



RESPONSIBLE POLICY ENGAGEMENT:

Corporate Climate Policy Engagement Reporting Template

February 2025

WE MEAN
BUSINESS
COALITION 

About the We Mean Business Coalition:

The We Mean Business Coalition is a group of nonprofit organizations working with the world's most influential businesses to take action on climate change. The global coalition brings together seven organizations: BSR, CDP, Ceres, The B Team, The Climate Group, CLG Europe and the World Business Council for Sustainable Development. Together we catalyze business action to drive policy ambition and accelerate the transition to a zero-carbon economy.

Find out more at wemeanbusinesscoalition.org

About the RPE Framework

We Mean Business Coalition developed the Responsible Policy Engagement (RPE) Framework in 2023 to help more companies reap the benefits of RPE. Created with input from partners and leading companies, the Framework brings together tools, guides and best practice. Since its launch, the Coalition has built on the Framework by identifying improvements in internal and external processes that will enable companies to be more consistent in how they practice and disclose their advocacy.

Find out more at: wemeanbusinesscoalition.org/RPE

We would like to thank the RPE Taskforce members who supported the creation of the *Corporate Climate Policy Engagement Reporting Template* for their time, effort and their work in the corporate climate advocacy space. The RPE Taskforce members are BSR, CDP, Ceres, The B Team, The Climate Group, CLG Europe, World Business Council for Sustainable Development, High Level Champions, InfluenceMap and the Science Based Target Initiative.

INTRODUCTION

Responsible businesses know that cutting emissions and transitioning to clean energy builds resilience across their operations and supply chains. To meet their goals faster, companies need an enabling policy and regulatory environment. Responsible Policy Engagement (RPE) describes how companies advocate for public policies that support achievement of their climate and sustainability targets, the internal processes that align corporate functions to do so, and how companies disclose their advocacy to build trust and accountability.

This template is designed to support companies in their RPE disclosure by guiding them through the process of drafting a corporate climate policy engagement report. These reports are produced by companies to provide transparency to stakeholders including NGOs and investors. They cover direct advocacy to policymakers and indirect advocacy by trade groups in relation to science-aligned climate policy pathways, and the overall governance and methodologies in place to ensure their advocacy supports corporate strategy.

What is Science-Aligned Climate Policy?

The term science-aligned climate policy defines policy pathways that are aligned with the global scientific consensus on what is required to deliver the Paris Agreement's target of limiting global temperature rise to as close to 1.5°C as possible.

The UN's Intergovernmental Panel on Climate Change, which synthesizes the latest scientific research and identifies areas of agreement across a range of climate-related policy topics, can be considered the definitive resource for science-aligned climate policy.

[InfluenceMap's Science-Based Benchmarks](#) provide summaries of this analysis on key policy issues which can be used in corporate climate policy engagement reviews, supplemented with other resources such as the [2021 IEA's Net Zero Roadmap](#) and [2023 update](#).

To develop the template, the Coalition consulted with companies and investors over the summer and autumn of 2024, analyzed the reports already published by companies, and engaged with InfluenceMap on the methodology it uses in benchmarking reports. Based on this research, it is clear that there is significant room for improvement in how companies approach climate policy engagement reporting. It is a new area for many companies, and we see a variety of approaches and methodologies.

INTRODUCTION

This template outlines the key considerations for companies at each stage of the reporting process:

1

Establish a baseline, make a commitment and plan

2

Identify and analyze direct and indirect advocacy activities

3

Publicly disclose, begin addressing areas of misalignment and embed the process

Under each section there is a list of inputs to help companies as they develop or update their climate policy engagement report, a list of key resources, and examples from leading companies.

Using this template will help companies to align with the CA100+ Global Standard Indicators, the leading criteria used by investors to assess corporate advocacy and its alignment to science-based targets and the Paris Agreement. InfluenceMap uses these indicators to benchmark the top listed company reports [here](#). A list of the Global Standard indicators is provided as an annex, with notes on how the considerations in this guide help companies to meet them.

The importance of RPE reporting

In recent years, companies have come under increased external pressure to provide transparency on their advocacy activities. Companies are now producing reports to meet expectations from stakeholders, especially NGOs and investors. **Beyond meeting external expectations, robust corporate policy engagement reporting provides the following business benefits:**



Provides better data to investors, meeting shareholder requirements or helping to attract finance.



Adds commercial value to the company by enhancing brand reputation and building resilience.



Builds trust and accountability in corporate engagement and advocacy around public policy processes, longer term.



Quality reporting is built on effective internal corporate processes that will lead to the improved functioning of the business.



