

POOLED ENGAGEMENT



Q2 2019 Progress Report

(for the period ending 30 June 2019)

July 24, 2019

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ISS ESG

ISS ESG is the responsible investment arm of Institutional Shareholder Services Inc., the world's leading provider of environmental, social, and governance solutions for asset owners, asset managers, hedge funds, and asset servicing providers. Under the ISS ESG umbrella are three discrete units that draw on deep historical and industry expertise, including: ISS-ethix, which enables investors to develop and integrate responsible investing policies and practices, engage on responsible investment issues, and monitor portfolio company practices through screening solutions; ISS-climate, which provides data, analytics and advisory services to help financial market participants understand, measure, and act on climate-related risks across all asset classes; and ISS-oekom, which provides corporate and country ESG research and ratings and enables its clients to identify material social and environmental risks and opportunities including through advisory services. ISS ESG clients rely on the expertise of all three to help them integrate responsible investing policies and practices into their strategy and shareholder voting decisions.

EXECUTIVE SUMMARY

The Pooled Engagement Quarterly Report for Q2 2019 consists of two parts. The first part provides a description of ISS-ethix's Pooled Engagement service, which is conducted on behalf of investors with companies that have been assessed under ISS-ethix's **Norm-Based Research** to be facing alleged or verified severe, systematic or systemic failures to respect international norms and guidelines on responsible business conduct. The second part of the report provides the most up-to-date data concerning engagement carried out on behalf of institutional investors in Q2 2019. The second part also includes, for external reporting purposes, numerical and statistical summaries of companies engaged with, notable engagement activity, an overview and summary of responses received on letters sent out in Q2 2019, and overviews of the reminders and escalations to companies which did not provide a response to investors queries.

The detailed engagement reports for the individual companies listed in the report, and their responses, are available via the [PE Tool online](#).

OUR ENGAGEMENT APPROACH

Truly effective engagement takes time and requires investment in the process. ISS ESG's Pooled Engagement approach is focused on positive change by supporting companies in their efforts to manage or mitigate environmental and social risks.

Initiating engagement

ISS ESG's Pooled Engagement service focuses on companies that are assessed under **Norm-Based Research** to be involved in alleged or verified severe, systematic or systemic failures to respect international norms. Engagement under the service is preceded by in-depth research and fact-finding dialogue with companies and stakeholders. Through a feasibility study ISS ESG identifies gaps in company disclosure and whether the desired level of disclosure can be achieved through investor dialogue. Influential factors include an estimation of the company's level of responsibility, steps it has taken to mitigate the possible failure to respect a norm, and availability of both stakeholder and expert sources to facilitate constructive dialogue.

Conducting effective engagement dialogue

Pooled Engagement aims at building a relationship which is conducive to constructive dialogue through which investors may exercise influence. ISS ESG's Pooled Engagement approach encourages companies to elaborate on their efforts to design and implement better risk management systems at the operational level, to minimize the risk for re-occurrence of failures to respect international norms. ISS ESG seeks to appreciate whether a company has proven successful in implementing a genuine reduction in risk, with positive results for both management and operations. Engagement is therefore accompanied by clear and time-bound engagement goals, based on expectations on the company's ability to address shortcomings in the context of its specific business sector and relevant industry standards.

