



Methodology Guide

Corporate Inequality Framework 2025 Oxfam

By SustainoMetric

10/7/25

Contents

OXF01 - Living Wage Commitment (Operations)	3
OXF02 - Living Wage Commitment (Supply Chain)	4
OXF03 - Living Wage Implementation Disclosure (Operations)	5
OXF04 - Living Wage Performance Data Disclosure.....	7
OXF05 - Pay Equity (Disclosure on average salaries of women and men).....	9
OXF06 – Pay Equity (Gender pay gap)	11
OXF07 - Workforce composition by gender.....	12
OXF08 – DEI policy	13
OXF09 – DEI responsibility	14
OXF10 – DEI implementation disclosure.....	15
OXF11 – Human Rights Due Diligence (Commitment to Respect Human Rights).....	19
OXF49_01: The company maps its supply chain and discloses the list of suppliers	23
OXF12 – Human Rights Due Diligence (Identifying Human Rights Risks and Impacts).....	24
OXF13 – Human Rights Due Diligence (Integrating and Acting on Human Rights Risks and Impacts)	25
OXF47 – Human Rights-related cases/complaints	29
OXF14 – Human Rights Due Diligence (Grievance Mechanisms for Workers, External Individuals and Communities)	31
OXF15 – Board Diversity & Accountability (Board Independence)	34
OXF16 – Board Diversity & Accountability (Board Independence)	36
OXF17 – Board Diversity & Accountability (Board Oversight).....	36
OXF18 – Board Diversity & Accountability (Board Diversity Performance).....	37
OXF19 – Board Diversity & Accountability (Worker Representation)	38
OXF20 – Management Committee Diversity.....	40
OXF48 – Investor/Shareholder's Influence	41
OXF21 – Collective Bargaining (Commitment)	41
OXF22 – Collective Bargaining (Coverage)	43
OXF23 – Non-standard Work Arrangements (NSWAs) (Performance) - % of part-time/total staff	44
OXF24 – Non-standard Work Arrangements (NSWAs) (Performance) - % of contractors/total staff.....	45
OXF25 – Non-standard Work Arrangements (NSWAs) (Performance) - % temporary employees/total staff	46
OXF26 – Political accountability (Disclosure).....	47
OXF27 – Political accountability (Policies)	49
OXF29 – Antitrust (Competitive Behaviour).....	50

OXF30 – CEO Pay (Total Compensation Performance).....	52
OXF31 – CEO Pay (CEO-Worker Pay Ratio).....	56
OXF32 – CEO Pay Linked to Stock Performance	58
OXF33 – CEO Pay (Pay linked to ESG)	60
OXF34 – Top managers (Total compensation performance)	61
OXF35 – Top managers (Top manager-Worker pay ratio)	64
OXF36 – Equity and Profit (Shareholder Payout)	65
OXF37 – Equity and Profit (Effective Employee Ownership)	67
OXF38 – Tax Practices (Policy on Responsible tax)	69
OXF39 – Tax Practices (Tax Transparency)	70
OXF40 – Tax Practices (No Tax Havens)	70
OXF41 – Climate Action (Net Zero Disclosure).....	71
OXF42 – Climate Action (Net Zero Commitment).....	73
OXF43 – Climate Action (Net Zero Performance)	76
OXF44 – Just Transition Plan.....	79
OXF45 – Just Transition (Green Investment).....	80
OXF46 – Just Transition (Green Investment).....	81

OXF01 - Living Wage Commitment (Operations)

The company commits to paying a living wage to all workers.

OXF01_01: Existence of a statement in which the company commits to pay a living wage to all employees in the company's publication

What to look for – A clear public statement where the company explicitly commits to paying a living wage (not just minimum wage) to all its direct employees **AND** actively participates in credible initiatives or collaborations (e.g., IDH, Living Wage Foundation, Fair Wage Network, etc.)

Where to look for – Sustainability report, human rights policy, annual report, company website (responsibility, people, or careers section)

Keywords – Living wage, fair wage, adequate wage, decent wage, wages aligned with cost of living, fair compensation, partnership with [IDH / Anker / Fair Wage Network], responsible wage strategy

Outcome - QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	The company commits to paying a living wage to all its workers AND actively participates in credible initiatives or collaborations
<input type="checkbox"/> Partial	The company either commits to paying a living wage or participates in credible initiatives, but not both
<input type="checkbox"/> No	If no such statement is found or if the commitment is vague or limited to certain employee groups

NOTES –

1. Ensure the language confirms it's a commitment (not just an aspiration) and that it covers all direct employees—region-specific or pilot references may not qualify.
2. A **living wage** is defined as an income that allows employees:
 - to provide a decent life for their family.
 - for standard working hours.
 - to cover their essential expenses (food, water, electricity, housing, education, health, clothing, etc.).
 - the ability to cope with some of life's uncertainties.

OXF01_02: The company pays a Living wage to all its employees

What to look for – Evidence that the company is paying a Living wage to all its employees across the globe. If there is evidence that no employee is paid below a living wage, i.e., no living wage gap exists, it would qualify for a yes.

Where to look for – Sustainability report, human rights policy, annual report, company website (responsibility, people, or careers section)

Keywords – Living wage, fair wage, adequate wage, decent wage, wages aligned with cost of living, fair compensation.

Outcome - QL

Scores	Evaluation Criteria
☑ Yes	The company pays a living wage to ALL its employees globally
⊘ Partial	The company pays a living wage to some employees (e.g., only HQ or select countries)
✗ No	The company does not pay a living wage to its employees Or No information found

NOTES –

1. A **living wage** is defined as an income that allows employees:
 - to provide a decent life for their family.
 - for standard working hours.
 - to cover their essential expenses (food, water, electricity, housing, education, health, clothing, etc.).
 - the ability to cope with some of life's uncertainties.
2. If the company reports that 50% or X% of employees are paid a living wage, this will fall under the **partial** score.

OXF02 - Living Wage Commitment (Supply Chain)

The company works towards suppliers paying a living wage or a living income to all the people that work for the company.

OXF02_01: Existence of a statement in which the company expects its suppliers to pay a living wage to all their workers across the supply chain

What to look for – A clear statement where the company **expects its suppliers to pay a living wage to all their workers across the supply chain, and this extends to tier 2 and 3 suppliers.**

The statement should indicate:

- A requirement that suppliers **pay living wages or living income** to workers at any tier (Tier 1, 2, or 3)

Where to look for – Supplier Code of Conduct, sustainability report, responsible sourcing policy, human rights policy, modern slavery statement, company website

Keywords – Living wage, living income, fair compensation, value chain workers, supply chain, supply chain workers, work with suppliers to close wage gap, wage assessments in supply chain, responsible sourcing + living wage

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	The policy covers all tiers of the supply chain (e.g., Tier 1, 2, and 3)
<input type="checkbox"/> Partial	The policy covers tier 1 (direct) suppliers only OR the policy does not cover all tiers of suppliers (for instance, it covers tier 1 and 2 suppliers but not tier 3)
<input type="checkbox"/> No	No commitment available

NOTES - Additionally capture the coverage of the commitment by tiers of supplier, as under:

1. Commitment covers Tier 1 suppliers (Yes/No)
2. Commitment covers Tier 2 suppliers (Yes/No)
3. Commitment covers Tier 3 suppliers (Yes/No)

OXF03 - Living Wage Implementation Disclosure (Operations)

The company reports on its implementation/progress of its living wage commitment.

OXF03_01: Description on KPIs roadmap on living wage implementation and stages achieved

What to look for – Evidence that the company is actively **implementing** its living wage commitment, not just stating it.

Specifically look for:

- A **time-bound action plan** with clear targets
- A **roadmap or set of milestones** for achieving living wage implementation
- Participation in **credible initiatives or collaborations** (e.g., IDH, Living Wage Foundation, Fair Wage Network)

Where to look for – Sustainability/ESG report, human rights report, implementation updates in annual reports, progress dashboards, or responsible wage policy documents

Keywords – Living wage action plan, implementation roadmap, progress report, closing the wage gap, wage improvement targets, milestones, partnership with [IDH / Anker / Fair Wage Network], responsible wage strategy

Outcome - QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	<p>Time-bound action plan, implementation roadmap with milestones, and participation in credible living wage initiatives</p> <div style="border: 1px solid #ccc; padding: 5px; margin-top: 10px;"> <p>Description:</p> <ul style="list-style-type: none"> - The company has a time-bound action plan or target for achieving living wages. - It discloses a detailed roadmap or milestones (e.g. timelines) - It demonstrates active participation in credible external initiatives or partnerships (e.g., Living Wage Foundation, IDH, Anker Methodology, Fair Wage Network, Ethical Trading Initiative (ETI), Fair Wear Foundation, etc). </div>
<input checked="" type="checkbox"/> No	<p>No implementation roadmap, milestones, or evidence of partnerships</p>

NOTES –

1. Confirm that the company **goes beyond commitment** and presents tangible **progress or steps**.
2. If only a policy or intention is stated but no progress, score as **No**.
3. Joint initiatives with NGOs or participation in industry-wide wage programs are good indicators of serious implementation.

OXF03_02: Description on KPIs roadmap on living wage implementation and stages achieved in the Supply chain

What to look for – Evidence that the company is actively **implementing** its living wage commitment, in the Supply chain.

Specifically look for:

- A **time-bound action plan** with clear targets
- A **roadmap or set of milestones** for achieving living wage implementation
- Participation in **credible initiatives or collaborations** (e.g., IDH, Living Wage Foundation, Fair Wage Network)

Where to look for – Sustainability/ESG report, human rights report, implementation updates in annual reports, progress dashboards, or responsible wage policy documents

Keywords – Living wage action plan, implementation roadmap, progress report, closing the wage gap, wage improvement targets, milestones, partnership with [IDH / Anker / Fair Wage Network], responsible wage strategy

Outcome - QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	<p>Time-bound action plan, implementation roadmap with milestones, and participation in credible living wage initiatives for Supply chain living wage implementation</p> <p>Description:</p> <ul style="list-style-type: none">- The company has a time-bound action plan or target for achieving living wages in the supply chain- It discloses a detailed roadmap or milestones (e.g. timelines)- It demonstrates active participation in credible external initiatives or partnerships (e.g., Living Wage Foundation, IDH, Anker Methodology, Fair Wage Network, Ethical Trading Initiative (ETI), Fair Wear Foundation, etc).
<input checked="" type="checkbox"/> No	No implementation roadmap, milestones, or evidence of partnerships

OXF04 - Living Wage Performance Data Disclosure

The company reports annually necessary data to evaluate living wage / living income performance.

OXF04_01: Workers with total remuneration below a living wage (%), disaggregated by gender.

Workers here are supply chain workers.

What to look for – Quantitative disclosure on:

1. The percentage of workers (**value chain/supply chain workers**) whose **total remuneration** is **below a recognized living wage or income benchmark**.
2. Data must be **disaggregated by gender** — male, female, and others where applicable.

Where to look for – Sustainability or human rights report, Supplier Responsibility / Ethical Sourcing Reports, Annexes with workforce or supplier data, Standalone Living Wage disclosures

Keywords – Percentage below living wage, wage gap, disaggregated by gender, below adequate remuneration, fair wage analysis, wage sufficiency, gender wage data

Outcome – QT (%)

NOTES – May involve calculation if the data is not directly disclosed.

1. Disclosure must include a **numerical percentage** and **gender breakdown**
2. If the company only discusses wages in general or provides average salaries without comparison to a living wage benchmark, capture and highlight in comment.

3. Watch for hidden disclosures in **appendices, dashboards, or footnotes.**

OXF04_02: Average size of living wage gap in supply chain by tier (%), disaggregated by gender.

What to look for – Numerical data showing the average percentage gap between actual pay and living wage across different supply chain tiers, disaggregated by gender.

Where to look for – Supplier responsibility reports, sustainability reports, ESG annexes, human rights disclosures

Keywords – Living wage gap, supply chain tiers, wage shortfall, disaggregated by gender, fair wage in supply chain, tier 1/2/3 wage data

Outcome – QT (%)

NOTES – May involve calculation if the data is not directly disclosed.

1. Ensure the company specifies both the supply chain tier (e.g., Tier 1, 2, 3) and the gender split

OXF04_03: People working for the company with total remuneration below a living wage (%), disaggregated by gender.

People here means the employees in own operation.

What to look for – Numerical percentage of the company’s direct employees whose total pay is below a defined living wage, with the data broken down by gender.

Where to look for – Sustainability report, human rights report, ESG data annex, workforce disclosures

Keywords – Below living wage, remuneration gap, wage sufficiency, fair pay, gender-disaggregated wage data, living wage coverage

Outcome – QT (%)

NOTES –

1. May involve calculation if the data is not directly disclosed.
2. If the company pays a living wage to **ALL** its employees globally (**yes in OXF01_02**), capture 0 here.

OXF04_04: Average size of living wage gap in corporate group (%), disaggregated by gender.

What to look for – Numerical disclosure of the average gap (%) between actual wages and the applicable living wage across the company’s own operations, with breakdown by gender.

Where to look for – Sustainability report, workforce data annex, human rights or fair wage disclosures, ESG dashboards

Keywords – Living wage gap, wage shortfall, average wage gap vs benchmark, disaggregated by gender, fair pay assessment, wage adequacy

Outcome – QT (%)

NOTES –

1. May involve calculation if the data is not directly disclosed.
2. If the company pays a living wage to **ALL** its employees globally (**yes in OXF01_02**), capture 0 here, as there would be no living wage gap.

OXF05 - Pay Equity (Disclosure on average salaries of women and men)

The company publishes data on average remuneration of women and men.

OXF05_01: Male average salary breakdown by employee category and/or country

What to look for – Numerical value showing average male salaries segmented by job level (e.g. executive, mid-level, entry-level) and/or by geographic location (e.g. country, region)

Where to look for – Sustainability reports, ESG disclosures, DEI reports, Annual reports, Company website (Investor Relations or Careers section), **ESRS S1-16** — Remuneration metrics (pay gap and total remuneration)

Keywords – Male average salary, gender pay gap, remuneration by category, salary by country, compensation breakdown, male earnings

Outcome - QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	There is disclosure both by employee category AND country
<input type="checkbox"/> Partial	There is disclosure by employee category OR by country

X No

No disclosure available

NOTES – Ensure consistency in units (e.g., annual vs. monthly pay) and check if the data is normalized (e.g., full-time equivalent). Look for footnotes or methodology sections that explain how averages are calculated—this can reveal whether bonuses, stock options, or other benefits are included.

OXF05_02: Female average salary breakdown by employee category and/or country

What to look for – Numerical value showing average female salaries segmented by job level (e.g. executive, mid-level, entry-level) and/or by geographic location (e.g. country, region)

Where to look for – Sustainability reports, ESG disclosures, DEI reports, Annual reports, Company website (Investor Relations or Careers section), **ESRS S1-16** — Remuneration metrics (pay gap and total remuneration)

Keywords – Female average salary, gender pay gap, remuneration by category, salary by country, compensation breakdown, female earnings

Outcome - QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	There is disclosure both by employee category AND country
<input type="checkbox"/> Partial	There is disclosure by employee category OR by country
X No	No disclosure available

NOTES – Ensure consistency in units (e.g., annual vs. monthly pay) and check if the data is normalized (e.g., full-time equivalent). Look for footnotes or methodology sections that explain how averages are calculated—this can reveal whether bonuses, stock options, or other benefits are included.

OXF06 – Pay Equity (Gender pay gap)

Adjusted and unadjusted gender pay gap.

OXF06_01: Disclosure of Gender pay gap breakdown by employee category and/or country

What to look for – Disclosure of gender pay gap figures segmented by job level (e.g., senior leadership, technical roles, support staff) and/or by geographic location, specifying whether the data is adjusted (controls for role, experience, etc.) or unadjusted.

Where to look for – Sustainability reports, DEI reports, ESG disclosures, Annual reports, Company website (Governance or Diversity section), **ESRS S1-16** — Remuneration metrics (pay gap and total remuneration)

Keywords – Gender pay gap, adjusted pay gap, unadjusted pay gap, salary comparison by gender, pay equity by category, wage disparity by country

Outcome - QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	Yes, disclosure by employee category Yes, disclosure by country Yes, disclosure both by employee category AND country
<input checked="" type="checkbox"/> No	No disclosure available

NOTES –

1. If the disclosure is available only for certain geographies, for eg. UK, mark No/ No disclosure available.
2. If the disclosure is through a scoring system (i.e. France’s system, e.g. TotalEnergies) then it is not relevant.

