

HeidelbergCement

Detailed assessment of HeidelbergCement’s corporate climate policy engagement review

This document outlines a detailed breakdown of InfluenceMap's assessment of the company's corporate disclosure climate policy engagement. Further detail on the assessment methodology is available in the Appendix, and on InfluenceMap’s CA100+ Investor Hub [here](#).

A summary of HeidelbergCement’s disclosures on industry associations is shown below. HeidelbergCement has undertaken two reviews of its industry associations to date. The Review Score represents InfluenceMap’s overall assessment of the quality of the company’s industry association review process, where 100 would indicate that a company has met investor expectations for all criteria related to the review process.

Date of Review	Review Score
April 2021	43 / 100
December 2022	50 / 100

This assessment focuses solely on HeidelbergCement’s disclosure on climate policy engagement, which can be found [here](#). This assessment does not include an analysis of the company's direct climate policy engagement, which can be found on InfluenceMap's online profile of HeidelbergCement [here](#). The table below provides a breakdown of Toyota’s performance against each of the seven assessment criteria, using the traffic-light assessment framework summarized below.

Key	Explanation
	Has broadly met investor expectations in this area.
	Has made some progress on investor expectations in this area, but with significant deficiencies.
	Has fallen short of investor expectations in this area.

Disclosure & Transparency	Policy Alignment Process
Corporate climate positions	Identify & Assess
Industry group climate positions	Monitor & Review
Alignment assessment method	Act
Framework for misalignment	

HeidelbergCement’s Company Scorecard

The tables below highlight, for each indicator, the criteria for companies to meet investor expectations, HeidelbergCement’s assessment, and examples of better practice by companies to date.

While InfluenceMap did not find an example of best practice across the entire industry association review process, some companies have demonstrated better practice under specific metrics under the 'Disclosure & Transparency' and 'Policy Alignment Process' assessments.

Disclosure & Transparency

Corporate climate policy positions and influencing activities

To meet investor expectations under this indicator: The company has to disclose a detailed and clearly referenced breakdown of its own climate policy positions and influencing activities beyond ‘top-line’ climate statements. This includes descriptions of the company’s positions and policy engagement activities on specific items of regulation and legislation which are material to the company’s operations, business sector, and/or the region(s) in which it operates.

<p>HeidelbergCement</p>	<p>In its 2022 review, HeidelbergCement mostly limited its disclosure on its climate policy positions to top-line statements on the Paris Agreement and the broader implementation of climate policy, without reference to specific items of climate-related regulation and legislation. The company provided a link to its corporate policy positions, which were also limited to top-line positions. However, HeidelbergCement also provided a link to its EU Transparency Register webpage, which discloses the company’s response to EU consultations on climate-related legislation including Carbon Removal Certification, and the Revision of the Emissions Trading System State Aid Guidelines.</p> <p>Despite this, HeidelbergCement has omitted key instances of negative climate policy engagement. For example, in June 2022 comments on an EU consultation, the company was <i>unsupportive</i> of provisions in the EU Renewable Energy Directive (RED II). The company was unsupportive of emissions from non-renewable sources being considered as avoided emissions only until 2035 – this position would weaken the overall climate ambition of RED II as proposed by the EU Commission. In a July 2021 earnings call, HeidelbergCement was also <i>unsupportive</i> of phasing out free emission allowances before the EU Carbon Border Adjustment Mechanism (CBAM) was in place, which would weaken the overall climate ambition of the EU CBAM and would hinder an ambitious reform of the EU Emissions Trading System (EU ETS).</p>
<p>Best Practice</p>	<p><i>Shell</i> has disclosed case studies of its direct climate policy engagement in the EU and US. These case studies include Shell's positions on, and engagement with, specific items of EU and US regulation and legislation. The 2022 review also includes clear references to additional resources on Shell's corporate website, including advocacy updates on specific government policy consultations and links to public submissions via the EU Transparency Register and the US Lobbying Disclosure Act.</p>

Industry association climate policy positions and influencing activities

To meet investor expectations under this indicator: The company has to disclose a detailed and accurate account of the climate policy positions and influencing activities of each industry association actively engaged on climate change policy, including descriptions of positions and policy engagement activities on specific items of regulation and legislation beyond ‘top-line’ statements.

