

# Oxford Climate Policy Monitor

## 2024 Survey

**Jurisdiction**

Brazil

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**Law firm**

Mattos Filho

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**Climate  
Policy  
Monitor**

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## Policy Tool Name: CVM Resolution 193

3. Source material link(s):

<https://web.archive.org/web/20240822053302/https://conteudo.cvm.gov.br/legislacao/resolucoes/resol193.html>

4. Which of the following governance domains does this policy tool relate to? Select all that apply.

☒ Climate-related disclosure

☐ Transition planning

☐ Public procurement

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6. Select the category which best describes the author/issuer of the policy tool.

☐ Head of state and/or government

☐ Independent regulatory or supervisory body

☐ Legislature

☐ Judiciary

☐ Ministry/Department/Agency

☒ Other (Please describe) The Brazilian Securities and Exchange Commission

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7. Status of the policy tool

☒ Approved, in force

☐ Approved, not yet in force

☐ Other (Please describe)

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9. Year of (planned) entry into force or year of publication

2023

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10. Does the policy tool have an end date?

☒ No

☐ Yes

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12. Briefly describe the policy tool's goal and/or purpose:

For example: The policy tool requires publicly listed companies to comply with the recommendations of the Task Force for Climate Related Financial Disclosure or to explain the absence of such disclosures.

The Resolution pertains to the preparation and disclosure of financial information reports related to sustainability and climate by publicly held companies, based on the international standard issued by the International Sustainability Standards Board (ISSB). Companies may voluntarily adopt the Resolution by 2025 (referring to the fiscal year ended on December 31, 2024) and will be obligated to disclose the annual report by 2027 (referring to the fiscal year ended on December 31, 2026).

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13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.

☒ 1. Comissão de Valores Mobiliários (CVM) The Brazilian Securities and Exchange Commission

☐ 2.

☐ 3.

☐ 4.

☐ 5.

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15. To provide contextual information, rate the capacity of Comissão de Valores Mobiliários (CVM) The Brazilian Securities and Exchange Commission to undertake the policy tool's implementation and/or enforcement.

☐ 0- No Capacity (Please explain)

☐ 1- Low Capacity (Please explain)

☐ 2- Medium Capacity (Please explain)

● 3- High Capacity (Please explain) The CVM is the government body responsible for overseeing the securities and exchange regulation in Brazil and has full authority to enforce its regulation and prosecute the market players on its matters

○ Prefer not to answer

○ Not Applicable

25. Which entities are targeted through this policy tool? Select all that apply.

Note: With regard to sectoral actors, in cases where mandatory and voluntary obligations are mixed (e.g., mandatory for one sector, voluntary for another), select "mandatory" as there will be further opportunity to clarify.

	Mandatory	Voluntary	Not targeted
1. Publicly-traded entities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Private companies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Financial institutions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Small and medium-sized enterprises	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. State-owned companies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Not-for-profit organizations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Government agencies and/or departments (supranational)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Government agencies and/or departments (national)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Government agencies and/or departments (regional - e.g., state, province, region, metropolitan region)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Government agencies and/or departments (local - e.g., county, district, municipality, city)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Government agencies and/or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

departments (unspecified)			
12. Sectoral actors (e.g., healthcare, defense, utilities, education)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

13. Other Text: investment funds, and securitization companies

27. Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory.

	Publicly-traded entities
Minimum number of employees (Enter min number of full-time employees - FTEs)	
Minimum revenue (Enter minimum revenue)	
Minimum assets (Enter minimum assets)	
Minimum contract value (Enter minimum contract value)	
Entity is headquartered in the jurisdiction	
Entities are subjected to disclosure or reporting requirements	The regulation is applicable to all publicly held companies.

28. Can entities for whom compliance with the policy tool is mandatory opt out of the obligation (e.g. comply or explain)?

☒ No

☐ Yes

30. Does the policy tool exclusively apply to entities' domestic operations, or does it also apply to entities' operations beyond the jurisdiction?

☐ Operations within jurisdiction only

☐ Operations beyond the jurisdiction

☒ Not applicable

32. What are the sanctions for non-compliance? Select all that apply and describe in the text field.

- ☒ Monetary fine Up to R\$ 50 million
- ☒ Restriction on business activities Suspension of authorization or registration for the exercise of specific activities in the capital market (specified in art. 1 of Law No. 6,385/1976) and/or temporary prohibition of activity
- ☐ Voiding or setting aside of contract
- ☐ Exclusion from government contracts
- ☐ Award of damages or compensation
- ☒ Penalty for senior managers Breach of the fiduciary duties and disclosure obligations applicable to the managers may be prosecuted by the CVM
- ☐ Criminal penalties
- ☐ Not specified
- ☐ Not applicable (e.g. in cases of voluntary tools)
- ☐ Other

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33. Relative to other compliance activities required of entities in this jurisdiction, is the cost of compliance:

- ☐ Below average
- ☐ Average
- ☐ Above average
- ☐ Not applicable
- ☒ Unknown or prefer not to answer

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35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority.

- ☐ Below average
- ☐ Average
- ☐ Above average



- ☐ Not applicable
- ☒ Unknown or prefer not to answer

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37. Have the climate-specific provisions in this instrument ever been enforced?

- ☒ No (If relevant, explain)
- ☐ Yes

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39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool?

- ☒ No
- ☐ Yes

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41. Does the policy tool recommend or require periodic impact assessments?

- ☒ No
- ☐ Recommended
- ☐ Required

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43. Does the policy tool recommend or require periodic reviews?

- ☒ No
- ☐ Recommended
- ☐ Required

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45. Does the policy tool include mechanisms for enhancing policy or regulatory coordination with subnational governments (e.g. vertical coordination mechanisms such as appointing coordinating agencies, forming working groups, etc.)?

☒ No

☐ Yes

47. Are there any government initiatives to enhance the capacity of targeted entities to implement or comply with the policy tool (e.g. industry working groups, outreach campaigns, education and training, etc.)?

☒ No

☐ Yes

#### Domain-Specific Questions: Disclosure Questions

#### What is being disclosed?

52. Are targeted entities recommended or required to disclose any of the following climate-related information? Select all that apply.

	Recommended	Required	Neither recommended nor required
1. Greenhouse gas (GHG) emissions	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. GHG emissions offsets or removals	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. GHG emissions reduction targets	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Other climate-related targets	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Physical climate risk	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Transition risk	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Transition plan	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Disclosure of Greenhouse Gas (GHG) Emissions

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54. Which GHG emissions must be disclosed? Select all that apply.

- ☒ Carbon dioxide (CO<sub>2</sub>)
  - ☒ Methane (CH<sub>4</sub>)
  - ☒ Nitrous oxide (N<sub>2</sub>O)
  - ☒ Hydrofluorocarbons (HFCs)
  - ☒ Perfluorocarbons (PFCs)
  - ☒ Sulphur hexafluoride (SF<sub>6</sub>)
  - ☒ Nitrogen trifluoride (NF<sub>3</sub>)
  - ☒ Carbon dioxide equivalent (CO<sub>2</sub>e)
- 

55. Are entities recommended or required to disclose gross emissions?

- ☐ No
  - ☐ Recommended
  - ☒ Required
- 

56. Are entities recommended or required to disclose net emissions?

- ☒ No
  - ☐ Recommended
  - ☐ Required
- 

57. What Scope of emissions must be disclosed? Select all that apply.

- ☒ Scope 1 emissions
- ☒ Scope 2 emissions

- ☐ Scope 3 emissions, relevant or material
  - ☐ Scope 3 emissions, a specified proportion of coverage (Please describe)
  - ☒ Scope 3 emissions, all
  - ☐ Not specified
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58. Are entities recommended or required to disclose GHG emissions accounting methodologies or standards?

Yes, entities must disclose the approach they use to measure their greenhouse gas emissions in accordance with the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004)

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59. Does the policy tool recommend or require the GHG inventory be third-party verified?

- ☒ No
  - ☐ Recommended
  - ☐ Required
- 
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60. If necessary, provide additional clarification to the above responses about greenhouse gas (GHG) emissions disclosure.

The resolution does not directly establish that it is necessary to disclose information on greenhouse gas emissions, but by linking it to the adoption of IFRS S1 and IFRS2 standards, it does so indirectly.

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#### **Disclosure of Greenhouse Gas (GHG) Offsets or Removals**

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62. Does the policy tool recommend or require offsetting purchases be disclosed?

- ☐ No

○ Recommended (Please describe and reference the relevant section/subsection/paragraph of the policy tool)

● Required (Please describe and reference the relevant section/subsection/paragraph of the policy tool) IFRS S2 requires an entity to describe its planned use of carbon credits to offset emissions to achieve any net greenhouse gas emissions targets the entity has set, or any it is required to meet by law or regulation. IFRS S2, item 36, e

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63. Does the policy tool recommend or require entities disclose whether offsets are verified?

○ No

○ Recommended (Please describe and reference the relevant section/subsection/paragraph of the policy tool)

● Required (Please describe and reference the relevant section/subsection/paragraph of the policy tool) IFRS S2 establishes that the entity shall disclose information about (i) the extent to which, and how, achieving any net greenhouse gas emissions target relies on the use of carbon credits; (ii) which third-party scheme(s) will verify or certify the carbon credits; (iii) the type of carbon credit, including whether the underlying offset will be nature-based or based on technological carbon removals, and whether the underlying offset is achieved through carbon reduction or removal; and (iv) any other factors necessary for users of general purpose financial reports to understand the credibility and integrity of the carbon credits the entity plans to use. IFRS S2, 36, e

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64. Does the policy tool recommend or require any certification standards for the use of GHG offsetting or removals?

○ No

○ Recommended (Please list the certification standards, describe their use, and reference the relevant section/subsection/paragraph of the policy tool)

● Required (Please describe and reference the relevant section/subsection/paragraph of the policy tool) Although the policy tool does not recommend the use of specific certifications, the IFRS S2 establishes that the entity shall disclose information which third-party scheme(s) will verify or certify the carbon credits and other factors necessary for users of general purpose financial reports to understand the credibility and integrity of the carbon credits the entity plans to use. IFRS S2, 36, e

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65. Does the policy tool include any other recommendations or requirements regarding the appropriate use of offsets?

- No
- Recommended (Please describe and reference the relevant section/subsection/paragraph of the policy tool)
- Required (Please describe and reference the relevant section/subsection/paragraph of the policy tool) IFRS S2 establishes that the entity shall disclose information about the type of carbon credit, including whether the underlying offset will be nature-based or based on technological carbon removals, and whether the underlying offset is achieved through carbon reduction or removal and other factors necessary for users of general purpose financial reports to understand the credibility and integrity of the carbon credits the entity plans to use. IFRS S2, 36, e

### Disclosure of Greenhouse Gas (GHG) Emissions Reduction Targets

67. Which of the following targets, or data related to targets, does the policy tool request entities disclose? Select any of the following which apply:

	Recommended	Required	Neither recommended nor required
An absolute emissions reduction target	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
An intensity-based emissions reduction target	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A net zero target	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Targets covering non-carbon GHG emissions	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A Scope 3 emissions target	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A target derived using a sectoral decarbonization approach	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Interim targets	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A target timeframe (e.g. by 2040)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A baseline year from which progress is measured	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A level of ambition for emissions reductions (e.g. 80% reduction)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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68. Does the policy tool recommend or require entities to disclose their progress in achieving their emissions reductions targets?

- ☐ No
  - ☐ Recommended
  - ☒ Required
- -----

69. What is the recommended or required frequency of progress reports regarding the achievement of emissions reductions targets?

- ☐ Yearly
  - ☐ Every two years
  - ☐ Every three years
  - ☐ Every four years
  - ☐ Every five years
  - ☐ Every ten years or more
  - ☐ Other
  - ☒ No prescribed frequency
- -----

70. Does the policy tool recommend or require a scope of emissions which should be covered by the absolute emissions reduction target? Select all that apply.

- ☐ Scope 1 emissions
- ☐ Scope 2 emissions
- ☐ Scope 3 emissions (relevant or material)
- ☐ Scope 3 emissions (a specified proportion of coverage)
- ☐ Scope 3 emissions (all)
- ☒ Not specified

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71. Does the policy tool recommend or require a scope of emissions which should be covered by the intensity-based emissions reduction target? Select all that apply.

- ☐ Scope 1 emissions
  - ☐ Scope 2 emissions
  - ☐ Scope 3 emissions (relevant or material)
  - ☐ Scope 3 emissions (a specified proportion of coverage)
  - ☐ Scope 3 emissions (all)
  - ☒ Not specified
- -----

72. Does the policy tool recommend or require a scope of emissions which should be covered by the net zero target? Select all that apply.

- ☐ Scope 1 emissions
  - ☐ Scope 2 emissions
  - ☐ Scope 3 emissions, relevant or material
  - ☐ Scope 3 emissions, a specified proportion of coverage (Please describe)
  - ☐ Scope 3 emissions, all
  - ☒ Not specified
- -----

73. What is the recommended or required year for the net zero target (e.g. net zero by...)?

- ☐ Between 2030 and 2035
- ☐ Between 2036 and 2040
- ☐ Between 2041 and 2045
- ☐ Between 2046 and 2050
- ☐ Between 2051 and 2060
- ☐ Between 2061 and 2070



☐ Other

☒ Not specified

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74. Which of the following non-carbon GHG emissions reductions targets are entities recommended or required to disclose? Select all that apply.

☒ Methane (CH<sub>4</sub>)

☒ Nitrous oxide (N<sub>2</sub>O)

☒ Hydrofluorocarbons (HFCs)

☒ Perfluorocarbons (PFCs)

☒ Sulphur hexafluoride (SF<sub>6</sub>)

☒ Nitrogen trifluoride (NF<sub>3</sub>)

☒ Carbon dioxide equivalent (CO<sub>2</sub>e)

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75. For which of the following sectors are entities recommended or required to disclose targets derived using a sectoral decarbonization approach? Select all that apply.

☐ Power generation

☐ Industry

☐ Transport Services

☐ Services/Commercial buildings

☐ Other

☒ None specified

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76. Are targets derived using a sectoral decarbonization approach recommended or required to be validated by a third-party?

☒ No

☐ Recommended

☐ Required

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77. What is the recommended or required level of ambition for interim targets?

- Reduction between 1-25%
  - Reduction between 26-50%
  - Reduction between 51-75%
  - Reduction of over 75%
  - Other
  - ☒ None specified
- -----

78. What are the recommended or required years for interim targets?

- 2025-2030
  - 2031-2040
  - 2041-2050
  - Other
  - None specified
- -----

79. What is the recommended or required timeframe for long-term targets (e.g. by 2050, 2060)?

- Between 2030 and 2035
- Between 2036 and 2040
- Between 2041 and 2045
- Between 2046 and 2050
- Between 2051 and 2060
- Between 2061 and 2070
- ☒ Other: The Resolution does not set a specific timeframe for long-term targets. IFRS S2 only indicates that information on the base year should be reported.
- None specified

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80. What is the recommended or required baseline year from which progress is to be measured?

- ☐ 1990-2000
  - ☐ 2001-2005
  - ☐ 2006-2010
  - ☐ 2011-2015
  - ☐ 2016-2020
  - ☒ Other Not specified
- -----

81. Are entities recommended or required to disclose the methodologies by which they select baseline years?

- ☒ No
  - ☐ Recommended
  - ☐ Required
- -----

82. What is the recommended or required level of ambition for GHG emissions reductions targets?

- ☐ Reduction between 1-25%
  - ☐ Reduction between 26-50%
  - ☐ Reduction between 51-75%
  - ☐ Reduction between 75-85%
  - ☐ Reduction between 85-100%
  - ☐ Reduction of more than 100%
  - ☒ Other The Resolution does not set an specific level of ambition required or recommended. IFRS S2 only indicates that information on the level of ambition should be reported.
- -----

**Disclosure of other climate-related targets**

84. Which of the following other climate-related targets does the policy tool recommend or require entities disclose? Select all that apply.

- ☐ Targets for renewable energy procurement (Please reference the section/subsection/paragraph of the policy tool relevant to renewable energy procurement targets)
- ☐ Targets for fossil fuel phase down/phase out (Please reference the section/subsection/paragraph of the policy tool relevant to fossil fuel phase down/phase out)
- ☐ Targets or goals related to climate adaptation (Please reference the section/subsection/paragraph of the policy tool relevant to climate adaptation)
- ☐ Targets or goals related to nature and/or biodiversity (Please reference the section/subsection/paragraph of the policy tool relevant to nature and/or biodiversity)
- ☐ Targets or goals related to just transition (Please reference the section/subsection/paragraph of the policy tool relevant to just transition)
- ☒ Other targets (Please reference the section/subsection/paragraph of the policy tool relevant to other targets) The Resolution does not set any specific climate-related targets that must be disclosed. IFRS S2 only indicates that if any climate-related targets exist, it should be reported.

### Disclosure of Physical Risk

86. What types of physical risk must be disclosed?

- ☒ To company
- ☐ To society (double materiality)

87. What is the materiality standard for the disclosure of physical risk?

- ☒ Self-assessed material risk
- ☐ Externally-defined material risk
- ☐ Other (Describe)

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88. Are entities recommended or required to disclose the results of climate risk-related stress tests that are related to physical climate risk?

- ☐ No
- ☐ Recommended
- ☒ Required

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89. Are entities recommended or required to disclose their methodology for scenario analysis with relation to physical risk?

- ☐ No
- ☐ Recommended
- ☒ Required

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90. Are risk assessments of physical risk recommended or required to be third-party verified?

