



# POOLED ENGAGEMENT



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## Q3 2019 Progress Report

(for the period ending 30 September 2019)

November 8, 2019

## TABLE OF CONTENTS

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EXECUTIVE SUMMARY .....	3
OUR ENGAGEMENT APPROACH .....	4
Initiating engagement.....	4
Conducting effective engagement dialogue .....	4
Process for eliciting responses from non-responsive companies.....	4
ENGAGEMENT STATISTICS FOR Q3 2019 .....	5
NOTABLE ENGAGEMENT ACTIVITY IN Q3 2019 .....	6
SUMMARY OF ALL ENGAGEMENT RESPONSES RECEIVED IN Q3 2019.....	7
Companies involved in verified failures to respect international norms and guidelines (Red-flagged) .....	7
Companies involved in alleged failures to respect international norms and guidelines (Amber-flagged) .....	9
RESPONSIVENESS TO Q3 2019 ENGAGEMENT LETTERS .....	16
REMINDERS & ESCALATIONS STATUS: Q3 2019 .....	17

## EXECUTIVE SUMMARY

The Pooled Engagement Quarterly Report for Q3 2019 consists of two parts. The first part provides a description of ISS ESG's Pooled Engagement service, which is conducted on behalf of investors with companies that have been assessed under ISS ESG'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 Q3 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 Q3 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 ISS ESG's online reporting platform [PE Tool](#).

## 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.

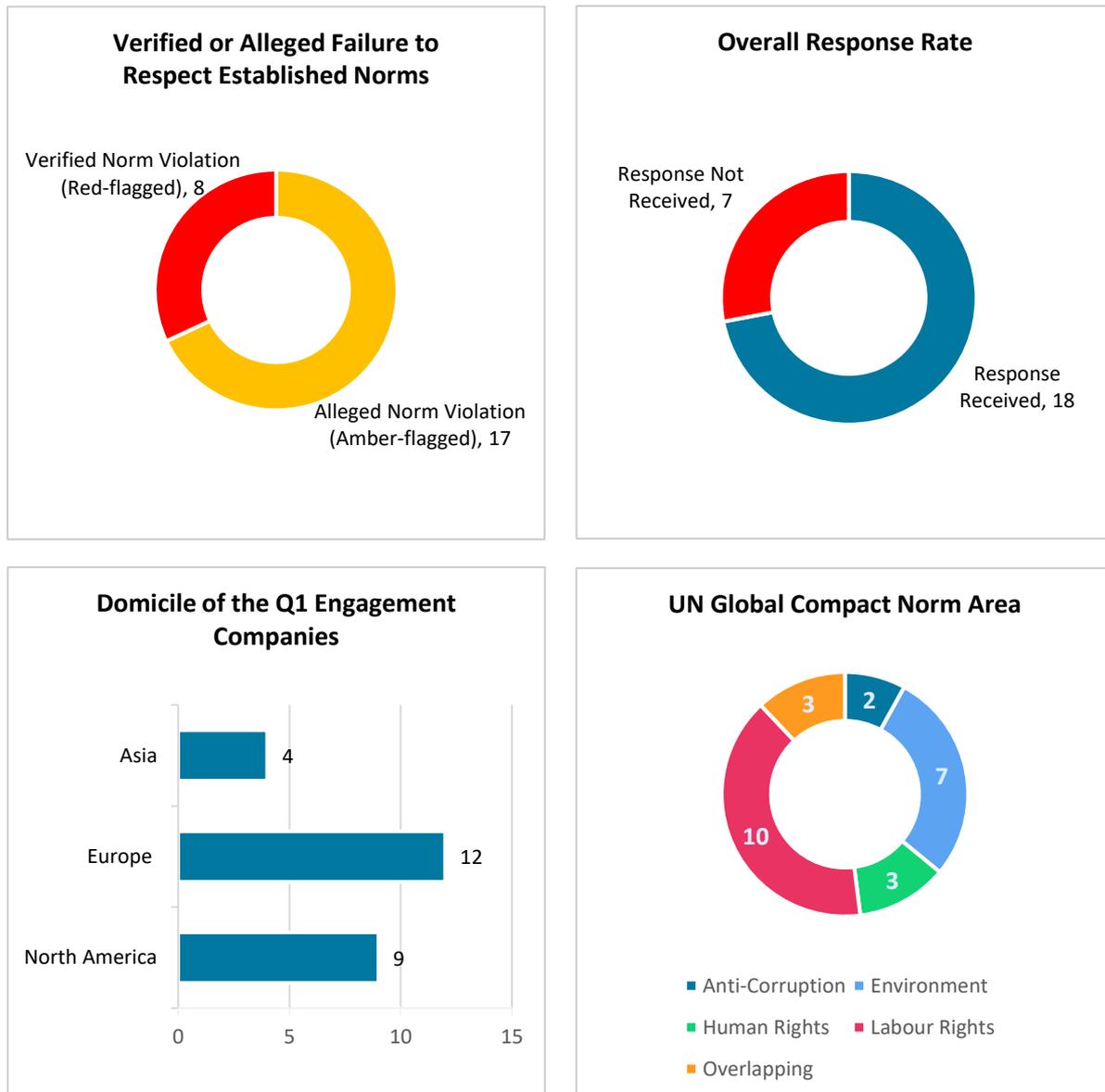
As Pooled Engagement is rooted in an assessment of company responsiveness to ongoing controversies carried out under Norm-Based Research, it allows investors to voice concerns in a timely manner. This increases their possibilities to influence and provides concrete opportunities for companies to address 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 Q3 2019

