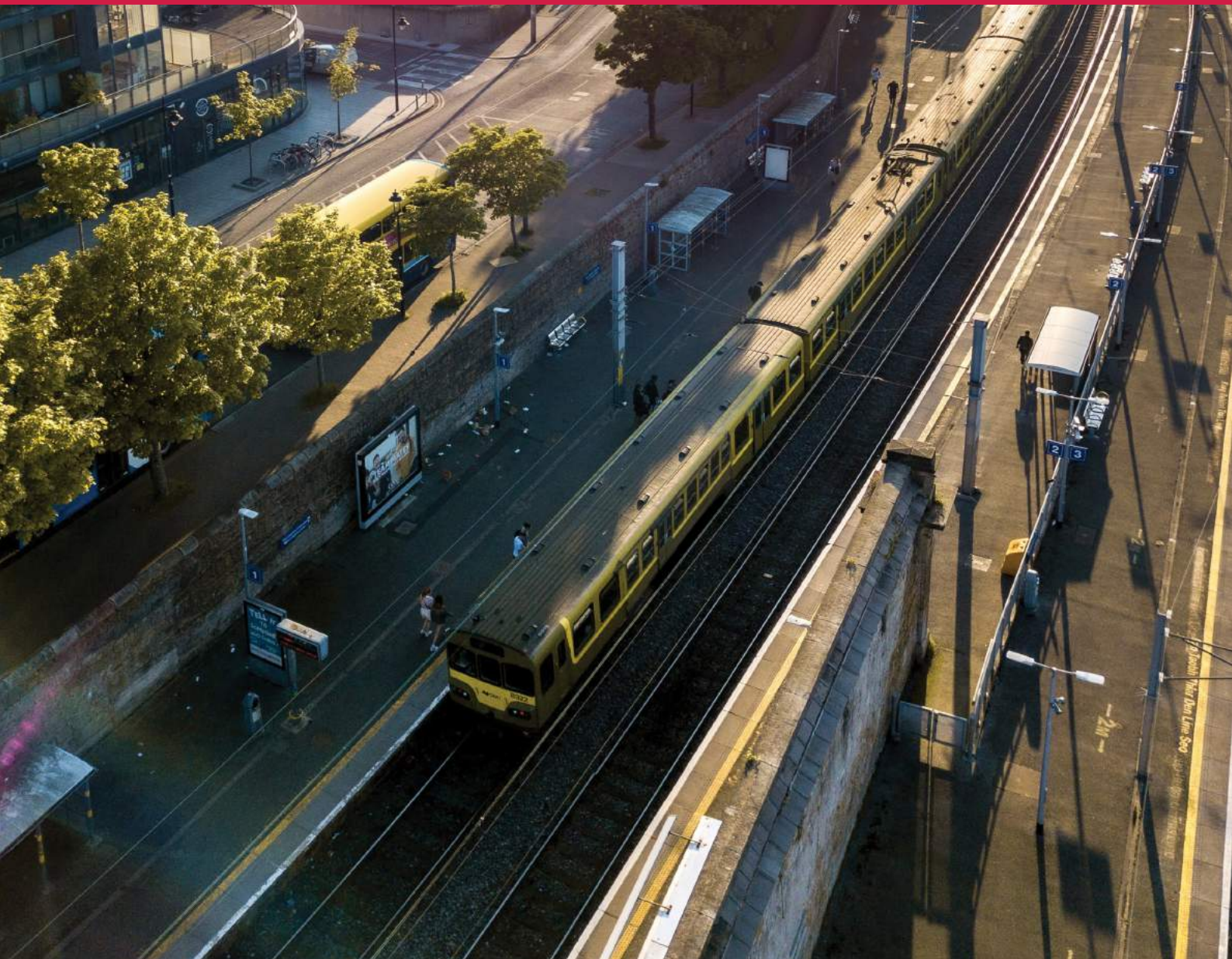


ALIGNMENT OF CLIMATE, ESG & FINANCIAL DISCLOSURES: GLOBAL SUSTAINABILITY STANDARDS AND REGULATIONS ALIGN TO PROVIDE GREATER ESG TRANSPARENCY AND FOCUS

CDP Ireland Annual Report 2022

Written on behalf of 680 investors with assets of over US\$130 trillion



February 2023

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CEO FOREWORD

MAXFIELD WEISS, EXECUTIVE DIRECTOR CDP EUROPE

“Every company that impacts our environment needs not only clear targets - but clear plans to deliver and evidence they are doing so.”

When CDP started more than 20 years ago, few companies, investors and cities were concerned about the impact of their operations on the planet. And few recognized that climate change, water insecurity, and deforestation would impact them – whether through the physical costs from disaster damage, or the risks from not transitioning business models at the pace to keep up.

We’ve come a long way since then. 2022 was a good year for CDP, with a record-breaking 18,700, companies, cities and regions disclosing environmental data this year - including 70% of European companies by market value and 116 in Ireland.

There is clearly an increasing level of environmental awareness and action among businesses in Europe - but not at the same pace across all European countries. With the ISSB climate standard and the world’s most ambitious new reporting regulation, the CSRD now agreed, we expect more to disclose high-quality, decision - useful data covering all relevant impacts on people and planet.

Science tells us that we are too close to the deadline for averting dangerous climate change unless the right goals and targets are set. Indeed, we’re currently headed for a 7% rise in carbon emissions instead of halving them this decade like we need to. As European and global mandatory disclosure legislation sets in, and corporate climate targets come under more scrutiny than ever, companies cannot continue to turn a blind eye to the bulk of their emissions.

The same applies for nature. 2022 was undoubtedly a year for nature with the new Global Biodiversity Framework, committing countries to protect 30% of land and sea by 2030 being agreed at the UN Biodiversity Conference (COP15). Through Article 15, biodiversity reporting

will soon become a business norm. Encouragingly, 7,700 of companies reported biodiversity data to CDP at our first time of asking. However, action needs to speed up. More than half (55%) of responding companies have not taken actions to progress biodiversity-related commitments in the last year. In addition, nearly three quarters (70%) of companies do not assess the impact of their value chain on biodiversity.

There is no route to 1.5°C without nature and biodiversity: emissions must be cut by half and deforestation eliminated by 2030, alongside achieving water security at the same time. Companies have the ability to make change happen at the required scale and speed – but they must start their journey now. The work of Clearstream and the CDP Ireland Network is therefore essential in supporting Irish companies and financial systems on this journey.

Every company that impacts our environment needs not only clear targets - but clear plans to deliver and evidence they are doing so. EU regulation will soon bite – it will soon be the law for companies to have clear plans that transition their business models onto a 1.5 °C footing. Recent CDP data shows only a tiny cohort of under 5% of companies in Europe disclose all the data we need to judge whether plans are credible for achieving 1.5C. And climate is of course just one component of companies’ broader challenge.

As expectations grow for companies to include nature in their broader transition planning, most companies still need to step up, and show investors, lenders and regulators that they are ready to act. Companies cannot reach net-zero without tackling their nature impacts: we don’t have time to waste.



CHAIRPERSON

EOIN FAHY, CHAIRPERSON OF CDP IRELAND NETWORK

“The number of companies reporting to CDP rose once again. Reporting to CDP is of course the absolute minimum first step that companies should take to demonstrate their stakeholders – their investors, their staff, and their customers - that they are taking their responsibilities seriously.”

In many ways, 2022 was a year of ‘normalisation’. The de facto end of the pandemic saw almost all restrictions on economic activity lifted in the early part of the year in most parts of the world, while in the financial markets interest rates and government bond yields rose from sub-zero to more ‘normal’ levels.

However, there is no “normal” when it comes to climate change.

We all know that business as usual is simply not an option for business, for policymakers, or indeed for individuals.

Urgent action and significant change is required across many aspects of our daily lives in order to avert the dire consequences of unmitigated climate change.

The UN’s Intergovernmental Panel on Climate Change – representing the collective judgement of the world’s scientists – told us in April that, “It’s now or never, if we want to limit global warming to 1.5°C. Without immediate and deep emissions reductions across all sectors, it will be impossible.”

However, we also need to remember that this is still possible. The same IPCC report stated that we already have the tools and know-how required to limit warming, and that we do have options in all sectors to at least halve emissions by 2030.

What we need to now is to take action, to use the tools that we undoubtedly have available to us.

This is where the work of CDP is so important, as companies reporting to it not only are telling their stakeholders what their emissions were in a format that allows ready comparisons with peers, but also what specific actions they have taken and plan to take to help the decarbonisation of society that is required. These commitments can then be assessed, measured and monitored

by stakeholders, and we as all know, “what gets measured gets managed”!

It is important also to highlight the issue of biodiversity, which in my view really came to the fore during 2022. Biodiversity is of course very closely linked to climate change, and I welcome the CDP’s leading role in enabling much-enhanced corporate reporting in this area.

It was also very encouraging to see that the 2022 United Nations Biodiversity Conference – the “other” COP – reached an agreement to halt and reverse nature loss, including putting 30 per cent of the planet and 30 per cent of degraded ecosystems under protection by 2030. And it was noteworthy that this event received mainstream media coverage for the first time – a signal of how seriously the biodiversity crisis has become.

Turning to the activities of CDP Ireland, I am pleased to report that the number of companies reporting to CDP rose once again. Reporting to CDP is of course the absolute minimum first step that companies should take to demonstrate their stakeholders – their investors, their staff, and their customers - that they are taking their responsibilities seriously.

Importantly, an increasing number of companies are putting in place scientifically verified Net Zero targets. To be properly verified, these targets must have specific plans for how Net Zero is to be achieved – a vague aspiration to get to Net Zero in thirty or forty years, is not in any way credible unless backed up by concrete proposals on how that will be achieved.

Each year CDP supports thousands of companies, cities, states and regions around the world to measure and manage their risks and opportunities on climate change, water security and deforestation.

“It’s now or never, if we want to limit global warming to 1.5°C. Without immediate and deep emissions reductions across all sectors, it will be impossible.”

More locally, through the CDP Ireland Network we encourage and support Irish stakeholders to engage with CDP, increasing Irish business transparency on environmental performance and promoting the image of Ireland as a sustainable place to do business.

In this context I warmly welcome the increased level of reporting to CDP that was seen in 2022.

We can report that the number of local and multinational companies reporting emissions in Ireland to CDP was 384 in 2022, while the number of Irish companies responding was 87, up from 55 in 2022.

We specifically welcome and congratulate the companies who reported to CDP for the first time last year. See list of first time responders on page 10.

The increased interest in – and commitment to – action on climate change among Irish corporates was further evidenced by the numbers attending the 2022 CDP training workshop delivered by Clearstream Solutions for CDP. More than 112 attendees registered for the event a rise of 107% compared to 2021.

I would like to close by thanking Kathy Ryan, of Irish Life Investment Managers, for agreeing to succeed me as chair of CDP Network Ireland. I know that Kathy will tremendous energy and insight to the role and wish her the very best in the role.

I would also like to thank the Environmental Protection Agency and the Sustainable Energy Agency of Ireland for their ongoing support of our work, and I am also very grateful for the contribution made by all the members of the Network Steering Committee during my term of office.

Special thanks also to Clearstream Solutions who provide support to the work of the Committee via secretariat services and technical advice.



NEIL DOVER

HP Country Manager,
Ireland



HP Ireland is part of a global technology business that promotes digital transformation through its workplace services and innovative range of technology products. Headquartered in California, HP Inc. has an international influence, operating in over 160 countries and employing over 50,000 professionals.

Well known for its commitment to corporate social responsibility, HP supports the local communities in which it operates. The company also has strong partnerships with Irish universities and research institutions, driving performance and supporting talent development in the country.

Cited as a leader in corporate sustainability by CDP, HP is honoured to be ever-present on its AAA list in recognition of our significant actions to address climate change, ensure water security, and safeguard forests. HP’s dedication to sustainable practices is also reflected by our place on the CDP Supplier Engagement Leaderboard.

HP has continuously acted in line with its comprehensive environmental and social impact agendas. Our goals focus on climate action, human rights, and digital equity across communities worldwide. Each year, we share our progress towards the set goals in our Sustainable Impact report.

The year 2022 marked significant progress in our climate action. HP has set an ambitious goal to reach net-zero greenhouse gas emissions across its entire value chain by 2040, with a 50% reduction

HP: STORIES OF A RESPONDER

in emissions by the end of this decade. We have achieved a 9% reduction in emissions since 2019 and are continuously working towards reducing our carbon footprint by rethinking our materials and implementing circular use.

Our product development teams are making remarkable progress in increasing the use of recycled plastic and reducing overall plastic waste. We have reduced single-use plastic packaging by 44% compared to 2018 and increased the use of post-consumer recycled content plastic across our print product portfolio and personal systems to 13%, with a goal of 30% by 2025. In addition, we are making waves in the sustainable packaging market with our 3D-printing technology and the acquisition of a zero-plastic paper bottle inventor.

All HP brand paper-based packaging, paper for office, home printers, supplies, PCs, and displays have been derived from recycled or certified sources since 2020. To counteract deforestation that may result from the use of non-HP paper in our printers, we invest in responsible forest management and restoration programs. HP has helped restore or responsibly manage 14,420 hectares (35,633 acres) of the forest, roughly the size of the city of Dublin. Moreover, we pledged US\$80M to support WWF in addressing the potential impacts on forests from printing with HP printers.

At HP, we are also dedicated to managing and reducing water usage globally. We have been publishing our water footprint report since 2013 and have set a goal to decrease potable water consumption by 15% by 2025 compared to 2015. Furthermore, we work with our suppliers to improve their water reporting and to encourage better water management practices.

Our focus on sustainability does not stop with ourselves. We like to work with partners and suppliers who share our values, and we go the extra mile to include our community in our sustainability programs. One such example of partnership is our Reseller Channel Program “Amplify”. HP has expanded its Amplify Impact channel partner program to empower over 10,000 partners in 40+ countries to propel their own sustainable impact journeys while also training their internal sales forces in the value products and services which deliver outcomes for both the customer and HP partner.

