



ECPI ESG RATING METHODOLOGY

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1. EXECUTIVE SUMMARY

This document sets out the analytical process behind ECPI's ESG (Environmental, Social and Governance) Rating Methodology.

The ESG methodology combines an academic and scientific approach to appraise and monitor a company's long-term strategic position, operational management and actual behavior when it comes to society, the environment and markets.

To investors, assessing businesses on these grounds is vital. How well a firm addresses corporate sustainability – from its treatment of staff, suppliers or shareholders to its environmental impact or governance standards – are considered as indicators of the quality of the process and management of a firm.

By evaluating a company's robustness, then, in terms of environmental and social performance, corporate governance structure and the coherence of its business mission, ECPI's ESG Rating Methodology provides investors with a powerful tool to detect non-traditional risk factors and to scout in the markets for hidden values and opportunities.

2. ECPI ESG RATING METHODOLOGY

SUSTAINABILITY FRAMEWORK

ECPI believes that sustainability and ESG aspects are a proxy of the quality of the management team and structure of a company. As demonstrated by a growing amount of academic research (see Appendix I) ESG aspects are a source of risks, costs, but also growth and brand opportunities. Such aspects are not usually factored-in by traditional equity analysis based on quantitative financial indicators.

ECPI analysis based on nontraditional, quantitative and qualitative non-financial indicators has the goal to develop a synthetic measure of the non-financial risk-opportunity profile of a company: the ECPI ESG Rating. This synthetic indicator is meant to be coupled with financial analysis to allow investment decision makers to make better informed decisions.

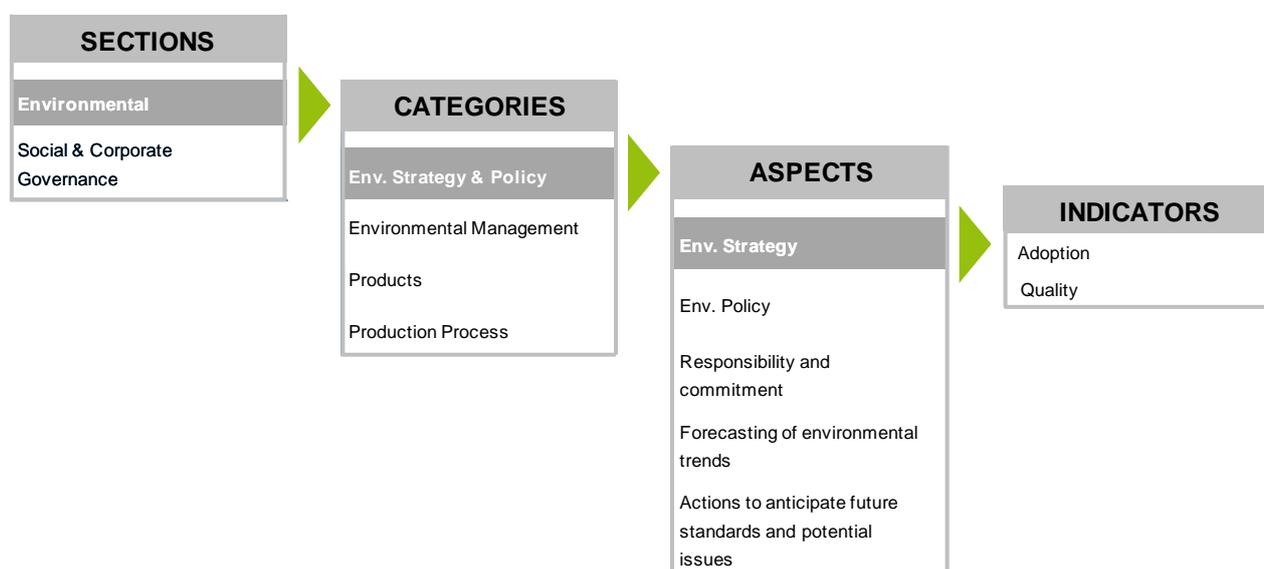
ESG CATEGORIES

ECPI's methodology uses several levels of analysis to assess a company's performance, each one providing a different degree of detail (see Figure 1).

ECPI's ESG framework is structured in:

- 2 Sections: Environmental and Social & Governance
- 8 Categories
- 38 Aspects
- 100+ Indicators

Figure 1: Example of the methodology structure



Source: ECPI

Taken together, the ESG Rating Methodology evaluates firms in the following areas:

“E”
Environmental strategy, policy and management system. Industry-specific environmental impact of production processes and products.

“S”

Social strategy and policy: assessing the quality of the company's relationships with its stakeholders (customers, competitors, employees, management, public agencies and regulators, shareholders, creditors, local government and international institutions), market positioning and competitor analysis.