In Q3 2019 under the Pooled Engagement service engagement was conducted with 25 companies, of which 8 are RED-flagged and 17 are AMBER-flagged, according to ISS ESG’s Norm-Based Research methodology. Of the 25 companies, 18 have replied to the initial investor engagement letter so that overall response rate is 72%. To assist investors with their reporting, the statistics presented below are derived from the 25 companies with which engagement was conducted in Q3 2019.



Please refer to the attached data file or refer to the following sections. For the summary of all company responses to Q3 2019 engagement enquiries, see [Summary of All Engagement Responses in Q3 2019](#). The responsiveness to Q3 engagements is summarized in the [Responsiveness to Q3 Engagement Letters](#) section. 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 during Q3 2019](#).

## NOTABLE ENGAGEMENT ACTIVITY IN Q3 2019

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
<b>Oil Co. LUKOIL PJSC</b>	Russia	Adequate
<b>NORM AREA</b> <b>Environment</b>	<b>RESPONSE</b> August 2019: Response received from Ms. Kristina Popilyuk, Senior Manager, IR.	
<b>SUMMARY</b>		
<p>LUKOIL PJSC responded to investor queries regarding its efforts to address its verified failure to prevent water and soil pollution at its operations in Russia, particularly in the Komi Republic. The Company disclosed several measures it has taken for managing the reliability of pipelines, which is based on legal requirements, federal norms of the Russian Federation, and corporate documents, including: an investment program for the renovation and technical re-equipment of pipeline transport; established emergency plans for dealing with oil spills that are continuously reviewed and monitored; reconstruction and replacement of pipelines and pipeline enhancements based on continuous technical diagnostics and examinations; higher requirements from contractors for repair and maintenance services; and systematic comprehensive employee trainings on oil spill response and prevention.</p> <p>It was noteworthy that LUKOIL PJSC demonstrated an openness to engagement and provided investors with comprehensive disclosure of the measures it has taken to address the recurrence of spills at its operations. Engagement has been suspended pending developments with legal proceedings and a review of the efficacy of the implementation of relevant programmes.</p>		