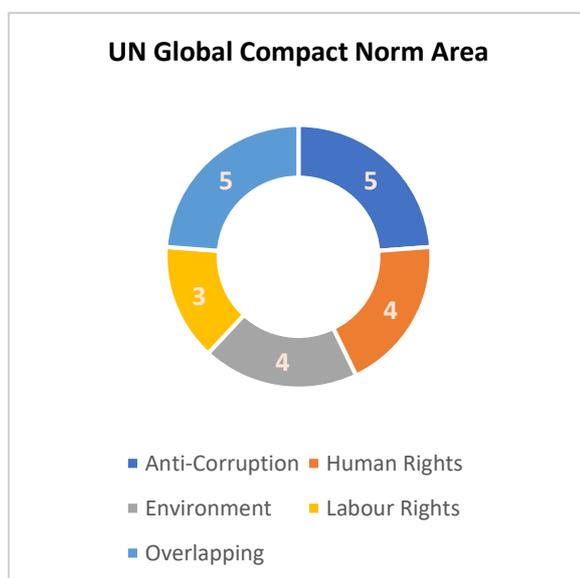
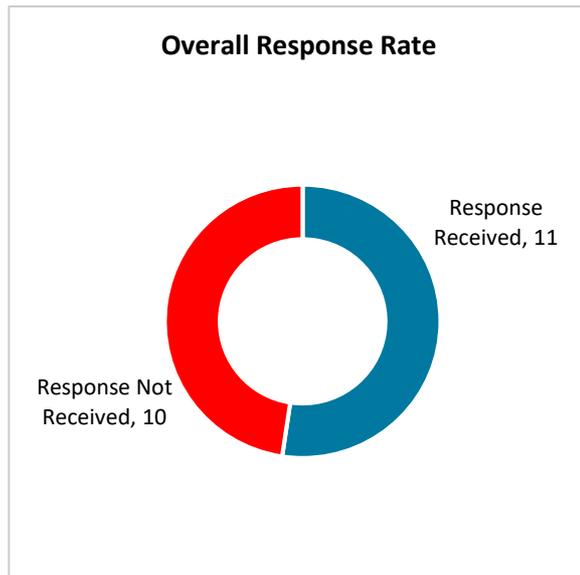
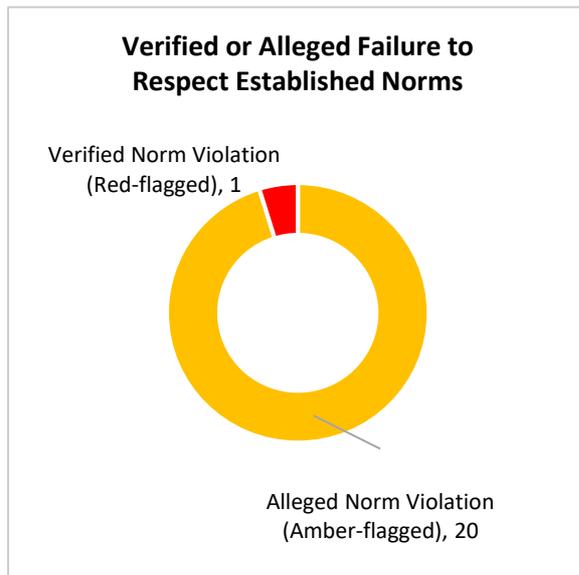
As Pooled Engagement is rooted in an assessment of company responsiveness to ongoing controversies carried out under Norm-Based Research, it allows investors to voice concerns in a timely manner. This increases their possibilities to influence and provides concrete opportunities for companies to address the identified issues.

Process for eliciting responses from non-responsive companies

Over time, responsiveness is noted with most companies with which engagement is sought. Others require repeated follow-ups to respond, and some steadfastly fail to respond to investor concerns. To address these challenges in communication, regular and courteous follow-up is built into ISS ESG's approach. Once every effort has been made to engage both Investor Relations and the company CEO, the feasibility of engagement is re-evaluated. In certain cases, where a company has proven unresponsive to investors' efforts to exercise active ownership, the decision has been taken by ISS ESG to discontinue dialogue with a company. From Q1 2018 a new step was introduced into the follow-up process whereby after escalation to the CEO, investors queries will be escalated to the company's Board.

ENGAGEMENT STATISTICS FOR Q2 2019

In Q2 2019 under the Pooled Engagement service engagement was conducted with 21 companies, of which 1 is RED-flagged and 20 are AMBER-flagged, according to ISS-ethix's Norm-Based Research methodology. Of the 21 companies, 11 have replied to the initial investors engagement letter so that overall response rate is 52%. To assist investors with their reporting, the statistics presented below are derived from the 21 companies with which engagement was conducted in Q2 2019.



Please refer to the attached data file for further details and refer to the following sections. For the summary of all company responses to Q2 2019 engagement enquiries, see [Summary of All Engagement Responses in Q2 2019](#). A list of companies that responded or reminders sent for Q4 engagements is found in [Responsiveness to Q2 Engagement Letters](#). For the list of companies that have failed to respond to our past engagement attempts, and which are subject to our ongoing reminders and escalations process, please see [Reminders and Escalations carried out until July 2019](#).

