JOHANNESBURG STOCK EXCHANGE
(JSE)
Communication to Stakeholders

BUSINESS STRATEGY

1. How does your exchange define and view the rationale for corporate sustainability and the exchange's role in promoting it?

Overview

The Johannesburg Stock Exchange ("JSE") offers secure, efficient primary and secondary capital markets across a diverse range of securities, supported by our post-trade and regulatory services. We are the market of choice for local and international investors looking to gain exposure to the leading capital markets in South Africa and the broader African continent.

The JSE is currently ranked the 19th largest stock exchange in the world by market capitalisation and the largest exchange in the African continent, and has for five years sustained the first position as the world’s best regulated securities exchange in the World Economic Forum Global Competitiveness Report.

The JSE was formed in 1887 during the first South African gold rush. Following the first legislation covering financial markets in 1947, the JSE joined the World Federation of Exchanges in 1963 and upgraded to an electronic trading system in the early 1990s. The bourse demutualised and listed on its own exchange in 2005.

The imperative to build a long term business model that takes cognisance of the impacts, risks and opportunities in relation to the environmental, social and economic contexts within which an organisation operates, is increasingly becoming part of the licence to operate for companies the world over. At its core a governance issue, sustainability requires particular focus given the planetary boundaries and the need to understand the impacts of any entity on society and the environment.

Investors also progressively recognise that they can no longer ignore these elements when performing fundamental analysis, and evidence is mounting that companies who integrate broader sustainability considerations into their value proposition, clearly position themselves for better performance in the longer term.

The JSE's approach to sustainability is informed by the different dimensions within which it is relevant to the JSE, namely:

- how we run our business and address internal corporate sustainability concerns to ensure sustainable value creation for our shareholders and broader stakeholders; in comparison with
- our external circle of control and ability to influence the broader debate with regard to the entities connected to us (issuers, investors and the intermediaries that facilitate interaction between them).
These two dimensions are intertwined in various aspects, for example in the way that our efforts to achieve internal efficiencies not only support our own business prospects but also inform the impact of the outward influence that we exert through these efforts and otherwise.

**The JSE Ltd journey – Towards a company that is built to last**

The JSE’s organisational strategy (see [http://www.jsereporting.co.za/ar2014/overview/strategic-journey.asp](http://www.jsereporting.co.za/ar2014/overview/strategic-journey.asp)) acknowledges the need to build a resilient organisation which is positioned for the future, and has been working internally to integrate sustainability considerations into its business operations and services. These considerations as well as the corporate scorecard are informed by the identification of key risks and material issues – see [http://www.jsereporting.co.za/ar2014/overview/our-material-issues.asp](http://www.jsereporting.co.za/ar2014/overview/our-material-issues.asp).

At a high level, the aim is to position the JSE to deliver sustainable value over the long term, through employing our competencies in a sustainable manner to achieve sustainable commercial growth and contribute to a sustainable community – all within the context of sound governance and a sustainable environmental footprint.
To embed a sustainability context into the way that we run our business, four main areas of focus on sustainability have been identified, namely:

- Operations and Technology
- People
- Products and Services
- Stakeholder relationships

Within these four focus areas, a number of themes are discussed in more detail on our web site at [https://www.jse.co.za/about/sustainability/jse-limited-journey](https://www.jse.co.za/about/sustainability/jse-limited-journey).

In addition, to ensure ongoing management of relevant issues, a number of themes are identified within each of the focus areas annually, which are managed and reported on annually in the JSE’s Integrated Annual Report.

![Sustainability Themes and Focus Areas for 2014](image)

*Figure 3 – Sustainability themes and focus areas for 2014*


**Regulator, Influencer, advocate - Contributing to sustainable business practices in the marketplace**

As a platform for businesses to raise capital and provide an avenue for the creation of tradable products, the exchange has recognised that a purely reactive response to sustainability may render its own viability in jeopardy without businesses to list. Therefore, as a service provider to both investors and issuers, the JSE has for long leveraged its central role in the economy beyond simply expressing a view on why sustainability is important, driving adherence through multiple streams.