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
<b>G4S Plc.</b>	United Kingdom	Adequate
<b>NORM AREA</b> <b>Human Rights</b>	<b>RESPONSE</b> September 2019: Engagement meeting was held with Ms. Helen Parris, Director of Investor Relations, Mr. Nigel Lockwood, Head of CSR & Government Affairs, and Mr. Philip Wragg, Gatwick Detention Centers, COO at G4S Plc.	
<b>SUMMARY</b>		
<p>Participating in an engagement meeting with investors, G4S Plc. detailed the measures taken to address safety concerns and incidents of violence at Brook House Immigration Removal Center (IRC) and other facilities it manages in the U.K. The Company also shared details on measures taken to improve staff recruitment processes and increase staff retention rate.</p>		

The Company maintains that safety is paramount at the IRC and training teaches staff about culture, background, destination and openness of communication to encourage detainees to speak up on violence at the facilities it manages. G4S also informed investors that it has reinforced a culture of openness at Brook House by proactively organizing training courses on its Speak Out whistleblowing system. The Company shared that there has been an increase in cases reported as a result of the training. Furthermore, the Company reiterated that a June 2019 unannounced inspection report cited “no evidence” of abuses at the IRC as seen in the BBC Panorama program in 2017. The report, according to G4S, found also improved training and whistleblower procedures.

It is notable that G4S has demonstrated an openness to engagement and provided investors with comprehensive disclosure of the measures it has taken to address the issues that have been noted across its U.K. operations. Engagement has been suspended pending the implementation of its commitment to improved ESG disclosures and measures, and a review of their efficacy.

## SUMMARY OF ALL ENGAGEMENT RESPONSES RECEIVED IN Q3 2019

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

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
<b>Oil Co. LUKOIL PJSC</b>	Russia	Adequate
<b>NORM AREA</b>	RESPONSE	
<b>Environment</b>	August 2019: Response received from Ms. Kristina Popilyuk, Senior Manager, IR.	
<b>SUMMARY</b>		
<p>LUKOIL PJSC responded to investor queries regarding its efforts to address its verified failure to prevent water and soil pollution at its operations in Russia, particularly in the Komi Republic. The Company disclosed several measures it has taken for managing the reliability of pipelines, which is based on legal requirements, federal norms of the Russian Federation, and corporate documents, including: an investment program for the renovation and technical re-equipment of pipeline transport; established emergency plans for dealing with oil spills that are continuously reviewed and monitored; reconstruction and replacement of pipelines and pipeline enhancements based on continuous technical diagnostics and examinations; higher requirements from contractors for repair and maintenance services; and systematic comprehensive employee trainings on oil spill response and prevention. LUKOIL PJSC demonstrated an openness to engagement and provided investors with comprehensive disclosure of the measures it has taken to address the recurrence of spills at its operations. Engagement has been suspended pending developments with legal proceedings and a review of the efficacy of the implementation of relevant programmes.</p>		

COMPANIES	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
<b>First Pacific Co. Ltd.;</b> <b>Indofood Agri Resources Ltd.;</b> <b>PT Indofood Sukses Makmur Tbk;</b> <b>PT Perusahaan Perkebunan London Sumatra Indonesia Tbk;</b> <b>PT Salim Ivomas Pratama Tbk</b>	Indonesia	Adequate

NORM AREA	RESPONSE
Labour Rights	August 2019: Response received from Mr. Muhammad Waras, Head of Sustainability at Indoagri Group of Companies on behalf of the cluster of five companies.

SUMMARY

In response to investor enquiry, the company stated that it, despite having resigned its membership of the Roundtable for Sustainable Palm Oil (RSPO), continues to comply with Indonesian laws and regulations and implement policies relating to labour practices and human rights, and that labour standards will be audited through the Indonesian Sustainable Palm Oil (ISPO) certification process. The company also stated that it has a robust process to review and act on grievances, involving senior management, and that processes are regularly reviewed together with the parent company and major shareholders in order to ensure alignment with best practice. The company also reiterated its position that it has fully complied with the RSPO complaint process since 2016 and that it has conducted several internal audits in response to the allegations in North Sumatra. ISS ESG notes the company’s decision to withdraw from the RSPO, which remains the internationally recognised authoritative standard for achieving long term sustainable palm oil production.