Looking to empower communities through education, HP Ireland has supported the European Commission’s Erasmus+ programme “Digital Schools Award” by partnering with leading technology companies and national education agencies to provide pupils with the skills to flourish in the highly digitised world.

The programme promotes a holistic approach to digital education, with everyone in the school getting support and developing confidence to adopt best practices. Of a hundred participating secondary schools in five European countries, 79 received the top award. Notably, 15 Irish secondary schools are among the top-awarded institutions.

While HP has driven enormous change in sustainable practices in Ireland and worldwide, we recognise there is more work ahead. Steadily, we are working towards becoming the world’s most sustainable and just company that aims to democratise digital opportunities, reverse climate change, and protect human rights. With corporate social and environmental responsibility engraved into the very fabric of our function, we are happy to remain transparent about our efforts while moving toward our goals.

[Learn More HP Sustainable Impact Report](#)



HIBERNIA: STORIES OF A RESPONDER



NEIL MENZIES

Director of Sustainability

hibernia

Hibernia Real Estate Group owns and develops property. Our portfolio is based in Dublin where we specialise in city centre offices. We use our knowledge and experience of the Dublin property market to upgrade buildings or deliver new ones at appropriate times in the property cycle and to grow our income through active asset management. Where possible, we seek to own clusters of office assets to enhance the facilities and amenities we can provide occupiers.

In 2021, we published Transforming Dublin Responsibly, our Sustainability Statement of Intent, to shape our sustainability ambitions out to 2030 and to deliver long-term sustainable value for our stakeholders. One of the key ambitions is to become a net zero carbon and climate-resilient business by 2030, ensuring that our assets are as prepared as possible for climate change thus enhancing their attractiveness to our clients and local communities. Achieving our climate-resilience targets will positively impact our two other ambitions; to provide spaces that prioritise the environment, health and wellbeing in our buildings and, to create a positive long-term social impact.

Recognising that more than two-thirds of our operational emissions come from occupier-controlled areas, the scope of our net zero carbon commitment includes

activities in areas we do not control, as well as those arising from our own operations. To build capacity for implementing change with our occupiers we have taken two actions. Firstly, we have engaged CoolPlanet to create occupier energy use dashboards, and secondly, we have rolled out training with Clearstream Solutions for occupiers, and a number of suppliers, on carbon reporting and reduction.

The pathway outlines a number of ways by which we plan to achieve our targets, from adopting a design-for-performance approach from setting energy intensity targets on all new major developments to identifying existing properties where we can retrofit all-electric heating and cooling systems and demand-controlled ventilation upgrades. How we power our buildings and development projects has also been a key consideration. Since 2019 we have procured 100% of electricity from renewable sources for our managed portfolio and we are actively encouraging our occupiers to do the same where they manage their own energy procurement.

Reducing the embodied carbon of our new developments and major refurbishments is equally as important. We have gained a better understanding of the embodied carbon impact of the major schemes we have delivered over recent years and have mandated that whole life carbon assessments are carried out, integrated at the design stage, for all future projects of scale. All partners in the development process are required to identify technologies and construction methods that will assist in driving down embodied carbon.

During 2021, we set up our Carbon Reduction Fund. An internal price of carbon of €75 per tonne is levied on the embodied carbon of new developments and refurbishments. This provides seed funding for energy improvements in existing buildings to reduce emissions in line with a 1.5 degrees Celsius global warming scenario. By doing so, we are actively incentivising the use of lower carbon materials and processes on all construction projects.

To add credibility to our net zero carbon pathway, we have signed up to the World Green Building Councils Net Zero Carbon Buildings Commitment and Better Building Partnerships Net Zero Carbon Commitment.

We report on how we are progressing against our overall Sustainability Strategy and Net Zero Carbon Pathway in our annual Sustainability Report. The Sustainability Report is aligned with the latest Global Reporting Initiative (GRI) guidelines and covers the ESG impact categories, as confirmed by our materiality assessment, which we revised using a third party in 2022.

Our CDP journey began in 2020 when we were requested by investors to submit to the climate change questionnaire. We received a B- in our first response but through development of our Net Zero Strategy, completion of climate scenario modelling and asset specific climate risk analysis as part of TCFD alignment, we have improved our CDP score and received an A- 2022. The CDP process has allowed Hibernia Real Estate Group to improve our Net Zero Strategy by identifying gaps and highlighting areas of improvement.



ANNABEL FITZGERALD

ESG & Corporate
Communications Manager

energía group

Energia Group is a modern and innovative energy company focussed on playing a significant role in the achievement of the energy transition on the island of Ireland.

We currently supply approximately 20% of total electricity requirements and are responsible for approximately 25% of wind power capacity installed on the island.

Through our renewables, flexible generation and customer solutions businesses we are committed to the decarbonisation of the energy system across the island of Ireland. By 2030, we plan to have invested an additional €3bn in renewable technologies as part of our Positive Energy investment programme. We are progressing with the development of offshore and onshore wind farms and solar farms, battery storage solutions and green hydrogen production. It is anticipated that our investment programme will add approximately 1.5 GW of additional renewable capacity to the system by 2030; that's enough to power more than 1 million homes and businesses. As suppliers of electricity and gas to over 800,000 homes and businesses across the island of Ireland, we understand the critical role that our customers can play in the decarbonisation

ENERGIA GROUP: STORIES OF A NEW RESPONDER

of the energy system. We believe that empowering our customers through the delivery of innovative and effective solutions such as EV charger installations, energy efficiency upgrades and microgeneration are key to facilitate the achievement of Government targets and to maintain momentum towards the overall objective of Net Zero.

In 2021, our first Responsible Business Report included our corporate disclosures across our environment, social and governance performance. In 2022 we evolved our reporting and set our own targets. Following extensive Group-wide Scope 1 & 2 emissions analysis, we committed to reduce the carbon intensity of our electricity generation by 50% by 2030, when compared to 2019/20 levels. The achievement of this medium-term target will place the Group on a pathway to achieve Net Zero by 2040 and is also aligned to our commitment to the UN Sustainable Development Goals (SDGs). By aligning our activities to the broader global effort to deliver the SDGs we are demonstrating our ongoing commitment to climate action, as well as to our 1,000 plus employees and to the communities in which we operate and serve.

Energia Group has a long-standing record of working in collaboration with community groups to enhance local areas and to benefit local people. To date, we have invested more than €3 million in communities across the island through our wind farm community benefit funds. This commitment has been recognised, with the Group receiving a wide range of awards for sustainability, innovation in energy supply, customer service, sponsorship and community engagement. We are also 1 of only 45 companies in Ireland to have been awarded the Business Working Responsibly Mark by Business in the Community Ireland.

We are firmly focused on the future, and our commitment to our customers, our people and the communities we serve. We achieved a B- rating in our first CDP response in 2022 which has set us on an ambitious pathway to progress our climate action targets and we are continuing to develop our scope 3 emissions assessment. In addition, we are preparing to report in line with the Corporate Sustainability Reporting Directive and we are assessing the alignment of our activities to the EU Taxonomy.

We are looking forward to participating in the CDP network in the coming years as we continue to play a leading role in the decarbonisation of the energy system across the island of Ireland.



COMMENTARY FROM EPA

LAURA BURKE



LAURA BURKE

Director General,
Environmental Protection Agency



“The high scores attained by Irish companies and the continued commitment of companies to build on their efforts demonstrates a commitment to a long-term reduction in emissions as well as a model for others to follow.”



2022 saw the impacts of climate change coming into further focus with a year of record-breaking extreme weather across the world, including Europe recording its hottest summer on record.

The Intergovernmental Panel on Climate Change (IPPC) report on Climate Mitigation published in 2022 outlines the nature and extent of the causes of climate change at a global level and reinforces the urgent need for action to reduce greenhouse gas emissions. Stating that unless there are immediate and deep emissions reductions across all sectors, 1.5°C is beyond reach. There are options available now in every sector that can halve overall emissions by 2030. The time for action is now.

In 2022 the IPPC also reported on Climate Change: ‘Impacts, Adaptation and Vulnerability’ which showed the unequivocal evidence of climate change globally and the impacts on human and natural systems. Its message is clear; delaying action on adaptation and mitigation will miss a brief and rapidly closing window of opportunity to secure a liveable and sustainable future for all.

In 2022 Ireland moved forward in its commitment on climate action. The adoption of carbon budgets and associated sectoral ceilings sets a clear challenge for all sectors in terms of emissions reductions and implementation of measures by the end of this decade, with a near term milestone of 2025.

Ireland’s greenhouse gas emissions data published in 2022 highlighted the impact of a return to coal use in electricity generation, together with continued growth in emissions from the agriculture sector and a partial rebound in transport emissions following the easing of COVID

restrictions, have combined to deliver an increase on pre-pandemic levels of emissions. The data show the scale of change needed within and across all sectors of Ireland’s economy to make sustained progress in reversing this trend and to meet our EU commitments and National greenhouse gas emission reduction targets.

We know from the EPA’s Four Ireland’s Report, as part of the Climate Change in the Irish Mind Study, that the majority of Irish people are worried about climate change and are supportive of climate action. An overwhelming majority of Irish people falling within the Alarmed (36%) or Concerned (48%) audiences. The study also shows a willingness of the public to support or punish companies base on the steps taken to address climate change.

Therefore, it is positive to see the continued growth in the numbers of Irish companies participating in the Carbon Disclosure Network. The disclosure of emissions provides an important mechanism to demonstrate emissions reductions across wide-ranging industrial sectors and supply chains at a national and international level. The high scores attained by Irish companies and the continued commitment of companies to build on their efforts demonstrates a commitment to a long-term reduction in emissions as well as a model for others to follow.

The EPA welcomes this report and is happy to continue its support for the network and its promotion & training activities in the support of existing and new companies in their decarbonisation and reporting activities.

COMMENTARY FROM SEAI

Message from William Walsh, CEO Sustainable Energy Authority of Ireland

The role for business in Ireland’s energy revolution



WILLIAM WALSH

CEO, Sustainable
Energy Authority of Ireland



“It is absolutely essential that businesses innovate more and challenge these norms within a strong and ambitious long-term climate action strategy.”



It is generally accepted that businesses that grow during uncertain times exhibit certain behaviours. They take stronger action striking a balance between the strategic business direction, and risk-taking with investment in business change, including R&D, innovation, people, process, and technology. We have seen this time and time again during several periods of considerable uncertainty including the dotcom bubble, financial crises and more recently, Covid. In SEAI, we often reflect on the macro response to climate action being a slow burner. The cause and impact of carbon emissions on our climate and ecosystem is proven and respected, it will be a mammoth challenge and requires a similarly scaled response.

The ability of businesses and society to react to unforeseen and short-term shocks is demonstrated and, in the case of Covid, to adapt to new norms. We also see how international coordination and open innovation rises to meet these challenges. The shocks above, transpired rapidly, were in reality relatively short-term and required rapid business responses. Such a proportionate response to the climate change crises has yet to happen. Unfortunately, while we may all know that it will have a profound impact, it is not yet felt as a crisis in the short-term and thus there is less sense of urgency. When climate change is not considered in this way, it is not treated as a business priority or existential threat. In the last number of years however, we have started to see this changing through first and early adopters, and evidence of this can be seen through the important reporting of the CDP.

In Ireland, the introduction of new and legally binding carbon budget ceilings is a genuine game changer. Naturally we see some response latency across all sectors and of course they are seriously challenging. The government’s Climate Action Plan sets a trajectory of policy action to 2030 to be implemented across all sectors, including industry and business.

So, what should we expect in terms of short-term actions?

- Businesses developing their own climate action strategy that is wholly integrated into the business strategy and incorporating the value-chain.
- Businesses developing own climate action roadmaps, identifying strategic projects and phased investment commitment.
- Not forgetting that energy efficiency remains a major part of the solution, providing best value for money and maximises benefit of renewable technology investment.
- Focussing initially on energy decarbonisation will yield best outcome and where the greatest impact will be achieved.

In the longer term, it will be necessary for all sectors to reimagine their business in a zero-carbon setting. Currently climate considerations aren’t typically integrated into business proposition and, as a consequence, often reside within CSR and ESG programmes. And unfortunately, in some cases it can be little more than ‘green washing’ and ensuring the best interests of the shareholder. Capital investment must be financially viable and primarily focuses on discrete investment in energy efficiency, special interest building upgrades and energy supply strategies. A critical development will be when the benefits of decarbonisation can be monetised. It is absolutely essential that businesses innovate more and challenge these norms within a strong and ambitious long-term climate action strategy. SEAI will support the business sector through new decarbonisation agreements from 2023. SEAI knows it will take more time, but we are confident change will come and quickly, what our statement of strategy calls the energy revolution.

IRELAND OVERVIEW OF THE 2022 CLIMATE CHANGE RESULTS

Top Irish Companies by score

Top Irish responding Companies

A
Accenture*
Trane Technologies*
A-
AIB Group Plc
An Post
Cairn Homes Plc
Córas Iompair Éireann Group (CIÉ)
CRH Plc
Experian Group
Hibernia REIT Plc
Kerry Group Plc
Kingspan Group Plc
Seagate Technology Plc
Smurfit Kappa Group Plc
* CDP A List
In alphabetical order

New Climate Change Responders

ABP Food Group	HK International
Abtran	Icon Plc
Arthur Cox	Inizio Group Ltd
ATA Group	Irish Water Company
Bidvest Noonan	McKeon Construction Ltd
Cental Engineering Ltd	Millington
Colorman	National Treasury Management Agency
CPL Resources Plc	Ornua
Dawn Meats Group Ltd	PM Group
Dexgreen Ltd	Richard Nolan Civil Eng Lt
E + I Engineering	Sharp Services LLC
EirGrid plc	Starcom Ireland Ltd
Element Six	TAM Ireland Services Ltd
Energia	Truata Limited
Fónua Ltd	Version 1 Software Ltd
Glen Dimplex	Winters Plant Hire Ltd
Globoforce	

The analysis presented in this report is a brief summary of a subset of the data available through CDP. We encourage all readers of this report to view the full corporate responses individually from our website. Enhanced and unlimited access to the data is available through the CDP analytics tool which makes benchmarking and trend analysis simple via a series of interactive dashboards and export functions. Different versions of the tool are available for investors and companies. Visit www.cdp.net to find out more.

