# Oxford Climate Policy Monitor 2024 Survey

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### Table of Contents

Policy Tool Name: CVM Resolution 193	4
Policy Tool Name: CVM Resolution 80	
Policy Tool Name: Law No 14,904/2024	45
Policy Tool Name: SUSEP Circular No. 666	57
Policy Tool Name: Brazilian Central Bank Resolution No. 151	71
Policy Tool Name: Brazilian Central Bank Resolution No. 139	87
Policy Tool Name: Law No. 12,187/2009	100
Policy Tool Name: Ordinance of the Ministry of Transport No. 622/2024	116
Policy Tool Name: Law No. 13,576/2017	136
Policy Tool Name: Law No. 14,133/2021	151
Policy Tool Name: Law No. 13,303/2016	165

# Policy Tool Name: CVM Resolution 193

htt	Source material link(s): ps://web.archive.org/web/20240822053302/https://conteudo.cvm.gov.br/legislacao/resolucoes/res .93.html
4.	Which of the following governance domains does this policy tool relate to? Select all that apply.
<b>V</b> (	Climate-related disclosure
□.	Transition planning
	Public procurement
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
7.	Status of the policy tool
	Approved, in force
o <b>/</b>	Approved, not yet in force
o <b>C</b>	Other (Please describe)
9. `	Year of (planned) entry into force or year of publication
<u>20</u>	<u>23</u>

10. Does the policy tool have an end date?
No
o Yes
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).
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
o 2.
o 3.
o 4.
o 5.
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.
o O- No Capacity (Please explain)
o 1- Low Capacity (Please explain)
o 2- Medium Capacity (Please explain)

- ' '	regulation in Brazil and h	ne government body responas full authority to enforce	_
o Prefer not to answer			
o Not Applicable			
25. Which entities are tar	geted through this policy	tool? Select all that apply	
-	or one sector, voluntary for rify.	where mandatory and volor another), select "mandat	tory" as there will be
	Mandatory	Voluntary	Not targeted
1. Publicly-traded entities	✓		
2. Private companies			
3. Financial institutions			
4. Small and medium-			
sized enterprises			
5. State-owned			
companies			
6. Not-for-profit organizations			
7. Government			
agencies and/or			
departments			
(supranational)			
8. Government			
agencies and/or			
departments (national)			
9. Government			
agencies and/or			
departments (regional			
- e.g., state, province,			
region, metropolitan			
region)			
10. Government			
agencies and/or			
departments (local -			
e.g., county, district,			
municipality, city)			

11. Government

agencies and/or

departments (unspecified)			
12. Sectoral actors			
(e.g., healthcare,			
defense, utilities,			
education)			
13. Other		✓	
13. Other Text: investmen	t funds, and securitization	<u>n companies</u>	
27. Describe the threshold	d criteria to identify entitie	es for whom or instances i	n which compliance is
mandatory.			
		Publicly-traded entities	
Minimum number of emp	olovees (Enter min	r ability traded critices	
number of full-time emp	•		
Minimum revenue (Enter	minimum revenue)		
Minimum assets (Enter r			
Minimum contract value	(Enter minimum		
contract value)			
Entity is headquartered i		T	
Entities are subjected to disclosure or reporting requirements		The regulation is applicable to all publicly held companies.	
requirements		Companies.	
28. Can entities for whom	compliance with the poli	cy tool is mandatory opt c	out of the obligation (e.g.
comply or explain)?	, ,		3 (3
No			
∘ Yes			
0 103			
30. Does the policy tool ex	xclusively apply to entities	s' domestic operations, or	does it also apply to
entities' operations beyon		domestic operations, or	aces it also apply to
•	-		
<ul> <li>Operations within jurisd</li> </ul>	liction only		
o 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 <u>Up to R\$ 50 million</u>
☑ Restriction on business activities <u>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</u>
□ Voiding or setting aside of contract
☐ Exclusion from government contracts
☐ Award of damages or compensation
☑ Penalty for senior managers <u>Breach of the fiduciary duties and disclosure obligations applicable to the managers may be prosecuted by the CVM</u>
☐ 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:
o Below average
∘ Average
o Above average
o Not applicable
<ul><li>Unknown or prefer not to answer</li></ul>
35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority.
o Below average
o Average
o Above average

o 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     No			
o Yes			
41. Does the policy tool recommend or require periodic impact assessments?			
No     No			
∘ Recommended			
o Required			
43. Does the policy tool recommend or require periodic reviews?			
No     No			
∘ Recommended			
∘ Required			

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			
		e the capacity of targeted groups, outreach campaigr	
No			
∘ Yes			
D	D: 1 0 "		
Domain-Specific Question	ns: Disclosure Questions		
What is being disclosed?	?		
E2 Are towarded entities		to displace any of the fall	auting alimenta valetad
information? Select all the	·	to disclose any of the follo	owing climate-related
	Recommended	Required	Neither recommended
	recommended	required	nor required
1. Greenhouse gas (GHG) emissions		V	
2. GHG emissions offsets or removals			
3. GHG emissions			
reduction targets			
4. Other climate- related targets		<b>V</b>	
5. Physical climate risk			
6. Transition risk		☑	
7. Transition plan		☑	
1 -			

Disclosure of Greenhouse Gas (GHG) Emissions		
54. Which GHG emissions must be disclosed? Select all that apply.		
☑ Carbon dioxide (CO2)		
☑ Methane (CH <sub>4</sub> )		
☑ Nitrous oxide (N₂O)		
☑ Hydrofluorocarbons (HFCs)		
☑ Perfluorocarbons (PFCs)		
☑ Sulphur hexafluoride (SF6)		
☑ Nitrogen trifluoride (NF3)		
☑ Carbon dioxide equivalent (CO₂e)		
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			
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)			
59. Does the policy tool recommend or require the GHG inventory be third-party verified?			
No     No			
o Recommended			
o Required			
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.			
Disclosure of Greenhouse Gas (GHG) Offsets or Removals			
62. Does the policy tool recommend or require offsetting purchases be disclosed?  • No			

<ul> <li>Recommended (Please describe and reference the relevant section/subsection/paragraph of the policy tool)</li> </ul>
• 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
63. Does the policy tool recommend or require entities disclose whether offsets are verified?
o No
o 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
64. Does the policy tool recommend or require any certification standards for the use of GHG
offsetting or removals?
∘ No
o 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
65. Does the policy tool include any other recommendations or requirements regarding the

appropriate use of offsets?

0	Ν	lo
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 $\circ$  Recommended (Please describe and reference the relevant section/subsection/paragraph of the policy tool)

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		✓	
An intensity-based emissions reduction target		☑	
A net zero target		✓	
Targets covering non- carbon GHG emissions		☑	
A Scope 3 emissions target		Ø	
A target derived using a sectoral decarbonization approach			
Interim targets		<b>☑</b>	
A target timeframe (e.g. by 2040)		✓	
A baseline year from which progress is measured		☑	
A level of ambition for emissions reductions (e.g. 80% reduction)			

68. Does the policy tool recommend or require entities to disclose their progress in achieving their emissions reductions targets?
∘ No
∘ Recommended
69. What is the recommended or required frequency of progress reports regarding the achievement of emissions reductions targets?
o Yearly
o Every two years
o Every three years
o Every four years
o Every five years
o 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

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)?
o Between 2030 and 2035
o Between 2036 and 2040
o Between 2041 and 2045
o Between 2046 and 2050
o Between 2051 and 2060
o Between 2061 and 2070

o Other
Not specified
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 (N₂O)
☑ Hydrofluorocarbons (HFCs)
☑ Perfluorocarbons (PFCs)
☑ Sulphur hexafluoride (SF6)
☑ Nitrogen trifluoride (NF3)
☑ Carbon dioxide equivalent (CO₂e)
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
76. Are targets derived using a sectoral decarbonization approach recommended or required to be validated by a third-party?
● No
o Recommended
• Required

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
o 2041-2050
○ Other
None specified
79. What is the recommended or required timeframe for long-term targets (e.g. by 2050, 2060)?
o Between 2030 and 2035
o Between 2036 and 2040
o Between 2041 and 2045
o Between 2046 and 2050
o Between 2051 and 2060
o 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

80. What is the recommended or required baseline year from which progress is to be measured?
○ 1990-2000
○ 2001-2005
○ 2006-2010
o 2011-2015
○ 2016-2020
Other Not specified
81. Are entities recommended or required to disclose the methodologies by which they select baseline years?
No     No
○ Recommended
○ Required
82. What is the recommended or required level of ambition for GHG emissions reductions targets?
o Reduction between 1-25%
o Reduction between 26-50%
o Reduction between 51-75%
o Reduction between 75-85%
o Reduction between 85-100%
o Reduction of more than 100%
• Other <u>The Resolution does not set an specific level of ambition required or recommended. IFRS S2</u> 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)
$\Box$ 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)
$\Box$ 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
o Externally-defined material risk
o 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?
o No
o Recommended
Required
89. Are entities recommended or required to disclose their methodology for scenario analysis with relation to physical risk?
o No
o Recommended
Required
90. Are risk assessments of physical risk recommended or required to be third-party verified?
No
o Recommended
o Required
Disclosure of Transition Risk
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
o Externally-defined material risk
o 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
o Recommended
95. Are transition risk assessments recommended or required to be third-party verified?
No     No
∘ Recommended
o Required
96. Are entities recommended or required to disclose their methodology for scenario analysis related to transition risk?
∘ No
∘ Recommended
Required
Disclosure of Transition Plans
98. What is the recommended or required frequency of transition plan disclosures?