OXF06_02: Value of Gender pay gap breakdown by employee category and/or country

What to look for – Identify the numerical value (percentage) of the gender pay gap across different job levels and/or countries, and whether the figures are adjusted or unadjusted.

Where to look for – Sustainability reports, DEI reports, ESG disclosures, Annual reports, Company website (Diversity & Inclusion or Investor Relations section), **ESRS S1-16** — Remuneration metrics (pay gap and total remuneration)

Keywords – Gender pay gap value, wage disparity, adjusted pay gap, unadjusted pay gap, salary difference by category, compensation gap by country

Outcome – QT (%)

- a) Adjusted Pay Gap
- b) Unadjusted Pay Gap

NOTES –

1. Pay attention to how the gap is calculated—adjusted gaps control for factors like role and tenure, while unadjusted gaps reflect overall disparities.
2. If the data is available only for certain geographies, for eg. UK - leave the assessment value blank. Provide analyst comment for the same.

OXF07 - Workforce composition by gender

Includes (a) % of women in the workforce and (b) % of women in the different job functions/categories.

OXF07_01: Number of employees by employee category, disaggregated by gender.

What to look for – Disclosure for headcount data broken down by job category (e.g., executive, management, technical, support) and gender (male, female, non-binary/others), with percentages calculated for each gender group within each category.

Where to look for – Sustainability reports, DEI reports, ESG disclosures, Annual reports, Company website (Careers or Diversity section)

Keywords – Workforce composition, gender distribution, employee breakdown by gender, women in leadership, gender diversity by role

Outcome – QT (numerical, %)

- a) Total (#)
- b) Male (%)
- c) Female (%)
- d) Other (%)

NOTES – May involve calculation if the data is not directly disclosed.

1. Ensure that the percentages add up to 100% within each category. Cross-check totals with overall workforce numbers to validate consistency.
2. If the sum of male and female percentages equals 100%, record the percentage for 'Other' as 0.

- Do not calculate the % of male employees if data for them is not explicitly disclosed. Avoid doing 100 minus % of females.

OXF08 – DEI policy

The company has released a DEI policy commitment covering the company’s recruitment, hiring, training, promoting, and/or retention.

OXF08_01: Disclosure of specific policy commitments related to inclusion and (or) positive action for people from groups at particular risk of vulnerability in own workforce

What to look for – A clear public statement where the company explicitly commits to fostering inclusion, detailing actions or principles aimed at creating an equitable workplace for all employees, especially those from underrepresented or marginalized groups, covering the company’s recruitment, hiring, training, promoting, and/or retention.

Where to look for – DEI policy documents, Sustainability reports, ESG disclosures, Annual reports, Company website (Diversity & Inclusion or Corporate Responsibility section)

Keywords – Inclusion policy, positive action, vulnerable groups, DEI commitment, workforce diversity, equal opportunity, underrepresented communities

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	The company has a DEI policy covering ALL five aspects - recruitment, hiring, training, promoting, and/or retention
<input type="checkbox"/> Partial	The company has a DEI policy covering but it does not cover all five aspects
<input type="checkbox"/> No	No commitment available

OXF08_02: Disclosure of time bound plans related to the company’s recruitment, hiring, training, promoting, and/or retention

What to look for – Look for specific goals or time bound targets that address improvements or changes in either recruitment, hiring, training, promotion, or retention practices, and especially those tied to diversity, equity, and inclusion.

Where to look for – Sustainability reports, DEI reports, ESG disclosures, company website (DEI or careers section), investor presentations, proxy statements

Keywords – Time-bound goal, DEI recruitment target, diversity hiring timeline, inclusive training roadmap, promotion equity plan, retention strategy with deadlines, DEI milestones

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	The company discloses time bound quantitative DEI target
<input checked="" type="checkbox"/> No	No information or little relevant information

OXF09 – DEI responsibility

The CEO takes responsibility for disparities, and the company solicits input from diverse employees; there is an internal DEI department and a DEI officer.

OXF09_01: Has assigned responsibility at top management level for equal treatment and opportunities in employment, issue clear company-wide policies and procedures to guide equal employment practices, and link advancement to desired performance in this area

What to look for – Disclosure that senior leadership (e.g., CEO, executive team) is formally accountable for DEI outcomes, supported by documented policies and performance-linked incentives related to equal employment practices.

Where to look for – Sustainability reports, DEI reports, ESG disclosures, Annual reports, Company website (Leadership, Governance, or Diversity section)

Keywords – Executive accountability, DEI officer, equal opportunity policy, inclusive employment practices, performance-linked DEI goals, leadership responsibility

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	The company explicitly assigns DEI responsibility to top management (e.g., CEO, Chief Diversity Officer, Executive Committee).
<input checked="" type="checkbox"/> No	No evidence of top-level DEI responsibility

NOTES - Check whether DEI responsibilities are embedded in leadership roles or tied to KPIs. Strong governance includes regular reporting, employee feedback mechanisms, and integration of DEI into performance reviews or promotion criteria. Also, look for board-level oversight or cross-functional DEI committees.

OXF10 – DEI implementation disclosure

The company reports on its progress in implementing its DEI policy commitments including disclosure of hiring, retention, and promotion rate data across gender, race and ethnicity categories.

OXF10_01: Disclosure of DEI policies and how policies are implemented through specific procedures to ensure discrimination is prevented, mitigated and acted upon once detected, as well as to advance diversity and inclusion

What to look for – Detailed disclosure of internal procedures or mechanisms (e.g., grievance systems, training programs, audits) that operationalize DEI policies and actively address discrimination while promoting inclusion. (Assess whether the company provides examples of how these procedures are applied in practice, such as case studies, metrics, or feedback loops. Strong disclosures often include accountability structures, timelines, and third-party assessments or certifications.)

Where to look for – DEI policy, Sustainability reports, DEI reports, ESG disclosures, Annual reports, Company website (Ethics & Compliance, Diversity & Inclusion, or Human Resources section)

Keywords – Anti-discrimination procedures, DEI implementation, inclusive practices, grievance mechanisms accessible to all, diversity advancement, equal opportunity enforcement

Outcome – QL

Scores	Evaluation Criteria
☑ Yes	There is information on implementation of DEI policy (i.e., through grievance systems, training programs, audits, surveys, etc.).
✗ No	No such disclosure found or vague /incomplete information found.

OXF10_02: Description of relevant human rights policy commitments, safe-guard mechanism, gender-specific impact assessments, and grievance mechanisms identifying vulnerable or marginalised workers such as **women and vulnerable groups in own operation**

What to look for – in Evidence

- Explicit mention of vulnerable and marginalised workers, including women in policies (not just “diversity” or “inclusion” in generic terms) **in own operations**.
- Safeguards for vulnerable and marginalised workers, including women like safe working spaces, maternity protections (beyond regulatory and legal requirements), women-only committees, or targeted training **in own operations**. For disabled workers – accessibility, reasonable accommodations, inclusive hiring. For migrant workers – fair

recruitment practices, no retention of passports, cultural integration support. For temporary workers – equal pay for equal work, contract fairness, protection from arbitrary dismissal.

- HR Impact assessments **in own operations** considering vulnerable and marginalised workers, including women, that consider risks specific to women (harassment, pay gap, representation, etc.) and provide data disaggregated by gender.
- Grievance channels accessible to all (confidential, anonymous, culturally appropriate, in local languages).

The company identifies potential challenges and outlines how it addresses barriers, collects and acts on disaggregated data or extends protection, e.g. providing women's only spaces, ensuring all contracts, rules, communication are available in for women in local languages, etc. **Note:** The idea is to address barriers faced by vulnerable groups (here Women) to ensure that they have opportunities to overcome poverty.

Where to look for – COC, Human Rights Policy or equivalent, Supplier COC, Ethical sourcing, Sustainability reports, DEI reports, ESG disclosures, Annual reports, Company website (Ethics & Compliance, Diversity & Inclusion, or Human Resources section)

Keywords – Women, Vulnerable groups, marginalised, human rights policy commitments, safeguard mechanism, gender-specific impact assessments, and grievance mechanisms, Anti-discrimination procedures, DEI implementation, inclusive practices, grievance mechanisms, diversity advancement, equal opportunity enforcement, WEP signatory

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	<p>The company discloses ALL four elements in own operations:</p> <ol style="list-style-type: none"> 1. A clear human rights policy commitment addressing women’s rights/vulnerabilities. 2. A safeguard mechanism in place for women (e.g., protection from harassment, provision of safe working conditions, women-only spaces). 3. Gender-specific HR impact assessments conducted and disclosed (e.g., risks faced by women workers, data disaggregated by gender). 4. A dedicated grievance mechanism accessible and tailored to women (e.g., anonymous reporting channels, available in local languages).
<input type="checkbox"/> Partial	<p>The company discloses SOME but not all elements for Own operations. Examples include:</p> <ul style="list-style-type: none"> • Policy commitment exists but lacks detail on safeguards, assessments, or grievance mechanisms for vulnerable groups, including women. • Grievance mechanisms exist but no evidence of gender-specific adaptation or adaptation for other vulnerable groups. • Assessment or safeguards mentioned but are vague.



No

The company provides no meaningful disclosure on women-specific commitments, safeguards, assessments, or grievance mechanisms, OR only makes a generic reference to human rights without addressing women or other vulnerable groups.

NOTES –

Vulnerable or marginalised workers includes but NOT limited to **women, children**, disabled, migrant or temporary workers, etc. Any group of workers that has limited bargaining power, legal protections, or social visibility and is therefore more exposed to exploitation, unsafe conditions, or discrimination can be considered vulnerable or marginalised. Other examples are seasonal workers, agency-hired or subcontracted workers, indigenous peoples and tribal groups, LGBTQIA+ workers, workers in conflict-affected or high-risk areas, etc.

If there is a description of relevant human rights policy commitments, safeguard mechanism, specific impact assessments, and grievance mechanisms identifying **vulnerable or marginalised workers**

There is need for a clear description of how they implement it, through trainings for instance.



Good Example – Indicator example from Behind the Barcodes OGB, relevant to value chain workers: The company identifies potential barriers faced by different categories of workers and small-scale farmers - with a particular focus on women - in accessing grievance mechanisms and remedy and outlines how it addresses these barriers i.e. by allowing for low literacy.

OXF10_03: Description of relevant human rights policy commitments, safe-guard mechanism, gender-specific impact assessments, and grievance mechanisms identifying vulnerable or marginalised workers such as **women and vulnerable groups in Supply Chain**

What to look for – in Evidence

- Policy commitments explicitly covering vulnerable or marginalised workers including women **in Supply chain**.
- Safeguards mechanism/programs **in Supply chain** for vulnerable or marginalised workers, including women.
- HR Impact assessments: vulnerable or marginalised workers including women, for eg. accessibility audits, migrant worker risk mapping, contract labor assessments.
- Grievance mechanisms accessible to all.

Where to look for – COC, Human Rights Policy or equivalent, Supplier COC, Ethical sourcing, Sustainability reports, DEI reports, ESG disclosures, Annual reports, Company website (Ethics & Compliance, Diversity & Inclusion, or Human Resources section)


Keywords – Women, Vulnerable groups, marginalised, human rights policy commitments, safe-guard mechanism, gender-specific impact assessments, and grievance mechanisms, Anti-discrimination procedures, DEI implementation, inclusive practices, grievance mechanisms, diversity advancement, equal opportunity enforcement.

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	<p>The company discloses ALL four elements across its supply chain:</p> <ol style="list-style-type: none"> 1. A clear human rights policy commitment addressing the rights of vulnerable or marginalised workers including women. 2. A safeguard mechanism in place for vulnerable or marginalised workers including women. 3. Specific HR impact assessments conducted and disclosed for vulnerable and marginalised workers, including women (e.g., risk mapping for migrant labor exploitation, accessibility audits for disabled workers, analysis of treatment of temporary staff). 4. A dedicated grievance mechanism accessible and adapted for all (e.g., anonymous reporting channels, available in local languages, etc.).
<input type="checkbox"/> Partial	<p>The company discloses SOME but not all elements across its supply chain.</p>
<input type="checkbox"/> No	<p>The company provides no meaningful disclosure on commitments, safeguards, assessments, or grievance mechanisms tailored to vulnerable or marginalised workers including women OR only makes generic human rights references without identifying these groups.</p>

NOTES - Vulnerable or marginalised workers includes but NOT limited to **women, children, disabled, migrant or temporary workers, etc.** Any group of workers that has limited bargaining power, legal protections, or social visibility and is therefore more exposed to exploitation, unsafe conditions, or discrimination can be considered vulnerable or marginalised. Other examples are seasonal workers, agency-hired or subcontracted workers, indigenous peoples and tribal groups, LGBTQIA+ workers, workers in conflict-affected or high-risk areas, etc.

If there is a description of relevant human rights policy commitments, safe-guard mechanism, specific impact assessments, and grievance mechanisms identifying **vulnerable or marginalised workers**

 **Good Example** – Indicator example from Behind the Barcodes OGB, relevant to value chain workers: The company identifies potential barriers faced by different categories of workers and small-scale farmers - with a particular focus on women - in accessing grievance mechanisms and remedy and outlines how it addresses these barriers i.e. by allowing for low literacy.

OXF11 – Human Rights Due Diligence (Commitment to Respect Human Rights)

The company has a publicly available policy statement committing it to respect human rights which is approved by the highest governance body. Full compliance requires:

1. a **Human rights** policy in which the company commits to respect human rights.
2. it applies to the entire value chain: its own company, subsidiaries, direct and indirect business partners

OXF11_01: Disclosure of general approach in relation to respect for human rights including labour rights across the whole value chain

What to look for – Disclosure of general approach in relation to respect for human rights including labour rights, of people in its own workforce and supply chain.

Where to look for – Sustainability Report, Human Rights Policy, Code of Conduct, Annual Report – ESG/People/Workforce sections

Keywords – Human rights, labour rights, workforce rights, ILO conventions

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	The company has a human rights policy AND it applies across the full value chain
<input type="checkbox"/> Partial	The company has a human rights policy BUT it does not apply across the full value chain OR The company has a code of conduct AND/OR it does/ does not apply to the entire value chain OR The company only has a Supplier COC in which it commits to respect human rights
<input checked="" type="checkbox"/> No	The company does not have a HR policy OR code of conduct.

NOTES –

1. Check if the company addresses both broad human rights principles and specific labour rights practices (e.g., working hours, safety, wages) — this indicates a more robust and actionable approach.
2. Do not mark the datapoint as yes if such policy statements are available in AR/SR/IR. Capture the information and mark no. Provide analyst comment.
3. It is a “NO” if the wording is not strong enough. For instance, “the company strives”, “the company recognises”, “the company works towards”, does not apply as a

“Commitment”. This comment applies for all indicators based on the commitment of the company.

OXF11_06: Disclosure of whether and how policies are aligned with relevant internationally recognised instruments

What to look for – Look for explicit references to international human rights frameworks and standards that the company has adopted or aligned its policies with, including how these influence its practices.

Where to look for – Human Rights Policy, Code of Conduct, Sustainability Report, Annual Report – Governance or ESG sections

Keywords – UN Guiding Principles, UNGP, ILO Conventions, OECD Guidelines, International Bill of Human Rights, international human rights standards, policy alignment, human rights instruments

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	The company discloses that its human rights policies are aligned with one or more internationally recognized instruments (ILO, OECD, etc)
<input checked="" type="checkbox"/> No	The company does not reference any international human rights instruments or only makes vague or general statements without specifying alignment or implementation.

NOTES -

OXF11_02: Description of relevant human rights policy commitments relevant to own workforce

What to look for – Look for specific human rights policies or commitments that apply to the company’s employees, detailing principles like non-discrimination, fair wages, safe working conditions, and freedom of association.

Where to look for – Human Rights Policy, Code of Conduct, Sustainability Report, Annual Report – Ethics/People/Workforce sections

Keywords – Human rights, labour rights, workforce rights, ILO conventions

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	The company has a publicly available policy or code of conduct that explicitly commits to respecting human and clearly applies to its own workforce.

X No	The policy is missing, vague, or it only applies to suppliers or third parties, not the company's own operations.
-------------	---

OXF11_03: Description of relevant human rights policy commitments relevant to value chain workers and small scale farmers

What to look for – Look for explicit policy statements or supplier codes that outline the company's expectations and commitments to respect human rights of workers in its value chain, including suppliers, contractors, and outsourced labour and **small-scale farmers**.

Where to look for – Supplier Code of Conduct, Human Rights Policy, Sustainability Report, Responsible Sourcing Policy, Annual Report – Supply Chain/Sustainability sections, company website

Keywords – Supply chain human rights, value chain workers, responsible sourcing, supplier labour standards, third-party workers, human rights in supply chain, modern slavery, fair working conditions, ethical sourcing

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	The company has a publicly available policy that explicitly commits to respecting human rights across its value chain, and applying to suppliers, contractors, and other partners, AND expects its suppliers, contractors to commit to respect human rights policies
<input checked="" type="checkbox"/> No	The policy only applies to the company's own operations only.

