



Nature Action 100

Driving greater corporate ambition and action to tackle nature loss

Nature Action 100 Benchmark Overview



May 2024

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INTRODUCTION The urgent need for investor action on nature



Nature Action 100 is a global investor-led engagement initiative that aims to support greater corporate ambition and action on reversing nature and biodiversity loss to mitigate financial risk and to protect the long-term economic interests of investors' clients and beneficiaries.

In the economic interest of investors and their beneficiaries, Nature Action 100 supports investors engaging companies on nature loss by:

- **Amplifying the investor voice** with clear high-level expectations for companies.
- **Focusing efforts** on impactful sectors, regions, and companies to address nature loss.
- **Informing and supporting engagements** between participating investors and the Nature Action 100 companies.
- **Tracking corporate performance** against key benchmark indicators and providing annual progress updates.

NATURE LOSS IS A BUSINESS RISK

- The global economy is nested within Earth systems and all economic activity is dependent on nature in some form.¹
- Nature loss poses financial risks to companies including:
 - **Physical risk**—posed by acute events or chronic incremental changes resulting from the loss of ecosystem services on which the company depends.
 - **Transition risk**—posed by changes in nature-related policies or regulation, market prices and preferences, competing technologies or the company's reputation.
 - **Systemic risk**—posed by the disruption to the wider natural or economic systems in which the company is operating.
- The global financial sector has a vital role to play in accelerating a shift toward more sustainable and regenerative business models thus mitigating economic risk.

1. [When the Bee Stings: Counting the Cost of Nature-Related Risks](#), BloombergNEF.





NATURE ACTION 100 BY NUMBERS

Over

200

institutional investors

Representing nearly

\$30 trillion

globally in assets under management and advice²

Engaging

100

companies to take action on nature


Prioritizing

8


sectors important to reversing nature and biodiversity loss

SECTORS AND COMPANIES

Investors participating in the initiative engage companies in eight priority sectors deemed systemically important in reversing nature and biodiversity loss by 2030:



Biotechnology & Pharmaceuticals
(10)



Chemicals
(15)




Consumer Goods Retail
(10)




Food
(28)



Food & Beverage Retail & Restaurants
(10)



Forestry & Paper Products
(10)

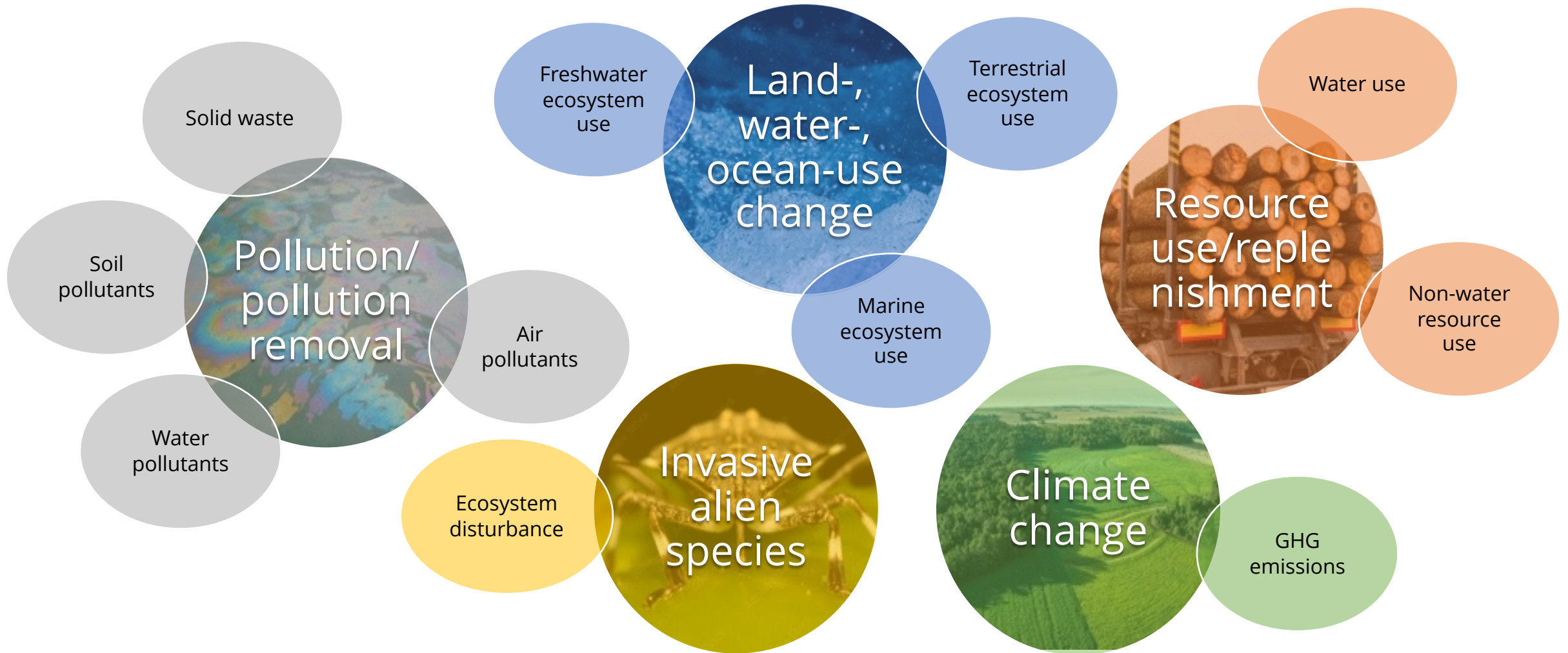


Household and Personal Goods
(7)



Metals & Mining
(10)

ADDRESSING DRIVERS OF NATURE LOSS



DEVELOPING THE COMPANY BENCHMARK

- Comprehensive research assessment of best practices grounded in science and the evolving nature landscape to ensure the benchmark adds unique value.
- Alignment with existing nature frameworks, such as the Science Based Targets Network (SBTN) and the Taskforce on Nature-related Financial Disclosures (TNFD).
- Extensive consultation with dozens of Nature Action 100 investor participants and experts from organizations and universities around the world, including Indigenous representatives and groups that work closely with Indigenous Peoples and local communities.

UPCOMING MILESTONES

SUMMER 2024

- Collect publicly available company data (annual reports, 10-K filings).
- Conduct assessments of companies against the benchmark indicators.
- Company review period.

LATE 2024

- Release of full benchmark methodology.
- Release company benchmark assessments.
- Benchmark assessments inform investor engagement priorities.



COMPANY BENCHMARK

Indicator overview



INDICATOR 1: AMBITION

Investor Expectation: Publicly commit to minimize contributions to key drivers of nature loss and to conserve and restore ecosystems at the operational level and throughout value chains by 2030.

Overview: A public commitment can help set an entity-level strategic direction for companies and demonstrates an intent to navigate nature-related risks and opportunities. Setting a public commitment can elevate combatting nature loss to a board-level issue and help increase accountability. Corporate nature commitments should align with timelines set out in [The Biodiversity Plan](#) and address the key drivers of nature loss identified by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services. Moreover, corporate action should extend beyond its direct operations to its wider value chain where many of its impacts on nature may occur.

This indicator assesses the presence of high-level commitments by companies. This is distinct from Indicator 3 on targets, which assesses company disclosure of time-bound, context-specific, nature-related targets.



Sub-indicator 1.1.

The company has a commitment to avoid and reduce key drivers of nature loss and/or to restore and regenerate ecosystems, throughout its value chain.

Metric 1.1.a. The company commits to avoid and reduce its contributions to key drivers of nature loss and/or restore and regenerate ecosystems.

Metric 1.1.b. The company commitment explicitly extends to the company's value chain.



Sub-indicator 1.1.

Overview: This sub-indicator assesses whether companies have made a high-level public commitment to address nature loss throughout their value chain. Specifically, it assesses public disclosure of company commitments to avoid and reduce key drivers of nature loss and to restore and regenerate ecosystems.