“G”

Governance structure: assessing both market and internal management issues, identifying the structure of the company's governing bodies, its main operating characteristics, as well as the political and regulatory/legal specifics of the firm's country of affiliation.

The rating criteria have been developed in accordance with ICCR's "Principles for Global Corporate Responsibility: Benchmarks for Measuring Business Performance" and is inspired by the principles developed by International Bodies dedicated to Responsible Investment such as UN Global Compact (www.unglobalcompact.org), the Global Reporting Initiative (www.globalreporting.org) and UN PRI (www.unpri.org).

These guidelines draw from a wide range of studies by academic and scientific institutions, as well as related research from financial services companies.

Assessments are based on the review of a broad range of publicly-available sources including sustainability reports, annual reports and company websites. In certain circumstances, a company's Investor Relations department may also provide information.¹

¹ ICCR -- Interfaith Center on Corporate Responsibility -- is an association of faith-based institutional investors, including national denominations, religious communities, pension funds, endowments, hospital corporations, economic development funds and publishing companies. The ICCR and its members encourage companies to be socially and environmentally responsible.

3. ECPI ANALYSIS: CATEGORIES AND ASPECTS

3.1 ENVIRONMENTAL EVALUATION

A firm's Environmental Evaluation covers four categories, each one addressing a number of different aspects:

1. Environmental Strategy and Policy
2. Environmental Management System
3. Products (industry specific)
4. Production Process (industry specific)

ENVIRONMENTAL STRATEGY AND POLICY

- Definition of a strategy
- Presence and diffusion -- both within the company and to the public -- of a formal environmental policy to implement the strategy
- Nature of the environmental programs to apply the policy in terms of operational structure and sphere of application
- Definition of hierarchical levels of responsibility for policy enforcement
- Presence of qualitative and quantitative targets
- Capacity to forecast and meet emerging environmental trends and regulatory standards

ENVIRONMENTAL MANAGEMENT SYSTEM

- Adoption of and compliance with an international standard (EMAS, ISO14001, BS7750 or others)
- Scope of company's activities regulated by the management system
- Compliance with national and international regulation in the present and near past
- Frequency of system's revisions and audits/inspections
- Independence of the auditor and transparency on disclosure of non-compliance issues in the present and near past
- Availability, transparency and quality of information for employees (training) courses and the public at large
- Adoption of international reporting standards and responsiveness to external requests
- Supply chain management (e.g. environmental requirements for suppliers)
- Risk management and disaster recovery plans

PRODUCTS AND PRODUCTION PROCESS (SECTOR SPECIFIC)

These categories assess sector-specific factors. Industries are grouped as Distribution, Financial, Industrial, Pharmaceutical and Chemical, Resources, Transportation, Utilities and Other Services.

The evaluation monitors the impact level and recent trend of pollutant emissions, water treatment and use, waste treatment, land and energy use.

PRODUCTS

- Life-cycle impact analysis (materials, components, chemicals and substances, by-products, packaging and transport)
- Logistics issues
- Product research and development based on environmental impact and the launch of innovative products
- Education, training and information to consumers or customers (e.g. information on products and their correct use)
- Recycling of parts, by-products and materials

PRODUCTION PROCESS

- Emissions trend
- Waste treatment, recycling and disposal trends
- Energy efficiency with attention to the use of alternative and renewable energy sources
- Reduction of dependency on natural resources as part of the product design process
- Management of environmental risks
- Environmental criteria in selection of suppliers

Figure 2: Synthetic table on Environmental Categories

ENVIRONMENTAL EVALUATION	
A - Environmental Strategy	
Aspects	A1 - Environmental Strategy
	A2 - Environmental Policy
	A3 - Environmental Policy range and involvement
	A4 - Environmental management bodies and commitment
	A5 - Environmental targets
	A6 - Forecasting of environmental trends and future standards
	A7 - Actions to anticipate future environmental standards and potential issues
B - Environmental Management	
Aspects	B1 - Environmental Management System
	B2 - Legislation compliance
	B3 - Environmental inspections / audits
	B4 - Environmental transparency, information and openness
	B5 - Supply Chain Environmental Management
	B6 - Communication, training and education
	B7 - Risk Management
C - Products	
Aspects	C1 - Lifecycle environmental impact
D - Production Process	
Aspects	D1 - Environmental impact of the process and Eco-efficiency
	D2 - Environmental Liabilities
	D3 - Renewable sources of energy

3.2 SOCIAL AND GOVERNANCE EVALUATION

A firm's Social and Governance Evaluation covers four categories, each one addressing a number of different aspects:

