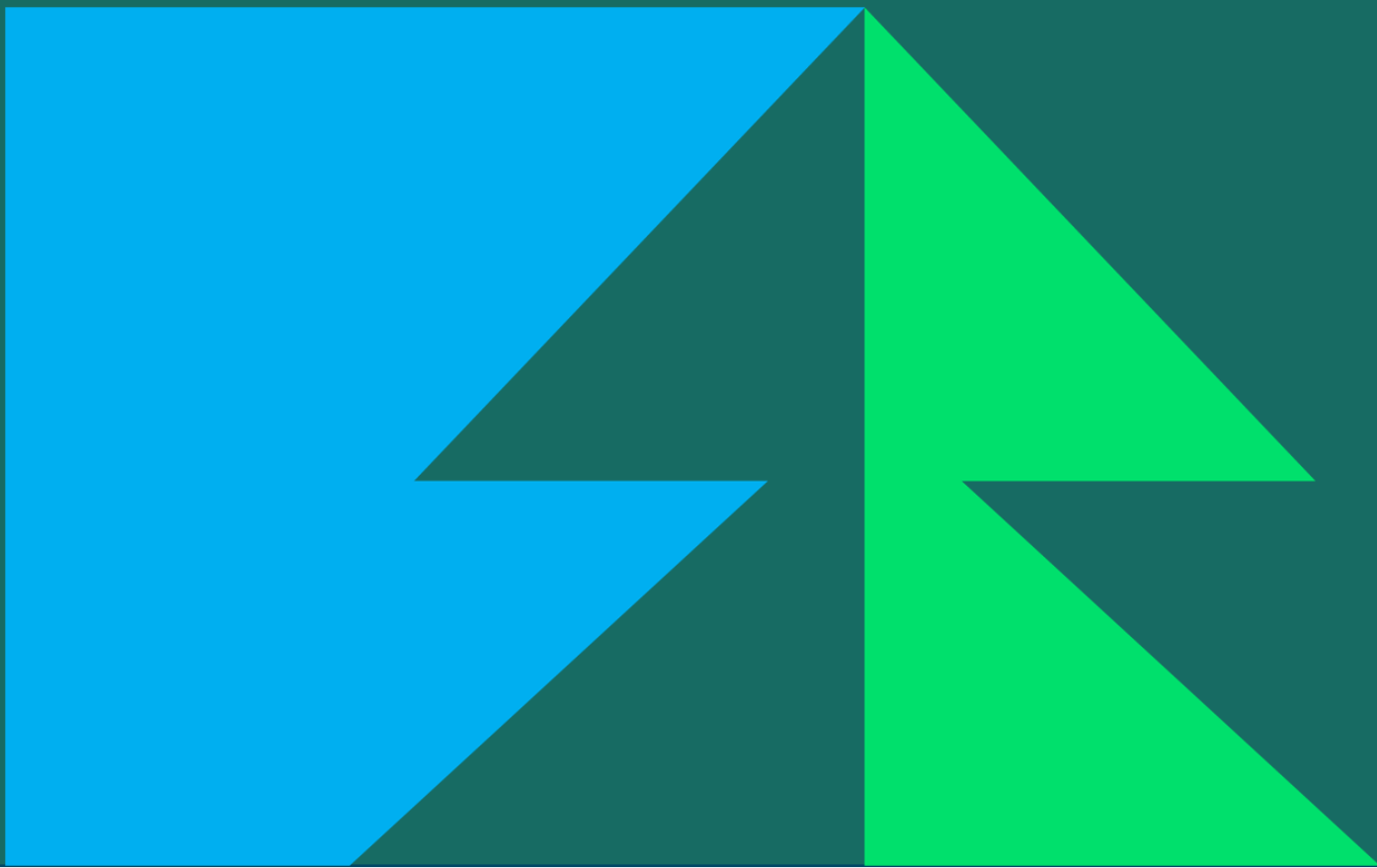




Company Assessment Framework

Guidance note
December 2024



COMPANY ASSESSMENT FRAMEWORK..... 2

OBJECTIVES AND DESIGN PRINCIPLES2

THE COMPANY ASSESSMENT FRAMEWORK3

PROGRESS REPORTS6

SUPPORTING COMPANY-SPECIFIC ENGAGEMENTS7

APPENDIX8

Company Assessment Framework

This document provides guidance to the Company Assessment Framework (CAF) that will be used to track company progress against Spring’s objectives. The assessment framework was developed by the PRI Executive with input from the Spring [Signatory Advisory Committee](#) (SAC) and [Technical Advisory Group](#) (TAG). The CAF provides a set of standardised indicators for the high-level company expectations in Spring’s [Investor Statement](#), and will be applied to track progress for all of Spring’s [focus companies](#). The CAF is a foundational piece of Spring’s overall impact assessment methodology and will be complemented by broader impact assessments (see ‘Progress reports’, p.6). Spring has made the CAF [publicly available](#) and may update its contents in the future to ensure that it remains fit for purpose.

Spring provides a platform to PRI signatories to take effective and efficient action to address the systemic risk posed by the worldwide deterioration of nature, and the CAF provides a tool to track progress of the initiative and steer its strategic direction. Prioritising common goals in their stewardship activities is a way for investors to safeguard common environmental assets on which their returns rely. Protecting these environmental assets also contributes to solutions that can bring down material climate change risks. Notwithstanding these common aims, each investor shall abide by their own antitrust compliance policies, and all applicable laws in their jurisdiction(s).