- ☒ No
- ☐ Recommended
- ☐ Required

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**Disclosure of Transition Risk**

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92. What types of transition risk must be disclosed? Select all that apply

- ☒ Risks that societal transitions may pose to the disclosing entity
- ☐ Risks that the disclosing entity's transition may pose to society (double materiality)

93. What is the materiality standard for the disclosure of transition risk?

- ☒ Self-assessed material risk
- ☐ Externally-defined material risk
- ☐ Other (Describe)

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94. Are entities recommended or required to disclose the results of climate-related risk stress tests that are related to transition risk?

- ☐ No
- ☐ Recommended
- ☒ Required

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95. Are transition risk assessments recommended or required to be third-party verified?

- ☒ No
- ☐ Recommended
- ☐ Required

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96. Are entities recommended or required to disclose their methodology for scenario analysis related to transition risk?

- ☐ No
- ☐ Recommended
- ☒ Required

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#### **Disclosure of Transition Plans**

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98. What is the recommended or required frequency of transition plan disclosures?

- Yearly
  - Every two years
  - Every three years
  - Every four years
  - Every five years
  - Every ten years or more
  - Other
  - ☒ Not specified
- 
- 

99. Does the policy tool recommend or require audited accuracy and/or third-party verification of the transition plan?

- ☒ No
  - Recommended
  - Required
- 
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100. Does the policy tool recommend or require entities to disclose progress in implementing transition plans?

- No
  - Recommended
  - ☒ Required
- 
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101. What is the recommended or required frequency of disclosures related to transition plan implementation progress?

- Yearly
- Every two years
- Every three years
- Every four years

- Every five years
- Every ten years or more
- Other
- ☒ No prescribed frequency

102. Does the policy tool recommend or require targeted entities to disclose their financial plans for implementing transition plans?

- No
- Recommended
- ☒ Required

103. Does the policy tool recommend or require targeted entities to disclose their methodology for scenario analysis related to transition planning?

- No
- Recommended
- ☒ Required

#### Other disclosures

105. Are targeted entities recommended or required to disclose any other climate-related information? Select all that apply.

	Required	Recommended	Neither recommended nor required
1. Climate-related opportunities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Remuneration based on achieving climate-related goals	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



3. Taxonomies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Capital allocation and/or expenditure plans (in the context of climate change)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Due diligence	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Assumptions and Dependencies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Data limitations of scenario analyses	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Financial implications of climate-related matters (e.g., integration of climate-related disclosures into financial accounting standards)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Stewardship (e.g., whether stewardship codes are in place, how entities vote in shareholder meetings, etc.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. ESG methodologies and criteria (in the case of service providers)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. Asset planning or ownership in the context of climate change	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Sectoral investment policies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13. Climate-related lobbying and/or policy engagement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14. Locked-in emissions or information on emissive assets with long lifespans	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
15. Dirty asset divestiture	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16. Nature-related impacts	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
17. Just transition indicators	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

106. Is third-party verification of climate-related opportunities recommended or required?

- ☒ No
- ☐ Recommended
- ☐ Required

107. Describe and reference the section/subsection/paragraph of the policy tool relevant to disclosures regarding remuneration based on achieving climate-related goals.

IFRS S2 establishes that the entity shall disclose a description of whether and how climate-related considerations are factored into executive remuneration (see also paragraph 6(a)(v)); and the percentage of executive management remuneration recognized in the current period that is linked to climate related considerations.

109. Describe and reference the section/subsection/paragraph of the policy tool relevant to capital allocation and/or expenditure plans disclosures.

The Resolution 193 refers directly to the international standards pursuant to IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information and IFRS S2 – Climate-related Disclosures, both issued by the International Sustainability Standards Board (ISSB).

111. Describe and reference the section/subsection/paragraph of the policy tool relevant to assumptions and dependencies disclosures.

IFRS S2 establishes that the entity shall disclose information about the key assumptions the entity made in the analysis of the climate-related topics (e.g item 12, iv, item 22, b, ii)

112. Describe and reference the section/subsection/paragraph of the policy tool relevant to data limitation disclosures.

IFRS S2 establishes that that the entity shall disclose information about data sources analyzed (e.g. 25, a, i)

113. Describe and reference the section/subsection/paragraph of the policy tool relevant to disclosures regarding the financial implications of climate-related matters.

The Resolution 193 refers directly to the international standards pursuant to IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information and IFRS S2 – Climate-related Disclosures, both issued by the International Sustainability Standards Board (ISSB).

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114. Describe and reference the section/subsection/paragraph of the policy tool relevant to stewardship-related disclosures.

IFRS S2 establishes that that the entity shall disclose information about the governance of the climate-related aspects.

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116. Describe and reference the section/subsection/paragraph of the policy tool relevant to asset planning disclosures.

IFRS S2 establishes that that the entity shall disclose information about the how the entity expects its financial position to change over the short, medium and long term, given its strategy to manage climate-related risks and opportunities, taking into consideration: (i) its investment and disposal plans (for example, plans for capital expenditure, major acquisitions and divestments, joint ventures, business transformation, innovation, new business areas, and asset retirements), including plans the entity is not contractually committed to; and (ii) its planned sources of funding to implement its strategy. (16. c)

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121. Describe and reference the section/subsection/paragraph of the policy tool relevant to disclosure of dirty asset divestiture.

IFRS S2 establishes that that the entity shall disclose information about the how the entity expects its financial position to change over the short, medium and long term, given its strategy to manage climate-related risks and opportunities, taking into consideration: (i) its investment and disposal plans (for example, plans for capital expenditure, major acquisitions and divestments, joint ventures, business transformation, innovation, new business areas, and asset retirements), including plans the entity is not contractually committed to; and (ii) its planned sources of funding to implement its strategy. (16. c)

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## Standards, Frameworks, and Guidelines

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125. Does the policy tool require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply.

	Required	Referenced	Neither required nor referenced
1. IFRS S1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. IFRS S2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Task Force on Climate-related Financial Disclosures (TCFD)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. GHG Protocol Corporate Accounting and Reporting Standard	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. CDP (formerly known as Climate Disclosure Project) reporting framework	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. International Integrated Reporting Framework	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Global Reporting Initiative (GRI)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Sustainability Accounting Standards Board (SASB)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. European Sustainability Reporting Standards (ESRS)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. Taskforce on Nature-related Financial Disclosures (TNFD)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12. Partnership for Carbon Accounting Financials (PCAF)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

13. Glasgow Financial Alliance for Net Zero (GFANZ)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Additional Important Information**

197. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

None

## Policy Tool Name: CVM Resolution 80

3. Source material link(s):

<https://web.archive.org/web/20240822045020/https://conteudo.cvm.gov.br/legislacao/resolucoes/resol080.html>

4. Which of the following governance domains does this policy tool relate to? Select all that apply.

☒ Climate-related disclosure

☐ Transition planning

☐ Public procurement

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6. Select the category which best describes the author/issuer of the policy tool.

☐ Head of state and/or government

☐ Independent regulatory or supervisory body

☐ Legislature

☐ Judiciary

☐ Ministry/Department/Agency

☒ Other (Please describe) The Brazilian Securities and Exchange Commission

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7. Status of the policy tool

☒ Approved, in force

☐ Approved, not yet in force

☐ Other (Please describe)

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9. Year of (planned) entry into force or year of publication

2022

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10. Does the policy tool have an end date?

☒ No

☐ Yes

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12. Briefly describe the policy tool's goal and/or purpose:

For example: The policy tool requires publicly listed companies to comply with the recommendations of the Task Force for Climate Related Financial Disclosure or to explain the absence of such disclosures.

The Resolution pertains to the registration and periodic and occasional reporting requirements for publicly held companies. Additionally, it addresses the disclosure of environmental, social, and governance (ESG) information by publicly held companies with specific provisions on climate disclosure.

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13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.

☒ 1. Comissão de Valores Mobiliários (CVM) - The Brazilian Securities and Exchange Commission

☐ 2.

☐ 3.

☐ 4.

☐ 5.

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15. To provide contextual information, rate the capacity of Comissão de Valores Mobiliários (CVM) - The Brazilian Securities and Exchange Commission to undertake the policy tool's implementation and/or enforcement.

☐ 0- No Capacity (Please explain)

☐ 1- Low Capacity (Please explain)

☐ 2- Medium Capacity (Please explain)

● 3- High Capacity (Please explain) The CVM is the government body responsible for overseeing the securities and exchange regulation in Brazil and has full authority to enforce its regulation and prosecute the market players on its matters.

○ Prefer not to answer

○ Not Applicable

25. Which entities are targeted through this policy tool? Select all that apply.

Note: With regard to sectoral actors, in cases where mandatory and voluntary obligations are mixed (e.g., mandatory for one sector, voluntary for another), select "mandatory" as there will be further opportunity to clarify.

	Mandatory	Voluntary	Not targeted
1. Publicly-traded entities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Private companies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Financial institutions	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Small and medium-sized enterprises	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. State-owned companies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Not-for-profit organizations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Government agencies and/or departments (supranational)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Government agencies and/or departments (national)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Government agencies and/or departments (regional - e.g., state, province, region, metropolitan region)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. Government agencies and/or departments (local - e.g., county, district, municipality, city)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. Government agencies and/or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



departments (unspecified)			
12. Sectoral actors (e.g., healthcare, defense, utilities, education)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

27. Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory.

	Publicly-traded entities
Minimum number of employees (Enter min number of full-time employees - FTEs)	
Minimum revenue (Enter minimum revenue)	
Minimum assets (Enter minimum assets)	
Minimum contract value (Enter minimum contract value)	
Entity is headquartered in the jurisdiction	
Entities are subjected to disclosure or reporting requirements	The regulation is applicable to all publicly held companies.

28. Can entities for whom compliance with the policy tool is mandatory opt out of the obligation (e.g. comply or explain)?

- ☐ No
- ☒ Yes

29. Describe the available opt-out provisions (e.g. “comply or explain”), referencing the relevant section/subsection/paragraph of the policy tool.

The ESG disclosure is mandatory to all publicly held companies, however the company does not have to comply with the policy as long as it explains the reason for not implementing in the disclosure documents (formulário de referência). The relevant section of the Resolution is Annex C, which provides for the items of the reference form that may be explained or complied with (items 1.9, 7.1, 7.2, and 8.1).

30. Does the policy tool exclusively apply to entities' domestic operations, or does it also apply to entities' operations beyond the jurisdiction?

- ☐ Operations within jurisdiction only
  - ☐ Operations beyond the jurisdiction
  - ☒ Not applicable
- 
- 

32. What are the sanctions for non-compliance? Select all that apply and describe in the text field.

- ☒ Monetary fine Up to R\$ 50 million
  - ☒ Restriction on business activities Suspension of authorization or registration for the exercise of specific activities in the capital market (specified in art. 1 of Law No. 6,385/1976) and/or temporary prohibition of activity
  - ☐ Voiding or setting aside of contract
  - ☐ Exclusion from government contracts
  - ☐ Award of damages or compensation
  - ☒ Penalty for senior managers Breach of the fiduciary duties and disclosure obligations applicable to the managers may be prosecuted by the CVM
  - ☐ Criminal penalties
  - ☐ Not specified
  - ☐ Not applicable (e.g. in cases of voluntary tools)
  - ☐ Other
- 
- 

33. Relative to other compliance activities required of entities in this jurisdiction, is the cost of compliance:

- ☐ Below average
- ☐ Average
- ☐ Above average
- ☐ Not applicable
- ☒ Unknown or prefer not to answer

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35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority.

- ☐ Below average
  - ☐ Average
  - ☐ Above average
  - ☐ Not applicable
  - ☒ Unknown or prefer not to answer
- -----

37. Have the climate-specific provisions in this instrument ever been enforced?

- ☒ No (If relevant, explain)
  - ☐ Yes
- -----

39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool?

- ☐ No
  - ☒ Yes
- -----

40. Describe the monitoring systems in place. Please reference the relevant section/subsection/paragraph of the policy tool where monitoring systems are set.

The CVM discloses its risk based biennial supervision plan, in which the ESG comply or explain disclosures were set as a priority topic. The CVM is the government body responsible for overseeing the securities and exchange regulation in Brazil and has full authority to enforce its regulation and prosecute the market players on its matters based on the public information disclosed, including the reference form.

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41. Does the policy tool recommend or require periodic impact assessments?

- ☒ No
- ☐ Recommended
- ☐ Required

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43. Does the policy tool recommend or require periodic reviews?

- ☒ No
- ☐ Recommended
- ☐ Required

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45. Does the policy tool include mechanisms for enhancing policy or regulatory coordination with subnational governments (e.g. vertical coordination mechanisms such as appointing coordinating agencies, forming working groups, etc.)?

- ☒ No
- ☐ Yes

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47. Are there any government initiatives to enhance the capacity of targeted entities to implement or comply with the policy tool (e.g. industry working groups, outreach campaigns, education and training, etc.)?

- ☒ No
- ☐ Yes

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Domain-Specific Questions: Disclosure Questions

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**What is being disclosed?**

52. Are targeted entities recommended or required to disclose any of the following climate-related information? Select all that apply.

	Recommended	Required	Neither recommended nor required
1. Greenhouse gas (GHG) emissions	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. GHG emissions offsets or removals	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. GHG emissions reduction targets	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Other climate-related targets	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Physical climate risk	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Transition risk	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Transition plan	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### Disclosure of Greenhouse Gas (GHG) Emissions

54. Which GHG emissions must be disclosed? Select all that apply.

- ☒ Carbon dioxide (CO<sub>2</sub>)
- ☒ Methane (CH<sub>4</sub>)
- ☒ Nitrous oxide (N<sub>2</sub>O)
- ☒ Hydrofluorocarbons (HFCs)
- ☒ Perfluorocarbons (PFCs)
- ☒ Sulphur hexafluoride (SF<sub>6</sub>)
- ☒ Nitrogen trifluoride (NF<sub>3</sub>)
- ☒ Carbon dioxide equivalent (CO<sub>2</sub>e)

55. Are entities recommended or required to disclose gross emissions?

☒ No

☐ Recommended

☐ Required

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56. Are entities recommended or required to disclose net emissions?

☒ No

☐ Recommended

☐ Required

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57. What Scope of emissions must be disclosed? Select all that apply.

☐ Scope 1 emissions

☐ Scope 2 emissions

☐ Scope 3 emissions, relevant or material

☐ Scope 3 emissions, a specified proportion of coverage (Please describe)

☐ Scope 3 emissions, all

☒ Not specified

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58. Are entities recommended or required to disclose GHG emissions accounting methodologies or standards?

**No**

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59. Does the policy tool recommend or require the GHG inventory be third-party verified?

☒ No

☐ Recommended

☐ Required

60. If necessary, provide additional clarification to the above responses about greenhouse gas (GHG) emissions disclosure.

The publicly held companies must disclose if they prepare GHG emissions inventory and, if so, which scopes are covered and the weblink where additional information regarding the inventory can be found. This disclosure also follows the comply or explain requirements.

### Disclosure of Physical Risk

86. What types of physical risk must be disclosed?

☒ To company

☐ To society (double materiality)

87. What is the materiality standard for the disclosure of physical risk?

☒ Self-assessed material risk

☐ Externally-defined material risk

☐ Other (Describe)

88. Are entities recommended or required to disclose the results of climate risk-related stress tests that are related to physical climate risk?

☒ No

☐ Recommended

☐ Required

89. Are entities recommended or required to disclose their methodology for scenario analysis with relation to physical risk?

- ☒ No
  - ☐ Recommended
  - ☐ Required
- 
- 

90. Are risk assessments of physical risk recommended or required to be third-party verified?

- ☒ No
  - ☐ Recommended
  - ☐ Required
- 
- 

#### **Disclosure of Transition Risk**

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92. What types of transition risk must be disclosed? Select all that apply

- ☒ Risks that societal transitions may pose to the disclosing entity
  - ☐ Risks that the disclosing entity's transition may pose to society (double materiality)
- 
- 

93. What is the materiality standard for the disclosure of transition risk?

- ☒ Self-assessed material risk
  - ☐ Externally-defined material risk
  - ☐ Other (Describe)
- 
- 

94. Are entities recommended or required to disclose the results of climate-related risk stress tests that are related to transition risk?

- ☒ No



○ Recommended

○ Required

95. Are transition risk assessments recommended or required to be third-party verified?

☒ No

○ Recommended

○ Required

96. Are entities recommended or required to disclose their methodology for scenario analysis related to transition risk?

☒ No

○ Recommended

○ Required

#### Other disclosures

105. Are targeted entities recommended or required to disclose any other climate-related information? Select all that apply.

	Required	Recommended	Neither recommended nor required
1. Climate-related opportunities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Remuneration based on achieving climate-related goals	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Taxonomies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Capital allocation and/or expenditure plans (in the context of climate change)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

5. Due diligence	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Assumptions and Dependencies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Data limitations of scenario analyses	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Financial implications of climate-related matters (e.g., integration of climate-related disclosures into financial accounting standards)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Stewardship (e.g., whether stewardship codes are in place, how entities vote in shareholder meetings, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. ESG methodologies and criteria (in the case of service providers)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. Asset planning or ownership in the context of climate change	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12. Sectoral investment policies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13. Climate-related lobbying and/or policy engagement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14. Locked-in emissions or information on emissive assets with long lifespans	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
15. Dirty asset divestiture	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
16. Nature-related impacts	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
17. Just transition indicators	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

106. Is third-party verification of climate-related opportunities recommended or required?

☒ No

☐ Recommended

- Required

107. Describe and reference the section/subsection/paragraph of the policy tool relevant to disclosures regarding remuneration based on achieving climate-related goals.