Framework alignment:

This sub-indicator broadly aligns with the Commit component of the [Nature Strategy Handbook](#) by It's Now for Nature.



INDICATOR 2: ASSESSMENT

Investor Expectation: Assess and publicly disclose nature-related dependencies, impacts, risks, and opportunities at the operational level and throughout the value chain.

Overview: By conducting a thorough assessment of nature-related dependencies, impacts, risks, and opportunities across their entire value chain, companies can equip themselves with the information needed to integrate nature into strategic planning, including setting appropriate targets, and decisions on capital allocation. Disclosure of assessment results also allows investors to understand the risks and opportunities in their investment portfolio.

The sub-indicators in this section are aligned with the TNFD recommended disclosures and the TNFD LEAP approach, including locating where activities are interfacing with nature.



Sub-indicator 2.1.

The company publicly discloses the location of all assets and activities in its direct operations and upstream and downstream value chain that are situated in or adjacent to ecologically sensitive locations.

Metric 2.1.a. The company publicly discloses all locations where it has assets and activities within its direct operations that are situated in or adjacent to ecologically sensitive locations.

Metric 2.1.b. The company publicly discloses all locations of assets and activities within the upstream portion of its value chain that are situated in or adjacent to ecologically sensitive locations.

Metric 2.1.c. The company publicly discloses all locations of assets and activities within the downstream portion of its value chain that are situated in or adjacent to ecologically sensitive locations.



Sub-indicator 2.1.

Overview: Nature-related dependencies, impacts, risks, and opportunities are highly location specific. A credible assessment thus begins with identifying the locations within companies' operations or value chain that interface with, or are embedded within, ecologically sensitive regions as per the TNFD recommendations.

This sub-indicator assesses whether companies publicly disclose the locations where assets and/or activities in their value chain occur in close proximity to ecologically sensitive locations. Disclosure of material locations is covered in Sub-indicator 2.2.

Framework alignment:

This sub-indicator aligns with the TNFD [Recommended Disclosure](#) Strategy D and the Locate phase of the TNFD [LEAP approach](#).



Sub-indicator 2.2.

The company assesses and publicly discloses its material dependencies and impacts on nature within its own operations and throughout its value chain.

Metric 2.2.a. The company undertakes and publicly discloses the results of an assessment of its material dependencies on nature in its direct operations.

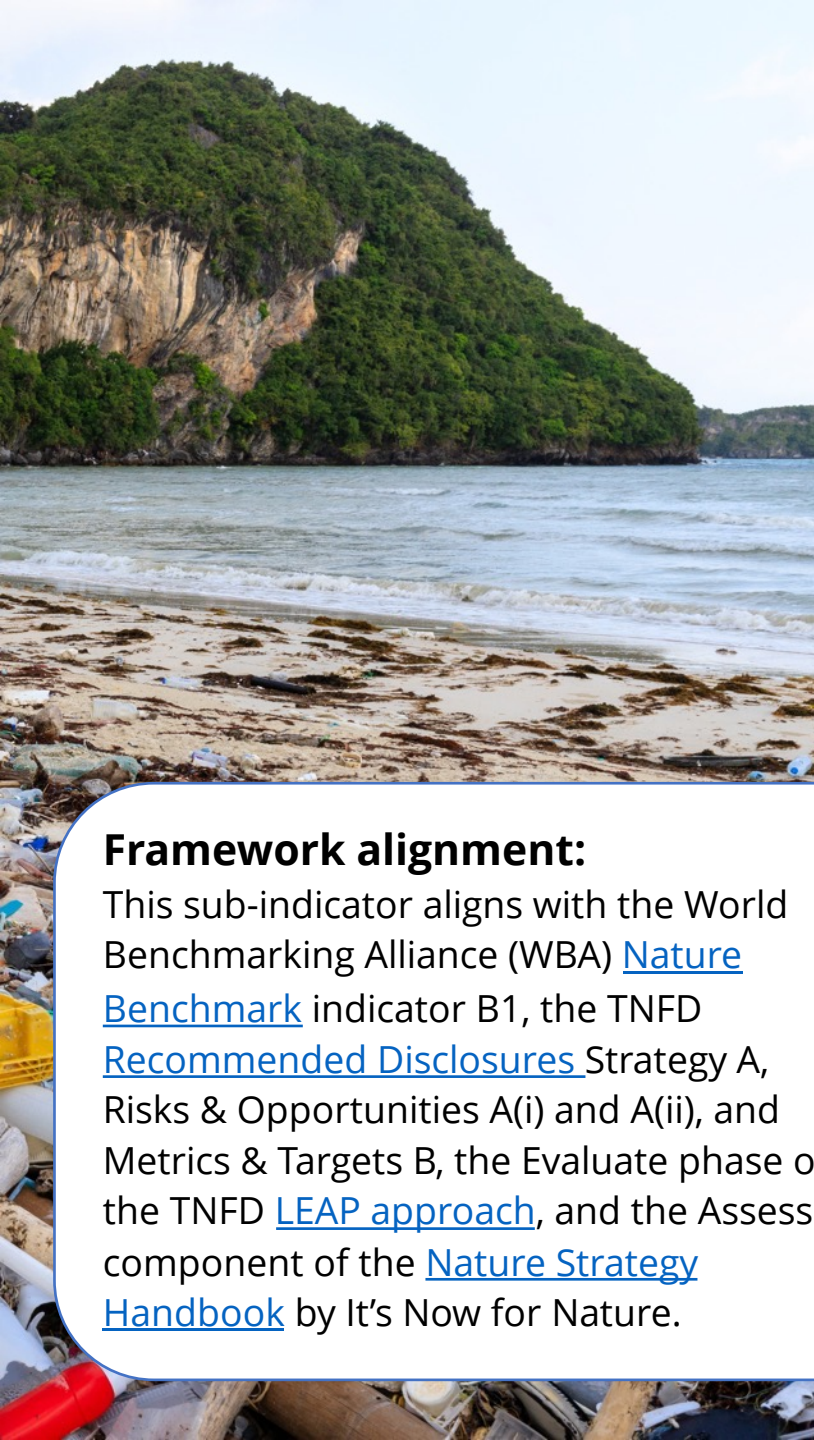
Metric 2.2.b. The company undertakes and publicly discloses the results of an assessment of its material dependencies on nature in the upstream portion of its value chain.

Metric 2.2.c. The company undertakes and publicly discloses the results of an assessment of its material dependencies on nature in the downstream portion of its value chain.

Metric 2.2.d. The company undertakes and publicly discloses the results of an assessment of its material impacts on nature in its direct operations.

Metric 2.2.e. The company undertakes and publicly discloses the results of an assessment of its material impacts on nature in the upstream portion of its value chain.

Metric 2.2.f. The company undertakes and publicly discloses the results of an assessment of its material impacts on nature in the downstream portion of its value chain.



Sub-indicator 2.2.

Overview: A comprehensive assessment of nature-related dependencies and impacts is foundational to companies' efforts to manage their interface with nature. As defined by the TNFD, dependencies are aspects of environmental assets and ecosystem services that companies rely on to function. Impacts are changes in the state of nature, in terms of quantity or quality. An assessment allows companies to identify corresponding risks and opportunities and integrate nature into strategic planning, including setting meaningful targets.

This sub-indicator assesses companies' public disclosure, quantification, and valuation of material impacts and dependencies throughout its value chain, including the locations where such impacts and dependencies occur.

Framework alignment:

This sub-indicator aligns with the World Benchmarking Alliance (WBA) [Nature Benchmark](#) indicator B1, the TNFD [Recommended Disclosures](#) Strategy A, Risks & Opportunities A(i) and A(ii), and Metrics & Targets B, the Evaluate phase of the TNFD [LEAP approach](#), and the Assess component of the [Nature Strategy Handbook](#) by It's Now for Nature.



Sub-indicator 2.3.