NOTABLE ENGAGEMENT ACTIVITY IN Q2 2019

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
ALROSA PJSC	Russia	Good
NORM AREA Overlapping: Labour Rights; Environment	RESPONSE May 2019: Response received from Mr Sergey Takhiev, Head of Corporate Finance, ALROSA PJSC.	
SUMMARY ALROSA PJSC replied to investor enquiries concerning its environmental and labor rights performance related to its operations in Sakha Republic, Russia. In response to investor enquiries on the implementation of the measures ordered by the Russian Federal Environmental, Technological and Nuclear Supervision Service (Rostekhnadzor) following the August 2017 accident involving the Mir mine, ALROSA provided information on the measures it has taken to localise and eliminate the causes of the accident. The company also disclosed on the steps it has taken to prevent similar accidents at its other mining facilities. On the question regarding mechanisms that the Company has in place to remediate the impacts of pollution of watersheds such as the Vilyuy river, and to support and compensate affected communities, ALROSA stated that the company was found not guilty of the event which was classified as a natural disaster and treated as force majeure, according to court judgments. Finally, in response to the issue of how ALROSA manages risks and implements measures to prevent or mitigate impacts of accidents caused by natural disasters, the Company stated that for each of the Company’s hydro-technical facilities, there is a Safety Declaration developed and approved with Russian Federal Environmental, Technological and Nuclear Supervision Service (Rostekhnadzor) authorities, which confirms the safety of the hydro-technical facility and prescribes safety measures as per its class. ISS-ethix appreciates ALROSA’s openness to dialogue and transparency with regard to the measures that it has taken to remediate the impact of the August 2017 fatal industrial accident involving Mir diamond mine, and remains vigilant of the efficacy of its efforts to prevent similar incidents at its other mining facilities. The Company continued responsiveness to investor enquiry in conjunction with the detail of their most recent disclosures is notable.		

SUMMARY OF ALL ENGAGEMENT RESPONSES RECEIVED IN Q2 2019

Companies involved in verified failures to respect international norms and guidelines (Red-flagged)

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
VALE SA	Brazil	Open
NORM AREA	RESPONSE	
Overlapping: Environment; Labour rights	May 2019: Engagement meeting held with Mr Fernando Mascarenhas, Director of Investor Relations; Ms Liesel Filgueiras, General Manager of Social Responsibility; and Ms Renata Capanema.	
SUMMARY		
<p>On 21 May 2019 members of Vale SA’s investor relations and social responsibility teams informed investors about the developments regarding the Brumadinho dam breach in January 2019. Vale detailed its efforts regarding support and recovery, investigation, and general dam safety. The company stated that it does not know yet the cause of the incident, but that it does know it must act differently. Vale stated that it wants to go beyond current Brazilian standards and be an instrument to change, emphasizing that it has the size, resources and expertise to contribute and play a key role in the industry. ISS-ethix welcomes the openness to engagement and Vale’s sincere efforts to clean up the affected area, compensate those impacted and improving the tailings management and general safety at its operations. ISS-ethix looks forward to continued dialogue and additional information on how the Company will proceed with the remediation efforts following the breach in Brumadinho.</p> <p>ISS-ethix welcomes the openness to engagement and Vale’s sincere efforts to clean up the affected area, compensate those impacted and improving the tailings management and general safety at its operations. ISS-ethix looks forward to continued dialogue and additional information on how the Company will proceed with the remediation efforts following the breach in Brumadinho.</p>		

Companies involved in alleged failures to respect international norms and guidelines (Amber-flagged)

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
ALROSA PJSC	Russia	Good
NORM AREA	RESPONSE	
Overlapping: Labour Rights; Environment	May 2019: Response received from Mr Sergey Takhiev, Head of Corporate Finance, ALROSA PJSC.	