NOTES - Look for whether the company extends its human rights commitments beyond direct employees to include contractors, suppliers, and other third-party labour.

OXF11_04: Description of relevant human rights policy commitments relevant to affected communities

What to look for – Look for policy statements or practices addressing the company's commitment to respect the rights of communities impacted by its operations, including land rights, indigenous rights, health, safety, and environmental concerns.

Where to look for – Human Rights Policy, Sustainability Report, Community Engagement Policy, ESG/Impact Assessment Reports, Annual Report – Stakeholder Engagement or Community sections

Keywords – Affected communities, indigenous rights, land rights, free prior and informed consent (FPIC), environmental justice, community health and safety, social impact

Outcome – QL

Scores	Evaluation Criteria
☑ Yes, high risk	For a high risk sector - The company has a publicly available policy that explicitly commits to respecting the human rights of affected communities AND it explicitly includes <i>right to land use, right to water, protection of natural resources and biodiversity</i> .
☑ Yes, low risk	For a low risk sector - The company has a publicly available policy that explicitly commits to respecting the human rights of affected communities with or without specific mention of these rights .
✗ No, high risk	For a high risk sector - The policy does not mention affected communities or only refers to general human rights without specific commitments or protections for these groups OR the rights are not explicitly included .
✗ No, low risk	For a low risk sector - The policy does not mention affected communities or only refers to general human rights without specific commitments or protections for these groups.

Where relevant (high risk sectors) - The company includes include right to land use, right to water, protection of natural resources and biodiversity.

Sector	Industry	HR/LR
Aerospace & Defence	Aeronautics and defence	High Risk
Apparel	Luxury goods	High Risk
Chemicals	Chemicals	High Risk
Communication Services	Telecommunications	Low Risk
Energy	Conglomerate	High Risk
Energy	Electric utility	High Risk
Energy	Energy production	High Risk
Energy	Environmental services	High Risk
Energy	Mining	High Risk
Energy	Oil & Gas	High Risk
Engineering & Construction	Conglomerate	High Risk
Engineering & Construction	Construction	High Risk
Engineering & Construction	Engineering	High Risk
Financials	Banks	High Risk
Financials	Diversified financials	High Risk
Financials	Insurance	High Risk
Food & Beverages	Agricultural Commodities	High Risk
Food & Beverages	Alcoholic Beverages	High Risk
Food & Beverages	Beverages	High Risk
Food & Beverages	Consumer goods	High Risk
Food & Beverages	Retail	High Risk

Food & Drug Stores	Food and Drug Stores	High Risk
Health Care	Medical Devices	High Risk
Health Care	Pharmaceuticals	High Risk
Hotels, Restaurants & Leisure	Food services	High Risk
Household Products	Consumer goods	High Risk
Household Products	Cosmetics	High Risk
Industrials	Conglomerate	High Risk
Industrials	Electrical equipment	High Risk
Materials	Building materials	High Risk
Materials	Chemicals	High Risk
Materials	Conglomerate	High Risk
Materials	Steel	High Risk
Motor Vehicles & Parts	Auto and truck parts	High Risk
Motor Vehicles & Parts	Automotive	High Risk
Motor Vehicles & Parts	Conglomerate	High Risk
Motor Vehicles & Parts	Heavy equipment	High Risk
Retailing	Furniture	High Risk
Retailing	Retail	High Risk
Technology	Computer Software	Low Risk
Technology	Consulting	Low Risk
Telecommunications	Telecommunications	High Risk
Tobacco	Consumer goods	High Risk
Transportation	Conglomerate	High Risk
Transportation	Delivery	High Risk
Transportation	Transport	High Risk
Wholesalers	Retail	High Risk

OXF49_01: The company maps its supply chain and discloses the list of suppliers

What to look for – A publicly available list of suppliers presents in the company’s supply chain

Where to look for – AR/IR/SR, any report specific to suppliers/supply chain, annexes, data book, Company website (including site search).

Keywords – Suppliers, supply chain, Tier 1, Tier 2, Tier 3

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	Publicly available list of suppliers in the company’s entire supply chain (Tier 1, 2 and 3)

Partial	Publicly available list of suppliers of part of the company's supply chain (eg. Only tier 1 or 2)
No	No publicly available list of suppliers of the company

OXF12 – Human Rights Due Diligence (Identifying Human Rights Risks and Impacts)

The company (a) describes the process(es) to identify its human rights risks and impacts in specific locations or activities covering its own operations and (b) describes the process(es) to identify its human rights risks and impacts in specific locations or activities through relevant business relationships.

In each case, a proper procedure should include conducting a HR Impact Assessment

OXF12_01: Description of process to identify, assess, prioritise and monitor potential and actual impacts on people and environment, informed by due diligence process

What to look for – Detailed explanation of how the company conducts human rights due diligence, including steps for identifying risks, assessing severity, prioritizing actions, and tracking outcomes over time.

Where to look for – Human Rights Policy, Sustainability Report, Due Diligence or Risk Management Disclosures, Annual Report – ESG or Risk sections

Keywords – Human rights due diligence, impact assessment, risk identification, salient human rights issues, prioritization, monitoring process, stakeholder engagement, environmental and social impacts

Outcome – QL

Scores	Evaluation Criteria
Yes	Process is detailed, covers full value chain, includes formal assessments and identification, prioritization (Identification + Prioritisation + whole value chain)
Partial	Generic process with limited scope; lacks detail on assessments, prioritization (i.e., one of the three elements is missing)
No	No due diligence process described or only vague references.

OXF12_02: The company conducts Human Rights Impact Assessment (HRIA) at least every 3 years

What to look for – The company conducts Human Rights Impact Assessment (HRIA) at least every 3 years

Where to look for – Human Rights Policy, Sustainability Report, Due Diligence or Risk Management Disclosures, Annual Report – ESG or Risk sections

Keywords – Human rights due diligence, impact assessment, risk identification, salient human rights issues, prioritization, monitoring process, stakeholder engagement, environmental and social impacts, HRIA, 3 years, etc.

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	The company conducts HRIA at least every 3 years or less.
<input type="checkbox"/> Partial	The company conducts HRIA every 4 or more years / conducts HRIA but further details are not disclosed.
<input type="checkbox"/> No	The company does not conduct HRIA or No information found.

OXF13 – Human Rights Due Diligence (Integrating and Acting on Human Rights Risks and Impacts)

The company:

(a) describes its global system to take action to prevent, mitigate or remediate its salient human rights issues, and this includes a description of how its global system applies to its supply chain

(b) provides an example of the specific conclusions reached and actions taken or to be taken on at least one of its salient human rights issues as a result of assessment processes in at least one of its activities/operations in the last three years, and

(c) has based many of its action plans on HRDD in meaningful engagement processes with affected and potentially affected stakeholders.

OXF13_01: Description of how process considers impacts with which undertaking is involved through own operations or as result of business relationships

What to look for – Evidence of how identified human rights risks are integrated into decision-

making and operational processes, along with actions taken to prevent, mitigate, or remediate those risks.

Where to look for – Human Rights Policy, Sustainability Report, Risk Management or Compliance Sections, Annual Report – ESG or Operations sections, due diligence disclosures

Keywords – Integrating human rights, risk mitigation, corrective actions, impact response, embedding due diligence, remediation

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	Specific description of actions for all prioritized adverse effects based on meaningful stakeholder engagement
<input type="checkbox"/> Partial High	Specific description of actions for all prioritized adverse effects but without stakeholder engagement
<input type="checkbox"/> Partial Low	Vague or incomplete description of actions for all prioritized adverse effects
<input checked="" type="checkbox"/> No	No description or little relevant information

NOTES –

1. Strong disclosures link risk identification to concrete actions—look for examples of policy changes, supplier engagement, training programs, or operational adjustments. Check if the company monitors effectiveness and updates its approach accordingly.
2. The wording should be more of a “performance” wording.

OXF13_02: Description of decision-making process and related internal control procedures

What to look for – Disclosures that explain how human rights-related decisions are made, including governance structures, escalation protocols, risk assessment integration, and internal controls that ensure accountability and oversight across operations and the supply chain.

Where to look for – Human rights policy, ESG/sustainability reports, annual reports, governance disclosures, company website (governance, ethics, or compliance section)

Keywords – Decision-making process, internal controls, human rights oversight, risk escalation, compliance procedures, salient human rights governance

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	Clear description of decision-making roles, procedures, and internal controls related to human rights impacts.
<input type="checkbox"/> Partial	Decision-making or governance is mentioned but lacks detail on roles or procedures.
<input checked="" type="checkbox"/> No	No meaningful description of decision-making or control mechanisms.

NOTES - Look for named committees, roles (e.g., Chief Human Rights Officer), or cross-functional teams responsible for human rights oversight. Also, check if the company links these processes to risk management or audit functions for stronger accountability.

OXF13_03: Description of extent to which and how process to identify, assess and manage impacts and risks is integrated into overall risk management process and used to evaluate overall risk profile and risk management processes

What to look for – Details on how human rights risk assessments are embedded within the company’s enterprise-wide risk management system, including how these risks influence strategic decisions, risk prioritization, and overall risk profile.

The indicator should include mention of conducting enhanced due diligence in/with high risk scenarios, clients or transactions. Mention of escalation procedure/process should be included for enhanced due diligence.

- The company explicitly describes how human rights risks are integrated into its enterprise-wide risk management system.
- Provides evidence that human rights risks are considered in strategic decision-making, prioritization, and overall risk profile.
- **Enhanced due diligence** (EDD) is mentioned for high-risk scenarios / clients / transactions / supply chains.
- An **escalation process**/procedure for high-risk findings is described (e.g., escalation to senior management, risk committee, or Board).

Where to look for – Human rights statement, modern slavery statement, defence policy, and any other human rights related documents such as ethical sourcing, home work, prison labour

Keywords – Salient human rights issues, risk assessment, mitigation actions, remediation, stakeholder engagement, supply chain responsibility, human rights due diligence, global system

Outcome – QL

Scores	Evaluation Criteria
☑ Yes	Enhanced due diligence is mentioned for high-risk scenarios AND the existence of an escalation process is mentioned
⊘ Partial	Integration but missing EDD and/or Escalation
✘ No	No integration with ERM, no EDD, no escalation

OXF13_04: Description of how process includes consultation with affected stakeholders to understand how they may be impacted and with external experts

What to look for – Information on how the company engages with affected individuals or communities and consults external experts to inform its understanding of human rights risks and impacts.

- Evidence of **consultation with affected stakeholders** (e.g., workers, communities, trade unions, employee committees).
- Engagement with **external experts** (e.g., NGOs, CSOs, academics, industry groups).
- Demonstration that the company goes beyond self-certification and includes **regular audits, stakeholder engagement, and worker voice mechanisms**.
- Indications of **enhanced scrutiny** for high-risk geographies, commodities, or suppliers (e.g., more frequent audits).

Where to look for – Stakeholder engagement reports, sustainability disclosures, human rights impact assessments, CSR reports, company website (community or governance section).

Keywords – Stakeholder consultation, affected communities, engagement process, external experts, human rights dialogue, participatory assessment, third-party consultation, inclusive due diligence, human rights impact assessments, supplier audits, verification, monitoring, participatory assessment, grievance channels, high-risk geographies, high-risk suppliers, enhanced due diligence, escalation, independent assessment, remediation.

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	The company shows a robust and multi-layered approach: it actively consults affected stakeholders (workers, unions, local communities) and external experts (NGOs, 'Human rights defenders', CSOs, industry bodies), combines this with audits and human rights impact assessments, and strengthens due diligence in high-risk areas. Worker voice is explicitly included, which ensures risks are identified from the ground up, not only through top-down checks.
<input type="checkbox"/> Partial	Limited or self-certification heavy, no real evidence of worker voice or expert input
<input type="checkbox"/> No	No stakeholder consultation, audits, or engagement beyond compliance language.

NOTES - Due diligence goes beyond self-certification and includes regular audits both for high risk and lower risk suppliers, high/low risk geographies AND stakeholder engagement with CSOs, trade unions, workers. More frequent audits for high-risk commodities or geographies should be mentioned. The inclusion of worker voice through worker consultations and/or with trade unions, employee organisations/ committees to complement audits and supplier self-assessments is the distinguishing factor. Worker voice will reflect actual challenges in supply chains.

The aim is to ensure that the due diligence process is robust and not overly reliant on one aspect of due diligence alone.

Good Example – Partial: Barclays (discloses that self-certification is required but does not disclose if audits or other checks are conducted outside of high-risk geographies, clients. Due diligence is passed on as responsibility of TPSP, not Barclays)

'All TPSPs are expected to self-monitor their compliance with our Barclays Code of Conduct for Third Party Service Providers and to inform us of any non-compliance. Barclays further requires that TPSPs key to Barclays operations are required to respond to an annual self-certification against our Barclays Code of Conduct for Third Party Service Providers. We also expect all TPSPs to provide us with responses to our reasonable requests for information about compliance with our Barclays Code of Conduct for Third Party Service Providers.

OXF47 – Human Rights-related cases/complaints

The company does not have any pending cases/complaints related to human rights-related based on (a) Business and Human Rights Resource Centre – HRD attacks & related news; (b) OECD Watch – Complaints database (mainly for banks) and (c) Good Job Violation Tracker for Europe

OXF47_01: Pending Cases or Human Rights-related complaints

What to look for – Capture information from the following third-party databases:

Source 1: [Business & Human Rights Resource Centre](#) (reference 1)

- Filter data by Company name
- Select HRD Attacks in Content type
- Select Date Range: 2022-01-01 to 2024-12-31
- Capture number of HRD attacks in evidence even if it is N/A.

Source 2: [Good Jobs Violation Tracker UK](#)

1. **Check employment-related offences** (reference 2)
 - Go to Advanced Search
 - Input Company name
 - Select employment-related offences in the OFFENCE GROUP
 - Select 2024, 2023, and 2022 in YEAR
2. **Check safety-related offences** (reference 3)
 - Go to Advanced Search
 - Input Company name
 - Select safety-related offences in the OFFENCE GROUP
 - Select 2024, 2023, and 2022 in YEAR
3. Capture the Violations found in the source text. Capture in sources text even if No Violation Tracker UK results found (**see image below**)

Source 3: [Good Jobs Violation Tracker Global](#) (Same steps as above) – (reference 4 and 5)

Source 4: [OECD Watch](#) (reference 6)

- Search for a complaint by entering the company name
- Capture data year-wise complaint information

Source Text: Compass Group

Business & Human Rights Resource Centre - 0 results were found for this company

...

No Violation Tracker UK results found. (employment-related)

No Violation Tracker UK results found. (safety-related)

...

4 Violation Tracker Global results found (employment-related)

Compass Group	Compass Group restaurants and foodservice	labor standards violation	2024	United States	\$80,849
Compass Group	Compass Group restaurants and foodservice	labor standards violation	2024	United States	\$10,000
Compass Group USA, Inc	Compass Group restaurants and foodservice	labor standards violation	2023	United States	\$8,716
COMPASS GROUP USA INC	Compass Group restaurants and foodservice	labor standards violation	2022	United States	\$5,000

...

5 Violation Tracker Global results found (safety-related)

COMPASS GROUP USA, INC.	Compass Group restaurants and foodservice	workplace safety or health violation	2023	United States	\$32,262
CANTEEN VENDING SERVICES	Compass Group restaurants and foodservice	workplace safety or health violation	2022	United States	\$18,000
COMPASS GROUP USA, INC.	Compass Group restaurants and foodservice	workplace safety or health violation	2023	United States	\$13,393
RESTAURANT ASSOCIATES	Compass Group restaurants and foodservice	workplace safety or health violation	2024	United States	\$9,679
COMPASS GROUP USA, INC.	Compass Group restaurants and foodservice	workplace safety or health violation	2024	United States	\$8,294

Analyst comment: Compass Group

No HRD attacks during 2022-2024. No complaints found on OECD watch.