o Yearly
o Every two years
o Every three years
o Every four years
o Every five years
o Every ten years or more
○ Other
<ul><li>Not specified</li></ul>
99. Does the policy tool recommend or require audited accuracy and/or third-party verification of the transition plan?
No
∘ Recommended
o Required
100. Does the policy tool recommend or require entities to disclose progress in implementing transition plans?
o No
∘ Recommended
Required
101. What is the recommended or required frequency of disclosures related to transition plan implementation progress?
∘ Yearly
o Every two years
o Every three years
o Every four years

o Every five years
o Every ten years or more
o 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	<b>☑</b>		
2. Remuneration based on achieving climate-related goals	✓		

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

\_\_\_\_\_

100. Is third-party verification of climate-related opportunities recommended of required?
No     No
o Recommended
o 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).
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.
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)
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)

Standards, Frameworks	s, and Guidelines		
125. Does the policy tool	require the use of	or make reference to any of	the following standards,
frameworks, or guideline	•		<b>5</b>
, <b>J</b>	-		
	Required	Referenced	Neither required nor
1 IEDC C1			referenced
1. IFRS S1	<u>✓</u>		
2. IFRS S2	<b>✓</b>		
3. Task Force on	✓		
Climate-related Financial Disclosures			
(TCFD)			
4. GHG Protocol	<b>V</b>		
Corporate Accounting			
and Reporting			
Standard			
5. GHG Protocol	<b>V</b>		
Corporate Value Chain			
(Scope 3) Accounting			
and Reporting			
Standard			
6. CDP (formerly			
known as Climate			
Disclosure Project) reporting framework			
7. International			<b>✓</b>
Integrated Reporting			
Framework			
8. Global Reporting			V
Initiative (GRI)			
9. Sustainability			v
Accounting Standards			
Board (SASB)			
10. European			
Sustainability			
Reporting Standards (ESRS)			
11. Taskforce on			<b>✓</b>
Nature-related			<u> </u>
Financial Disclosures			
(TNFD)			
12. Partnership for			<b>V</b>
Carbon Accounting			
Financials (PCAF)			

Alliance for Net Zero (GFANZ)			
(GFANZ) 14. Other			
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.

<u>None</u>

# Policy Tool Name: CVM Resolution 80

3. Source material link(s): https://web.archive.org/web/20240822045020/https://conteudo.cvm.gov.br/legislacao/resolucoes/resolu80.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
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
7. Status of the policy tool
• Approved, in force
Approved, not yet in force
o Other (Please describe)
9. Year of (planned) entry into force or year of publication
<u>2022</u>

10. Does the policy tool have an end date?
● No
o Yes
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
<u>disclosure.</u>
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
o 2.
∘ 3.
o <b>4</b> .
o 5.
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.
o O- No Capacity (Please explain)
o 1- Low Capacity (Please explain)
o 2- Medium Capacity (Please explain)

prosecute the market play	ers on its matters.		
o Prefer not to answer			
o Not Applicable			

• 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

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	<b>V</b>		
entities			
2. Private companies			✓
3. Financial institutions			V
4. Small and medium-			<b>V</b>
sized enterprises			
5. State-owned			<b>▼</b>
companies			
6. Not-for-profit			✓
organizations			
7. Government			abla
agencies and/or			
departments			
(supranational)			
8. Government			abla
agencies and/or			
departments (national)			
9. Government			abla
agencies and/or			
departments (regional			
- e.g., state, province,			
region, metropolitan			
region)			
10. Government			<b>✓</b>
agencies and/or			
departments (local - e.g., county, district,			
municipality, city)			
11. Government			<u> </u>
agencies and/or			<b>▼</b>
agencies ana/or			

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	or whom or instances in	n which compliance is
12. Sectoral actors (e.g., healthcare, defense, utilities, education)  13. Other  27. Describe the threshold criteria to identify entities formandatory.  Pu 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  28. Can entities for whom compliance with the policy to comply or explain)?  No		
(e.g., healthcare, defense, utilities, education)  13. Other  27. Describe the threshold criteria to identify entities formandatory.  Puting 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  28. Can entities for whom compliance with the policy to comply or explain)?  No		
defense, utilities, education)  13. Other  27. Describe the threshold criteria to identify entities formandatory.  Pu 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  28. Can entities for whom compliance with the policy to comply or explain)?  No		
education)  13. Other  27. Describe the threshold criteria to identify entities formandatory.  Put 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 are requirements  28. Can entities for whom compliance with the policy to comply or explain)?  No		
27. Describe the threshold criteria to identify entities formandatory.  Put 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  28. Can entities for whom compliance with the policy to comply or explain)?  No		
27. Describe the threshold criteria to identify entities for mandatory.  Put 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  28. Can entities for whom compliance with the policy to comply or explain)?  No		
mandatory.    Pu		n which compliance is
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  28. Can entities for whom compliance with the policy to comply or explain)?  No	ublicly-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  28. Can entities for whom compliance with the policy to comply or explain)?  No		
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  28. Can entities for whom compliance with the policy to comply or explain)?  No		
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 to comply or explain)?  No		
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 to comply or explain)?  No		
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 to comply or explain)?  No		
Entity is headquartered in the jurisdiction  Entities are subjected to disclosure or reporting requirements  28. Can entities for whom compliance with the policy to comply or explain)?  No		
Entities are subjected to disclosure or reporting requirements  28. Can entities for whom compliance with the policy to comply or explain)?  No		
requirements co  28. Can entities for whom compliance with the policy to comply or explain)?   No		
28. Can entities for whom compliance with the policy to comply or explain)?	ne regulation is applica	ıble to all publicly held
comply or explain)?  • No	mpanies.	
Yes	cool is mandatory opt c	out of the obligation (e.g.
29. Describe the available opt-out provisions (e.g. "com section/subsection/paragraph of the policy tool.	nply or explain"), refere	encing the relevant
The ESG disclosure is mandatory to all publicly held contour to comply with the policy as long as it explains the reas documents (formulário de referência). The relevant sec		ing in the disclosure
provides for the items of the reference form that may b 7.2, and 8.1).	son for not implementi	

entities' operations beyond the jurisdiction?
o Operations within jurisdiction only
o 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 <u>Up to R\$ 50 million</u>
☑ Restriction on business activities <u>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</u>
□ Voiding or setting aside of contract
□ Exclusion from government contracts
☐ Award of damages or compensation
☑ Penalty for senior managers <u>Breach of the fiduciary duties and disclosure obligations applicable to the managers may be prosecuted by the CVM</u>
☐ 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:
o Below average
○ Average
Above average
o 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.
o Below average
o Average
o Above average
o 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
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.
41. Does the policy tool recommend or require periodic impact assessments?

No     No
o Recommended
o Required
43. Does the policy tool recommend or require periodic reviews?
No
o Recommended
o Required
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?

	Recommended	Required	Neither recommended nor required
1. Greenhouse gas		V	
(GHG) emissions 2. GHG emissions			✓
offsets or removals			
3. GHG emissions			Ø
reduction targets			
4. Other climate-			$\square$
related targets			
5. Physical climate risk		<u> </u>	
6. Transition risk 7. Transition plan			
Disclosure of Greenhous	e Gas (GHG) Emissio	ns	
54. Which GHG emission			
54. Which GHG emission ☑ Carbon dioxide (CO2) ☑ Methane (CH4)			
54. Which GHG emission ☑ Carbon dioxide (CO2) ☑ Methane (CH4) ☑ Nitrous oxide (N2O)	s must be disclosed? S		
Disclosure of Greenhous  54. Which GHG emission  ☑ Carbon dioxide (CO₂)  ☑ Methane (CH₄)  ☑ Nitrous oxide (N₂O)  ☑ Hydrofluorocarbons (⊢	s must be disclosed? S		
54. Which GHG emission ☑ Carbon dioxide (CO2) ☑ Methane (CH4) ☑ Nitrous oxide (N2O)	s must be disclosed? S		
54. Which GHG emission  ☑ Carbon dioxide (CO2)  ☑ Methane (CH4)  ☑ Nitrous oxide (N2O)  ☑ Hydrofluorocarbons (FC)  ☑ Perfluorocarbons (PFC)	s must be disclosed? S IFCs) s)		
54. Which GHG emission ☑ Carbon dioxide (CO2) ☑ Methane (CH4) ☑ Nitrous oxide (N2O) ☑ Hydrofluorocarbons (H	s must be disclosed? S IFCs) s) SF6)		

No
○ Recommended
○ Required
56. Are entities recommended or required to disclose net emissions?
No
○ Recommended
o 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?
No
59. Does the policy tool recommend or require the GHG inventory be third-party verified?
No     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
o Externally-defined material risk
o 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     No
o Recommended
o Required

No
94. Are entities recommended or required to disclose the results of climate-related risk stress tests that are related to transition risk?
o Other (Describe)
o Externally-defined material risk
● Self-assessed material risk
93. What is the materiality standard for the disclosure of transition risk?
□ Risks that the disclosing entity's transition may pose to society (double materiality)
☑ Risks that societal transitions may pose to the disclosing entity
92. What types of transition risk must be disclosed? Select all that apply
Disclosure of Transition Risk
o Required
Recommended     Required
● No
90. Are risk assessments of physical risk recommended or required to be third-party verified?
o Required
<ul> <li>Recommended</li> </ul>
No
89. Are entities recommended or required to disclose their methodology for scenario analysis with relation to physical risk?