HeidelbergCement	<p>HeidelbergCement has limited its disclosure on its industry associations’ climate policy positions to top-line statements on the Paris Agreement, carbon pricing, and the energy mix without reference to specific items of regulation and legislation. The company also appears to overlook detailed examples of negative climate lobbying by key industry associations, such as Verband der Chemischen Industrie (VCI) and Federation of German Industries (BDI). See Identify & Assess for further details of VCI’s and BDI’s climate policy engagement.</p>
Best Practice	<p>No companies have met investor expectations in this area, although <i>BASF</i> and <i>Shell</i> exhibit current leading practice. Both companies have disclosed a detailed account of all key industry associations’ climate policy positions, and a summary of their influencing activities. However, they appear to overlook detailed negative lobbying by a number of industry associations identified by InfluenceMap’s database.</p>

Alignment assessment method

To meet investor expectations under this indicator: The company has to: (1) disclose a clear and detailed framework for assessing alignment with its industry associations across all relevant areas of policy engagement; (2) consistently apply this framework across *all* industry associations; and (3) provide a clear and detailed explanation behind each evaluation.

HeidelbergCement	<p>HeidelbergCement has disclosed a clear and detailed framework for assessing alignment. The company assessed its industry associations against six criteria, including: support for the Paris Agreement; publishing a Paris-aligned carbon dioxide roadmap; advocate for carbon pricing; advocate for advanced technologies; advocate for low-carbon products; and advocate for renewable energies.</p> <p>The company also disclosed criteria for associations to be assessed as ‘Fully Aligned’, ‘Partially misaligned’, or ‘Misaligned’, and provided a clear and detailed explanation behind each evaluation.</p>
Best Practice	<p><i>BASF</i> has also disclosed a clear explanation of its alignment assessment method along with a clear and detailed explanation of how it has been applied to each industry association. The company also provided specific alignment indicators for EU climate policy such as the EU ETS to assess the alignment of key European industry associations.</p>

Framework for addressing misalignment

To meet investor expectations under this indicator: The company must disclose a clear and detailed framework for addressing misalignments with its industry associations including escalation steps and clear deadlines for industry associations which do not amend misaligned practices.

<p>HeidelbergCement</p>	<p>HeidelbergCement has disclosed a clear framework to address misalignment with its industry associations, including escalating steps. The company stated that if it finds misalignment with an industry association, it will increase its engagement with association committees and signal its dissent to improve alignment. HeidelbergCement also states that if misalignment persists, the company will make its disagreement public, assess the association’s performance and membership value, and review if exiting the association is appropriate.</p> <p>HeidelbergCement did not, however, include clear deadlines for associations which do not amend misaligned practices.</p>
<p>Best Practice</p>	<p><i>BHP</i> has disclosed clear and detailed steps for addressing potential misalignment, including an escalation strategy and clear timelines attached. The company states it will communicate material differences, request that the industry association develop a position or refrain from advocacy in certain areas, and review the membership if there has been no action within 12 months.</p>