The company assesses and publicly discloses the risks and opportunities stemming from material dependencies and impacts on nature.

Metric 2.3.a. The company undertakes and publicly discloses the results of an assessment of the material risks stemming from material dependencies and impacts on nature.

Metric 2.3.b. The company undertakes and publicly discloses the results of an assessment of its material opportunities stemming from material dependencies and impacts on nature.



Sub-indicator 2.3.

Overview: Companies should assess and prioritize their material nature-related risks and opportunities, which may stem from their own or societal material dependencies and impacts on nature. By assessing, valuing, and prioritizing their material risks and opportunities, companies are equipped with the necessary information to establish meaningful targets and make informed changes to business operations.

Framework alignment:

This sub-indicator aligns with elements of the TNFD [Recommended Disclosures](#) Strategy A, Risk & Impact Management A(i) and A(ii), and Metrics & Targets A, in addition to Sub-indicator 3.2X of the [Valuing Water Finance Initiative Benchmark](#). This sub-indicator also broadly aligns with the Assess phase of the TNFD [LEAP approach](#) and the Assess component of the [Nature Strategy Handbook](#) by It's Now for Nature.

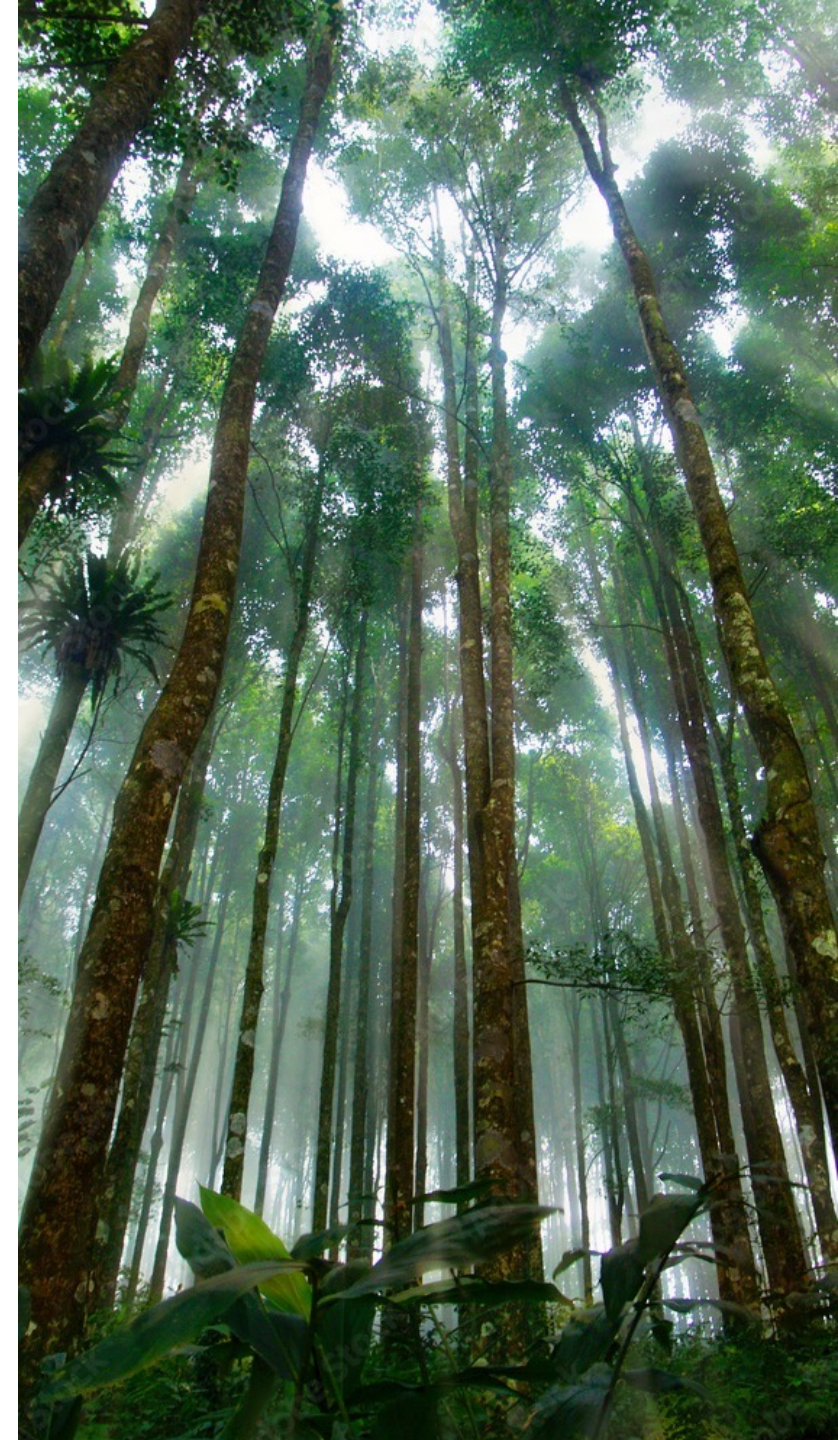
This sub-indicator assesses companies' public disclosure, quantification, and valuation of material risks and opportunities, including the time horizons within which they may materialize.

INDICATOR 3: TARGETS

Investor Expectation: Set time-bound, context-specific, science-based targets informed by risk assessments on nature-related dependencies, impacts, risks, and opportunities. Disclose annual progress against targets.

Overview: Once companies have assessed their nature-related dependencies, impacts, risks, and opportunities, they can set meaningful targets. Targets can focus action to deliver on companies' strategic commitments (see Indicator 1) and help them navigate their nature-related impacts, dependencies, risks, and opportunities. They also allow investors to understand how companies intend to manage their interface with nature.

This indicator assesses whether companies have set comprehensive, robust targets and whether they regularly report on progress towards target completion.



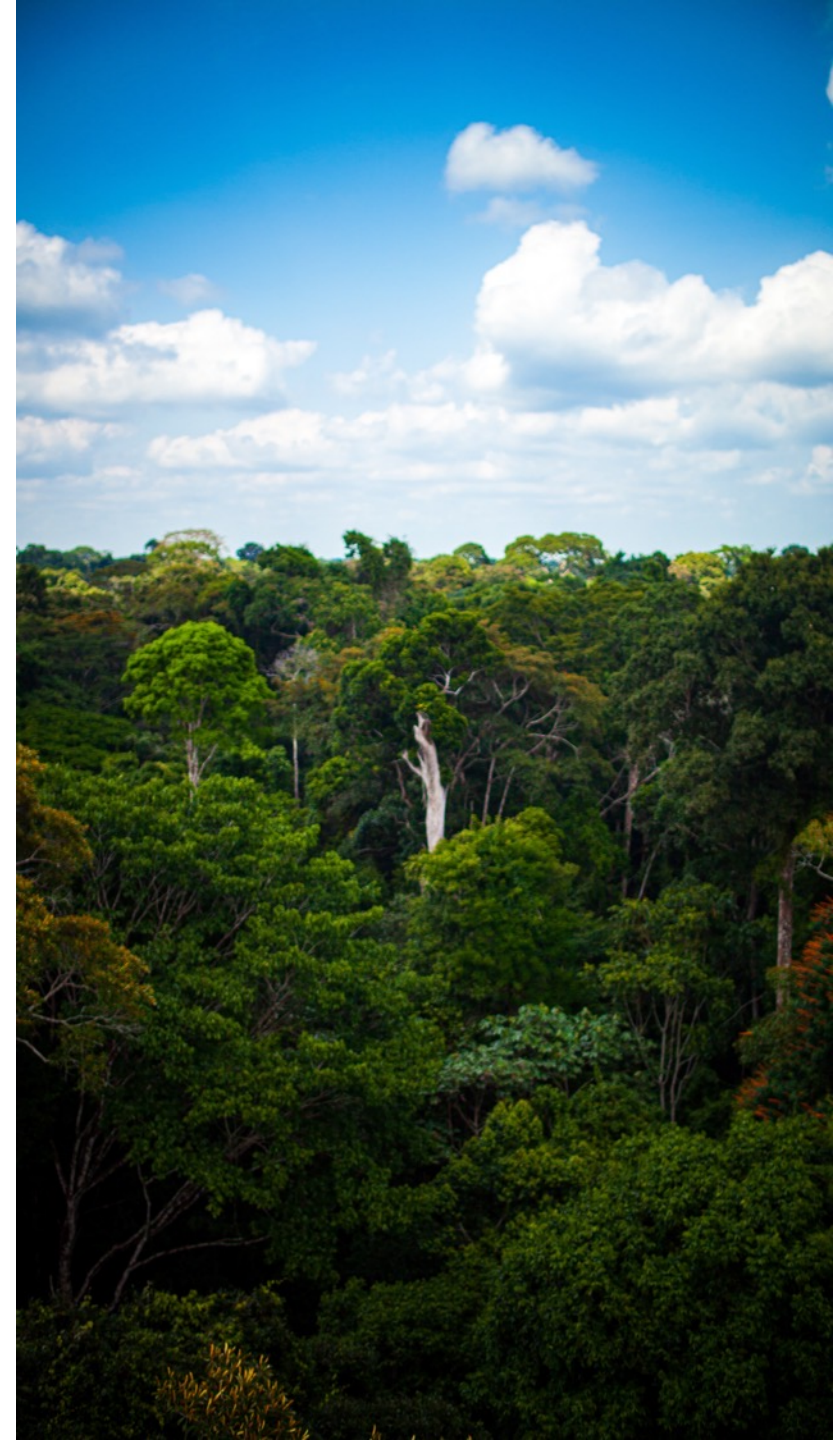
Sub-indicator 3.1.

