

ESG Data and Ratings Working Group – Minutes for Meeting 6 on 18 May 2023

1. Opening of Meeting

The Steering Committee (M&G, Moody's ESG Solutions, LSEG and Slaughter & May) welcomed members and outlined the agenda and the Secretariat provided an update on the project plan noting that the drafting of the Code must be completed within the next month.

2. Recent engagement

The Steering Committee provided an update on recent meetings with FRC and FCA. These meetings were focused on their experience with Code ownership and discussed the importance of communication to ensure the Code is successful. The Steering Committee informed members that options for Code ownership are currently being explored.

The Steering Committee also met with ISS and TPI, who provided an overview of their current practices and methodologies, with a particular focus on transparency and engagement with rated entities.

3. Application and approach

Members discussed draft text on the application and approach of the Code. It was decided that the Code was to move towards a compliance option where signatories provide a qualitative description of what they are committing to implement if they sign up to the Code. Members agreed with the proposed approach.

4. Terminology

Members discussed the latest drafting of the definitions and the intention to align with the language used in the IOSCO report. It was noted that the definitions are not intended for regulation; since it is a voluntary Code, definitions allow broad application and market participants should decide whether a particular definition applies to them.

The Codes current definitions are almost in line with IOSCO and no substantial changes were made. Members were reminded that they will have an opportunity to receive market feedback during the consultation process.

5. Scope text

Members discussed draft text on the "Target scope and application" section of the Code. This section provides a general overview and communicates a broad sense of application; noting the voluntary nature of the Code the scope and application needs to be clear and flexible.

Members discussed the risks and benefits of including controversies reports and SPOs in scope. It was concluded that the Code is relevant to controversies products and SPOs.

6. Conclusion and next steps

The Steering Committee thanked S&P for hosting the meeting. The next plenary meeting is scheduled for 15 June and will be hosted by Bloomberg. The Secretariat will circulate post-meeting material.

Attendance List

Steering Committee

- Angela Brown, Global Head of Products, **Moody's ESG Solutions**
- Rob Marshall, Head of Sustainable Investing **M&G**
- Nick Bonsall, Partner Financial Regulation Group, **Slaughter and May**

Members

- Oliver Moullin, MD, Sustainable Finance - **AFME**
- Robert Greenberg, Head of Sustainability Integration - Governance & Performance - **Anglo-American**
- Stéphane Janin, Head of Global Regulatory Developments and Public Affairs - **AXA IM**
- Andreas Giannopoulos, Director, Sustainability & ESG - **Barclays**
- Priti Ravi, Director, Sustainable Investing - **BlackRock (virtual)**
- Christopher Rich, General Counsel - **Financial Markets Standards Board (FMSB) (virtual)**
- Carol Thomas, Head of Sustainability and Responsible Investment - **The IA**
- Mike Wilkins, Executive Director & Professor of Practice, Centre for Climate Finance and Investment - **Imperial College**
- David Scalzetti, Senior Director of Regulatory Products - **Intercontinental Exchange (ICE) (virtual)**
- Neil Acres, Global Head of Regulatory and Government Affairs - **MSCI**
- Sindhu Krishna, Head of Sustainable Investments – **Phoenix Group**
- Nicole Streuli, EVP Operations & Research - **RepRisk**
- Arthur Carabia, Director ESG Policy Research - **Sustainalytics**
- Kushal Shah, Assistant VP, ESG Investment Strategy - **State Street Global Advisors**
- David Doyle, Head of Government Affairs and Public Policy - **S&P Global**
- Rene Van Merrienboer, Director of Sustainable Markets - **UN PRI**

Observers (*all virtual except FCA*)

- Caspar Siebert, Harriet Richards - **Bank of England**
- Sara Woodroffe (*virtual*), Dunvel Delias - **FCA**
- Basia Armstrong - **HMT**
- Raluca Tircoci, Jo-Anne Matear – **IOSCO**
- Asaf Barouk, Emily Albertson - **SEC**
- Theresa Jiang, Annabel Lim – **MAS**

Secretariat

- Simone Utermarck, Stanislav Egorov, Nicholas Pfaff (*virtual*) – **ICMA**
- Kirstin Mathews, Corinna Williams, Madison McSweeney (*virtual*) – **IRSG**

Additional support

- Lucy Scaramuzza - **Slaughter and May**