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An open letter to financial infrastructure and data providers from the Investor Advisory Group (IAG) of the Sustainability Accounting Standards Board (SASB)

Data establishes a common language for investors, underpinning investment decisions across markets. Data in financial statements helps inform valuations of companies, determinations of creditworthiness, and a range of other investment considerations across markets, but this has not always been the case. Prior to the advent of generally accepted accounting principles (GAAP) for financial reporting, financial data lacked consistency, comparability, and reliability, leaving investors with unreliable insights into the historical, current, or future financial health of the companies to which they provide capital.

Investors today face similar challenges with regard to the data available to them on the environmental, social, and governance (ESG) issues that can affect corporate performance. While the ESG disclosure landscape has evolved and continues to mature^{1, 2, 3}, the expertise, technology, and skills of established financial data infrastructure firms are needed today to harmonize existing ESG data sets. Thus, as members of SASB's Investor Advisory Group (IAG) – over 50 institutional investors representing over US\$40 Trillion in assets and markets around the world (members appended below) – we are writing this open solicitation to data providers for the creation of new data sets based on the collection and organization of SASB-based data as reported by companies, to complement other data sets.

SASB Standards – which are industry-specific and framed upon financial materiality – improve understanding of company performance on the ESG issues most relevant to long-term value creation (or destruction). The Standards, which are the result of eight years of research and feedback from thousands of market participants around the world, balance concerns of reporting companies about cost-effective disclosure with needs of investors for decision-useful information. Detailed supporting context underpinning SASB Standards, and technical protocols for the collection and normalization of data included in the Standards, strike a balance between rigor and transparency. Disclosure via SASB Standards yields improved quality and comparability of ESG data. Furthermore, SASB's ongoing standards maintenance and due process enable SASB to respond to evolving ESG issues and market needs.

¹ The European Commission (EC) issued a request for technical advice mandating EFRAG to undertake preparatory work for the elaboration of possible EU non-financial reporting standards in a revised Non-Financial Reporting Directive.

²Statement of Intent to Work Together towards Comprehensive Corporate Reporting

³ IFRS Foundation Consultation Paper on Sustainability Reporting

In 2020 alone (as of November 30, 2020), <u>497 companies</u> disclosed SASB metrics, which is a 324% increase from the number of companies that disclosed SASB metrics in all of 2019. We expect the number of reporting companies to continue to quickly grow as more investors ask their portfolio companies to include SASB-based disclosure on ESG performance in their investor-focused communications.^{4,5}

While the asset owners and asset managers comprising SASB's IAG span markets and employ a range of investment styles and strategies, we share the common belief that SASB Standards can help meet investor needs for consistent, comparable, and reliable disclosure of financially-material, decision-useful ESG information. Just as we rely on data from financial statements to inform investment decisions, we need equally reliable, transparent ESG information to help inform investment decision-making. We invite data providers to meet this market need through the collection and provision of company reported SASB data, in addition to other ESG data sets.

Thank you,

Members of SASB's Investor Advisory Group

SASB's Investor Advisory Group Members supporting this letter:

Allianz Global Investors

Dr. Steffen Hörter, Global Head of ESG

APG (All Pensions Group)

Egon Vavrek, Director Global Emerging Markets Equities, Fundamental Strategies

ATP

Christian Kjaer, Head of Liquid Markets, Vice President Ole Buhl, Head of ESG, Senior Vice President

AXA Investment Managers

Clémence Humeau Responsible Investment Coordinator

Rebecca Greenberg Investment Grade Credit Analyst

BCI (British Columbia Investment Management Corporation)

Jennifer Coulson, Vice President, ESG | Public Markets

⁴ Consistent with the <u>IAG Statement</u>, IAG members ask for the inclusion of SASB disclosure in investor-focused communications.

⁵ Recent statements and resolutions from investor trade associations call on companies to base their ESG disclosure on SASB and TCFD, including: a joint statement from the CEO's of Canada's eight largest pension funds; a declaration from 80 investors who are members of Mexico's Consejo Consultivo de Finanzas Verdes; recommendations of the UK Treasury-led Asset Management Task Force on Stewardship, and; the unanimous board resolution of the Investment Company Institute.

BlackRock

Michelle Edkins, Managing Director & Global Head of Investment Stewardship

Ray Cameron, Head of Investment Stewardship – The Americas **Boston Trust Walden**

Heidi Soumerai, Managing Director

Amy Augustine, Director of ESG Investing

Breckinridge Capital Advisors

Peter Coffin, Founder & President

Rob Fernandez, Vice President & Director of ESG Research

Brunel Pension Partnership

Faith Ward, Chief Responsible Investment Officer

CalPERS

Dan Bienvenue, Deputy Chief Investment Officer, Total Portfolio

Simiso Nzima, Investment Director & Head of Corporate Governance, Global Equity

CalSTRS

Christopher Ailman, Chief Investment Officer; IAG Chair Emeritus

Kirsty Jenkinson, Investment Director, Sustainable Investment & Stewardship Strategies