o Recommended			
o Required			
95. Are transition risk asse	essments recommended o	or required to be third-par	ty verified?
● No			
o Recommended			
o Required			
96. Are entities recommer to transition risk?	nded or required to disclos	se their methodology for s	cenario analysis related
No			
o Recommended			
o Required			
Other disclosures			
105. Are targeted entities	recommended or required	d to disclose any other clir	mate-related
information? Select all tha	at apply.		
	Required	Recommended	Neither recommended

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

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

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

No

 $\circ \ Recommended$ 

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			<b>I</b>
2. IFRS S2			<b>V</b>
3. Task Force on Climate-related Financial Disclosures (TCFD)			
4. GHG Protocol Corporate Accounting and Reporting Standard			V
5. GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard			
6. CDP (formerly known as Climate Disclosure Project) reporting framework			
7. International Integrated Reporting Framework			$\square$
8. Global Reporting Initiative (GRI)			✓

9. Sustainability Accounting Standards		
Board (SASB)		
10. European		<b>V</b>
Sustainability		
Reporting Standards (ESRS)		
11. Taskforce on		☑
Nature-related		
Financial Disclosures (TNFD)		
12. Partnership for		<b>✓</b>
Carbon Accounting		
Financials (PCAF)		
13. Glasgow Financial		<b>☑</b>
Alliance for Net Zero		
(GFANZ)		
14. Other		
Additional Important Inf	ormation	
Additional important im	Offication	

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.

<u>None</u>

## 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
4. Which of the following governance domains does this policy tool relate to? Select all that apply.
☐ Climate-related disclosure
☑ Transition planning
☐ Public procurement
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
☐ Ministry/Department/Agency
□ Other (Please describe)
7. Status of the policy tool
Approved, in force
o Approved, not yet in force
o Other (Please describe)
9. Year of (planned) entry into force or year of publication  2024

No     No					
∘ Yes					
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 guid of implementing measure economic and infrastructuclimate change.	s to reduce the vulnerabil	ty and exposure to risks o	of environmental, social,		
13. Name the authority(ie applicable, leave blank.	s) responsible for oversee	ing implementation and/c	or enforcement. If not		
o 1.					
∘ 2.					
∘ 3.					
o <b>4</b> .					
o 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			☑		

10. Does the policy tool have an end date?

2. Private companies

**√** 

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

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			<u> </u>		
Entities are subjected	The law does not	The law does not	The law does not		
to disclosure or	define a threshold. It	define a threshold. It	define a threshold. It		
reporting requirements	applies to all levels of	applies to all levels of	applies to all levels of		
	government.	government.	government.		
<ul><li>No</li><li>Yes</li></ul>					
30. Does the policy tool exentities' operations beyon		s' domestic operations, or	does it also apply to		
<ul><li>Operations within jurison</li></ul>	diction only				
o Operations beyond the	jurisdiction				
Not applicable					
32. What are the sanction	ns for non-compliance? So	elect all that apply and de	escribe in the text field.		
☐ Monetary fine					
□ Restriction on business activities					
□ Voiding or setting aside	e 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:
o Below average
∘ Average
Above average
o 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.
o Below average
∘ Average
Above average
o 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     No
o Yes
41. Does the policy tool recommend or require periodic impact assessments?
∘ No
○ Recommended
Required
42. Select the option that best describes the frequency of periodic impact assessments recommended or required by the policy tool.
o 0-2 years
● 2-5 years
o 5-10 years
o 10 or more years
○ Not specified
o Other
43. Does the policy tool recommend or require periodic reviews?
∘ No
∘ Recommended
Required

Disclosure of Plans and Targets
Domain-Specific Questions: Transition Planning Questions
o Yes
No No
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.)?
o Yes
No     No
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.)?
o <b>Other</b>
Not specified
o 10 or more years
o 5-10 years
● 2-5 years
o 0-2 years
44. Select the option that best describes the frequency of the recommended or required periodic reviews.

transition plans?
No     No
o Recommended
o Required
Targets
135. Does the policy tool recommend or require targeted entities to have or develop climate-related
targets?
No
○ Recommended
o Required
Transition Plans
164. Does the policy tool recommend or require targeted entities to have or develop a transition plan
• No
• Recommended
Required

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

165.	Does the policy	tool recommend	or require any	of the following	elements or	criteria fo	r transition
plan	s? Select all that	t apply.					

	Recommended	Required	Neither recommended nor required		
A timeframe for the transition plan (e.g. 10 year plan, 20 year plan, etc.)			☑		
Key Performance Indicators (KPIs) for monitoring transition plan implementation			<b>V</b>		
Updates to the transition plan		V			
Third-party verification and/or audited accuracy of the transition plan			Ø		
Identified methodology for scenario analysis			☑		
168. Select the option that best describes the recommended or required frequency of updates to transition plans.  o 0-2 years  o 2-5 years  o 5-10 years  o 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.					

·	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		✓				
Develop financial plans for the implementation of their transition plan			☑			
Integrate climate- related matters into their financial accounting						
Incorporate climate change considerations into their investment decision making and/or asset planning			☑			
Incorporate climate change considerations into their capital allocation and/or expenditure plans						
Any other mechanisms for enhancing the achievement of targets and/or the implementation of transition plans			✓			

Monitoring, Oversight, and Implementation

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 parag	raph, establishes that	the adaptation plans	shall establish indicators for		
monitoring and evaluating their implementation.					
Francisco est Labbition	1 C				
Engagement, Lobbying,	and Governance				
184. Does the policy tool	•	•	, ,		
engagement and/or gove	rnance practices with	their targets and/or t	ransition plans?		
	Recommended	Required	No		
Value chain			☑		
engagement Investor engagement			✓		
Consumer			<u> </u>		
engagement					
Policy engagement					
and lobbying practices  Corporate governance					
structure for transition					
and verification		_			
Climate-related financial incentives for					
employees and board					
members					
185. Does the policy tool	recommend or require	e targeted entities to d	lisclose how they have used due		
diligence and/or steward	ship to achieve their to	argets and/or impleme	ent their transition plans?		
No					
o 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			✓	
IFRS S2			<b>V</b>	
Task Force on Climate-related Financial Disclosures (TCFD)				
CDP (formerly known as Climate Disclosure Project) Technical Note: Reporting on Climate Transition Plans				
International Integrated Reporting Framework			abla	
Global Reporting Initiative (GRI)			<b>☑</b>	
Sustainability Accounting Standards Board (SASB)			☑	
Science Based Targets initiative (SBTi)			Ø	
Science Based Targets initiative (SBTi) Net Zero Standard			☑	
European Sustainability Reporting Standards (ESRS)				
Other			<b>V</b>	
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.

<u>None</u>

## Policy Tool Name: SUSEP Circular No. 666

<ol> <li>Source material link(s): https://web.archive.org/web/20240823011335/https://www2.susep.gov.br/safe/scripts/bnweb/bnmcpi.exe?router=upload/26128</li> </ol>
4. Which of the following governance domains does this policy tool relate to? Select all that apply.
☑ Climate-related disclosure
□ Transition planning
□ Public procurement
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
☐ Ministry/Department/Agency
☑ Other (Please describe) <u>Superintendency of Private Insurance (SUSEP)</u>
7. Status of the policy tool
o Approved, in force
o Approved, not yet in force
● Other (Please describe)
9. Year of (planned) entry into force or year of publication  2022

10. Does the policy tool have an end date?
No     No
o Yes
12. Driefly describe the malicy to all and describe and
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.
<u>Circular establishes mechanisms for mapping and managing sustainability risks by insurance companies, open supplementary pension entities (EAPCs), capitalization companies and local reinsurers.</u>
13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.
● 1. <u>Superintendency of Private Insurance (SUSEP)</u>
○ 2.
∘ 3.
o 4.
o 5.
15. To provide contextual information, rate the capacity of Superintendency of Private Insurance (SUSEP) to undertake the policy tool's implementation and/or enforcement.
o O- No Capacity (Please explain)
o 1- Low Capacity (Please explain)
o 2- Medium Capacity (Please explain)
• 3- High Capacity (Please explain) <u>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.</u>

o Prefer not to answer

o Not Applicable			
Note: With regard to	sectoral actors, in cases	v tool? Select all that apply	untary obligations are
further opportunity to cla	· ·	or another), select "mandat	cory" as there will be
	Mandatory	Voluntary	Not targeted
1. Publicly-traded			✓ ✓
entities			
2. Private companies			<b>V</b>
3. Financial institutions			☑
4. Small and medium-			
sized enterprises			
5. State-owned			
companies			
6. Not-for-profit			<b>V</b>
organizations			
7. Government			<b>V</b>
agencies and/or			
departments			
(supranational)			
8. Government			<b>☑</b>
agencies and/or			
departments (national)			
9. Government			☑
agencies and/or			
departments (regional			
- e.g., state, province,			
region, metropolitan			
region)		_	
10. Government			<b>7</b>
agencies and/or			
departments (local -			
e.g., county, district, municipality, city)			
11. Government			
agencies and/or			
departments			
(unspecified)			
12. Sectoral actors	<b>V</b>		
(e.g., healthcare,			

defense, utilities, education)