Objectives and design principles

Objectives

The CAF enables the PRI Executive, Spring participants and external stakeholders to assess and track corporate performance of all target companies against the initiative’s expectations. The findings of the assessment will inform the strategic direction of the initiative and help refine engagement strategies. Through the CAF, the PRI intends to provide a list of common indicators that allow comparability over time. The PRI executive recognizes that there are sectoral and geographical specificities, which will be addressed through individual engagement strategies (see ‘Supporting company-specific engagements’, p. 6).

Design principles

The following principles have guided the design of this assessment framework methodology:

- The CAF will be used to assess corporate performance against the **company expectations in Spring’s [Investor Statement](#)**
- The CAF includes **standardised indicators** that are applicable across all Spring focus companies, regardless of sector or geography

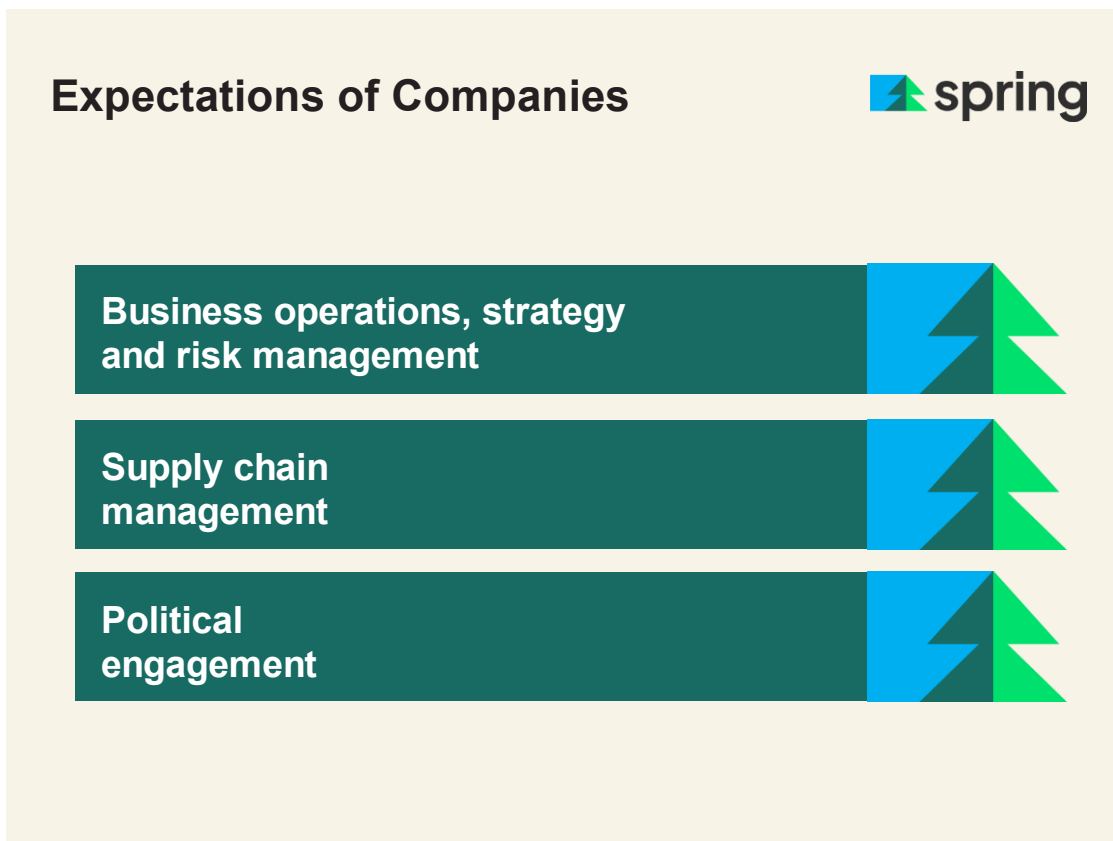
- The CAF avoids creating a new public benchmark, instead **leveraging existing and publicly available frameworks**
- The CAF includes **best-in-class indicators on [political engagement](#)** as a reflection of the importance of this topic in Spring’s engagement approach.