Publicly-held companies must disclose key performance indicators linked to management's variable remuneration in the reference form, including ESG and climate aspects. Item 8.1, c, i.

## Standards, Frameworks, and Guidelines

125. Does the policy tool require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply.

	Required	Referenced	Neither required nor referenced
1. IFRS S1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. IFRS S2	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Task Force on Climate-related Financial Disclosures (TCFD)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. GHG Protocol Corporate Accounting and Reporting Standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. CDP (formerly known as Climate Disclosure Project) reporting framework	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. International Integrated Reporting Framework	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Global Reporting Initiative (GRI)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

9. Sustainability Accounting Standards Board (SASB)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. European Sustainability Reporting Standards (ESRS)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. Taskforce on Nature-related Financial Disclosures (TNFD)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12. Partnership for Carbon Accounting Financials (PCAF)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13. Glasgow Financial Alliance for Net Zero (GFANZ)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### Additional Important Information

197. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

None

## Policy Tool Name: Law No 14,904/2024

3. Source material link(s):

[https://web.archive.org/web/20240808200156/https://www.planalto.gov.br/ccivil\\_03/\\_ato2023-2026/2024/lei/L14904.htm](https://web.archive.org/web/20240808200156/https://www.planalto.gov.br/ccivil_03/_ato2023-2026/2024/lei/L14904.htm)

4. Which of the following governance domains does this policy tool relate to? Select all that apply.

☐ Climate-related disclosure

☒ Transition planning

☐ Public procurement

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6. Select the category which best describes the author/issuer of the policy tool.

☐ Head of state and/or government

☐ Independent regulatory or supervisory body

☒ Legislature

☐ Judiciary

☐ Ministry/Department/Agency

☐ Other (Please describe)

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7. Status of the policy tool

☒ Approved, in force

☐ Approved, not yet in force

☐ Other (Please describe)

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9. Year of (planned) entry into force or year of publication

2024

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10. Does the policy tool have an end date?

☒ No

☐ Yes

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12. Briefly describe the policy tool's goal and/or purpose:

For example: The policy tool requires publicly listed companies to comply with the recommendations of the Task Force for Climate Related Financial Disclosure or to explain the absence of such disclosures.

The Law establishes guidelines for the preparation of climate change adaptation plans, with the aim of implementing measures to reduce the vulnerability and exposure to risks of environmental, social, economic and infrastructure systems in the face of the current and expected adverse effects of climate change.

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13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.

☐ 1.

☐ 2.

☐ 3.

☐ 4.

☐ 5.

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25. Which entities are targeted through this policy tool? Select all that apply.

Note: With regard to sectoral actors, in cases where mandatory and voluntary obligations are mixed (e.g., mandatory for one sector, voluntary for another), select "mandatory" as there will be further opportunity to clarify.

	Mandatory	Voluntary	Not targeted
1. Publicly-traded entities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Private companies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3. Financial institutions	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Small and medium-sized enterprises	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. State-owned companies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Not-for-profit organizations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Government agencies and/or departments (supranational)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Government agencies and/or departments (national)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Government agencies and/or departments (regional - e.g., state, province, region, metropolitan region)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Government agencies and/or departments (local - e.g., county, district, municipality, city)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Government agencies and/or departments (unspecified)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12. Sectoral actors (e.g., healthcare, defense, utilities, education)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

27. Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory.

	Government agencies and/or departments (national)	Government agencies and/or departments (regional - e.g. state, province, region, metropolitan region)	Government agencies and/or departments (local - e.g. county, district, municipality, city)
Minimum number of employees (Enter min			

number of full-time employees - FTEs)			
Minimum revenue (Enter minimum revenue)			
Minimum assets (Enter minimum assets)			
Minimum contract value (Enter minimum contract value)			
Entity is headquartered in the jurisdiction			
Entities are subjected to disclosure or reporting requirements	The law does not define a threshold. It applies to all levels of government.	The law does not define a threshold. It applies to all levels of government.	The law does not define a threshold. It applies to all levels of government.

28. Can entities for whom compliance with the policy tool is mandatory opt out of the obligation (e.g. comply or explain)?

☒ No

☐ Yes

30. Does the policy tool exclusively apply to entities' domestic operations, or does it also apply to entities' operations beyond the jurisdiction?

☒ Operations within jurisdiction only

☐ Operations beyond the jurisdiction

☐ Not applicable

32. What are the sanctions for non-compliance? Select all that apply and describe in the text field.

☐ Monetary fine

☐ Restriction on business activities

☐ Voiding or setting aside of contract

☐ Exclusion from government contracts



- ☐ Award of damages or compensation
  - ☐ Penalty for senior managers
  - ☐ Criminal penalties
  - ☒ Not specified
  - ☐ Not applicable (e.g. in cases of voluntary tools)
  - ☐ Other
- 
- 

33. Relative to other compliance activities required of entities in this jurisdiction, is the cost of compliance:

- ☐ Below average
  - ☐ Average
  - ☐ Above average
  - ☐ Not applicable
  - ☒ Unknown or prefer not to answer
- 
- 

35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority.

- ☐ Below average
  - ☐ Average
  - ☐ Above average
  - ☐ Not applicable
  - ☒ Unknown or prefer not to answer
- 
- 

37. Have the climate-specific provisions in this instrument ever been enforced?

- ☒ No (If relevant, explain)
- ☐ Yes

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39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool?

☒ No

☐ Yes

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41. Does the policy tool recommend or require periodic impact assessments?

☐ No

☐ Recommended

☒ Required

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42. Select the option that best describes the frequency of periodic impact assessments recommended or required by the policy tool.

☐ 0-2 years

☒ 2-5 years

☐ 5-10 years

☐ 10 or more years

☐ Not specified

☐ Other

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43. Does the policy tool recommend or require periodic reviews?

☐ No

☐ Recommended

☒ Required

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44. Select the option that best describes the frequency of the recommended or required periodic reviews.

- ☐ 0-2 years
- ☒ 2-5 years
- ☐ 5-10 years
- ☐ 10 or more years
- ☐ Not specified
- ☐ Other

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45. Does the policy tool include mechanisms for enhancing policy or regulatory coordination with subnational governments (e.g. vertical coordination mechanisms such as appointing coordinating agencies, forming working groups, etc.)?

- ☒ No
- ☐ Yes

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47. Are there any government initiatives to enhance the capacity of targeted entities to implement or comply with the policy tool (e.g. industry working groups, outreach campaigns, education and training, etc.)?

- ☒ No
- ☐ Yes

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Domain-Specific Questions: Transition Planning Questions

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**Disclosure of Plans and Targets**

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132. Are targeted entities recommended or required to publicly disclose climate-related targets or transition plans?

- ☒ No
- ☐ Recommended
- ☐ Required

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Targets

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135. Does the policy tool recommend or require targeted entities to have or develop climate-related targets?

- ☒ No
- ☐ Recommended
- ☐ Required

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**Transition Plans**

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164. Does the policy tool recommend or require targeted entities to have or develop a transition plan?

- ☐ No
- ☐ Recommended
- ☒ Required

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165. Does the policy tool recommend or require any of the following elements or criteria for transition plans? Select all that apply.

	Recommended	Required	Neither recommended nor required
A timeframe for the transition plan (e.g. 10 year plan, 20 year plan, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Key Performance Indicators (KPIs) for monitoring transition plan implementation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Updates to the transition plan	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Third-party verification and/or audited accuracy of the transition plan	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Identified methodology for scenario analysis	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

168. Select the option that best describes the recommended or required frequency of updates to transition plans.

- ☐ 0-2 years
- ☒ 2-5 years
- ☐ 5-10 years
- ☐ 10 or more years
- ☐ Not specified
- ☐ Other

169. Describe the recommended or required updates to transition plans and reference the relevant section/subsection/paragraph of the policy tool.

Article 2 establishes that the guidelines for climate change adaptation plans include monitoring and evaluating planned actions, as well as the adoption of inclusive governance processes for reviewing the plans every 4 (four) years.

## Monitoring, Oversight, and Implementation

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176. Does the policy tool recommend or require entities undertake any of the following with regard to monitoring, oversight, and implementation? Select all that apply.

	Recommended	Required	No
Monitor progress in implementing their transition plan	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Develop financial plans for the implementation of their transition plan	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Integrate climate-related matters into their financial accounting	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Incorporate climate change considerations into their investment decision making and/or asset planning	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Incorporate climate change considerations into their capital allocation and/or expenditure plans	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Any other mechanisms for enhancing the achievement of targets and/or the implementation of transition plans	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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177. Describe the obligation to monitor progress in implementing transition plans, referencing the relevant section/subsection/paragraph of the policy tool.

Article 2 of the Law defines the guidelines for climate change adaptation plans, including: IX - monitoring and evaluation of planned actions, as well as the adoption of inclusive governance processes for reviewing the plans covered by the Law every 4 (four) years, guided by the cycle of multi-year plans; in addition to X - promoting research, development and innovation aimed at b) monitoring the impacts of adaptations adopted at local, municipal, state, regional and national levels.

Also, article 3, sole paragraph, establishes that the adaptation plans shall establish indicators for monitoring and evaluating their implementation.

## Engagement, Lobbying, and Governance

184. Does the policy tool recommend or require targeted entities align any of the following engagement and/or governance practices with their targets and/or transition plans?

	Recommended	Required	No
Value chain engagement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Investor engagement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Consumer engagement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Policy engagement and lobbying practices	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Corporate governance structure for transition and verification	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Climate-related financial incentives for employees and board members	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

185. Does the policy tool recommend or require targeted entities to disclose how they have used due diligence and/or stewardship to achieve their targets and/or implement their transition plans?

- ☒ No
- ☐ Recommended
- ☐ Required

## Standards, Frameworks, and Guidelines

194. Does the policy tool require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply.

	Required	Referenced	Neither required nor referenced
IFRS S1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IFRS S2	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Task Force on Climate-related Financial Disclosures (TCFD)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
CDP (formerly known as Climate Disclosure Project) Technical Note: Reporting on Climate Transition Plans	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
International Integrated Reporting Framework	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Global Reporting Initiative (GRI)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sustainability Accounting Standards Board (SASB)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Science Based Targets initiative (SBTi)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Science Based Targets initiative (SBTi) Net Zero Standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
European Sustainability Reporting Standards (ESRS)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Additional Important Information

197. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

None



## Policy Tool Name: SUSEP Circular No. 666

3. Source material link(s):

<https://web.archive.org/web/20240823011335/https://www2.susep.gov.br/safe/scripts/bnweb/bnmapr.exe?router=upload/26128>

4. Which of the following governance domains does this policy tool relate to? Select all that apply.

☒ Climate-related disclosure

☐ Transition planning

☐ Public procurement

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6. Select the category which best describes the author/issuer of the policy tool.

☐ Head of state and/or government

☒ Independent regulatory or supervisory body

☐ Legislature

☐ Judiciary

☐ Ministry/Department/Agency

☒ Other (Please describe) Superintendency of Private Insurance (SUSEP)

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7. Status of the policy tool

☐ Approved, in force

☐ Approved, not yet in force

☒ Other (Please describe)

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9. Year of (planned) entry into force or year of publication

2022

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10. Does the policy tool have an end date?

☒ No

☐ Yes

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12. Briefly describe the policy tool's goal and/or purpose:

For example: The policy tool requires publicly listed companies to comply with the recommendations of the Task Force for Climate Related Financial Disclosure or to explain the absence of such disclosures.

Circular establishes mechanisms for mapping and managing sustainability risks by insurance companies, open supplementary pension entities (EAPCs), capitalization companies and local reinsurers.

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13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.

☒ 1. Superintendency of Private Insurance (SUSEP)

☐ 2.

☐ 3.

☐ 4.

☐ 5.

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15. To provide contextual information, rate the capacity of Superintendency of Private Insurance (SUSEP) to undertake the policy tool's implementation and/or enforcement.

☐ 0- No Capacity (Please explain)

☐ 1- Low Capacity (Please explain)

☐ 2- Medium Capacity (Please explain)

☒ 3- High Capacity (Please explain) SUSEP is the government body responsible for overseeing the insurance and reinsurance regulation in Brazil and has full authority to enforce its regulation and prosecute the market players on its matters.

☐ Prefer not to answer

- Not Applicable

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25. Which entities are targeted through this policy tool? Select all that apply.

Note: With regard to sectoral actors, in cases where mandatory and voluntary obligations are mixed (e.g., mandatory for one sector, voluntary for another), select "mandatory" as there will be further opportunity to clarify.

	Mandatory	Voluntary	Not targeted
1. Publicly-traded entities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Private companies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Financial institutions	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Small and medium-sized enterprises	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. State-owned companies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Not-for-profit organizations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Government agencies and/or departments (supranational)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Government agencies and/or departments (national)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Government agencies and/or departments (regional - e.g., state, province, region, metropolitan region)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. Government agencies and/or departments (local - e.g., county, district, municipality, city)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. Government agencies and/or departments (unspecified)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12. Sectoral actors (e.g., healthcare, defense, utilities, education)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

13. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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26. In cases where entities are targeted by sector, identify the sector to which the policy tool applies.

	Mandatory	Voluntary	Not applicable
All sectors	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Agriculture, forestry, and fishing	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Mining and quarrying	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Manufacturing	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Electricity, gas, steam, and air conditioning supply	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Water supply; sewerage; waste management and remediation activities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Construction	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Wholesale and retail trade; repair of motor vehicles and motorcycles	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Transportation and storage	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Accommodation and food service activities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Information and communication	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Financial and insurance activities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Real estate activities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Professional, scientific and technical activities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Administrative and support service activities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Public administration and defense; compulsory social security	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Education	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Human health and social work activities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Arts, entertainment and recreation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other service activities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Activities of households as employers; undifferentiated goods-and services-producing activities of households for own use	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Activities of extraterritorial organizations and bodies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

27. Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory.

	Sectoral actors (e.g. healthcare, defense, utilities, education)
Minimum number of employees (Enter min number of full-time employees - FTEs)	
Minimum revenue (Enter minimum revenue)	
Minimum assets (Enter minimum assets)	
Minimum contract value (Enter minimum contract value)	
Entity is headquartered in the jurisdiction	
Entities are subjected to disclosure or reporting requirements	The regulation is applicable to all insurance and reinsurance companies.

28. Can entities for whom compliance with the policy tool is mandatory opt out of the obligation (e.g. comply or explain)?

☐ No

☒ Yes

29. Describe the available opt-out provisions (e.g. “comply or explain”), referencing the relevant section/subsection/paragraph of the policy tool.

Pursuant to paragraph 2, article 3 of the Circular No. 666, insurance and reinsurance companies' operations whose sustainability risks are considered immaterial are exempted from the sustainability

risk management requirements. However, all companies must disclose a sustainability policy and an annual report.

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30. Does the policy tool exclusively apply to entities' domestic operations, or does it also apply to entities' operations beyond the jurisdiction?

- ☐ Operations within jurisdiction only
  - ☐ Operations beyond the jurisdiction
  - ☒ Not applicable
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- 

32. What are the sanctions for non-compliance? Select all that apply and describe in the text field.

- ☐ Monetary fine
  - ☐ Restriction on business activities
  - ☐ Voiding or setting aside of contract
  - ☐ Exclusion from government contracts
  - ☐ Award of damages or compensation
  - ☐ Penalty for senior managers
  - ☐ Criminal penalties
  - ☒ Not specified
  - ☐ Not applicable (e.g. in cases of voluntary tools)
  - ☐ Other
- 
- 

33. Relative to other compliance activities required of entities in this jurisdiction, is the cost of compliance:

- ☐ Below average
- ☐ Average
- ☐ Above average
- ☐ Not applicable

☒ Unknown or prefer not to answer

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35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority.

☐ Below average

☐ Average

☐ Above average

☐ Not applicable

☒ Unknown or prefer not to answer

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37. Have the climate-specific provisions in this instrument ever been enforced?

☒ No (If relevant, explain)

☐ Yes

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39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool?

☒ No

☐ Yes

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41. Does the policy tool recommend or require periodic impact assessments?

☒ No

☐ Recommended

☐ Required

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43. Does the policy tool recommend or require periodic reviews?

- ☐ No
- ☐ Recommended
- ☒ Required

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44. Select the option that best describes the frequency of the recommended or required periodic reviews.

- ☐ 0-2 years
- ☒ 2-5 years
- ☐ 5-10 years
- ☐ 10 or more years
- ☐ Not specified
- ☐ Other

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45. Does the policy tool include mechanisms for enhancing policy or regulatory coordination with subnational governments (e.g. vertical coordination mechanisms such as appointing coordinating agencies, forming working groups, etc.)?

- ☒ No
- ☐ Yes

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47. Are there any government initiatives to enhance the capacity of targeted entities to implement or comply with the policy tool (e.g. industry working groups, outreach campaigns, education and training, etc.)?

- ☒ No
- ☐ Yes

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## Domain-Specific Questions: Disclosure Questions

### What is being disclosed?

52. Are targeted entities recommended or required to disclose any of the following climate-related information? Select all that apply.