26. In cases where entitie	es are targeted by se	ector, identify the sector t	o which the policy tool applies.
	Mandatory	Voluntary	Not applicable
All sectors			✓ ✓
Agriculture, forestry,			
and fishing			<u>~</u>
Mining and quarrying			<b>V</b>
Manufacturing			<b>Z</b>
Electricity, gas, steam,			<b>☑</b>
and air conditioning			
supply			
Water supply;			V
sewerage; waste			
management and			
remediation activities			
Construction			<b></b>
Wholesale and retail			abla
trade: repair of motor			
vehicles and			
motorcycles			
Transportation and			<b></b>
storage			
Accommodation and			☑
food service activities			
Information and			☑
communication			
Financial and	<b>V</b>		
insurance activities			
Real estate activities			☑
Professional, scientific			☑
and technical activities			
Administrative and			☑
support service			
activities			
Public administration			
and defense;			
compulsory social			
security	<del> </del>		
Education			<u> </u>
Human health and			
social work activities	<del> </del>		
Arts, entertainment			
and recreation			
Other service activities			✓

13. Other

Activities of households as employers; undifferentiated goods-and services-producing activities of households for own use			
Activities of extraterritorial organizations and bodies			☑
27. Describe the threshol mandatory.	d criteria to identify entitio	es for whom or instances i	
		Sectoral actors (e.g. healthcare, defense, utilities, education)	
Minimum number of employees (Enter min number of full-time employees - FTEs)		danties, education)	
Minimum revenue (Enter	<u> </u>		
Minimum assets (Enter I Minimum contract value contract value)			
Entity is headquartered			
Entities are subjected to disclosure or reporting requirements		The regulation is applicable to all insurance and reinsurance companies.	
28. Can entities for whon comply or explain)?	n compliance with the pol	icy tool is mandatory opt c	out of the obligation (e.g.
Yes			
29. Describe the available section/subsection/parag	· · · · · · · · · · · · · · · · · · ·	'comply or explain"), refere	encing the relevant

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.
30. Does the policy tool exclusively apply to entities' domestic operations, or does it also apply to entities' operations beyond the jurisdiction?
o Operations within jurisdiction only
o 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:
o Below average
○ Average
Above average
o 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.
o Below average
∘ Average
Above average
o Not applicable
● Unknown or prefer not to answer
37. Have the climate-specific provisions in this instrument ever been enforced?
<ul><li>No (If relevant, explain)</li></ul>
∘ Yes
39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool?
No     No
∘ Yes
41. Does the policy tool recommend or require periodic impact assessments?
No
○ Recommended
o Required
43. Does the policy tool recommend or require periodic reviews?

∘ No
∘ Recommended
Required
44. Select the option that best describes the frequency of the recommended or required periodic reviews.
o 0-2 years
● 2-5 years
o 5-10 years
○ 10 or more years
○ Not specified
○ Other
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     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			
\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	2		
What is being disclosed			
<del>-</del>		ired to disclose any of	the following climate-related
information? Select all the	at apply.		
	Recommended	Required	Neither recommended nor required
1. Greenhouse gas			✓
(GHG) emissions			
2. GHG emissions			☑
offsets or removals 3. GHG emissions			
reduction targets			
4. Other climate-			✓
related targets			
5. Physical climate risk		<b></b> ✓	
6. Transition risk			
7. Transition plan			<u> </u>
			· · · · · · · · · · · · · · · · · · ·
Disclosure of Physical R	isk		
86. What types of physic	al risk must he disclos	sed?	
oo. What types of physic	ar risk must be disclos	ica.	
☑ To company			
☐ To society (double mat	teriality)		
, , , , , , , , , , , , , , , , , , , ,	· ·		
97 What is the materiali	ty standard for the dis	eclasura of physical risk	<i>,</i> ?
87. What is the materiali		sciosure or priysical fisk	<b>\</b> :
<ul><li>Self-assessed materia</li></ul>	l risk		
o Externally-defined mat	erial risk		

o 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
o Recommended
o Required
89. Are entities recommended or required to disclose their methodology for scenario analysis with relation to physical risk?
No
o Recommended
o Required
90. Are risk assessments of physical risk recommended or required to be third-party verified?
No     The state of th
<ul> <li>Recommended</li> </ul>
o Required
Disclosure of Transition Risk
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
o Externally-defined material risk
o 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     No
○ Recommended
∘ Required
96. Are entities recommended or required to disclose their methodology for scenario analysis related to transition risk?
No     No
○ Recommended
∘ Required

Other disclosures

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

13. Climate-related			<b>V</b>		
lobbying and/or policy engagement					
14. Locked-in			<b>7</b>		
emissions or					
information on					
emissive assets with					
long lifespans					
15. Dirty asset			abla		
divestiture					
16. Nature-related			abla		
impacts					
17. Just transition indicators			<b>☑</b>		
maicators					
106. Is third-party verific	ation of climate-related op	portunities recommended	l or required?		
O N -					
No					
o Recommended					
a. Da avvina d					
<ul><li>Required</li></ul>					
Standards, Frameworks	and Guidolines				
Standards, Frameworks	, und Guidennes				
125. Does the policy tool require the use of or make reference to any of the following standards,					
frameworks, or guideline	-	, , , , , , , , , , , , , , , , , , , ,	<b>.</b>		
mame works, or galacime	o. Sciect an triat appry.				
	Required	Referenced	Neither required nor		
			referenced		
1. IFRS S1			<b>V</b>		
2. IFRS S2			<b>V</b>		
3. Task Force on			✓		
Climate-related		<b>U</b>	V		
Climate-related			▼.		
Financial Disclosures			<u> </u>		

Corporate Accounting and Reporting Standard

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

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.

<u>None</u>

## 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/exiberormativo?tipo=Resolu%C3%A7%C3%A3o%20BCB№=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
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) <u>Brazilian Central Bank</u>
7. Status of the policy tool
Approved, in force
o Approved, not yet in force
o Other (Please describe)
9. Year of (planned) entry into force or year of publication  2021

10. Does the policy tool have an end date?
No
o Yes
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.
13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.
● 1. <u>Brazilian Central Bank</u>
∘ 2.
∘ 3.
o <b>4</b> .
o 5.
15. To provide contextual information, rate the capacity of Brazilian Central Bank to undertake the policy tool's implementation and/or enforcement.
o O- No Capacity (Please explain)
o 1- Low Capacity (Please explain)
o 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.

o Prefer not to answer

o 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			
•	r one sector, voluntary	for another), select "manda	
	Mandatory	Voluntary	Not targeted
1. Publicly-traded entities			✓
2. Private companies			<b>V</b>
3. Financial institutions	<b>☑</b>		
4. Small and medium- sized enterprises			V
5. State-owned companies			☑
6. Not-for-profit organizations			☑
7. Government agencies and/or departments (supranational)			
8. Government agencies and/or departments (national)			V
9. Government agencies and/or departments (regional - e.g., state, province, region, metropolitan region)			V
10. Government agencies and/or departments (local - e.g., county, district, municipality, city)			<b>☑</b>
11. Government agencies and/or departments (unspecified)			☑
12. Sectoral actors (e.g., healthcare, defense, utilities,			☑

education)

13. Other			
27. Describe the threshold	d criteria to identify entitie	es for whom or instances	in which compliance is
mandatory.	a circoina to idonain, circuit		
		Financial institutions	
Minimum number of emp	- ·		
number of full-time emp			
Minimum revenue (Enter	-		
Minimum assets (Enter r	,		
Minimum contract value	(Enter minimum		
contract value)	in the jurisdiction		_
Entity is headquartered Entities are subjected to		The regulation is applica	able to almost all
requirements	disclosure of reporting	financial companies, ex	
requirements		in the s5 segment consi	
		having a simplified risk	•
28. Can entities for whom	compliance with the pol	icy tool is mandatory opt (	out of the obligation (e.g.
comply or explain)?			
No     No			
∘ Yes			
○ Tes			
30. Does the policy tool ex	xclusively apply to entities	s' domestic operations, or	does it also apply to
entities' operations beyon	nd the jurisdiction?		
Operations within jurisce	liction only		
o Operations within jurisdiction only			
o 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:
o Below average
o Average
Above average
o 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.
o Below average
o Average
o Above average
o Not applicable
<ul><li>Unknown or prefer not to answer</li></ul>
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     No
∘ Yes
41. Does the policy tool recommend or require periodic impact assessments?
No     No
∘ Recommended
o Required
43. Does the policy tool recommend or require periodic reviews?
No     No
∘ Recommended
∘ Required
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     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 Questio	ns: Disclosure Questic	ons	
	_		
What is being disclosed	?		
52. Are targeted entities	recommended or requ	ired to disclose any of	the following climate-related
information? Select all the	at apply.		
	Recommended	Required	Neither recommended nor required
1. Greenhouse gas (GHG) emissions		<b>V</b>	
2. GHG emissions		<b>V</b>	
offsets or removals			
3. GHG emissions reduction targets			
4. Other climate-			<b>✓</b>
related targets			
5. Physical climate risk		<b></b> ✓	
		<b>V</b>	
7. Transition plan			✓
5. Physical climate risk 6. Transition risk 7. Transition plan  Disclosure of Greenhous			
54. Which GHG emission	s must be disclosed? S	Select all that apply.	
☑ Carbon dioxide (CO <sub>2</sub> )			