ISS ESG appreciates the company’s openness to dialogue on the issues noted and the commitment to ensure adequate labour standards at its Indonesian operations. ISS ESG is following up to the Company to inquire how the Company ensures that its grievance mechanisms are adequate and effective.

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

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
<b>Daimler AG</b>	United States	Good
<b>NORM AREA</b> Environment	<b>RESPONSE</b> August 2019: Response received from Mr. Andreas Kusche, Investor Relations.	
<b>SUMMARY</b>  In its response, Daimler stated that it cannot comment on ongoing investigations in the United States on emissions certification or the case on collusion in the European Union. However, the Company did provide updates on the measures to mitigate the risks from growing concerns of the diesel vehicles' impact on public health both internationally and specifically in Germany specifically.  ISS ESG appreciates the Company's openness to dialogue, the details provided, and is looking forward to continuing engagement in the future. Daimler has demonstrated an openness to dialogue and provided details on its ongoing efforts to manage the environmental controversy. Engagement has been suspended pending developments in ongoing investigations in the United States on emissions certification or the case on collusion in the European Union.		

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
<b>EXOR NV</b>	United States	Adequate
<b>NORM AREA</b> Environment	<b>RESPONSE</b> August 2019: Response received from Ms. Maite Labairu Trenchs, Investor Relations, referring to a response from Fiat Chrysler Automobiles NV's (FCA) Mr. Joe Veltri, Head of Global Investor Relations, who responded on behalf of both companies.	
<b>SUMMARY</b>  EXOR NV referred to the response from Fiat Chrysler Automobiles NV's (FCA) Mr. Joe Veltri, Head of Global Investor Relations, concerning measures and risk mitigation plans dealing with the allegations of its subsidiary's connection to the Dieseltgate scandal. FCA, which is EXOR's subsidiary, provided an overview of the measures implemented that are aimed to prevent and mitigate the risk of recurrence of the differential diesel emissions requirements in the United States and the European Union. Furthermore, FCA elaborated on the steps it is taking in assuaging the public concerns stemming from the use of diesel vehicles. ISS ESG appreciates the Company's openness to dialogue, the details provided, and is looking forward to continuing engagement in the future.		

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
<b>Fiat Chrysler Automobiles NV</b>	United States	Adequate

NORM AREA	RESPONSE
<b>Overlapping: Environment; Anti-Corruption</b>	August 2019: Response received from Mr. Joe Veltri, Head of Global Investor Relations.

**SUMMARY**

Fiat Chrysler Automobiles (FCA) provided an overview of implemented measures aimed to prevent and mitigate the risk of recurrence of the differential diesel emissions requirements in the United States and the European Union. Furthermore, the Company elaborated on the steps it is taking in assuaging the public concerns stemming from the use of diesel vehicles.

On the measures and procedures the Company has implemented to prevent and mitigate the risk of recurrence of the differential diesel emissions requirements and actions taken to ensuring the real-world emissions of its diesel vehicles will be within the limits established by United States (U.S.) and European Union regulation, the Company explained that in contrast to another auto industry diesel emissions-related settlement, FCA settlement with the U.S. Department of Justice (DoJ) and the California Office of Attorney General contains neither a finding of wrongdoing nor an admission of same by FCA. Notwithstanding, FCA and the agencies agreed to a three-year Consent Decree that calls for several actions FCA is required to undertake: in addition to a recall and certain testing, the consent decree's prominent settlement feature is an Improvement Plan, which FCA and the agencies agreed the Company must implement. The context of most of the 36 projects constituting this Improvement Plan is the implementation of a series of changes designed to shore up internal procedures for compliance with environmental laws and regulations concerning vehicle emissions and certification.