The company has comprehensive and measurable targets to avoid and reduce key drivers of nature loss and to restore and regenerate ecosystems.

Metric 3.1.a. The company publicly discloses targets to manage nature-related dependencies, impacts, risks, and/or opportunities.

Metric 3.1.b. The company targets pertain to avoiding and reducing drivers of nature loss.

Metric 3.1.c. The company targets pertain to restoring and regenerating ecosystems.



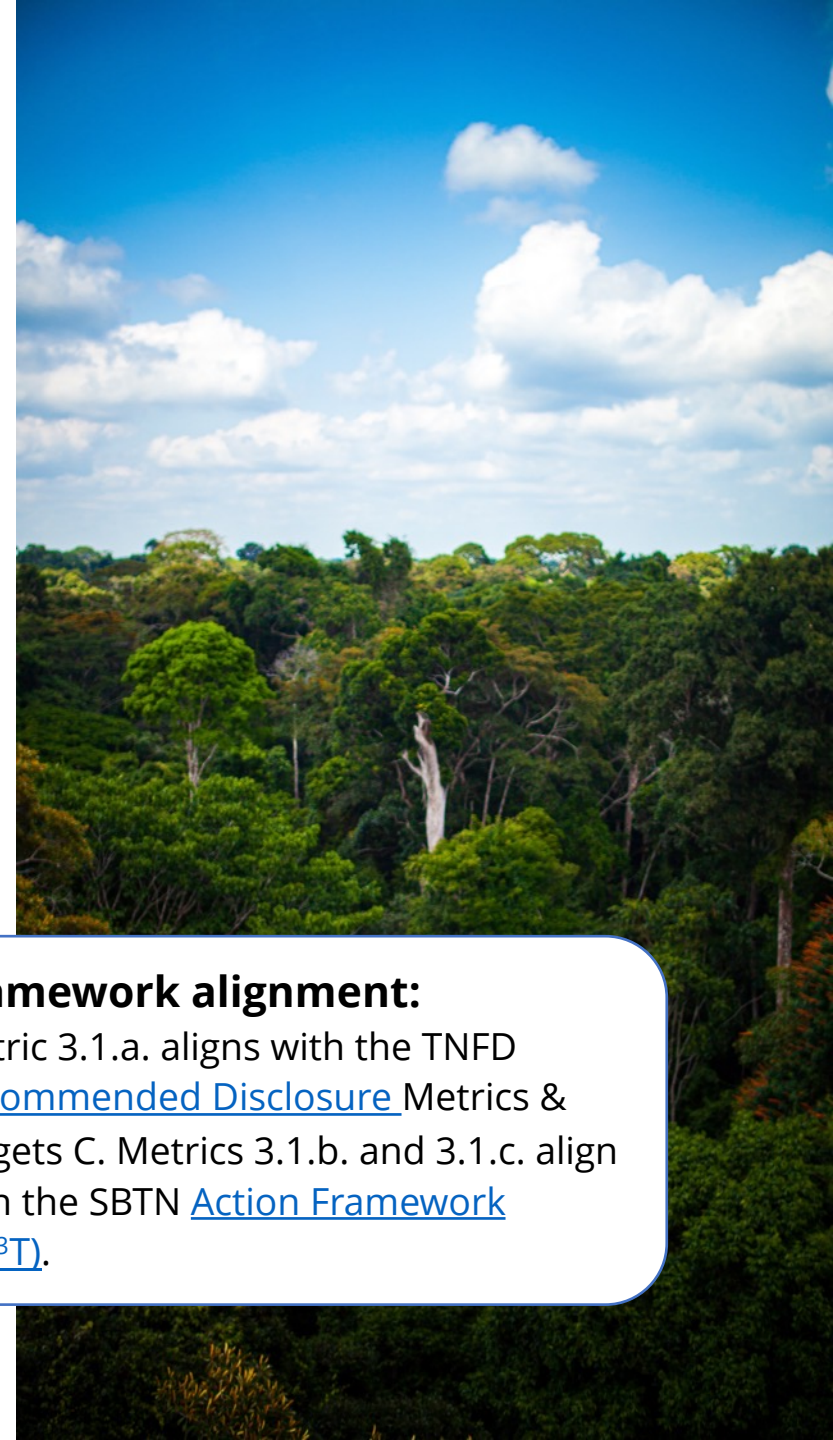
Sub-indicator 3.1.

Overview: A comprehensive suite of nature-related targets would include actions to stem existing harm to nature and conserve and restore ecosystems, which enables companies to mitigate their nature-related risks. Depending on companies' business models and their nature-related impacts and dependencies, these objectives may be captured in one or multiple targets.

The first metric of this sub-indicator assesses whether companies have set any nature-related targets—whether these relate to dependencies, impacts, risks, or opportunities. The subsequent metrics assess whether companies' targets support positive outcomes for nature by avoiding and reducing key drivers of nature loss and restoring and regenerating ecosystems.

Framework alignment:

Metric 3.1.a. aligns with the TNFD [Recommended Disclosure Metrics & Targets C](#). Metrics 3.1.b. and 3.1.c. align with the SBTN [Action Framework \(AR³T\)](#).