	Recommended	Required	Neither recommended nor required
1. Greenhouse gas (GHG) emissions	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. GHG emissions offsets or removals	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. GHG emissions reduction targets	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Other climate-related targets	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Physical climate risk	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Transition risk	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Transition plan	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Disclosure of Physical Risk

86. What types of physical risk must be disclosed?

☒ To company

☐ To society (double materiality)

87. What is the materiality standard for the disclosure of physical risk?

☒ Self-assessed material risk

☐ Externally-defined material risk

○ Other (Describe)

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88. Are entities recommended or required to disclose the results of climate risk-related stress tests that are related to physical climate risk?

☒ No

○ Recommended

○ Required

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89. Are entities recommended or required to disclose their methodology for scenario analysis with relation to physical risk?

☒ No

○ Recommended

○ Required

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90. Are risk assessments of physical risk recommended or required to be third-party verified?

☒ No

○ Recommended

○ Required

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### Disclosure of Transition Risk

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92. What types of transition risk must be disclosed? Select all that apply

☒ Risks that societal transitions may pose to the disclosing entity

☐ Risks that the disclosing entity's transition may pose to society (double materiality)

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93. What is the materiality standard for the disclosure of transition risk?

- ☒ Self-assessed material risk
  - ☐ Externally-defined material risk
  - ☐ Other (Describe)
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94. Are entities recommended or required to disclose the results of climate-related risk stress tests that are related to transition risk?

- ☒ No
  - ☐ Recommended
  - ☐ Required
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95. Are transition risk assessments recommended or required to be third-party verified?

- ☒ No
  - ☐ Recommended
  - ☐ Required
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96. Are entities recommended or required to disclose their methodology for scenario analysis related to transition risk?

- ☒ No
  - ☐ Recommended
  - ☐ Required
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**Other disclosures**

105. Are targeted entities recommended or required to disclose any other climate-related information? Select all that apply.

	Required	Recommended	Neither recommended nor required
1. Climate-related opportunities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Remuneration based on achieving climate-related goals	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Taxonomies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Capital allocation and/or expenditure plans (in the context of climate change)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Due diligence	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Assumptions and Dependencies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Data limitations of scenario analyses	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Financial implications of climate-related matters (e.g., integration of climate-related disclosures into financial accounting standards)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Stewardship (e.g., whether stewardship codes are in place, how entities vote in shareholder meetings, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. ESG methodologies and criteria (in the case of service providers)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. Asset planning or ownership in the context of climate change	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12. Sectoral investment policies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

13. Climate-related lobbying and/or policy engagement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14. Locked-in emissions or information on emissive assets with long lifespans	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
15. Dirty asset divestiture	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
16. Nature-related impacts	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
17. Just transition indicators	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

106. Is third-party verification of climate-related opportunities recommended or required?

- ☒ No
- ☐ Recommended
- ☐ Required

### Standards, Frameworks, and Guidelines

125. Does the policy tool require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply.

	Required	Referenced	Neither required nor referenced
1. IFRS S1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. IFRS S2	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Task Force on Climate-related Financial Disclosures (TCFD)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. GHG Protocol Corporate Accounting and Reporting Standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

5. GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. CDP (formerly known as Climate Disclosure Project) reporting framework	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. International Integrated Reporting Framework	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Global Reporting Initiative (GRI)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Sustainability Accounting Standards Board (SASB)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. European Sustainability Reporting Standards (ESRS)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. Taskforce on Nature-related Financial Disclosures (TNFD)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12. Partnership for Carbon Accounting Financials (PCAF)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13. Glasgow Financial Alliance for Net Zero (GFANZ)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Additional Important Information

197. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

None

## Policy Tool Name: Brazilian Central Bank Resolution No. 151

3. Source material link(s):

<https://web.archive.org/web/20240825153051/https://www.bcb.gov.br/estabilidadefinanceira/exibenormativo?tipo=Resolu%C3%A7%C3%A3o%20BCB&numero=151>

4. Which of the following governance domains does this policy tool relate to? Select all that apply.

☒ Climate-related disclosure

☐ Transition planning

☐ Public procurement

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6. Select the category which best describes the author/issuer of the policy tool.

☐ Head of state and/or government

☐ Independent regulatory or supervisory body

☐ Legislature

☐ Judiciary

☐ Ministry/Department/Agency

☒ Other (Please describe) Brazilian Central Bank

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7. Status of the policy tool

☒ Approved, in force

☐ Approved, not yet in force

☐ Other (Please describe)

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9. Year of (planned) entry into force or year of publication

2021

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10. Does the policy tool have an end date?

☒ No

☐ Yes

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12. Briefly describe the policy tool's goal and/or purpose:

For example: The policy tool requires publicly listed companies to comply with the recommendations of the Task Force for Climate Related Financial Disclosure or to explain the absence of such disclosures.

The BCB Resolution provides for the submission of information related to social, environmental, and climate risks as addressed in other BCB resolutions.

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13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.

☒ 1. Brazilian Central Bank

☐ 2.

☐ 3.

☐ 4.

☐ 5.

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15. To provide contextual information, rate the capacity of Brazilian Central Bank to undertake the policy tool's implementation and/or enforcement.

☐ 0- No Capacity (Please explain)

☐ 1- Low Capacity (Please explain)

☐ 2- Medium Capacity (Please explain)

☒ 3- High Capacity (Please explain) The BCB is the government body responsible for overseeing the financial and banking regulation in Brazil and has full authority to enforce its regulation and prosecute the market players on its matters.

☐ Prefer not to answer



- Not Applicable

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25. Which entities are targeted through this policy tool? Select all that apply.

Note: With regard to sectoral actors, in cases where mandatory and voluntary obligations are mixed (e.g., mandatory for one sector, voluntary for another), select "mandatory" as there will be further opportunity to clarify.

	Mandatory	Voluntary	Not targeted
1. Publicly-traded entities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Private companies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Financial institutions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Small and medium-sized enterprises	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. State-owned companies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Not-for-profit organizations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Government agencies and/or departments (supranational)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Government agencies and/or departments (national)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Government agencies and/or departments (regional - e.g., state, province, region, metropolitan region)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. Government agencies and/or departments (local - e.g., county, district, municipality, city)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. Government agencies and/or departments (unspecified)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12. Sectoral actors (e.g., healthcare, defense, utilities, education)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

13. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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27. Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory.

	Financial institutions
Minimum number of employees (Enter min number of full-time employees - FTEs)	
Minimum revenue (Enter minimum revenue)	
Minimum assets (Enter minimum assets)	
Minimum contract value (Enter minimum contract value)	
Entity is headquartered in the jurisdiction	
Entities are subjected to disclosure or reporting requirements	The regulation is applicable to almost all financial companies, except for those classified in the s5 segment considered by the BCB as having a simplified risk profile .

28. Can entities for whom compliance with the policy tool is mandatory opt out of the obligation (e.g. comply or explain)?

☒ No

☐ Yes

30. Does the policy tool exclusively apply to entities' domestic operations, or does it also apply to entities' operations beyond the jurisdiction?

☐ Operations within jurisdiction only

☐ Operations beyond the jurisdiction

☒ Not applicable

32. What are the sanctions for non-compliance? Select all that apply and describe in the text field.

☐ Monetary fine

☐ Restriction on business activities

- ☐ Voiding or setting aside of contract
- ☐ Exclusion from government contracts
- ☐ Award of damages or compensation
- ☐ Penalty for senior managers
- ☐ Criminal penalties
- ☒ Not specified
- ☐ Not applicable (e.g. in cases of voluntary tools)
- ☐ Other

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33. Relative to other compliance activities required of entities in this jurisdiction, is the cost of compliance:

- ☐ Below average
- ☐ Average
- ☐ Above average
- ☐ Not applicable
- ☒ Unknown or prefer not to answer

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35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority.

- ☐ Below average
- ☐ Average
- ☐ Above average
- ☐ Not applicable
- ☒ Unknown or prefer not to answer

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37. Have the climate-specific provisions in this instrument ever been enforced?

☒ No (If relevant, explain)

☐ Yes

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39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool?

☒ No

☐ Yes

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41. Does the policy tool recommend or require periodic impact assessments?

☒ No

☐ Recommended

☐ Required

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43. Does the policy tool recommend or require periodic reviews?

☒ No

☐ Recommended

☐ Required

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45. Does the policy tool include mechanisms for enhancing policy or regulatory coordination with subnational governments (e.g. vertical coordination mechanisms such as appointing coordinating agencies, forming working groups, etc.)?

☒ No

☐ Yes

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47. Are there any government initiatives to enhance the capacity of targeted entities to implement or comply with the policy tool (e.g. industry working groups, outreach campaigns, education and training, etc.)?

- ☒ No
- ☐ Yes

Domain-Specific Questions: Disclosure Questions

What is being disclosed?

52. Are targeted entities recommended or required to disclose any of the following climate-related information? Select all that apply.

	Recommended	Required	Neither recommended nor required
1. Greenhouse gas (GHG) emissions	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. GHG emissions offsets or removals	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. GHG emissions reduction targets	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Other climate-related targets	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Physical climate risk	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Transition risk	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Transition plan	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Disclosure of Greenhouse Gas (GHG) Emissions

54. Which GHG emissions must be disclosed? Select all that apply.

- ☒ Carbon dioxide (CO<sub>2</sub>)

- ☒ Methane (CH<sub>4</sub>)
  - ☒ Nitrous oxide (N<sub>2</sub>O)
  - ☒ Hydrofluorocarbons (HFCs)
  - ☒ Perfluorocarbons (PFCs)
  - ☒ Sulphur hexafluoride (SF<sub>6</sub>)
  - ☒ Nitrogen trifluoride (NF<sub>3</sub>)
  - ☒ Carbon dioxide equivalent (CO<sub>2</sub>e)
- 
- 

55. Are entities recommended or required to disclose gross emissions?

- ☐ No
  - ☐ Recommended
  - ☒ Required
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56. Are entities recommended or required to disclose net emissions?

- ☐ No
  - ☐ Recommended
  - ☒ Required
- 
- 

57. What Scope of emissions must be disclosed? Select all that apply.

- ☐ Scope 1 emissions
- ☐ Scope 2 emissions
- ☐ Scope 3 emissions, relevant or material
- ☐ Scope 3 emissions, a specified proportion of coverage (Please describe)
- ☐ Scope 3 emissions, all
- ☒ Not specified

58. Are entities recommended or required to disclose GHG emissions accounting methodologies or standards?

#### GHG emissions

59. Does the policy tool recommend or require the GHG inventory be third-party verified?

- ☒ No
- ☐ Recommended
- ☐ Required

60. If necessary, provide additional clarification to the above responses about greenhouse gas (GHG) emissions disclosure.

The Resolution establishes that the financial institutions shall report information on the emission, neutralization and absorption of greenhouse gases, without indicating scope or specific gases.

#### Disclosure of Greenhouse Gas (GHG) Offsets or Removals

62. Does the policy tool recommend or require offsetting purchases be disclosed?

- ☐ No
- ☐ Recommended (Please describe and reference the relevant section/subsection/paragraph of the policy tool)
- ☒ Required (Please describe and reference the relevant section/subsection/paragraph of the policy tool) The Resolution requires to inform about GHG neutralization (Art. 2. IX)

63. Does the policy tool recommend or require entities disclose whether offsets are verified?

☒ No

☐ Recommended (Please describe and reference the relevant section/subsection/paragraph of the policy tool)

☐ Required (Please describe and reference the relevant section/subsection/paragraph of the policy tool)

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64. Does the policy tool recommend or require any certification standards for the use of GHG offsetting or removals?

☒ No

☐ Recommended (Please list the certification standards, describe their use, and reference the relevant section/subsection/paragraph of the policy tool)

☐ Required (Please describe and reference the relevant section/subsection/paragraph of the policy tool)

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65. Does the policy tool include any other recommendations or requirements regarding the appropriate use of offsets?

☒ No

☐ Recommended (Please describe and reference the relevant section/subsection/paragraph of the policy tool)

☐ Required (Please describe and reference the relevant section/subsection/paragraph of the policy tool)

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### Disclosure of Physical Risk

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86. What types of physical risk must be disclosed?

☒ To company

☐ To society (double materiality)



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87. What is the materiality standard for the disclosure of physical risk?

- ☒ Self-assessed material risk
  - ☐ Externally-defined material risk
  - ☐ Other (Describe)
- -----

88. Are entities recommended or required to disclose the results of climate risk-related stress tests that are related to physical climate risk?

- ☐ No
  - ☐ Recommended
  - ☒ Required
- -----

89. Are entities recommended or required to disclose their methodology for scenario analysis with relation to physical risk?

- ☒ No
  - ☐ Recommended
  - ☐ Required
- -----

90. Are risk assessments of physical risk recommended or required to be third-party verified?

- ☒ No
  - ☐ Recommended
  - ☐ Required
- -----

## Disclosure of Transition Risk

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92. What types of transition risk must be disclosed? Select all that apply

- ☒ Risks that societal transitions may pose to the disclosing entity
  - ☐ Risks that the disclosing entity's transition may pose to society (double materiality)
- -----

93. What is the materiality standard for the disclosure of transition risk?

- ☒ Self-assessed material risk
  - ☐ Externally-defined material risk
  - ☐ Other (Describe)
- -----

94. Are entities recommended or required to disclose the results of climate-related risk stress tests that are related to transition risk?

- ☐ No
  - ☐ Recommended
  - ☒ Required
- -----

95. Are transition risk assessments recommended or required to be third-party verified?

- ☒ No
  - ☐ Recommended
  - ☐ Required
- -----

96. Are entities recommended or required to disclose their methodology for scenario analysis related to transition risk?

- ☒ No
- ☐ Recommended

- Required

## Other disclosures

105. Are targeted entities recommended or required to disclose any other climate-related information? Select all that apply.

	Required	Recommended	Neither recommended nor required
1. Climate-related opportunities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Remuneration based on achieving climate-related goals	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Taxonomies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Capital allocation and/or expenditure plans (in the context of climate change)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Due diligence	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Assumptions and Dependencies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Data limitations of scenario analyses	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Financial implications of climate-related matters (e.g., integration of climate-related disclosures into financial accounting standards)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Stewardship (e.g., whether stewardship codes are in place, how entities vote in shareholder meetings, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. ESG methodologies and criteria (in the case of service providers)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

11. Asset planning or ownership in the context of climate change	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12. Sectoral investment policies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13. Climate-related lobbying and/or policy engagement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14. Locked-in emissions or information on emissive assets with long lifespans	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
15. Dirty asset divestiture	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
16. Nature-related impacts	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
17. Just transition indicators	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Standards, Frameworks, and Guidelines

125. Does the policy tool require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply.


	Required	Referenced	Neither required nor referenced
1. IFRS S1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. IFRS S2	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Task Force on Climate-related Financial Disclosures (TCFD)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. GHG Protocol Corporate Accounting and Reporting Standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

6. CDP (formerly known as Climate Disclosure Project) reporting framework	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. International Integrated Reporting Framework	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Global Reporting Initiative (GRI)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Sustainability Accounting Standards Board (SASB)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. European Sustainability Reporting Standards (ESRS)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. Taskforce on Nature-related Financial Disclosures (TNFD)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12. Partnership for Carbon Accounting Financials (PCAF)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13. Glasgow Financial Alliance for Net Zero (GFANZ)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### Additional Important Information

128. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

#### Additional Important Information



197. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

None

## Policy Tool Name: Brazilian Central Bank Resolution No. 139

3. Source material link(s):

<https://web.archive.org/web/20240825185458/https://www.bcb.gov.br/estabilidadefinanceira/exibenormativo?tipo=Resolu%C3%A7%C3%A3o%20BCB&numero=139>

4. Which of the following governance domains does this policy tool relate to? Select all that apply.

☒ Climate-related disclosure

☐ Transition planning

☐ Public procurement

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6. Select the category which best describes the author/issuer of the policy tool.

☐ Head of state and/or government

☐ Independent regulatory or supervisory body

☐ Legislature

☐ Judiciary

☐ Ministry/Department/Agency

☒ Other (Please describe) Brazilian Central Bank

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7. Status of the policy tool

☒ Approved, in force

☐ Approved, not yet in force

☐ Other (Please describe)

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9. Year of (planned) entry into force or year of publication

2021

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10. Does the policy tool have an end date?

☒ No

☐ Yes

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12. Briefly describe the policy tool's goal and/or purpose:

For example: The policy tool requires publicly listed companies to comply with the recommendations of the Task Force for Climate Related Financial Disclosure or to explain the absence of such disclosures.

The BCB Normative Instruction provides for the disclosure of the Social, Environmental, and Climate Risks and Opportunities Report.

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13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.

☒ 1. Brazilian Central Bank

☐ 2.

☐ 3.

☐ 4.

☐ 5.

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15. To provide contextual information, rate the capacity of Brazilian Central Bank to undertake the policy tool's implementation and/or enforcement.

☐ 0- No Capacity (Please explain)

☐ 1- Low Capacity (Please explain)

☐ 2- Medium Capacity (Please explain)

☒ 3- High Capacity (Please explain) The BCB is the government body responsible for overseeing the financial and banking regulation in Brazil and has full authority to enforce its regulation and prosecute the market players on its matters.

☐ Prefer not to answer



- Not Applicable

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25. Which entities are targeted through this policy tool? Select all that apply.

Note: With regard to sectoral actors, in cases where mandatory and voluntary obligations are mixed (e.g., mandatory for one sector, voluntary for another), select "mandatory" as there will be further opportunity to clarify.