Additionally, the response informed that FCA has established an electrification strategy for its products, which employs various technologies designed to consider market/consumer needs, as well as applicable regulations.

ISS ESG appreciates the Company's openness to dialogue, the details provided, and is looking forward to continuing engagement in the future.

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
<b>G4S Plc.</b>	United Kingdom	Adequate

NORM AREA	RESPONSE
<b>Human Rights</b>	September 2019: Engagement meeting was held with Ms. Helen Parris, Director of Investor Relations, Mr. Nigel Lockwood, Head of CSR & Government Affairs, and Mr. Philip Wragg, Gatwick Detention Centers COO at G4S Plc.

SUMMARY

In the engagement meeting, G4S Plc. detailed the measures taken to address safety concerns and violence at Brook House Immigration Removal Center (IRC) and other facilities it manages in the U.K. The Company also shared details on measures taken to improve staff recruitment processes and increase staff retention rate. The Company maintains that safety is paramount at the IRC and training teaches staff about culture, background, destination and openness of communication to encourage detainees to speak up on violence at the facilities it manages. G4S also informed investors that it has reinforced a culture of openness at Brook House by proactively organizing training courses on its Speak Out whistleblowing system. The Company shared that there has been an increase in cases reported as a result of the training. Furthermore, the Company reiterated that a June 2019 unannounced inspection report cited “no evidence” of abuses at the IRC as seen in the BBC Panorama program in 2017. The report, according to G4S, found also improved training and whistleblower procedures.

G4S has demonstrated an openness to engagement and provided investors with comprehensive disclosure of the measures it has taken to address the issues that have been noted across its U.K. operations. Engagement has been suspended pending the implementation of its commitment to improved ESG disclosures and measures, and a review of their efficacy.

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
<b>Indivior PLC</b>	United States	Adequate
NORM AREA	RESPONSE	
<b>Human Rights</b>	August 2019: Response received from Mr. Jason Thompson, Vice President, Investor Relations	

SUMMARY

In response to investor enquiries on Indivior PLC's indictment by the U.S. Department of Justice regarding its alleged misleading marketing and promotion practices for its Suboxone film, the Company stated that proceedings are ongoing and a trial date has been set for May 2020. The Company reiterated that the U.S. Food and Drug Administration and Centers for Disease and Control acknowledged the Company's treatment for opioid addiction. In response to enquiries regarding its remedial actions to address the allegations, Indivior enumerated some features: (1) Integrity & Code of Conduct training process mandated for all employees; (2) a third-party grievance mechanism; (3) appointment of a new Chief Integrity and Compliance Officer; and (4) Global Code of Conduct.

Indivior demonstrated an openness to dialogue and transparency with regard relevant information regarding the pending lawsuit against the Company. Engagement has been suspended pending developments with legal proceedings and the implementation of relevant programmes.

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
<b>ING Groep NV</b>	Netherlands	Deferred
<b>NORM AREA</b> Anti-corruption	<b>RESPONSE</b> July 2019: Acknowledgment received from Mr. Mark Milders, Head of Investor Relations. October 2019: Response received from Mr. Milders.	
<b>SUMMARY</b>  In October 2019 Mr Mark Milders (Head of Investor Relations) responded with a reply to the engagement questions posed in Q3 2019. Mr. Milers also to participate in a call facilitated by ISS ESG. The response is being processed and will be published online shortly.		