Violation Tracker UK (safety-related) - https://violationtrackeruk.goodjobsfirst.org/summary.php?company=compass+group&reporting_date_parent_op=starts&offence_group=safety-related+offences&penalty_year%5B%5D=2024&penalty_year%5B%5D=2023&penalty_year%5B%5D=2022

Violation Tracker Global (employment-related) - https://violationtrackerglobal.goodjobsfirst.org/summary?company_op=starts&company=compass+group&reporting_date_parent_op=starts&reporting_date_parent=&penalty_op=%3E&penalty=&offense_group=employment-related+offences&penalty_year%5B%5D=2024&penalty_year%5B%5D=2023&penalty_year%5B%5D=2022&free_text=

Violation Tracker Global (safety-related) - https://violationtrackerglobal.goodjobsfirst.org/summary?company_op=starts&company=compass+group&reporting_date_parent_op=starts&reporting_date_parent=&penalty_op=%3E&penalty=&offense_group=safety-related+offences&penalty_year%5B%5D=2024&penalty_year%5B%5D=2023&penalty_year%5B%5D=2022&free_text=

Note:

- Reference 1 will be Business & Human Rights Resource Centre – [company name], Reference 2 will be Good Jobs Violation Tracker UK – [company name] (employment-related).
- All other 4 references will go in analyst comment (see image above)
- All these references will be the search result URL for the specific companies

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	Any complaints or violations found on any source
<input checked="" type="checkbox"/> No	No complaint or violation found on any source

OXF14 – Human Rights Due Diligence (Grievance Mechanisms for Workers, External Individuals and Communities)

The company indicates that it has one or more channel(s)/mechanism(s), or participates in a shared mechanism, accessible to all individuals and communities who may be adversely impacted by the company including workers, to raise complaints or concerns. Besides the existence of grievance mechanisms, the company has to report about its use and effectiveness: number of cases and complaints, how many and how they were settled, etc and the measures put in forth in terms of remediation, prevention and correction.

OXF14_01: Disclosure of general approach in relation to measures to provide and (or) enable remedy for human rights impacts

What to look for – Look for a description of how the company provides or facilitates remedies for human rights impacts, including grievance mechanisms, remediation processes, corrective actions, and preventive measures, ideally supported by examples or performance data.

Where to look for – Human rights policy, grievance mechanism disclosures, ESG/sustainability reports, annual reports, company website (ethics, compliance, or responsibility section)

Keywords – Remediation, grievance mechanism, corrective action, human rights remedy, complaint resolution, stakeholder redress, preventive measures, access to remedy

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	Complete information on use and measures taken AND it is accessible to ALL
<input checked="" type="checkbox"/> Partial High	Information is provided on the results of use (number of cases resolved, etc.), but not on the measures taken for remediation, prevention, correction.
<input checked="" type="checkbox"/> Partial Low	Grievance mechanisms can be used by anyone, but the results of use during the exercise are not reported.
<input checked="" type="checkbox"/> No	Grievance mechanisms cannot be used by any affected person

NOTES - Look for disclosures that include metrics (e.g., number of complaints received and resolved), stakeholder engagement in remediation, and whether the company evaluates the effectiveness of its mechanisms. Absence of follow-up or impact assessment may indicate weak implementation.

For instance, a hotline is not a good grievance mechanism.

OXF14_02: Disclosure of specific channels in place for direct and value chain workers to raise concerns or needs directly with undertaking and have them addressed

What to look for – Look for clear mention of grievance channels or mechanisms specifically available to direct employees and value chain workers, including how these channels are accessed and how concerns are addressed.

Where to look for – Human rights policy, grievance mechanism disclosures, ESG/sustainability reports, annual reports, company website (ethics, compliance, or responsibility section)

Keywords – Grievance mechanism, complaints channel, worker voice, whistleblower hotline, feedback system, value chain concerns, remediation process

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	The company explicitly discloses mechanisms for direct and value chain workers to raise concerns AND have ALL the following features: <ol style="list-style-type: none"> 1. free of cost 2. anonymous 3. 24/7 available 4. available in worker languages 5. Trusted 6. free of retaliation, reprisal, retribution, etc.
<input type="checkbox"/> Partial	The company explicitly discloses mechanisms for direct and/or value chain workers to raise concerns, BUT one or more of the six details are missing.
<input type="checkbox"/> No	No relevant information found

NOTES - Check whether the mechanism is being accessible in practice (e.g., available in local languages, anonymous, free of retaliation). "**Retaliation**" in the context of a grievance mechanism includes reprisal, retribution, punishment, revenge, vengeance, and recrimination, which refer to negative actions taken against someone for their complaint or perceived wrongdoing. Other terms like counteraction or payback also convey the idea of striking back.

For instance, a hotline is not a good grievance mechanism.

OXF14_03: Disclosure of how issues raised and addressed are tracked and monitored and how effectiveness of channels is ensured

What to look for – Look for information on how the company monitors grievance mechanisms, including tracking of complaints, resolution timelines, feedback loops, and any metrics or audits used to assess effectiveness.

Where to look for – Human rights policy, grievance mechanism disclosures, ESG/sustainability reports, annual reports, company website (ethics, compliance, or responsibility section)

Keywords – Grievance tracking, complaint monitoring, effectiveness review, feedback mechanism, audit of grievance systems, performance indicators

Outcome – QL

Scores	Evaluation Criteria
☑ Yes	The company provides details on how it tracks and monitors grievances and evaluates the effectiveness of its channels (e.g., KPIs, audits, feedback systems).
✗ No	No information is provided on tracking, monitoring, or evaluating grievance mechanisms.

NOTES - Look for whether the company uses third-party assessments or stakeholder feedback to validate the effectiveness of grievance mechanisms. Also, check if there's a commitment to continuous improvement based on monitoring outcomes.

OXF14_04: Third-party mechanisms are accessible to all stakeholders

What to look for – Look for disclosure of grievance or complaint mechanisms operated by independent third parties that are available to all categories of workers, including those in the supply chain.

Where to look for – Human rights policy, grievance mechanism disclosures, ESG/sustainability reports, annual reports, company website (ethics, compliance, or responsibility section)

Keywords – Third-party grievance, external complaint mechanism, independent reporting channel, worker hotline

Outcome – QL

Scores	Evaluation Criteria
--------	---------------------

<input checked="" type="checkbox"/> Yes	<p>The company has an independent third-party mechanism accessible to all workers AND have ALL the following features:</p> <ol style="list-style-type: none"> 1. free of cost 2. anonymous 3. 24/7 available 4. available in worker languages 5. Trusted 6. free of retaliation, reprisal, retribution, etc. 7. Accessible to all
<input type="radio"/> Partial	<p>The company has an independent third-party mechanism accessible to all workers, BUT one or more of the seven details are missing.</p>
<input checked="" type="checkbox"/> No	<p>No relevant information found</p>

NOTES - Check whether the third-party mechanism is described as independent, confidential, and trusted by workers. Also, look for partnerships with credible organizations or industry platforms that manage such channels. "**Retaliation**" in the context of a grievance mechanism includes reprisal, retribution, punishment, revenge, vengeance, and recrimination, which refer to negative actions taken against someone for their complaint or perceived wrongdoing. Other terms like counteraction or payback also convey the idea of striking back.

OXF15 – Board Diversity & Accountability (Board Independence)

Degree of independence of the Board

OXF15_01: Number of Board members identified as "independent" in the company's Annual Report

What to look for – Look for the total number of board members designated as "independent" by the company, typically listed alongside their profiles or in corporate governance disclosures.

Where to look for – Annual Report – Corporate Governance or Board of Directors section, Proxy Statement, Company Website – Leadership or Investor Relations section

Keywords – Independent director, board independence, non-executive director, board composition, governance structure, director status

Outcome – QT (number, %)

- a) In numbers (#)
- b) % of independent members of the Board

NOTES -

OXF15_02: Total number of Board members listed in the Annual Report

What to look for – Look for the total count of individuals serving on the board of directors, as listed in the company’s governance section or board composition table, including executive and non-executive members.

Where to look for – Annual Report – Corporate Governance or Board of Directors section, Proxy Statement, Company Website – Leadership or Investor Relations section

Keywords – Total board members, board composition, board structure, number of directors, board size, executive and non-executive directors

Outcome – QT (numbers)

a) Count (#)

NOTES –

Whom to count: Any voting member of the Board of directors,

- Chairman/Chairwoman
- Executive Directors
- Non-Executive Directors
- Independent Directors
- Employee representatives (Only in Germany, France, Sweden)

What not to count: Any non-voting member of the Board.

- Company Secretary (unless clearly identified as also being a board director)
- Alternates
- Emeritus, or Honorary Directors
- State or industry representatives
- Deputy Directors

OXF16 – Board Diversity & Accountability (Board Independence)

Separation of roles of Executive Director and President of the Board

OXF16_01: There is separation of roles of Executive Director and President of the Board

What to look for – Look for confirmation of whether the roles of the Chief Executive Officer (or Executive Director) and the Chairperson (President) of the Board are held by separate individuals, indicating role segregation for governance purposes.

Where to look for – Annual Report – Corporate Governance section, Board of Directors section, Proxy Statement, Company Website – Leadership or Governance pages

Keywords – Separation of roles, independent chair, CEO and Chair split, executive director vs board chair, dual role, combined CEO/Chairman, board leadership structure

Outcome – QL

- a) Name and Surname of Executive Director
- b) Name and Surname of President of the Board
- c) Gender of Executive Director
- d) Gender of President of the Board

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	There is separation of roles of Executive Director and President of the Board
<input type="checkbox"/> No	There is NO separation of roles

OXF17 – Board Diversity & Accountability (Board Oversight)

The board is responsible for overseeing the company's social and environmental performance (there is a board committee taking responsibility for the social and environmental performance of the company).

OXF17_01: Mention of a committee taking responsibility for the social and environmental performance of the company

What to look for – Look for references to a board-level or designated committee (e.g., ESG, Sustainability, CSR) tasked with overseeing the company’s social and environmental strategies, risks, and performance.

Where to look for – Annual Report – Corporate Governance or ESG sections, Committee Charters, Sustainability Report, Company Website – Governance or Leadership sections

Keywords – Sustainability committee, ESG committee, corporate responsibility committee, social and environmental oversight, board-level ESG responsibility, governance of sustainability

Outcome – QL

a) Name of the Committee

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	The company clearly identifies a board-level committee responsible for social and environmental performance, with defined roles or scope.
<input type="checkbox"/> No	No committee is mentioned, or responsibilities are vaguely described without clear oversight. Alternatively, a committee is identified as responsible for social and environmental performance, but it is NOT a board-level committee.

OXF18 – Board Diversity & Accountability (Board Diversity Performance)

Gender composition of the Board

OXF18_01: Number of Board members identified as women, as stated in the company's Annual Report

What to look for – Look for the number of women serving on the board of directors, either listed individually in the board composition section or summarized in gender diversity statistics.

Where to look for – Annual Report – Board of Directors or Corporate Governance section, Sustainability Report, Proxy Statement, Company Website – Leadership or ESG sections

Keywords – Women on board, female board members, board gender diversity, board composition, gender breakdown, diversity at board level

Outcome – QT (numbers)

a) Count (#)

NOTES – May involve calculation if the data is not directly disclosed.

OXF18_02: Total number of Board members listed in the Annual Report

What to look for – Look for the full count of individuals serving on the board of directors during the reporting period, including executive, non-executive, and independent directors.

Where to look for – Annual Report – Corporate Governance or Board of Directors section, Proxy Statement, Sustainability Report, Company Website – Leadership or Investor Relations sections

Keywords – Total board members, board composition, board structure, number of directors, board size, executive and non-executive directors

Outcome – QT (numbers)

a) Count (#)

OXF19 – Board Diversity & Accountability (Worker Representation)

Workers are represented on the company board and in any of the delegated committees (remunerations committee, appointments committee, etc.)

OXF19_01: The company has Worker’s representation on the Board

What to look for – Look for confirmation that one or more board seats are formally held by employees or worker representatives, either elected by the workforce or appointed through a labour-related process.

Where to look for – Annual Report – Corporate Governance or Board Composition section, Sustainability Report, Proxy Statement, Company Website – Governance or Leadership pages

Keywords – Worker representative, employee-elected board member, labour representative, codetermination, employee director, workforce voice on board, Employee representative

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	If workers are formally represented on the board or any delegated committee
<input checked="" type="checkbox"/> No	If there is no mention of worker representation or if representation is limited to advisory roles without voting rights

OXF19_02: Number of Board members representing the company's workers, as stated in the company's Annual Report

What to look for – Look for the specific number of board members identified as representing employees, often noted in board composition tables, footnotes, or governance disclosures.

Where to look for – Annual Report – Board Composition or Corporate Governance section, Proxy Statement, Sustainability Report, Company Website – Governance or Board of Directors page

Keywords – Worker representative, employee-elected board member, labour representative, codetermination, employee director, workforce voice on board, Employee representative

Outcome – QL

- a) Count (#)
- b) In %
- c) Total number of Board members listed in the Annual Report

OXF19_03: Total number of Board members listed in the Annual Report

What to look for – Look for the full count of individuals serving on the board of directors during the reporting period, including executive, non-executive, and independent directors.

Where to look for – Annual Report – Corporate Governance or Board of Directors section, Proxy Statement, Sustainability Report, Company Website – Leadership or Investor Relations sections

Keywords – Total board members, board composition, board structure, number of directors, board size, executive and non-executive directors

Outcome – QT (numbers)

- a) Count (#)

OXF20 – Management Committee Diversity

Gender composition of the Management Committee

OXF20_01: Number of members of the Management Committee (or COMEX) identified as women, as stated in the company's Annual Report

What to look for – The number of female executives listed as part of the Management Committee or Executive Team, typically disclosed in leadership or governance sections of the annual report.

Where to look for – Annual Report – Executive Leadership or Corporate Governance section, Sustainability Report, Company Website – Leadership or About Us pages

Keywords – Women, female, gender diversity, executive committee composition, senior leadership gender breakdown, management diversity

Outcome – QT (numbers)

a) Count (#)

NOTES – May involve calculation if the data is not directly disclosed.

OXF20_02: Total number of members of the Management Committee (or COMEX)

What to look for – The total number of individuals listed as part of the company's Management Committee or Executive Team, typically found in the leadership or governance section of the annual report.

Where to look for – Annual Report – Corporate Governance or Executive Leadership section, Sustainability Report, Company Website – Leadership, About Us, or Governance pages

Keywords – Management Committee, Executive Committee, COMEX, executive leadership, senior management, executive team composition.

Outcome – QT (numbers)

a) Count (#)

NOTES – May involve calculation if the data is not directly disclosed.

OXF48 – Investor/Shareholder's Influence

Major Shareholders or Significant shareholders

OXF48_01: Does the company disclose shareholders or investors holding 3% or more of company shares?

What to look for – The list of all shareholders/major shareholders or shareholding structure of the company.

Where to look for – Annual Report, Corporate Governance Report, Financial Report, etc

Keywords – Shareholders, shareholding, major shareholders, major shareholding, significant shareholders, significant shareholding, Share capital structure, Significant investors, Shareholding structure, Shareholder register, Ownership disclosure, Ownership structure, etc.

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	Full list of all shareholders or investors holding 3% or more of company shares is disclosed
<input type="checkbox"/> Partial	Partial or incomplete list disclosed, or names of shareholders/investors are not disclosed (e.g., disclosed only by geography or other aggregated categories)
<input type="checkbox"/> No	No such disclosure is available

OXF21 – Collective Bargaining (Commitment)

The company has a policy on workers right to organize and bargain collectively without interference or retaliation

OXF21_01: Existence of a workers right to organize and bargain collectively

What to look for – Look for a clear statement affirming the company's recognition of employees' rights to form or join trade unions and to bargain collectively, aligned with international labour standards.

Where to look for – Human Rights Policy, Code of Conduct, Sustainability Report, Annual Report – ESG or Workforce sections, Company Website – Ethics or Responsibility pages

Keywords – Freedom of association, right to organize, collective bargaining, trade union rights, ILO conventions, employee representation, labour rights

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	There is a policy commitment, and it covers the global operations.
<input type="checkbox"/> Partial	There is an absence of such a policy in one or more i.e., there is a policy commitment, and it DOES NOT cover the global operations.
<input checked="" type="checkbox"/> No	No commitment available

OXF21_02: Mention and development on how there is not an interference or retaliation

What to look for – Statements affirming that the company does not interfere with or retaliate against employees for exercising their rights to organize or bargain collectively, including protections against discrimination or disciplinary actions.

Where to look for – Human Rights Policy, Code of Conduct, Sustainability Report, Annual Report – Labor Practices or Governance sections, Company Website – Ethics or Employee Rights pages

Keywords – Non-interference, retaliation, freedom of association, protection from discrimination, labour rights, union activity, employee protections.

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	The company explicitly provides a clear statement that it does not interfere with or retaliate against workers who choose to unionize or engage in collective bargaining.
<input checked="" type="checkbox"/> No	No such mention or statement found

OXF21_03: Meeting ILO Standards on collective bargain and organization

What to look for – Look for confirmation that the company aligns its labour practices with International Labour Organization (ILO) Conventions, particularly Convention 87 (Freedom of Association) and Convention 98 (Right to Collective Bargaining).