SUMMARY

ALROSA PJSC replied to investor enquiries concerning its environmental and labor rights performance related to its operations in Sakha Republic, Russia. In response to investor enquiries on the implementation of the measures ordered by the Russian Federal Environmental, Technological and Nuclear Supervision Service (Rostekhnadzor) following the August 2017 accident involving the Mir mine, ALROSA provided information on the measures it has taken to localise and eliminate the causes of the accident. The company also disclosed on the steps it has taken to prevent similar accidents at its other mining facilities. On the question regarding mechanisms that the Company has in place to remediate the impacts of pollution of watersheds such as the Vilyuy river, and to support and compensate affected communities, ALROSA stated that the company was found not guilty of the event which was classified as a natural disaster and treated as force majeure, according to court judgments.

Finally, in response to the issue of how ALROSA manages risks and implements measures to prevent or mitigate impacts of accidents caused by natural disasters, the Company stated that for each of the Company’s hydro-technical facilities, there is a Safety Declaration developed and approved with Russian Federal Environmental, Technological and Nuclear Supervision Service (Rostekhnadzor) authorities, which confirms the safety of the hydro-technical facility and prescribes safety measures as per its class.

ISS-ethix appreciates ALROSA’s openness to dialogue and transparency with regard to the measures that it has taken to remediate the impact of the August 2017 fatal industrial accident involving Mir diamond mine, and remains vigilant of the efficacy of its efforts to prevent similar incidents at its other mining facilities. The Company continued responsiveness to investor enquiry in conjunction with the detail of their most recent disclosures is notable.

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
Anheuser-Busch InBev SA/NV	India, Peru	Adequate
NORM AREA	RESPONSE	
Labour Rights	May 2019: Response received from Ms Pamela Cornes, Director of Social Impact.	

SUMMARY

Anheuser-Busch InBev SA/NV responded to investors’ enquiries concerning allegations of failure to respect union rights in the Peru and India. The Company shared details concerning the implementation of its Global Human Rights Policy and the review of its human rights due diligence processes both in its operations and supply chain. During 2017, the Company conducted assessments in sixteen countries, representing 8 zones, and throughout 2018 the company continued to monitor existing remediation plans and conduct assessments when appropriate. The Company is redesigning its assessment model, collaborating across business functions and through engagement with external stakeholders. Consideration for how to expand our engagement with external stakeholders and their involvement in Anheuser-Busch InBev’s assessment process is part of the Company’s due diligence evolution underway in 2019. ISS-ethix is encouraged by Anheuser-Busch InBev’s openness to dialogue with investors and current review of its due diligence processes. A couple of follow-up questions have been submitted for which the Company’s response is pending.

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
Eni SpA	Nigeria, Algeria, Italy	Good
NORM AREA	RESPONSE	
Overlapping: Anti-Corruption; Environment; Labour Rights	May 2019: Response received from Ms Rosanna Bolzoni, Investor Relations SRI Manager.	
SUMMARY		
<p>Eni SpA responded to investor queries on: the status of the Company’s response to the anti-corruption allegations in Nigeria; the application of the Company’s anti-corruption policies on its affiliate Saipem SpA; the status of the remediation efforts of the oil spill and the status of the clean-up efforts in the Niger Delta; and the Company’s stance on human rights as it relates to the due diligence and auditing processes with regard to the allegations of labour rights breaches at Shell Petroleum Development Company of Nigeria (SPDC), in which Eni SpA has joint-venture interest. Eni SpA provided the overview of its policies in place. A detailed review of the Company’s response to each of the cases is available on the PE Tool under the Company engagement timeline. ISS-ethix appreciates Eni’s responsiveness and transparency on each of these cases and remains vigilant on developments concerning the implementation and remediation programs.</p>		

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
Golden Agri-Resources Ltd.	Indonesia	Good
NORM AREA	RESPONSE	
Anti-Corruption	May 2019: Response received from Mr Richard Fung, Investor Relations Director.	
SUMMARY		
<p>Golden Agri-Resources Ltd. (GAR) replied to the engagement enquiry on the topic of “Alleged failure to prevent bribery in Indonesia” to provide updates on the investigation into the bribery allegations in Indonesia, disclose details of a possible anti-corruption programme and elaborate on specific actions being taken to enhance its compliance processes. ISS-ethix notes GAR’s openness to engage with investors on the issues noted. GAR has openly provided clarifications with regard to the developments into the investigation by authorities and initiative taken to enhance its compliance, however the Company has yet to further provide specific information regarding its compliance function and anti-corruption programme. A follow-up will be submitted o the Company seeking additional information on that topic.</p>		