Exchanges are critical cogs in the capital markets systems that are conduits for the capital flows that fuel economic growth. As a pivotal player, many of the JSE’s activities to date have been focused outward at creating an enabling environment influencing corporate and investor behaviour in a positive manner, through a hybrid approach that touches various aspects.
An overview of the key elements of our approach provided below – more detail can be found on our web site at [https://www.jse.co.za/about/sustainability/regulator-influencer-advocate](https://www.jse.co.za/about/sustainability/regulator-influencer-advocate)

- **High regulatory standards**
  - The JSE Listing Requirements has a long history of being at the forefront of promoting strong governance and disclosure by companies listing on the JSE. Beyond having very specific governance requirements that companies must comply with (such as the separation of CEO and Chairman), companies have to report on the extent to which they comply with the principles of the King Code on Corporate Governance (“King”) on an apply or explain basis.
  - In South Africa, King has been urging companies to commit to the principles of the triple bottom line since King II in 2002. From 2010, King III promoted the concept that strategy, governance and sustainability are inextricably intertwined, and recommended that companies integrate their approach to and reporting on risks and opportunities across financial and sustainability considerations. The incorporation of King into the Listing Requirements made the JSE the first exchange globally to mandate companies to move towards integrated reporting or explain why they are not doing so.

- **Products such as the SRI Index**
  - In May 2004, the JSE launched its flagship sustainability product, the Socially Responsible Investment (SRI) Index, aimed at influencing company behaviour, recognising that sustainable business can be optimised by corporates and investors through management of external factors and the integration of these into business strategy.
It was a pioneering initiative as the first such index to be owned by an exchange and the first of its kind in emerging markets. Ultimately the Index aims to encourage and recognise companies incorporating sustainability risk management into their business strategies, and to facilitate responsible investment.


- Thought leadership, advocacy and engagement
  - The JSE is a signatory to the United Nations-backed Principles for Responsible Investment and a founding partner of the Sustainable Stock Exchanges Initiative.
  - The JSE is also active in serving on a number of panels and committees related to responsible investment, sustainability and integrated reporting, including the following:
    - World Federation of Exchanges Sustainability Working Group (currently Vice-Chair)
    - King Committee on Corporate Governance
    - Code for Responsible Investment in South Africa (CRISA) Committee
    - Integrated Reporting Committee of South Africa
    - Various UN Consultative Groups

2. How does your exchange’s senior leadership and organizational structure support the promotion of corporate sustainability in its market(s)?

In keeping with the JSE’s integrated approach, the Sustainability team is situated within the broader Capital Markets Division which encapsulates focus areas on Primary Markets (across all of the JSE’s asset classes including equities, commodities, interest rate products, derivatives and structured products), Key Client management, Innovation, Business Intelligence and Strategy. This positions the sustainability function at the coal face of the JSE’s interaction with key clients and a range of further stakeholders, optimising the team’s ability to interact and engage with a range of players across the investment value chain.

The Sustainability team advises the CEO on the JSE’s strategic positioning as regards sustainability and also collaborates with the corporate areas of sustainability management as integrated throughout the JSE, either in relation to external positioning or to provide strategic and operational input – for example to –

- Governance, Compliance and Risk Division in relation to transformation, environmental management
- Corporate Affairs Division in relation to CSI, media relations, marketing, events and investor relations (including providing input to the Integrated Annual Report)
- Issuer Regulation Division as regards integrated reporting and corporate governance

Responsibility for oversight and implementation of our sustainability strategy and objectives rests with the Board and Executive leadership of the JSE.
The CEO is personally involved in many of the sustainability considerations and drives the strategic realisation of the JSE’s sustainability ideals while also participating in various discussion fora regarding sustainability.

As noted in our most recent Integrated Annual Report (see our web site at http://www.jsereporting.co.za/ar2014/reports/governance.asp), the Board of Directors of the JSE regards corporate governance as fundamentally important to the achievement of the JSE’s mission, its financial objectives and the fulfilment of its corporate responsibilities. The Board is committed to applying the Third King Code on Corporate Governance (King III) core governance principles, which prescribe accountability, integrity, fairness and transparency in all of the JSE’s business dealings with its stakeholders. The Board continues to perform its fiduciary duties, to act in good faith, with due diligence and care, and in the best interests of the JSE and all its stakeholders, in terms of the King III principles, the 2008 Companies Act of South Africa and other codes of good practice. Through these practices, the directors are able to contribute to the future sustainability of the company; enhance long-term shareholder value creation and ensure that other key stakeholders, such as clients, employees, regulators and suppliers, benefit from ongoing success.