Why Spring is not developing its own public benchmark

Spring acknowledges that a substantial number of high-quality benchmarks and frameworks already assess action on nature, and deforestation in particular. Therefore, Spring has opted not to create its own public benchmark, but instead leverage the professional expertise underpinning existing frameworks to inform the CAF. This approach ensures that the initiative avoids duplication or confusion and allows participants and stakeholders to track progress in a robust and efficient manner. For the small number of companies that are also engaged through other nature-related investor initiatives, the CAF allows for engagement strategies that are additional and reinforcing of such efforts.

The Company Assessment Framework

Spring focus companies will be assessed against the three categories of expectations of the [Spring Investor Statement](#).



Spring will track the performance of focus companies through:

1. A bespoke set of indicators from the World Benchmarking Alliance (WBA)'s Nature Benchmark Methodology, as scored for **business operations, strategy and risk management**
2. A bespoke set of indicators from the World Benchmarking Alliance (WBA)'s Nature Benchmark Methodology, as scored for **supply chain management**
3. InfluenceMap's biodiversity assessment and a set of adapted indicators from the Global Standard on Responsible Climate Lobbying, assessing corporate **political engagement**.
 - o The adapted indicators from the Global Standard on Responsible Climate Lobbying (RCLS) will allow participants to track companies' **policies, governance and disclosure** of political engagement.
 - o InfluenceMap's biodiversity assessment will complement these indicators with scores assessing **implementation and practices** in corporate political engagement on biodiversity topics.

The PRI will not publish a common score across all indicators. Spring participants using the framework may refer to all indicators of the CAF in tracking company performance or may wish to focus on specific elements as dictated by the Company Engagement Group's priorities. For the full list of indicators, please see the Appendix (p.7) and the [CAF](#).

World Benchmarking Alliance Nature Benchmark

Spring will track corporate performance of its focus companies based on cross-sector indicators included in the World Benchmarking Alliance's [Nature Benchmark Methodology](#). The Nature Benchmark tracks and measures how companies are reducing their negative impacts on nature and contributing to the protection and restoration of ecosystems. The Nature Benchmark measured 816 companies across more than 20 industries between three initial research cycles between 2022 and 2024. Within these industries, companies operate at various points along the value chain and are scored accordingly.