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
Grupo México S.A.B. de C.V.	Mexico, Peru	Deferred
NORM AREA	RESPONSE	
Overlapping: Environment; Human Rights	May 2019: Acknowledgment of the engagement letter received from Mr Nicolas Moureau, Strategy & Institutional Relations Manager.	
SUMMARY		
Acknowledgment received from the Company that the engagement letter has been received and that a response is forthcoming. A reminder email has been sent to Mr Moureau.		

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
MMC Norilsk Nickel PJSC	Russia	Good
NORM AREA	RESPONSE	
Environment	May 2019: Response received from Ms Valerie Alekseenko, Investor Relations Department.	
SUMMARY		
<p>NorNickel responded to investor queries regarding pollution stemming from the company's metals processing operations in Norilsk and on the Kola Peninsula. The company aims to reduce its sulphur dioxide emissions by 75% in Norilsk Industrial District by 2023 and 50% on the Kola Peninsula by 2020. On land rehabilitation, the company informed investors that it is following Russian regulation regarding land rehabilitation and other environmental protection initiatives associated with field development, construction and other operations. The company also shared details on the progress of its land rehabilitation in 2018. ISS-ethix continues to appreciate the transparency NorNickel displays and the willingness to discuss its efforts to curb emissions in its operations. ISS-ethix remains cautiously optimistic about the company's change in direction beginning in 2016 that have led to several concrete initiatives to improve its environmental management practices. The company now needs to follow through on its ambitions and diligently inform the public on its progress.</p>		

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
Southern Copper Corp.	Mexico, Peru	Deferred
NORM AREA Overlapping: Environment; Human Rights	RESPONSE May 2019: Acknowledgment of the engagement letter received from Mr Nicolas Moureau, Strategy & Institutional Relations Manager at Grupo Mexico, of which Southern Copper Corp. is a majority-owned indirect subsidiary.	
SUMMARY Acknowledgment received from the Company that the engagement letter has been received and that a response is forthcoming. A reminder email has been sent to Mr Moureau.		

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
Tokyo Electric Power Co. Holdings, Inc.	Japan	Good
NORM AREA Environment	RESPONSE May 2019: Response received from the Shareholder & Investor Relations Group, Corporate Affairs & Legal Office.	
SUMMARY TEPCO responded to investors' enquiries regarding the continued remediation measures at the Fukushima Daiichi nuclear power plant. TEPCO informed investors on details regarding the plant's decommissioning road map, the management of contaminated water and the permanent storage of fuel debris. The company admits that it is facing unprecedented challenges and many uncertainties in its remediation efforts, which are likely to go on for decades. Fuel debris retrieval is technically challenging and has never been conducted before but TEPCO will continue to work closely with the government and international expertise to commence retrieval in 2021 as outlined in the Mid-and-Long-Term Roadmap. ISS-ethix appreciates the transparency and willingness with which TEPCO discusses details of its efforts.		

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
Wal-mart de Mexico SAB de CV	Mexico	Good
NORM AREA	RESPONSE	
Anti-Corruption	May 2019: Response received from Ms Claudia De la Vega Martinez, Director of Development and Corporate Responsibility.	
SUMMARY		
<p>Wal-Mart de México, S.A.B. de C.V. (Walmart de México)'s operations in Mexico raised concerns as the company allegedly engaged in bribery from 2003 to 2004 to bypass building requirements such as urban impact assessments, environmental and traffic permits for the construction of Walmart stores in Mexico. The company noted that matters regarding to alleged violations to the Foreign Corrupt Practices Act (FCPA) corresponds to Walmart Inc., and not Walmart de México. The company also said in their response that for 2018 the efforts they made in reducing corruption risks have seen progress. Walmart de México said that in 2018, it has conducted trainings on Statement of Ethics for about 94,470 hours for it field and staff associates in Mexico and Central America. ISS-ethix appreciates the updates shared on the Walmart de México efforts in striving for integrity and averting corruption risks, however, deems that the company's reply fell short of substantively addressing the concerns regarding the bribes allegedly paid to acquire business permits in Mexico.</p>		

