



RECOMMENDATIONS FOR ASSET MANAGERS | LOBBYING PRACTICES

February 2023

This document is part of a set of recommendations for asset managers to develop their climate policies. To be found [HERE](#).

Asset managers shall adopt a responsible lobbying policy consistent with a 1.5°C scenario.

All lobbying activities in which asset managers participate and that are aimed at influencing public officials (direct lobbying, such as governments, legislators, regulators, administration, international organisations, etc.) and public opinion (indirect lobbying, such as journalists, scientists, artists, etc.) shall apply to all their employees, subsidiaries and contractors, all business areas, and all operational jurisdictions.

Asset managers shall commit, through a published code of conduct, to:

- Align climate change-related lobbying objectives and activities with a 1.5°C objective and establish an annual monitoring and review process to ensure that all direct and indirect climate change lobbying activities follow this commitment.¹
- Disclose, for all geographies, the climate change related lobbying objectives and recommendations (especially position papers submitted to public officials), as well as the assessment of the influence that this lobbying has had on (a) supporting ambitious public climate change policy, and (b) the company's ability to deliver its own corporate transition strategy.
- Disclose, for all geographies, their membership of, support for and involvement in all lobbying groups engaged in climate change-related lobbying.
- Establish a clear framework for escalation concerning misalignment between lobbying positions adopted by these groups and the 1.5°C scenario². This escalation should include leaving such lobbying groups if their activities are detrimental to reaching the 1.5°C target.
- Disclose the agenda of meetings with public authorities and the nature of the public decisions targeted by the lobbying activities.

- Disclose the budget spent on climate change-related lobbying, including the budget spent directly, through the previously mentioned lobbying institutions and through consulting firms or other external bodies.
- Create or participate in coalitions that have specific purpose of lobbying in support of the 1.5°C objective.
- Commit not to challenge the phase out of fossil fuel facilities through investor-state dispute settlement mechanisms (ISDS) and other legal mechanisms.³
- Commit to disseminate only science-based, up-to-date and verifiable information or arguments, and not disseminate deliberately biased information.
- Name a senior decision-maker who is responsible for implementing these policies.
- Create or participate in coalitions with the specific purpose of lobbying in support of the 1.5°C objective. These should integrate all kind of financial institutions, data providers, rating agencies, shareholder voting agencies, etc.
- Sign the Global Standard on Responsible Climate Lobbying (RCLS)⁴

For more information, asset managers can refer to the [methodology](#) of indicator 7 (Climate policy engagement) set by the Climate Action 100+ and the [Recommendation of the Council on Principles for Transparency and Integrity in Lobbying](#) published by the OECD.

¹ For more information: PRI, [Converging on climate lobbying: aligning corporate practice with investor expectations](#), May 2018

² For more information: CERES, [Blueprint for Responsible policy engagement on climate change](#), June 2020

³ For more information : IISD, [Investor-State Disputes in the Fossil Fuel Industry](#), December 2021

⁴ For more information: PRI, [Climate lobbying](#), March 2022