	Mandatory	Voluntary	Not targeted
1. Publicly-traded entities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Private companies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Financial institutions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Small and medium-sized enterprises	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. State-owned companies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Not-for-profit organizations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Government agencies and/or departments (supranational)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Government agencies and/or departments (national)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Government agencies and/or departments (regional - e.g., state, province, region, metropolitan region)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. Government agencies and/or departments (local - e.g., county, district, municipality, city)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. Government agencies and/or departments (unspecified)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12. Sectoral actors (e.g., healthcare, defense, utilities, education)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

13. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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27. Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory.

	Financial institutions
Minimum number of employees (Enter min number of full-time employees - FTEs)	
Minimum revenue (Enter minimum revenue)	
Minimum assets (Enter minimum assets)	
Minimum contract value (Enter minimum contract value)	
Entity is headquartered in the jurisdiction	
Entities are subjected to disclosure or reporting requirements	The regulation is applicable to almost all financial companies, except for those classified in the s5 segment considered by the BCB as having a simplified risk profile.

28. Can entities for whom compliance with the policy tool is mandatory opt out of the obligation (e.g. comply or explain)?

- ☐ No
- ☒ Yes

29. Describe the available opt-out provisions (e.g. “comply or explain”), referencing the relevant section/subsection/paragraph of the policy tool.

In exceptional cases where the disclosure of information required in the report violates confidentiality or intellectual property clauses, the corresponding specific item may not be disclosed, provided that it is justified.

30. Does the policy tool exclusively apply to entities’ domestic operations, or does it also apply to entities’ operations beyond the jurisdiction?

- ☐ Operations within jurisdiction only
- ☐ Operations beyond the jurisdiction

☒ Not applicable

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32. What are the sanctions for non-compliance? Select all that apply and describe in the text field.

- ☐ Monetary fine
  - ☐ Restriction on business activities
  - ☐ Voiding or setting aside of contract
  - ☐ Exclusion from government contracts
  - ☐ Award of damages or compensation
  - ☐ Penalty for senior managers
  - ☐ Criminal penalties
  - ☒ Not specified
  - ☐ Not applicable (e.g. in cases of voluntary tools)
  - ☐ Other
- 
- 

33. Relative to other compliance activities required of entities in this jurisdiction, is the cost of compliance:

- ☐ Below average
  - ☐ Average
  - ☐ Above average
  - ☐ Not applicable
  - ☒ Unknown or prefer not to answer
- 
- 

35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority.

- ☐ Below average
- ☐ Average

- ☐ Above average
- ☐ Not applicable
- ☒ Unknown or prefer not to answer

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37. Have the climate-specific provisions in this instrument ever been enforced?

- ☒ No (If relevant, explain)
- ☐ Yes

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39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool?

- ☒ No
- ☐ Yes

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41. Does the policy tool recommend or require periodic impact assessments?

- ☒ No
- ☐ Recommended
- ☐ Required

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43. Does the policy tool recommend or require periodic reviews?

- ☐ No
- ☐ Recommended
- ☒ Required

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44. Select the option that best describes the frequency of the recommended or required periodic reviews.

- ☒ 0-2 years
- ☐ 2-5 years
- ☐ 5-10 years
- ☐ 10 or more years
- ☐ Not specified
- ☐ Other

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45. Does the policy tool include mechanisms for enhancing policy or regulatory coordination with subnational governments (e.g. vertical coordination mechanisms such as appointing coordinating agencies, forming working groups, etc.)?

- ☒ No
- ☐ Yes

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47. Are there any government initiatives to enhance the capacity of targeted entities to implement or comply with the policy tool (e.g. industry working groups, outreach campaigns, education and training, etc.)?

- ☒ No
- ☐ Yes

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Domain-Specific Questions: Disclosure Questions

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**What is being disclosed?**

52. Are targeted entities recommended or required to disclose any of the following climate-related information? Select all that apply.

	Recommended	Required	Neither recommended nor required
1. Greenhouse gas (GHG) emissions	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. GHG emissions offsets or removals	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. GHG emissions reduction targets	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Other climate-related targets	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Physical climate risk	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Transition risk	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Transition plan	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Disclosure of Physical Risk

86. What types of physical risk must be disclosed?

- ☒ To company
- ☐ To society (double materiality)

87. What is the materiality standard for the disclosure of physical risk?

- ☒ Self-assessed material risk
- ☐ Externally-defined material risk
- ☐ Other (Describe)

88. Are entities recommended or required to disclose the results of climate risk-related stress tests that are related to physical climate risk?

- ☐ No
- ☐ Recommended

☒ Required

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89. Are entities recommended or required to disclose their methodology for scenario analysis with relation to physical risk?

☐ No

☒ Recommended

☐ Required

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90. Are risk assessments of physical risk recommended or required to be third-party verified?

☒ No

☐ Recommended

☐ Required

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#### **Disclosure of Transition Risk**

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92. What types of transition risk must be disclosed? Select all that apply

☒ Risks that societal transitions may pose to the disclosing entity

☐ Risks that the disclosing entity's transition may pose to society (double materiality)

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93. What is the materiality standard for the disclosure of transition risk?

☒ Self-assessed material risk

☐ Externally-defined material risk

☐ Other (Describe)

-----

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94. Are entities recommended or required to disclose the results of climate-related risk stress tests that are related to transition risk?

- ☐ No
  - ☐ Recommended
  - ☒ Required
- 
- 

95. Are transition risk assessments recommended or required to be third-party verified?

- ☒ No
  - ☐ Recommended
  - ☐ Required
- 
- 

96. Are entities recommended or required to disclose their methodology for scenario analysis related to transition risk?

- ☐ No
  - ☒ Recommended
  - ☐ Required
- 
- 

#### Other disclosures

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105. Are targeted entities recommended or required to disclose any other climate-related information? Select all that apply.

	Required	Recommended	Neither recommended nor required
1. Climate-related opportunities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Remuneration based on achieving climate-related goals	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



3. Taxonomies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Capital allocation and/or expenditure plans (in the context of climate change)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Due diligence	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Assumptions and Dependencies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Data limitations of scenario analyses	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Financial implications of climate-related matters (e.g., integration of climate-related disclosures into financial accounting standards)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Stewardship (e.g., whether stewardship codes are in place, how entities vote in shareholder meetings, etc.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. ESG methodologies and criteria (in the case of service providers)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. Asset planning or ownership in the context of climate change	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12. Sectoral investment policies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13. Climate-related lobbying and/or policy engagement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14. Locked-in emissions or information on emissive assets with long lifespans	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
15. Dirty asset divestiture	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
16. Nature-related impacts	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. Just transition indicators	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

106. Is third-party verification of climate-related opportunities recommended or required?

- ☒ No
- ☐ Recommended
- ☐ Required

111. Describe and reference the section/subsection/paragraph of the policy tool relevant to assumptions and dependencies disclosures.

The BCB Resolution No. 153 establishes standardized tables for the purposes of publishing the Social, Environmental and Climate Risks and Opportunities Report and in one of the tables is required to describe all the criteria adopted.

112. Describe and reference the section/subsection/paragraph of the policy tool relevant to data limitation disclosures.

The BCB Resolution No. 153 establishes standardized tables for the purposes of publishing the Social, Environmental and Climate Risks and Opportunities Report and in one of the tables is required to describe all the criteria adopted.

114. Describe and reference the section/subsection/paragraph of the policy tool relevant to stewardship-related disclosures.

The BCB Resolution No. 153 establishes standardized tables for the purposes of publishing the Social, Environmental and Climate Risks and Opportunities Report and in one of the tables is required to disclose information regarding the governance bodies responsibilities and procedures to assess risks and opportunities related to social, environmental and climate aspects.

122. Describe and reference the section/subsection/paragraph of the policy tool relevant to disclosure of nature-related impacts.

BCB Normative Instruction No. 139 also includes the environmental aspects.



### Additional Important Information

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197. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

None

## Policy Tool Name: Law No. 12,187/2009

3. Source material link(s):

[https://web.archive.org/web/20240808134950/https://www.planalto.gov.br/ccivil\\_03/\\_ato2007-2010/2009/lei/l12187.htm](https://web.archive.org/web/20240808134950/https://www.planalto.gov.br/ccivil_03/_ato2007-2010/2009/lei/l12187.htm)

4. Which of the following governance domains does this policy tool relate to? Select all that apply.

☐ Climate-related disclosure

☒ Transition planning

☐ Public procurement

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6. Select the category which best describes the author/issuer of the policy tool.

☐ Head of state and/or government

☐ Independent regulatory or supervisory body

☒ Legislature

☐ Judiciary

☐ Ministry/Department/Agency

☐ Other (Please describe)

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7. Status of the policy tool

☒ Approved, in force

☐ Approved, not yet in force

☐ Other (Please describe)

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9. Year of (planned) entry into force or year of publication

2009

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10. Does the policy tool have an end date?

☒ No

☐ Yes

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12. Briefly describe the policy tool's goal and/or purpose:

For example: The policy tool requires publicly listed companies to comply with the recommendations of the Task Force for Climate Related Financial Disclosure or to explain the absence of such disclosures.

The Law establishes the National Policy on Climate Change (PNMC) which establishes principles, objectives, guidelines and instruments necessary for its execution with the aim of making economic and social development compatible with the protection of the climate system.

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13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.

☐ 1.

☐ 2.

☐ 3.

☐ 4.

☐ 5.

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25. Which entities are targeted through this policy tool? Select all that apply.

Note: With regard to sectoral actors, in cases where mandatory and voluntary obligations are mixed (e.g., mandatory for one sector, voluntary for another), select "mandatory" as there will be further opportunity to clarify.

	Mandatory	Voluntary	Not targeted
1. Publicly-traded entities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Private companies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Financial institutions	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4. Small and medium-sized enterprises	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. State-owned companies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Not-for-profit organizations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Government agencies and/or departments (supranational)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Government agencies and/or departments (national)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Government agencies and/or departments (regional - e.g., state, province, region, metropolitan region)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Government agencies and/or departments (local - e.g., county, district, municipality, city)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Government agencies and/or departments (unspecified)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Sectoral actors (e.g., healthcare, defense, utilities, education)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

26. In cases where entities are targeted by sector, identify the sector to which the policy tool applies.

	Mandatory	Voluntary	Not applicable
All sectors	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Agriculture, forestry, and fishing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mining and quarrying	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Manufacturing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Electricity, gas, steam, and air conditioning supply	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Water supply; sewerage; waste management and remediation activities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Construction	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Wholesale and retail trade; repair of motor vehicles and motorcycles	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Transportation and storage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Accommodation and food service activities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Information and communication	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Financial and insurance activities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Real estate activities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Professional, scientific and technical activities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Administrative and support service activities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public administration and defense; compulsory social security	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Education	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Human health and social work activities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Arts, entertainment and recreation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other service activities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Activities of households as employers; undifferentiated goods-and services-producing activities of households for own use	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Activities of extraterritorial organizations and bodies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

27. Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory.

	State-owned companies	Government agencies and/or departments (supranational)	Government agencies and/or departments (national)	Government agencies and/or departments (regional - e.g. state, province, region, metropolitan region)	Government agencies and/or departments (local - e.g. county, district, municipality, city)	Government agencies and/or departments (unspecified)	Sectoral actors (e.g. healthcare, defense, utilities, education)
Minimum number of employees (Enter minimum number of full-time employees - FTEs)							
Minimum revenue (Enter minimum revenue)							
Minimum assets (Enter minimum assets)							
Minimum contract value (Enter minimum contract value)							
Entity is headquartered in the jurisdiction							
Entities are subjected to disclosure or reporting	Applicable to all.	Applicable to all.	Applicable to all.	Applicable to all.	Applicable to all.	Applicable to all.	The further regulation needed



requirements							is pending.
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28. Can entities for whom compliance with the policy tool is mandatory opt out of the obligation (e.g. comply or explain)?

☒ No

☐ Yes

30. Does the policy tool exclusively apply to entities' domestic operations, or does it also apply to entities' operations beyond the jurisdiction?

☐ Operations within jurisdiction only

☐ Operations beyond the jurisdiction

☒ Not applicable

32. What are the sanctions for non-compliance? Select all that apply and describe in the text field.

☐ Monetary fine

☐ Restriction on business activities

☐ Voiding or setting aside of contract

☐ Exclusion from government contracts

☐ Award of damages or compensation

☐ Penalty for senior managers

☐ Criminal penalties

☒ Not specified

☐ Not applicable (e.g. in cases of voluntary tools)

☐ Other

33. Relative to other compliance activities required of entities in this jurisdiction, is the cost of compliance:

- ☐ Below average
  - ☐ Average
  - ☐ Above average
  - ☐ Not applicable
  - ☒ Unknown or prefer not to answer
- 
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35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority.

- ☐ Below average
  - ☐ Average
  - ☐ Above average
  - ☐ Not applicable
  - ☒ Unknown or prefer not to answer
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37. Have the climate-specific provisions in this instrument ever been enforced?

- ☐ No (If relevant, explain)
  - ☒ Yes
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38. Briefly note one to two exemplary cases of enforcement. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

In May 2021, four NGOs filed a request for precautionary measures against the Brazilian environmental agency, IBAMA, and Copelmi, a mining company, related to an open-pit coal mining project within the Nova Seival coal-fired power plant, which, if approved, will be the largest coal power plant in Brazil. The plaintiffs sought to suspend a public hearing and the permitting procedure until several material issues are resolved. The Public Prosecutor's Office, asked to opine on the case, specifically noted the need to undertake a strategic environmental assessment and asked for the assessment of climate change impacts in the general terms of reference for environmental studies related to thermal power stations, based on PNMC provisions. On August 31, 2021, the court partially

granted the precautionary measures to, among others, include specific requirements in the terms of reference of thermoelectric power plants in the state of Rio Grande do Sul related to climate change, the need for a strategic environmental evaluation, and potential risks to public health. The requirements to assess potential climate change damages are grounded in the National Policy of Climate Change and the State Law No. 13.594/2010 (state policy on climate change) in the terms of reference of permitting procedures of thermal power stations in the state of Rio Grande do Sul.  
<https://web.archive.org/web/20240825205434/https://climatecasechart.com/non-us-case/instituto-preservar-et-al-v-copelmi-mineracao-ltda-and-ibama/>

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39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool?

☒ No

☐ Yes

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41. Does the policy tool recommend or require periodic impact assessments?

☒ No

☐ Recommended

☐ Required

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43. Does the policy tool recommend or require periodic reviews?

☒ No

☐ Recommended

☐ Required

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45. Does the policy tool include mechanisms for enhancing policy or regulatory coordination with subnational governments (e.g. vertical coordination mechanisms such as appointing coordinating agencies, forming working groups, etc.)?

☐ No

☒ Yes

46. Describe the mechanisms for enhancing regulatory coordination with subnational governments. Reference the relevant section/subsection/paragraph of the policy tool where mechanisms for coordination with subnational governments are set.

Article 7 establishes that the institutional instruments for implementing the National Climate Change Policy include: I - the Interministerial Committee on Climate Change; II - the Interministerial Commission on Global Climate Change; III - the Brazilian Forum on Climate Change; IV - the Brazilian Network for Research on Global Climate Change - Rede Clima; V - the Coordination Committee for Meteorology, Climatology and Hydrology Activities

47. Are there any government initiatives to enhance the capacity of targeted entities to implement or comply with the policy tool (e.g. industry working groups, outreach campaigns, education and training, etc.)?

☐ No

☒ Yes

48. Describe initiatives for enhancing the capacity of targeted entities to implement or comply with the policy tool. Reference the relevant section/subsection/paragraph of the policy tool where capacity-building initiatives are established. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

The Climate Plan seeks to identify the best alternatives in terms of costs and effectiveness for the country to cut emissions. The debates take into account actions such as promoting low-carbon agricultural practices, increasing energy efficiency, offering green hydrogen and using other low-emission fuels, as well as selective waste collection and the energy use of solid waste.

The national target will be allocated among the different economic sectors, both for the 2030 and 2035 horizons. The national mitigation strategy will be accompanied by seven sectoral plans defining actions, targets, implementation costs, financing, monitoring and evaluation. The sectors covered are land use change and forests (which includes deforestation), agriculture and livestock farming, cities (including urban mobility), energy (electricity and fossil fuels), industry, waste and transport.  
<https://web.archive.org/web/20240812221757/https://www.gov.br/mma/pt-br/assuntos/mudanca-do-clima/mitigacao>

## Domain-Specific Questions: Transition Planning Questions

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### Disclosure of Plans and Targets

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132. Are targeted entities recommended or required to publicly disclose climate-related targets or transition plans?

- ☒ No
- ☐ Recommended
- ☐ Required

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### Targets

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135. Does the policy tool recommend or require targeted entities to have or develop climate-related targets?

- ☐ No
- ☐ Recommended
- ☒ Required

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136. Does the policy tool recommend or require entities to monitor progress in achieving their targets?

- ☒ No
- ☐ Recommended
- ☐ Required

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138. Does the policy tool recommend or require targeted entities to publicly report on progress in achieving their targets?

- ☒ No
- ☐ Recommended
- ☐ Required

140. Which of the following targets, or data related to targets, does the policy tool recommend or require entities have or develop? Select all that apply.

