

Assessment of Corporate Climate Policy Engagement Disclosures: Methodology Document

Background

In 2021, InfluenceMap developed a methodology to assess the quality of corporate disclosures on climate policy engagement, benchmarked against expectations set out in investor statements by [PRI](#), [IIGCC](#), and [Ceres](#) (members of the CA100+ secretariat). This methodology was used in InfluenceMap's [April 2021 report](#) on this topic, and has been used extensively by companies and investors since 2021.

In 2022, InfluenceMap undertook a series of [pilot studies](#) integrating additional indicators from the [Global Standard on Responsible Climate Lobbying](#) ('the Global Standard') to these assessments. The Global Standard is the leading best practice framework for climate policy engagement disclosure, initiated by investors and launched in March 2022. The Global Standard sets out 14 indicators covering governance and oversight processes to ensure company alignment between their climate policy engagement and delivering the 1.5°C goal of the Paris Agreement, and clarifies exactly what investors expect from companies regarding disclosure.

In 2023, InfluenceMap's methodology to assess corporate disclosures on climate policy engagement was formally updated in line with the Global Standard and stakeholder input. These assessments are directly integrated into the [CA100+ Net Zero Company Benchmark](#) as part of the 'Climate Policy Engagement Alignment' assessment, under two distinct indicators:

- **Indicator 2, Accuracy of Climate Policy Engagement Disclosure:** An assessment of the accuracy and completeness of a company's reporting on its direct and indirect climate policy engagement activities.

Note: All CA100+ companies will be assessed under this methodology, irrespective of whether the company has published a formal disclosure and/or review of its climate policy engagement.

- **Indicator 3, Corporate Climate Policy Engagement Review:** An assessment of the quality and robustness of a company's process to identify, report on, and address specific cases of misalignment between its climate policy engagement (direct and indirect) and delivering the 1.5°C goal of the Paris Agreement.

*Note: The minimum criteria for a company to be assessed under this methodology is for the corporate disclosure to include a **review of alignment** of its direct and/or indirect climate policy engagement, either against the company's own chosen criteria or the 1.5°C goal of the Paris Agreement.*

There are three main changes included in this methodology update:

- **1.5°C Ambition:** The ambition of the language in the assessment criteria has been increased to explicitly reference the more ambitious 1.5°C ask of the Paris Agreement, in line with the Global Standard.
- **Accuracy of Climate Policy Engagement Disclosure:** This indicator was previously assessed under the 'Corporate Climate Policy Engagement Review' methodology. The accuracy and completeness of a company's reporting on its climate policy engagement activities is now assessed under a separate methodology, and a standalone indicator under the CA100+ Benchmark.
- **Direct Climate Policy Engagement Review:** 'Direct' climate policy engagement refers to advocacy undertaken directly by the company. 'Indirect' climate policy engagement refers to advocacy undertaken by the company's industry associations. In line with the Global Standard, additional criteria has been introduced to the 'Corporate Climate Policy Engagement Review' methodology to assess a company's processes to review both its direct and indirect climate policy engagement. This methodology previously only focused on the review of indirect climate policy engagement via industry associations.




Accuracy of Climate Policy Engagement Disclosure: Methodology

This is an assessment of the accuracy of a company's reporting on its direct and indirect (via industry associations) climate policy engagement activities.




InfluenceMap utilizes its proprietary database to assess how corporate disclosures on climate policy positions and engagement activities compare to InfluenceMap's independent assessment of the companies' and industry associations' real-world climate policy engagement. In short, it assesses the extent to which the company has disclosed on all climate policy engagement identified by InfluenceMap's database.

InfluenceMap's independent assessments of companies are based on a broad range of data sources including: company reporting, social media channels, CDP responses, regulatory consultation comments, reliable media reporting, statements from senior management, financial disclosures and investor communications.

This methodology assesses corporate performance against two indicators, using the traffic-light framework summarized below:

Key	Score Explanation
	Has broadly met the assessment criteria.
	Has partially met the assessment criteria.
	Has not met the assessment criteria.

Accuracy of Direct Climate Policy Engagement Disclosure: Has the company published an accurate account of its corporate climate policy positions and engagement activities (as compared to InfluenceMap's database)?