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
<b>Loomis AB</b>	Turkey	Adequate
<b>NORM AREA</b> Labour Rights	<b>RESPONSE</b> July 2019: Reply received from Mr. Anders Haker, Chief Investor Relations Officer, Loomis Group.	
<b>SUMMARY</b>  In response to investor queries regarding the allegations of the Company's failure to respect union rights by its 98%-owned subsidiary Loomis Güvenlik Hizmetleri A.Ş. in Turkey, Loomis AB strongly denied the allegations raised by the stakeholders. The Company reiterated that it follows the local legislation and that there is a procedure for unions to follow in Turkey through reaching certain membership thresholds before being certified by Turkish authorities as official bargaining agents. The company stated that a legal process to validate the status is currently ongoing and it will not be able to comment on the union's status until the legal process has been finalized.  ISS ESG appreciates the Company's responsiveness, however, assesses that the Company has yet to demonstrate that it is fully committed to respect workers' freedom of association and collective bargaining is upheld by its Turkish subsidiary, and will continue to monitor the developments regarding the legal process.		

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
<b>Renault SA</b>	France	Adequate / Good
<b>NORM AREA</b> Overlapping: Environment; Labour Rights	<b>RESPONSE</b>	

October 2019: Response received from Ms. Christine Naoumoff, CSR Strategy Project Manager and Mr. Olivier Mahe, Environmental Performance Project Manager

SUMMARY

Responses were received from Mr. Olivier Mahe, Environmental Performance Project Manager and Ms. Christine Naoumoff, CSR Strategy Project Manager on the topics of failure to prevent air pollution in France and failure to respect union rights in Turkey respectively.

Concerning measures taken in addressing allegations of excessive air emissions from its diesel vehicles, especially in light of a French Directorate-General for Competition, Consumer Affairs and Prevention of Fraud (DGCCRF) May 2019 Report reportedly submitted to the prosecutors the company stated that it still does not have access to the document and cannot comment on it. However, the Company reaffirmed that its vehicles are not equipped with illegal defeat devices, confirmed by independent third-parties. In order to mitigate the risks from the growing concerns of the impact on public health from the continuous use of diesel vehicles Renault will launch 20 electric and hybrid vehicles. Finally, Renault monitors the scientific developments, public policies, and stakeholder expectations regarding health issues.

Regarding the implementation of Renault's commitment to respect workers' union rights at its operations in Turkey, the Company stated that it organised professional elections in April 2017, held regular meetings with Turk Metal representatives, and that IndustriALL Global Union accepted Turk Metal's re-affiliation request in 2019.

ISS ESG welcomes Renault's openness to dialogue and will continue to monitor for developments concerning the French investigation on the emissions issue. On the union rights issue in Turkey, ISS ESG will follow up with the Company to seek supporting details concerning the set of corrective measures taken to ensure that workers' union rights are upheld by its Turkish subsidiary.

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
<b>The GEO Group, Inc.</b>	United States	Adequate

NORM AREA

Overlapping: Labour Rights; Human Rights

RESPONSE

August 2019: Response received from Mr. Pablo E. Paez, Executive Vice President, Corporate Relations.

SUMMARY

The GEO Group (GEO) responded to investor enquiries concerning the alleged failure to prevent forced labour and respect the right not to be subjected to inhumane and/or degrading treatment at correctional and detention centres in the United States. GEO informed investors that the medical program at the Aurora ICE Processing Center provides 24/7 medical services; is supported by a team of approximately 50 medical positions and is fully accredited by the American Correctional Association and the National Commission on Correctional Healthcare. The Company also committed to protecting

those entering the facility and ensuring they are provided high-quality services in safe environments, and are treated with respect. Moreover, GEO committed to begin publishing an annual Human Rights Report and an ESG Report beginning in fall 2019. The Company also shared information related to the standards that govern the Voluntary Work Program, adding that wages are set by guidelines established by government authorities and that detainees have are not retaliated against or have to volunteer to work to have access to basic hygiene products and food. GEO stated that it is required to abide by performance-based national detention standards and guidelines.

ISS ESG is encouraged by GEO’s openness to dialogue with investors and will continue monitoring developments in its operations of the detention centres.