	Recommended	Required	No
An absolute emissions reduction target	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
An intensity-based emissions reduction target	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A net zero target	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Interim targets (e.g. 2030, 2050)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Targets covering non-carbon GHG emissions	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A Scope 3 emissions target	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A target derived using a sectoral decarbonization approach	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A level of ambition for emissions reductions (e.g. 80% reduction)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A baseline year from which progress is measured	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A target timeframe (e.g. by 2040)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Targets for renewable energy procurement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Targets for fossil fuel phase down/phase up	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Separate targets for GHG offsets and/or removals	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Targets or goals related to climate adaptation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Targets or goals related to nature and biodiversity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other targets related to sustainability	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

150. What is the recommended or required level of ambition for GHG emissions reductions targets?

- ☐ Reduction between 1-25%
- ☒ Reduction between 26-50%
- ☐ Reduction between 51-75%
- ☐ Reduction between 75-85%
- ☐ Reduction between 85-100%
- ☐ Reduction of more than 100%
- ☐ Other

### Transition Plans

164. Does the policy tool recommend or require targeted entities to have or develop a transition plan?

- ☐ No
- ☐ Recommended
- ☒ Required

165. Does the policy tool recommend or require any of the following elements or criteria for transition plans? Select all that apply.

	Recommended	Required	Neither recommended nor required
A timeframe for the transition plan (e.g. 10 year plan, 20 year plan, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Key Performance Indicators (KPIs) for monitoring transition plan implementation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Updates to the transition plan	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Third-party verification and/or audited accuracy of the transition plan	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Identified methodology for scenario analysis	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Monitoring, Oversight, and Implementation

176. Does the policy tool recommend or require entities undertake any of the following with regard to monitoring, oversight, and implementation? Select all that apply.

	Recommended	Required	No
Monitor progress in implementing their transition plan	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Develop financial plans for the implementation of their transition plan	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Integrate climate-related matters into their financial accounting	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Incorporate climate change considerations into their investment decision making and/or asset planning	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Incorporate climate change considerations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



into their capital allocation and/or expenditure plans			
Any other mechanisms for enhancing the achievement of targets and/or the implementation of transition plans	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Engagement, Lobbying, and Governance

184. Does the policy tool recommend or require targeted entities align any of the following engagement and/or governance practices with their targets and/or transition plans?

	Recommended	Required	No
Value chain engagement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Investor engagement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Consumer engagement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Policy engagement and lobbying practices	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Corporate governance structure for transition and verification	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Climate-related financial incentives for employees and board members	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

185. Does the policy tool recommend or require targeted entities to disclose how they have used due diligence and/or stewardship to achieve their targets and/or implement their transition plans?


- ☒ No
- ☐ Recommended
- ☐ Required

## Standards, Frameworks, and Guidelines

194. Does the policy tool require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply.

	Required	Referenced	Neither required nor referenced
IFRS S1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IFRS S2	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Task Force on Climate-related Financial Disclosures (TCFD)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
CDP (formerly known as Climate Disclosure Project) Technical Note: Reporting on Climate Transition Plans	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
International Integrated Reporting Framework	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Global Reporting Initiative (GRI)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sustainability Accounting Standards Board (SASB)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Science Based Targets initiative (SBTi)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Science Based Targets initiative (SBTi) Net Zero Standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
European Sustainability Reporting Standards (ESRS)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Additional Important Information



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197. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

## Policy Tool Name: Ordinance of the Ministry of Transport No. 622/2024

3. Source material link(s):

<https://web.archive.org/web/20240808220200/https://www.in.gov.br/en/web/dou/-/portaria-n-622-de-28-de-junho-de-2024-569046197>

4. Which of the following governance domains does this policy tool relate to? Select all that apply.

☐ Climate-related disclosure

☒ Transition planning

☒ Public procurement

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5. If relevant, briefly explain how the policy tool applies or is linked to multiple domains.

The Ordinance establishes guidelines for the allocation of resources in highway concession contracts aimed at developing resilient infrastructure that is consistent with other energy transition and climate change mitigation measures.

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6. Select the category which best describes the author/issuer of the policy tool.

☐ Head of state and/or government

☐ Independent regulatory or supervisory body

☐ Legislature

☐ Judiciary

☒ Ministry/Department/Agency

☐ Other (Please describe)

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7. Status of the policy tool

☒ Approved, in force

☐ Approved, not yet in force

☐ Other (Please describe)

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9. Year of (planned) entry into force or year of publication

2024

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10. Does the policy tool have an end date?

☒ No

☐ Yes

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12. Briefly describe the policy tool's goal and/or purpose:

For example: The policy tool requires publicly listed companies to comply with the recommendations of the Task Force for Climate Related Financial Disclosure or to explain the absence of such disclosures.

The Ordinance establishes guidelines for the allocation of resources in highway concession contracts aimed at developing resilient infrastructure that is consistent with other energy transition and climate change mitigation measures.

The ordinance establishes that new highway concession projects must allocate at least 1% of the gross revenue from the concession to the development of resilient infrastructure. In addition, it also establishes that new projects must include actions (art. 3) related to (i) the search for sustainable alternatives for collecting and disposing of resources to reduce the impact on the environment; (ii) mitigating greenhouse gas (GHG) emissions; (iii) conserving fauna and flora; (iv) mitigating damage to the ecosystem; and they must encourage both energy efficiency and the use of renewable sources.

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13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.

☐ 1.

☐ 2.

☐ 3.

☐ 4.

☐ 5.

25. Which entities are targeted through this policy tool? Select all that apply.

Note: With regard to sectoral actors, in cases where mandatory and voluntary obligations are mixed (e.g., mandatory for one sector, voluntary for another), select "mandatory" as there will be further opportunity to clarify.

	Mandatory	Voluntary	Not targeted
1. Publicly-traded entities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Private companies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Financial institutions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Small and medium-sized enterprises	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. State-owned companies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Not-for-profit organizations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Government agencies and/or departments (supranational)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Government agencies and/or departments (national)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Government agencies and/or departments (regional - e.g., state, province, region, metropolitan region)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Government agencies and/or departments (local - e.g., county, district, municipality, city)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Government agencies and/or departments (unspecified)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Sectoral actors (e.g., healthcare, defense, utilities, education)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

27. Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory.

	Government agencies and/or departments (national)	Government agencies and/or departments (unspecified)
Minimum number of employees (Enter min number of full-time employees - FTEs)		
Minimum revenue (Enter minimum revenue)		
Minimum assets (Enter minimum assets)		
Minimum contract value (Enter minimum contract value)		
Entity is headquartered in the jurisdiction		
Entities are subjected to disclosure or reporting requirements	Applicable to all entities participating in federal highway concessions	Applicable to all entities participating in federal highway concessions

28. Can entities for whom compliance with the policy tool is mandatory opt out of the obligation (e.g. comply or explain)?

☒ No

☐ Yes

30. Does the policy tool exclusively apply to entities' domestic operations, or does it also apply to entities' operations beyond the jurisdiction?

☒ Operations within jurisdiction only

☐ Operations beyond the jurisdiction

☐ Not applicable

32. What are the sanctions for non-compliance? Select all that apply and describe in the text field.

- ☐ Monetary fine
  - ☐ Restriction on business activities
  - ☐ Voiding or setting aside of contract
  - ☐ Exclusion from government contracts
  - ☐ Award of damages or compensation
  - ☐ Penalty for senior managers
  - ☐ Criminal penalties
  - ☒ Not specified
  - ☐ Not applicable (e.g. in cases of voluntary tools)
  - ☐ Other
- 
- 

33. Relative to other compliance activities required of entities in this jurisdiction, is the cost of compliance:

- ☐ Below average
  - ☐ Average
  - ☐ Above average
  - ☐ Not applicable
  - ☒ Unknown or prefer not to answer
- 
- 

35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority.

- ☐ Below average
- ☐ Average
- ☐ Above average
- ☐ Not applicable
- ☒ Unknown or prefer not to answer



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37. Have the climate-specific provisions in this instrument ever been enforced?

☒ No (If relevant, explain)

☐ Yes  
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39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool?

☒ No

☐ Yes  
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41. Does the policy tool recommend or require periodic impact assessments?

☒ No

☐ Recommended

☐ Required  
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43. Does the policy tool recommend or require periodic reviews?

☒ No

☐ Recommended

☐ Required  
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45. Does the policy tool include mechanisms for enhancing policy or regulatory coordination with subnational governments (e.g. vertical coordination mechanisms such as appointing coordinating agencies, forming working groups, etc.)?

☒ No

☐ Yes

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47. Are there any government initiatives to enhance the capacity of targeted entities to implement or comply with the policy tool (e.g. industry working groups, outreach campaigns, education and training, etc.)?

☐ No

☒ Yes

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48. Describe initiatives for enhancing the capacity of targeted entities to implement or comply with the policy tool. Reference the relevant section/subsection/paragraph of the policy tool where capacity-building initiatives are established. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

The Ordinance establishes that ANTT (National Land Transport Agency) will conduct technical studies through consultations with the aim of mapping vulnerable areas and the need for adaptation actions on federal highways with current concessions (Article 4). Subsequently, after the approval of the tariff results by the Ministry of Transport, ANTT will promote compliance with current contracts to start providing for new investments identified as priorities by the technical studies, respecting the economic and financial balance within the following preferential limits:

- 1% of gross revenue must be provided for actions to adapt the road infrastructure;
  - Impact of 1% on the Basic Toll Rate resulting from the allocation of resources to adaptation actions (Article 5, Paragraph 1 and 2).
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Domain-Specific Questions: Transition Planning Questions

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### **Disclosure of Plans and Targets**

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132. Are targeted entities recommended or required to publicly disclose climate-related targets or transition plans?

☒ No

○ Recommended

○ Required

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### Targets

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135. Does the policy tool recommend or require targeted entities to have or develop climate-related targets?

☒ No

○ Recommended

○ Required

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### Transition Plans

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164. Does the policy tool recommend or require targeted entities to have or develop a transition plan?

☒ No

○ Recommended

○ Required

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### Monitoring, Oversight, and Implementation

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176. Does the policy tool recommend or require entities undertake any of the following with regard to monitoring, oversight, and implementation? Select all that apply.

	Recommended	Required	No
Monitor progress in implementing their transition plan	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Develop financial plans for the implementation of their transition plan	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Integrate climate-related matters into their financial accounting	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Incorporate climate change considerations into their investment decision making and/or asset planning	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Incorporate climate change considerations into their capital allocation and/or expenditure plans	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Any other mechanisms for enhancing the achievement of targets and/or the implementation of transition plans	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

177. Describe the obligation to monitor progress in implementing transition plans, referencing the relevant section/subsection/paragraph of the policy tool.

Article 7 establishes that the National Land Transportation Agency will regulate the ordinance and that such regulation will provide for mechanisms for monitoring and measuring results in each concession contract.

178. Describe the obligation to develop financial plans for the implementation of transition plans, referencing the section/subsection/paragraph of the policy tool.

The sole paragraph of article 2 establishes that the resource destined to reduce the impacts on road infrastructure resulting from climate change will be incorporated into the economic and financial modeling of the bidding notice.

180. Describe the obligation to incorporate climate change considerations into investment decision making and asset planning, referencing the relevant section/subsection/paragraph of the policy tool.

The Ordinance establishes guidelines for the allocation of resources in highway concession contracts aimed at developing resilient infrastructure that is consistent with other energy transition and climate change mitigation measures.

It determines that new highway concession projects must allocate at least 1% of the gross revenue from the concession to the development of resilient infrastructure. In addition, it also establishes that new projects must include actions (art. 3) related to (i) the search for sustainable alternatives for collecting and disposing of resources to reduce the impact on the environment; (ii) mitigating greenhouse gas (GHG) emissions; (iii) conserving fauna and flora; (iv) mitigating damage to the ecosystem; and they must encourage both energy efficiency and the use of renewable sources.

181. Describe the obligation to incorporate climate change considerations into capital allocation and/or expenditure plans, referencing the relevant section/subsection/paragraph of the policy tool.

The sole paragraph of article 2 establishes that the resource destined to reduce the impacts on road infrastructure resulting from climate change will be incorporated into the economic and financial modeling of the bidding notice.

## Engagement, Lobbying, and Governance

184. Does the policy tool recommend or require targeted entities align any of the following engagement and/or governance practices with their targets and/or transition plans?

	Recommended	Required	No
Value chain engagement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Investor engagement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Consumer engagement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Policy engagement and lobbying practices	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Corporate governance structure for transition and verification	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Climate-related financial incentives for employees and board members	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

185. Does the policy tool recommend or require targeted entities to disclose how they have used due diligence and/or stewardship to achieve their targets and/or implement their transition plans?

- ☒ No
- ☐ Recommended
- ☐ Required

### Standards, Frameworks, and Guidelines

194. Does the policy tool require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply.

	Required	Referenced	Neither required nor referenced
IFRS S1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IFRS S2	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Task Force on Climate-related Financial Disclosures (TCFD)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
CDP (formerly known as Climate Disclosure Project) Technical Note: Reporting on Climate Transition Plans	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
International Integrated Reporting Framework	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Global Reporting Initiative (GRI)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sustainability Accounting Standards Board (SASB)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Science Based Targets initiative (SBTi)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Science Based Targets initiative (SBTi) Net Zero Standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
European Sustainability Reporting Standards (ESRS)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Additional Important Information

197. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

### Domain-Specific Questions: Public Procurement Questions

200. Does the policy tool allow, recommend, or require the alignment of public procurement spending with national and/or subnational climate targets?

- ☐ No
- ☒ Allowed and/or recommended
- ☐ Required

201. Describe the obligation to align public procurement spending with national and/or subnational climate targets, referencing the relevant section/subsection/paragraph of the policy tool.

The sole paragraph of article 7 establishes that ANTT's regulation must consider the commitments assumed by Brazil within the scope of the 2030 Agenda for Sustainable Development, as well as the National Climate Change Policy, the National Environmental Policy and other international policies and agreements related to socio-environmental issues.

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202. Does the policy tool set targets in relation to climate-aligned procurement? Select all that apply.

	Allowed/recommended	Required	Not applicable
A minimum percentage of tenders/contracts which must include climate-related criteria	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A minimum number of climate-related criteria to be included in purchases/tenders	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A minimum value of procurement spend which must include climate-related criteria	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A maximum amount of greenhouse gas emissions associated with tenders/contracts (i.e. a carbon ceiling/envelope)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Targets for the reduction of fossil fuel energy consumption associated with tenders/contracts	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Targets for the procurement of products which have a third-party sustainability certification/ ecolabel/ voluntary sustainability standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other (Please describe and reference the section/subsection/paragraph of the policy tool relevant to other climate-aligned procurement targets)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Other Text:



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## Procurement Cycle

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204. Does the policy tool make recommendations or allowances or set requirements related to climate change mitigation at the procurement planning stage? Select all that apply.

	Allowed/ recommended	Required	Not applicable
Procuring entities consider climate change mitigation and/or GHG emissions reductions goals when defining their procurement needs	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Procuring entities have a strategy, plan, or policy regarding the alignment of procurement practices with climate objectives	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Procuring entities set aside a portion of their procurement budgets for climate-aligned procurement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Procuring entities include emissions from procurement in their carbon budget	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Procuring entities follow guidance on calculating procurement-related emissions	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Procuring entities inform and/or consult with market actors in advance of publishing the formal call for tenders, in relation to climate considerations (i.e. pre-procurement consultation,	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

engagement, or dialogue)			
Other allowances, recommendations or requirements related to climate change mitigation or GHG emissions at the procurement planning stage	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

215. Describe and reference the section/subsection/paragraph of the policy tool relevant to other recommendations related to climate change mitigation or GHG emissions at the procurement planning stage.

The ordinance establishes that new highway concession projects must allocate at least 1% of the gross revenue from the concession to the development of resilient infrastructure.

### Life-cycle or Whole-life Costing

217. Does the policy tool recommend or require the use of life-cycle costing or whole-life costing to capture climate-related impacts (e.g. energy or fuel consumption, monetized emissions or other environmental costs, end-of-life costs, etc)?

- ☒ No
- ☐ Allow and/or recommend
- ☐ Require

### Tendering or Solicitation Stage

222. Does the policy tool make allowances, recommendations or set requirements at the tendering or solicitation stage? Select all that apply.

	Allowed/recommended	Required	Not applicable
Exclusion or debarment grounds based on compliance with climate obligations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Qualification or selection criteria related to climate change	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Including climate or environmental considerations when calculating value for money, including through the use of life-cycle or whole-life costing	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Technical specifications (e.g. setting minimum levels of energy efficiency or maximum product carbon emissions)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Contract award criteria or value for money evaluation frameworks (e.g. minimum scores/performance levels under climate-related criteria, preferences for climate or sustainable products)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other procurement stage allowances, recommendations or requirements	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Other Allowances, Recommendations, or Requirements

247. Please list any other allowances, recommendations or requirements at the procurement stage, referencing the relevant section/subsection/paragraph of the policy tool.

The ordinance establishes that new highway concession projects must allocate at least 1% of the gross revenue from the concession to the development of resilient infrastructure.

### Contract Performance

249. Does the policy tool make allowances, recommendations or set requirements at the contract performance stage (e.g. contract clauses, key performance indicators or conditions which must be included to monitor and report on emissions or other metrics)?

- ☒ No
- ☐ Allowed and/or recommended
- ☐ Required

### Monitoring and Reporting

252. Does the policy tool include allowances, recommendations or requirements to monitor and/or report upon climate-aligned procurement?

- ☐ No
- ☒ Allowed and/or recommended
- ☐ Required

254. Are targeted entities recommended or required to monitor and/or report any of the following data? Select all that apply.