Where to look for – Human Rights Policy, Code of Conduct, Sustainability Report, Annual Report – ESG or Labor Practices sections, Company Website – Ethics or Human Rights pages

Keywords – ILO standards, ILO Convention 87, ILO Convention 98, freedom of association, right to collective bargaining, international labour standards, ILO-aligned practices

Outcome – QL

Scores	Evaluation Criteria
--------	---------------------

<input checked="" type="checkbox"/> Yes	The company clearly states alignment with ILO standards on freedom of association and collective bargaining, with no restrictions or conditions.
<input checked="" type="checkbox"/> No	No mention of ILO standards, or the company places limitations on workers' rights to organize or bargain collectively.

OXF22 – Collective Bargaining (Coverage)

The company has a policy on workers right to organize and bargain collectively without interference or retaliation

OXF22_01: Number of countries in the company's supply chain where there is a collective agreement

What to look for – Disclosure of the number or list of countries within the company’s supply chain where workers are covered by collective bargaining agreements, or where such agreements are recognized.

Where to look for – Sustainability Report, Human Rights or Responsible Sourcing Policy, Annual Report – Supply Chain or Labor Practices sections, Company Website – ESG or Supplier Responsibility pages

Keywords – Collective agreement coverage, unionized suppliers, supply chain collective bargaining, labour rights by country, freedom of association in supply chain, union representation

Outcome – QT

- a) Count (#)
- b) In %

OXF22_02: Number of countries where collective rights are respected

What to look for – Look for the number of countries where the company acknowledges that collective rights—such as freedom of association and the right to bargain collectively—are respected for its workforce and/or supply chain workers.

Where to look for – Sustainability Report, Human Rights Policy, Code of Conduct, Annual Report – Labor Practices or Global Operations sections, Company Website – ESG or Responsible Business pages

Keywords – Freedom of association, collective bargaining rights, countries with labour rights, ILO compliance by country, labour standards, respect for union rights

Outcome – QT

- a) Count (#)

OXF22_03: Total number of countries where the company is present

What to look for – Look for the total number of countries in which the company operates directly or through subsidiaries, joint ventures, or supply chains, typically listed in the business overview or geographic footprint section.

Where to look for – Annual Report – Company Overview, Global Operations, or Business Model sections; Sustainability Report; Company Website – About Us or Global Presence pages

Keywords – Countries of operation, global presence, international footprint, operating countries, geographic reach, locations worldwide, market presence

Outcome – QT

- a) Count (#)

NOTES - If the exact number isn't stated, look for a map or list of countries in the company's global operations section—sometimes found in the "About Us" or "Our Presence" pages.

OXF23 – Non-standard Work Arrangements (NSWAs) (Performance) - % of part-time/total staff

The proportion of part-time/total staff among total employees of the company.

OXF23_01: Number of part-time employees in the company as stated in its Annual Report

What to look for – Look for the reported number of employees classified as part-time, often listed in workforce composition tables or employment data breakdowns.

Where to look for – Company annual reports, ESG or sustainability reports, investor presentations, official company website

Keywords – part-time employees, workforce composition, employment type, staff breakdown, human capital, labour structure

Outcome – QT

- a) Count (#)
- b) In %

OXF23_02: Total number of employees as stated in its Annual Report

What to look for – Look for the company’s total number of employees, typically provided as a consolidated figure across all locations and business units.

Where to look for – Annual Report – Human Capital, Business Overview, or Workforce section; Sustainability Report; Company Website – About Us, ESG, or Careers pages

Keywords – total employees, workforce size, headcount, number of employees, total staff, full-time equivalents (FTE)

Outcome – QT

- a) Count (#)

OXF24 – Non-standard Work Arrangements (NSWAs) (Performance) - % of contractors/total staff

The proportion of contractual staff among total employees of the company.

OXF24_01: Number of contractors in the company's workforce as stated in its Annual Report

What to look for – Look for the number of individuals classified as contractors, third-party workers, or contingent staff engaged in the company’s operations, often mentioned separately from direct employees.

Where to look for – Annual Report – Human Capital, Workforce or Operations section; Sustainability Report; Company Website – ESG or Labor Practices pages

Keywords – contract workers, contingent workforce, third-party staff, outsourced labour, non-payroll workers, temporary workers

Outcome – QT

- a) Count (#)
- b) In %

OXF24_02: Total number of employees as stated in its Annual Report

What to look for – Look for the company’s total number of employees, typically provided as a consolidated figure across all locations and business units.

Where to look for – Annual Report – Human Capital, Business Overview, or Workforce section; Sustainability Report; Company Website – About Us, ESG, or Careers pages

Keywords – total employees, workforce size, headcount, number of employees, total staff, full-time equivalents (FTE)

Outcome – QT

- a) Count (#)

OXF25 – Non-standard Work Arrangements (NSWAs) (Performance) - % temporary employees/total staff

The proportion of temporary employees among total employees of the company.

OXF25_01: Number of temporary employees in the company as stated in its Annual Report

What to look for – Look for the number of employees classified as temporary, short-term, or fixed-term workers, typically disclosed in workforce or employment breakdowns separate from permanent staff.

Where to look for – Annual Report – Human Capital, Workforce or Labor Practices section; Sustainability Report; Company Website – ESG or Careers pages

Keywords – temporary employees, fixed-term staff, short-term workers, non-permanent employees, contract duration, employment type

Outcome – QT

- a) Count (#)
- b) In %

OXF25_02: Total number of employees as stated in its Annual Report

What to look for – Look for the company’s total number of employees, typically provided as a consolidated figure across all locations and business units.

Where to look for – Annual Report – Human Capital, Business Overview, or Workforce section; Sustainability Report; Company Website – About Us, ESG, or Careers pages

Keywords – total employees, workforce size, headcount, number of employees, total staff, full-time equivalents (FTE)

Outcome – QT

- a) Count (#)

OXF26 – Political accountability (Disclosure)

The company discloses its political expenditures and activities

OXF26_01: Existence of a political expenditures data

What to look for – Look for disclosures that confirm whether the company makes political contributions, donations, or lobbying expenditures, and whether these are tracked, reported, and publicly available.

Where to look for – Annual Report – Governance or Risk Management sections; Sustainability Report; Company Website – Public Policy, Political Engagement, or ESG pages

Keywords – political contributions, political donations, lobbying expenses, public policy engagement, political expenditure, campaign finance, corporate political activity

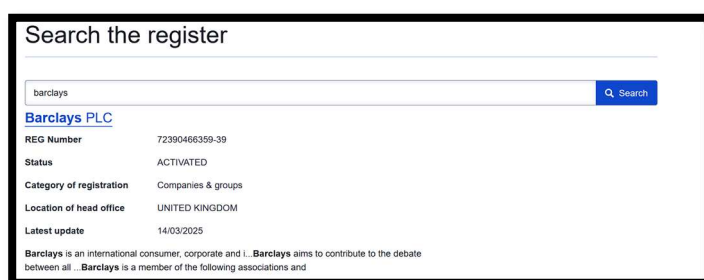
Outcome – QL

Scores	Evaluation Criteria
☑ Yes	The company fully discloses political expenditures (e.g., donations, lobbying, trade association fees).
✗ No	The company does not disclose any political expenditures.

NOTES – To include information on **lobbying expenditure** using the following **3rd party databases**. However, in the absence of specific political expenditure disclosures, the datapoint should still be marked No.

Source 1: [EU Transparency Register](#) (for all European companies)

a. Search with the company name and open its details



b. Capture the following in the source text (for whichever year the data is available on the register)

Profile of registrant

Organisation name: Barclays PLC

Financial data

Closed financial year: 01/2024 - 12/2024

Estimate of annual costs related to activities covered by the register: €1,000,000 - €1,249,999

organisation detail	
Profile of registrant	
Organisation name:	Barclays PLC
REG Number:	72390466359-39
Status:	Activated
Registration date:	03/08/2011 16:37:40

Financial data					
Closed financial year:	01/2024 - 12/2024				
EU grants for the most recent closed financial year:	N/A				
EU grants for the current financial year:	N/A				
Intermediaries in the most recent closed financial year:	<table border="1"> <thead> <tr> <th>Name</th> <th>Representation costs</th> </tr> </thead> <tbody> <tr> <td>FleishmanHillard</td> <td>€300,000 - €399,999</td> </tr> </tbody> </table>	Name	Representation costs	FleishmanHillard	€300,000 - €399,999
Name	Representation costs				
FleishmanHillard	€300,000 - €399,999				
Intermediaries in the current financial year:	<table border="1"> <thead> <tr> <th>Name</th> </tr> </thead> <tbody> <tr> <td>FleishmanHillard</td> </tr> </tbody> </table>	Name	FleishmanHillard		
Name					
FleishmanHillard					
Estimate of annual costs related to activities covered by the register:	€1,000,000 - €1,249,999				
Complementary information:	N/A				

Source 2: [German Lobbying Register](#) (for German companies along with source 1)

- Search with the company name (in Search term(s)) and open its details
- Capture the following in the source text (for whichever year the data is available on the register)

Continental AG

Annual financial expenditure in the area of interest representation:

Fiscal year: 01/24 to 12/24

270,001 to 280,000 euros

Information/Help	Register entries	Contents of the advocacy	contact	Registration/Login
<ul style="list-style-type: none"> Continental AG Description of the activity and naming of areas of interest and projects Concrete regulatory proposals Information about orders Grants or subsidies from public authorities Donations and other lifetime gifts Membership fees Annual financial statements/annual report Download register entry (PDF) Download register entry (JSON) Report content of this page (More information) 	<p>Continental AG Public limited company (AG)</p> <p>Registration number: R002074</p> <p>Last annual update: June 27, 2025</p> <p>Contact details: Address: Continental Plaza 1 30175 Hanover Germany</p> <p>Capital Representation: Neudiedische Kirchstraße 6 10117 Berlin Telephone number: +493020679580 Email address: office.berlin@conti.de</p> <p>Main sources of funding (in descending order): Fiscal year: 01/24 to 12/24 Economic activity</p> <p>Annual financial expenditure in the area of interest representation: Fiscal year: 01/24 to 12/24 270,001 to 280,000 euros</p> <p>Authorized representative(s):</p> <ol style="list-style-type: none"> Nikolai Setzer Christian Kötz 	<p>First entry: February 28, 2022</p> <p>Activity category: Other company</p> <p>Telephone number: +495119380</p> <p>Email addresses: mail_service@conti.de</p> <p>Websites: www.continental.com</p> <p>Full-time equivalent of persons employed in the field of interest representation: Fiscal year: 01/24 to 12/24 0.75</p>		

OXF26_02: Amount of political expenditures

What to look for – Identify the total monetary value of political expenditures made by the company, including direct and indirect contributions to political entities, campaigns, or advocacy groups.

Where to look for – Annual Report – Governance, Public Policy, or Risk sections; Sustainability Report; Company Website – Political Engagement, ESG, or Public Affairs pages

Keywords – political spending, lobbying expenses, campaign contributions, political donations, PAC contributions, trade association dues, disclosed political expenditure

Outcome – QT

- a) Amount as reported
- b) Scale (denomination)
- c) Unit

NOTES –

1. If the company breaks down the amount by category or region. Absence of declared spending may also be significant check for a “zero expenditure” statement or a policy prohibiting political donations.
2. If the company strictly prohibits any political expenditure and no other information is found, capture 0 in assessment value.

OXF27 – Political accountability (Policies)

The company has a detailed policy governing its political activities

OXF27_01: Existence of a policy governing its political activities

What to look for – Look for a formal policy or statement that outlines the company’s approach to political contributions, lobbying, and engagement with policymakers, including rules, approval processes, and compliance standards.

Where to look for – Company Website – Governance, Public Policy, or ESG sections; Annual Report – Corporate Governance or Risk Management; Sustainability Report

Keywords – political engagement policy, lobbying policy, public policy statement, political contributions policy, government affairs guidelines, advocacy policy, political activity governance

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	The company has a detailed policy governing its political activities
<input type="checkbox"/> Partial	The company makes general references to political activity or ethics policies, or general commitment in company reports, but does not have a detailed policy specifically governing political contributions, lobbying, or affiliations.
<input type="checkbox"/> No	No policy found

OXF29 – Antitrust (Competitive Behaviour)

The company does not have (a) any pending cases with the European Directorate-General for Competition, and the company does not have (b) competition related offenses with the European Directorate-General for Competition (since 2000)

OXF29_01: Pending cases or competition related offenses with the European Directorate -General for Competition or similar body at national level

What to look for – Capture information from the following third-party databases:

Source 1: [EU Competition Cases Database](#) (reference 1)

- Search for the company
- Select “Antitrust & Cartels” in policy area
- Within Antitrust / Cartels >> select **Antitrust**
- Select dates in web publication data, one-by-one for all three years based on financial year start and end dates of the company
- Capture the following in the Source Text for respective years:

Total Results:0

Case title or company name: Volkswagen

Antitrust / Cartels: Antitrust

Document date: from 01.01.2022 - to 31.12.2022



Note: The reference link will be the search result URL for the specific company

Source 2: [OECD Complaint Database](#) (reference 2)

- Search for the country the company is headquartered in in the Lead NCP box
- Filter Publication date for 2022 to 2024
- In the search results, see there's any case for the company
- If yes, capture the same in the source text, otherwise, just provide an analyst comment - No information found on OECD database.

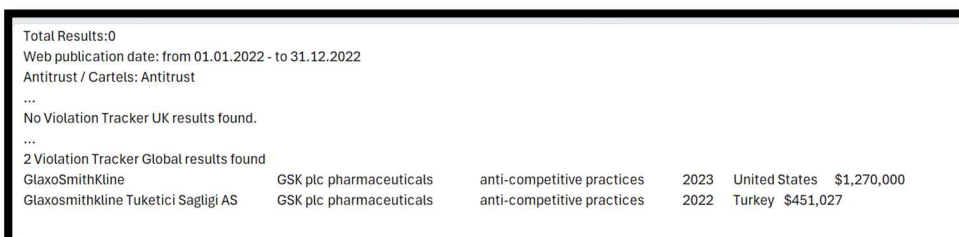
Source 3: [Good Jobs Violation Tracker UK](#)

Check competition-related offences (reference 3)

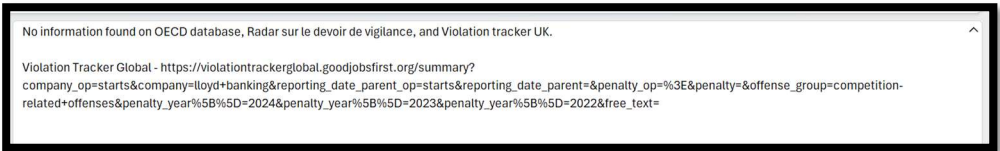
- Go to Advanced Search
 - Input Company name
 - Select competition-related offences in the OFFENCE GROUP
 - Select 2024, 2023, and 2022 in YEAR
1. Capture the Violations found in the source text. Capture in sources text even if No Violation Tracker UK results found (**see image below**)

Source 4: [Good Jobs Violation Tracker Global](#) (**Same steps as above**) – (reference 4)

Source Text:



Analyst comment:



Note:

- Reference 1 will be “OECE Complaint Database – [company name]”, Reference 2 will be Good Jobs Violation Tracker UK – [company name] (competition-related).
- All other references will go in analyst comment (see image above)
- All these references will be the search result URL for the specific companies

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	Any complaints, cases or violations found on any source
<input type="checkbox"/> No	No complaint, cases or violation found on any source

OXF30 – CEO Pay (Total Compensation Performance)

The amount the company's CEO earned in the past year. Includes base salary, bonus, value of stock awards, value of option awards, non-equity incentive plan compensation, change in pension value and deferred compensation earnings, and other compensation

OXF30_01_AV_A: CEO Remuneration Total

What to look for – Look for the total annual compensation of the CEO, including base salary, bonuses, stock awards, options, pension contributions, and any other financial or in-kind benefits.

Where to look for – Annual Report – Remuneration Report or Executive Compensation section; Proxy Statement; Company Website – Investor Relations or Governance pages

Keywords – CEO total compensation, executive pay, remuneration package, salary and bonuses, incentive pay, stock options, executive rewards

Outcome – QT

NOTES –

1. Check for a breakdown of fixed vs. variable components and whether the pay is performance-linked. Cross-verify the stated amount with footnotes or tables to confirm inclusion of all components. Total should always equate to sum of all pay components.