☑ Methane (CH₄)
☑ Nitrous oxide (N₂O)
☑ Hydrofluorocarbons (HFCs)
☑ Perfluorocarbons (PFCs)
☑ Sulphur hexafluoride (SF6)
☑ Nitrogen trifluoride (NF3)
☑ Carbon dioxide equivalent (CO2e)
55. Are entities recommended or required to disclose gross emissions?
o No
∘ Recommended
Required
56. Are entities recommended or required to disclose net emissions?
∘ No
o 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     No
○ Recommended
○ Required
60. If necessary, provide additional clarification to the above responses aboutgreenhouse 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
o 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     No
o Recommended (Please describe and reference the relevant section/subsection/paragraph of the policy tool)
o Required (Please describe and reference the relevant section/subsection/paragraph of the policy tool)
64. Does the policy tool recommend or require any certification standards for the use of GHG offsetting or removals?
No     No
o Recommended (Please list the certification standards, describe their use, and reference the relevant section/subsection/paragraph of the policy tool)
o Required (Please describe and reference the relevant section/subsection/paragraph of the policy tool)
65. Does the policy tool include any other recommendations or requirements regarding the appropriate use of offsets?
No     No
o Recommended (Please describe and reference the relevant section/subsection/paragraph of the policy tool)
o Required (Please describe and reference the relevant section/subsection/paragraph of the policy tool)
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     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** 

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
o Externally-defined material risk
o 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
<ul><li>Required</li></ul>
95. Are transition risk assessments recommended or required to be third-party verified?
No     No
∘ Recommended
∘ Required
96. Are entities recommended or required to disclose their methodology for scenario analysis related to transition risk?
No     No
o Recommended

o Required			
Other disclosures			
105. Are targeted entities information? Select all the		d to disclose any other cli	mate-related
	Required	Recommended	Neither recommended nor required
1. Climate-related opportunities			V
2. Remuneration based on achieving climate-related goals			☑
3. Taxonomies			☑
4. Capital allocation and/or expenditure plans (in the context of climate change)			V
5. Due diligence			✓
6. Assumptions and Dependencies			V
7. Data limitations of scenario analyses			☑
8. Financial implications of climate-related matters (e.g., integration of climate-related disclosures into financial accounting standards)			☑
9. Stewardship (e.g., whether stewardship codes are in place, how entities vote in shareholder meetings,			☑

**√** 

etc.) 10. ESG

methodologies and criteria (in the case of

service providers)

11. Asset planning or ownership in the			☑
context of climate			
change			
12. Sectoral			☑
investment policies			
13. Climate-related			✓
lobbying and/or policy			
engagement			
14. Locked-in			☑
emissions or			
information on			
emissive assets with			
long lifespans			
15. Dirty asset			$\square$
divestiture			
16. Nature-related			☑
impacts			
17. Just transition			☑
indicators			
Standards, Frameworks, and Guidelines			
12E. Describe religion to all require the use of an medic reference to any of the following standards			
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.			
Traineworks, or guidelines? Select all that apply.			
	Required	Referenced	Neither required nor
			referenced
1. IFRS S1			<b>V</b>
2. IFRS S2			<b></b>
3. Task Force on			<b>V</b>
Climate-related			
Financial Disclosures			

**√** 

**√** 

(TCFD)

4. GHG Protocol

and Reporting Standard

5. GHG Protocol

and Reporting Standard

Corporate Accounting

Corporate Value Chain (Scope 3) Accounting

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

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.

<u>None</u>

## 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/exiberormativo?tipo=Resolu%C3%A7%C3%A3o%20BCB№=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
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) <u>Brazilian Central Bank</u>
7. Status of the policy tool
<ul><li>Approved, in force</li></ul>
<ul><li>Approved, not yet in force</li></ul>
<ul><li>Other (Please describe)</li></ul>
9. Year of (planned) entry into force or year of publication  2021

10. Does the policy tool have an end date?
● No
o Yes
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.
13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.
○ 2.
○ 3.
o 4.
o 5.
15. To provide contextual information, rate the capacity of Brazilian Central Bank to undertake the policy tool's implementation and/or enforcement.
o O- No Capacity (Please explain)
o 1- Low Capacity (Please explain)
o 2- Medium Capacity (Please explain)
• 3- High Capacity (Please explain) <u>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.</u>

o Prefer not to answer

o Not Applicable				
25. Which entities are tar	rgeted through this	policy tool? Select all that	t apply.	
•		•	and voluntary obligations are	
		ary for another), select "n	nandatory" as there will be	
further opportunity to cla	rity.			
	Mandatory	Voluntary	Not targeted	
1. Publicly-traded			V	
entities				
2. Private companies			V	
3. Financial institutions	V			
4. Small and medium-			V	
sized enterprises				
5. State-owned			✓	
companies				
6. Not-for-profit			✓	
organizations				
7. Government			✓	
agencies and/or				
departments				
(supranational)				
8. Government			☑	
agencies and/or				
departments (national)  9. Government	<del>                                     </del>			
agencies and/or				
departments (regional				
- e.g., state, province,				
region, metropolitan				
region)				
10. Government			V	
agencies and/or				
departments (local -				
e.g., county, district,				
municipality, city)				
11. Government			☑	
agencies and/or				
departments				
(unspecified)				
12. Sectoral actors			☑	
(e.g., healthcare,				

defense, utilities, education)

13. Other			
27. Describe the threshold	d criteria to identify entiti	es for whom or instances	in which compliance is
mandatory.	·		·
		Financial institutions	
Minimum number of emp	•		
Minimum revenue (Enter	,		
Minimum assets (Enter n			
Minimum contract value contract value)	(Enter minimum		
Entity is headquartered i	n 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 comply or explain)?	compliance with the pol	icy tool is mandatory opt	out of the obligation (e.g.
o 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?			
o Operations within jurisd	iction only		

o 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:
o Below average
∘ Average
Above average
o Not applicable
<ul><li>Unknown or prefer not to answer</li></ul>
35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority.
o Below average
∘ Average

o Above average
o 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     No
∘ Yes
41. Does the policy tool recommend or require periodic impact assessments?
No     No
○ Recommended
o Required
43. Does the policy tool recommend or require periodic reviews?
○ No
o Recommended
Required
44. Select the option that best describes the frequency of the recommended or required periodic

reviews.

● 0-2 years
o 2-5 years
o 5-10 years
○ 10 or more years
○ Not specified
○ Other
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     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     No
∘ Yes
Domain-Specific Questions: Disclosure Questions
What is being disclosed?

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

	Recommended	Required	Neither recommended
1 Carrel and a second			nor required
1. Greenhouse gas (GHG) emissions			<b>V</b>
2. GHG emissions offsets or removals			V
3. GHG emissions			<b>V</b>
reduction targets			
4. Other climate-			<b>V</b>
related targets			
5. Physical climate risk		V	
6. Transition risk		V	
7. Transition plan			✓
Disclosure of Physical Ri			
86. What types of physical	al risk must be disclosed	d?	
☑ To company			
□ To society (double materiality)			
87. What is the materiality standard for the disclosure of physical risk?			
<ul><li>Self-assessed material</li></ul>	risk		
o Externally-defined material risk			
o 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?			
o No			
o 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
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
o Externally-defined material risk
o Other (Describe)

94. Are entities recomme that are related to transit	nded or required to disclo	se the results of climate-re	elated risk stress tests
∘ No			
o Recommended			
Required			
·			
95. Are transition risk ass	sessments recommended	or required to be third-par	ty verified?
No			
o Recommended			
∘ Required			
·			
96. Are entities recomme to transition risk?	nded or required to disclo	se their methodology for s	cenario analysis related
∘ No			
<ul><li>Recommended</li></ul>			
∘ Required			
Other disclosures			
Other disclosures			
105. Are targeted entities recommended or required to disclose any other climate-related information? Select all that apply.			
	Required	Recommended	Neither recommended
1. Climate-related	<b>□</b>		nor required
opportunities			
2. Remuneration			V
based on achieving climate-related goals			

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

\_\_\_\_\_

\_\_\_\_\_

100. Is third-party verification of climate-related opportunities recommended of required:
No     No
o Recommended
o 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 responsabilities and procedures to asses 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	

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.