We have selected the WBA Nature Benchmark on the grounds that it:

- provides **cross-sector coverage** of Spring's focus companies, with good alignment to the Spring company expectations¹
- provides **publicly available assessments** every two years
- is a framework **developed in consultation with stakeholders**, including investors

The Nature Benchmark Methodology consists of a set of indicators across key measurement areas. Each of the indicators is scored against a set of elements, with scoring guidelines defined for each indicator element. The CAF will include a selection of the indicators and underlying elements of the Nature Benchmark methodology. This selection is informed by the alignment of specific indicators with Spring's company expectations on Business Operations, Risk Management and Strategy, and

¹ The 816 companies covered by the Nature Benchmark cover all Spring focus companies except for five banks that are covered by WBA's Financial System Benchmark.

on Supply Chain Management (see the [CAF](#)). Where a relevant indicator was selected, we will assess companies against all elements of that indicator, with exceptions where specific elements are not relevant to the company expectations (see Appendix, p. 7).

WBA's Nature Benchmark methodology includes details on the scope of company actions and will track whether companies are taking action across their operations or value chain for every indicator. For the indicators linked to the Supply Chain Management expectations, the CAF will only assess scores that explicitly cover a company's value chain.

The Global Standard on Responsible Climate Lobbying (RCLS)

The [RCLS](#) is a framework developed to assist investors and other stakeholders in assessing whether and to what extent corporate political engagement is aligned with the goals of the Paris Agreement on Climate Change. The CAF includes RCLS indicators, adapted to apply to nature and biodiversity, to assess companies' policies, governance and disclosure of their political engagement activities. The Spring company expectations have been drafted to closely map the RCLS indicators and the CAF will provide aggregated assessments for each expectation, based on those indicators within the RCLS that focus specifically on policies, governance and disclosure.

We have selected the RCLS as it:

- is a standard driven by investors and **developed [in consultation with stakeholders](#)**, including the PRI, and which **builds on multiple existing standards**, initiatives and frameworks on political engagement²
- comprises indicators intended to be applied consistently across all regions and sectors³, ensuring **relevance across Spring focus companies**
- provides a **comprehensive assessment framework** covering various aspects of political engagement
- for companies with no or little disclosures, the standard can serve as a proxy for the company expectations and an **engagement guide for dialogue** with target companies.

As no public assessment of companies against the Standard is currently available, the PRI will seek to appoint a third party to conduct this assessment on a regular basis. In line with our design principles, we will aim for the assessments to be carried out by a provider who has the capacity to make these publicly available.

The InfluenceMap Biodiversity Assessment

[InfluenceMap's Biodiversity Assessment](#) provides detailed analyses of company policy engagement actions (direct and indirect via their industry associations) on biodiversity, as well as the quality and accuracy of company disclosures on their policy engagement activities. InfluenceMap's

² Including GRI, CDP, InfluenceMap, Transparency International and CERES.

³ <https://climate-lobbying.com/about/>

methodology for assessing corporate engagement on biodiversity loss closely follows their established [methodology](#) for assessing engagement on climate lobbying.

The Assessment's methodology relies on the [2013 Guide for Responsible Corporate Engagement in Climate Policy](#) issued by the secretariat of the UNFCCC and the United Nations Environment Programme (UNEP) under the Caring for Climate collaboration of the United Nations Global Compact. This document defines a list of corporate activities that constitute corporate climate engagement, ranging from advertising, social media, public relations, sponsoring research, direct contact with regulators and elected officials, funding of campaigns and political parties, and participation in policy advisory committees. InfluenceMap's Biodiversity Assessment applies this methodology to engagement on biodiversity, searching for all publicly available, reliable evidence on corporate engagement, including sources such as media reporting and public registers.

InfluenceMap's data on implementation and political engagement practices complements the assessment of corporate systems and governance provided by the RCLS indicators. Spring participants and other stakeholders may refer to the InfluenceMap scores to provide insight specifically on a focus company's political engagement practices.

InfluenceMap's biodiversity methodology assesses organisations on the basis of 11 biodiversity-specific queries⁴. Scored evidence is coded by InfluenceMap as '*strongly supporting*,' '*supporting*,' '*no position/mixed position*,' '*not supporting/supporting with exceptions*,' or '*opposing*' with reference to these queries.

We have selected InfluenceMap on the grounds that it:

- is a leading non-profit think tank on corporate political engagement and operates on a **proven methodology**
- has produced **foundational research** on climate lobbying
- is able to produce unmatched **depth of data**, going beyond disclosure to investigate companies' political engagement practice
- makes its findings **publicly available**.