Calvert Research & Management

John Streur, President & CEO

John Wilson, Vice President, Director of Corporate Engagement

Capital Group

Robert W. Lovelace, Vice Chairman

Heather Lord, Senior Vice President, Strategy & Innovation

Jessica Ground, Global Head of ESG

CRUS

Nicole Bradford, Portfolio Head, Responsible Investment

CDPQ

Réjean Nguyen, Director, Investment Stewardship

CPP Investments

Richard Manley, Managing Director, Head of Sustainable Investing

Ben Lambert, Senior Portfolio Manager, Sustainable Equity

Dai-Ichi Life Insurance Group

Akifumi Kai, General Manager, Investment Planning Department

Miyuki Zeniya, Head of Sustainable Finance

Domini Impact Investments

Carole Laible, CEO

Corey Klemmer, Director of Engagement

Federated Hermes

Eoin Murray, Head of Investment

Dr. Michael Viehs, Associate Director – ESG Integration

Fidelity Investments

Pam Holding, Co-Head, Equity Division

Nicole Connolly, Head of ESG Investing and Portfolio Manager

Franklin Templeton Investments

Julie Moret, Head of ESG

Future Fund

Joel Posters, Head of Investment Stewardship & ESG

Goldman Sachs Asset Management

John Goldstein, Managing Director, Head of the Sustainable Finance Group

Catherine Winner, Vice President, Global Head of Stewardship

Harvard Management Company

Michael Cappucci, Managing Director, Compliance and Sustainable Investing

Inclusive Capital Partners

Eva Zlotnicka, Founder & Managing Partner

Ivy Investment Management Company

Dan Hanson, Chief Investment Officer

Gil Scott, Director of Research

LACERA

Jonathan Grabel, Chief Investment Officer

Scott Zdrazil, Senior Investment Officer

Legal & General Investment Management America

Aaron Meder, Chief Executive Officer

Man Group

Robert Furdak, CIO for ESG

Jason Mitchell, Co-Head of Responsible Investment

Steven Desmyter, Co-Head of Responsible Investment

Manulife Investment Management

Peter Mennie, Global Head of ESG and Risk

Margaret Childe, Managing Director, Head of ESG, Canada

Morgan Stanley Investment Management

Ted Eliopoulos, Vice Chair Investment Management & Head of Strategic Partnerships

Rui de Figueiredo, Co-Head and Chief Investment Officer, Solutions & Multi-Asset Group

Neuberger Berman

Joseph V. Amato

President of Neuberger Berman Group LLC, Chief Investment Officer of Equities

Jonathan Bailey, Managing Director and Head of ESG Investing

New York City Retirement Systems

Alex Doñé, Deputy Comptroller & Chief Investment Officer, NYC Bureau of Asset Management

Michael Garland, Assistant Comptroller – Corporate Governance and Responsible Investment, NYC Office of the Comptroller

Nissay Asset Management

Tomoaki Fujii, Co-CIO

Toshikazu Hayashi, Chief Analyst

Nordea Asset Management

Eivind Lorgen Director Active Ownership, Responsible Investments *IAG Chair*

Katarina Hammar, Head of Responsible Investments

Norges Bank Investment Management

Wilhelm Mohn, Head of Sustainability Initiatives, Corporate Governance

Northern Trust Asset Management

Christopher Shipley, Senior Vice President and Head of Fundamental Equities

Ontario Teachers' Pension Plan

Deborah Ng, Director, Strategy and Risk

Walter Viguiliouk, Principal, Responsible Investing

Oregon State Treasury, Investment Division

Anna Totdahl, Investment Officer, ESG & Sustainability

Jennifer Peet, Corporate Governance Director

PGGM

Hans Op 't Veld, Head of Responsible Investment IAG Vice Chair

PIMCO

Del Anderson, Senior Vice President, Credit Research

Putnam Investments

Katherine Collins, Portfolio Manager and Head of Sustainable Investing

Paul Scanlon, Head of Credit Research

QMA (a PGIM company)

Margaret Stumpp, Senior Advisor

Pat Watral, Senior Governance Officer

RBC

Lindsay Patrick, Managing Director & Head, Sustainable Finance

Melanie Adams, Vice President and Head of Corporate Governance and Responsible Investment - RBC Global Asset Management

RPMI Railpen

Mads Gosvig, Chief Fiduciary Officer

Michael Marshall, Head of Sustainable Ownership

Schroders

Sarah Bratton Hughes, Head of Sustainability, North America

Andrew Howard, Global Head of Sustainable Investing

State Street Global Advisors

Lynn Blake, Executive Vice President & Chief Investment Officer, Global Head of Beta Solutions

Ben Colton, Co-head Asset Stewardship

Rob Walker, Co-head Asset Stewardship

Sustainable Insight Capital Management

George Parker, Chief Operating Officer & General C

Temasek International

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Gim Huay Neo, Managing Director, Sustainability

UAW Retiree Medical Benefits Trust

Hershel Harper, Chief Investment Officer

Malcolm Goepfert, Deputy Chief Investment Officer

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Christopher Greenwald, Head of Sustainable and Impact Investing Research

Vanguard

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Bill Roberts, Principal & Head of Investment Stewardship Policy and Research

Wells Fargo Asset Management

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Jessica Mann, Head of Stewardship

Wespath Investment Management

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