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
<b>The Goldman Sachs Group, Inc.</b>	United States, Malaysia, United Arab Emirates	Poor
<b>NORM AREA</b>	<b>RESPONSE</b>	
Anti-Corruption	August 2019: Acknowledgment received from Mr. Zachary Kolkin, Investor Relations.	
<b>SUMMARY</b>		
<p>The Goldman Sachs Group, Inc. decided not to respond to the investor enquiry because the 1Malaysian Development Berhad (1MDB) controversy remains an ongoing litigation. While ISS ESG acknowledges the pending litigation, the lack of response on related questions raised on the issues of the Company's policies and processes of global compliance was notable.</p> <p>A follow-up and subsequent reminder were sent to the Company in which ISS ESG sought answers on questions related to the Company’s global compliance policies in the aftermath of the controversy. No response has yet been received and ISS ESG will continue to monitor the developments in the litigation.</p>		

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
<b>UnitedHealth Group</b>	United States	Adequate
<b>NORM AREA</b>	<b>RESPONSE</b>	
Human Rights	August 2019: Response received from Ms. Frances Jacobs, Investor Relations.	
<b>SUMMARY</b>		
<p>In response to investor enquiries concerning reports of schemes to collect bonus payments such as enrollment fraud and concealing misconduct, UnitedHealth Group disclosed that as of March 2019 the lawsuit regarding risk adjustment factor is in discovery. The Company also stated that three of the Department of Justice's initial four False Claims Act theories have been dismissed. Moreover, in response</p>		

to allegations raised against its subsidiary PacifiCare for unfair claims practices, the Company stated that the penalty imposed remains to stand at zero and proceedings remain ongoing. The Company explained that certain claims against PacifiCare predated before it was acquired by the Company.

While ISS ESG appreciates UnitedHealth Group's openness to dialogue and transparency on each of these cases, the Company did not directly respond to the initial query regarding marketing practices and complaint and grievance mechanism. Therefore, a follow-up question was submitted to the Company for which a response is pending.

COMPANY	LOCATION	CORPORATE PARTICIPATION IN ENGAGEMENT
<b>Volkswagen AG</b>	United States, Germany	Good
NORM AREA	RESPONSE	
<b>Environment</b>	July 2019: Response received from Mr. Alexander J. Hunger, Senior Investor Relations Officer.	
SUMMARY		
<p>Volkswagen responded to the investor enquiry letter concerning the company’s involvement in the so-called Dieselpgate scandal in the United States and the European Union. The company stated that the recall of the affected vehicles in the United States (U.S.) has reached a threshold agreed with the authorities and that it has implemented a host of measures identified by the investigations both the U.S. and in Germany. Volkswagen reiterated it does not differentiate between consumers based on location but that it operates in accordance with the different national legal systems and technical requirements.</p> <p>ISS ESG appreciates the company’s openness to dialogue, the details provided, and is looking forward to continuing engagement as the situation develops.</p>		

