

As investors, on a comply or explain basis, we expect each company to:

<i>Framework indicator</i>		<i>Supporting notes (also see 'definitions' on p.5)</i>	<i>Antecedentsⁱ</i>
POLICY & COMMITMENT			
1.	Make a public commitment to align all of its climate change lobbying with the goal of restricting global temperature rise to 1.5°C above pre-industrial levels	A commitment to lobby in support of a managed transition in line with the goal of restricting global temperature rise to 1.5°C above pre-industrial levels is the expected baseline corporate response to the risks of climate change.	Transparency International: Principle 6 (2015) PRI, IIGCC, Ceres investor expectations (2015, 2018, 2020) Business Ambition for 1.5°C (2019) AAA Framework: Advocate (2020) Ceres Blueprint: Act (2020) CA100+ Benchmark 7.1a (2021)
2.	Apply the scope of this commitment to all of its subsidiaries and business areas, and all operational jurisdictions	All of the company's climate change-related lobbying activities – across all geographies, and all operations – should support the goal of restricting global temperature rise to 1.5°C above pre-industrial levels.	Transparency International: Principle 7 (2015) Business Ambition for 1.5°C (2019) CA100+ Benchmark 7.2a (2021)
3.	Publicly commit to taking steps to ensure that the associations, alliances and coalitions of which it is a member conduct their climate change lobbying in line with the goal of restricting global temperature rise to 1.5°C above pre-industrial levels	Collective efforts – whether through formal associations or informal groupings – have a powerful influence on climate policy. Explicitly extending the commitment to lobbying in line with the goal of restricting global temperature rise to 1.5°C above pre-industrial levels sends a clear signal to a company's agents and proxies about what is expected of their climate change-related lobbying.	Transparency International: Principles 3 & 4 (2015) PRI, IIGCC, Ceres investor expectations (2015, 2018, 2020) AAA Framework: Align (2020)
GOVERNANCE			
4.	Assign responsibility at board level for oversight of its climate change lobbying approach and activities	This expectation can be met through having a board committee with oversight responsibility for climate change lobbying. This responsibility – whether assigned to an individual or a committee – should explicitly refer to climate change lobbying, not just general climate change-related activities or general policy lobbying-related activities.	Transparency International: Principles 1 & 5 (2015) Ceres Blueprint: Govern (2020)
5.	Assign responsibility at senior management level for day-to-day implementation of its climate change lobbying policies and practices	This responsibility – whether assigned to an individual or a committee – should explicitly refer to climate change lobbying, not just general climate change-related activities or general policy lobbying-related activities.	AAA Framework: Advocate (2020) Ceres Blueprint: Govern (2020)

6.	Establish an annual monitoring and review process to ensure that all of its direct and indirect climate change lobbying activities across <i>all</i> geographies are consistent with the goal of restricting global temperature rise to 1.5°C above pre-industrial levels	This should include publishing a detailed and clearly referenced analysis of its policy positions on climate change and on climate change lobbying, in order to ensure the consistency and delivery of its goals. The company should clarify how its policies in specific areas (e.g. those that are relevant to its business operations, those that are relevant to its low carbon transition strategy) align with the goal of restricting global temperature rise to 1.5°C above pre-industrial levels.	CDP 12.3f PRI, IIGCC, Ceres investor expectations (2015, 2018, 2020) AAA Framework: Align (2020) Ceres Blueprint: Govern (2020) InfluenceMap (2020)
7.	Establish a process for engaging with stakeholders related to setting and reviewing its climate change lobbying policies, positions and activities	Stages of the policy lobbying process in which it could be relevant to involve stakeholders include the development of a corporate position and programme on a specific policy issue; the development or review of a corporate policy on lobbying; the review of a specific lobbying activity or of a lobbying programme.	AAA Framework: Advocate (2020)
8.	Establish a clear framework for addressing misalignments between the climate change lobbying positions adopted by the associations, alliances and coalitions of which it is a member and the goal of restricting global temperature rise to 1.5°C above pre-industrial levels	To meet this expectation, the company should provide a clear account of: <ul style="list-style-type: none"> • The criteria it uses to assess whether the climate change lobbying positions adopted by the associations, alliances and coalitions of which it is a member align with the goal of restricting global temperature rise to 1.5°C above pre-industrial levels. • The escalation strategies it will use. Escalation strategies may include, but are not limited to: making public statements challenging trade associations and other alliances, withdrawing funding for the trade association or industry alliance, and suspending or ending membership of the trade association or industry alliance. • When it will use these escalation strategies (i.e. in what circumstances, over what timeframe and in what sequence). • How the Board owns and oversees this framework. 	Transparency International: Principles 3 & 4 (2015) AAA Framework: Align (2020) Ceres Blueprint: Act (2020) InfluenceMap (2020)

