-flaring-explained, viewed in January 2025.

681 Amnesty International (2010), Haki Zetu. ESC rights in Practice. Land and Human Rights, Amsterdam, the Netherlands: Amnesty International Netherlands, p.10.

682 Mathiesen, K. (2015, March 30), "Doctors and academics call for ban on 'inherently risky' fracking', The Guardian, online: https://www.theguardian.com/environment/2015/mar/30/doctors-and-academics-call-for-ban-on-inherently-risky-fracking, Viewed in January 2025;

Mielke, E., L. Diaz Anadon and V. Narayanamurti (2010, October), "Water Consumption of Energy Resource Extraction, Processing, and Conversion", Energy Technology Innovation Policy Project, Belfer Center, online: https://www.belfercenter.org/publication/water-consumption-energy-resource-extraction-processing-and-conversion , Viewed in January 2025.

683 United Nations Framework Convention on Climate Change (2016, 5 October), "The Paris Agreement", online: https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement, Viewed in January 2025.

684 WWF (2016, 3 October), Infographic: Keep Arctic Oil under the Sea, World Wildlife Fund.

685 UNEP (2022), Emissions Gap Report 2022, Nairobi, Kenya: United Nations Environment Programme (UNEP), p. xvi.

686 UNEP (2019), Emissions Gap Report 2019, Nairobi, Kenya: United Nations Environment Programme (UNEP), p. xxii.

687 International Energy Agency (2021, May), Net Zero by 2050.

688 GRI (2021, September), A Short Introduction to the GRI Standards, Amsterdam; the Netherlands.

689 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO, p. 6.

690 ISO (2010), ISO 26000: 2010 Guidance on Social Responsibility, Geneva, Switzerland: ISO, p. 72.

691 UN (2011), Guiding Principles on Business and Human Rights. Implementing the United Nations "Protect, Respect and Remedy" Framework, Geneva, Switzerland: United Nations, p. 18.

692 United States Environmental Protection Agency (n.d.), "Global Greenhouse Gas Overview", online: https://www.epa.gov/ghgemissions/global-greenhouse-gas-overview, Viewed in January 2025.

693 Jones, D. et al (2016, June), Europe's Dark Cloud: How coal-burning countries are making their neighbours sick, Brussels, Belgium: WWF European Policy Office, Sandbag, CAN Europe and HEAL.

694 UCS USA (2017, Dec 19), "Coal and air pollution", online: https://www.ucsusa.org/resources/coal-and-air-pollution, Viewed in January 2025.

695 UCS USA (2023, May 9), "Environmental impacts of natural gas", online: https://www.ucsusa.org/resources/environmental-impacts-natural-gas, Viewed in January 2025.

696 WWF (2003), WWF Position Paper Nuclear Power, Gland, Switzerland: World Wide Fund for Nature;

Greenpeace USA (n.d.), "Nuclear Energy", online: https://www.greenpeace.org/usa/climate/issues/nuclear/, Viewed in January 2025.

697 World Commission on Dams (2000, November), Dams and Development. A New Framework for Decision-making, London, the United Kingdom: Earthscan Publications.

698 Fair Finance Asia (2024, March), *Enhancing Sustainable Finance in Mekong Hydropower: Challenges, Opportunities, and Ways Forward*.

699 Fearnside, P. and Pueyo, S. (2012), "Greenhouse-gas emissions from tropical dams". Nature Climate Change, 2, 382 – 384;

Union of Concerned Scientists (2013, Mar 3). "Environmental impacts of hydroelectric power", online: https://www.ucsusa.org/resources/environmental-impacts-hydroelectric-power, Viewed in January 2025.

700 International Rivers (2020), Rivers for Recovery: Protecting Rivers and Rights Essential for a Just and Green Recovery;

International Rivers (n.d.), “The surprising success of micro hydro”, online: https://www.internationalrivers.org/news/the-surprising-success-of-micro-hydro/, Viewed in January 2025.

701 United Nations (n.d.), “Goal 7”, online: https://sdgs.un.org/goals/goal7, Viewed in January 2025.

702 United Nations (n.d.), “Sustainable Development Goals”, online: https://sdgs.un.org/goals, Viewed in January 2025.

703 IPCC (2018), Global Warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty, Geneva, Switzerland: Intergovernmental Panel on Climate Change, p. 12.

704 UNEP (2022), Emissions Gap Report 2022 : The Closing Window, Climate crisis calls for rapid transformation of societies.: United Nations Environment Programme (UNEP), p. XVI.

705 UNEP (2022), Emissions Gap Report 2022 : The Closing Window, Climate crisis calls for rapid transformation of societies.: United Nations Environment Programme (UNEP), p. 40.

706 International Energy Agency (2021, May), Net Zero by 2050.

707 Schücking, H. (2017, 9 November), “It's time for impact divesting: the Global Coal Exit List for the finance industry is launched”, BankTrack, online: https://www.banktrack.org/blog/its_time_for_impact_divesting_the_global_coal_exit_list_for_the_finance_industry_is_launched, Viewed in January 2025.

708 Coal Exit (n.d.), “Database: Companies on Coal Expansion Course”, online: https://www.coalexit.org/data, Viewed in November 2024.

709 Greenpeace USA (n.d.), “Nuclear energy”, online: http://www.greenpeace.org/usa/global-warming/issues/nuclear/, Viewed in January 2025.

710 UN Environment (2017, 14 December), “UN Environment Assembly moves to curb pollution from extractive industries”, online: www.unenvironment.org/news-and-stories/story/un-environment-assembly-moves-curb-pollution-extractive-industries, Viewed in January 2025.

711 Amnesty International (2010), Haki Zetu. ESC rights in Practice. Land and Human Rights, Amsterdam, the Netherlands: Amnesty International Netherlands, p.10.

712 World Commission on Dams (2000, November), Dams and Development. A New Framework for Decision-making, London, the United Kingdom: Earthscan Publications;

Finer, M. and C. N. Jenkins (2012), “Proliferation of Hydroelectric Dams in the Andean Amazon and Implications for Andes-Amazon Connectivity”, PLoS ONE, 7(4);

Fearnside, P. and Pueyo, S. (2012), “Greenhouse-gas emissions from tropical dams”. Nature Climate Change, 2, 382 – 384;

Union of Concerned Scientists (2013, Mar 3). “Environmental impacts of hydroelectric power”, online: https://www.ucsusa.org/resources/environmental-impacts-hydroelectric-power, Viewed in January 2025.

713 International Rivers Network (2002), Citizen’s Guide to the World Commission on Dams, Berkeley, the United States: International Rivers Network;

WWF Global Freshwater Programme (2005), To Dam or not to Dam? Five years on from the World Commission on Dams, Zeist, The Netherlands: WWF Global Freshwater Programme.

714 World Commission on Dams (2000, November), Dams and Development. A New Framework for Decision-making, London, the United Kingdom: Earthscan Publications.

715 Hydropower Sustainability Council (n.d.), “Hydropower Sustainability Tools”, online: https://www.hs-alliance.org/sustainability-tools, Viewed in December 2024.

716 European Commission (n.d.), “Biofuels”, online: https://ec.europa.eu/energy/en/topics/renewable-energy/biofuels/overview, Viewed in November 2022;

Lapola, D.M. et al. (2010), “Indirect land-use changes can overcome carbon savings from biofuels in Brazil”, PNAS, 107(8).

717 GRI (2021, September), A Short Introduction to the GRI Standards, Amsterdam; the Netherlands.

Profundo

Research & advice

Radarweg 505
1043 NZ Amsterdam
The Netherlands
+31-20-8208320
profundo@profundo.nl
www.profundo.nl