5. Community Relations
6. Employees
7. Markets
8. Corporate Governance

COMMUNITY RELATIONS

- Formal commitment to respect human rights
- Compliance with national and international regulation regarding human rights in the present and near past
- Adoption, nature and scope of the citizenship policy
- Stakeholder engagement initiatives (e.g. promotion of social and cultural activities)
- Contribution to local development
- Sponsorships and events and the level and scope of involvement
- Transparency and communication (e.g. sustainability report)

EMPLOYEES

- Formal commitment to respect labour rights
- Compliance with national and international regulation regarding labour rights – concerning forced labour, discrimination, child labour, freedom of association -- in the present and near past
- Presence of a diversity policy with respect to minorities, disabilities, gender
- Presence and scope of employees' benefit policy
- Presence and scope of training programs
- Presence of a Health and Safety management system and the level of diffusion of the system
- Compliance with national and international regulation regarding health and safety management in the present and near past.

MARKETS

- Presence and scope of a supply chain management policy
- Compliance with national and international regulation with respect to procurement and distribution management in the present
- Transparency on products and services; customer relationship management policy
- Compliance with national and international regulation regarding customer management in the present
- Presence and scope of whistle-blowing policy, code of ethics and other related procedures
- Presence of an audit committee
- Compliance with national and international anti-corruption regulation in the present and near past
- Compliance with national and international antitrust regulation in the present and near past

CORPORATE GOVERNANCE

- Presence and scope of governance guidelines such as a code of conduct or insider dealing code
- Transparency and diffusion of the annual report
- Presence of an Investor Relations department
- Level of communication with the investment community (e.g. asset managers and investment banks)
- Compliance with national and international transparency regulation in the present and near past
- Level and scope of rights and duties of the shareholders
- Board structure (balance of power and control bodies), functioning and independence
- Code of conduct for the board of directors
- Policy for dealing with conflict of interests
- Transparency and scope of operations with related parties
- Compliance with national and international accounting regulations in the present and near past

Social and governance standards must be adhered to in all subsidiaries, affiliated, controlled or associated companies with particular attention paid to units operating in countries where the respect of human rights is reported to be weak.

Figure 3. Synthetic table on Social and Governance Categories

SOCIAL & GOVERNANCE EVALUATION	
E - Community Relations	
Aspects	E1 - Respect of human rights E2 - Corporate Citizenship strategy E3 - Social dialogue and community related initiatives E4 - Contributions to social and economic development E5 - Philanthropy, charity and donations strategy, initiatives and spending E6 - Social Accountability
F - Employees (Human Capital)	
Aspects	F1 - Employees rights respect F2 - Diversity/Gender F3 - Benefits F4 - Training, education and skills improvement F5 - Health and Safety
G – Markets	
Aspects	G1 - Relations with suppliers G2 - Relations with customers G3 - Corruption G4 - Competitors
H - Corporate Governance	
Aspects	H1 - Corporate Governance Guidelines H2 - Disclosure on Corporate Governance H3 - Rights and duties of shareholders H4 - Board structure and functioning H5 - Transparency of operations with related companies

4. ECPI INDICATORS AND EVALUATION CHECKLIST

A company must be assessed against all the ESG categories and aspects in order to achieve the final ESG score and rating.

Each aspect is itself made up of a set of qualitative and quantitative environmental, social and governance indicators. (To reflect differences between the environmental impacts of products and the production process across industries, sector-specific indicators are included among aspects of the Product and Production Process analysis.)

These indicators, based on state-of-the-art academic, scientific and financial research, cover all the non-financial areas of interest of a company.

Each one has a multiple-choice answer with a pre-defined set of scores that can be positive or negative depending on the aspect under scrutiny.

At this stage, the analyst will provide his or her own comment to explain their judgment and set out the reference material to support it.

The analysis is designed to be forward looking: evaluation of controversial practices, for instance -- where a trial is perhaps ongoing and/or a sentence or settlement is reached -- considers not only the potential impact on a company's profitability, but also the timeframe (whether the fact refers to a recent or old event), iteration (whether the issue is persistent and for how long), company reaction, event type (malice, guilt or fate) and the complicity of other companies.

The aim is to understand whether and to what extent the company is involved and its reaction: different situations will get different scores within a consistent methodology to assess all companies on the same basis.

A company's overall rating is the sum of the scores from each indicator; the higher the final score, the higher the final rating.

Below is an extract of the indicators used to assess a company's ESG performance.