InfluenceMap searches for new evidence on each assessed organisation on a weekly basis. When new evidence is found, it is added to the organisation's profile. Results of this analysis are made publicly available through the InfluenceMap website.

Progress reports

Spring will track the performance of the focus companies annually, following the release timelines of the WBA and InfluenceMap. The PRI Executive will not conduct assessments itself but rely on credible third-party assessments. The performance assessments of focus companies will be

⁴ See [The Corporate Sector and Biodiversity Policy](#), p. 10, Table 1

incorporated in an annual Spring progress report, recognising that potential improvements are likely to be the result of multiple factors, including outside the control of the initiative.⁵

Progress reports will also include data on engagement progress, provided by each of Spring's Company Engagement Groups, as well as individual case studies to provide examples of concrete improvements against the objectives of Spring. Progress data might include data on intensity of the engagement as well as real-world outcomes.

Broader impact assessments will complement the CAF. These could include:

- Tracking deforestation rates in target geographies
- Public policy changes
- Changes in positioning by relevant trade associations
- Monitoring allegations / controversies and company responses.

The framework will be periodically reviewed and may change over time as company engagements progress; the landscape of available frameworks and assessments evolves; and in case of revision of the external methodologies involved. This is to ensure that the framework remains fit for purpose and continues to draw upon the best available data.

The PRI will also name any company that will have been unresponsive to investor engagement in the annual progress report. Lead investors will be asked to notify focus companies of their inclusion in the annual report to provide an additional chance to participate in dialogue with investors before publication.

Supporting company-specific engagements

The CAF draws from external benchmarks that focus on the broad topic of nature, thereby ensuring the longevity of its usefulness in case Spring's thematic focus broadens in future phases. The PRI Executive recognizes the existence of additional high-quality resources on deforestation that can provide Spring participants with more in-depth and actionable information about corporate performance on this topic. Furthermore, we also recognize the existence of sector-specific frameworks that provide more tailored guidance for a subset of Spring focus companies.

Each of Spring's Company Engagement Groups⁶ develops a tailored engagement strategy. Such strategies are informed by the CAF, while allowing the flexibility that participants may also opt to identify specific objectives that are most relevant for a particular company. To support this process, the PRI will curate a toolkit of specific, best-in-class frameworks and principles, with relevant guidelines to support their use. This toolkit will be developed with stakeholder inputs. Spring participants may refer to this toolkit when defining key objectives for company engagements. These might include industry standards, data platforms and best-practice principles applicable to a subset

⁵ Where timelines of external releases do not match with the release plans of Spring's progress reports, the PRI Executive may seek to appoint a third party to conduct assessments.

⁶ A company engagement group is established for each focus company. Each engagement group generally consists of four to six members, made up of a lead or two co-lead investors plus collaborating investors.

of Spring focus companies from relevant sectors. The additional guidance and resources will also support participants in setting engagement objectives specific to financial institutions. The Spring team will evaluate the addition to the CAF of indicators specific to this sector if required.

In addition, the PRI will facilitate information exchanges between participating investors and external stakeholders to further inform relevant and tailored engagement approaches that reflect the local realities in which investee companies operate.

Appendix

The following table presents the full list of indicators, matching the Spring company expectations, drawn from the [WBA Nature Benchmark Methodology](#), adapted from the [Global Standards for Responsible Climate Lobbying](#) (RCLS) and scores from [InfluenceMap’s Biodiversity Assessment](#).

The WBA indicators allow the tracking of performance against expectations regarding Business Operations, Strategy and Risk Management and Supply Chain Management. A bespoke set of indicators was selected to match the Spring company expectations. Where a WBA Nature Benchmark indicator was selected, we have aimed to use the entire indicator in all its elements⁷. Where specific elements within an indicator best align to multiple company expectations, these have been split across the relevant expectations. Where an element is relevant for both Business Operations, Strategy and Risk Management and to Supply Chain Management, it is matched to the relevant expectations across both, and separate scores will be provided. For full detail of the indicators and elements used, see the [CAF](#).