<u>None</u>

## 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
4. Which of the following governance domains does this policy tool relate to? Select all that apply.
☐ Climate-related disclosure
☑ Transition planning
☐ Public procurement
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
☐ Ministry/Department/Agency
□ Other (Please describe)
7. Status of the policy tool
Approved, in force
o Approved, not yet in force
o Other (Please describe)
9. Year of (planned) entry into force or year of publication
2009

No			
∘ Yes			
12. Briefly describe the po	olicy tool's goal and/or pur	pose:	
For example: The policy recommendations of the Tabsence of such disclosur	Γask Force for Climate Rel	ed companies to comply v lated Financial Disclosure	
The Law establishes the Nobjectives, guidelines and and social development c	instruments necessary fo	or its execution with the ai	m of making economic
13. Name the authority(ie applicable, leave blank.	s) responsible for oversee	ing implementation and/c	r enforcement. If not
○ 1.			
○ 2.			
○ 3.			
o 4.			
∘ 5.			
25. Which entities are tare	geted through this policy	tool? Select all that apply.	
mixed (e.g., mandatory fo	r one sector, voluntary for	where mandatory and vol another), select "mandat	, ,
further opportunity to clar	Tity.		
	Mandatory	Voluntary	Not targeted
1. Publicly-traded entities			☑

10. Does the policy tool have an end date?

2. Private companies

3. Financial institutions

**√** 

**√** 

4. Small and medium- sized enterprises			V
5. State-owned			
	☑		
companies			
6. Not-for-profit			V
organizations			<u> </u>
7. Government	$\square$		
agencies and/or			
departments			
(supranational)			
8. Government	☑		
agencies and/or			
departments (national)			
9. Government	$\square$		
agencies and/or			
departments (regional			
- e.g., state, province,			
region, metropolitan			
region)			
10. Government	☑		
agencies and/or			
departments (local -			
e.g., county, district,			
municipality, city)			
11. Government	V		
agencies and/or		_	
departments			
(unspecified)			
12. Sectoral actors			
(e.g., healthcare,			
defense, utilities,			
education)			
13. Other	П	П	П
15. Other		Ш	

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

	Mandatory	Voluntary	Not applicable
All sectors			
Agriculture, forestry, and fishing	V		
Mining and quarrying	✓		
Manufacturing	<b>V</b>		
Electricity, gas, steam, and air conditioning supply			

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

\_\_\_\_\_

\_\_\_\_\_

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

	State- owned compani es	Governmen t agencies and/or department s (supranatio nal)	Governm ent agencies and/or departme nts (national)	Governm ent agencies and/or departme nts (regional - e.g. state, province, region, metropolit an region)	Governm ent agencies and/or departme nts (local - e.g. county, district, municipali ty, city)	Governm ent agencies and/or departme nts (unspecifi ed)	Sectoral actors (e.g. healthca re, defense, utilities, educatio n)
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 headquarte red in the jurisdiction							
Entities are subjected to disclosure or reporting	Applica ble to all.	Applicable to all.	Applicabl e to all.	Applicabl e to all.	Applicabl e to all.	Applicabl e to all.	The further regulatio n needed

requiremen ts							is pending.
20 Can antitio			ith the pelie	, to al in many	Jaton ( opt ou	t of the oblice	estion (o e
comply or expl		n compliance w	ith the policy	tooi is mand	iatory opt ou	t of the oblig	ation (e.g.
No							
∘ Yes							
30. Does the p	-			domestic ope	erations, or de	oes it also ap	ply to
o Operations v	within jurisc	liction only					
o Operations b	peyond the	jurisdiction					
<ul><li>Not applical</li></ul>	ble						
22.14/1							
32. What are t		ns for non-com	pliance? Sele	ect all that ap	piy and desc	cribe in the te	ext field.
☐ Monetary fir							
☐ Restriction of	on business	activities					
☐ Voiding or s	etting aside	e of contract					
☐ Exclusion from	om governr	nent contracts					
$\square$ Award of do	amages or a	compensation					
☐ Penalty for s	senior man	agers					
□ Criminal per	nalties						
☑ Not specifie	d						
□ Not applical	ble (e.g. in c	cases of volunt	ary tools)				
□ Other							

33. Relative to other compliance activities required of entities in this jurisdiction, is the cost of compliance:
o Below average
∘ Average
Above average
o 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.
o Below average
∘ Average
Above average
o Not applicable
• Unknown or prefer not to answer
37. Have the climate-specific provisions in this instrument ever been enforced?
o No (If relevant, explain)
Yes

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/
39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool?
<ul><li>No</li><li>Yes</li></ul>
41. Does the policy tool recommend or require periodic impact assessments?
No
o Recommended
o Required
43. Does the policy tool recommend or require periodic reviews?
No
o Recommended
o Required
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.)?
o 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.)?
o 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
Disclosure of Plans and Targets
132. Are targeted entities recommended or required to publicly disclose climate-related targets or transition plans?
No     No
∘ Recommended
o 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
<ul> <li>Recommended</li> </ul>
○ Required

$\circ \ Recommended$				
○ Required				
140. Which of the following	ina taraets or data rel	ated to targets does t	the policy tool recomme	end or
require entities have or d		=	the policy tool recomme	cria or
			No	
An absolute emissions	Recommended	Required	No ☑	
reduction target				
An intensity-based			<b>V</b>	
emissions reduction				
target				
A net zero target			<b>V</b>	
Interim targets (e.g. 2030, 2050)				
Targets covering non-			<b>V</b>	
carbon GHG emissions			_	
A Scope 3 emissions				
target A target derived using			<b></b> ✓	
a sectoral				
decarbonization				
approach				
A level of ambition for		<b>☑</b>		
emissions reductions				
(e.g. 80% reduction)	_			
A baseline year from which progress is				
measured				
A target timeframe			✓	
(e.g. by 2040)				
Targets for renewable			V	
energy procurement				
Targets for fossil fuel phase down/phase up			☑	
Separate targets for GHG offsets and/or			Ø	
removals				

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

achieving their targets?

No

Targets or goals related to climate adaptation			V
Targets or goals related to nature and biodiversity			V
Other targets related to sustainability			☑
150. What is the recomm	ended or required level of	ambition for GHG emission	ons reductions targets?
o Reduction between 1-2	5%		
• Reduction between 26-	-50%		
o Reduction between 51-	75%		
o Reduction between 75-	85%		
o Reduction between 85-	100%		
o Reduction of more than	100%		
o Other			
Transition Plans			
164. Does the policy tool	recommend or require tar	geted entities to have or c	levelop a transition plan?
∘ No			
o Recommended			
<ul><li>Required</li></ul>			

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.)			☑
Key Performance Indicators (KPIs) for monitoring transition plan implementation			
Updates to the transition plan			
Third-party verification and/or audited accuracy of the transition plan			
Identified methodology for scenario analysis			V
176. Does the policy tool monitoring, oversight, and	•	tities undertake any of the all that apply.	following with regard to
	Recommended	Required	No
Monitor progress in implementing their transition plan			☑ ☑
Develop financial plans for the implementation of their transition plan			<b>☑</b>
Integrate climate- related matters into their financial accounting			
Incorporate climate change considerations into their investment decision making and/or asset planning			
Incorporate climate change considerations			V

into their capital allocation and/or				
expenditure plans				
Any other mechanisms for enhancing the achievement of targets and/or the implementation of			☑	
transition plans				
Engagement, Lobbying, and Governance				
184. Does the policy tool	recommend or require tar	geted entities align any of	the following	
engagement and/or gove	rnance practices with thei	r targets and/or transition	n plans?	
	Recommended	Required	No	
Value chain engagement			V	
Investor engagement				
Consumer engagement				
Policy engagement and lobbying practices			V	
Corporate governance structure for transition and verification			V	
Climate-related financial incentives for employees and board members			☑	
• •	·	geted entities to disclose l		
diligence and/or stewards	ship to achieve their targe	ts and/or implement their	transition plans?	
No     Passammandad				
o Recommended				
o Required				

Standards, Frameworks,	, and Guidelines		
194. Does the policy tool frameworks, or guidelines	·	e reference to any of the fo	ollowing standards,
	Required	Referenced	Neither required nor referenced
IFRS S1			☑
IFRS S2			
Task Force on Climate-related Financial Disclosures (TCFD)			
CDP (formerly known as Climate Disclosure Project) Technical Note: Reporting on Climate Transition Plans			
International Integrated Reporting Framework			☑
Global Reporting Initiative (GRI)			<b>☑</b>
Sustainability Accounting Standards Board (SASB)			
Science Based Targets initiative (SBTi)			<b>☑</b>
Science Based Targets initiative (SBTi) Net Zero Standard			☑
European Sustainability Reporting Standards (ESRS)			
Other			

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: 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
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.
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)
7. Status of the policy tool
Approved, in force
o Approved, not yet in force
o Other (Please describe)

9. Year of (planned) entry into force or year of publication
<u>2024</u>
10. Does the policy tool have an end date?
No
∘ Yes
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.
13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not
applicable, leave blank.
o 1.
∘ 2.
∘ 3.
o 4.
o 5.

25.144.1		. 120	
25. Which entities are tar	geted through this polic	cy tool? Select all that apply	•
Note: With regard to	coctoral actors in caso	s where mandatory and vo	luntary obligations are
<del>-</del>		s where mandatory and vo for another), select "manda	
	•	ioi another), select manda	tory as there will be
further opportunity to cla	пту.		
	Mandatory	Voluntary	Not targeted
1. Publicly-traded			
entities			
2. Private companies			
3. Financial institutions			
4. Small and medium-			
sized enterprises			
5. State-owned			
companies			
6. Not-for-profit			
organizations			
7. Government			
agencies and/or			
departments			
(supranational)			
8. Government	✓		
agencies and/or departments (national)			
9. Government		<del> </del>	
agencies and/or			
departments (regional			
- e.g., state, province,			
region, metropolitan			
region)			
10. Government			
agencies and/or			
departments (local -			
e.g., county, district,			
municipality, city)			
11. Government	<b>V</b>		
agencies and/or			
departments (unspecified)			
12. Sectoral actors			
(e.g., healthcare,			
defense, utilities,			
education)			
13. Other			