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
Weyerhaeuser Co.	Canada	Good
NORM AREA	RESPONSE	
Human Rights	May 2019: Response received from Ms Beth Baum, Senior Director, Investor Relations.	
SUMMARY		
<p>Weyerhaeuser Co. updated investors that Grassy Narrows has decided to leave the Trilateral working group and meet with Weyerhaeuser and the Provincial Government individually. Weyerhaeuser's most recent consultation meetings with the Grassy Narrows to discuss forestry opportunities within their traditional land use area (TLUA) were held in November 2018 and May 2019. The company elaborated that much of the discussion has related to a pilot project being developed by its foresters and Grassy Narrows' representatives, including elders and trappers. Weyerhaeuser reiterated that it is not using or selling wood from the Grassy Narrows TLUA. Also, the company communicated that the Provincial Government of Ontario holds the license to manage forestry operations for the Whiskey Jack forest and is responsible for developing the next forest management plan (FMP). The province and Grassy Narrows must work together to negotiate opportunities for extending the harvest moratorium. The company emphasized that its hope is that this ongoing constructive dialogue will lead to a mutually beneficial agreement to make some wood available from the Grassy Narrows TLUA in a manner that meets the community's needs. ISS-ethix is encouraged by Weyerhaeuser's openness to dialogue with investors, including updated information on its relationship with Grassy Narrows.</p>		

RESPONSIVENESS TO Q2 2019 ENGAGEMENT LETTERS

The following table summarizes the responsiveness to the engagement enquiries made in Q2 2019. Companies that did not respond to the initial engagement letters were sent reminder notifications by email to the Investor Relations contacts. Continued non-response to the reminders will lead to escalation of engagement attempts to the CEO and then the Board level as described under the section, *Our Engagement Approach* above.

Response summaries from reminders or escalations will be presented in the 2019 annual report if received; alternatively, the responses will become available via the [PE Tool online](#).

Issuer	ISIN	NBR Signal	Response	Response Details	Current Status
ALROSA PJSC	RU0007252813	Amber (●)	TRUE	Responded - May 2019	
Anheuser-Busch InBev SA/NV	BE0974293251	Amber (●)	TRUE	Responded - May 2019	Follow-up sent
Eni SpA	IT0003132476	Amber (●)	TRUE	Responded - May 2019	
Golden Agri-Resources Ltd.	MU0117U00026	Amber (●)	TRUE	Responded - May 2019	
MMC Norilsk Nickel PJSC	RU0007288411	Amber (●)	TRUE	Responded - May 2019	
Tokyo Electric Power Co. Holdings, Inc.	JP3585800000	Amber (●)	TRUE	Responded - May 2019	
VALE SA (meeting)	BRVALEACNOR0	Red (●)	TRUE	Responded - May 2019	
Wal-mart de Mexico SAB de CV	MX01WA000038	Amber (●)	TRUE	Responded - May 2019	
Weyerhaeuser Co.	US9621661043	Amber (●)	TRUE	Responded - May 2019	
Grupo México S.A.B. de C.V.	MXP370841019	Amber (●)	TRUE	Acknowledged – May 2019	Reminder sent - July 2019
Southern Copper Corp.	US84265V1052	Amber (●)	TRUE	Acknowledged – May 2019	Reminder sent - July 2019
China Petroleum & Chemical Corp.	CNE1000002Q2	Amber (●)	FALSE	-	Reminder sent - July 2019
Companhia Paranaense de Energia	BRCPLACNPB9	Amber (●)	FALSE	-	Reminder sent - July 2019
Deutsche Bank AG	DE0005140008	Amber (●)	FALSE	-	Reminder sent - July 2019
Facebook, Inc.	US30303M1027	Amber (●)	FALSE	-	Reminder sent - July 2019
Formosa Plastics Corp.	TW0001301000	Amber (●)	FALSE	-	Reminder sent - July 2019
Lu Thai Textile Co., Ltd.	CNE000000ST8	Amber (●)	FALSE	-	Reminder sent - July 2019
ROSSETI PJSC	RU000A0JPVJ0	Amber (●)	FALSE	-	Reminder sent - July 2019
Tongling Nonferrous Metals Group Co., Ltd.	CNE000000529	Amber (●)	FALSE	-	Reminder sent - July 2019
Top Glove Corp. Bhd.	MYL711300003	Amber (●)	FALSE	-	Reminder sent - July 2019
Zijin Mining Group Co., Ltd.	CNE100000502	Amber (●)	FALSE	-	Reminder sent in July 2019