Policy Alignment Process

Identify & Assess	
<p>To meet investor expectations under this indicator: The company has to identify all cases of misalignment with its industry associations and the Paris Agreement in line with InfluenceMap’s <i>database</i> on corporate lobbying.</p>	
<p>HeidelbergCement</p>	<p>HeidelbergCement assessed 22 associations in its review, and found 13 to be Fully Aligned, 7 Partially Misaligned, and 2 Misaligned.</p> <p>The company found Stowarzyszenie Producentów Cementu (SPC), Czech Cement Association, Romanian Association of Cement Industry & Other Mineral Products (CIROM), Cement Manufacturers Association (CMA) India, Cement Concrete & Aggregates Australia, Association Professionelles Cimentier, and The Cement Division to be Partially Misaligned. The company found Asosiasi Semen Indonesia and the Chamber of Cement Manufacturers Ghana (COCMAG) to be misaligned. None of these industry associations are currently covered by InfluenceMap’s database.</p> <p>InfluenceMap analysis indicates that HeidelbergCement has at least three memberships to industry associations misaligned with the Paris Agreement (<i>Federation of German Industries (BDI)</i>, <i>Confederación Española de Organizaciones Empresariales (CEOE)</i>, <i>Verband der Chemischen Industrie (VCI)</i>) and at least two memberships to industry associations potentially misaligned with the Paris Agreement (<i>CEMBUREAU</i>, <i>Business Council of Australia</i>). HeidelbergCement found CEMBUREAU to be Aligned. The other four associations were not included in the review.</p> <p>InfluenceMap analysis finds that HeidelbergCement’s industry associations have engaged negatively on climate-related policies, for example:</p> <ul style="list-style-type: none"> ■ <i>Verband der Chemischen Industrie (VCI)</i>: In December 2022, VCI was <i>unsupportive</i> of the EU Carbon Border Adjustment Mechanism, stating that it is not suitable for the chemicals sector. VCI was also <i>unsupportive</i> of <i>revisions</i> to the EU Emissions Trading System in November 2022, stating that the proposed restrictions around free allowances are an “unnecessary double burden”. ■ <i>Federation of German Industries (BDI)</i>: In December 2022, BDI <i>advocated</i> for decreased ambition in EU climate policy and avoiding ‘unnecessary revisions’ to ensure that companies have fewer regulations to comply with. Also in December 2022, BDI <i>supported</i> the development of hydrogen infrastructure but stressed that standards for green hydrogen production should not be too high. ■ <i>Confederación Española de Organizaciones Empresariales (CEOE)</i>: In a May 2022 website publication, CEOE called for free allocation of emissions allowances under the EU <i>Carbon Border Adjustment Mechanism</i> and the <i>EU ETS</i>.
<p>Best Practice</p>	<p><i>Enel</i> is the only company to meet investor expectations in this area, identifying all cases of misalignment with its industry associations and the Paris Agreement in line with InfluenceMap’s database, although the company does not disclose additional details of why they are not fully aligned. InfluenceMap analysis indicates that most companies have missed key cases of misalignment with industry associations lobbying counter to the goals of the Paris Agreement.</p>




Monitor & Review	
<p>To meet investor expectations under this indicator: The company has to publish a review of industry associations on an annual basis, commit to do so at least once a year, or commit to disclose regular updates on its review and alignment process. Updates should accurately report on relevant material and on-going lobbying activities of potentially misaligned industry associations, as well as the company’s alignment and engagement with the industry association concerning these activities.</p>	
HeidelbergCement	<p>HeidelbergCement has published annual assessments of its industry associations in 2021 and 2022.</p>
Best Practice	<p><i>Shell</i> publishes detailed assessments of its industry association memberships at two-year intervals, with detailed updates on misaligned industry associations each year. Shell has published two full reviews of its industry associations (2019, 2021) and two review updates (2020, 2022). The review updates include actions taken within each industry association, key changes to the associations’ climate positions, and detailed next steps. Shell has committed to publish its next update in 2023.</p>

Act	
<p>To meet investor expectations under this indicator: The company has to show evidence of action to address all cases of misalignment with its industry associations and the Paris Agreement, in line with InfluenceMap’s <i>database</i> on corporate lobbying. The investor expectations outlined by <i>PRI</i>, <i>IIGCC</i> and <i>Ceres</i> include several steps companies can take to address misalignment. Steps should include terminating memberships or taking specific action to reform the detailed and material lobbying activities undertaken by misaligned organizations.</p>	
HeidelbergCement	<p>HeidelbergCement stated in its review that “Several actions have been taken in 2022 due to previous misalignment of those associations with the goals of the Paris Agreement.” The company detailed some of its own ongoing engagements with its associations. For example, it stated that it encouraged the Global Cement and Concrete Association (GCCA) to roll out its Net Zero Accelerator Programme in Thailand, Egypt, Morocco, and India. However, the company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap’s database (see Identify & Assess).</p>
Best Practice	<p>No companies have met investor expectations in this area by showing evidence of action to address all cases of misalignment identified by InfluenceMap’s database, although some companies have made more progress. <i>Total</i> announced in January 2021 that it had decided not to renew its membership to the American Petroleum Institute due to divergences on climate positions. <i>BHP</i> suspended its membership to Queensland Resources Council in 2020 following its ‘Vote Greens Last’ advertising campaign and outlined detailed actions to be taken at four "partly aligned" industry associations. <i>Chevron</i> has not left any industry associations but has disclosed its engagement on specific climate change policy issues with seven industry associations, including details of the results of this engagement. Similarly, <i>General Motors</i> has disclosed that it has not financially contributed to advocacy campaigns against the Build Back Better Act by the Business Roundtable and US Chamber, and has publicly advocated a supportive position to ensure its stance is differentiated from them.</p>