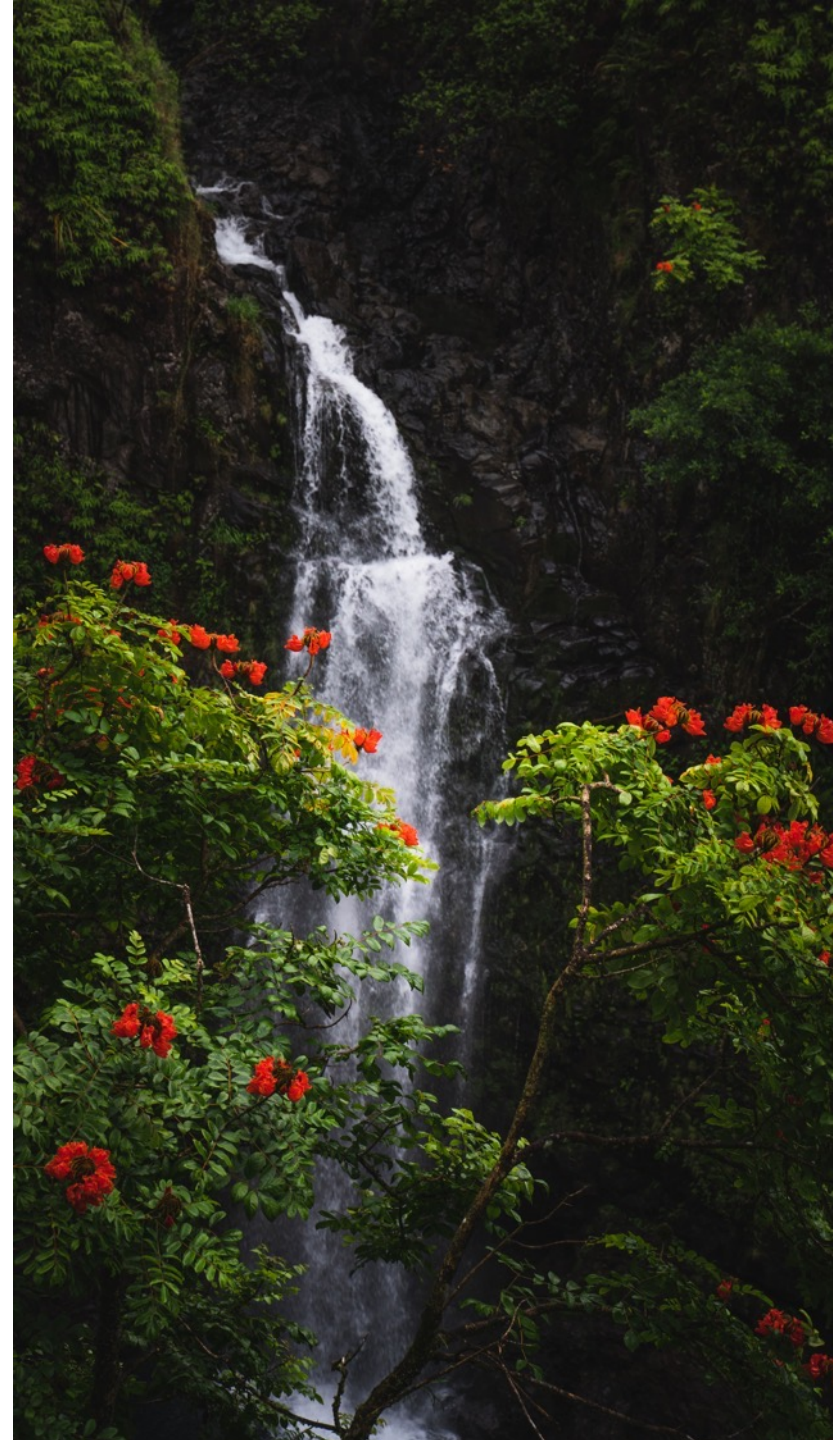
Sub-indicator 3.2.

The company's targets pertain to its material nature-related dependencies and impacts, are validated by an impartial and independent third party, and are designed in an integrated manner that takes account of the company's climate targets.

Metric 3.2.a. The company publicly discloses that its targets pertain to its material nature-related dependencies and/or impacts.

Metric 3.2.b. The company's targets have been validated by an independent third party.

Metric 3.2.c. The company explains how its nature-related targets support, align, or integrate with its climate change targets.



Sub-indicator 3.2.

Overview: In addition to ensuring targets achieve a spectrum of positive outcomes for nature, companies should also ensure their targets address the most pressing nature-related issues and are based on a robust methodology. This helps companies to optimize the long-term sustainability of their business model.

To this end, this sub-indicator assesses whether nature-related targets address companies' most material nature-related dependencies and impacts, have been validated by an independent third party, and are mutually supportive with companies' climate targets.

Framework alignment:

Metrics 3.2.b. and 3.2.c. align with elements of the Commit component of the [Nature Strategy Handbook](#) by It's Now for Nature.

Sub-indicator 3.3.

The company publicly discloses its progress toward its targets on an annual basis.

Metric 3.3.a. The company publicly discloses its progress toward its nature-related targets within the last reporting year, with reference to the baseline or reference condition.



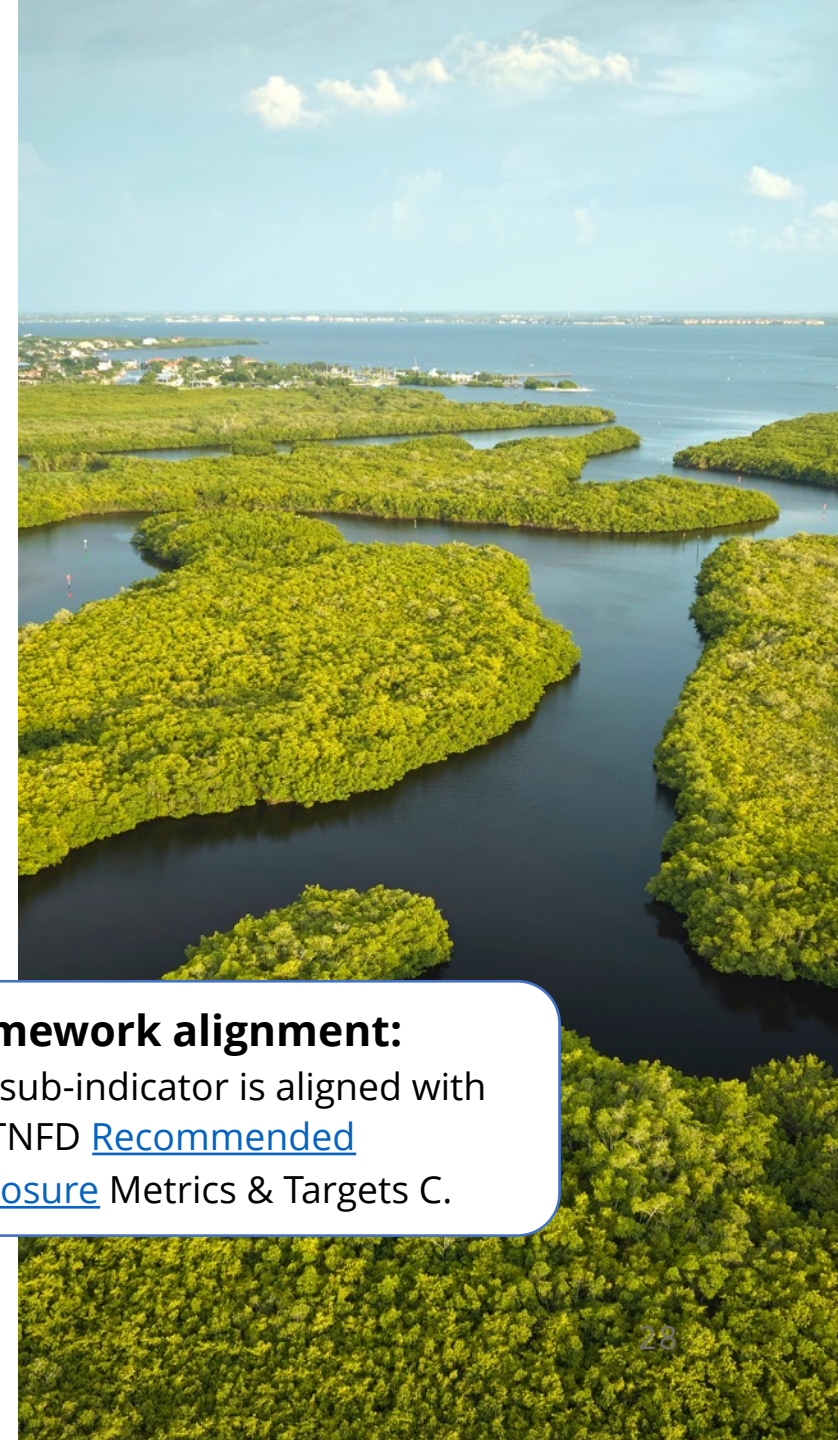
Sub-indicator 3.3.