- ☐ Adoption of a climate-aligned and/or environmentally sustainable procurement plan or policy
- ☐ Staff training related to climate-aligned and/or environmentally sustainable procurement

- ☐ Number of tenders/contracts which include climate-related criteria
- ☒ Value of tenders/contracts which include climate-related criteria
- ☐ Content of climate-related criteria
- ☐ Level of ambition of climate-related criteria
- ☐ Reasons for not including climate-related criteria in tenders
- ☐ Market response to climate-related criteria (e.g. number of tenders rejected, average or lowest/highest score awarded, feedback received)
- ☐ Outcome of tenders in which climate-related criteria are applied (e.g. impact on award decision, costs, or other factors)
- ☐ Audits of contractors' compliance with climate-related criteria during contract performance
- ☐ Climate impact or outcomes of tenders/contracts
- ☐ Other

258. Is it allowed, recommended or required that monitoring and reporting data be published?

- ☒ No
- ☐ Allowed and/or recommended
- ☐ Required

## Standards, Frameworks, and Guidelines

262. Does the policy tool require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply.

	Required	Referenced	Neither required nor referenced
1. Paris Agreement	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. The jurisdiction's Nationally Determined Contribution (NDC)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3. IFRS S1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. IFRS S2	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Task Force on Climate-related Financial Disclosures (TCFD)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. GHG Protocol Corporate Accounting and Reporting Standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. CDP (formerly known as Climate Disclosure Project) reporting framework	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Science Based Targets initiative (SBTi)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. Science Based Targets initiative (SBTi) Net Zero Standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. United Nations Sustainable Development Goals (SDGs)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12. ISO 20400 Sustainable Procurement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13. EU Green Public Procurement criteria and guidance	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14. UNEP Sustainable Public Procurement Implementation Guidelines	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
15. OECD MAPS - Supplementary Module on Sustainable Public Procurement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
16. Asian Development Bank Guidelines for Sustainable Procurement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
17. African Development Bank Sustainable Public Procurement Guidance Note	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
18. Inter-American Development Bank Green Procurement Guidelines	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
19. EDBR Project Requirements/Environmental and Social Action Plan	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
20. World Bank Environmental and Social Framework	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

21. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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**Additional Important Information**

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265. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

## Policy Tool Name: Law No. 13,576/2017

3. Source material link(s):

[https://web.archive.org/web/20240825231554/https://www.planalto.gov.br/ccivil\\_03/\\_ato2015-2018/2017/lei/l13576.htm](https://web.archive.org/web/20240825231554/https://www.planalto.gov.br/ccivil_03/_ato2015-2018/2017/lei/l13576.htm)

4. Which of the following governance domains does this policy tool relate to? Select all that apply.

☐ Climate-related disclosure

☒ Transition planning

☐ Public procurement

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6. Select the category which best describes the author/issuer of the policy tool.

☐ Head of state and/or government

☐ Independent regulatory or supervisory body

☒ Legislature

☐ Judiciary

☐ Ministry/Department/Agency

☐ Other (Please describe)

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7. Status of the policy tool

☒ Approved, in force

☐ Approved, not yet in force

☐ Other (Please describe)

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9. Year of (planned) entry into force or year of publication

2017

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10. Does the policy tool have an end date?

☒ No

☐ Yes

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12. Briefly describe the policy tool's goal and/or purpose:

For example: The policy tool requires publicly listed companies to comply with the recommendations of the Task Force for Climate Related Financial Disclosure or to explain the absence of such disclosures.

Establishes the RenovaBio Program, as part of the National Energy Policy, which aims to decarbonize the fuel sector. One of the objectives of the RenovaBio Program is to contribute to an adequate relationship between energy efficiency and reduction of greenhouse gas emissions in the production, marketing, and use of biofuels, including life cycle assessment mechanisms.

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13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.

☐ 1. The National Agency of Petroleum, Natural Gas and Biofuels

☐ 2.

☐ 3.

☐ 4.

☐ 5.

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25. Which entities are targeted through this policy tool? Select all that apply.

Note: With regard to sectoral actors, in cases where mandatory and voluntary obligations are mixed (e.g., mandatory for one sector, voluntary for another), select "mandatory" as there will be further opportunity to clarify.

	Mandatory	Voluntary	Not targeted
1. Publicly-traded entities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Private companies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Financial institutions	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Small and medium-sized enterprises	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. State-owned companies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Not-for-profit organizations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Government agencies and/or departments (supranational)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Government agencies and/or departments (national)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Government agencies and/or departments (regional - e.g., state, province, region, metropolitan region)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. Government agencies and/or departments (local - e.g., county, district, municipality, city)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. Government agencies and/or departments (unspecified)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12. Sectoral actors (e.g., healthcare, defense, utilities, education)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

26. In cases where entities are targeted by sector, identify the sector to which the policy tool applies.

	Mandatory	Voluntary	Not applicable
All sectors	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Agriculture, forestry, and fishing	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Mining and quarrying	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Manufacturing	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Electricity, gas, steam, and air conditioning supply	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water supply; sewerage; waste management and remediation activities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Construction	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Wholesale and retail trade; repair of motor vehicles and motorcycles	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Transportation and storage	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Accommodation and food service activities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Information and communication	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Financial and insurance activities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Real estate activities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Professional, scientific and technical activities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Administrative and support service activities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Public administration and defense; compulsory social security	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Education	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Human health and social work activities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Arts, entertainment and recreation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other service activities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Activities of households as employers; undifferentiated goods-and services-producing activities of	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

households for own use			
Activities of extraterritorial organizations and bodies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

27. Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory.

	Sectoral actors (e.g. healthcare, defense, utilities, education)
Minimum number of employees (Enter min number of full-time employees - FTEs)	
Minimum revenue (Enter minimum revenue)	
Minimum assets (Enter minimum assets)	
Minimum contract value (Enter minimum contract value)	
Entity is headquartered in the jurisdiction	
Entities are subjected to disclosure or reporting requirements	applicable to all fuel distributors

28. Can entities for whom compliance with the policy tool is mandatory opt out of the obligation (e.g. comply or explain)?

☒ No

☐ Yes

30. Does the policy tool exclusively apply to entities' domestic operations, or does it also apply to entities' operations beyond the jurisdiction?

☒ Operations within jurisdiction only

☐ Operations beyond the jurisdiction

☐ Not applicable

32. What are the sanctions for non-compliance? Select all that apply and describe in the text field.

- ☒ Monetary fine Up to BRL 50,000,000
  - ☒ Restriction on business activities suspension or stoppage of activity
  - ☐ Voiding or setting aside of contract
  - ☐ Exclusion from government contracts
  - ☒ Award of damages or compensation
  - ☐ Penalty for senior managers
  - ☒ Criminal penalties
  - ☐ Not specified
  - ☐ Not applicable (e.g. in cases of voluntary tools)
  - ☐ Other
- 
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33. Relative to other compliance activities required of entities in this jurisdiction, is the cost of compliance:

- ☐ Below average
  - ☐ Average
  - ☐ Above average
  - ☐ Not applicable
  - ☒ Unknown or prefer not to answer
- 
- 

35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority.

- ☐ Below average
- ☐ Average
- ☐ Above average
- ☐ Not applicable
- ☒ Unknown or prefer not to answer

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37. Have the climate-specific provisions in this instrument ever been enforced?

○ No (If relevant, explain)

● Yes

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38. Briefly note one to two exemplary cases of enforcement. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

Several actions were supported questioning the legality of the rule, claiming that the obligation only for fuel distributors would be discriminatory.

As an example, Minister Gurgel Faria of the Superior Court of Justice issued a decision that maintained the individual goals set by the RenovaBio program, which were being contested by an Association of Fuel Distributors (Brasilcom).

<https://web.archive.org/web/20240813003541/https://www.stj.jus.br/sites/portalp/Paginas/Comunicacao/Noticias/08122020-Mantida-meta-anual-do-governo-federal-para-reducao-de-gases-do-efeito-estufa.aspx>

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39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool?

○ No

● Yes

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40. Describe the monitoring systems in place. Please reference the relevant section/subsection/paragraph of the policy tool where monitoring systems are set.

The National Biofuels Policy Committee was created to monitor the supply and development of biofuel production and market, given its importance for the regularity of fuel supply, in addition to monitoring the supply, demand and prices of Decarbonization Credits issued and traded from the commercialization of biofuels.

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41. Does the policy tool recommend or require periodic impact assessments?

☒ No

☐ Recommended

☐ Required

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43. Does the policy tool recommend or require periodic reviews?

☒ No

☐ Recommended

☐ Required

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45. Does the policy tool include mechanisms for enhancing policy or regulatory coordination with subnational governments (e.g. vertical coordination mechanisms such as appointing coordinating agencies, forming working groups, etc.)?

☒ No

☐ Yes

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47. Are there any government initiatives to enhance the capacity of targeted entities to implement or comply with the policy tool (e.g. industry working groups, outreach campaigns, education and training, etc.)?

☐ No

☒ Yes

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48. Describe initiatives for enhancing the capacity of targeted entities to implement or comply with the policy tool. Reference the relevant section/subsection/paragraph of the policy tool where capacity-building initiatives are established. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

The Government created the "RenovaBio Itinerante". With the purpose of providing biofuel producing centers with information on the operation of RenovaBio, especially the RenovaCalc calculator, explaining any doubts and identifying the need for improvements, the National Petroleum Agency implemented the "RenovaBio Itinerante" program, which are meetings with economic agents and

associations where presentations are made and topics relevant to the program are discussed.  
<https://web.archive.org/web/20240813005815/https://www.gov.br/anp/pt-br/assuntos/renovabio/renovabio-itinerante>

Domain-Specific Questions: Transition Planning Questions

### Disclosure of Plans and Targets

132. Are targeted entities recommended or required to publicly disclose climate-related targets or transition plans?

- ☒ No
- ☐ Recommended
- ☐ Required

Targets

135. Does the policy tool recommend or require targeted entities to have or develop climate-related targets?

- ☐ No
- ☐ Recommended
- ☒ Required

136. Does the policy tool recommend or require entities to monitor progress in achieving their targets?

- ☐ No
- ☐ Recommended



● Required

137. Describe and reference the section/subsection/paragraph of the policy tool relevant to monitoring progress in achieving targets.

Article 22, sole paragraph, defines that a report must be published on the internet annually with the results of the inspection actions and with any administrative and financial reviews applied to the inspection firms.

138. Does the policy tool recommend or require targeted entities to publicly report on progress in achieving their targets?

● No

○ Recommended

○ Required

140. Which of the following targets, or data related to targets, does the policy tool recommend or require entities have or develop? Select all that apply.

	Recommended	Required	No
An absolute emissions reduction target	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
An intensity-based emissions reduction target	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A net zero target	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Interim targets (e.g. 2030, 2050)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Targets covering non-carbon GHG emissions	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A Scope 3 emissions target	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A target derived using a sectoral decarbonization approach	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A level of ambition for emissions reductions (e.g. 80% reduction)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A baseline year from which progress is measured	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A target timeframe (e.g. by 2040)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Targets for renewable energy procurement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Targets for fossil fuel phase down/phase up	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Separate targets for GHG offsets and/or removals	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Targets or goals related to climate adaptation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Targets or goals related to nature and biodiversity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other targets related to sustainability	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

148. For which of the following sectors are entities recommended or required to develop targets derived using a sectoral decarbonization approach? Select all that apply.

- ☐ Power generation
- ☐ Industry
- ☐ Transport Services
- ☐ Services/Commercial buildings
- ☒ Other fuel distribution
- ☐ None specified

149. Does the policy tool recommend or require targets derived using a sectoral decarbonization approach be validated by a third-party?

- ☐ No
- ☐ Recommended

☒ Required

156. Describe and reference the section/subsection/paragraph of the policy tool relevant to setting separate targets for GHG offsets and/or removals.

The Law creates the CBIO, which are Decarbonization Credit – a instrument registered in written form, for the purpose of proving the individual goal of the fuel distributor (Article 5, V). Also, the second paragraph of article 7 establishes that proof of compliance with the individual target by each fuel distributor will be carried out based on the amount of Decarbonization Credits on their property, on the date defined in the regulation.

157. Does the policy tool recommend or require any certification standards for the use of offsetting or removals?

☐ No

☐ Recommended (Please reference the relevant section/subsection/paragraph of the policy tool related to certification standards for the use of offsets and/or removals)

☒ Required (Please reference the relevant section/subsection/paragraph of the policy tool related to certification standards for the use of offsets and/or removals) Article 5, I, defines the Biofuel Certification as set of procedures and criteria in a process, in which the inspection firm assesses the conformity of the measurement of aspects related to the production or import of biofuels, based on energy efficiency and greenhouse gas emissions, based on a life cycle assessment.

## Transition Plans

164. Does the policy tool recommend or require targeted entities to have or develop a transition plan?

☒ No

☐ Recommended

☐ Required

## Monitoring, Oversight, and Implementation

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176. Does the policy tool recommend or require entities undertake any of the following with regard to monitoring, oversight, and implementation? Select all that apply.

	Recommended	Required	No
Monitor progress in implementing their transition plan	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Develop financial plans for the implementation of their transition plan	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Integrate climate-related matters into their financial accounting	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Incorporate climate change considerations into their investment decision making and/or asset planning	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Incorporate climate change considerations into their capital allocation and/or expenditure plans	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Any other mechanisms for enhancing the achievement of targets and/or the implementation of transition plans	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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177. Describe the obligation to monitor progress in implementing transition plans, referencing the relevant section/subsection/paragraph of the policy tool.

Article 23 states that, within the scope of certification of efficient production or import of biofuels, the movement of commercialized fuels will be monitored in order to verify their compliance with the Decarbonization Credits issued and compliance with mandatory individual targets.

To this end, data and information will be requested from biofuel producers, biofuel importers and fuel distributors, without prejudice to other monitoring and inspection actions defined in the Law.

## Engagement, Lobbying, and Governance

184. Does the policy tool recommend or require targeted entities align any of the following engagement and/or governance practices with their targets and/or transition plans?

	Recommended	Required	No
Value chain engagement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Investor engagement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Consumer engagement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Policy engagement and lobbying practices	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Corporate governance structure for transition and verification	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Climate-related financial incentives for employees and board members	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

185. Does the policy tool recommend or require targeted entities to disclose how they have used due diligence and/or stewardship to achieve their targets and/or implement their transition plans?

- ☒ No
- ☐ Recommended
- ☐ Required

## Standards, Frameworks, and Guidelines

194. Does the policy tool require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply.

	Required	Referenced	Neither required nor referenced
IFRS S1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IFRS S2	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Task Force on Climate-related Financial Disclosures (TCFD)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
CDP (formerly known as Climate Disclosure Project) Technical Note: Reporting on Climate Transition Plans	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
International Integrated Reporting Framework	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Global Reporting Initiative (GRI)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sustainability Accounting Standards Board (SASB)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Science Based Targets initiative (SBTi)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Science Based Targets initiative (SBTi) Net Zero Standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
European Sustainability Reporting Standards (ESRS)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### Additional Important Information

197. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

## Policy Tool Name: Law No. 14,133/2021

3. Source material link(s):

[https://web.archive.org/web/20240826002056/https://www.planalto.gov.br/ccivil\\_03/\\_ato2019-2022/2021/lei/l14133.htm](https://web.archive.org/web/20240826002056/https://www.planalto.gov.br/ccivil_03/_ato2019-2022/2021/lei/l14133.htm)

4. Which of the following governance domains does this policy tool relate to? Select all that apply.

☐ Climate-related disclosure

☐ Transition planning

☒ Public procurement

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6. Select the category which best describes the author/issuer of the policy tool.

☐ Head of state and/or government

☐ Independent regulatory or supervisory body

☒ Legislature

☐ Judiciary

☐ Ministry/Department/Agency

☐ Other (Please describe)

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7. Status of the policy tool

☒ Approved, in force

☐ Approved, not yet in force

☐ Other (Please describe)

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9. Year of (planned) entry into force or year of publication

2021

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10. Does the policy tool have an end date?

☒ No

☐ Yes

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12. Briefly describe the policy tool's goal and/or purpose:

For example: The policy tool requires publicly listed companies to comply with the recommendations of the Task Force for Climate Related Financial Disclosure or to explain the absence of such disclosures.

The Law establishes general bidding and contracting rules for Direct, Autonomous and Foundational Public Administrations of the Union, States, Federal District and Municipalities. Sustainability can be one of the criteria for applying variable remuneration linked to the performance of contractors for works, supplies and services.

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13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.

☐ 1.

☐ 2.

☐ 3.

☐ 4.

☐ 5.

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25. Which entities are targeted through this policy tool? Select all that apply.

Note: With regard to sectoral actors, in cases where mandatory and voluntary obligations are mixed (e.g., mandatory for one sector, voluntary for another), select "mandatory" as there will be further opportunity to clarify.

	Mandatory	Voluntary	Not targeted
1. Publicly-traded entities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Private companies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



3. Financial institutions	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Small and medium-sized enterprises	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. State-owned companies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Not-for-profit organizations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Government agencies and/or departments (supranational)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Government agencies and/or departments (national)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Government agencies and/or departments (regional - e.g., state, province, region, metropolitan region)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Government agencies and/or departments (local - e.g., county, district, municipality, city)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Government agencies and/or departments (unspecified)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Sectoral actors (e.g., healthcare, defense, utilities, education)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

27. Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory.

	Government agencies and/or departments (national)	Government agencies and/or departments (regional - e.g. state, province, region, metropolitan region)	Government agencies and/or departments (local - e.g. county, district, municipality, city)	Government agencies and/or departments (unspecified)
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Minimum number of employees (Enter min number of full-time employees - FTEs)				
Minimum revenue (Enter minimum revenue)				
Minimum assets (Enter minimum assets)				
Minimum contract value (Enter minimum contract value)				
Entity is headquartered in the jurisdiction				
Entities are subjected to disclosure or reporting requirements	Applicable to all	Applicable to all	Applicable to all	Applicable to all

28. Can entities for whom compliance with the policy tool is mandatory opt out of the obligation (e.g. comply or explain)?