Identifies where advocacy can better support a company's stated climate goals and the enabling government policies needed to deliver them.

STEP 1

ESTABLISH A BASELINE, MAKE A COMMITMENT AND PLAN

Companies at the start of the process of developing a climate advocacy disclosure report first need to focus on developing a plan for producing the report, completing preparatory work, and establishing relevant baselines.

Any company developing or updating a report is advised to address the following considerations:

1

Establish a cross-department working group to ensure this effort benefits from the full support and expertise of key corporate functions.

- Consider including representatives from Sustainability, Government Affairs, Investor Relations, Public Relations, Legal, Operations Management, and any other departments directly or indirectly involved with advocacy.
- It is best practice to include all subsidiaries, business units and operational jurisdictions in this effort.

2

Engage your board of directors.

- This is a great time to loop in your board of directors if they do not already have oversight over lobbying and other advocacy efforts related to climate change.
- Consider forming a board committee to take on these oversight duties. Engage board members during planning, administration, and ongoing monitoring of all climate advocacy activities.

3

Check with your ESG and Finance Controller team for the EU CSRD on their plan to comply with ESRS G1-5.

- Depending on your double materiality assessment for CSRD, your company may be required to provide certain lobbying disclosures related to climate, including financial or in-kind contributions, and lobbying activity and policy positions.
- Make sure to coordinate with this team to ensure that your efforts on advocacy reporting are easily able to feed into CSRD disclosure.

4

Conduct initial scoping on where your company stands on climate advocacy and disclosure.

- Consider existing ranking and ratings platforms to see how third party groups perceive your climate advocacy efforts. InfluenceMap is the market leader in this analysis, trusted by investors, companies and stakeholders alike.
- Confirm whether investors have engaged with your company on this issue, potentially up to filing a shareholder resolution around increased political engagement transparency.
- Check for any existing reports or public statements around climate policy positions, principles, or activity.

5

Consult relevant stakeholders.

- This includes external stakeholders, such as investors and NGO partners, as well as internal stakeholders such as employees, future talent, and board committees.
- Establish a process for engaging with these stakeholders to seek their feedback in the review of your climate change lobbying policies, positions, and activities.

STEP 1

ESTABLISH A BASELINE, MAKE A COMMITMENT AND PLAN

6

Make a commitment to align your climate lobbying with science-based emissions reduction targets.

- Depending on your company's history of communicating on climate policy and the expectations of your key stakeholders, the commitment may be public or private. It is best practice to make a public commitment to align all your climate advocacy efforts with the 1.5°C limit enshrined in the Paris Agreement. You may decide that a public commitment fits more naturally later in the reporting process. Inform and engage key staff in this effort.
- If you are already receiving investor engagement on this topic, inform them of your intentions to undergo a climate advocacy review over a specific timeframe, with an aim to publish appropriate findings by a specific date or quarter.

7

Designate a specific individual or team within the organization to lead in the production of the report.

- Consider hiring a consulting firm with expertise in this type of strategy planning and reporting to guide your efforts. This has the added benefit of enhancing the credibility and independence of the report.

Important resources

- 1** To review advocacy reports from your peers, see the [database](#) run by InfluenceMap which assess company reports using the CA100+ Global Standard indicators.
- 2** For helpful considerations especially on board governance on this topic, we would point to ["Companies should take a strategic approach to policy engagement in line with societal and investor expectations"](#) by Jules Peck and Dr Jennie Dodson.

For further resources, please see the Coalition's [Responsible Policy Engagement Framework](#).

Business examples



Unilever sets global policy positions that it communicates to all business units and national offices and which all units and offices are expected to advocate in accordance with. As part of their climate policy engagement review, the company assesses the direct and indirect lobbying of business units and national offices to ensure compliance. This process is managed by the CSO and Group Head of Public Affairs, with oversight from the CEO.



[This report](#) from the Interfaith Center on Corporate Responsibility provides additional examples from leading companies' corporate policy engagement reports.



[Unilever](#) identified the specific policy barriers and/or priorities to address in the delivery of their own climate targets for their operations, supply chains and customers. They then outlined the advocacy they are taking in different geographies to address it.

STEP 2

IDENTIFY AND ANALYZE DIRECT AND INDIRECT ADVOCACY ACTIVITIES

Once companies have set a plan and a baseline, and completed preparatory work, they are ready to analyze direct and indirect advocacy related to their climate policy priorities.

Any company developing or updating a report is advised to address the following considerations:

1

Review or establish a list of climate policy priorities.