Overview: Disclosure of progress gives stakeholders (including investors) visibility into whether companies are on track to achieving their targets and creates a basis for accountability.

This sub-indicator assesses whether companies disclose their progress toward achieving their targets.

Framework alignment:

This sub-indicator is aligned with the TNFD [Recommended Disclosure](#) Metrics & Targets C.





INDICATOR 4: IMPLEMENTATION

Investor Expectation: Develop a company-wide plan on how to achieve targets. The design and implementation of the plan should prioritize rights-based approaches and be developed in collaboration with Indigenous Peoples and local communities when they are affected. Disclose annual progress against the plan.

Overview: In addition to setting targets, companies should develop a clear strategy outlining the actions they will take to achieve their targets. This should include alignment of their financial strategy with their targets. In addition, companies should ensure that their actions pertaining to nature—including actions to reduce negative impacts—are undertaken in a manner that respects the rights of Indigenous Peoples and local communities and acknowledges their fundamental contributions to the sustainable management of nature. Collectively, these measures allow investors to understand whether companies are taking tangible steps to meet their targets.

This indicator assesses the presence of corporate strategies to meet companies' targets, including alignment of fiscal policy. It also assesses the presence of comprehensive policies to respect the rights of Indigenous Peoples and local communities.



Sub-indicator 4.1.

The company publicly discloses a strategy for achieving its nature targets.

Metric 4.1.a. The company publicly discloses a strategy setting out the actions it intends to take to achieve its nature-related targets.

Metric 4.1.b. The company publicly discloses progress on its strategy in the last reporting year.

Metric 4.1.c. The company explains how the actions it intends to take on nature support, align, or integrate with its actions on climate.

Sub-indicator 4.1.

Overview: For targets to be considered credible, they should be supported by a strategy that clearly sets out how the company will achieve them. In addition to disclosing a strategy and reporting its progress annually, companies should consider the extent to which their nature-related strategies interact with their actions on climate. Integrated strategies that align corporate actions on nature and climate can reduce conflicts, optimize process efficiency, and achieve the most favorable outcomes for companies, society, and the environment.

This sub-indicator assesses whether companies publicly disclose a strategy to achieve their nature-related targets, including annual progress updates, and whether their nature and climate strategies are aligned.

Framework alignment:

This sub-indicator aligns with elements of the Transform component of the [Nature Strategy Handbook](#) by It's Now for Nature.



Sub-indicator 4.2.

The company respects and upholds the rights of Indigenous Peoples and local communities.

Metric 4.2.a. The company commits to recognize and respect the rights of Indigenous Peoples and local communities.

Metric 4.2.b. The company facilitates full, meaningful, and effective participation through free, prior, and informed consent (FPIC) of Indigenous Peoples and local communities in the planning and implementation of activities that have the potential to impact their rights.

Metric 4.2.c. The company ensures equitable access for Indigenous Peoples and local communities to land, resources, and territory where they hold rights or interests.

Metric 4.2.d. The company ensures equitable benefit sharing with Indigenous Peoples and local communities arising from using land and/or natural resources where they hold rights or interests.

Metric 4.2.e. The company publicly discloses that it requires its tier 1 suppliers to recognize and respect the rights of Indigenous Peoples and local communities and to obtain their free, prior, and informed consent.



Sub-indicator 4.2.

Overview: Companies should ensure that they act in a manner that respects the rights of Indigenous Peoples and local communities and establish equivalent expectations for their suppliers. Through constructive relationships with Indigenous Peoples and local communities, companies can co-design effective and inclusive strategies for managing nature-related issues that are informed by traditional knowledge. Failure to respect the rights of Indigenous Peoples and local communities can lead to material risks, including reputation damage, operational delays, and legal costs.

Framework alignment:

This sub-indicator aligns with WBA's [Nature Benchmark](#) Indicator C2 and best practices set out in the TNFD [Guidance on engagement with Indigenous Peoples, Local Communities, and affected stakeholders](#). It also aligns with elements of [Respecting Indigenous Rights: An Actionable Due Diligence Toolkit for Institutional Investors](#).

To this end, this sub-indicator assesses whether companies commit to recognize and respect the rights of Indigenous Peoples and local communities, including their land tenure and access rights. It also assesses whether companies ensure the full and effective participation of Indigenous Peoples and local communities in the planning of activities that have the potential to impact their rights, and that companies facilitate equitable access and benefit sharing.

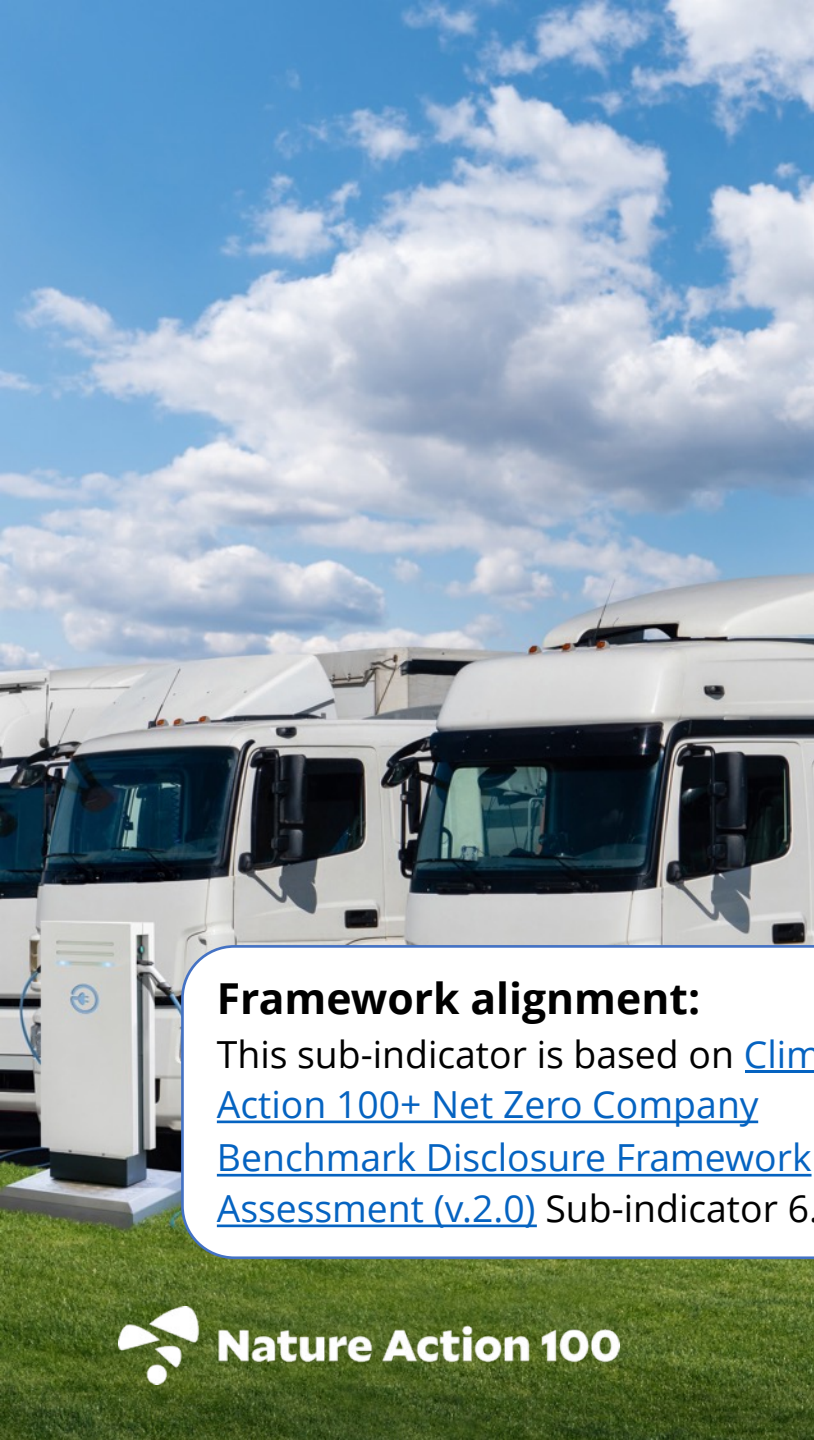


Sub-indicator 4.3.