As required by its listing requirements, the JSE publishes a full narrative regarding the extent of its compliance with King III. This can be found at http://www.jsereporting.co.za/ar2014/king.asp, and clearly demonstrates how the exchange regards the various sustainability principles encapsulated within King III.

In addition, the JSE’s Human Resources, Social and Ethics Committee (“HRSE”) (which reports directly to the Board), annually issues a statutory report detailing how the JSE fared in relation to the prescribed social and ethical issues (including in line with the UNGC principles and a range of other principles as prescribed by relevant legislation). The current HRSE report can be found at http://www.jsereporting.co.za/ar2014/social.asp.

3. What goals/objectives does your exchange have in regards to advancing sustainability in your market?

The influencing objectives of the JSE are to –

- crystallise the debate around sustainability with particular focus on the South African context;
- provide incentives for companies to integrate sustainability into their policies, practices and reporting;
- promote and facilitate responsible investment practices; and to
- provide thought leadership through participation in advocacy groups.

At the heart of the drive has been the exchange’s strive to promote corporate social responsibility and good corporate governance, to ensure viability of its companies and that of its own business, recognising the interconnectedness of the exchange and the companies that list on it.

Leveraging its reach and influence, the exchange has promoted the mainstreaming of sustainability through conversations with the regulator (the Financial Services Board (FSB)), the National Treasury and through the various other fora mentioned above.
Given the dynamic nature of sustainability, we will continue to reassess our approaches and to keep pace with trends in the industry. Our goals are focused on remaining an active participant in the debate around sustainable and responsible business practices, both globally and in South Africa and to continue to work with issuers, investors, regulators and other key stakeholders to promote ESG disclosure. In 2015, we will do this through the following avenues:

- Maintaining the strong regulatory framework that its listed companies are subject to, while monitoring and enforcing compliance as necessary.
- Maintaining continuous engagement and strong relationships with relevant regulators.
- Evolving the SRI Index in line with its strategy to implement an expanded ESG offering. This work is transitioning to a new model expected to be announced in May / June 2015 which will see a new evolution for companies and investors, in terms of which focus will be on the reporting and collection of investment grade data and increased flexibility in terms of creating innovative products and services for investors.
- Hosting workshops with issuers regarding changes to disclosure indicators and data collection processes.
- Engaging the investor community regarding the above processes and related service offerings.
- Facilitating the issuer-investor interface through events such as topical seminars and the annual ESG Investor Briefing to showcase SRI Index constituents.

In addition to the externally focused efforts outlined above, the JSE will continue to implement and manage elements of its internal sustainability strategy to consider the impacts, risks and opportunities of its own activities, and produce an integrated annual report and other disclosures to reflect on progress. We acknowledge that there are a number of areas where we still need to do some work to ensure that our impacts, potential challenges and opportunities are properly understood, and to enhance disclosure in this respect.

In conclusion, the JSE believes that it will need to maintain a dynamic approach to sustainability that balances proactive thought leadership with responsive engagement.

**TRANSPARENCY AND ISSUER REPORTING**

4. Describe your exchange’s approach to promoting sustainability disclosure by companies.

As elucidated above, the JSE’s follows a hybrid approach to influencing our stakeholders. From a regulatory perspective, companies are required to produce sustainability and/or reports on a comply or explain basis in line with the principles of King III.

Beyond regulation, the SRI Index has been the main instrument to encourage and assess ESG disclosure practices in an evolutionary fashion. In 2013, a greater emphasis on transparency saw the SRI Index research approach shift from a combined process of assessing public and privately submitted information, to only looking at publically available information. In 2015 the disclosure assessment process continues to evolve with the exchange taking a more deliberate step to enhance disclosure against a broader range of sustainability factors including performance metrics and to create more standardised investment-grade information. An announcement regarding the detail of this approach is expected during May / June 2015.
In addition, company briefing sessions as well as individual meetings take place throughout the course of the year to ensure that the indicators that are measured are understood. Companies receive feedback on their assessments, which serve as useful guidance for improving their practices against the benchmark indicators.

5. **What is your exchange’s process for reviewing listing standards in general? Are there opportunities for stakeholders to comment during this process?**

The exchange follows an open and inclusive approach to the review of its listing rules and incorporation of any amendments happen against the backdrop of consultations with market participants, the regulator etc.