In 2022, a total of 384 companies reported to the CDP Climate Change programme that are either headquartered or operating in Ireland, an increase of 25%. There were 87 Irish companies who reported as part of this group, an increase of 58% from 2021. This increase is partly due to a change in the CDP system which encouraged Supply Chain responders to also respond to the Climate Change questionnaire. CDP sent a request to 57 Irish listed and 'companies of interest' on behalf of investors, of which 39 responded. This means that 48 Irish companies completed a Climate Change response voluntarily, a positive trend. The top Irish companies by CDP score all scored an A-, except for Accenture and Trane Technologies who achieved a coveted place on the CDP A list. This is a welcome return for Irish companies to the CDP A list, which consisted of 292 or 7%

of companies globally. Irish companies generally perform well compared to other regions with 68% of Irish companies achieving a B- or higher in 2022, compared to 60% globally, but behind Europe at 73%. CDP rewards reporting companies for taking measurable action.

In 2022 there were a total of 33 companies in Ireland with an approved Science Based Target, while an additional 33 have committed to setting one. 70 % of Ireland reporting companies complete an annual 3rd party verification of their emissions up from 66% last year. An encouraging 49% of responding companies have a Climate Transition plan that aligns with a 1.5% world, with 67% of these plans published. Biodiversity is an increasingly important topic that is new to the CDP Climate Change questionnaire. This section highlighted that only 12% of reporting companies assess the impacts on biodiversity in their value chain.

It is becoming increasingly important for companies to report to more than one CDP programme. In 2022 22% of companies responded additionally to either Forest or Water Security, a small decrease on last year. Finally, supplier engagement is becoming a key lever in emissions reduction. There has been a 65% increase in Supply Chain responders in 2022 with 84 on Climate Change, 13 on Water Security and 5 on Forests. This increase is also due to changes in the CDP system, but highlights the role CDP reporting as a tool to decarbonize the supply chain.

IRISH COMPANIES PERFORM WELL COMPARED TO INTERNATIONAL RESPONDERS

Chart 1:
Companies scores - Global

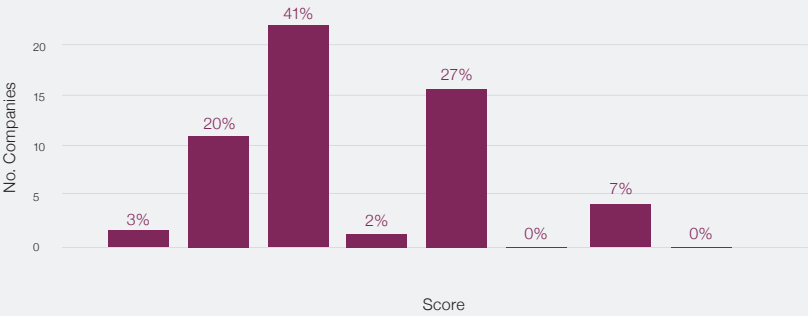
Distribution of Climate Change Scores for All Companies



From a total of 4117 publicly scored responders.

Chart 2:
Companies scores - Ireland

Distribution of Climate Change Scores for Companies in HQ Country (Ireland)



From a total of 59 publicly scored responders.

THE CDP IRELAND NETWORK UPDATE 2022

ALIGNMENT OF CLIMATE, ESG AND FINANCIAL DISCLOSURES: GLOBAL SUSTAINABILITY STANDARDS AND REGULATIONS ALIGN TO PROVIDE GREATER ESG TRANSPARENCY AND FOCUS

The CDP Ireland Network Purpose

The CDP, formerly the Carbon Disclosure Project, is an international non-profit that drives companies and governments to reduce their greenhouse gas emissions, safeguard water resources and protect forests. Voted number one climate research provider by investors and working with more than 680 financial institutions with US\$130+ trillion in assets, CDP leverages investor and buyer power to motivate companies to disclose and manage their environmental impacts. Over 18,700 companies with over 60% of global market capitalization disclosed environmental data through CDP in 2022 an increase of 36% on 2021. The CDP platform has become one of the richest sources of information globally on how companies and governments are driving environmental change. CDP is also a founding member of the Science Based Targets Initiative, SBTi. Visit <https://cdp.net/en> or follow us @CDP to find out more.

In 2014, following discussions with CDP headquarters and several leading Irish organisations, the **'CDP Ireland Network'** was launched, working in partnership with CDP globally and funded by the generous support of SEAI, EPA and our committee members. The CDP Ireland Network www.cdpirelandnetwork.net is a network established to support the environmental disclosure and performance of Irish companies through the use of the CDP framework and platform. The network brings together diverse set of stakeholders, including corporates, investors, SMEs, service providers, public and private bodies, government and CDP with the express aim of encouraging companies and cities to measure, manage and disclose vital environmental information.

As an active open network with a database of over 1,500 individuals who have participated in our events to-date, the network is managed by a steering

committee, consisting of representatives from the Irish divisions of reporting companies, investor companies including NTMA, KBIGI, and ILIM, and from public and private bodies with an interest in helping Irish based companies to address climate change.

The role of the CDP Ireland Steering Committee is to promote and support measurement, disclosure and reporting of environmental data across a network of interested companies. This is achieved through a range of outreach activities defined by the steering committee; activities to promote and raise awareness of climate change, hosting of best practice workshops, attending conferences and events on behalf of CDP, representing CDP on industry and Government initiatives, and the organisation of local CDP marketing and online networks. The CDP Ireland network is an open network with no membership fee. We promote all of the CDP programs in Ireland, encouraging Irish companies to respond on climate change, water & forestry. We publish a CDP Ireland Climate Change report annually showcasing best practice in climate action. And we engage directly with the Investor and Responder communities to promote the benefits of CDP as the leading and most credible global platform for environmental disclosure.

Our Chair and Vice-Chair serve for either 1 or 2 years; Eoin Fahy from KBI Global Investors was our Chairperson for 2021/2022, and Kathy Ryan of ILIM is taking on the role of Chair in 2023. On behalf of the committee, I would especially like to express our appreciation to Eoin for his passionate and dynamic leadership over the past two years. His clarity in explaining the value of CDP disclosures as part of the Investment process has encouraged many companies to take action.

Key achievements in 2022

The title of last year's report was 'From ambition to action: Irish companies progressing from climate target setting to decarbonisation action plans'. This report continues to highlight the performance of a growing number of Irish companies who responded to CDP, the world's leading framework for corporate environmental disclosure, and outlines the progress they are making on this critical issue. As is abundantly clear from the latest 2022 IPCC Climate Change report, time is rapidly running out if we are to avoid irreversible catastrophic global warming. This CDP Ireland report shines a light on how business must now urgently transition from ambitious target setting to the implementation of decisive climate action plans.

Corporate Climate Change disclosure is now firmly a Boardroom issue for all organisations. Encouraged by investor scrutiny, customer competitive focus and pushed by EU, US and UK regulation, the topic of climate change has moved from the sustainability office onto the board room table and is now an integral part of the annual reporting cycle of many Irish companies. However, while we have seen increasing alignment between the global ESG reporting standards, such as EFRAG, SEC and ISSB, and financial reporting standards, there remains a high level of uncertainty as to the pathway required by all companies when disclosing non-financial issues. In advance of greater global sustainability reporting regulation, CDP will continue to work closely with these standards organisations to provide a more consistent best practice approach to environmental disclosure now, and into the future.

2022 saw a continued increase in the numbers of Irish companies disclosing to CDP and in particular setting meaningful climate targets. Despite the recent global

challenges, there has been a massive 60% increase in Irish companies reporting to CDP in over the two-year period 2020-2022.

Companies are scored based on CDP's transparent scoring methodology covering: comprehensive disclosure of environmental impacts, risks, opportunities, governance and actions; awareness of environmental risks and how they relate to their business; demonstrating management of these environmental risks and evidence of best practice associated with environmental leadership and target

setting. CDP as a reporting platform continues to provide a very useful framework for companies to assess themselves against the latest best-practice in environmental disclosure and performance. Going forward, we will see a broader of environmental and ecological issues covered in the CDP Climate Change questionnaires, in recognition of the increasing concerns around biodiversity impacts.

Fueled by initiatives such as the Science Based Targets Initiative (SBTi), Net Zero initiatives, Task Force on Climate Related Disclosure (TCFD), Carbon Pricing, EU Taxonomy and local initiatives such as BITCI's Low Carbon Pledge, companies reporting to CDP now have a clearer pathway as to the actions that need to be taken. Leading environmental action is positively correlated with financial success. The CDP A List companies have a combined worth of US\$15 trillion in market value.

Some Highlights from 2022

- Over **384 global companies** now report their Irish emissions to CDP under the Climate Change program and increase of 25%
- The focus on environmental issues grows, with **87 Irish owned or registered** companies now reporting, an increase of 58% on 2021.
- The top **13 Irish** companies were **all scored 'A-'** except for Accenture and Trane Technologies who achieved an A. Only 292 companies globally achieved an A in 2022,
- Irish companies generally perform well** compared to other regions, with 68% of **Irish companies** achieving a B- or higher in 2022, compared to 60% globally.
- Setting meaningful climate targets continues to be a priority for many Irish companies. At time of writing, **33 Irish companies had set an approved science based target, with an additional 33 committed** to setting a **Science Based Target** over the next two years
- CDP requested a response from 57 PLC and public interest entities on behalf of investors. **68% responded.** This compares with only 30% seven years ago when we started to measure this.
- We have continued our close cooperation with **Sustainable Finance Ireland**, hosting the Corporate Sustainability event during its highly successful 'virtual' **Climate Finance Week** in November 2022. Our **'Latest Trends in Corporate Climate Change Reporting'** event was extremely well attended. It included contributions from CDSB, GRI and AIB.
- We continue our outreach to cooperate with other like-minded organisations. We are actively working with The **Dublin Chamber of Commerce** and other networks to share best practice.
- Supplier engagement** is recognised as an essential action to reduce Scope 3 emissions. **84 Irish companies** completed a supply chain climate change response, an increase of **65% from 2021**. This is due in part to changes in how companies can report to both the Climate Change and Supply Chain programs in the CDP system.
- In October, we hosted a high-profile **Supply Chain Event** with excellent contributions from Neil Menzies, Hibernia REG, Shane O'Reilly, KPMG, Des Ferris, Keelings with Aoife Devaney, CDP Europe.
- In terms of **capability building and training**, we once again hosted our very successful annual CDP Reporter training in May 2022. Muriel e Bakker from CDP HQ, supported by Gráinne McIvor and Gavin Whitaker from Clearstream Solutions delivered a very informative session for 25 participants both experienced, as well as new responders. In addition, we also delivered an Advanced Responder training on how to improve your CDP score. Stay tuned for our 2023 training programmes in April and May.
- We now have over 1,500 contacts on our database, 165 members on our LinkedIn group **'CDP Ireland Network'** and a growing Twitter following **@CDPIrelandnet**. Please follow us for details on upcoming training and events.
- 3-Year Plan finalized in March 2022:** To guide us over the coming three years, the CDP Ireland Network Committee has agreed a plan of activities from 2022-2025. The plan commits us to a programme of activity and outreach to accelerate Ireland's low carbon transition.
- We continue to update our website www.CDPirelandNetwork.net where you will find this report. Your input is always welcome, and we can be contacted at brian@clearstreamsolutions.ie or via our social media links above.

CDP IRELAND NETWORK 2022 EVENTS

CDP Ireland Network 2021 Report Launch, 11th March 2022

Welcome Brian O’Kennedy, CDP Ireland Network Steering Committee 2022

Introduction Eoin Fahy, Chairperson of CDP Ireland Network

Opening Remarks Colin Hunt, Chief Executive Officer at AIB

Address Maxfield Weiss, Executive Director, CDP Europe

Panel Discussion Mary Whitelaw, Director of Corporate Affairs, Strategy & Sustainability at AIB | Sean McKeon, Company Secretary and Head of Risk & Compliance, Dalata | Aisling McCarthy, General Counsel and Company Secretary, Unipharm | Ché McGann, Clearstream Solutions Panel Session Moderator



Capability building and training events

CDP Reporter training, 18th May 2022

Hosted by the CDP Ireland Network.

Nicole Morejón CDP HQ, supported by Gráinne McIvor and Gavin Whitaker from Clearstream Solutions.

Advanced Responder Training, 01st June 2022

Hosted by the CDP Ireland Network and delivered by Gráinne McIvor and Gavin Whitaker, Clearstream Solutions.



Climate Finance Week, 20th October 2022

How to Achieve Net Zero Emissions

Hosted by the CDP Ireland Network

Panel contributions from Neil Menzies, Director of Sustainability, Hibernia Real Estate Group Limited, Shane O’Reilly, Director, Sustainable Futures, KPMG, and Des Ferris, Technical Director, Keelings with Aoife Devaney, Supply Chain Programme Account Manager at CDP Europe.



CDP Ireland Network Aims and Objectives

To develop an economic system that operates within sustainable environmental boundaries and promotes the development of Ireland as low carbon economy.