Appendix: InfluenceMap’s Methodology for Assessing Corporate Climate Policy Engagement Disclosures

Scoring Disclosures and Policy Alignment Process



InfluenceMap assesses corporate performance against seven assessment criteria, 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). As such, only certain scores within the 0 to 100 range are possible under this methodology.

Key	Score Explanation
	Has broadly met investor expectations in this area.
	Has made some progress on investor expectations in this area, but with significant deficiencies.
	Has fallen short of investor expectations in this area.

Assessing Disclosures

Since BHP’s 2017 industry association review, around 60 major global corporates have delivered similar, specific disclosures on their industry association links in response to investor pressure. This positive momentum is undermined, however, if the resulting disclosures are of poor quality.

In its *‘Investor Expectations on Corporate Climate Lobbying’* report, the PRI highlights the need for disclosure on the company’s positions and activities on climate change policy engagement, as well as the positions and activities of the industry groups it supports. The PRI further requests information on the governance processes and actions taken to ensure alignment between these activities and the company’s stated climate goals. *IIGCC* and *Ceres* articulate similar expectations, also requiring companies to disclose a material impact assessment of lobbying by an organization that opposes their public position. InfluenceMap uses the following assessment criteria to test the clarity, accuracy and scope of information provided by companies against four key issues.

Disclosure Item	Score	InfluenceMap’s Assessment Criteria
Corporate climate policy positions and influencing activities		The company has disclosed a detailed and clearly referenced breakdown of its own climate policy positions and influencing activities beyond ‘top-line’ climate statements. This includes descriptions of the company’s positions and policy engagement activities on specific items of regulation and legislation which are material to the company’s operations, business sector, and/or the region(s) in which it operates.
		The company has disclosed a breakdown of its own climate policy positions and influencing activities. However, the company’s description of its positions and policy engagement activities on specific items of regulation and legislation lacks detail, and/or the company has not disclosed its position and engagement activities on key items of

		regulation and legislation which are material to its operations, business sector, and/or the region(s) in which it operates.
		The company has made no attempt to disclose its climate policy positions and influencing activities, or the company's disclosure is limited to a brief overview of its 'top-line' climate statements and operational commitments without reference to specific items of regulation and legislation.
Industry association climate policy positions and influencing activities		The company has disclosed a detailed and accurate account of the climate policy positions and influencing activities of each industry association actively engaged on climate change policy, including descriptions of positions and policy engagement activities on specific items of regulation and legislation beyond 'top-line' statements.
		The company has disclosed an account of the climate policy positions and influencing activities of each industry association actively engaged on climate change policy, beyond 'top-line' statements. However, the disclosure lacks detail on positions and policy engagement activities on specific items of regulation and legislation, and/or does not disclose evidence of negative climate lobbying by one or more of its industry associations.
		The company has not disclosed the climate policy positions and influencing activities of each industry association actively engaged on climate change policy, and/or the company's disclosure is limited to a brief overview of 'top-line' climate statements without reference to specific items of regulation and legislation.
Alignment assessment method		The company has: (1) disclosed a clear and detailed framework for assessing alignment with its industry associations across all relevant areas of policy engagement; (2) consistently applied this framework across <i>all</i> industry associations; and (3) provided a clear and detailed explanation behind each evaluation.
		The company has disclosed a framework for assessing alignment with its industry associations but the disclosure lacks detail regarding <i>one</i> of the above steps (1-3).
		The company has not disclosed a framework for assessing alignment with industry associations, or it has disclosed a framework but the disclosure lacks detail regarding <i>more than one</i> of the above steps (1-3).
Framework for addressing misalignment		The company has disclosed a clear and detailed framework for addressing misalignments with its industry associations including escalation steps and clear deadlines for industry associations which do not amend misaligned practices.
		The company has disclosed a clear and detailed framework for addressing misalignments with its industry associations including escalation steps, but there is no clear deadlines for industry associations which do not amend misaligned practices
		The company has not disclosed a framework for addressing misalignments with its industry associations, or the company has disclosed a framework but the steps are ambiguous and lack sufficient detail.