The Issuer Regulations team is tasked with reviewing and overseeing implementation of new rules and ensuring that due process is followed. Proposed amendments are reviewed and then put forward to an advisory committee. Following this process there is a 30 day open period in which public comment is sought, with the amendments made available on the JSE website. On completion of the process the executive reviews the changes for approval. In the final stages of incorporation of the amendments the exchange regulator (the FSB) again invites public comment before finally passing the amended rules on to the registrar for publication in the State Gazette.

6. **How do you track sustainability reporting of your listed companies?**

From a regulatory perspective, the Issuer Regulation function that focuses on continuing obligations and reporting, will check that the governance requirements are in place, taking action where compliance is lacking (through an incremental process of sanction), and will also ensure that the company has issued the King III narrative that is required, and that explanations are provided for areas that have not been applied.

Beyond regulation, reporting on key sustainability indicators is currently mainly assessed through the SRI Index, process. Index participation and the success rates of inclusion or improvement in scores serve as good trackers of levels of reporting over the years. The statistics below demonstrate the SRI index assessment and inclusion rates over the life of the index.

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*Figure 5 – SRI Index assessment and inclusion statistics*
Prescribed formats exist in the listing requirements for financial reporting and disclosure on issues such as governance, but while King III promotes GRI as a useful tool for sustainability reporting, and the Integrated Reporting Committee of South Africa has endorsed the International Integrated Reporting Framework, the JSE itself does not endorse or prescribe any particular reporting format as we believe it is important for companies to follow a reporting journey that aligns with their business model and communication objectives. Our focus through the SRI Index has been on identifying the key policies and practices that companies have to communicate about and going forward will be on identifying those key indicators and metrics that will be useful for investors to incorporate into their valuation and analysis of companies.

7. **What incentives (i.e., public recognition/awards) and sanctions do you have in place to encourage disclosure and discourage non-compliance/lower levels of transparency?**

In so far as censures for non-compliance on listing requirements, Issuer Regulation’s starting point is to dialogue with the company to understand why no narrative was produced. The first port of call is engagement and to request that the omitted narrative be made. The process is also to try and understand if the company is experiencing some difficulty be it a shortage of resources, or something more serious with implications.

The level of sanction imposed will vary according to the severity of the transgression and the company’s response, and may commence with a notification letter, progressing through to directives, fines, suspension and delisting at the extreme end of the spectrum where a company’s actions are in total violation of the rules, with no effort or intention to rectify.
In as far as compliance with the King III requirements are concerned, non-compliance has not required significant public sanction, bilateral conversation has mostly been sufficient to achieve compliance.

As regards the SRI Index, the approach has always been to ensure positive influence as opposed to naming and shaming. Inclusion in the SRI Index is a significant reputational value proposition for companies, and the increasing exposure to investors who seek sustainable stocks and opportunities for interaction with institutions interested in this investment sphere is a major driver of action. It has been very encouraging to see the high levels of companies who have incrementally met the threshold and those who have maintained their status in the index since inception of the Index, and particularly from the early days between 2004 and 2006 when the assessment process was entirely voluntary.

The assessment has been conducted automatically since 2007 where public information was assessed automatically. At each iteration, the response rate has averaged 80%, evidencing companies' commitment to a more holistic valuation beyond pure financials.

Since 2007 the Index process also recognises best performers who meet a higher threshold against the indicators.

With investor engagement seen as a key incentive for companies, the JSE introduced the annual ESG investor briefing event in 2011. Select companies in the SRI Index present their sustainability strategies (and increasingly with reference to the Value Driver Framework developed by the UNPRI and UNGC). Each presentation is followed with an interactive Q and A session. This event has been highly successful with the number of institutional and boutique investors in attendance averaging around 100, providing a unique opportunity to have insight into the sustainability strategy of the presenting entity, and the opportunity to engage on specific elements.

8. What connections have you made between national sustainable development frameworks and goals, and your exchange's existing standards and norms?

In terms of a national response to sustainability, the main framework for development is the National Development Plan (NDP) which sets out a series of goals, including sustainability, particularly in so far as a multipronged approach to reducing carbon emissions in dealing with the impact of climate change. The plan has been set to roll out over the next 30 years and as the exchange, we have undertaken to support some of the priorities in the plan through dialogue, engagement etc. In evolving the SRI Index criteria and the future indicators, efforts continue to ensure alignment with the NDP.