- ▶ To **drive action** by companies and cities to reduce greenhouse gas emissions, safeguard water resources and prevent the destruction of forests.
- ▶ To **promote, encourage and support all Irish stakeholders** in particular investors and companies to engage with CDP and other organisations seeking to minimise climate change impacts.
- ▶ To increase all Irish organisations’ **transparency on environmental performance** in order to enhance resilience and comparability.
- ▶ To make **environmental performance central to investment and business decisions.**
- ▶ To **share best practice** in GHG management and policy from both Irish and international organisations.
- ▶ To provide a **common and consistent framework** for all Irish companies irrespective of size to measure and report their GHG emissions.
- ▶ Assist in promoting the image of Ireland as a sustainable place to do business and to **help our companies to achieve a competitive advantage** from their initiatives by sharing global best practice.

A LIST MEDIA COVERAGE 2022

Top Irish companies reduce their emissions footprint by a third

CDP Ireland Network says more companies here are participating in climate change reporting

Ireland's top companies reduced their emissions footprint by a third last year while more businesses participated in climate change reporting, according to the Irish branch of the Carbon Disclosure Project (CDP).

However, CDP Ireland Network cautioned that some of the improvement may have been driven by "Covid-related reduced activity".

The top-performing Irish corporates named in its annual report for 2021 included AIB, CRH, Kerry, ESB, Glenveagh and Kingspan.

It said average operational carbon emissions from Irish companies reporting on their environmental performance fell by more than a third last year.

Average scope 1 (direct CO2 emissions produced by the company's activities) and scope 2 emissions (emissions produced indirectly, typically by purchasing energy) per company totalled 32,577 tonnes last year, compared with 50,483 in 2020, a decline of 36 per cent, it said.

"The trend over the past four years shows that in general companies are making good progress from merely setting climate change targets, to implementing on initiatives to reduce their environmental impact, although the decline in average emissions for 2021 was helped by some Covid-related reduced activity and the smaller size of some of the new responder companies," it said.

Decarbonisation of the Irish electricity grid and improved fuel efficiency have played a significant role in this reduction, it added.

The group's report showed 55 Irish-headquartered companies reporting under CDP's rigorous evaluation procedure, an increase of 17 per cent on the previous year.

Some 79 per cent of participating Irish companies achieved a B- grade or higher compared with 69 per cent across Europe and 66 per cent globally.

CDP is a global non-profit that operates an environmental disclosure system which evaluates more than 13,000 companies each year.

Data

"The increasing number of companies participating is a sign they recognise the need to provide verifiable third-party data on their sustainability progress to investors and customers," it said.

New respondents here include Paddy Power Betfair owner Flutter Entertainment, Grafton Group and Aer Cap Holdings.

While the report's headline findings point to an improved focus and attention on addressing climate change from Irish companies, the CDP cautioned, however, that the climate issue here "is far from under control".

It highlighted the need for companies to accelerate their decarbonisation efforts, in particular in their scope 3 value chain emissions, "if we are to avoid the catastrophic impacts of irreversible global warming".

Eoin Fahy, chairman of the CDP Ireland Network, said: "It is great to see the CDP Ireland Network going from strength to strength, with a 17 per cent increase in Irish companies reporting in 2021."

"This is a minimum first step companies should take to demonstrate to their investors, their customers, and their staff that they are taking their responsibilities seriously," he said.

Brian O'Kennedy executive director of CDP Ireland Network said: "As investor and customer scrutiny of sustainability measures increases it is clear that environmental reporting is now a key feature of many Irish companies' annual reporting cycle."

The Irish Times 10/03/2022

THE IRISH TIMES

Irish companies reduce operational emissions

The operational emissions coming from Irish firms taking part in a global environmental disclosure scheme fell by 36% last year.

The annual report of non-profit organisation CDP also shows that eight new Irish companies, including Paddy Power owner Flutter, Woodies owner Grafton and aircraft leasing company AerCap, joined the initiative, an increase of 17%.

However, 21 other large Irish businesses failed to respond to requests to report their emissions, something that CDP Ireland Network claims will put them at a competitive disadvantage.

"This is a minimum first step companies should take to demonstrate to their investors, their customers, and their staff that they are taking their responsibilities seriously," said Eoin Fahy, chairman of the CDP Ireland Network.

"An increasing number of companies are putting in place scientifically verified Net Zero targets, with specific plans in place for how these will be achieved."

"Vague aspirations to go green are no longer good enough; it must be backed up by concrete proposals."

The report shows that average Scope 1 and Scope 2 emissions per responding firm came to a total of 32,577 tonnes of CO2 equivalent in 2021.

This compares to 50,483 a year earlier, a decline of more than a third.

However, some of the decrease is the result of a Covid-19 pandemic caused slowdown in activity, with the smaller size of some of the new firms reporting also dragging the average down.

79% of Irish respondents received a B-grade or higher compared to 69% across Europe and 66% globally.

The top ten Irish companies for reducing emissions included Accenture, AIB, CRH, ESB and Glenveagh Properties.

CDP Ireland said 19 companies that report to it have received approval under the Science Based Targets Initiative, which sees companies set targets required to keep global temperature increase well below 2 degrees, while a further 25 have committed to setting them.

But CDP Ireland claims much more has to be done, as just 1% of firms globally who submit their emissions data have given their investors a credible plan for transitioning to low-carbon use.

The organisation says companies need to speed up their decarbonisation plans, particularly around Scope 3 value chain emissions.

"With more transparency comes bolder ambition, as companies recognize the benefits of acting early to mitigate the risks of business as usual and take a leadership position," said Maxfield Weiss, Executive Director of CDP Europe.

RTE 10/03/22

RTE



STEERING COMMITTEE 2022

We would like to express our appreciation to the EPA and SEAI for their continued financial support and participation in the Network. We would also like to thank KPMG Sustainable Futures and ILIM for their support in publishing this report and NTMA for hosting the launch.

Our Chairperson for 2022 was Eoin Fahy, KBIGI, who will hand over the reins in 2023 to Kathy Ryan, Irish Life Investment Managers. Last year we welcomed two new CDP Ireland Steering Committee members; Mary Frances Rochford has replaced Shane Colgan as our EPA representative, and Collette Coogan replacing Stephen Nolan as our Sustainable Finance Ireland representative. Thanks again to all our committee members for their dedication and input.



Eoin Fahy
KBIGI



Kathy Ryan
Irish Life Investment
Managers



Emma Jane Joyce
NTMA



Cormac Madden
ESB



Bianca Wong
Kingspan Group Plc



John Barcroft
The Environmental
Edge



John O'Sullivan
SEAI



Outi Marin
Smurfit Kappa Plc



Mark Prendergast
CRH Plc



Neil Menzies
Hibernia REIT



Padraig Mallon
Kerry Group



Sarah Dempsey
AIB



Sinéad Hickey
John Sisk & Son



**Mary Frances
Rochford**
EPA



Shane O'Reilly
KPMG



Collette Coogan
International
Sustainable
Finance Centre
of Excellence

Executive Support



Brian O'Kennedy
Clearstream
Solutions



Gavin Whitaker
Clearstream
Solutions

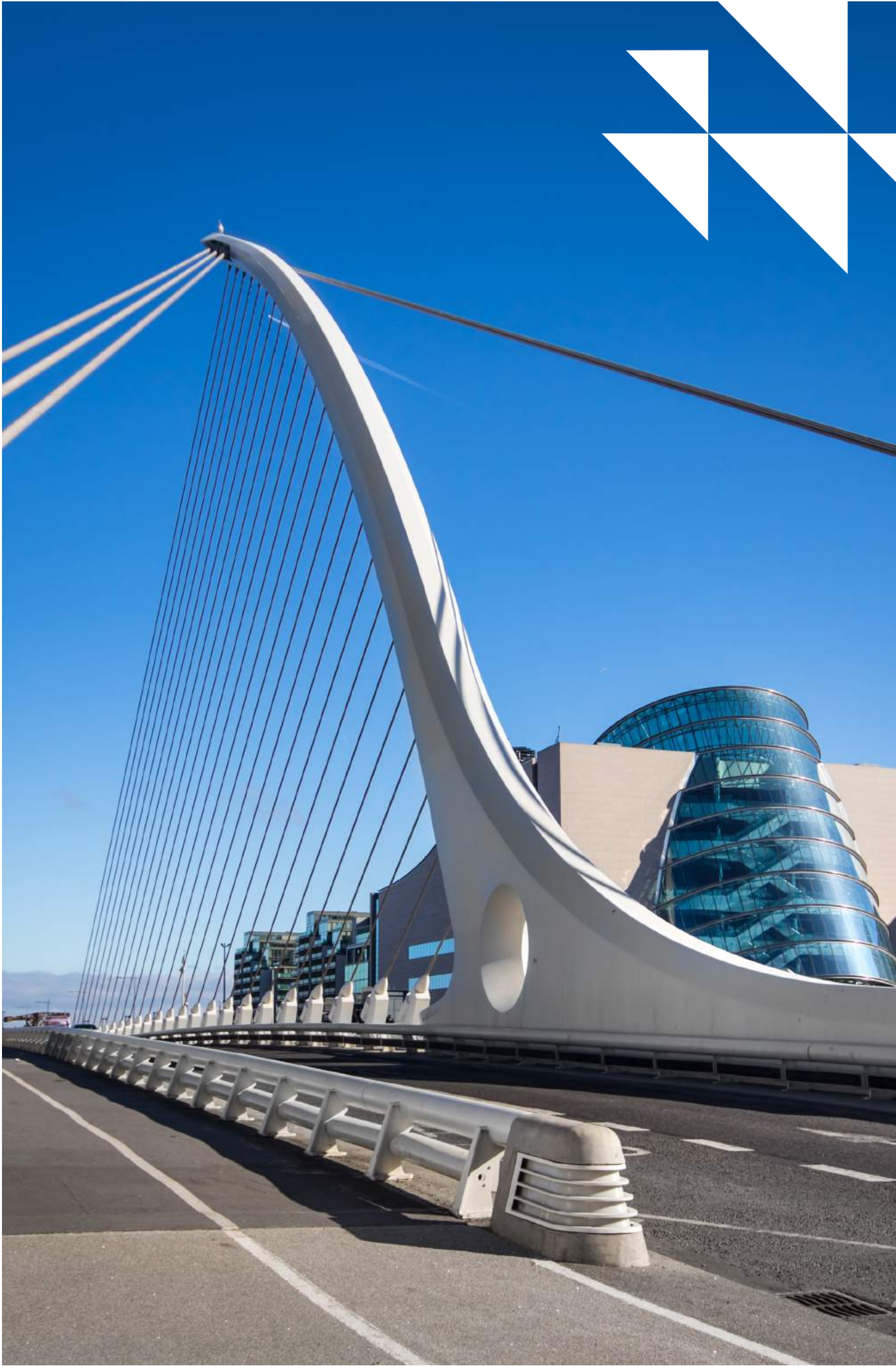
Disclosure Support

To assist with the increasing volume of activity in Ireland, we would like to thank Nicole Morejón, CDP Disclosure Support. Nicole, based in Berlin, and assists Irish companies in engaging with the CDP platform and will work with the CDP Ireland Network and Clearstream Solutions to accelerate the growth in the number of responding companies across all CDP programs.

Thank you, Nicole for all your support.



Nicole Morejón
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87 Irish companies who responded in 2022



68%

Ireland reporting companies scored a B- or higher compared to 60% globally



Response: 87



Response: 11



Response: 7

2022 responses from Irish companies

68%

Irish companies requested by CDP responded in 2022

384

Companies reporting to CDP with operations in Ireland

an increase of 25% on 2021

58%

Increase in Climate Change responses in 2022

85

CDP Supply Chain responders in Ireland in 2022

33

companies in Ireland have an approved Science Based Target

INVESTOR PERSPECTIVE



KATHY RYAN

Head of Responsible Investment

Climate change is set to cause systemic economy-wide impacts that harm human and economic structures with repercussions for financial markets.

IRISH LIFE INVESTMENT MANAGEMENT

The IPCC report 2022 warned that the world is set to reach the 1.5°C level within the next two decades and that only the most drastic cuts in carbon emissions from now would help prevent an environmental disaster. This year has seen a variety of extreme climate disasters, from flooding in Pakistan to wildfires across Europe and water shortages in northern Mexico. Climate change is set to cause systemic economy-wide impacts that harm human and economic structures with repercussions for financial markets.

Managing climate change risk will require companies to align capital, technology and strategy with future climate scenarios. In a recent report from CDP analyzing disclosure from 18,600+ companies across 135 countries, CDP found that companies are lagging in terms of climate action and regulation from the European Union, UK and US.

As a result, a key strategy for investors is to manage climate-related financial risks in their portfolios to ensure that the companies in which they invest are mitigating and effectively addressing climate change. Irish Life Investment Managers (ILIM) recognises the magnitude of the net zero objective and the challenge that this presents to the financial community, companies and societies at large. Given the size of ILIM's investment portfolio (€92.7 billion) and the range of asset classes and sectors in which ILIM invests, this represents ILIM's biggest share of emissions and where we can drive change to a lower carbon economy.

At ILIM, we intend to play our part by delivering better climate-aligned investment solutions across our assets under management (AUM). We will achieve this through our solution design, our stewardship of assets and, most importantly, through partnerships with our clients as they progress on their own sustainability journeys.

ILIM's Climate Strategy Advances

In 2022, ILIM released its second TCFD report, which provides an overview of our progress in the climate agenda over 2021. A key milestone was added to ILIM's climate strategy in 2022 by setting a climate target for ILIM's operational and financed emissions and formally signing up to the Net Zero Asset Managers initiative, a further milestone in our Climate Action Pledge and an additional commitment to targets and accountability on our part. We will continue to lead on this agenda – through our actions, through our advocacy at policy level and through industry initiatives.

Climate Target

ILIM will initially commit c.20% of total AUM to Net Zero, with a long-term target of 100%.

For these assets, ILIM will seek to achieve at least 25% reduction in weighted average carbon intensity by 2025, and at least 50% reduction by 2030, compared to base year 2019.