- Engage the sustainability team or the director responsible for the company's sustainability action plans and/or its climate transition action plan. Identify the policy and/or regulatory barriers to delivery of these plans over both the short (1-2 years) and long term (ie. 2035). These policy priorities should be as specific as possible, and might vary based on geography.

2

Conduct a review of the company's direct advocacy activities against science-aligned climate policy pathways.

Consider all forms of direct advocacy, including:

- direct lobbying
- political campaign donations
- PAC contributions
- funding of think tanks, foundations or advocacy-active NGOs
- serving on government advisory committees
- placing executives in positions in the ruling government administration ("revolving door")
- public communications
- taking legal action against government policies or supporting regulations

3

Conduct a review of your indirect advocacy against science-aligned climate policy pathways, particularly through trade associations.

- See the [Business Associations Climate Action Guide](#) for detailed steps on evaluating and engaging associations.
- Best practice in reporting indirect advocacy includes:
 - Establishing and disclosing clear criteria for determining the degree to which a given association is aligned (or not) with your company's policy priorities.
 - Examining both the top line positions taken by an association, and the actual advocacy actions it takes to influence policy.
 - Take into account the engagement intensity - using third-party analysis will strengthen claims should you need to address areas of misalignment.
- The inclusion of a clear escalation strategy for addressing areas of misalignment.
- Disclosing the amount of money paid to each association in dues or other payments on an annual basis (this can be provided in a range), and where the company or its executives holds a position of leadership.

STEP 2

IDENTIFY AND ANALYZE DIRECT AND INDIRECT ADVOCACY ACTIVITIES

Important resources

- 1** See the guide to assessing and aligning trade group advocacy produced by We Mean Business Coalition with WBCSD, Exponential Roadmap, Climate Action for Associations and several other partners: [Business Associations Climate Action Guide](#).
- 2** An additional resource for companies engaging their trade associations is the '[Assess Your Trade Associations: Action Guide](#)' by Environmental Defense Fund (2024).
- 3** The Good Lobby [Diagnostic](#) provides any company with a full analysis of its corporate political activities and their governance. This self-assessment tool scores the organization's political conduct against 'best lobbying practices' as they emerge from existing voluntary initiatives.
- 4** InfluenceMap analysis on their [LobbyMap platform](#) is a great starting place for third party analysis on corporate direct and indirect advocacy through trade groups.

For further resources, please see the Coalition's [Responsible Policy Engagement Framework](#).

Business examples



ENEL include an extensive breakdown of their direct advocacy by region, country and subnational regions/states in their advocacy disclosure. This goes to the level of detail of providing links to policy briefings and references to specific meetings with federal and state level policymakers and regulators.



GM include in their direct lobbying review engagement on a specific piece of legislation which they supported: the Inflation Reduction Act in the U.S.. The company details how it is supporting the implementation of the legislation, investments it is making, the partnerships it is building in states and cities, and indicates where additional focus is needed by them and others to ensure the policy objectives are met.



NESTLÉ was one of the first companies to publish financial ranges for the membership fees of its trade association. The company included these as a factor in its assessment of whether it could change the position of an association if identified as misaligned in their analysis.



Fortescue

FORTESCUE assesses in its industry association review the alignment of significant trade groups against a wider set of public policy positions that go beyond climate and energy to include biodiversity and human rights. In its review it includes context for Fortescue's purpose in being a member of each association, along with a breakdown of the level of engagement and expected outcomes.

STEP 3

PUBLICLY DISCLOSE, BEGIN ADDRESSING AREAS OF MISALIGNMENT, AND EMBED THE PROCESS

As companies finalize their climate advocacy report, they need to consider publication, how the issues and misalignments identified will be addressed, and how the processes used to produce the report can be embedded in the business.

Any company developing or updating a report is advised to address the following considerations:

1

Identify the most appropriate channel for disclosing the findings of your analysis.

- Some companies have chosen to publish a standalone report on climate advocacy, while others have dedicated sections of their annual sustainability reports to advocacy.
- Any report should include analysis of both direct and indirect advocacy activities.

2

Publish and disseminate the report internally and externally.

- Publish the report on the company website and disseminate it to relevant external stakeholders including investors, NGO partners, trade groups and employee unions.
- Disseminate the report internally to company staff, especially public affairs teams, through the appropriate channels.
- Brief corporate communications and media teams in advance on how to respond constructively to reactions and criticisms following publication.

3

Begin addressing any areas of misalignment identified in Step Two.

- Where the misalignment is with a trade group, there is a growing body of resources to help companies in this engagement. For instance, the Coalition's RPE Framework provides examples and guides for companies to use.
- Note where immediate action can and will be taken, and where issues will take time to address. For example in engaging a trade body about changing its public policy position, engagement with other member companies might need to take place first.

