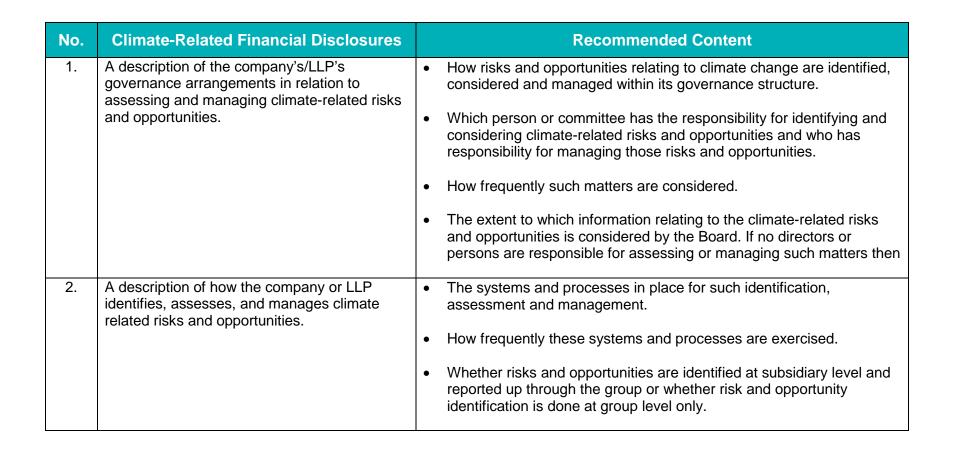
## Table of Content Guidelines for Climate-Related Financial Disclosures



**Akin Gump** 

STRAUSS HAUER & FELD ILP

No.	Climate-Related Financial Disclosures	Recommended Content
3.	A description of how processes for identifying, assessing, and managing climate-related risks are integrated into the company's/LLP's overall risk management process.	• The <b>extent</b> to which climate-related risk is currently integrated into the overall approach to risk management or whether the identification, assessment and management of climate-related risks are subject to separate processes and procedures.
4.	<ul> <li>A description of:</li> <li>(i) The principle climate-related risks and opportunities arising in connection with the company's operations.</li> <li>(ii) The time periods by reference to which those risks and opportunities are assessed.</li> </ul>	<ul> <li>Acute physical risks (short term weather events such as storms) and chronic physical risks (long term weather patterns like sea level changes) at a level of detail appropriate to the geographical area and business operations of the company/LLP.</li> <li>Transition risks associated with mitigation of and adaptation to climate change. Such consideration should clearly and individually deal with the full spectrum of risk/opportunity areas (e.g., technology, policy, market, legal, reputational, etc.) involved with this transition at a detail and order appropriate to (i) the impact-level of the risk/opportunity and (ii) the relevance to the company/LLP's broader operations.</li> <li>In identifying climate-related risks, a business should consider all relevant time horizons, not just those that are usually considered for budgetary, strategy or planning purposes.</li> <li>Risks categorized into short term, medium term and long term, with an explanation for how those periods were determined. "Appropriate" durations will vary according to the nature of the business in question.</li> <li>Likely time periods over which the risks or opportunities are expected to crystallize.</li> <li>The mitigation actions the business has put in place, and the mitigating steps it will take if such a risk is to transpire.</li> </ul>
5.	A description of the actual and potential	<ul> <li>As granular as is necessary to understand the impact of crystallization</li> </ul>
0.	impacts of the principal climate-related risks	of that risk and should be specific.

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	and opportunities on the company's/LLP's business model and strategy.	• The actions that are being put in place now and contingency plans for actions which may be taken in the future.
		Examples:
		<ul> <li>If major plants are located areas increasingly prone to flooding, content on which plants are at risk, the importance of that plant to the business and the impact of a flood on the plant and wider operations of the group.</li> </ul>
		<ul> <li>If there are high costs associated with transitioning to low emission technologies, content on the potential retirements of existing assets, research and development of new solutions, capital expenditure on new technologies or adoption of new processes or practices.</li> </ul>
6.	An analysis of the resilience of the company's/LLP's business model and strategy, taking into account consideration of different climate-related scenarios.	Resilience measured with reference to different climate change scenario projections. Scenarios to be selected according to business relevance and be sufficiently varied to cover a range of future outcomes relevant to the business.
		• Disclosures and explanations for which scenarios have been used, including, where appropriate, the source of those scenarios and the effect that operating within that scenario would have on the resilience of the current business model and strategy.
		• Description and explanation of the assumptions and estimates that underpin the scenario analysis. Where these assumptions and estimates change or diverge from market standard, justification ought to be given.
		• Scenario analysis to be qualitative in nature. That is, using narratives to explore implications of different possible climate impacts.
		To be renewed as necessary in accordance with changing

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7.	A description of the targets used by the company/LLP to manage climate-related risks and to realize climate-related opportunities and of performance against those targets.	<ul> <li>circumstances and at least every three years.</li> <li>Example: <ul> <li>A business which generates substantial emissions may consider scenarios where those emissions are required to be reduced under different time frames and the effect on the business resulting from those required reduction in emissions or may consider the financial cost associated with a higher carbon price over a range of time horizons.</li> </ul> </li> <li>Target should be properly explained, including the relevance of the targets to the future operations of the company or LLP.</li> <li>Timeframe over which the company or LLP intends to meet those targets.</li> <li>How the company/LLP monitors and assesses progress in meeting those targets.</li> <li>Where possible, targets to be linked to the information provided under Reporting Guidelines 4, 5 and 6 above.</li> </ul>
8.	The key performance indicators (KPIs) used to assess progress against targets used to manage climate-related risks and realize climate-related opportunities and a description of the calculations on which those key performance indicators are based.	<ul> <li>Which climate-related KPIs the company/LLP uses to assess progress against the targets set out at row 7 to manage climate risks and opportunities, how these are calculated, and, if different from the targets set, how the KPIs relate to targets.</li> <li>Where such KPIs change, the reason for the change should be disclosed together with explanations of why the new KPI is more effective than the previous measurements</li> </ul>