Accuracy of Direct Climate Policy Engagement Disclosure	
	The company has published an accurate account of its positions and engagement activities on specific climate policies*, or has excluded one item of material evidence** of direct climate policy engagement.
	The company has published a partial account of its positions and engagement activities on specific climate policies*, but excludes more than one item of material evidence** of direct climate policy engagement.
	The company has not published an account of its positions and engagement activities on specific climate-related policies, or the company's disclosure is limited to 'top-line' climate statements without reference to specific climate-related policies.
*As assessed against InfluenceMap's database on the company's climate policy engagement.	
**Material evidence in this context means consistent and/or strategic engagement on specific climate-related policies.	

Accuracy of Indirect Climate Policy Engagement Disclosure: Has the company published an accurate account of its corporate climate policy positions and engagement activities (as compared to InfluenceMap's database)?

Accuracy of Indirect Climate Policy Engagement Disclosure	
	The company has published an accurate account of their positions and engagement activities on specific climate policies for each industry association actively engaged on climate policy*, or has excluded one industry association which is actively engaged** on climate policy or one item of material evidence*** of indirect climate policy engagement.
	The company has published a partial account of its industry associations' positions and engagement activities on specific climate policies*. However, the company excludes more than one industry association(s) which is actively engaged on climate policy**, and/or excludes more than one material evidence of indirect climate policy engagement***.
	The company has not published an account of the positions and engagement activities of its industry associations on specific climate-related policies*, or the company's disclosure is limited to 'top-line' climate statements without reference to specific climate-related policies.
*As assessed against InfluenceMap's database of over 250 industry associations' climate policy engagement.	
** Industry associations are considered 'actively engaged' on climate policy if they have an Engagement Intensity score above 12% under InfluenceMap's database. The Engagement Intensity (expressed as a percentage from 0 to 100) is a measure of the level of direct policy engagement by the industry association, whether positive or negative.	
***Material evidence in this context means consistent and/or strategic engagement on specific climate-related policies.	

Corporate Climate Policy Engagement Review: Methodology Overview




InfluenceMap assesses corporate reviews of climate policy engagement against seven assessment criteria, benchmarked against standards put forward by investors under [the Global Standard on Responsible Climate Lobbying](#) and additional statements by [PRI](#), [IIGCC](#), and [Ceres](#).

The seven assessment criteria that make up the Review Score are split into three categories, outlined below along with the corresponding Global Standard indicator it is benchmarked against:

Review Process	Global Standard Indicator
(i) Monitor & Review: Has the company established an annual monitoring and review process to ensure that all of its direct and indirect climate policy engagement activities across all geographies are consistent with the goal of restricting global temperature rise to 1.5°C above pre-industrial levels?	Indicator 9
(ii) Alignment assessment method: Has the company disclosed a clear and detailed methodology for assessing alignment, including: (1) the criteria it uses to assess whether the climate policy engagement activities of its industry associations align with the goal of restricting global temperature rise to 1.5°C above pre-industrial levels; and (2) a clear and detailed explanation behind the assessment of each industry association?	Indicator 8
(iii) Framework for addressing misalignment: Has the company established a clear framework for addressing misalignments between the climate policy engagement activities of its industry associations and the goal of restricting global temperature rise to 1.5°C above pre-industrial levels, including the escalation strategies it will use and when it will use these escalation strategies?	Indicator 8
Review Assessment (Direct - Company)	Global Standard Indicator
(i) Identify & Assess (Direct Misalignment): Has the company identified and reported on the existence of all misalignments between its direct climate policy engagement activities and the goal of restricting global temperature rise to 1.5°C above pre-industrial levels, in line with InfluenceMap's database (including all of its subsidiaries, business areas, and operational jurisdictions)?	Indicator 10
(ii) Act (Direct Misalignment): Has the company reported on what action is being (or has been) taken to address misalignments, if and where they exist, between its direct climate policy engagement activities and the goal of restricting global temperature rise to 1.5°C above pre-industrial levels, in line with InfluenceMap's database?	Indicator 10
Review Assessment (Indirect - Industry Associations)	Global Standard Indicator
(i) Identify & Assess (Indirect Misalignment): Has the company identified and reported on the existence of all misalignments between the climate policy engagement activities of its industry associations, and the goal of restricting global temperature rise to 1.5°C above pre-industrial levels, in line with InfluenceMap's database?	Indicator 10
(ii) Act (Indirect Misalignment): Has the company reported on what action is being (or has been) taken to address misalignments, if and where they exist, between the climate policy engagement activities of its industry associations, and the goal of restricting global temperature rise to 1.5°C above pre-industrial levels, in line with InfluenceMap's database?	Indicator 10

Corporate Climate Policy Engagement Review: Assessment Criteria


The final 'Review Score' assesses corporate performance against seven indicators, using the traffic-light framework summarized below. A 'Green' scores 2 points, a 'Yellow' scores 1 point, and a 'Red' scores 0 points. This total is converted into a percentage from 0 to 100, calculated using the total number of points available (14).