The South African government is a member of the Group of Friends of Paragraph 47 which was formed at the Rio+20 sustainability summit in 2012, committing to collaborate with each other and private sector organisations to promote organisational sustainability and transparency. We maintain contact with the relevant government department in as far as the ongoing work of the group is concerned, including following their input into the process to develop the Sustainable Development Goals.

The South African regulatory environment has been progressive through the promulgation of Regulation 28 of the Pensions Fund Act, which requires pension fund trustees to consider all relevant factors, including across ESG, that may impact funds and investment thereof. The JSE was closely involved in the redrafting of Regulation 28 and provided input to a corollary project to develop an asset owners guide for pension funds in implementing the new requirements.
In relation to transformative issues which impact the financial ecosystem, the exchange is also actively involved in local discussions around Black Economic Empowerment (BEE), including through implementation of the Codes of Good Practice as well as involvement in the evolution of the Financial Sector Charter. Work to enhance and establish a BEE board for BEE share schemes is ongoing.

Beyond these efforts we sustain presence on a number of committees and panels that we believe offer opportunities for us to exert influence or enhance our own understanding of trends, as mentioned earlier on in this communication.

**ISSUER CAPACITY BUILDING**

9. If your exchange offers sustainability guidance for companies, please provide a description of the process for its creation.

The two core sources of guidance endorsed to date by the JSE are the King Code on Corporate Governance, and the indicators of the SRI Index.

King III contains a set of 75 principles that span governance ethics and sustainability, which, supported by practice notes and points describing implementation approaches, offer companies significant guidance on advancing their own sustainability and governance efforts. Through its standing membership of the King Committee, the JSE has played a pivotal role in the development of content in each iteration of the Code, with involvement in the development of King IV currently underway.

Beyond King, the main driver of guidance has been the SRI index criteria. The Index was initiated at a time when the sustainability debate was burgeoning and it became apparent that some kind of guidance was needed to help companies buy in to the ensuing sustainability debate, and offer investors opportunity to acknowledge good strides.

In developing the first set of indicators, an extensive consultative process ensued with listed and non listed companies, investors, some independent interest groups and auditing firms. This process was overseen by the SRI Index Advisory Committee which consists of experts across listed companies, investors, academia and the sustainability industry. It was also supported by extensive research across sustainability guidance that existed at the time, locally and internationally, such as various human rights charters, the ILO Labour Principles, GRI, UNGC, OECD Guidelines for Multinational Enterprises, etc. to draw common trends. The first set of criteria were subject to extensive public scrutiny and a pilot process before implementation with the first Index in 2004. Over the years the criteria have evolved in keeping with global trends, with new criteria always being subject to testing to determine what level to set the benchmark at. The criteria not only serve as a benchmark for companies striving to be or remain included in the SRI Index, but the indicators also offer an aspirational yardstick for companies that are not at the requisite levels or who are not eligible. The current criteria are available at [https://www.jse.co.za/services/market-data/indices/socially-responsible-investment-index](https://www.jse.co.za/services/market-data/indices/socially-responsible-investment-index).

There have been two formal strategic reviews over the Index life cycle (2006 and 2012) to inform the strategic evolution of the index, with participation from targeted stakeholders, mainly issuers and investors and broader stakeholders.
The Index was deliberately evolutionary and developmental, and as mentioned earlier on, after having been operational for ten years, the JSE is transitioning to a new model that will focus on encouraging the reporting of investment-grade data and metrics, offering greater transparency by enabling access for investors to the underlying data as well as the individual assessments.

Moving forward we will also strengthen our focus on enabling the interface between issuers and investors, through educational seminars and other interactive opportunities, continuing the ESG Investor briefing and exploring the need for topical research and analysis.

10. Do you and/or your regulator provide guidance on externally assuring ESG disclosures? In your market, how common is external assurance of ESG disclosures?

Audit of financial reporting is required. For sustainability and integrated reporting, assurance is not required. In the SRI Index, assurance is a desirable indicator but understanding the challenges and shortcomings of assurance, it is not a requirement. In our experience, assurance of ESG information is common amongst the larger multinational companies, even limited assurance of certain elements of the reporting. We do not intend to make assurance a requirement for integrated reporting given the nascent nature of integrated reporting and the evolution of combined/integrated assurance.

COLLABORATION AND ENGAGEMENT

11. How do you engage and collaborate (or plan to do so) with: regulators, peer exchanges, investors, companies, global organizations and other stakeholders?