In making this commitment, ILIM adheres to the Paris Aligned Investor Initiative (PAII). The PAII is a collaborative investor-led global forum enabling investors to align their portfolios and activities to the goals of the Paris Agreement. The PAII framework is designed to provide a foundation based on climate science, on which a broad range of asset owners and asset managers can make commitments to achieving net zero emissions and define strategies, measure alignment, and transition their portfolios.

ILIM uses its voice as an investor to engage with and vote on companies it invests in to ensure investee companies are mitigating climate risks and embracing the opportunities of the transition to a low carbon economy. ILIM has developed bespoke Global Proxy Voting Guidelines to better align our voting strategy with the expectations of the Net Zero Stewardship initiative. Our guidelines take a proactive voting approach by targeting companies lagging on climate change mitigation.

ILIM continues to advocate for climate action

with policymakers, investors, and industry groups.

A core part of ILIM's responsible investment strategy is to request investee companies to disclose their environmental, social and governance risks. ILIM has also been engaging with investee companies, both directly and collaboratively, around environmental disclosures using the CDP framework for a number of years. In 2022, we expanded this direct engagement focusing on Irish companies. Going forward, we aim to expand our dialogues to ensure that, by 2025, 70% of our financed emissions in material sectors are aligned with a net zero pathway, or subject to direct or collaborative engagement.

In addition, ILIM incorporates environmental, social and governance (ESG) factors and climate metrics into its investment process across our proprietary equity and corporate bond strategies.

Additionally, ILIM's exclusions approach (applied to our proprietary equity and corporate bond strategies) is constructed to set a baseline of eligible investments and to incorporate climate specific screens, in addition to companies in violation of global standards and norms.

ILIM continues to advocate for climate action with policymakers, investors, and industry groups. We are members of the Principles for Responsible Investment (PRI), Institutional Investors Group on Climate Change (IIGCC), Net Zero Stewardship Working Group, Carbon Disclosure Project (CDP), Climate Action 100+ and the Global ESG Benchmark for Real Assets (GRESB).

Our Role as Asset Manager - Working with Clients

This all builds on the work that we have done with Asset Owners over the past several years, which has resulted in c. 49% of our current total AUM being invested in Article 8 strategies as at end-2022.

Our Climate Action Pledge, published in 2022, is to work in partnership with, and on behalf of, our clients by using our influence in terms of investment decision making, risk management and public advocacy to accelerate and play a positive role in the climate change agenda, both within our own market and globally.



SBTI UPDATES FOR IRELAND REPORT

Commitments & Targets Approved Data



World

4525 commitments
2241 targets approved



Europe

2416 commitments
1195 targets approved



Ireland

56 commitments
30 targets approved

Climate action in Ireland: Sharp increase in commitments and targets set

SBTi shows companies the amount and speed at which they need to reduce their emissions to meet the goals of the Paris Agreements. The number of companies taking action through the SBTi has increased considerably in recent years. Since the SBTi's launch in 2015, more than 4,500 companies have joined the initiative across the globe of which over 2,200 have had their targets approved by the SBTi to date.

2022 saw particularly rapid growth in the number of companies setting SBTs. Globally, more than 2,000 joined which represents a two-fold increase relative to 2021. In Ireland, 21 companies joined the SBTi in 2022, which is similar to the number of companies who joined the previous year (19). Among the heavy-emitter companies, it is worth highlighting CRH Plc who had their targets approved and Ryanair Holding Plc who joined the initiative last year.

When it comes to targets, 14 Irish companies set Paris-aligned near-term targets via the SBTi in 2022, a similar number to the previous year (11). 12 of these targets are 1.5°C aligned, including those set by CRH Plc and Smurfit Kappa Group Plc.

Towards a Net-Zero future

Recognising the need for credible long-term trajectories in addition to near-term SBTs, the SBTi published the first framework for corporate net-zero target setting in October 2021: the SBTi Net-Zero Standard. In a contested and often confusing net-zero landscape, this standard helps to provide clarity and catalyse meaningful climate action.

The Net-Zero Standard covers a company's entire value chain emissions and requires companies to set both near- and long-term targets. Longterm targets require emissions cuts of 90-96% before 2050, and only when this deep decarbonisation is achieved, and residual emissions have been neutralised can a company claim to have reached net-zero.

While more than 1,600 companies have made a public commitment to set a SBTi-approved Net-Zero target, there is still an urgent gap to close, especially across energy-intensive sectors. In Ireland only 11 companies have made a Net-Zero commitment via the SBTi to date. We urge other Irish companies to join this leading group and take rapid steps to decarbonise in line with a 1.5°C trajectory.



International climate and environmental policy developments: Significant agreement on nature, behind expectations on climate

Kunming-Montreal Global Biodiversity Framework: Addressing the nature crisis

At the close of the UN Biodiversity Conference – CBD COP15 – governments agreed [a new Global Biodiversity Framework](#), which commits them to deliver “urgent action to halt and reverse biodiversity loss” so as to “put nature on a pathway to recovery” by 2030. This was a momentous agreement, including global consensus from 196 countries to protect 30% of land and sea, cut environmentally harmful subsidies and increase finance flows for protecting and restoring nature.

CDP worked closely with partners and policy makers ahead of and during the CBD COP15 to demonstrate the need for transparency and accountability of companies in reversing biodiversity loss. This is reflected in target 15 of the Kunming-Montreal Global Biodiversity Framework (GBF), in which governments commit to “ensure that all large and transnational companies and financial institutions” monitor, assess and disclose their risks, dependencies and impacts on biodiversity, including in their operations, supply and value chains, and portfolios.

¹ Secretary-General's remarks at launch of report of High-Level Expert Group on Net-Zero Commitments, António Guterres, 08 November 2022

POLICY UPDATE EUROPE & IRELAND

By Mirjam Wolfrum, Director Policy Engagement, Europe

Further, companies and financial institutions should disclose further information to consumers to drive sustainable consumption and outline compliance, if applicable.

As of 2022, companies disclosing to CDP's climate change questionnaire, can disclose information on biodiversity. In response to the GBF, companies active in the fight against biodiversity loss have a unique opportunity to signal their support to governments for an enforceable framework for the assessment and disclosure on biodiversity impacts and dependencies.

UNFCCC COP27: The implementation COP

The 27th COP of the UNFCCC (COP27) taking place in Egypt in November 2022 marks a further move from the finalisation of the Paris Rulebook in Katowice and Glasgow the previous years, to taking action on implementing the commitments made by the countries in their Nationally Determined Contributions (NDC) and framed in their long-term strategies, as well as keeping their promise to accelerate ambition to limit global warming to 1.5°C. While the outcome fell behind the hopes for the commitment to action, in order to accelerate the transition to a net-zero future, the major political decision called the “Implementation Plan” includes progress on climate finance, especially for addressing loss & damage, keeping nature prominent and more accountability and representation of non-Party stakeholders.

In this perspective, the UN Secretary-General tasked the UNFCCC executive Secretary to elaborate a plan in 2023 to ensure transparency and accountability with non-Party stakeholders' commitments. This mission draws upon the report of the High-Level Expert Group on Net-Zero Commitments and will address the credibility crisis of transition plans with net-zero pledges from financial institutions and companies. As a core data partner of the Global Climate Action Portal ([GCAP](#)), CDP contributes continuously to a robust

accountability through the provision of transparency. The GCAP is a global and public platform managed by the UNFCCC that registers pledges and tracks annual reporting on implementation.

The Global Stocktake ([GST](#)) is the central mechanism to track progress towards the long-term goals of the Paris Agreement. The GST will be presented at COP28 in 2023 and Parties and other stakeholders have been initiating the preparation phase throughout 2022 with technical dialogues. Parties will engage in the GST every five years, assessing their collective progress towards targets and using the results to inform the next round of NDCs, identifying where the gaps are and increasing their level of ambition. [CDP is supporting efforts](#) to inform the GST with non-Party stakeholder data in a reliable and comparable manner.

Net-Zero Public Data Utility - At COP27, the Climate Data Steering Committee announced next steps for ground-breaking net-zero public data utility ([NZDPU](#)), which will bring transparency to efforts to transition to a net-zero economy by addressing data gaps, inconsistencies, and barriers to information that slow climate action. It will provide accurate, trusted and verifiable climate transition-related data, openly available in a single place for the first time. CDP will be working with the NZDPU Committee to provide the foundational data that will populate the NZDPU.

CDP Government Dashboard - CDP launched the [CDP Government Dashboard](#) at COP27, its first online interactive tool for policymakers. The dashboard is part of CDP's government partnerships program and enables policymakers to explore critical corporate and subnational environmental data, such as climate and nature targets set by companies, cities, and regions who disclose through CDP. The CDP Government Dashboard supports policymakers to develop, refine and implement evidence-based policy by providing insights into what action is currently undertaken and identifying gaps.

EU POLICY DEVELOPMENTS

Finalization of the EU's disclosure requirements and making headway on corporate governance

Over the course of 2022, the EU institutions made significant headway in finalising the EU climate and environmental disclosure requirements for companies and financial institutions in the EU and those placing products or services in the EU. Beyond disclosure requirements, the EU institutions have driven forward legislation which will require large companies to have transition plans that align their strategy and business model with limiting global warming to 1.5°C, and concluded legislation on addressing demand and supply-side deforestation of products placed on the EU market.

The **Corporate Sustainability Reporting Directive (CSRD)** was signed by the EU co-legislators in December 2022, and represents a significant step towards providing investors and other stakeholders with access to the information required to assess the investment risks linked to climate change and other sustainability issues. The new directive ensures large companies, as well as listed SMEs, are required to disclose sustainability information, as well as foreign companies with a significant economic footprint in Europe.

The double materiality reporting rules require companies to be more transparent about both the impact of the environment on the company, as well as the company's impact on the environment. Finally, reporting costs are expected to be reduced for companies over the medium to long term by harmonizing the information to be provided in a digitized way and with a mandatory audit of the information reported.

Companies subject to the CSRD will have to report according to **European Sustainability Reporting Standards (ESRS)**, with the EU Commission expected to adopt the first set of standards by mid-2023, based on the draft standards published by the European Financial Reporting Advisory Group (EFRAG)

- the technical group advising the EU executive on the ESRS - in November 2022. This first batch of ESRS will be sector agnostic, with industry specific standards expected to be adopted the following year.

The first companies – those already subject to the Non-Financial Reporting Directive – will have to apply the new rules for the first time in 2025 on fiscal year 2024.

The **Corporate Sustainability Due Diligence Directive (CSDDD)** is an important cornerstone of the EU regulatory framework on company law and corporate governance. The EU's proposed CSDDD will require all large companies with more than 500 employees (whether established in the EU and/or outside the EU) to adopt a plan to ensure that the business model and strategy of the company are compatible with the transition to a sustainable economy and with the limiting of global warming to 1.5°C in line with the Paris Agreement. While the requirements of this proposal are currently under negotiation in the EU institutions, it is currently expected that large companies established in the EU will be required to adopt transition plans by 2026 and 2028 for companies established outside of the EU.

The EU finalised its negotiations on the **Deforestation Regulation (EUDR)** in December 2022 and the political agreement is due to be formally adopted in early 2023. Companies, producing and consuming countries will have two years to prepare for the new rules, which address demand and supply-side deforestation meaning that certain products will be subject to strict due diligence checks before being eligible to be placed on the EU market.

The new regulation sets strong mandatory due diligence rules for companies that want to place relevant products on the EU market or export them. When the new rules enter into force, all relevant companies will have to conduct strict due diligence if they place on the EU market, or export from it: palm oil, cattle, soy, coffee, cocoa, timber and rubber as well as derived products (such as beef, furniture, or chocolate). Companies will have to prove that the products are both deforestation-free (produced on land that was not subject to deforestation after 31 December 2020) and legal (compliant with all relevant applicable laws in force in the country of production).

CDP is piloting EU Taxonomy questions in 2023 - Starting from 2023, CDP will focus on integrating best practice sustainable finance taxonomy criteria into its questionnaire and scoring, bringing them to life in the real economy. **CDP is piloting** questions on the EU Taxonomy within its 2023 Climate Change Questionnaire, focused on gathering data on the two environmental objectives that have been so far approved (climate change mitigation and adaptation). In practice, this means around 2.400 European companies will be disclosing information on their taxonomy alignment through CDP, bringing financial and sustainability reporting one step closer to being on an equal footing.

National climate and environmental policy: An ambitious start into the decade with need to strengthen implementation

Almost two years ago, the government introduced its climate and environmental goals with the Climate Action and Low Carbon Development Act 2021 (**Climate Action Plan 2021**)². The plan includes 2030 as well as 2050 targets:

- ▼ 51% emission reductions by 2030
- ▼ net-zero emissions by no later than 2050

However, despite the introduction of legally binding carbon budgets and sectoral emissions ceilings, the implementation of the climate goals needs to speed up, according to the Climate Change Performance Index (CCPI) 2023. Further, Irelands commitments to the EU are lacking behind, as the government has failed to yet submit their long-term strategy to the EU Commission. Thus, more action towards implementation of the climate targets is needed by the Irish government.

Policy implementation: Supporting governments on driving policy implementation and ambitious climate and environmental action

The transition to 1,5°C and nature positive world is underway and companies, cities and regions in the EU Member States, including in Ireland, need to set ambitious climate and nature targets and implement transition plans. Irish companies, cities and regions could thus be leading the transition in Europe and implementing the Irish government's target for climate resilience, net-zero GHG and biodiversity recovery.

As a CDP **government partner**, governments can actively drive the increase in quantity and quality of climate and environmental data of corporates and local governments. Through CDP government partnerships this enhancement of measuring and tracking of progress drives domestic action on preventing dangerous climate change, water insecurity, global deforestation and biodiversity loss. An endorsement of CDP disclosure system is a formal agreement of support by governmental bodies and agencies for CDP's charitable mission and CDP's disclosure request. It recognizes the pivotal role of the private market in achieving national and cross-national climate targets in line with the Paris Agreement. By endorsing CDP, governments effectively leverage their authority to promote environmental action among corporates and local governments. and product supply chains.