☒ No

☐ Yes

30. Does the policy tool exclusively apply to entities' domestic operations, or does it also apply to entities' operations beyond the jurisdiction?

☐ Operations within jurisdiction only

☒ Operations beyond the jurisdiction

☐ Not applicable

31. What are the specific obligations and conditions for entities' operations beyond the jurisdiction? Please reference the relevant section/subsection/paragraph of the policy tool.

Article 1, paragraph 2 establishes that contracts carried out within the scope of public offices based abroad will comply with local peculiarities and the basic principles established in this Law, in the form of specific regulations to be edited by a State minister.

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32. What are the sanctions for non-compliance? Select all that apply and describe in the text field.

☒ Monetary fine The sanction will be calculated in the form of the notice or contract, may not be less than 0.5% (five tenths of a percent) nor more than 30% (thirty percent) of the value of the contract tendered or concluded with direct contracting and will be applied to the person responsible for any of the administrative infractions provided in this Law.

☐ Restriction on business activities

☐ Voiding or setting aside of contract

☐ Exclusion from government contracts

☐ Award of damages or compensation

☐ Penalty for senior managers

☐ Criminal penalties

☐ Not specified

☐ Not applicable (e.g. in cases of voluntary tools)

☒ Other ☐ Warning; prohibition on bidding and contracting; and declaration of unsuitability to bid or contract

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33. Relative to other compliance activities required of entities in this jurisdiction, is the cost of compliance:

☐ Below average

☐ Average

☐ Above average

☐ Not applicable

☒ Unknown or prefer not to answer

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35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority.

- ☐ Below average
- ☐ Average
- ☐ Above average
- ☐ Not applicable
- ☒ Unknown or prefer not to answer

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37. Have the climate-specific provisions in this instrument ever been enforced?

- ☒ No (If relevant, explain)
- ☐ Yes

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39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool?

- ☒ No
- ☐ Yes

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41. Does the policy tool recommend or require periodic impact assessments?

- ☒ No
- ☐ Recommended
- ☐ Required

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43. Does the policy tool recommend or require periodic reviews?

- ☒ No
- ☐ Recommended
- ☐ Required

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45. Does the policy tool include mechanisms for enhancing policy or regulatory coordination with subnational governments (e.g. vertical coordination mechanisms such as appointing coordinating agencies, forming working groups, etc.)?

☒ No

☐ Yes

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47. Are there any government initiatives to enhance the capacity of targeted entities to implement or comply with the policy tool (e.g. industry working groups, outreach campaigns, education and training, etc.)?

☒ No

☐ Yes

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#### **Additional Important Information**

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197. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

None

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## Domain-Specific Questions: Public Procurement Questions

200. Does the policy tool allow, recommend, or require the alignment of public procurement spending with national and/or subnational climate targets?

- ☒ No
- ☐ Allowed and/or recommended
- ☐ Required

202. Does the policy tool set targets in relation to climate-aligned procurement? Select all that apply.

	Allowed/recommended	Required	Not applicable
A minimum percentage of tenders/contracts which must include climate-related criteria	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A minimum number of climate-related criteria to be included in purchases/tenders	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A minimum value of procurement spend which must include climate-related criteria	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A maximum amount of greenhouse gas emissions associated with tenders/contracts (i.e. a carbon ceiling/envelope)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Targets for the reduction of fossil fuel energy consumption associated with tenders/contracts	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Targets for the procurement of products which have a third-party sustainability certification/ ecolabel/ voluntary sustainability standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other (Please describe and reference the	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

section/subsection/paragraph of the policy tool relevant to other climate-aligned procurement targets)			
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Other Text: It is possible to establish variable remuneration linked to the contractor's performance based on goals, quality standards, and environmental sustainability criteria

## Procurement Cycle

204. Does the policy tool make recommendations or allowances or set requirements related to climate change mitigation at the procurement planning stage? Select all that apply.

	Allowed/ recommended	Required	Not applicable
Procuring entities consider climate change mitigation and/or GHG emissions reductions goals when defining their procurement needs	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Procuring entities have a strategy, plan, or policy regarding the alignment of procurement practices with climate objectives	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Procuring entities set aside a portion of their procurement budgets for climate-aligned procurement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Procuring entities include emissions from procurement in their carbon budget	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Procuring entities follow guidance on calculating procurement-related emissions	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Procuring entities inform and/or consult	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

with market actors in advance of publishing the formal call for tenders, in relation to climate considerations (i.e. pre-procurement consultation, engagement, or dialogue)			
Other allowances, recommendations or requirements related to climate change mitigation or GHG emissions at the procurement planning stage	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Life-cycle or Whole-life Costing

217. Does the policy tool recommend or require the use of life-cycle costing or whole-life costing to capture climate-related impacts (e.g. energy or fuel consumption, monetized emissions or other environmental costs, end-of-life costs, etc)?

- ☒ No
- ☐ Allow and/or recommend
- ☐ Require

### Tendering or Solicitation Stage

222. Does the policy tool make allowances, recommendations or set requirements at the tendering or solicitation stage? Select all that apply.

	Allowed/recommended	Required	Not applicable
Exclusion or debarment grounds	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



based on compliance with climate obligations			
Qualification or selection criteria related to climate change	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Including climate or environmental considerations when calculating value for money, including through the use of life-cycle or whole-life costing	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Technical specifications (e.g. setting minimum levels of energy efficiency or maximum product carbon emissions)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Contract award criteria or value for money evaluation frameworks (e.g. minimum scores/performance levels under climate-related criteria, preferences for climate or sustainable products)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other procurement stage allowances, recommendations or requirements	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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### Contract Award Criteria

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### Contract Performance

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249. Does the policy tool make allowances, recommendations or set requirements at the contract performance stage (e.g. contract clauses, key performance indicators or conditions which must be included to monitor and report on emissions or other metrics)?

- ☒ No
- ☐ Allowed and/or recommended
- ☐ Required

### Monitoring and Reporting

252. Does the policy tool include allowances, recommendations or requirements to monitor and/or report upon climate-aligned procurement?

- ☒ No
- ☐ Allowed and/or recommended
- ☐ Required


### Standards, Frameworks, and Guidelines

262. Does the policy tool require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply.

	Required	Referenced	Neither required nor referenced
1. Paris Agreement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. The jurisdiction's Nationally Determined Contribution (NDC)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. IFRS S1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. IFRS S2	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Task Force on Climate-related Financial Disclosures (TCFD)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

6. GHG Protocol Corporate Accounting and Reporting Standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. CDP (formerly known as Climate Disclosure Project) reporting framework	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Science Based Targets initiative (SBTi)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. Science Based Targets initiative (SBTi) Net Zero Standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. United Nations Sustainable Development Goals (SDGs)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12. ISO 20400 Sustainable Procurement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13. EU Green Public Procurement criteria and guidance	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14. UNEP Sustainable Public Procurement Implementation Guidelines	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
15. OECD MAPS - Supplementary Module on Sustainable Public Procurement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
16. Asian Development Bank Guidelines for Sustainable Procurement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
17. African Development Bank Sustainable Public Procurement Guidance Note	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
18. Inter-American Development Bank Green Procurement Guidelines	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
19. EDBR Project Requirements/Environmental and Social Action Plan	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
20. World Bank Environmental and Social Framework	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
21. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Additional Important Information



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265. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

## Policy Tool Name: Law No. 13,303/2016

3. Source material link(s):

[https://web.archive.org/web/20240808203537/https://www.planalto.gov.br/ccivil\\_03/\\_ato2015-2018/2016/lei/l13303.htm](https://web.archive.org/web/20240808203537/https://www.planalto.gov.br/ccivil_03/_ato2015-2018/2016/lei/l13303.htm)

4. Which of the following governance domains does this policy tool relate to? Select all that apply.

☐ Climate-related disclosure

☐ Transition planning

☒ Public procurement

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6. Select the category which best describes the author/issuer of the policy tool.

☐ Head of state and/or government

☐ Independent regulatory or supervisory body

☒ Legislature

☐ Judiciary

☐ Ministry/Department/Agency

☐ Other (Please describe)

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7. Status of the policy tool

☒ Approved, in force

☐ Approved, not yet in force

☐ Other (Please describe)

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9. Year of (planned) entry into force or year of publication

2016

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10. Does the policy tool have an end date?

☒ No

☐ Yes

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12. Briefly describe the policy tool's goal and/or purpose:

For example: The policy tool requires publicly listed companies to comply with the recommendations of the Task Force for Climate Related Financial Disclosure or to explain the absence of such disclosures.

The Law No. 13.303/2016 establishes the legal regime for public companies, mixed economies corporations and their subsidiaries. Within its prescriptions there are also those directed to the public procurements operated by the targeted entities. The policy tool also does not refer to climate matters in specific once there are prescriptions only regarding general concepts as sustainable development and mandatory obligations of observing environmental protection.

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13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.

☐ 1.

☐ 2.

☐ 3.

☐ 4.

☐ 5.

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25. Which entities are targeted through this policy tool? Select all that apply.

Note: With regard to sectoral actors, in cases where mandatory and voluntary obligations are mixed (e.g., mandatory for one sector, voluntary for another), select "mandatory" as there will be further opportunity to clarify.

	Mandatory	Voluntary	Not targeted
1. Publicly-traded entities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Private companies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Financial institutions	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Small and medium-sized enterprises	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. State-owned companies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Not-for-profit organizations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Government agencies and/or departments (supranational)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Government agencies and/or departments (national)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Government agencies and/or departments (regional - e.g., state, province, region, metropolitan region)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. Government agencies and/or departments (local - e.g., county, district, municipality, city)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. Government agencies and/or departments (unspecified)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12. Sectoral actors (e.g., healthcare, defense, utilities, education)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

27. Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory.

	State-owned companies
Minimum number of employees (Enter min number of full-time employees - FTEs)	
Minimum revenue (Enter minimum revenue)	BRL 90,000,000
Minimum assets (Enter minimum assets)	
Minimum contract value (Enter minimum contract value)	
Entity is headquartered in the jurisdiction	
Entities are subjected to disclosure or reporting requirements	

28. Can entities for whom compliance with the policy tool is mandatory opt out of the obligation (e.g. comply or explain)?

☒ No

☐ Yes

30. Does the policy tool exclusively apply to entities' domestic operations, or does it also apply to entities' operations beyond the jurisdiction?

☐ Operations within jurisdiction only

☐ Operations beyond the jurisdiction

☒ Not applicable

32. What are the sanctions for non-compliance? Select all that apply and describe in the text field.

☒ Monetary fine

☒ Restriction on business activities

☐ Voiding or setting aside of contract

☐ Exclusion from government contracts

☐ Award of damages or compensation

☐ Penalty for senior managers



- ☐ Criminal penalties
  - ☐ Not specified
  - ☐ Not applicable (e.g. in cases of voluntary tools)
  - ☐ Other
- 
- 

33. Relative to other compliance activities required of entities in this jurisdiction, is the cost of compliance:

- ☐ Below average
  - ☐ Average
  - ☐ Above average
  - ☐ Not applicable
  - ☒ Unknown or prefer not to answer
- 
- 

35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority.

- ☐ Below average
  - ☐ Average
  - ☐ Above average
  - ☐ Not applicable
  - ☒ Unknown or prefer not to answer
- 
- 

37. Have the climate-specific provisions in this instrument ever been enforced?

- ☒ No (If relevant, explain) There are no climate-specific provisions, only sustainability aspects.
  - ☐ Yes
- 
-

39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool?

☒ No

☐ Yes

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41. Does the policy tool recommend or require periodic impact assessments?

☒ No

☐ Recommended

☐ Required

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43. Does the policy tool recommend or require periodic reviews?

☒ No

☐ Recommended

☐ Required

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45. Does the policy tool include mechanisms for enhancing policy or regulatory coordination with subnational governments (e.g. vertical coordination mechanisms such as appointing coordinating agencies, forming working groups, etc.)?

☒ No

☐ Yes

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47. Are there any government initiatives to enhance the capacity of targeted entities to implement or comply with the policy tool (e.g. industry working groups, outreach campaigns, education and training, etc.)?

☒ No

☐ Yes

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### Additional Important Information

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197. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

None

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### Domain-Specific Questions: Public Procurement Questions

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200. Does the policy tool allow, recommend, or require the alignment of public procurement spending with national and/or subnational climate targets?

- ☒ No
- ☐ Allowed and/or recommended
- ☐ Required
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202. Does the policy tool set targets in relation to climate-aligned procurement? Select all that apply.

	Allowed/recommended	Required	Not applicable
A minimum percentage of tenders/contracts which must include climate-related criteria	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A minimum number of climate-related criteria to be included in purchases/tenders	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A minimum value of procurement spend which	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

must include climate-related criteria			
A maximum amount of greenhouse gas emissions associated with tenders/contracts (i.e. a carbon ceiling/envelope)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Targets for the reduction of fossil fuel energy consumption associated with tenders/contracts	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Targets for the procurement of products which have a third-party sustainability certification/ ecolabel/ voluntary sustainability standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other (Please describe and reference the section/subsection/paragraph of the policy tool relevant to other climate-aligned procurement targets)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Other Text: It is possible to establish variable remuneration linked to the contractor's performance, based on goals, quality standards, and environmental sustainability criteria.

## Procurement Cycle

204. Does the policy tool make recommendations or allowances or set requirements related to climate change mitigation at the procurement planning stage? Select all that apply.

	Allowed/ recommended	Required	Not applicable
Procuring entities consider climate change mitigation and/or GHG emissions reductions goals when defining their procurement needs	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Procuring entities have a strategy, plan, or policy regarding the	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

alignment of procurement practices with climate objectives			
Procuring entities set aside a portion of their procurement budgets for climate-aligned procurement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Procuring entities include emissions from procurement in their carbon budget	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Procuring entities follow guidance on calculating procurement-related emissions	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Procuring entities inform and/or consult with market actors in advance of publishing the formal call for tenders, in relation to climate considerations (i.e. pre-procurement consultation, engagement, or dialogue)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other allowances, recommendations or requirements related to climate change mitigation or GHG emissions at the procurement planning stage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Life-cycle or Whole-life Costing

217. Does the policy tool recommend or require the use of life-cycle costing or whole-life costing to capture climate-related impacts (e.g. energy or fuel consumption, monetized emissions or other environmental costs, end-of-life costs, etc)?

☒ No

- Allow and/or recommend
- Require

## Tendering or Solicitation Stage

222. Does the policy tool make allowances, recommendations or set requirements at the tendering or solicitation stage? Select all that apply.

	Allowed/recommended	Required	Not applicable
Exclusion or debarment grounds based on compliance with climate obligations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Qualification or selection criteria related to climate change	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Including climate or environmental considerations when calculating value for money, including through the use of life-cycle or whole-life costing	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Technical specifications (e.g. setting minimum levels of energy efficiency or maximum product carbon emissions)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Contract award criteria or value for money evaluation frameworks (e.g. minimum scores/performance levels under climate-related criteria, preferences for climate	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

or sustainable products)			
Other procurement stage allowances, recommendations or requirements	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Life-cycle costing or whole-life costing

241. Describe how life-cycle costing or whole-life costing is allowed, recommended, or required at the tendering or solicitation stage, referencing the relevant section/subsection/paragraph of the policy tool.

As mentioned above, there is no climate-specific provisions. Even though, the policy tool prescribes that environmental costs and benefits must be considered in the determination bigger competitive advantages within public procurement procedures operated by the target entities (art. 32. II).

### Contract Award Criteria

### Contract Performance

249. Does the policy tool make allowances, recommendations or set requirements at the contract performance stage (e.g. contract clauses, key performance indicators or conditions which must be included to monitor and report on emissions or other metrics)?

- ☒ No
- ☐ Allowed and/or recommended
- ☐ Required

### Monitoring and Reporting

252. Does the policy tool include allowances, recommendations or requirements to monitor and/or report upon climate-aligned procurement?

- ☒ No
- ☐ Allowed and/or recommended
- ☐ Required

### Standards, Frameworks, and Guidelines

262. Does the policy tool require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply.

	Required	Referenced	Neither required nor referenced
1. Paris Agreement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. The jurisdiction's Nationally Determined Contribution (NDC)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. IFRS S1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. IFRS S2	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Task Force on Climate-related Financial Disclosures (TCFD)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. GHG Protocol Corporate Accounting and Reporting Standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. CDP (formerly known as Climate Disclosure Project) reporting framework	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Science Based Targets initiative (SBTi)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. Science Based Targets initiative (SBTi) Net Zero Standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



11. United Nations Sustainable Development Goals (SDGs)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12. ISO 20400 Sustainable Procurement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13. EU Green Public Procurement criteria and guidance	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14. UNEP Sustainable Public Procurement Implementation Guidelines	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
15. OECD MAPS - Supplementary Module on Sustainable Public Procurement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
16. Asian Development Bank Guidelines for Sustainable Procurement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
17. African Development Bank Sustainable Public Procurement Guidance Note	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
18. Inter-American Development Bank Green Procurement Guidelines	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
19. EDBR Project Requirements/Environmental and Social Action Plan	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
20. World Bank Environmental and Social Framework	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
21. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Additional Important Information

265. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.