## RESPONSIVENESS TO Q3 2019 ENGAGEMENT LETTERS

The following table summarizes the responsiveness to the engagement enquiries made in Q3 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	Reminders / Follow-up
Daimler AG	DE0007100000	Amber (●)	TRUE	Received August 2019	
EXOR NV	NL0012059018	Amber (●)	TRUE	Received August 2019	
Fiat Chrysler Automobiles NV	NL0010877643	Amber (●)	TRUE	Received August 2019	
First Pacific Co. Ltd.	BMG348041077	Red (●)	TRUE	Received August 2019	Follow-up sent
G4S Plc	GB00B01FLG62	Amber (●)	TRUE	Received September 2019	
Indivior PLC	GB00BRS65X63	Amber (●)	TRUE	Received August 2019	
Indofood Agri Resources Ltd.	SG1U47933908	Red (●)	TRUE	Received August 2019	Follow-up sent
ING Groep NV	NL0011821202	Amber (●)	TRUE	Received October 2019	
Loomis AB	SE0002683557	Amber (●)	TRUE	Received July 2019	
Oil Co. LUKOIL PJSC	RU0009024277	Red (●)	TRUE	Received August 2019	
PT Indofood Sukses Makmur Tbk	ID1000057003	Red (●)	TRUE	Received August 2019	Follow-up sent
PT Perusahaan Perkebunan London Sumatra Indonesia Tbk	ID1000118409	Red (●)	TRUE	Received August 2019	Follow-up sent
PT Salim Ivomas Pratama Tbk	ID1000119100	Red (●)	TRUE	Received August 2019	Follow-up sent
Renault SA	FR0000131906	Amber (●)	TRUE	Received October 2019	
The GEO Group, Inc.	US36162J1060	Amber (●)	TRUE	Received August 2019	
The Goldman Sachs Group, Inc.	US38141G1040	Amber (●)	TRUE	Acknowledged August 2019 / No Response	Reminder sent
UnitedHealth Group	US91324P1021	Amber (●)	TRUE	Received August 2019	Follow-up sent
Volkswagen AG	DE0007664039	Amber (●)	TRUE	Received July 2019	
Audi AG	DE0006757008	Amber (●)	FALSE	-	Reminder September 2019
CBS Corp.	US1248572026	Amber (●)	FALSE	-	Reminder September 2019
First Quantum Minerals Ltd.	CA3359341052	Amber (●)	FALSE	-	Reminder September 2019
Porsche Automobil Holding SE	DE000PAH0038	Amber (●)	FALSE	-	Reminder September 2019
Red Rock Resorts, Inc.	US75700L1089	Red (●)	FALSE	-	Reminder September 2019
Station Casinos LLC	US857691AF67	Red (●)	FALSE	-	Reminder September 2019
Tesla, Inc.	US88160R1014	Amber (●)	FALSE	-	Reminder September 2019

## REMINDERS & ESCALATIONS STATUS: Q3 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](#) once they are received and processed.

Company	ISIN	NBR Signal	Engagement Year/Qtr	Status / Outcome
<b>The following engagement enquiries were acknowledged but no response has been received yet</b>				
Grupo México S.A.B. de C.V.	MXP370841019	Amber (●)	2019-Q2	Reminder Sent November 2019
Southern Copper Corp.	US84265V1052	Amber (●)	2019-Q2	Reminder Sent November 2019
Evergy, Inc.	US30034W1062	Amber (●)	2019-Q1	Reminder Sent November 2019
<b>The following engagement enquiries were escalated to the CEO in Q3</b>				
Aegea Saneamento e Participações SA	US00775CAA45	Amber (●)	2019-Q1	<i>Responded - Meeting held</i>
China Petroleum & Chemical Corp.	CNE1000002Q2	Amber (●)	2019-Q2	No Response
Deutsche Bank AG	DE0005140008	Amber (●)	2019-Q2	No Response
Facebook, Inc.	US30303M1027	Amber (●)	2019-Q2	No Response
Formosa Plastics Corp.	TW0001301000	Amber (●)	2019-Q2	No Response
Lu Thai Textile Co., Ltd.	CNE000000ST8	Amber (●)	2019-Q2	No Response
ROSSETI PJSC	RU000A0JPVJ0	Amber (●)	2019-Q2	No Response
Tongling Nonferrous Metals Group Co., Ltd.	CNE000000529	Amber (●)	2019-Q2	No Response
Zijin Mining Group Co., Ltd.	CNE100000502	Amber (●)	2019-Q2	No Response
<b>The following engagement enquiries were escalated to the Board in Q3</b>				
Adani Enterprises Ltd.	INE423A01024	Amber (●)	2019-Q1	No Response
Contura Energy, Inc.	US21241B1008	Amber (●)	2019-Q1	No response
Enagás SA	ES0130960018	Amber (●)	2019-Q1	<i>Responded</i>
Exxon Mobil Corp.	US30231G1022	Amber (●)	2019-Q1	<i>Responded</i>
SNAM SpA	IT0003153415	Amber (●)	2019-Q1	No Response

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