The RCLS indicators match the company expectations on Responsible Political Engagement and are complemented by the scores provided by the InfluenceMap biodiversity assessment. The RCLS indicators have been adapted to refer to nature and biodiversity by:

- Replacing mentions of climate with mentions of nature (e.g. replacing ‘climate lobbying’ with ‘lobbying on nature’)
- Replacing reference to ‘the goal of restricting global temperature rise to 1.5°C above pre-industrial levels’ with ‘the goal of halting and reversing biodiversity loss by 2030’.

Enablers for halting and reversing biodiversity loss	...demonstrated by meeting expectations...	...that are signposted by indicators:
		WBA Indicators
Business operations, strategy and risk management	Publicly commit to take action to halt and reverse biodiversity loss by 2030, in line with the Global Biodiversity Framework.	WBA B05. Transition towards a nature-positive economy WBA B04. Halting biodiversity loss

⁷ An exception was made for Biodiversity Indicator 5 (B05), of which only indicator B05-b⁷ matched the expectations.

	Establish Board oversight of assessing and managing nature-related dependencies, impacts, risks and opportunities.	WBA A03. Accountability for sustainability performance
	Regularly monitor, assess, disclose and mitigate nature-related dependencies, impacts, risks and opportunities along operations and value chain. Seek alignment with internationally agreed disclosure frameworks such as the Taskforce on Nature-related Financial Disclosure (TNFD).	WBA B01. Impacts on nature WBA B02. Nature-related dependencies, risks and opportunities WBA B04. Halting biodiversity loss
	Set ambitious time-bound and science-based targets, with interim milestones, towards eliminating deforestation and biodiversity loss across operations and value chain.	WBA B03. Ecosystem protection and restoration WBA B04. Halting biodiversity loss
	Adopt sustainable practices for land-based operations to reduce land degradation while increasing biodiversity and soil health, in line with the UN's Land Degradation Neutrality Principles.	WBA B03. Ecosystem protection and restoration
Supply chain management	Set goals towards no-deforestation, no-conversion of natural ecosystems and respect for human rights as part of responsible sourcing policies, across geographies and direct and indirect suppliers. Apply internationally agreed definitions and cut-off dates for such goals.	WBA B03. Ecosystem protection and restoration WBA C01. Right to a sustainable environment WBA C02. IPLC and land rights WBA C03. Stakeholder engagement
	Establish due diligence company systems to implement these goals.	WBA B01. Impacts on nature WBA B03. Ecosystem protection and restoration WBA C01. Right to a sustainable environment
	Map, assess and monitor risks throughout the full supply chain of forest-risk commodities, ensuring an appropriate scope of responsible sourcing policies and managing for compliance.	WBA B02. Nature-related dependencies, risks and opportunities WBA CSI08. Grievance mechanisms for external individuals and communities

	Consider suitable escalation strategies in case of non-compliance.	WBA B02. Nature-related dependencies, risks and opportunities WBA B03. Ecosystem protection and restoration
	Publicly report progress towards company goals, disclose (non-) compliance of supply chain partners with responsible sourcing policies, and ensure accuracy in claims about company performance.	WBA B03. Ecosystem protection and restoration WBA B04. Halting biodiversity loss WBA C03. Stakeholder engagement
		RCLS Indicators
Responsible political engagement	Publicly commit to align direct and indirect political engagement activities with the missions of the Global Biodiversity Framework and Paris Agreement.	RCLS 1, 2, 3
	Establish and disclose robust governance processes and board oversight to ensure alignment of all direct and indirect political engagement, in all geographic regions, with those missions.	RCLS 4, 5, 6, 8
	Disclose affiliations to trade associations, think tanks and similar bodies across geographies. Identify, assess, and monitor the policy positions and activities of such bodies. Where there is misalignment with the aforementioned missions, consider corrective action, with suitable escalation strategies.	RCLS 9, 12, 13
<p>InfluenceMap indicators The RCLS indicators on Responsible political engagement assess an organisation’s policies, governance and disclosure of their political engagement activities. The InfluenceMap scores complement this data with an assessment of the organisation’s lobbying practices, adding a further level of insight.</p>		

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