27. Describe the threshold criteria mandatory.	to identify entities for whom or in	nstances in which compliance is
	Government agencies and/or	Government agencies and/or
Minimum number of employees (Enter min number of full-time employees - FTEs)	departments (national)	departments (unspecified)
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 complic comply or explain)?	ance with the policy tool is mando	atory opt out of the obligation (e.g.
No		
∘ Yes		
30. Does the policy tool exclusivel entities' operations beyond the jun		ations, or does it also apply to
<ul><li>Operations within jurisdiction o</li></ul>	nly	
o Operations beyond the jurisdicti	on	
o Not applicable		
32. What are the sanctions for no	n-compliance? Select all that app	ly 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:
o Below average
o Average
Above average
o 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.
o Below average
o Average
Above average
o 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     No
o Yes
41. Does the policy tool recommend or require periodic impact assessments?
No     No
○ Recommended
o Required
43. Does the policy tool recommend or require periodic reviews?
No     No
• Recommended
○ Required
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     No
o 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
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).
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     No

o Recommended
o Required
Targets
135. Does the policy tool recommend or require targeted entities to have or develop climate-related targets?
No
o Recommended
o Required
Transition Plans
164. Does the policy tool recommend or require targeted entities to have or develop a transition plan?
No
o Recommended
• Required
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	V							
implementing their								
transition plan								
Develop financial		☑						
plans for the								
implementation of								
their transition plan								
Integrate climate-								
related matters into								
their financial								
accounting								
Incorporate climate		☑						
change considerations								
into their investment								
decision making								
and/or asset planning								
Incorporate climate		☑						
change considerations								
into their capital								
allocation and/or								
expenditure plans								
Any other mechanisms			<b>V</b>					
for enhancing the								
achievement of								
targets and/or the								
implementation of								
transition plans								
177. Describe the obligati	on to monitor progress in	implementing transition p	olans, referencing the					
relevant section/subsection	on/paragraph of the policy	tool.						
Article 7 establishes that the National Land Transportation Agency will regulate the ordinance and								
<u>that such regulation will p</u>	<u>provide for mechanisms fo</u>	<u>or monitoring and measuri</u>	ng 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			$\blacksquare$
engagement			
Investor engagement			<b>\rightarrow</b>
Consumer			<b>V</b>
engagement			
Policy engagement			☑
and lobbying practices			

Corporate governance structure for transition			☑
and verification			
Climate-related			☑
financial incentives for			
employees and board			
members			
	·	geted entities to disclose lets and/or implement their	· · · · · · · · · · · · · · · · · · ·
<ul><li>No</li></ul>			
∘ Recommended			
Required			
o required			
Standards, Frameworks	, and Guidelines		
104 December malicuteral	roquiro the use of or mode	a rafaran aa ta any af tha fe	lloving standards
	-	e reference to any of the fo	bllowing standards,
frameworks, or guideline	s? Select all that apply.		
	Required	Referenced	Neither required nor
	ricquired	referenced	referenced
IFRS S1			<b>☑</b>
IFRS S2			
Task Force on			
Climate-related			
Financial Disclosures			
Financial Disclosures			
(TCFD)			
(TCFD) CDP (formerly known			<b>V</b>
(TCFD)  CDP (formerly known as Climate Disclosure			
(TCFD) CDP (formerly known			<b>V</b>
(TCFD)  CDP (formerly known as Climate Disclosure Project) Technical			☑
(TCFD)  CDP (formerly known as Climate Disclosure Project) Technical Note: Reporting on			✓
(TCFD)  CDP (formerly known as Climate Disclosure Project) Technical Note: Reporting on Climate Transition			✓
(TCFD)  CDP (formerly known as Climate Disclosure Project) Technical Note: Reporting on Climate Transition Plans			
(TCFD)  CDP (formerly known as Climate Disclosure Project) Technical Note: Reporting on Climate Transition Plans International			
(TCFD)  CDP (formerly known as Climate Disclosure Project) Technical Note: Reporting on Climate Transition Plans			

Global Reporting Initiative (GRI)

**√** 

Sustainability Accounting Standards Board (SASB)			V					
Science Based Targets initiative (SBTi)			abla					
Science Based Targets initiative (SBTi) Net Zero Standard			☑					
European Sustainability Reporting Standards (ESRS)			☑					
Other			<b>✓</b>					
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 Questior	ns: Public Procurement Qu	uestions						
with national and/or subn	·	uire the alignment of publ	ic procurement spending					
o No								
<ul><li>Allowed and/or recomm</li></ul>	nended							
o 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.

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			☑
A minimum number of climate-related criteria to be included in purchases/tenders			☑
A minimum value of procurement spend which must include climate-related criteria		V	
A maximum amount of greenhouse gas emissions associated with tenders/contracts (i.e. a carbon ceiling/envelope)			☑
Targets for the reduction of fossil fuel energy consumption associated with tenders/contracts			V
Targets for the procurement of products which have a third-party sustainability certification/ ecolabel/ voluntary sustainability standard			☑
Other (Please describe and reference the section/subsection/paragraph of the policy tool relevant to other climate-aligned procurement targets)			

Other Text:

Procu	rem	ent (	Cycle	2							

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/	Required	Not applicable
	recommended	'	
Procuring entities consider climate change mitigation and/or GHG emissions reductions goals when defining their procurement needs			
Procuring entities have a strategy, plan, or policy regarding the alignment of procurement practices with climate objectives			☑
Procuring entities set aside a portion of their procurement budgets for climate-aligned procurement			
Procuring entities include emissions from procurement in their carbon budget			
Procuring entities follow guidance on calculating procurement-related emissions			
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)								
Other allowances, recommendations or requirements related to climate change mitigation or GHG emissions at the procurement planning stage								
215. Describe and reference recommendations related planning stage.								
The ordinance established gross revenue from the co	s that new highway conce oncession to the developm	· -						
Life-cycle or Whole-life (	Costing							
217. Does the policy tool capture climate-related in environmental costs, end-	mpacts (e.g. energy or fue		<del>-</del>					
No								
o Allow and/or recommer	nd							
o 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			☑
Qualification or selection criteria related to climate change			
Including climate or environmental considerations when calculating value for money, including through the use of lifecycle or whole-life costing			
Technical specifications (e.g. setting minimum levels of energy efficiency or maximum product carbon emissions)			
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)			
Other procurement stage allowances, recommendations or requirements		☑	
Other Allowances, Recor	mmendations, or Require	ments	

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		
o 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/contrac	ts which include clir	nate-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 a	climate-related crite	ria in tenders	
·	☐ Market response to climate-related criteria (e.g. number of tenders rejected, average or owest/highest score awarded, feedback received)		
☐ Outcome of tenders in which costs, or other factors)	ch climate-related c	riteria are applied (e.g. im	npact on award decision,
☐ Audits of contractors' comp	pliance with climate	-related criteria during co	ontract performance
☐ Climate impact or outcome	es of tenders/contrac	cts	
□ Other			
258. Is it allowed, recommend	ded or required that	monitoring and reporting	g data be published?
No			
o Allowed and/or recommend	ded		
o Required			
Standards, Frameworks, and	d Guidelines		
262. Does the policy tool requ		ke reference to any of the	e following standards,
frameworks, or guidelines? So	elect all that apply.		
	Required	Referenced	Neither required nor referenced
1. Paris Agreement		V	
2. The jurisdiction's Nationally Determined Contribution (NDC)		V	

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

21. Other		
Additional Important Informat	ion	

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

s. Source material link(s): https://web.archive.org/web/20240825231554/https://www.planalto.gov.br/ccivil_03/_ato2015- https://web.archive.org/web/20240825231554/https://www.planalto.gov.br/ccivil_03/_ato2015-
. Which of the following governance domains does this policy tool relate to? Select all that apply.
Climate-related disclosure
I Transition planning
] Public procurement
5. Select the category which best describes the author/issuer of the policy tool.
Head of state and/or government
Independent regulatory or supervisory body
I Legislature
] Judiciary
Ministry/Department/Agency
Other (Please describe)
7. Status of the policy tool
Approved, in force
Approved, not yet in force
Other (Please describe)
Year of (planned) entry into force or year of publication
<u>2017</u>

10. Does the policy tool have an end date?
No
∘ Yes
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 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.
13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.
$\circ$ 1. The National Agency of Petroleum, Natural Gas and Biofuels
○ 2.
○ 3.
o 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			
2. Private companies			<b>V</b>
3. Financial institutions			✓
4. Small and medium-			<b>V</b>
sized enterprises			
5. State-owned			<b>V</b>
companies			
6. Not-for-profit			☑
organizations			
7. Government			✓
agencies and/or			
departments			
(supranational)			
8. Government			✓
agencies and/or			
departments (national)			
9. Government			☑
agencies and/or			
departments (regional			
- e.g., state, province,			
region, metropolitan			
region)			
10. Government			
agencies and/or			
departments (local -			
e.g., county, district,			
municipality, city)			
11. Government			
agencies and/or			
departments			
(unspecified)			
12. Sectoral actors	<b>V</b>		
(e.g., healthcare,			
defense, utilities,			
education)			
13. Other			