2. **Pension service costs** for German companies are not included in total CEO pay as they are not directly awarded. This is distinct from pension contributions, which are paid to the CEO and are therefore included in total CEO pay.

OXF30_01_AV_B: CEO remuneration - variable pluriannual

What to look for – Look for the long-term variable component of the CEO’s compensation, typically tied to multi-year performance plans such as stock awards, performance shares, or long-term incentive plans (LTIPs).

Where to look for – Annual Report – Remuneration Report or Executive Compensation section; Proxy Statement; Company Website – Investor Relations or Governance pages

Keywords – Long-term incentive, LTIP, variable remuneration, multi-year bonus, performance shares, deferred compensation, equity-based awards, pluriannual variable pay

Outcome – QT

OXF30_01_AV_C: CEO remuneration - variable annual

What to look for – Look for the short-term variable component of the CEO’s compensation, typically based on annual performance targets and paid as bonuses or incentives.

Where to look for – Annual Report – Remuneration Report or Executive Compensation section; Proxy Statement; Company Website – Investor Relations or Governance pages

Keywords – annual bonus, short-term incentive, variable pay, performance-based compensation, annual incentive plan, STI, bonus structure

Outcome – QT

OXF30_01_AV_D: CEO remuneration - shares

What to look for – Look for the portion of the CEO’s total compensation awarded in the form of company shares, including restricted stock units (RSUs), performance shares, or other equity grants.

Where to look for – Annual Report – Remuneration Report or Executive Compensation section; Proxy Statement; Company Website – Governance or Investor Relations pages

Keywords – share-based compensation, equity awards, stock grants, restricted shares, performance shares, RSUs, long-term equity incentive, CEO equity pay

Outcome – QT

NOTES - Pay attention to vesting conditions and performance criteria. Equity-based pay is a key tool for long-term alignment with shareholders—strong disclosures detail both the value and structure of these awards.

For France, always check if there are shares valuation remuneration vested, as it is often separate from the total remuneration disclosed in the AR. For example, for TotalEnergies URD 2025, you'll find 2 tables:

Table 1 (page 246-247):

TABLE SUMMARIZING THE COMPENSATION, OPTIONS AND SHARES ALLOCATED TO THE CHAIRMAN AND CHIEF EXECUTIVE OFFICER

SUMMARY OF THE COMPENSATION TO THE EXECUTIVE DIRECTOR

-0.9% on the allocated compensation in respect for the fiscal year 2024

Table 2 - AMF Position-recommendation - DOC-2021-02 (Appendix 2)

(€)	Fiscal year 2023		Fiscal year 2024	
	Amount allocated for the fiscal year	Amount paid during the fiscal year ^(a)	Amount allocated for the fiscal year	Amount paid during the fiscal year ^(a)
Patrick Pouyanné <i>Chairman and Chief Executive Officer</i>				
Fixed compensation	1,550,000	1,550,000	1,550,000	1,550,000
Annual variable compensation	2,741,950	2,731,875	2,698,550	2,741,950
Multi-year variable compensation	-	-	-	-
Extraordinary compensation	-	-	-	-
Compensation due to his directorship as a director	-	-	-	-
In-kind benefits ^(b)	75,457	75,457	78,514	78,514
Total	4,367,407	4,357,332	4,327,064	4,370,464
			-0.9%	

(a) Variable portion paid for the prior fiscal year.

(b) Company car and life insurance and health expense reimbursement plans paid for by the Corporation.

Table 2 (Page 246-247):

Table of allocated compensation in constant IFRS valuation⁽²⁾

(in €, except the number of shares)

	Fiscal year 2023	Fiscal year 2024	Variation
Patrick Pouyanné <i>Chairman and Chief Executive Officer</i>			
Compensation allocated in respect of the fiscal year (detailed in table 2)	4,367,407	4,327,064	-0.9%
Number of performance shares granted during the financial year	110,000	140,000	+27.3%
Valuation of the performance shares allocated with constant IFRS value	4,069,120	5,178,880	+27.3%
Compensation allocated in respect for the financial year with constant IFRS valuation	8,436,527	9,505,944	+12.7%

When it exists, check in this type/template table for all the components of the remuneration ALLOCATED/VESTED, table 3 (Page 248-249):

SUMMARY TABLE OF THE COMPONENTS OF THE COMPENSATION FOR MR. PATRICK POUYANNÉ, CHAIRMAN AND CHIEF EXECUTIVE OFFICER OF TotalEnergies SE, PAID DURING FISCAL YEAR 2024 OR ALLOCATED IN RESPECT OF THE SAME FISCAL YEAR

Components of compensation submitted for vote	Amount paid during fiscal year 2024	Amount allocated in respect of fiscal year 2024 or accounting valuation	Presentation
Fixed compensation	€1,550,000	€1,550,000 (amount paid in 2024)	Mr. Pouyanné's annual fixed compensation in his capacity as Chairman and Chief Executive Officer has been set by the Board of Directors at €1,550,000 (base salary) for fiscal year 2024. This fixed compensation represents 36% of the total cash compensation allocated in respect of fiscal year 2024 (i.e., excluding performance shares and benefit in kind).
Annual variable compensation	€2,741,950 (amount allocated in respect of fiscal year 2023 and paid in 2024)	€2,698,550 (amount allocated in respect of fiscal year 2024 and to be paid in 2025)	The variable portion of Mr. Pouyanné's compensation allocated in respect of fiscal year 2024 by virtue of his duties as Chairman and Chief Executive Officer has been set at €2,698,550. This corresponds to 174.1% (of a maximum of 180%) of his base salary, taking into account the results of the economic parameters and the evaluation of the personal contribution of the Chairman and Chief Executive Officer. This annual variable compensation corresponds to 64% of the total cash compensation allocated in respect of fiscal year 2024 (i.e., excluding performance shares and benefit in kind).
Multi-year variable compensation	n/a	n/a	The Board of Directors has not granted any multi-year or deferred variable compensation.
Compensation by virtue of directorship	n/a	n/a	Mr. Pouyanné does not receive compensation due to his directorship in TotalEnergies SE. Mr. Pouyanné does not receive compensation from companies TotalEnergies SE controls.

Chapter 4 / Report on corporate governance / Compensation for the administration and management bodies

Components of compensation submitted for vote	Amount paid during fiscal year 2024	Amount allocated in respect of fiscal year 2024 or accounting valuation	Presentation
Stock options (SO), performance shares (PS) or all other forms		SO: none PS: €6,252,960 ⁽¹⁾ (accounting valuation)	On May 24, 2024, Mr. Pouyanné was granted 140,000 existing shares of the Corporation pursuant to the authorization of the Corporation's Extraordinary Shareholders' Meeting on May 24, 2024 (twenty-third resolution) subject to the

OXF30_01_AV_E: CEO remuneration - other

What to look for – Look for additional compensation elements not classified as fixed salary, annual variable pay, or equity—such as pension contributions, signing bonuses, severance, personal benefits, fringe benefits or perquisites.

Where to look for – Annual Report – Remuneration Report or Executive Compensation section; Proxy Statement; Company Website – Investor Relations or Governance pages

Keywords – other compensation, pension benefits, perquisites, relocation allowance, signing bonus, non-cash benefits, severance, deferred compensation, fringe benefits

Outcome – QT

OXF30_01_AV_F: CEO remuneration - options

What to look for – Look for the portion of the CEO’s compensation granted as stock options, including the number of options awarded, their fair value, and any related performance or vesting conditions.

Where to look for – Annual Report – Remuneration Report or Executive Compensation section; Proxy Statement; Company Website – Governance or Investor Relations pages

Keywords – stock options, share options, option awards, equity-based compensation, CEO options, performance options, option grant value, long-term incentive plan

Outcome – QT

OXF30_01_AV_G: CEO remuneration - fixed

What to look for – Look for the CEO’s fixed compensation, typically referred to as base salary—this is the guaranteed annual pay not linked to performance

Where to look for – Annual Report – Remuneration Report or Executive Compensation section; Proxy Statement; Company Website – Governance or Investor Relations pages

Keywords – base salary, fixed pay, fixed remuneration, guaranteed compensation, annual salary, non-variable pay

Outcome – QT

OXF31 – CEO Pay (CEO-Worker Pay Ratio)

The ratio between the CEO's total compensation and median employee salary.

OXF31_01: CEO Pay Ratio

What to look for – Look for the ratio comparing the CEO’s total annual compensation to that of the median employee, often disclosed as a single numeric ratio (e.g., 200:1).

Where to look for – Annual Report – Remuneration Report or Compensation Disclosure section; Proxy Statement; Company Website – Investor Relations or ESG pages

Keywords – CEO pay ratio, median employee compensation, CEO-to-worker pay gap, pay equity ratio, executive pay ratio

Outcome – QT (xyz:1)

OXF31_02: Wages and Salaries

What to look for – Look for the total amount the company paid in wages and salaries to its workforce, typically disclosed in financial statements or workforce-related sections and the total Personnel cost.

Where to look for – Annual Report – Financial Statements (Notes to Accounts), Human Capital or Employee Costs section; Sustainability Report; Company Website – ESG or Workforce pages

Keywords – wages and salaries, employee compensation, payroll costs, staff costs, personnel expenses, labour cost, remuneration of employees

Outcome – QT

- a) Amount of Wages & Salaries
- b) Amount of Total Personnel Cost
- c) Scale (denomination)
- d) Unit

OXF31_03: Number of Employees

What to look for – Look for the total number of employees during the reporting period, typically disclosed as a headcount or full-time equivalents (FTE), and used to contextualize workforce pay and ratios.

Where to look for – Annual Report – Human Capital, Business Overview, or Financial Statements section; Sustainability Report; Company Website – ESG or About Us pages

Keywords – total employees, workforce size, employee headcount, number of staff, personnel, full-time equivalents (FTE)

Outcome – QT

OXF31_04: Median Employee Salary

What to look for – Look for the annual compensation of the median employee—defined as the midpoint in the company’s employee pay distribution, where half earn more and half earn less.

Median salary must be of all the workers and not limited to HQs.

Where to look for – Annual Report – Remuneration Report or Human Capital section; Proxy Statement (especially for U.S. companies); Sustainability Report; Company Website – ESG or Pay Equity pages


Keywords – median employee pay, median salary, workforce compensation, employee remuneration, pay distribution, average vs median pay

Outcome – QT

NOTES –

1. If the median salary isn't directly disclosed, check the CEO pay ratio section—companies often report both CEO pay, and median employee pay together. Be cautious of regional exclusions or sampling methods that may affect comparability.

2. Median salary must of all workers. CEO-worker pay gap disclosed by companies are often comparing with median of a limited scope of workers. We therefore need to check whether the ratio is based on all or part of workers.

 **Good Example** – CEO-worker pay ratios disclosed by **French companies** are often calculated with median salary of a limited scope of workers:

For instance, TotalEnergies shares this type of tables with ratios between CEO and part of workers but not a 100% of them:

Table of ratios pursuant to I. 6° and 7° of Article L. 22-10-9 of the French Commercial Code presented in accordance with Afep guidelines updated in February 2021

	2020	2021	2022	2023	2024
Change (%) in compensation paid to Mr. Patrick Pouyanné, Chairman and Chief Executive Officer of TotalEnergies SE (since December 19, 2015)	-20% ⁽²⁾	24%	31%	18%	25%
Information relating to the scope of TotalEnergies SE: 3,199 present employees on permanent contracts (CDI) and in activity (9% of employees in France and 19% of the payroll France) as of December 31, 2024					
Change (%) in average compensation of employees	-7% ⁽³⁾	2%	25%	10%	4%
Ratio compared to average compensation of employees	34	42	44	47	57
Change in ratio (%) relative to previous year	-14%	25%	5%	8%	21%
Ratio compared to median compensation of employees	42	51	54	61	72
Change in ratio (%) relative to previous year	-18%	25%	6%	12%	18%
Additional information on the enlarged scope representing at least 80% of the payroll of the employees France (20,261 employees) as of December 31, 2024					
Change (%) in average compensation of employees	-5% ⁽⁴⁾	1%	16%	5%	8%
Ratio compared to average compensation of employees	49	61	68	79	91
Change in ratio (%) relative to previous year	-16%	25%	13%	15%	16%
Ratio compared to median compensation of employees	61	77	86	101*	118
Change in ratio (%) relative to previous year	-19%	27%	12%	18%	17%
Performance of TotalEnergies SE (on a consolidated basis)					
Change in net income IFRS	-164%	42%**	28%	4%	-26%
Change in operating cash flow before working capital changes***	-40%	86%	57%	-21%	-17%

* This ratio would have been 92 based on the same fair value of performance shares as in 2022.

** Versus 2019.

*** Refer to the glossary for the definition and further information on alternative performance measures (Non-GAAP measures) and to point 1.9 of chapter 1 for reconciliation tables.

OXF32 – CEO Pay Linked to Stock Performance

% of CEO pay that is linked to stock performance

OXF32_01: Percentage of CEO Pay that is linked to stock performance

What to look for – Look for the proportion of the CEO’s total compensation, under both the STI and LTI, that is linked to stock/share performance measures, such as ROCE (return on capital employed), TSR (total shareholder return), EPS (earning per share), etc.

Where to look for – Annual Report, Remuneration Report or Executive Compensation section, Corporate Governance Report, Proxy Statement; Company Website – Governance or Investor Relations pages

Keywords – Annual Bonus, Short-term incentive, Long-term incentive, Variable compensation/remuneration, STI, LTI, pay for performance, ROCE, TSR, EPS, return on capital employed, return on tangible equity, total shareholder return, earning per share, etc.

Outcome – QT (most of the time calculated)

NOTES –

1. If no STI or LTI is linked with share performance, assume it to be 0 and capture the value accordingly.
2. **Calculation:** Percentage linked to share performance in CEO pay = (weightage of share performance metric in STI x % of STI in total CEO pay) + (weightage of share performance metric in LTI x % of LTI in total CEO pay)
3. **Eg.** CEO pay structure/mix is: Fixed pay (60%) + Annual bonus (15%) + LTI (25%)

Annual Bonus Structure:

ROCE – 30%

ESG – 20%

Free cash flow – 50%

LTI Structure:

Relative TSR – 50%

Cumulative free cash flow – 25%

ESG – 25%

Therefore,

Percentage linked to share performance in CEO pay = $((30\% \times 15\%) + (50\% \times 25\%)) \times 100 = 17\%$

Capture 17 in assessment value (mark it calculated instead of disclosed)

4. If the CEO pay structure or the targeted pay structure/mix of the CEO is not available, the required value **CANNOT** be calculated.

OXF32_02: CEO Remuneration Total

What to look for – Look for the CEO’s total annual compensation, which includes fixed salary, bonuses, stock options, equity awards, pension contributions, and other benefits.

Where to look for – Annual Report – Remuneration Report or Executive Compensation section; Proxy Statement; Company Website – Investor Relations or Corporate Governance pages

Keywords – CEO total compensation, executive remuneration, full pay package, annual compensation, salary and incentives, total pay

Outcome – QT

OXF33 – CEO Pay (Pay linked to ESG)

% of CEO pay that is linked to ESG performance

OXF33_01: Percentage of CEO Pay that is linked to ESG performance

What to look for – Look for the proportion of the CEO’s total compensation that is tied to environmental, social, or governance (ESG) metrics—such as emissions reduction, diversity targets, safety, or ethical performance, under both STI and LTI.

Where to look for – Annual Report – Remuneration Report or Executive Compensation section; Sustainability Report; Proxy Statement; Company Website – Governance or ESG pages

Keywords – ESG-linked pay, sustainability-linked compensation, CEO incentive tied to ESG, non-financial performance metrics, ESG performance targets, responsible remuneration

Outcome – QT (most of the time calculated)

NOTES –

1. If no STI or LTI is linked with ESG/Sustainability performance, assume it to be 0 and capture the value accordingly.
2. **Calculation:** Percentage linked to ESG performance in CEO pay = (weightage of ESG performance metric in STI x % of STI in total CEO pay) + (weightage of ESG performance metric in LTI x % of LTI in total CEO pay)
3. **Eg.** CEO pay structure/mix is: Fixed pay (60%) + Annual bonus (15%) + LTI (25%)

Annual Bonus Structure:

ROCE – 30%

ESG – 20%

Free cash flow – 50%

LTI Structure:

Relative TSR – 50%

Cumulative free cash flow – 25%

ESG – 25%

Therefore,

Percentage linked to ESG performance in CEO pay = $((20\%*15\%) + (25\%*25\%)) * 100 = 9.25 \%$

Capture 9.25 in assessment value (mark it calculated instead of disclosed)

4. If the CEO pay structure or the targeted pay structure of the CEO is not available, the required value **CANNOT** be calculated.