² [Climate Action and Low Carbon Development Act 2021](#)
³ [Climate Change Performance Index \(CCPI\) 2023](#)
⁴ [Ireland three years past deadline to send long-term climate strategy to European Union](#)
⁵ [Government of Ireland: Press release, Climate Action Plan 2021 - Securing Our Future](#)

The Netherlands, Government of Netherlands / Ministry of Economic Affairs and Climate Policy

Endorsement of the CDP disclosure platform for companies, cities, states & regions



“Private companies, cities, and regions play a key role in taking collective action on climate change, water security and the conservation of forests and realizing opportunities for a sustainable economy. That is why we support the work of CDP in helping more companies, cities and regions to disclose their impact on the Paris Agreement’s climate goals and the Sustainable Development Goals.”

Rob Jetten,
Minister for Climate and Energy Policy



For more government endorsements, see CDP website.

New Public Authorities program

In 2022, CDP launched a **new environmental disclosure model** tailored specifically for public authorities, including an annual questionnaire. The questionnaire was developed in partnership with 20 public authorities in North America, to ensure the program's adequacy and relevance. Disclosure helps public authorities manage environmental impacts and risks, uncover opportunities and benchmark against peers. Transparency of environmental and climate impacts and actions also enables public authorities to inform the wider public about their activities. As of 2022, 15 public authorities in North America disclosed to CDP, including the New York Power Authority, Central Arkansas Water and the Philadelphia International Airport. CDP is starting to work with European public authorities as of the beginning of 2023.



*To stay up to date with CDP Europe's policy and public affairs activities, subscribe to the **CDP policy newsletter**.*

CDP SCORING METHODOLOGY 2022

CDP Scoring Partner



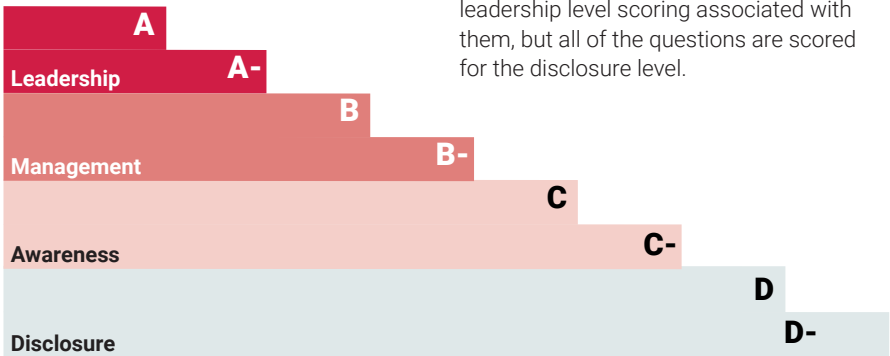
CDP scoring lays down milestones marking the progress of a company's sustainable journey. It provides a roadmap to companies to compare themselves to the best in class. The scoring methodology has evolved over time to influence company behaviour in order to improve their environmental performance. Scoring at CDP is mission-driven, focusing on principles and values for a sustainable economy, and highlighting the business case for change.

To operationalise this approach, in 2018 CDP developed an Activity Classification System (CDP-ACS), a three-tiered system starting from the lower rung of Activity, going up to Activity Group and, finally, Industry. This framework categorizes companies by the most relevant sectors. It focuses on the diverse activities from which companies derive revenue and associates these with the impacts on their business from climate change, water security and deforestation. This helps ensure a better understanding of company actions according to their environmental risk, opportunity and impact and is essential for better comparability of data.

To best cater to the different needs and aspects of the sectors with highest impact, in 2022 CDP offered **17 sector-specific questionnaires** in addition to a general questionnaire for all other industrial sectors.

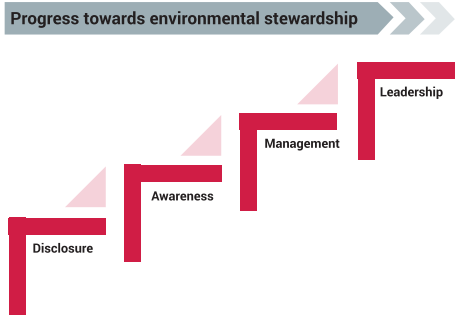
While the bulk of the scoring logic applies to all sectors and questionnaires alike, each of the sector-specific questionnaires comes with a somewhat tailored scoring methodology, and set of questions. The sector-based approach allows CDP to make more meaningful assessments of companies' responses, incorporating each sector's characteristics and nuances, resulting in a score that reflects the company's progress in environmental stewardship and enabling better

Scoring categories and weightings



F = Failure to provide sufficient information to CDP to be evaluated for this purpose.¹²

Illustration of scoring levels



benchmarking against other companies.

The scoring of CDP's questionnaires is conducted by an accredited scoring partner trained by CDP. CDP's internal scoring team coordinates and collates all scores and run thorough data quality checks and quality assurance processes to ensure that scoring standards are aligned between samples and scoring partners.

Responding companies are assessed across four consecutive levels which represent the steps a company moves through as it progresses towards environmental stewardship: Disclosure which measures the completeness of the company's response; Awareness which intends to measure the extent to which the company has assessed environmental issues, risks and impacts in relation to its business; Management which is a measure of the extent to which the company has implemented actions, policies and strategies to address environmental issues; and Leadership which looks for particular steps a company has taken which represent best practice in the field of environmental management.

Questions may include criteria for scoring across more than one level. The criteria for scoring the levels are distributed throughout the questionnaire and publicly available. Some of the questions might not have awareness, management or leadership level scoring associated with them, but all of the questions are scored for the disclosure level.

CDP breaks down its scoring into categories in order to better focus on key data points and provide a more detailed summary of a company's score. Scoring categories in 2022 are sub-groups of the 2022 questionnaire modules and are unique to each theme. Within each theme, the subgroups will remain consistent across all sectors. The mapping of each question and module to their respective category for each sector can be found here.

Each sector within each theme is affected by and manages environmental issues in a specific way. To capture these specificities, different weightings will be applied amongst sector scoring categories in each theme.

Weightings are applied by calculating the Management and Leadership score per scoring category in the same way as previous years: Numerator / Denominator * 100

These % scores are then translated into a category score per level by calculating the proportion of points achieved relative to the category weighting: Category weighting (%) / 100 * Management or Leadership score (%)

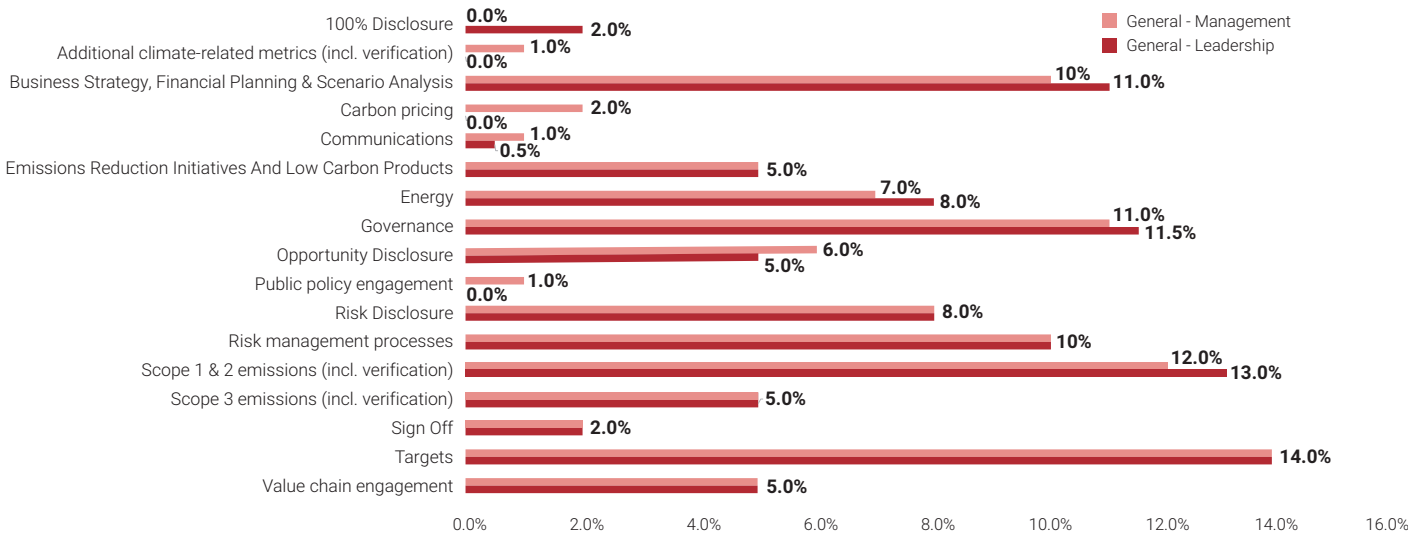
The category scores for each level are then summed together to calculate the overall final score.

Scoring weightings will only be applied to each of the scoring categories at Management and Leadership level. Where a scoring category consists of new questions, low weightings will reflect this to allow companies to familiarize reporting to them. Weightings will be applied differently across sector categories for each theme to reflect this, and the categories and weightings are publicly available here.

Public scores are available in CDP reports, through Bloomberg terminals, Google Finance and Deutsche Börse's website. CDP operates a strict conflict of interest policy with regards to scoring and this can be viewed at bit.ly/2Sx3hLd

GENERAL SCORING METHODOLOGY CATEGORY WEIGHTINGS

This 'summary sheet' outlines the 2022 Climate Change scoring categories and the weightings that will be applied to these categories for companies responding to CDP's 2022 General Climate Change questionnaire. If your company is responding to a different sector-specific questionnaire, please refer to the summary sheet for that sector.



¹ The table is an example of the General Scoring methodology category weightings. Sector-wise scoring and the respective categories and weightings can be found [here](#).

Scoring categories & weightings: an overview

Scoring categories are groupings of questions by topic. They are sub-groups of the 2022 questionnaire modules and are consistent across all sectors. Weightings are applied to scoring categories at the Management and Leadership levels only. Weightings reflect the relative importance of each category in an organization's progression towards environmental stewardship, within the boundaries of the CDP questionnaire and available scoring criteria. As such, the weighting applied to each category varies across sectors to highlight the areas most important to environmental stewardship in specific sectors.

2022 scoring categories

The 17 scoring categories in 2022 are: 100% Disclosure points, Governance, Risk management processes, Risk Disclosure, Opportunity Disclosure, Business Strategy, Financial Planning & Scenario Analysis, Targets, Emissions reduction initiatives and low-carbon products, Scope 1 & 2 emissions (incl. verification), Scope 3 emissions (incl. verification), Energy, Additional climate-related metrics (incl. verification), Carbon pricing, Value chain engagement, Public policy engagement, Communications, and Sign off. The category on Biodiversity was not scored.

Appendix I
Ireland responding companies

Company	2022 Response Status	2021 Response Status	2020 Response Status	2019 Response Status	2018 Response Status	2017 Response Status	2016 Response Status	2015 Response Status
ABP Food Group	AQ	NR	NR	NR	NR	NR	NR	NR
Abtran	AQ	NR	NR	NR	NR	NR	NR	NR
Accenture	AQ	NR	NR	NR	NR	NR	NR	NR
AerCap Holdings	AQ	NR	NR	NR	NR	NR	NR	NR
AIB Group Plc	AQ	NR	NR	NR	NR	NR	NR	NR
Allegion Plc	AQ	NR	NR	NR	NR	NR	NR	NR
An Post	AQ	NR	NR	NR	NR	NR	NR	NR
Applegreen Plc	AQ	NR	NR	NR	NR	NR	NR	NR
Ardagh Glass Packaging Holding Sarl	AQ	NR	NR	NR	NR	NR	NR	NR
Ardagh Metal Packaging S.A.	AQ	NR	NR	NR	NR	NR	NR	NR
Arthur Cox	AQ	NR	NR	NR	NR	NR	NR	NR
Aryzta AG	AQ	NR	NR	NR	NR	NR	NR	NR
ATA Group	AQ	NR	NR	NR	NR	NR	NR	NR
Bank of Ireland	AQ	NR	NR	NR	NR	NR	NR	NR
Bidvest Noonan	AQ	NR	NR	NR	NR	NR	NR	NR
BidX1 Technology Limited	AQ	NR	NR	NR	NR	NR	NR	NR
C&C Group Plc	AQ	NR	NR	NR	NR	NR	NR	NR
Cairn Homes Plc	AQ	NR	NR	NR	NR	NR	NR	NR
Cental Engineering Ltd	AQ	NR	NR	NR	NR	NR	NR	NR
Colorman	AQ	NR	NR	NR	NR	NR	NR	NR
Córas Iompair Éireann Group (CIE)	AQ	NR	NR	NR	NR	NR	NR	NR
CPL Resources Plc	AQ	NR	NR	NR	NR	NR	NR	NR
CRH Plc	AQ	NR	NR	NR	NR	NR	NR	NR
Dalata Hotel Group	AQ	NR	NR	NR	NR	NR	NR	NR
Dawn Meats Group Ltd	AQ	NR	NR	NR	NR	NR	NR	NR
DCC Plc	AQ	NR	NR	NR	NR	NR	NR	NR
Dexgreen Ltd	AQ	NR	NR	NR	NR	NR	NR	NR
Dole plc	AQ	NR	NR	NR	NR	NR	NR	NR
Dublin City University	AQ	NR	NR	NR	NR	NR	NR	NR
E +I Engineering Corporation	AQ	NR	NR	NR	NR	NR	NR	NR
Ecocem	AQ	NR	NR	NR	NR	NR	NR	NR
EirGrid plc	AQ	NR	NR	NR	NR	NR	NR	NR
Element Six	AQ	NR	NR	NR	NR	NR	NR	NR
Energia	AQ	NR	NR	NR	NR	NR	NR	NR
ESB Group	AQ	NR	NR	NR	NR	NR	NR	NR
Experian Group	AQ	NR	NR	NR	NR	NR	NR	NR
FBD Holdings Plc	AQ	NR	NR	NR	NR	NR	NR	NR
Flutter Entertainment Plc	AQ	NR	NR	NR	NR	NR	NR	NR
Fónua Ltd	AQ	NR	NR	NR	NR	NR	NR	NR
Gas Networks Ireland	AQ	NR	NR	NR	NR	NR	NR	NR
Glanbia Plc	AQ	NR	NR	NR	NR	NR	NR	NR
Glen Dimplex	AQ	NR	NR	NR	NR	NR	NR	NR
Glenveagh Properties Plc	AQ	NR	NR	NR	NR	NR	NR	NR
Globoforce	AQ	NR	NR	NR	NR	NR	NR	NR