The company's fiscal policies are aligned with achievement of its nature-related targets.

Metric 4.3.a. The company publicly discloses how it has allocated expenditure to achieve its nature targets in the last fiscal year.

Metric 4.3.b. The company publicly discloses forward-looking guidance on how it intends to allocate expenditure to achieve its nature targets.



Sub-indicator 4.3.

Overview: A key metric of whether companies are committed to their nature-related targets is whether they have taken steps to allocate financial resources towards achieving their targets, in line with their fiduciary obligations and business judgement.

To this end, this sub-indicator assesses whether companies are taking actions to align their past and future capital and operational expenditure with achievement of their targets.

Framework alignment:

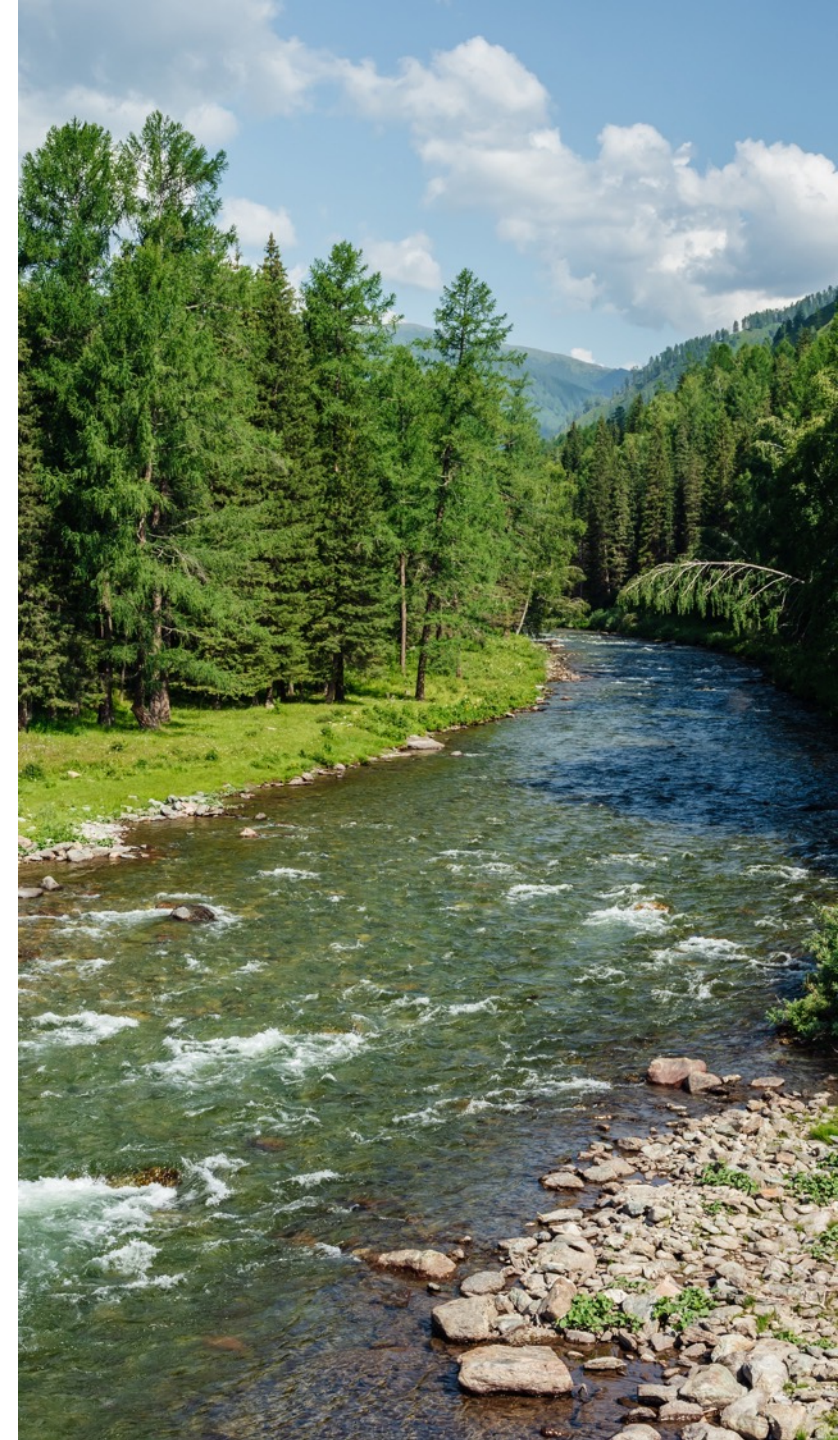
This sub-indicator is based on [Climate Action 100+ Net Zero Company Benchmark Disclosure Framework Assessment \(v.2.0\)](#) Sub-indicator 6.2.

INDICATOR 5: GOVERNANCE

Investor Expectation: Establish Board oversight and disclose management's role in assessing and managing nature-related dependencies, impacts, risks, and opportunities.

Overview: To enable companies to achieve their nature commitments and targets, and to ensure that nature-related issues are prioritized and adequately resourced, responsibility for addressing nature loss should rest with the highest decision-making body. Boards should have oversight and responsibility for companies' interactions with nature, and senior-level executives should be mandated and incentivized to drive action on nature. Top-level governance of nature-related issues signals to investors that companies are committed to managing their interactions with nature and mitigating their nature-related risks.

This indicator assesses whether company boards are both mandated and qualified to oversee nature-related issues and whether senior executives are mandated and incentivized to manage nature-related issues on an ongoing basis.



Sub-indicator 5.1.

The company board has clear oversight over its nature-related dependencies, impacts, risks, and opportunities, including implications for and engagement with Indigenous Peoples and local communities.

Metric 5.1.a. The company publicly discloses evidence of board or board committee oversight of the management of nature-related dependencies, impacts, risks, and opportunities.

Metric 5.1.b. The company publicly discloses evidence of board or board committee oversight of the management of its impacts on and engagement with Indigenous Peoples and local communities.



Sub-indicator 5.1.

Overview: Board-level oversight over nature-related issues is essential to ensure that corporate action on nature is duly prioritized and resourced. Moreover, board responsibilities should explicitly extend to ensuring Indigenous Peoples and local communities are consulted and can meaningfully participate in matters that may affect their rights or livelihoods to ensure they are not adversely impacted by company actions.

This sub-indicator assesses whether company boards are mandated to oversee their company's assessment and management of their nature-related issues, in addition to how companies manage their impacts on and engagement with Indigenous Peoples and local communities.

Framework alignment:

Metric 5.1.a. is based on [Climate Action 100+ Net Zero Company Benchmark Disclosure Framework Assessment \(v.2.0\)](#) Metric 8.1.a. It is also aligned generally with the TNFD [Recommended Disclosure Governance A](#), and WBA's [Nature Benchmark](#) Indicator A2 element b. Metric 5.1.b. is aligned with the TNFD [Recommended Disclosure Governance C](#).

Sub-indicator 5.2.

The board has sufficient expertise to oversee issues pertaining to nature-related dependencies, impacts, risks, and opportunities, including how the company's actions on nature impact Indigenous Peoples and local communities.

Metric 5.2.a. The company publicly discloses evidence that its board has sufficient expertise to oversee issues pertaining to nature-related dependencies, impacts, risks, and opportunities.