ACTION			
9.	Publish a detailed annual review covering the company's assessment and actions related to the 1.5°C-alignment of: (a) its own climate change lobbying activities; (b) the climate change lobbying activities of the associations, alliances, coalitions or thinktanks of which it is a member or to which it provides support	<p>To meet this expectation, the company should:</p> <ul style="list-style-type: none"> • Conduct such reviews on an annual basis. • Publish its rationale for assessing alignment with 1.5 °C policy. • Describe how the review was conducted, including any stakeholders that were consulted during the process. • Detail the scope of the review in terms of the entities covered and the entities not covered, with an emphasis on prioritising those most important to the company. • To the extent that they were taken, the assessment should include both positions that were aligned and misaligned with 1.5°C lobbying. • Present the key findings of the review. • Detail the actions taken as a result of the review. • Specify the actions that have been taken in situations where misalignments between the climate lobbying conducted by trade associations, coalitions and alliances and the goal of the goal of restricting global temperature rise to 1.5°C above pre-industrial levels have been identified (i.e. how its escalation strategies have been deployed), and, where the relationship persists, how this will be kept under review in the coming year. • Ensure the review is signed off by the Board. 	<p>CDP 12.3a and 12.3e GRI 103: Management approach, materiality & boundaries Transparency International: Principle 10 (2015) CA100+ Benchmark 7.1b, 7.3a & 7.3b (2021) AAA Framework: Align (2020) Ceres Blueprint: Assess (2020) InfluenceMap (2020)</p>
10.	Recognise the existence of and report on action to address any misalignments between its climate change lobbying and/or the climate change lobbying activities of its trade associations, coalitions, alliances or funded thinktanks and the goal of limiting global temperature rise to 1.5 °C above pre-industrial levels	<p>To be credible, the company's own assessment of misaligned activities should be cross-referenced with the views or assessments of relevant stakeholders.</p>	<p>Transparency International: Principles 4 & 9 (2015) PRI, IIGCC, Ceres investor expectations (2015, 2018, 2020) Transition Pathway Initiative (2019) Ceres Blueprint: Act (2020) InfluenceMap (2020)</p>

11.	Create or participate in coalitions that have the specific purpose of lobbying in support of the goal of restricting global temperature rise to 1.5°C above pre-industrial levels	Responsible climate change lobbying is not just about avoiding lobbying that obstructs climate policies. It must also be about lobbying proactively – individually and with others – for policy measures that support the goal of limited global temperature rise to 1.5°C above pre-industrial levels. If these vehicles do not already exist, companies should innovate. Such coalitions can help to communicate clear collective support from corporations for ambitious climate policy.	Transition Pathway Initiative (2019) Business Ambition for 1.5°C (2019) AAA Framework: Advocate (2020)
SPECIFIC DISCLOSURES			
12.	Publicly disclose, for all geographies, its membership of, support for and involvement in all associations, alliances and coalitions engaged in climate change-related lobbying	This transparency is an essential first step in companies taking responsibility for the climate change lobbying-related activities of the trade associations, alliances and coalitions that they are members of.	CDP 12.3c and 12.3d GRI 102-13: List of memberships Transparency International: Principles 4, 6 & 10 (2015) CA100+ Benchmark 7.2b (2021)
13.	Publicly disclose, for each of these organisations: (a) how much it pays to them on an annual basis; (b) those organisations where it sits on the board or plays an active role in committees or other activities related to climate change	This information is a measure of the of the influence that a company can exert over its trade associations, alliances and coalitions.	CDP 12.3b Transparency International: Principle 4 (2015) AAA Framework: Allocate (2020)
14.	Publicly disclose its overall assessment of the influence that its climate lobbying has had on (a) supporting ambitious public climate change policy; (b) the company's ability to deliver its own corporate transition strategy	The disclosure should clearly convey how the company is translating its commitment to responsible climate lobbying into practice. It should: <ul style="list-style-type: none"> • Elaborate on the public advocacy goals it set itself for the year under review and the extent to which it has made progress on these goals. • Specify the positions the company took during the year under review, e.g. in response to specific consultations or to specific policy proposals. • Explain how these positions aligned with the goal of limiting global temperature rise to 1.5°C above pre-industrial levels. • Provide an overall assessment of how the company's lobbying is helping to deliver the environment for a 1.5°C-aligned transition. 	GRI 415: Public policy OECD Principles: Enhancing transparency (2010) Transparency International: Principles 8, 9 & 10 (2015) AAA Framework: Advocate (2020) Ceres Blueprint: Assess and Act (2020)

DEFINITIONS AND NOTES		
1.	Climate change lobbying (definition)	The term ‘corporate climate lobbying’ refers to those activities carried out by corporations or their agents to directly or indirectly influence climate-significant policy decision-making by political or bureaucratic actors. Climate-significant policy refers to any environmental or non-environmental public policy with non-trivial implications – positive or negative – for realising the temperature goals of the Paris Agreement. Such lobbying – also commonly known as advocacy – can have a significant impact on the stringency and effectiveness of public climate policy. It is not only a matter of societal concern, but also an issue of material, financial, significance for corporations and their investors.
2.	Responsible climate change lobbying (definition)	‘Responsible climate change lobbying’ is defined as lobbying that aligns with the goal of limiting global temperature rise to 1.5 degrees Celsius above pre-industrial levels, and the ambition of greenhouse gas emissions peaking and reducing as soon as possible.
3.	Lobbying topics (scope)	The scope of climate change lobbying is not confined to policy measures directly concerned with climate change, but encompasses lobbying that has a foreseeable impact on greenhouse gas emissions and/or global temperature rise. Examples include policy measures in areas such as energy, infrastructure, land use and taxation.
4.	Lobbying approaches (scope)	These expectations cover both ⁱⁱ : <ul style="list-style-type: none"> • Direct lobbying, involving direct contact between the lobbying party and public policy decision-makers (including litigation); and • Indirect lobbying, where the lobbying party seeks to influence public policy indirectly by shaping and mobilising public opinion. This includes advertising, grassroots lobbying and social media activity.
5.	Lobbying actors (scope)	These expectations cover companies themselves and their agents, including but not limited to trade associations, industry bodies, thinktanks, coalitions and industry alliances. They may also include grassroots organisations or other organisations funded by the corporation or its agents. The focus is on the corporate entity, with companies expected to ensure consistency of approach across geographies and across different business units and in subsidiaries.

ⁱ This framework has been developed through a consultative process drawing on the views of representatives from academia, civil society, corporations, investors, and policy makers. It builds on and reinforces guidance published previously by a variety of actors.

ⁱⁱ Note that direct lobbying is often referred to as ‘insider’ lobbying and indirect lobbying is often referred to as ‘outsider’ lobbying.