To: **Mr. Emilio Benito Aquino, Chairman, Securities and Exchange Commission, Philippines**

Date: **January 11, 2019**

Re: **Comments and Input on Draft Sustainability Reporting Guidelines and Reporting Template for Publicly-Listed Companies**

Dear Mr. Chairman:

The Sustainability Accounting Standards Board (SASB) is an independent 501(c)(3) not-for-profit organization that issues industry-specific sustainability accounting standards for the disclosure of financially material information to investors. At SASB, we believe capital markets work best when investors have the decision-useful information needed to allocate capital to businesses likely to succeed over the long-term. The SASB standards are industry-specific, enabling comparison of performance using industry-relevant metrics. The standards help businesses and investors understand long-term risks and opportunities.

We congratulate the SEC-Philippines in the development of the Sustainability Reporting Guidelines and Reporting Template for Publicly Listed Companies. Structuring the guidelines and reporting template to build upon four globally accepted frameworks (IIRC, GRI, SASB, and TCFD), along with the ability to report on contributions to the Sustainable Development Goals, demonstrates leadership among regulators. It also offers companies a flexible approach that drives better alignment in the corporate reporting landscape and makes it easier for companies to prepare effective and coherent disclosures that meet the information needs of capital markets and society. SASB supports your efforts to enable reporting of sustainability data that is comparable, consistent, and decision-useful. As businesses improve their performance on key environmental and social factors, we can all benefit from more sustainable economic growth.

After reviewing the guidelines, we offer the following comments and input for your consideration:

PORTION of the SUSTAINABILITY REPORTING GUIDELINES AND TEMPLATE	COMMENTS	PROPOSED CHANGE
Page 3, Footnote 6	The information comes directly from SASB's Conceptual Framework. We recommend using the direct citation in the footnote.	Replace: "Adopted from the Sustainability Accounting Standards Board (SASB, 2017)", with **"The Sustainability Accounting Standards**

		Board Conceptual Framework (2017)"
Page 3, Paragraph 3, Line 1 (Description of SASB)	SASB has established standards for 77 industries.	Replace: "80", with **"77"**
Page 3, Table entitled "Reporting Standards/Frameworks" Row Title: Materiality (Coverage) Column Title: SASB	In November, SASB released updated standards along with key messaging which reflects our approach to financial materiality. This updated information is included in Table 4.3 of the Recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). We recommend a similar description here to demonstrate alignment among guidance documents.	Replace: "A fact is material if there is a substantial likelihood that a reasonable investor would view its omission or misstatement as having significantly altered the total mix of information", with **"Financially material issues that are reasonably likely to impact the financial condition or operating performance of the typical company within an industry and therefore are most important to investors"**
Pages 8-10, Graphics on Economic, Environmental, and Social Disclosure Topics	The graphics include numbers or codes in parentheses without explanation or information on the standards they reference. We recommend removal of the codes here, as more detailed information in provided in Annex B: Topic Guide.	We recommend removal of the numbers in parenthesis within the Economic, Environmental, and Social graphics
Page 10, Social Graphic	We support the addition of the "Data Security" Topic to the Guide as this is a financially material sustainability issue for many industries.	Add the box for "Data Security" to align with Annex B: Topic Guide.
Page 43, Annex B: Topic Guide: Economic: Anti-corruption	SASB has categorized Anti-Corruption topics and metrics within the General Issue Category, Business Ethics. To allow PLCs to find this information easily, we recommend the addition of a citation, as you have done for the GRI standards.	Add: **See SASB Standards General Issue Category: Business Ethics**
Page 43, Annex B: Topic Guide: Environment: Ecosystems and Biodiversity	SASB has categorized Ecosystems and Biodiversity topics and metrics within the General Issue Category, Ecological Impacts. To allow PLCs to find this information easily, we recommend the addition of a citation,	Add: **See SASB Standards General Issue Category: Ecological Impacts**

	as you have done for the GRI standards.	
Page 43, Annex B: Topic Guide: Environment: Resource Management	SASB has categorized Resource Management topics and metrics within the General Issue Categories: Energy Management, Water & Wastewater Management, Management, Material Sourcing and Efficiency. To allow PLCs to find this information easily, we recommend the addition of a citation, as you have done for the GRI standards.	Add: **See SASB Standards General Issue Categories: Energy Management; Water & Wastewater Management; Material Sourcing and Efficiency**
Page 43, Annex B: Topic Guide: Environment: Environmental Impact Management	SASB has categorized Resource Management topics and metrics within the General Issue Categories: GHG Emissions; Air Quality; Water & Wastewater Management; and Waste & Hazardous Materials Management. To allow PLCs to find this information easily, we recommend the addition of a citation, as you have done for the GRI standards.	Add: **See SASB Standards General Issue Categories: GHG Emissions; Air Quality; Water & Wastewater Management; and Waste & Hazardous Materials Management**
Page 43, Annex B: Topic Guide: Environment: Environmental Compliance	SASB has categorized Environmental Compliance topics and metrics within the General Issue Categories: Ecological Impacts; Air Quality; Water & Wastewater Management; and Waste & Hazardous Materials Management. To allow PLCs to find this information easily, we recommend the addition of a citation, as you have done for the GRI standards.	Add: **See SASB Standards General Issue Category: Ecological Impacts; Air Quality; Water & Wastewater Management; and Waste & Hazardous Materials Management**
Page 44, Annex B: Topic Guide: Social: Employee Management	SASB has categorized Employee Management topics and metrics within the General Issue Categories: Labor Practices; and Employee, Engagement, Diversity & Inclusion. To allow PLCs to find this information easily, we recommend the addition of a citation, as you have done for the GRI standards.	Add: **See SASB Standards General Issue Categories: Labor Practices; and Employee, Engagement, Diversity & Inclusion**
Page 44, Annex B: Topic Guide: Social: Workplace Conditions	SASB has categorized Workplace Conditions topics and metrics within the General Issue Category: Employee Health & Safety. To allow PLCs to find this information easily, we recommend the addition of a	Add: **See SASB Standards General Issue Category: Employee Health & Safety**

	citation, as you have done for the GRI standards.	
Page 44, Annex B: Topic Guide: Social: Supply Chain Management	SASB has categorized Supply Chain Management topics and metrics within the General Issue Category: Supply Chain Management. To allow PLCs to find this information easily, we recommend the addition of a citation, as you have done for the GRI standards.	Add: **See SASB Standards General Issue Category: Supply Chain Management**
Page 44, Annex B: Topic Guide: Social: Relationship with Community	SASB has categorized Relationship with Community topics and metrics along the General Issue Category: Human Rights & Community Relations. To allow PLCs to find this information easily, we recommend the addition of a citation, as you have done for the GRI standards.	Add: **See SASB Standards the General Issue Category: Human Rights & Community Relations**
Page 44, Annex B: Topic Guide: Customer Management	SASB has categorized Customer Management topics and metrics along the General Issue Categories: Product Quality & Safety; Customer Welfare; and Selling Practices & Product Labeling. To allow PLCs to find this information easily, we recommend the addition of a citation, as you have done for the GRI standards.	Add: See SASB Standards General Issue Categories: Product Quality & Safety; Customer Welfare; and Selling Practices & Product Licensing

Thank you for considering these recommendations. If you have any additional questions or comments, please contact me at jeff.hales@sasb.org.

Sincerely,

Jeffrey Hales, PhD
Chair of the SASB Standards Board
Sector Chair for Financials and Renewable Resources & Alternative Energy