A - ENVIRONMENTAL STRATEGY INDICATORS AND CHECKLIST (EXCERPT)

<i>Screening aspect</i>	<i>Explanation of the screening aspect</i>		<i>Checklist with scores (Max and Min)</i>
ASPECT	TOPIC	CHECKLIST	
A1 - Environmental Strategy	Formalized environmental strategy	Formalized environmental strategy	<input type="checkbox"/>
A2 - Environmental Policy	Adoption of a coherent environmental policy	Has the company developed an environmental policy coherent with its environmental strategy?	<input type="checkbox"/>
A3 - Environmental Policy range and involvement	How wide are the environmental policy and the level of internal / external commitment to develop it?	Does the environmental policy, if adopted, apply only to the company's operations, or to the environmental impact of products and services and/or suppliers and service providers or other business partners, too?	<input type="checkbox"/>
A4 - Environmental management bodies and commitment	Formal definition of roles and responsibilities by the company	Did the company formally address a responsible function for environmental issues?	<input type="checkbox"/>
A5 - Environmental targets	Formal commitment to environmental qualitative and/or quantitative targets and objectives	Did the company set formal environmental targets and objectives periodically reviewed by the Board of Directors or by the Senior Management?	<input type="checkbox"/>
A6 - Forecasting of environmental trends and future standards	Future trends in the company's environmental strategy	Is the company proactive in considering future environmental trends (e.g. adopting a different mix of energy sources, developing innovative resource-saving measures, etc.)?	<input type="checkbox"/>
A7 - Actions to anticipate future environmental standards and potential issues	Initiatives to address future environmental standards and potential issues	Is the company currently taking action to develop initiatives to address future environmental standards and potential issues?	<input type="checkbox"/>

5. EVALUATION

The result of the screening process, the company evaluation provides its overall ESG Rating, with all eight categories of analysis -- four on the environmental side and as many addressing society and governance -- contributing to the final score.

By incorporating sector-specific analysis, evaluations provide meaningful sector comparisons and rankings.

		Score		Microsoft Corp	Intel Corp	Cisco Systems	Vodafone
		Max	Min				
Environmental Evaluation	Environmental Strategy	15	0	13	15	13	15
	Environmental Management	15	0	7	11	10	10
	Products	15	0	15	7	7	11
	Production Process	15	0	4	4	4	6
Total Environment		60	0	39	37	34	42
Social & Governance Evaluation	Community Relations	15	0	15	15	15	15
	Employees (Human Capital)	15	0	2,5	3,5	2,5	4
	Markets	15	0	6	9	11	11
	Corporate Governance	15	0	7,5	5,5	5,5	5,5
Total Social and Governance		60	0	31	33	34	35,5
Grand Total (Environmental + Social and Governance)		120	0	70	70	68	77,5

DISCLAIMER: This example is for illustrative purposes only and does not represent the results of ECPI's ESG assessment.

6. INFORMATION SOURCES

Company analyses draw on a range of reliable and publicly-available sources to create a transferable, equitable and auditable approach. Where possible, ECPI aims to use objective information that is easily measured and quantified and less subject to bias and opinion. In cases where an indicator is important to capture, but not easily quantifiable, ECPI process works to reduce bias, by identifying clear and unambiguous rules for assigning scores.

The quality of the ESG research and rating process is certified since 2006 according to international ISO quality standards and verified on an annual basis by a third party, independent international auditor.

SOURCES INCLUDE:

- Company annual reports
- Company sustainability reports, environmental reports, CSR reports or similar
- Company websites
- Regulatory data (from the regulators in the country/countries where the company is incorporated and/or listed)
- Information providers and search engines
- Media and news services (including newsletters from local and international institutions and NGOs).
- Screening of company's participation in international institutions
- Screening of company's certifications
- Screening of company's awards
- Bloomberg and Thomson Reuters
- Thematic websites promoted by international non-profit organizations
- Company Investor Relations departments, when necessary. In such cases, we try to obtain written answers in order to be able to store them in the company's records.
- National (Bocconi University) and international university networks.

All documents used for each company appraisal are stored in a company-specific folder on ECPI's server.

ASSOCIATIONS AND NGOS

ECPI has built relationships with a range of non-profit and/or non-governmental organizations (NGOs) that collect information on company activities and on issues such as human rights, environmental pollution, respect for workers and minority groups.

ECPI favors NGOs associated or otherwise linked to organizations with an established legitimacy such as the United Nations, UNICEF, Amnesty International, Human Rights Watch or Freedom House. Nonetheless, information is usually double-checked against other sources – potentially including the company under evaluation -- in order to assess its reliability.

7. APP. I – ACADEMIC STUDIES ON THE RELATIONSHIP ESG - FINANCIAL PERF

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