Since the launch of the index, it has become a key part of the JSE’s brand and positioning. The SRI Index has enhanced key relationships with issuers and investors, as the Index process has been the main access point for the JSE to engage companies and investors on issues of ESG. As our approach broadens and evolves, we intend to maintain the relationships established through the SRI Index through events, bilateral conversations, sector-focused interactions and the various committees and panels that we serve on.

We highly value the interaction with our peers through the Sustainable Stock Exchanges Initiative and the World Federation of Exchanges, and will continue to cherish these interactions.

Wherever possible we leverage our generic stakeholder engagement approach (see http://www.jsereporting.co.za/ar2014/overview/our-stakeholders.asp) to engage on ESG concepts where appropriate and possible.
SUSTAINABLE PRODUCTS

12. How has your exchange supported the development of financial products that address sustainability-related issues (e.g., ESG Indices, carbon markets, social/environmental bonds, sustainable development funds, etc.)?

The SRI Index was the first of its kind in an emerging market and by a stock exchange and is our flagship sustainability product. At the moment the series includes the SRI Index which is calculated live with a market capitalisation weighting, and a Shareholder Weighted variety which is focused on domestic shareholding. The JSE has progressed well to realise the transition process foreseen in the strategy to evolve the SRI Index. Announcements will follow soon, but the JSE is confident that the process will bring more flexibility and expanded opportunities for a product and service offering that will meet the growing interest of our clients in understanding the sustainability impacts of the companies listed on the JSE. The 2014 annual review of the SRI Index saw a record number of 82 constituents, with nine best performers.

The JSE has been actively involved in the discussions around carbon markets and a number of years back collaborated on a feasibility study. Given uncertainty around the regulatory position at the time, this was not pursued despite promising feasibility. With clarity on the government’s carbon tax approach, the discussions have resumed, and the JSE has declared itself able and willing to facilitate the relevant trading activity. The JSE previously had carbon credit notes listed which have since matured and delisted.

Another feasibility study on creating a board for public benefit organisations was conducted but not implemented due to institutional constraints.

June 2014 saw the listing of the first green bond on the JSE, a ZAR1.46 billion (US$140 million) municipal bond issued by the City of Johannesburg, which will be used to fund green initiatives within South Africa’s largest city, and which will mature in 2024. Johannesburg is the first city in the C40 Cities Climate Leadership Group to issue a green bond. The bond auction, which took place in the week before the listing, was 150% oversubscribed, supporting the JSE’s perception of a growing interest in a broader range of products that could support sustainable development. We are currently perceiving a growing interest in green bonds and will pursue discussions with potential issuers in this regard.

EXCHANGE NEEDS

13. Are there specific resources (meetings, commissioned research, webinars etc) that you would like from the SSE or other relevant groups to help you in your sustainability work?

We are satisfied with the interactive opportunities offered by the SSE, and value the interaction it offers with other actors along the investment value chain through the UNGC and UNPRI. This can be expanded, as we believe it is important to be able to open up the conversation and have interaction with more of the global investor community to get a deeper understanding of how they are currently using the information available from issuers as well as exchanges involved in this space.
Beyond this it would certainly be interesting to get access to more empirical research on ESG integration into investment, with particular focus on equities and share price impacts. Also given expanded growth and interest in other asset classes, understanding the different technical aspects would be interesting, e.g. through webinars with relevant experts or practitioners in related areas.

14. Are there any specific requests you have of investors, issuers and regulators in terms of their role in advancing sustainability in the market?

The hope always is for more actors in the investment value chain, asset owners, analysts, brokers etc., to join the conversation and integrate ESG into the mainstream. Sustainability is a growing field, and with the right impetus from investors, not only can environmental, social and governance practises be enhanced for the betterment and preservation of natural resources and creation of new, green economies be seen, but sustainable returns can be more easily realised.

As integrated reporting becomes more and more the standard for company disclosure, it would be progressive to have more investor road shows and investor engagements encompassing all aspects of what drives value for different stakeholders. Promotion of ESG investor engagement in the main can help accelerate the process of having sustainability become business as usual. The SSE’s role in promoting this lever will greatly enhance individual exchange efforts.

Investors also need to begin walking the talk by understanding portfolio exposure to ESG risk and employing the same levels of transparency expected from investee companies in relation to management of funds, especially amongst institutions where the ultimate beneficiary may be a current or future pensioner who will rely on a sustainable long-term return.