OXF34 – Top managers (Total compensation performance)

Average compensation received by members of the company's management committee in the past year. Includes base salary, bonus, value of stock awards, value of option awards, non-equity incentive plan compensation, change in pension value and deferred compensation earnings, and other compensation

OXF34_01_AV_A: All top managers or COMEX Remuneration Total

What to look for – Identify the total compensation awarded to all top executives or members of the COMEX (Executive Committee), including salary, bonuses, stock options, and other benefits.

Where to look for – Annual Report – Remuneration Report, Corporate Governance, or Executive Compensation section; Proxy Statement; Company Website – Governance or Investor Relations page

Keywords – executive team total compensation, COMEX pay, senior management remuneration, top management pay, total compensation of key executives, executive committee earnings

Outcome – QT

NOTES - Ensure the figure includes all relevant executives (not just the CEO) and covers the full reporting period. Some companies may disclose this as an aggregate number under "key management personnel" in financial notes. If not disclosed for all members on COMEX, mark as "Not disclosed".

OXF34_01_AV_B: All top managers or COMEX remuneration – variable pluriannual

What to look for – Identify the portion of total compensation for top executives or COMEX members that is tied to long-term performance metrics and awarded over multiple years, such as equity-based incentives or deferred bonuses.

Where to look for – Annual Report – Remuneration Report or Executive Compensation section; Proxy Statement; Company Website – Investor Relations or Corporate Governance pages

Keywords – long-term incentive, LTIP, variable multi-year pay, performance shares, equity-linked remuneration, deferred bonuses, pluriannual compensation

Outcome – QT

OXF34_01_AV_C: All top managers or COMEX remuneration – variable annual

What to look for – Identify the portion of annual compensation for top executives or COMEX members that is variable and tied to short-term performance metrics, such as annual bonuses or incentive payouts.

Where to look for – Annual Report – Remuneration Report or Executive Compensation section; Proxy Statement; Company Website – Governance or Investor Relations pages

Keywords – short-term incentive, annual bonus, variable pay, performance-related pay, STI, management incentives, annual performance remuneration

Outcome – QT

OXF34_01_AV_D: All top managers or COMEX remuneration – shares

What to look for – Look for the total value of compensation awarded in the form of shares (e.g., restricted stock, performance shares) to all members of the top management team or COMEX during the reporting period.

Where to look for – Annual Report – Remuneration Report or Executive Compensation section; Proxy Statement; Company Website – Governance or Investor Relations pages

Keywords – share-based compensation, equity awards, performance shares, restricted stock units (RSUs), stock grants, equity-linked pay, COMEX equity remuneration

Outcome – QT

OXF34_01_AV_E: All top managers or COMEX remuneration – other

What to look for – Look for all additional forms of compensation provided to top managers or

COMEX members that are not fixed salary, annual bonuses, or equity—such as pensions, allowances, severance, signing bonuses, or benefits-in-kind.

Where to look for – Annual Report – Remuneration Report or Notes to Financial Statements; Proxy Statement; Company Website – Governance or Investor Relations pages

Keywords – other compensation, perquisites, pension contributions, non-monetary benefits, signing bonuses, severance pay, benefits-in-kind, additional remuneration

Outcome – QT

OXF34_01_AV_F: All top managers or COMEX remuneration – options

What to look for – Look for all additional forms of compensation provided to top managers or COMEX members that are not fixed salary, annual bonuses, or equity—such as pensions, allowances, severance, signing bonuses, or benefits-in-kind.

Where to look for – Annual Report – Remuneration Report or Notes to Financial Statements; Proxy Statement; Company Website – Governance or Investor Relations pages

Keywords – other compensation, perquisites, pension contributions, non-monetary benefits, signing bonuses, severance pay, benefits-in-kind, additional remuneration

Outcome – QT

OXF34_01_AV_G: All top managers or COMEX remuneration – fixed

What to look for – Look for the total fixed (base) salary paid to all members of the top management team or COMEX during the reporting period, excluding bonuses, equity awards, or other variable components.

Where to look for – Annual Report – Remuneration Report or Executive Compensation section; Proxy Statement; Company Website – Governance or Investor Relations pages

Keywords – fixed pay, base salary, guaranteed compensation, annual salary, COMEX fixed remuneration, non-variable pay

Outcome – QT

OXF34_02: Number of top managers or COMEX

What to look for – Identify the total number of individuals serving on the company's Executive Committee (COMEX) or equivalent top management team, typically listed in governance or leadership sections.

Where to look for – Annual Report – Corporate Governance, Executive Compensation, or Remuneration Report sections; Sustainability Report; Company Website – Leadership or Governance pages

Keywords – top management, COMEX, executive committee, senior leadership team, number of executives, key management personnel

Outcome – QT

- a) Count (#)

OXF35 – Top managers (Top manager-Worker pay ratio)

[Auto calculated]

The ratio between the highest compensated employee/manager (CEO) and a median employee salary.

OXF35_01_AV_A: All top managers or COMEX Remuneration Total (in %)

OXF35_01_AV_B: All top managers or COMEX remuneration – variable pluriannual (in %)

OXF35_01_AV_C: All top managers or COMEX remuneration – variable annual (in %)

OXF35_01_AV_D: All top managers or COMEX remuneration – shares (in %)

OXF35_01_AV_E: All top managers or COMEX remuneration – other (in %)

OXF35_01_AV_F: All top managers or COMEX remuneration – options (in %)

OXF35_01_AV_G: All top managers or COMEX remuneration – fixed (in %)

.....

OXF35_02: Number of top managers or COMEX

What to look for – Look for the total number of executives who are considered part of the company’s top management team or COMEX during the reporting period, as this is needed to calculate average executive pay.

Where to look for – Annual Report – Corporate Governance, Remuneration, or Executive Management sections; Sustainability Report; Company Website – Leadership or Governance pages

Keywords – top management, COMEX, executive committee, senior executives, number of top managers, key management personnel (KMP)

Outcome – QT

OXF35_03: Wages and Salaries

What to look for – Look for the total amount the company paid in wages and salaries to its workforce, typically disclosed in financial statements or workforce-related sections and the total Personnel cost.

Where to look for – Annual Report – Financial Statements (Notes to Accounts), Human Capital or Employee Costs section; Sustainability Report; Company Website – ESG or Workforce pages

Keywords – wages and salaries, personnel expenses, staff costs, payroll, labour cost, employee compensation, workforce remuneration

Outcome – QT

- a) Amount of Wages & Salaries
- b) Amount of Total Personnel Cost
- c) Scale (denomination)
- d) Unit

OXF35_04: Number of employees

What to look for – Look for the total number of employees during the reporting period, typically disclosed as a headcount or full-time equivalents (FTE), and used to contextualize workforce pay and ratios.

Where to look for – Annual Report – Human Capital, Business Overview, or Financial Statements section; Sustainability Report; Company Website – ESG or About Us pages

Keywords – total employees, workforce size, employee headcount, number of staff, personnel, full-time equivalents (FTE)

Outcome – QT

OXF36 – Equity and Profit (Shareholder Payout)

Sum of the company's payments to shareholders, through dividends or share buybacks, as a % of the company's net profit

OXF36_01: Shareholder Payout Ratio

What to look for – Look for the shareholder payout ratio, typically calculated as total dividends paid and share buybacks divided by net income—showing the proportion of profits returned to shareholders.

Where to look for – Annual Report – Financial Highlights, Dividend Policy, or Financial Statements section; Company Website – Investor Relations or Shareholder Information pages

Keywords – payout ratio, dividend payout, shareholder returns, distribution of earnings, dividend policy, total payout ratio

Outcome – QT

NOTES -

1. Calculate it manually using:

$((Dividends\ paid + Share\ Buybacks)) / Net\ profit\ after\ Tax) * 100$

2. Shareholder payout ratio can exceed 100% or even 200%, as share buybacks and dividends may be paid out of reserves and exceed the net profit in certain cases.

OXF36_02: Net Profit after corporate tax (part of the group)

What to look for – Look for the consolidated net profit attributable to the parent company (group share) after corporate income tax, as stated in the income statement.

Where to look for – Annual Report – Consolidated Financial Statements, Income Statement, or Financial Highlights; Company Website – Investor Relations or Financials section

Keywords – net profit, net income, profit attributable to equity holders, consolidated profit, group net result, profit after tax

Outcome – QT

OXF36_03: Ordinary dividends

What to look for – Look for the total amount declared or paid as ordinary dividends to shareholders during the reporting period, excluding special or interim dividends unless otherwise specified.

Where to look for – Annual Report – Financial Statements (Statement of Changes in Equity or Notes), Dividend Policy section, or Financial Highlights; Company Website – Investor Relations or Dividend Information pages

Keywords – ordinary dividends, annual dividend, final dividend, dividend declared, dividend per share (DPS), shareholder distribution, dividend payment

Outcome – QT

OXF36_04: Share buybacks

What to look for – Look for the total value of shares repurchased by the company during the reporting period, either through open market operations or a formal buyback program.

Where to look for – Annual Report – Cash Flow Statement, Notes to Financial Statements (Equity or Treasury Shares), or Capital Allocation section; Company Website – Investor Relations or Press Releases

Keywords – share buyback, repurchase of shares, treasury stock, capital return, stock repurchase, reduction of share capital, buyback program

Outcome – QT

NOTES –

1. Buybacks may be presented as part of financing cash flows or changes in equity. Look for both the amount spent, and the number of shares repurchased to understand dilution impact.
2. Information on buyback of Treasury share is not eligible. Capture in Source test and leave assessment value blank.
3. Be careful to include share buybacks that are “**cancelled**”, not the shares that are bought to be distributed to employees (at least in France).

OXF37 – Equity and Profit (Effective Employee Ownership)

The company's employees own company equity through a good broad based employee ownership plan (ESOP or Employee Stock Ownership Plan, EOT, Worker Cooperatives, Community Ownership, and Steward Ownership). Participation in ownership must be inclusive, meaningful and free

OXF37_01: Numerical value of the part of company's equity owned by employees, as stated in the company's Annual Report

What to look for – Look for the total value or percentage of the company's share capital that is held directly or indirectly by employees, including through employee shareholding plans, stock options, or trusts.

Where to look for – Annual Report – Notes to Share Capital, Employee Shareholding, or Ownership Structure; Corporate Governance or Compensation section; Company Website – Investor Relations or ESG pages

Keywords – employee shareholding, employee equity ownership, staff share plan, ESOP, equity held by employees, internal shareholders, workforce ownership

Outcome – QL + QT

- a) % of company equities owned by employees = (no. of employee-owned shares / total no. of ordinary shares in the company) *100

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	The company discloses that the Employee owns a part of company's equity/share AND/OR the number/proportion of shares owned is disclosed
<input checked="" type="checkbox"/> No	Employee does NOT own any shares in company

OXF37_02: Numerical value of the company's total equity, as stated in the company's Annual Report

What to look for – The total number of ordinary shares of the company. Look for the capital structure and the number of shares within. Consider Ordinary shares only.

Where to look for – Annual Report – Consolidated Balance Sheet or Statement of Financial Position; Notes to Financial Statements (Equity section); Company Website – Investor Relations or Financial Reports pages

Keywords – total equity, shareholders' equity, net assets, total capital, equity attributable to shareholders, total stockholders' equity

Outcome – QT

OXF37_03: List of owners of the company, as stated in the company's Annual Report

What to look for – Look for a breakdown of the company's shareholders, typically listing major institutional investors, individual stakeholders, employee shareholding trusts, and any other significant ownership groups.

Where to look for – Annual Report – Shareholding Structure, Corporate Governance, or General Information section; Notes to Financial Statements; Company Website – Investor Relations or Shareholder Information pages

Keywords – major shareholders, ownership structure, list of shareholders, significant holdings, equity holders, institutional investors, employee shareholding

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	The company discloses its list of owners / shareholding structure
<input checked="" type="checkbox"/> No	No such disclosure

NOTES –

1. Look for disclosures on beneficial ownership or crossholdings. A separate mention of employee shareholding schemes or trusts can provide clarity on how much equity is effectively owned by the workforce.
2. If only major shareholders are disclosed, mark it as No, and provide analyst comment for the same.

OXF38 – Tax Practices (Policy on Responsible tax)

The company publishes a responsible tax policy statement

OXF38_01: Existence of a responsible tax policy statement in the company's publication

What to look for – Look for a formal statement or **group-level policy** outlining the company's approach to responsible tax practices, including principles like transparency, compliance, fair tax contribution, and alignment with business substance.

Where to look for – Annual Report – Tax Strategy, Governance, or Sustainability sections; Sustainability Report; Company Website – ESG, Governance, or Tax Policy pages

Keywords – responsible tax policy, tax transparency, tax governance, fair tax contribution, tax compliance, ethical tax, tax code of conduct, tax strategy statement

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	The company has a responsible tax policy that clearly states its approach is guided by principles such as contribution to society, sustainability, or responsibility, going beyond just compliance or tax risk management.
<input type="checkbox"/> No	The company does not have a responsible tax policy, or the available statements focus only on compliance or tax risk minimization, without mentioning broader goals like contribution, sustainability, or responsibility.

NOTES –

1. Mark No if only UK tax strategy is available.

OXF39 – Tax Practices (Tax Transparency)

The company is transparent about its tax payments where it operates (country-by-country reporting). Transparency means (a) the company publishes its country-by-country report and (b) it includes all jurisdictions where it has activities.

OXF39_01: Existence of a country-by-country reporting in the company's publication

What to look for – Look for a disclosure that provides a breakdown of key tax and financial information by country of operation—typically including revenues, profits, employees, and taxes paid.

Where to look for – Annual Report – Tax Strategy, Financial Review, or Notes to Accounts; Sustainability Report; Company Website – ESG, Tax, or Transparency pages

Keywords – country-by-country reporting, tax paid by country, tax jurisdiction data, revenue by geography, profit before tax per country, tax footprint

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	Data fully disaggregated by geography and is complete and/or including the five key data categories (revenues, profit, FTEs, subsidies and tax payments)
<input type="checkbox"/> Partial	Not fully complete data or not fully disaggregated (clubbed as ‘others’, ‘rest of the world’, etc)
<input type="checkbox"/> No	Insufficient data and/or not disaggregated by country

OXF40 – Tax Practices (No Tax Havens)

The company does not have any presence in tax havens. This means (a) the company reports all significant offshore subsidiaries and (b) the offshore subsidiaries are not designated as tax havens by Oxfam

OXF40_01: The company has presence in Oxfam-listed Tax Haven(s)

What to look for – Look for a full or partial list of the company’s subsidiaries or affiliated entities, especially those located in jurisdictions commonly considered tax havens as per **OXFAM** (listed below).

Where to look for – Annual Report – Notes to Consolidated Financial Statements (List of Subsidiaries), Corporate Structure, or Legal Entities section; Company Website – Investor Relations or Regulatory Filings

Keywords – list of subsidiaries, offshore entities, overseas affiliates, tax jurisdictions, group structure, legal entities, country of incorporation, tax haven presence

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	The company has presence in tax havens listed by Oxfam.
<input checked="" type="checkbox"/> No	The company does not have any presence in tax havens listed by Oxfam.

NOTES -

1. List of 15 countries identified as Tax haven by Oxfam:

Bermuda, Ireland, Bahamas, Cayman Islands, Luxembourg, Jersey, Netherlands, Curacao, Barbados, Switzerland, Hong Kong, Mauritius, Singapore, Cyprus, British Virgin Islands

OXF41 – Climate Action (Net Zero Disclosure)

The company discloses its scope 1, 2 and 3 emissions

OXF41_01: Numerical value of scope 1, as stated in the company's Annual Report

What to look for – Look for the total Scope 1 greenhouse gas (GHG) emissions, which cover direct emissions from owned or controlled sources, reported in metric tons of CO₂ equivalent.

Where to look for – Annual Report – Sustainability, Climate, or Environmental Performance section; ESG or Climate-related Disclosures; Sustainability Report; Company Website – ESG or Net Zero Commitments page

Keywords – Scope 1, direct GHG emissions, operational emissions, CO₂e, carbon footprint, climate disclosures, GHG inventory

Outcome – QT

NOTES - Check for consistency in units (e.g., metric tons CO₂e)

OXF41_02: Numerical value of scope 2, as stated in the company's Annual Report

What to look for – Look for the reported amount of Scope 2 GHG emissions—these are indirect emissions from the generation of purchased electricity, steam, heating, or cooling consumed by the company—expressed in metric tons of CO₂ equivalent.