Key	Score Explanation
	Has broadly met the assessment criteria.
	Has partially met the assessment criteria, but with some deficiencies.
	Has not met the assessment criteria.

The detailed assessment criteria for the seven indicators is outlined below:

1. Review Process

- (i) **Monitor & Review:** Has the company established an annual monitoring and review process to ensure that all of its direct and indirect climate policy engagement activities across all geographies are consistent with the science-aligned policy pathways for restricting global temperature rise to 1.5°C above pre-industrial levels?

Monitor & Review	
	The company has published a review of its climate policy engagement on an annual basis or has committed to do so at least once a year. Alternatively, the company is/has committed to disclose regular updates on its review process including detailed updates on relevant misalignments (e.g. engagement with industry associations on climate policy engagement, specific actions taken, changes in positions, and next steps).
	The company has committed to publish an update to its climate policy engagement review process, but not explicitly on an annual basis.
	The company has not committed to any follow-up processes as part of its climate policy engagement review process.

- (ii) **Alignment assessment method:** Has the company disclosed a clear and detailed methodology for assessing alignment, including: (1) the criteria it uses to assess whether its climate policy engagement activities (direct or indirect) align with science-aligned policy pathways for restricting global temperature rise to 1.5°C above pre-industrial levels; and (2) a clear and detailed explanation behind each evaluation?

Alignment Assessment Method	
	The company has: (1) disclosed a clear and detailed methodology for assessing alignment, including the criteria for a finding of alignment and misalignment; (2) aligned this assessment methodology with delivering the 1.5°C goal of the Paris Agreement; and (3) provided a clear and detailed explanation behind each evaluation.
	The company has disclosed a methodology for assessing alignment, but the disclosure does not satisfy <i>one or two</i> of the above criteria (1-3).
	The company has not disclosed a methodology for assessing alignment, or it has disclosed a methodology but the disclosure does not satisfy any of the above criteria (1-3).

- (iii) **Framework for addressing misalignment:** Has the company established a clear framework to address misalignments between its climate policy engagement activities (direct or indirect), and science-aligned policy pathways for restricting global temperature rise to 1.5°C above pre-industrial levels including the escalation strategies it will use and when it will use these escalation strategies?

Framework for Addressing Misalignment	
	The company has disclosed a clear framework to address misalignments, including details on: (1) the escalation strategies it will use; and (2) when it will use them. Escalation strategies may include, but are not limited to: making public statements challenging industry associations, withdrawing funding for the industry association, and suspending or ending membership of the industry association.
	The company has disclosed a clear framework to address misalignments, but the disclosure does not satisfy <i>one</i> of the above criteria (1-2).
	The company has not disclosed a framework for addressing misalignments with its industry associations, or the company has disclosed a framework but the disclosure does not satisfy <i>both</i> of the above criteria (1-2).

2. Review Assessment (Direct – Company)

- (i) **Identify & Assess (Direct Misalignment):** Has the company identified and reported on the existence of all misalignments between its direct climate policy engagement activities and science-aligned policy pathways for restricting global temperature rise to 1.5°C above pre-industrial levels, in line with InfluenceMap's database (including all of its subsidiaries, business areas, and operational jurisdictions)?

Identify & Assess (Direct Misalignment)	
	<p>The company has reviewed and identified all cases of misalignment between its direct climate policy engagement and delivering the 1.5°C goal of the Paris Agreement*, or the company has no material evidence** of negative climate policy engagement identified by InfluenceMap's database.</p> <p>OR the company has an Organization Score metric of 75% or above (indicating alignment with science-aligned pathways for limiting warming to 1.5°C), has reviewed its own direct climate policy engagements, and missed <i>up to one</i> instance of material evidence** of negative climate policy engagement identified by InfluenceMap's database.</p>
	<p>The company has conducted a review of its direct climate policy engagements, but has not identified key cases of misalignment between its direct climate policy engagement and delivering the 1.5°C goal of the Paris Agreement*. Companies are scored in this category if they have not identified <i>up to three</i> instances of material evidence** of negative climate policy engagement that is misaligned with delivering the 1.5°C goal of the Paris Agreement.</p>
	<p>The company has not conducted a review of its direct climate policy engagements, OR the company has conducted a review, but has not identified key cases of misalignment between its direct climate policy engagement and delivering the 1.5°C goal of the Paris Agreement*. Companies are scored in this category if they have not identified <i>more than three</i> instances of material evidence** of negative climate policy engagement that is misaligned with delivering the 1.5°C goal of the Paris Agreement.</p>
*As assessed against InfluenceMap's database on the company's climate policy engagement.	
**Material evidence in this context means consistent and/or strategic engagement on specific climate-related policies.	