REMINDERS & ESCALATIONS STATUS - JULY 2019

The following companies had failed to respond to engagement enquiries made in previous quarters and year. As such, they were subject to the process set out above under the section, *Our Engagement Approach*, for eliciting responses from unresponsive companies. Unresponsive companies to the current reminders or escalations are going to be escalated to the next levels as described above.

Reminder notifications by email or phone calls were sent to the relevant Investor Relations, CEO or Board levels. Response summaries from reminders or escalations will be presented in the 2019 annual report; alternatively, the responses will be published in the [PE Tool online](#) as they are received and processed.

Company	ISIN	NBR Signal	Engagement Year/Qtr	Reminder/Escalation Status
Adani Enterprises Ltd.	INE423A01024	Amber (●)	2019-Q1	Escalated to the CEO – July 2019
Aegea Saneamento e Participações SA	US00775CAA45	Amber (●)	2019-Q1	Escalated to the CEO – July 2019
Contura Energy, Inc.	US21241B1008	Amber (●)	2019-Q1	Escalated to the CEO – July 2019
Enagás SA	ES0130960018	Amber (●)	2019-Q1	Escalated to the CEO – July 2019
Evergy, Inc.	US30034W1062	Amber (●)	2019-Q1	Escalated to the CEO – July 2019
Exxon Mobil Corp.	US30231G1022	Amber (●)	2019-Q1	Escalated to the CEO – July 2019
Pyxus International, Inc. (fmr. Alliance One International, Inc.)	US0187721032	Amber (●)	2018-Q3	Escalated to the CEO – July 2019
SNAM SpA	IT0003153415	Amber (●)	2019-Q1	Escalated to the CEO – July 2019
Westmoreland Coal Co.	US9608781061	Amber (●)	2019-Q1	Escalated to the CEO – July 2019
AMP Ltd.	AU000000AMP6	Amber (●)	2018-Q4	Escalated to the board – July 2019
Mega First Corp. Bhd.	MYL306900001	Amber (●)	2018-Q4	Escalated to the board – July 2019
SNC-Lavalin Group, Inc.	CA78460T1057	Amber (●)	2018-Q4	Escalated to the board – July 2019
XPO Logistics, Inc.	US9837931008	Red (●)	2018-Q4	Escalated to the board – July 2019
China Gold International Resources Corp. Ltd.	CA16890P1036	Amber (●)	2018-Q4	Escalated to the board – July 2019
Power Construction Corporation of China, Ltd.	CNE1000017G1	Amber (●)	2018-Q4	Escalated to the board – July 2019
Ratch Group Co., Ltd.	TH0637010008	Amber (●)	2018-Q4	Escalated to the board – July 2019
The Blackstone Group LP	US09253U1088	Amber (●)	2018-Q3	Escalated to the board – July 2019
Ecopetrol SA	COC04PA00016	Amber (●)	2018-Q3	Escalated to the board – July 2019
Industrial and Commercial Bank of China Ltd.	CNE1000003G1	Amber (●)	2018-Q3	Escalated to the board – July 2019
Volcan Compania Minera S.A.A.	PEP648014202	Amber (●)	2018-Q3	Escalated to the board – July 2019
Whirlpool Corp.	US9633201069	Amber (●)	2018-Q3	Escalated to the board – July 2019
WTK Holdings Bhd.	MYL424300001	Amber (●)	2018-Q3	Escalated to the board – July 2019



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