NR : No Response
AQ : Answered Questionnaire
DP : Decline to Participate
QF : Questionnaire Forthcoming
^ : Information not requested
F : Failure to respond

Appendix I
Ireland responding companies

Company	2022 Response Status	2021 Response Status	2020 Response Status	2019 Response Status	2018 Response Status	2017 Response Status	2016 Response Status	2015 Response Status
Grafton Group Plc	AQ	NR	NR	NR	NR	NR	NR	NR
Greencoat Renewables Plc	AQ	NR	NR	NR	NR	NR	NR	NR
Greencore Group Plc	AQ	NR	NR	NR	NR	NR	NR	NR
Hibernia REIT Plc	AQ	NR	NR	NR	NR	NR	NR	NR
HK International	AQ	NR	NR	NR	NR	NR	NR	NR
Icon Plc	AQ	NR	NR	NR	NR	NR	NR	NR
Inizio	AQ	NR	NR	NR	NR	NR	NR	NR
Irish Continental Group plc	AQ	NR	NR	NR	NR	NR	NR	NR
Irish Water Company	AQ	NR	NR	NR	NR	NR	NR	NR
James Hardie Industries	AQ	NR	NR	NR	NR	NR	NR	NR
John Sisk & Son (Holdings) Ltd	AQ	NR	NR	NR	NR	NR	NR	NR
Johnson Controls International Plc	AQ	NR	NR	NR	NR	NR	NR	NR
Jones	AQ	NR	NR	NR	NR	NR	NR	NR
KBI Global Investors	AQ	NR	NR	NR	NR	NR	NR	NR
Keelings Group	AQ	NR	NR	NR	NR	NR	NR	NR
Kenmare Resources Plc	AQ	NR	NR	NR	NR	NR	NR	NR
Kerry Group Plc	AQ	NR	NR	NR	NR	NR	NR	NR
Kingspan Group Plc	AQ	NR	NR	NR	NR	NR	NR	NR
M50 Concession Ltd.	AQ	NR	NR	NR	NR	NR	NR	NR
Mainstream Renewable Power	AQ	NR	NR	NR	NR	NR	NR	NR
McKeon Construction Ltd	AQ	NR	NR	NR	NR	NR	NR	NR
Medtronic Plc	AQ	NR	NR	NR	NR	NR	NR	NR
Mercury	AQ	NR	NR	NR	NR	NR	NR	NR
Millington	AQ	NR	NR	NR	NR	NR	NR	NR
National Treasury Management Agency	AQ	NR	NR	NR	NR	NR	NR	NR
O'Brien Fine Foods	AQ	NR	NR	NR	NR	NR	NR	NR
Origin Enterprises Plc	AQ	NR	NR	NR	NR	NR	NR	NR
Ornua	AQ	NR	NR	NR	NR	NR	NR	NR
Permanent TSB Group Holdings Plc	AQ	NR	NR	NR	NR	NR	NR	NR
Perrigo Company Plc	AQ	NR	NR	NR	NR	NR	NR	NR
PM Group	AQ	NR	NR	NR	NR	NR	NR	NR
Richard Nolan Civil Eng Ltd	AQ	NR	NR	NR	NR	NR	NR	NR
Ryanair Holding Plc	AQ	NR	NR	NR	NR	NR	NR	NR
Seagate Technology LLC	AQ	NR	NR	NR	NR	NR	NR	NR
Sharp Services LLC	AQ	NR	NR	NR	NR	NR	NR	NR
Smurfit Kappa Group Plc	AQ	NR	NR	NR	NR	NR	NR	NR
Starcom Ireland Ltd	AQ	NR	NR	NR	NR	NR	NR	NR
TAM Ireland Services	AQ	NR	NR	NR	NR	NR	NR	NR
Trane Technologies	AQ	NR	NR	NR	NR	NR	NR	NR
Truata Ltd	AQ	NR	NR	NR	NR	NR	NR	NR
Tullow Oil	AQ	NR	NR	NR	NR	NR	NR	NR
Uniphar Plc	AQ	NR	NR	NR	NR	NR	NR	NR
Version 1 Software Ltd	AQ	NR	NR	NR	NR	NR	NR	NR
Watermark Coffee	AQ	NR	NR	NR	NR	NR	NR	NR
Winters Plant Hire Ltd	AQ	NR	NR	NR	NR	NR	NR	NR

Appendix II

Ireland non-responding companies

Company	2022 Response Status	2021 Response Status	2020 Response Status	2019 Response Status	2018 Response Status	2017 Response Status	2016 Response Status	2015 Response Status
Alkermes Plc	F	F	F	F	F	F	F	F
Cosmo Pharmaceuticals NV	F	F	^	^	^	^	^	^
DAA Plc	F	NR	NR	NR	NR	NR	NR	NR
Datalex Plc	F	F	F	F	F	F	F	NR
Donegal Investment Group Plc	F	F	F	F	F	F	F	NR
Eircom	F	F	F	F	F	F	F	F
Engage XR Holdings Plc	F	NR	NR	NR	NR	NR	NR	NR
Great Western Mining Corp Plc	F	F	^	^	^	^	^	^
Jazz Pharmaceuticals Plc	F	F	F	F	F	F	F	F
Malin Corp Plc	F	F	F	F	F	F	^	^
Mincon Group Plc	F	F	F	^	^	^	^	^
Open Orphan Plc	F	F	^	^	^	^	^	^
Ormonde Mining Plc	F	NR	NR	NR	NR	NR	NR	NR
Ovoca Bio Plc	F	F	^	^	^	^	^	^
Petroneft Resources Plc	F	F	F	F	F	F	^	^
Providence Resources Plc	F	F	F	F	F	F	F	NR
Yew Grove Reit Plc	F	F	^	^	^	^	^	^

NR : No Response
AQ : Answered Questionnaire
DP : Decline to Participate
QF : Questionnaire Forthcoming
^ : Information not requested
F : Failure to respond
F* : Intends to AQ 2020

Appendix III

Global responding companies with operations in Ireland

Company	Country	Sector
A.P. Moller - Maersk	Denmark	Transport services
Abbott Laboratories	USA	General
AbbVie Inc	USA	General
ABP Food Group	Ireland	Food, beverage & tobacco
Abtran	Ireland	General
Accenture	Ireland	General
Addtech AB	Sweden	General
Aecom	USA	General
AerCap Holdings NV	Ireland	General
Aggreko	UK & NI	General
AIB Group Plc	Ireland	Financial services
ALD SA	France	General
Allegion Plc	Ireland	Capital goods
ALPS ALPINE CO LTD.	Japan	General
Americold Logistics Inc	USA	General
Amgen, Inc.	USA	General
An Post	Ireland	General
Applegreen Plc	Ireland	General
Applied Materials Inc.	USA	Capital goods
Aptiv	UK & NI	Capital goods
Aramark Corporation	USA	General
Ardagh Glass Packaging Holding Sarl	Ireland	General
Ardagh Metal Packaging S.A.	Ireland	General
Arista Networks	USA	General
Arlo Technologies Inc.	USA	General
Arm Ltd.	UK & NI	General
Aryzta AG	Ireland	Food, beverage & tobacco
Asana, Inc.	USA	General
Asics Corporation	Japan	General
Assa Abloy	Sweden	Capital goods
Associated British Foods	UK & NI	Food, beverage & tobacco
Astellas Pharma Inc.	Japan	General
ATA Group	Ireland	General
Atos SE	France	General
ATS Automation Tooling Systems	Canada	Capital goods
Auto Trader Group	UK & NI	General
Autodesk, Inc.	USA	General
Automatic Data Processing, Inc.	USA	General
Avient	USA	Chemicals
Balfour Beatty	UK & NI	Construction
Ball Corporation	USA	General
Bank of Ireland	Ireland	Financial services
Baxter International Inc.	USA	General
BayWa AG	Germany	Agricultural commodities
Bechtle AG	Germany	General
Bidvest Noonan	Ireland	General
BidX1 Technology Limited	Ireland	General
Biogen Inc.	USA	General
Block, Inc.	USA	General
BorgWarner	USA	Transport OEMS - EPM
Boston Scientific Corporation	USA	General
Brambles	Australia	General
Brenntag SE	Germany	General

Appendix III

Global responding companies with operations in Ireland

Company	Country	Sector
Bristol-Myers Squibb	USA	General
Britvic	UK & NI	Food, beverage & tobacco
Broadcom Inc	USA	General
Broadridge Financial Solutions Inc	USA	General
Brookfield Renewable Partners L.P.	Bermuda	Electric utilities
Brown-Forman Corporation	USA	Food, beverage & tobacco
Bunzl plc	UK & NI	General
C.H. Robinson	USA	General
C&C GROUP PLC	Ireland	Food, beverage & tobacco
CAE Inc.	Canada	Capital goods
Cairn Homes Plc	Ireland	Construction
Capgemini SE	France	General
Capita Group	UK & NI	General
Cargill	USA	Agricultural commodities
CBRE Group, Inc.	USA	General
CCL Industries	Canada	General
Celestica Inc.	Canada	General
Cellnex Telecom SA	Spain	General
Cental Engineering Ltd	Ireland	Capital goods
Centrica	UK & NI	Electric utilities
Charles River Laboratories International Inc.	USA	General
CK Hutchison Group Telecom Holdings Limited	China, Hong Kong Special Administrative Region	General
Cloetta AB	Sweden	Food, beverage & tobacco
Coca-Cola HBC AG	Switzerland	Food, beverage & tobacco
Colorman	Ireland	General
Colt Technology Services	UK & NI	General
Compass	UK & NI	General
Concentrix	USA	General
Córas Iompair Éireann Group (CIÉ)	Ireland	Transport services
Coty Inc.	USA	General
Covanta Energy Corporation	USA	General
CPL Resources Plc	Ireland	General
CRH Plc	Ireland	Cement
Cummins Inc.	USA	General
Currys Plc	UK & NI	General
CVS Health	USA	General
Daiichi Sankyo Co., Ltd.	Japan	General
Daikin Industries, Ltd.	Japan	Capital goods
Dalata Hotel Group	Ireland	Real estate
Dana	USA	General
Danaher Corporation	USA	General
Daniel J Edelman Inc	USA	General
Danone	France	Food, beverage & tobacco
Dawn Meats Group Ltd	Ireland	Food, beverage & tobacco
DCC PLC	Ireland	General
Decathlon SA	France	General
Deere & Company	USA	Capital goods
Dentsu Group Inc.	Japan	General
Dentsu International	UK & NI	General
Deutsche Börse AG	Germany	General
Dexgreen Ltd	Ireland	General
DFDS A/S	Denmark	Transport services
DFS Furniture PLC	Uk	General
Diageo Plc	UK & NI	Food, beverage & tobacco
Digital Realty Trust Inc	USA	General
DLA Piper	UK & NI	General
Dole plc	Ireland	Agricultural commodities
Domino's Pizza Group plc	UK & NI	General
Dubai Aerospace Enterprise	United Arab Emirates	General
Dublin City University	Ireland	General
Dun & Bradstreet Corporation	USA	General
DWF Group	UK & NI	General
DXC Technology	USA	General

Appendix III

Global responding companies with operations in Ireland

Company	Country	Sector
E + I Engineering Corporation	Ireland	Capital goods
eBay Inc.	USA	General
Ecocem	Ireland	Cement
ECS	Belgium	Transport services
Edwards Lifesciences Corp	USA	General
EirGrid plc (RCT)	Ireland	Electric utilities
Elekta	Sweden	General
Element Six	Ireland	General
Elevance Health, Inc.	USA	General
Eli Lilly & Co.	USA	General
Emerson Electric Co.	USA	Capital goods
Energia	Ireland	Electric utilities
Energia Group	Ireland	Electric utilities
Entain	UK & NI	General
EPAM	UK & NI	General
EQUINIX, INC.	USA	General
Ericsson	Sweden	General
ESB Group	Ireland	Electric utilities
Etsy, Inc.	USA	General
euNetworks Group Limited	UK & NI	General
Expeditors International of Washington	USA	General
Experian Group	Ireland	General
Fastenal Company	USA	General
FBD Holdings Plc	Ireland	Financial services
Fiserv, Inc.	USA	General
Flutter Entertainment PLC	Ireland	General
Fónua Ltd	Ireland	General
FUJIFILM Holdings Corporation	Japan	General
G-Star RAW C.V.	Netherlands	General
Gap Inc.	USA	General
Gas Networks Ireland	Ireland	Oil & gas
General Electric Company	USA	Capital goods
General Mills Inc.	USA	Food, beverage & tobacco
Gilead Sciences, Inc.	USA	General
Glanbia PLC	Ireland	Food, beverage & tobacco
GLEN DIMPLEX	Ireland	General
Glenveagh Properties Plc	Ireland	Construction
Global Payments, Inc.	USA	General
Globoforce	Ireland	General
Grafton Group PLC	Ireland	General
Greencoat Renewables Plc	Ireland	General
Greencore Group PLC	Ireland	Food, beverage & tobacco
GRIFOLS	Spain	General
Grundfos Holding A/S	Denmark	Capital goods
GSK	UK & NI	General
Guerbet	France	General
Hanesbrands Inc.	USA	General
Hays	UK & NI	General
Heineken NV	Netherlands	Food, beverage & tobacco
Heraeus Precious Metals	Germany	Metals & mining