4

Establish an annual review process.

- Be clear and transparent about what steps you will take to continue moving towards full alignment between both your direct and indirect advocacy activities, and how progress will be measured.
- Maintain active engagement with the cross-department working group to ensure sustained buy-in and delivery of objectives.
- It is best practice to include a clear commitment to updating the company's advocacy report on a regular (such as annual) basis.

STEP 3

PUBLICLY DISCLOSE, BEGIN ADDRESSING AREAS OF MISALIGNMENT, AND EMBED THE PROCESS

Important resources

- 1** See the guide to assessing and aligning trade group advocacy produced by We Mean Business Coalition with WBCSD, Climate Action for Associations and several other partners: [Business Associations Climate Action Guide](#).
- 2** Volans and WBCSD are developing a trade association engagement playbook for companies which will be coming out in Spring 2025. This will build on the 2024 Volans report, [How Trade Associations helped put the World on a Sustainable Path](#).

For further resources, please see the Coalition's [Responsible Policy Engagement Framework](#).

Business examples



IBERDROLA has disclosed a clear and detailed framework to address potential misalignments with their trade groups, including escalation strategies and deadlines for industry associations that do not amend misaligned practices. The company's escalation strategy includes engagement with the industry association, sending a 'notification of dissatisfaction', and formal notification that a termination of membership is being assessed. If the association does not provide a clear and credible action plan to address the misalignment within 12 months, Iberdrola will implement one or more of the following actions: make a clear public statement regarding the misalignment, request the industry association refrains from engaging on misaligned issues, and/or suspend or discontinue membership.



NESTLÉ is in the process of reviewing its trade groups identified redundancies, duplications and opportunities to save costs. The company reduced the number of trade groups it is a member of, with significant savings in fees.



BHP undertook a review of its trade groups. Where misalignment was identified it started an engagement process to address it. In the case of three misaligned trade groups, including the U.S. Chamber of Commerce, the company took the ultimate recourse and left them.

GLOBAL STANDARD INDICATORS FOR REFERENCE

#	Standard	Integration
1	Make a public commitment to align all of its climate change lobbying with the goal of restricting global temperature rise to 1.5°C above pre-industrial levels	Step 1
2	Apply the scope of this commitment to all of its subsidiaries and business areas, and all operational jurisdictions	Step 1
3	Publicly commit to taking steps to ensure that the associations, alliances and coalitions of which it is a member conduct their climate change lobbying in line with the goal of restricting global temperature rise to 1.5°C above preindustrial levels	Step 1
4	Assign responsibility at board level for oversight of its climate change lobbying approach and activities	Step 1
5	Assign responsibility at senior management level for day-to-day implementation of its climate change lobbying policies and practices	Step 1
6	Establish an annual monitoring and review process to ensure that all of its direct and indirect climate change lobbying activities across all geographies are consistent with the goal of restricting global temperature rise to 1.5°C above pre-industrial levels	Step 3
7	Establish a process for engaging with stakeholders related to setting and reviewing its climate change lobbying policies, positions and activities	Step 1
8	Establish a clear framework for addressing misalignments between the climate change lobbying positions adopted by the associations, alliances and coalitions of which it is a member and the goal of restricting global temperature rise to 1.5°C above preindustrial levels	Step 2
9	Publish a detailed annual review covering the company's assessment and actions related to the 1.5°C alignment of: (a) its own climate change lobbying activities; (b) the climate change lobbying activities of the associations, alliances, coalitions or thinktanks of which it is a member or to which it provides support	Step 3
10	Recognise the existence of and report on action to address any misalignments between its climate change lobbying and/or the climate change lobbying activities of its trade associations, coalitions, alliances or funded thinktanks and the goal of limiting global temperature rise to 1.5°C above pre-industrial levels	Step 3
11	Create or participate in coalitions that have the specific purpose of lobbying in support of the goal of restricting global temperature rise to 1.5°C above pre-industrial levels	
12	Publicly disclose, for all geographies, its membership of, support for and involvement in all associations, alliances and coalitions engaged in climate change-related lobbying	Step 2
13	Publicly disclose, for each of these organisations: (a) how much it pays to them on an annual basis; (b) those organisations where it sits on the board or plays an active role in committees or other activities related to climate change	Step 2
14	Publicly disclose its overall assessment of the influence that its climate lobbying has had on (a) supporting ambitious public climate change policy; (b) the company's ability to deliver its own corporate transition strategy	Step 3