Where to look for – Annual Report – Environmental or Sustainability section, Climate or Energy disclosures; Sustainability Report; Company Website – ESG or Net Zero pages

Keywords – Scope 2 emissions, indirect emissions, purchased electricity, CO₂e, market-based emissions, location-based emissions, GHG accounting

Outcome – QT

NOTES – There are separate cells for Market-Based, Location-Based and Unspecified. So, please fill the data accordingly.

OXF41_03: Numerical value of scope 3, as stated in the company's Annual Report

What to look for – Look for the total Scope 3 GHG emissions, which include all other indirect emissions that occur in the value chain—both upstream and downstream—reported in metric tons of CO₂ equivalent.

Where to look for – Annual Report – Sustainability or Climate-related Disclosures section; Sustainability Report; Company Website – ESG, Climate, or Net Zero pages

Keywords – Scope 3 emissions, value chain emissions, indirect emissions, supply chain emissions, CO₂e, upstream/downstream activities, GHG Protocol categories

Outcome – QT

NOTES - Scope 3 is often partially reported by category (e.g., business travel, purchased goods). Take note of which categories are included and whether estimates or primary data are used. Highlight if the company discloses Scope 3 in full or only partially.

OXF42 – Climate Action (Net Zero Commitment)

The company commits to the ambition to achieve net-zero GHG emissions in line with the SBTi corporate net zero standard. The standard means that the company should commit.

OXF42_01: Public commitment to achieve net-zero GHG emissions by 2050 or earlier, aligned with the SBTi Net-Zero Standard (1.5°C pathway)

What to look for – Look for a formal public commitment by the company to reach net-zero GHG emissions across its value chain (Scopes 1, 2, and 3) by 2050 or earlier, explicitly aligned with the Science Based Targets initiative (SBTi) Net-Zero Standard or a 1.5°C pathway.

Where to look for – Annual Report – Climate Strategy or CEO Letter; Sustainability Report; Company Website – Climate Action, ESG, or Net-Zero pages; SBTi website or databases

Keywords – net-zero commitment, 1.5°C aligned, SBTi-approved target, science-based target, GHG neutrality, full-scope emissions, SBTi net-zero standard

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	The company publicly commit to achieving net-zero GHG emissions by 2050 or earlier, in alignment with limiting warming to 1.5°C, as per the SBTi Net-Zero Standard
<input checked="" type="checkbox"/> No	The company has NOT made a public commitment to achieve net-zero GHG emissions by 2050 or earlier, or the commitment is NOT aligned with the SBTi Net-Zero Standard or the 1.5°C pathway.

NOTES - Verify whether the target is officially validated by the SBTi or just “committed.” Strong disclosures will clarify target scope, timeline, interim milestones, and inclusion of Scope 3 emissions.

OXF42_02: Existence of science-based GHG reduction targets covering Scope 1, 2, and material Scope 3 emissions, with base year, target year, and % reduction disclosed

What to look for – Look for clearly defined science-based GHG emissions reduction targets that cover Scope 1 and 2 and include material Scope 3 categories—along with disclosure of the base year, target year, and percentage reduction.

Where to look for – Annual Report – Sustainability or Climate Strategy section; Sustainability Report; Company Website – ESG, Net-Zero, or Climate Action pages; SBTi database (for verification)

Keywords – science-based targets, GHG reduction goals, SBTi, base year, target year, Scope 1 2 3 emissions, % reduction, 1.5°C pathway, emission intensity targets

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	Complete disclosure (all scopes, timeline & reduction %)
<input type="checkbox"/> Partial	Incomplete scope or missing target years/reduction
<input checked="" type="checkbox"/> No	No or insufficient information available

NOTES - Ensure targets are time-bound and absolute (not just intensity-based), and that Scope 3 is included where material. Companies aligned with the SBTi often provide structured disclosures with validation status and tracking progress.

OXF42_03: Existence of formal climate risk assessment identifying physical and/or transition risks

What to look for – Look for a documented climate risk assessment that identifies both physical risks (e.g. floods, heatwaves) and transition risks (e.g. policy changes, carbon pricing) to the company’s operations or value chain.

Where to look for – Annual Report – Risk Management or TCFD section; Sustainability Report; Company Website – ESG, Climate Risk, or Governance pages

Keywords – climate risk assessment, physical risks, transition risks, TCFD disclosure, scenario analysis, climate-related risks, resilience strategy

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	Identifies both physical and transition risks
<input type="checkbox"/> Partial	Mentions climate risks, but the assessment is generic OR only one type of risk is described
<input checked="" type="checkbox"/> No	No or insufficient information available

NOTES - Strong disclosures align with the **TCFD** framework and may include scenario planning. Note whether risks are quantified, time-bound (short/medium/long-term), and integrated into the overall enterprise risk management (ERM) process.

OXF42_04: Assignment of senior management or board-level responsibility for climate targets and risk oversight

What to look for – Look for evidence that a senior executive, committee, or board member is formally tasked with overseeing climate-related targets, performance, and risk management.

Where to look for – Annual Report – Corporate Governance, Sustainability, or TCFD section; Sustainability Report; Company Website – Governance or ESG pages

Keywords – climate oversight, board responsibility, ESG governance, sustainability committee, climate accountability, executive responsibility, climate governance

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	Climate responsibility is explicitly assigned to board-level committee or a named executive-level role (e.g., Chief Sustainability Officer, CEO, Board ESG Committee)
<input checked="" type="checkbox"/> No	No or insufficient information available

OXF42_05: Existence of an ambitious process to support suppliers in attaining net zero

What to look for – Look for the information that the company is working with its suppliers to attain net zero.

Where to look for – Annual Report – Climate Strategy, ESG, or Just Transition sections; Sustainability Report; Company Website – ESG, Climate Action, or Just Transition pages

Keywords – just transition, climate transition plan, net-zero roadmap, low-carbon strategy, social impact of climate action, worker reskilling, community engagement, fair transition, SBTi, beyond value chain, suppliers, support

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	The company publicly discloses on a long-term engagement, shared action plan backed up by funds and clear milestones to work with suppliers to attain Net zero. AND/OR The company has made a public commitment that it will make a “Beyond Value Chain Mitigation (BVCM)” pledge. (https://sciencebasedtargets.org/beyond-value-chain-mitigation)
<input type="checkbox"/> Partial	The company describes how they support their suppliers in moving to net zero and it is limited to training, guidelines, knowledge sharing, climate action in procurement, etc., but the criteria above are not met.
<input checked="" type="checkbox"/> No	There is no public disclosure, or the disclosure is too vague or general to assess its support to suppliers.

OXF43 – Climate Action (Net Zero Performance)

% and absolute value of reduction in GHG emissions (scope 1,2,3) (year-by-year)

OXF43_01: Percentage change in Scope 1 (year-on-year)

What to look for – Look for the year-over-year percentage increase or decrease in Scope 1 greenhouse gas emissions, comparing the most recent reporting year to the previous one, typically expressed in metric tons of CO₂e.

Where to look for – Annual Report – Sustainability, Environmental Data, or Climate Disclosures section; Sustainability Report; Company Website – ESG or Performance Metrics pages

Keywords – Scope 1 emissions change, year-on-year emissions, GHG reduction, direct emissions trend, CO₂e variation, emissions trajectory

Outcome – QT

NOTES - If not explicitly stated, calculate it using:

$[(\text{Current Year Scope 1} - \text{Previous Year Scope 1}) \div \text{Previous Year Scope 1}] \times 100$

Ensure consistency in measurement boundaries and methodology between years (e.g., location changes, acquisition impacts).

OXF43_02: Percentage change in Scope 2 (year-on-year)

What to look for – Look for the year-over-year percentage change in Scope 2 GHG emissions—those from purchased electricity, steam, heat, or cooling—comparing the latest reporting year to the previous one, in metric tons of CO₂e.

Where to look for – Annual Report – Environmental, Sustainability, or Climate Metrics section; Sustainability Report; Company Website – ESG or Performance Data pages

Keywords – Scope 2 emissions change, year-on-year variation, electricity-related emissions, indirect emissions, GHG performance, CO₂e reduction, market-based vs. location-based

Outcome – QT

NOTES - Calculate the % change if not provided using:

$[(\text{Current Year} - \text{Previous Year}) \div \text{Previous Year}] \times 100$

Be consistent in method (market- or location-based) year-over-year to ensure comparability.

OXF43_03: Percentage change in Scope 3 (year-on-year)

What to look for – Look for the year-over-year percentage change in Scope 3 greenhouse gas emissions, which include indirect emissions across the value chain—such as purchased goods, transport, business travel, and product use.

Where to look for – Annual Report – Climate, Sustainability, or GHG Emissions section; Sustainability Report; Company Website – ESG or Environmental Data pages

Keywords – Scope 3 emissions change, value chain emissions, upstream/downstream emissions, indirect emissions, year-on-year CO₂e variation, GHG inventory trend

Outcome – QT

NOTES - Use this formula if not disclosed:

$[(\text{Current Year Scope 3} - \text{Previous Year Scope 3}) \div \text{Previous Year Scope 3}] \times 100$

Be aware that Scope 3 often includes only selected categories—note any material exclusions or estimation methods that may affect year-on-year comparability.

OXF43_04: Absolute change in value of scope 1 reduction, year by year

What to look for – Look for the absolute decrease in Scope 1 greenhouse gas emissions (in metric tons of CO₂e) compared to the previous year—focusing on the actual volume reduced, not the percentage change.

Where to look for – Annual Report – Climate, Environmental Performance, or GHG Emissions section; Sustainability Report; Company Website – ESG or Climate Metrics pages

Keywords – Scope 1 emissions reduction, GHG reduction, direct emissions cut, CO₂e decrease, absolute emissions decline, year-on-year change in Scope 1

Outcome – QT

NOTES - If not disclosed directly, subtract the current year's Scope 1 value from the previous year's:

Current Year Scope 1 - Previous Year Scope 1

Always ensure unit consistency (metric tons CO₂e) and that changes in reporting boundary or methodology are accounted for.

OXF43_05: Absolute change in value of scope 2 reduction, year by year

What to look for – Look for the absolute decrease in Scope 2 GHG emissions—indirect emissions from purchased electricity, steam, heat, or cooling—expressed in metric tons of CO₂e, comparing the current year to the previous one.

Where to look for – Annual Report – Sustainability, Environmental Performance, or GHG Emissions section; Sustainability Report; Company Website – ESG or Climate Metrics pages

Keywords – Scope 2 emissions reduction, CO₂e decrease, indirect emissions cut, electricity-related GHG reduction, absolute emissions decline

Outcome – QT

NOTES - Calculate manually if needed:

Current Year Scope 2 – Previous Year Scope 2

Be consistent in using either market-based or location-based figures and confirm whether operational changes or methodology updates affect comparability.

OXF43_06: Absolute change in value of scope 3 reduction, year by year

What to look for – Look for the absolute decrease in Scope 3 greenhouse gas emissions—covering indirect emissions across the value chain—measured in metric tons of CO₂e, comparing the current reporting year with the previous one.

Where to look for – Annual Report – Climate, GHG Emissions, or Sustainability section; Sustainability Report; Company Website – ESG, Climate, or Environmental Performance pages

Keywords – Scope 3 emissions reduction, CO₂e decrease, value chain emissions cut, indirect emissions, upstream/downstream GHG drop, absolute change

Outcome – QT

NOTES - Calculate using:

Current Year Scope 2 – Previous Year Scope 2

Note which Scope 3 categories are included and be cautious of year-to-year changes in boundary or estimation methods that could affect accuracy.

OXF44 – Just Transition Plan

The company discloses a public document that outlines how it will deal with the socio-economic impacts of transitioning to a zero-carbon economy. This should include the presence of transparent and scalable investments in the low carbon transition, transformational action to cut GHG emissions, reducing inequality impact, include compatibility with the Paris Agreement and its 1,5°C goal, as well as clear engagements of protection rights for workers.

OXF44_01: Existence of an ambitious transition plan published by the company

What to look for – Look for a publicly available transition plan that outlines how the company intends to decarbonize in line with climate goals while addressing social impacts—particularly on workers, communities, and supply chains.

Where to look for – Annual Report – Climate Strategy, ESG, or Just Transition sections; Sustainability Report; Company Website – ESG, Climate Action, or Just Transition pages

Keywords – just transition, climate transition plan, net-zero roadmap, low-carbon strategy, social impact of climate action, worker reskilling, community engagement, fair transition

Outcome – QL

Scores	Evaluation Criteria
<input checked="" type="checkbox"/> Yes	<p>The company publicly discloses a comprehensive Just Transition plan that includes:</p> <ul style="list-style-type: none"> - Investments in low-carbon transition (scalable and transparent) - Clear emission reduction actions aligned with Paris Agreement / 1.5°C goal - Measures to mitigate socio-economic impacts (e.g., retraining, reskilling) - Commitment to protect workers’ rights (e.g., collective bargaining, fair treatment) - Steps to reduce inequality during the transition
<input type="checkbox"/> Partial	<p>The company discloses some elements of a Just Transition plan, but:</p> <ul style="list-style-type: none"> - It lacks alignment with the 1.5°C target, or - It addresses only one or two areas (e.g., emissions but not worker rights or inequality), or - Lacks clear timelines, funding plans, or worker protection details
<input type="checkbox"/> No	<p>There is no public disclosure of a Just Transition plan, or the disclosure is too vague or general to assess alignment with climate and social goals.</p>

OXF45 – Just Transition (Green Investment)

The company dedicates a significant part of its investments (CAPEX) to the transformation of its business to attain Net Zero

OXF45_01: Total sum of CAPEX

What to look for – Look for the company’s total capital expenditure (CAPEX) for the reporting year, which includes investments in assets, infrastructure, and technologies—regardless of whether they are classified as green. Refer to EU Taxonomy table.

Where to look for – Annual Report – Financial Statements (Cash Flow Statement), Notes to Accounts, or Management Discussion & Analysis; Company Website – Investor Relations or Financial Highlights

Keywords – capital expenditure, CAPEX, total investment, investments in property, plant and equipment, capital spending, capital allocation

Outcome – QT

NOTES -

1. Use total CAPEX as the baseline to assess what portion is allocated toward green or low-carbon initiatives. If disclosed separately, compare with green CAPEX to evaluate alignment with transition strategies.
2. Data not extracted for this indicator for financial sector companies (banks, insurance companies, asset managers, etc.). It's therefore "blank".

OXF45_02: Part of CAPEX aligned with EU Taxonomy dedicated to green investments according to

What to look for – Look for the portion of the company’s capital expenditure (CAPEX) that is classified as aligned with the EU Taxonomy—specifically investments in environmentally sustainable economic activities, as defined by the regulation.

A.1. Environmentally sustainable activities (Taxonomy-aligned)

Where to look for – Annual Report – EU Taxonomy or Sustainable Finance Disclosure section; Sustainability Report; Company Website – ESG, Green Finance, or EU Taxonomy pages

Keywords – EU Taxonomy-aligned CAPEX, green investment, sustainable CAPEX, taxonomy-compliant investment, environmentally sustainable activities, low-carbon investment, A.1

Outcome – QT

NOTES - Verify that the disclosure differentiates between eligible and aligned CAPEX. Aligned investments must meet technical screening criteria and do no significant harm (DNSH) across environmental objectives.

Data not extracted for this indicator for financial sector companies (banks, insurance companies, asset managers, etc.). It's therefore "blank".

OXF46 – Just Transition (Green Investment)

The ratio between the green investments and the dividends paid to shareholders. The company pays more or less its shareholders than invests to attain Net Zero (green CAPEX)

OXF46_01: Ordinary dividends

[Auto - filled]

OXF46_02: Share buybacks

[Auto - filled]

OXF46_03: Amount of CAPEX aligned with EU Taxonomy dedicated to green investments

What to look for – Look for the absolute monetary value of capital expenditure (CAPEX) that the company reports as **aligned** with the EU Taxonomy—i.e., invested in environmentally sustainable activities that meet the regulation’s technical screening criteria.

A.1. Environmentally sustainable activities (Taxonomy-aligned)

Where to look for – Annual Report – EU Taxonomy Disclosure, Sustainability or Green Investment sections; Sustainability Report; Company Website – ESG or EU Taxonomy alignment pages

Keywords – EU Taxonomy-aligned CAPEX, green CAPEX, sustainable investment, taxonomy-compliant expenditure, eligible and aligned investment, green asset allocation, A.1

Outcome – QT

NOTES - Ensure the amount reported reflects **aligned**, not just **eligible**, activities. Strong disclosures break this down by taxonomy objective (e.g., climate mitigation) and may provide a percentage of total CAPEX alongside the absolute figure.

Data not extracted for this indicator for financial sector companies (banks, insurance companies, asset managers, etc.). It's therefore "blank".