Appendix III

Global responding companies with operations in Ireland

Company	Country	Sector
Hermes International	France	General
Hertz Global Holdings	USA	General
HH Global	UK & NI	General
Hibernia Real Estate Group Limited	Ireland	Real estate
Hibernia REIT plc	Ireland	Real estate
Hill & Smith Holdings	UK & NI	General
Hilton Food Group plc	UK & NI	Agricultural commodities
HK International (International, Resupply)	Ireland	General
Hogan Lovells International LLP	UK & NI	General
Humanscale Corporation	USA	General
Icon PLC	Ireland	General
Illinois Tool Works Inc.	USA	General
Imperial Brands	UK & NI	Food, beverage & tobacco
Indorama Ventures PCL	Thailand	Chemicals
Ingka Holding B.V.	Sweden	General
Inizio	Ireland	General
Inizio Group Limited	UK & NI	General
Inspired PLC	UK & NI	General
Intel Corporation	USA	General
Intercontinental Exchange Inc	USA	General
International Consolidated Airlines Group, S.A.	Spain	Transport services
Inwido Ab	Sweden	General
Ipsen	France	General
Ipsos	France	General
IQVIA	USA	General
Irish Continental Group PLC	Ireland	Transport services
Irish Water Company	Ireland	General
Iron Mountain Inc.	USA	General
ISS	Denmark	General
Itron, Inc.	USA	Capital goods
J Sainsbury Plc	UK & NI	General
Jabil Inc.	USA	General
James Hardie Industries	Ireland	General
James Walker Group Ltd	UK & NI	General
JCDecaux SA.	France	General
John Sisk & Son (Holdings) Ltd	Ireland	Construction
Johnson & Johnson	USA	General
Johnson Controls International plc	Ireland	Capital goods
JPMorgan Chase & Co.	USA	Financial services
Just Eat Takeaway.com NV	Netherlands	General
Kainos Group	UK & NI	General
KBI Global Investors	Ireland	Financial services
Keelings Group	Ireland	Food, beverage & tobacco
Kellogg Company	USA	Food, beverage & tobacco
Kenmare Resources PLC	Ireland	Metals & mining
Kering	France	General
Kerry Group PLC	Ireland	Food, beverage & tobacco
Keurig Dr Pepper	USA	Food, beverage & tobacco
Kingspan Group PLC	Ireland	General
Kirchhoff Holding GmbH	Germany	General
KLA	USA	Capital goods
KN Network Dervices Ltd	UK & NI	General
Kohler Co.	USA	General
Kubota Corporation	Japan	Capital goods
La Poste	France	Transport services
Lam Research Corp.	USA	Capital goods
LeasePlan Corporation N.V	Netherlands	General
Lockton Companies LLP	UK & NI	General
Logitech Europe S.A.	Switzerland	General

Appendix III

Global responding companies with operations in Ireland

Company	Country	Sector
London Stock Exchange Group	UK & NI	General
Lululemon Athletica Inc.	Canada	General
Lumen Technologies	USA	General
LVMH	France	General
M50 Concession Ltd.	Ireland	General
Mace Ltd	UK & NI	Construction
Mainstream Renewable Power	Ireland	General
Marks and Spencer Group plc	UK & NI	General
Masonite	USA	General
Mastercard Incorporated	USA	General
McKeon Construction Ltd	Ireland	General
Medtronic Plc	Ireland	General
Merck & Co., Inc.	USA	General
Merck KGaA	Germany	General
Mercury	Ireland	Construction
Meta	USA	General
Micro Focus International	UK & NI	General
Microchip Technology	USA	General
Millington	Ireland	General
Mitsubishi Corporation	Japan	General
Molson Coors Brewing Company	USA	Food, beverage & tobacco
Moncler	Italy	General
Mowi ASA	Norway	Agricultural commodities
MSA Safety, Inc.	USA	General
N Brown Group Plc	UK & NI	General
National Treasury Management Agency	Ireland	Financial services
Netgear	USA	General
New Balance Athletics, Inc.	USA	General
News Corp	USA	General
Next	UK & NI	General
NIKE Inc.	USA	General
Nippon Express Holdings Inc	Japan	Transport services
Nipro Corporation	Japan	General
Nolato AB	Sweden	General
Nordzucker	Germany	Agricultural commodities
NortonLifeLock Inc	USA	General
Norwegian Air Shuttle ASA	Norway	Transport services
Novartis	Switzerland	General
O'Brien Fine Food	Ireland	Food, beverage & tobacco
OpenText Corporation	Canada	General
Orbia Advance Corporation	Mexico	Chemicals
Origin Enterprises PLC	Ireland	Food, beverage & tobacco
Ornua	Ireland	Food, beverage & tobacco
Ørsted	Denmark	Electric utilities
Pagegroup	UK & NI	General
Palladio Group SPA	Italy	Paper & forestry
Pandora A/S	Denmark	General
Paragon Customer Communications Ltd.	UK & NI	General
Paramount Global	USA	General
PayPal Holdings Inc	USA	General
PepsiCo, Inc.	USA	Food, beverage & tobacco
Permanent TSB Group Holdings Plc	Ireland	Financial services
Pernod Ricard	France	Food, beverage & tobacco
Perrigo Company Plc	Ireland	General
Pfizer Inc.	USA	General
Pinsent Masons LLP	UK & NI	General
Pitney Bowes Inc.	USA	General
PM Group	Ireland	General
Ponsse Oyj	Finland	Capital goods
Prada	Italy	General
Procter & Gamble Company	USA	General
Publicis Groupe SA	France	General

Appendix III

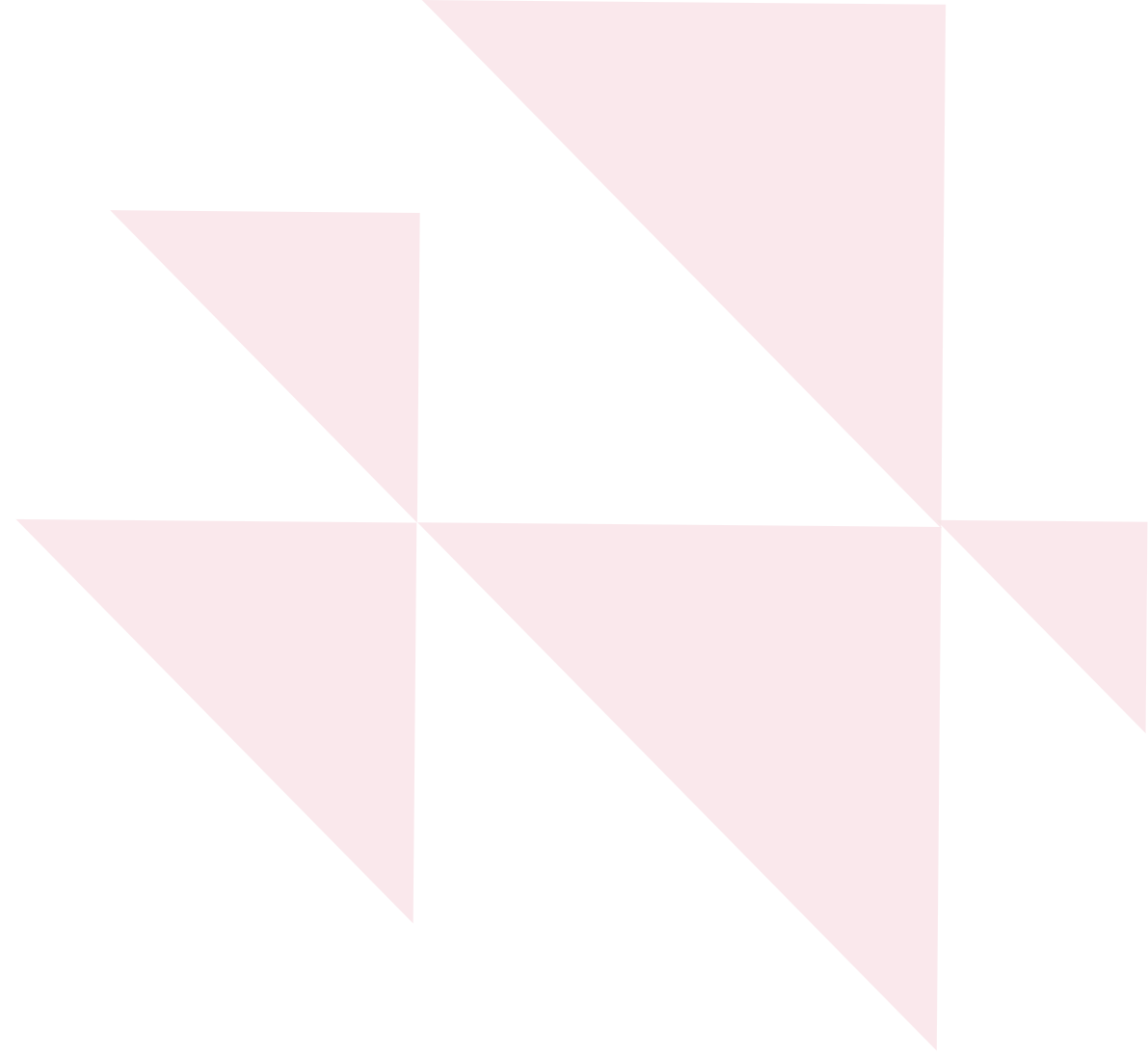
Global responding companies with operations in Ireland

Company	Country	Sector
Puig, S.L.	Spain	General
Puma SE PUMA SE	Germany	General
Puratos	Belgium	Food, beverage & tobacco
PVH Corp	USA	General
Quadient SA	France	General
Qualcomm Inc	USA	General
Ralph Lauren Corporation	USA	General
Recordati SpA	Italy	General
Redde Northgate Plc	UK & NI	General
Regatta Group (+ Craghoppers Ltd)	UK & NI	General
Regeneron Pharmaceuticals, Inc.	USA	General
Renishaw	UK & NI	General
Rentokil Initial	UK & NI	General
Richard Nolan Civil Eng Ltd	Ireland	Electric utilities
Robert Half International Inc.	USA	General
Robert Walters	UK & NI	General
Royal BAM Group nv	Netherlands	Construction
Royal BAM Group nv	Netherlands	Construction
RPM International, Inc.	USA	Chemicals
RPS Group Plc	UK & NI	General
Ryanair Holding PLC	Ireland	Transport services
Sacyr	Spain	Construction
Sage Group	UK & NI	General
Saint-Gobain	France	General
Salesforce.com, Inc.	USA	General
Samsonite International SA	China, Hong Kong Special Administrative Region	General
Sanmina Corporation	USA	General
Scandi Standard AB	Sweden	Food, beverage & tobacco
Schneider Electric	France	Capital goods
Securitas AB	Sweden	General
Segate Technology LLC	Ireland	General
Sharp Services LLC	Ireland	General
Sherwin-Williams Company	USA	Chemicals
Shopify Inc	Canada	General
SIG	UK & NI	General
Smart Metering Systems Plc	UK & NI	Electric utilities
SMCP SA	France	General
Smiths Group	UK & NI	Capital goods
Smurfit Kappa Group PLC	Ireland	Paper & forestry
SNC-Lavalin Group Inc.	Canada	General
SoftBank Group Corp	Japan	General
Sonoco Products Company	USA	General
Spirax-Sarco Engineering	UK & NI	General
SSE	UK & NI	Electric utilities
Starcom Ireland Ltd	Ireland	General
Stericycle Inc.	USA	General
Sthree Plc	UK & NI	General
Stryker Corporation	USA	General
Superdry	UK & NI	General
Syncreon	USA	General
Synopsys, Inc.	USA	General
TAM Ireland Services Ltd	Ireland	General
Tata Consultancy Services	India	General
Tech Mahindra	India	General
Telent	UK & NI	General
Telus Corporation	Canada	General
Temenos Headquarters SA	Switzerland	General
Tesco	UK & NI	General
Teva Pharmaceutical Industries Ltd	Israel	General
The Coca-Cola Company	USA	Food, beverage & tobacco

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Global responding companies with operations in Ireland

Company	Country	Sector
Thermo Fisher Scientific Inc.	USA	General
THK Co., Ltd.	Japan	Capital goods
Thrace Group	Greece	General
Tirlán	Ireland	Food, beverage & tobacco
TJX Companies, Inc.	USA	General
Trane Technologies	Ireland	General
Travel + Leisure Co.	USA	Real estate
Trimble Inc.	USA	Capital goods
Truata Limited	Ireland	General
TUI Group	UK & NI	General
Tullow Oil	Ireland	Oil & Gas
Unilever plc	UK & NI	General
Uniphar Plc	Ireland	General
United Health Group Inc	USA	General
Verisk Analytics Inc	USA	General
Vermilion Energy Inc.	Canada	Oil & gas
Version 1 Software Ltd	Ireland	General
Vertex Pharmaceuticals Inc	USA	General
Vestas Wind Systems A/S	Denmark	Capital goods
Viatis	USA	General
Visa	USA	General
VMware, Inc	USA	General
Vodafone Group	UK & NI	General
VPK Packaging Group NV	Belgium	Paper & forestry
W.W. Grainger, Inc.	USA	General
Watermark Coffee	Ireland	Food, beverage & tobacco
Waters Corporation	USA	General
Weener Plastics Group	Germany	General
West Pharmaceutical Services	USA	General
WestRock Company	USA	Paper & forestry
Winters Plant Hire Ltd	Ireland	Electric utilities
Wood Plc	UK & NI	General
Workday, Inc	USA	General
WPP Group	UK & NI	General
Xilinx Inc	USA	General
Zalando SE	Germany	General
ZAYO	USA	General
Zimmer Biomet Holdings, Inc.	USA	General



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