Assessing Policy Alignment Process

As well as transparent disclosures on industry group links and lobbying activities, the investor expectations communicated by IIGCC, CERES and the UN PRI also set out the need for robust processes to ensure alignment between the company's stated policy positions and the positions and lobbying activities of their industry groups. These processes consist of the following three elements:

Alignment Process	Score	InfluenceMap's Assessment Criteria
Identify & Assess	Green	The company has identified all cases of misalignment with its industry associations and the Paris Agreement in line with InfluenceMap's <i>database</i> on corporate lobbying.
	Yellow	The company has not identified key cases of misalignment with the Paris Agreement in line with InfluenceMap's <i>database</i> on corporate lobbying. Companies are scored in this category if they miss up to three cases of "potential" misalignment (industry associations with Organization Scores 51-75 in InfluenceMap's database).
	Red	The company has not identified key cases of misalignment with the Paris Agreement in line with InfluenceMap's <i>database</i> on corporate lobbying. Companies are scored in this category if they miss one case of misalignment (industry associations with Organization Scores 0-50) or more than three cases of "potential" misalignment (industry associations with Organization Scores 51-75 in InfluenceMap's database).
Monitor & Review	Green	The company has published a review of industry associations on an annual basis, has committed to do so at least once a year, or is/has committed to disclose regular updates on its review and alignment process. Updates should accurately report on relevant material and on-going lobbying activities of potentially misaligned industry associations, as well as the company's alignment and engagement with the industry association concerning these activities.
	Yellow	The company has committed to publish an update to its review of industry associations but not an annual basis or not specified a timeframe.
	Red	The company has not committed to any follow-up processes as part of its review of industry associations.
Act	Green	The company has shown evidence of action to address all cases of misalignment with its industry associations and the Paris Agreement, in line with InfluenceMap's <i>database</i> on corporate lobbying. The investor expectations outlined by <i>PRI</i> , <i>IIGCC</i> and <i>Ceres</i> include several steps companies can take to address misalignment. Steps should include terminating memberships or taking specific action to reform the detailed and material lobbying activities undertaken by misaligned organizations.
	Yellow	The company has shown some evidence of action to address cases of misalignment with its industry associations and the Paris Agreement, but has not addressed key cases of misalignment or "potential" misalignment identified by InfluenceMap's <i>database</i> on corporate lobbying, i.e. industry associations with Organization Scores 0-75 in InfluenceMap's database. The investor expectations outlined by <i>PRI</i> , <i>IIGCC</i> and <i>Ceres</i> include several steps companies can take to address misalignment. Steps should include terminating memberships or taking specific action to reform the detailed and material lobbying activities undertaken by misaligned organizations.
	Red	The company has shown no or limited evidence of action to address cases of misalignment with its industry associations and the Paris Agreement, missing key cases of misalignment or potential misalignment identified in InfluenceMap's <i>database</i> on corporate lobbying, i.e. industry associations with Organization Scores 0-75. The investor expectations outlined by <i>PRI</i> , <i>IIGCC</i> and <i>Ceres</i> include several steps companies can take to address misalignment. Action will be scored under this category if it does not include terminating memberships or taking specific action to reform the detailed and material lobbying activities undertaken by misaligned organizations.

To assist this assessment, InfluenceMap will be applying its database on corporate and industry group climate change lobbying. This tracks in real-time the detailed climate policy lobbying of around 400 companies and 200 industry associations globally, allowing like-for-like comparisons of organizations' positions on climate policy that are compared to a benchmark of Paris-aligned climate policy. This system can track the evolution of corporate and industry group climate lobbying positions over time.