Metric 5.2.b. The company publicly discloses evidence that its board has sufficient expertise to oversee the company's impacts on and engagement with Indigenous Peoples and local communities.



Sub-indicator 5.2.

Overview: Boards must have an adequate depth of knowledge regarding nature-related issues to enable them to carry out their responsibilities in a manner that results in positive outcomes for both companies and nature. In addition, boards should have expertise to understand how company actions may impact rightsholders and how to effectively consult Indigenous Peoples and local communities.

This sub-indicator assesses whether company boards are appropriately qualified to oversee nature-related issues, including implications for Indigenous Peoples and local communities.

Framework alignment:

Metric 5.2.a. is aligned with both WBA's [Nature Benchmark](#) Indicator A2 element d, and the [Valuing Water Finance Initiative Benchmark](#) Sub-indicator 5.1XX.

Sub-indicator 5.3.

Responsibility for assessing and managing nature-related issues is assigned at the senior executive level, and executive remuneration arrangements incorporate performance on nature targets.

Metric 5.3.a. The company's chief executive officer or at least one other senior executive is responsible for assessing and managing the company's nature-related dependencies, impacts, risks, and opportunities.

Metric 5.3.b. The company's chief executive officer or at least one other senior executive is responsible for assessing and managing the company's impacts on and engagement with Indigenous Peoples and local communities.

Metric 5.3.c. The company's chief executive officer or at least one other senior executive has long-term remuneration arrangements that directly link compensation to achieving the company's nature targets.



Sub-indicator 5.3.

Overview: To ensure nature-related issues are afforded due priority and resources within companies, it is important that overarching responsibility for assessing and managing nature-related issues lies at the level of executive management. Furthermore, by linking executive remuneration to company performance on achieving nature targets, companies directly incentivize action on nature, and potentially increase the likelihood and pace at which they take action.

This sub-indicator assesses whether senior management is both mandated and incentivized to drive forward action on nature-related issues, with due consideration for the rights and interests of Indigenous Peoples and local communities.



Framework alignment:

Metric 5.3.a. aligns with the TNFD [Recommended Disclosure](#) Governance B.
Metric 5.3.c. is based on [Climate Action 100+ Net Zero Company Benchmark Disclosure Framework Assessment \(v.2.0\)](#)
Sub-indicator 8.2., Metric b.



INDICATOR 6: ENGAGEMENT

Investor Expectation: Engage with external parties including actors throughout value chains, trade associations, policy makers, and other stakeholders to create an enabling environment for implementing the plan and achieving targets.

Overview: Stakeholder engagement is essential at every step of companies' journeys to understand and reduce their dependencies and impacts on nature. This includes when companies assess their nature-related dependencies, impacts, risks, and opportunities, set targets, develop plans to achieve their targets, and cultivate an enabling environment to implement their plans. By meaningfully engaging with a diverse range of stakeholders in decision-making processes, companies can minimize risks and maximize opportunities.

This indicator assesses whether companies are engaging all necessary audiences to achieve their nature-related targets and commitments in an equitable manner.



Sub-indicator 6.1.

The company engages with its value chain to help achieve its nature targets.

Metric 6.1.a. The company has nature-related criteria for its tier 1 suppliers.

Metric 6.1.b. The company provides financial and/or technical assistance to suppliers to adopt practices that reduce their impacts and dependencies on nature.

Metric 6.1.c. The company engages its corporate customers on addressing nature-related impacts and dependencies associated with processing, use, or end-of-life treatment of sold products.

Metric 6.1.d. The company engages its end-user consumers in a shift towards products, services and/or behaviors with lower nature-related impacts and dependencies.



Sub-indicator 6.1.

Overview: Nature-related dependencies, impacts, risks, and opportunities extend beyond companies' direct operations and into the upstream and downstream portions of their value chain. Therefore, strategic engagement with suppliers and customers is often necessary to achieve nature targets.

This sub-indicator assesses whether companies engage with the upstream and downstream portion of their value chain to achieve their nature-related targets.

Framework alignment:

Metrics within this sub-indicator are based on Metrics 5e., 5f., 7b., and 7a. of the [Food Emissions 50 Company Benchmark](#).



Sub-indicator 6.2.

The company discloses direct lobbying activities and any expectations for associations it is a member of to avoid and reduce key drivers of nature loss, and restore and regenerate ecosystems, which are aligned with [The Biodiversity Plan](#).

Metric 6.2.a. The company commits to conducting its direct lobbying activities in accordance with the goals of [The Biodiversity Plan](#).

Metric 6.2.b. The company reviews its own nature policy positions' alignment with [The Biodiversity Plan](#) and discloses how it has advocated for these positions through its lobbying activities.

Metric 6.2.c. The company commits to advocate for lobbying activities aligned with [The Biodiversity Plan](#) within the trade associations they belong to.

Metric 6.2.d. The company publicly discloses the actions it has taken to ensure alignment of its trade associations' nature policy positions and lobbying activities with [The Biodiversity Plan](#).



Sub-indicator 6.2.

Overview: In addition to effecting change within their value chain, companies should also address nature loss through lobbying and advocacy, both individually and through relevant bodies such as trade associations. Companies should exercise due diligence to ensure that the trade associations they are members of are aligned with [The Biodiversity Plan](#). In instances of misalignment, companies should take appropriate responsive action.

This sub-indicator assesses the extent to which companies' direct and indirect lobbying activities align with [The Biodiversity Plan](#).

Framework alignment:

This sub-indicator aligns with [Climate Action 100+ Net Zero Company Benchmark Disclosure Framework Assessment \(v.2.0\)](#) Indicator 7, the Transform component of the [Nature Strategy Handbook](#) by It's Now for Nature, [The Global Standard on Responsible Climate Lobbying](#), and the TNFD [Recommended Disclosure Governance C](#).



Sub-indicator 6.3.

The company identifies and engages with key stakeholders on nature-related issues and incorporates the outcomes of these activities in its strategy and operations.

Metric 6.3.a. The company publicly discloses the process for identifying relevant stakeholders across its value chain and the process for engaging with stakeholder groups.

Metric 6.3.b. The company demonstrates that engagement with stakeholders informs its actions to address nature-related issues.



Sub-indicator 6.3.

Overview: Regular and meaningful engagement with stakeholders (including rightsholders, investors, local administrators, and frequently marginalized groups such as women, elderly, and frontline communities) can help companies to design robust nature strategies that are inclusive and mitigate risks to the companies, society, and nature.

This sub-indicator assesses whether companies engage with stakeholders on nature-related issues and whether such engagement informs the development or refinement of corporate strategy.

Framework alignment:

Metric 6.3.a. is based on WBA's [Nature Benchmark](#) Indicator A3 elements b and c.



Sub-indicator 6.4.

The company has a grievance and redress mechanism through which individuals and communities may raise complaints or concerns that they have been adversely impacted by the company's actions pertaining to nature.

Metric 6.4.a. The company has a mechanism for individuals and communities to raise complaints or concerns that they are or may be adversely impacted by the company, or for them to raise complaints of adverse impacts to nature.

Metric 6.4.b. The company discloses a list of grievances submitted.

Metric 6.4.c. The company has a policy of non-reprisal against complainants, including human rights defenders, whistle-blowers, and community spokespersons.



Sub-indicator 6.4

Overview: A grievance and redress mechanism is an essential safeguard for individuals and communities that have been or could be adversely impacted by company actions. It provides an opportunity for them to voice their concerns and seek appropriate redress to remediate harm already suffered and/or prevent future harm. Grievance mechanisms promote transparency, accountability, and ethical business practices.

This sub-indicator assesses whether companies have in place a grievance and redress mechanism, in addition to an explicit policy of non-reprisal against complainants. It also assesses whether companies publicly disclose a list of all grievances received, including whether the grievance has been resolved.

Framework alignment:

This sub-indicator generally aligns with WBA's [Nature Benchmark](#) Core Social Indicator C12 and the TNFD [Recommended Disclosure](#) Governance C.



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