- (ii) **Act (Direct Misalignment):** Has the company reported on what action is being (or has been) taken to address misalignments, if and where they exist, between its direct climate policy engagement activities and science-aligned policy pathways for restricting global temperature rise to 1.5°C above pre-industrial levels, in line with InfluenceMap's database?

Act (Direct Misalignment)	
	<p>The company has shown evidence of action to address all cases of misalignment between its direct climate policy engagement and delivering the 1.5°C goal of the Paris Agreement*, or the company has no material evidence** of negative climate policy engagement identified by InfluenceMap's database.</p>
	<p>The company has shown some evidence of action to address cases of misalignment between its direct climate policy engagement and delivering the 1.5°C goal of the Paris Agreement*, but has not addressed key cases of misalignment identified by InfluenceMap's database.</p>
	<p>The company has shown no evidence of action to address cases of misalignment between its direct climate policy engagement and delivering the 1.5°C goal of the Paris Agreement*.</p>
*As assessed against InfluenceMap's database of the company's climate policy engagement.	
**Material evidence in this context means consistent and/or strategic engagement on specific climate-related policies.	

3. Review Assessment (Indirect – Industry Associations)

- (i) **Identify & Assess (Indirect Misalignment):** Has the company identified and reported on the existence of all misalignments between the climate policy engagement activities of its industry associations, science-aligned policy pathways for restricting global temperature rise to 1.5°C above pre-industrial levels, in line with InfluenceMap's database?

Identify & Assess (Indirect Misalignment)	
	The company has identified all cases of misalignment between its industry associations and delivering the 1.5°C goal of the Paris Agreement*, or the company does not have any memberships to industry associations with misaligned or partially misaligned climate policy engagement practices in InfluenceMap's database (Organization Scores of 0-74).
	The company has not identified key cases of misalignment between its industry associations and delivering the 1.5°C goal of the Paris Agreement*. Companies are scored in this category if they miss up to three cases of partial misalignment (industry associations with Organization Scores 50-74 in InfluenceMap's database).
	The company has not identified key cases of misalignment between its industry associations and delivering the 1.5°C goal of the Paris Agreement*. Companies are scored in this category if they miss one case of misalignment (industry associations with Organization Scores below 50 in InfluenceMap's database) or more than three cases of partial misalignment (industry associations with Organization Scores 50-74 in InfluenceMap's database).
*As assessed against InfluenceMap's database of over 250 industry associations' climate policy engagement.	

- (ii) **Act (Indirect Misalignment):** Has the company reported on what action is being (or has been) taken to address misalignments, if and where they exist, between the climate policy engagement activities of its industry associations, and science-aligned policy pathways for restricting global temperature rise to 1.5°C above pre-industrial levels, in line with InfluenceMap's database?

Act (Indirect Misalignment)	
	The company has shown evidence of action to address all cases of misalignment between its industry associations and delivering the 1.5°C goal of the Paris Agreement, or the company does not have any memberships to misaligned or partially misaligned industry associations (i.e. Organization Scores of 0-74 in InfluenceMap's database)*.
	The company has shown some evidence of action to address cases of misalignment between its industry associations and delivering the 1.5°C goal of the Paris Agreement, but has not addressed key cases of misalignment or partial misalignment with its industry associations (i.e. Organization Scores of 0-74 in InfluenceMap's database)*.

The company has shown no or limited evidence of action to address misalignment between its industry associations and delivering the 1.5°C goal of the Paris Agreement, missing key cases of misalignment or partial misalignment with its industry associations (i.e. Organization Scores of 0-74 in InfluenceMap's database)*.

*As assessed against InfluenceMap's [database](#) of over 250 industry associations' climate policy engagement.

The [Global Standard on Responsible Climate Lobbying](#) discloses actions companies can take to address misalignment: making public statements challenging industry associations, withdrawal of funding, and suspending or terminating membership. Investor statements by [PRI](#), [IIGCC](#) and [Ceres](#) outline additional actions including: constructive engagement, requiring the industry association to stop engaging on issues where there is not alignment amongst all members, and forming proactive coalitions to counter negative advocacy.