138

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

	Mandatory	Voluntary	Not applicable
All sectors			<b>V</b>
Agriculture, forestry, and fishing			V
Mining and quarrying			<b>7</b>
Manufacturing			<b>V</b>
Electricity, gas, steam, and air conditioning supply	Ø		
Water supply; sewerage; waste management and remediation activities			
Construction			<b>2</b>
Wholesale and retail trade: repair of motor vehicles and motorcycles			
Transportation and storage			☑
Accommodation and food service activities			
Information and communication			V
Financial and insurance activities			
Real estate activities			V
Professional, scientific and technical activities			V
Administrative and support service activities			V
Public administration and defense; compulsory social security			abla
Education			<b>V</b>
Human health and social work activities			✓
Arts, entertainment and recreation			V
Other service activities			<b>V</b>
Activities of households as employers; undifferentiated goods-and services- producing activities of			☑

households for own			
use			
Activities of			<b>V</b>
extraterritorial			
organizations and			
bodies			
27 Describe the threshold	d critoria to identify entitic	os for whom or instances i	n which compliance is
	a criteria to identity entitie	es for whom or instances i	n which compliance is
mandatory.			
		Sectoral actors (e.g. hea	lthcare, defense.
		utilities, education)	, , , , , , , , , , , , , , , , , , , ,
Minimum number of emp	oloyees (Enter min		
number of full-time emp			
Minimum revenue (Enter			
Minimum assets (Enter r			
Minimum contract value			
contract value)	•		
Entity is headquartered	in the jurisdiction		
Entities are subjected to disclosure or reporting		applicable to all fuel distributors	
requirements			
28. Can entities for whom	compliance with the poli	icy tool is mandatory opt c	out of the obligation (e.g.
comply or explain)?			
,			
No			
o Yes			
20 Doos the naligy tool or	والمراجع والمراجع والمراجع المراجع المراجع	o' domostic anarations or	daga it alaa aaalu ta
• •		s' domestic operations, or	does it also apply to
entities' operations beyon	id the jurisdiction?		
Operations within jurise	diction only		
o Operations beyond the	jurisdiction		
o Not applicable			
<ul> <li>Not applicable</li> </ul>			

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

☑ Monetary fine <u>Up to BRL 50,000,000</u>
☑ Restriction on business activities <u>suspension or stoppage of activity</u>
□ 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:
o Below average
o Average
Above average
o Not applicable
<ul><li>Unknown or prefer not to answer</li></ul>
35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority.
o Below average
o Average
Above average
o Not applicable
● Unknown or prefer not to answer

37. Have the climate-specific provisions in this instrument ever been enforced?
o No (If relevant, explain)
Yes
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).
$\underline{\text{https://web.archive.org/web/20240813003541/https:/www.stj.jus.br/sites/portalp/Paginas/Comunical}}$
cao/Noticias/08122020-Mantida-meta-anual-do-governo-federal-para-reducao-de-gases-do-
<u>efeito-estufa.aspx</u>
39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool?
o 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 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.

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

142

No
o Recommended
o Required
43. Does the policy tool recommend or require periodic reviews?
No
o Recommended
o Required
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     No
o 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.)?
o 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 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

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
o 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?
o No
∘ Recommended

137. Describe and referen	nce the section/subsection	/paragraph of the policy t	ool relevant to
monitoring progress in ac		, pa. ag. ap e. a. e peey e	
	•	ust be published on the int inistrative and financial re	
inspection firms.			
138. Does the policy tool achieving their targets?	recommend or require tar	geted entities to publicly r	eport on progress in
No			
o Recommended			
○ Required			
140 Which of the following	na taraets or data related	d to targets, does the polic	y tool recommend or
require entities have or de	= =	=	,
	Recommended	Required	No
An absolute emissions			<b>V</b>
reduction target An intensity-based			<b></b>
emissions reduction			
target			
A net zero target Interim targets (e.g.			<b>☑</b>
2030, 2050)			<b>☑</b>
Targets covering non-			<b>V</b>
carbon GHG emissions			_
A Scope 3 emissions target			☑
A target derived using		<b>V</b>	
a sectoral			
decarbonization			
approach			

Required

A level of ambition for emissions reductions			<b>☑</b>
(e.g. 80% reduction)			
A baseline year from which progress is			<b>☑</b>
measured			
A target timeframe			<b>√</b>
(e.g. by 2040)			
Targets for renewable			V
energy procurement			
Targets for fossil fuel phase down/phase up			✓
Separate targets for		<b>✓</b>	
GHG offsets and/or			
removals			
Targets or goals			<b>V</b>
related to climate			
adaptation			
Targets or goals			V
related to nature and			
biodiversity Other targets related			
to sustainability			<b>☑</b>
148. For which of the follo	owing sectors are entities	recommended or required	l to develop targets
derived using a sectoral d	lecarbonization approach	? Select all that apply.	
☐ Power generation			
□ Industry			
☐ Transport Services			
☐ Services/Commercial b	uildings		
☑ Other <u>fuel distribution</u>			
☐ None specified			
149. Does the policy tool approach be validated by	•	gets derived using a secto	oral decarbonization
∘ No			
o 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?
o No
o 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) <u>Article 5, I, defines the Biofuel</u> <u>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.</u>
Transition Plans
164. Does the policy tool recommend or require targeted entities to have or develop a transition plan?
No     No
○ Recommended
o Required

176. Does the policy tool	recommend or require	e entities undertake an	v of the following with	reaard to
monitoring, oversight, and	•		,	9
	Recommended	Required	No	
Monitor progress in implementing their transition plan				
Develop financial plans for the implementation of their transition plan			V	
Integrate climate- related matters into their financial accounting				
Incorporate climate change considerations into their investment decision making and/or asset planning			<b>☑</b>	
Incorporate climate change considerations into their capital allocation and/or expenditure plans			☑	
Any other mechanisms for enhancing the achievement of targets and/or the implementation of transition plans			☑	

Monitoring, Oversight, and Implementation

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.

	1.0		
Engagement, Lobbying,	and Governance		
184. Does the policy tool	•	•	-
engagement and/or gove	rnance practices with	their targets and/or tr	ransition plans?
	Recommended	Required	No
Value chain			Ø
engagement			
Investor engagement			<b></b>
Consumer			<b></b>
engagement			
Policy engagement			☑
and lobbying practices			
Corporate governance			☑
structure for transition			
and verification	<u> </u>		
Climate-related			
financial incentives for			
employees and board members			
members			
105 Dagatha naliantaal			
	· ·	=	lisclose how they have used due
diligence and/or steward	ship to achieve their to	argets and/or impleme	ent their transition plans?
No			
0 110			
<ul><li>Recommended</li></ul>			
Paguirad			
<ul><li>Required</li></ul>			
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			☑
IFRS S2			<b>Z</b>
Task Force on Climate-related Financial Disclosures (TCFD)			
CDP (formerly known as Climate Disclosure Project) Technical Note: Reporting on Climate Transition Plans			
International Integrated Reporting Framework			V
Global Reporting Initiative (GRI)			Ø
Sustainability Accounting Standards Board (SASB)			$\square$
Science Based Targets initiative (SBTi)			Ø
Science Based Targets initiative (SBTi) Net Zero Standard			Ø
European Sustainability Reporting Standards (ESRS)			
Other			
Additional Important Inf	ormation		

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
4. Which of the following governance domains does this policy tool relate to? Select all that apply.
☐ Climate-related disclosure
☐ Transition planning
☑ Public procurement
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)
7. Status of the policy tool
• Approved, in force
o Approved, not yet in force
o Other (Please describe)
9. Year of (planned) entry into force or year of publication
<u>2021</u>

10. Does the policy tool he	ave an end date?		
No			
∘ Yes			
12. Briefly describe the po	olicy tool's goal and/or pur	pose:	
For example: The policy recommendations of the absence of such disclosur			
The Law establishes generated Public Administrations of one of the criteria for apparents, supplies and services	the Union, States, Federa lying variable remuneration	l District and Municipalitie	es. Sustainability can be
13. Name the authority(ie applicable, leave blank.	s) responsible for oversee	ing implementation and/o	or enforcement. If not
○ 1.			
∘ 2.			
∘ 3.			
o 4.			
o 5.			
25. Which entities are tar	geted through this policy	tool? Select all that apply.	
Note: With regard to mixed (e.g., mandatory fo further opportunity to clar	•	•	, ,
	Mandatory	Voluntary	Not targeted
Publicly-traded     entities			<b>☑</b>

2. Private companies

**√** 

4. Small and medium-sized enterprises  5. State-owned companies  6. Not-for-profit corganizations  7. Government agencies and/or departments (supranational)  8. Government agencies and/or departments (national)  9. Government agencies and/or departments (regional e.g., state, province, region, metropolitan region)  10. Government agencies and/or departments (local e.g., county, district, municipality, city)  11. Government agencies and/or departments (local fegarements (local fegarem	3. Financial institutions			V
5. State-owned companies  6. Not-for-profit corganizations  7. Government agencies and/or departments (supranotional)  8. Government agencies and/or departments (national)  9. Government agencies and/or departments (regional e.g., state, province, region, metropolitan region)  10. Government agencies and/or departments (local e.g., county, district, municipality, city)  11. Government agencies and/or departments (local departme				<b>2</b>
companies  6. Not-for-profit				
6. Not-for-profit organizations 7. Government agencies and/or departments (supranational) 8. Government agencies and/or departments (national) 9. Government agencies and/or departments (regional - e.g., state, province, region, metropolitan region) 10. Government agencies and/or departments (local - e.g., county, district, municipality, city) 11. Government agencies and/or departments (local - e.g., county, district, municipality, city)  11. Government agencies and/or departments (local - e.g., county, district, municipality, city)				☑
organizations 7. Government agencies and/or departments (supranational) 8. Government agencies and/or departments (national) 9. Government agencies and/or departments (regional - e.g., state, province, region, metropolitan region) 10. Government agencies and/or departments (local - e.g., county, district, municipality, city)  11. Government agencies and/or departments (local - e.g., county, district, municipality, city)  11. Government agencies and/or departments (unspecified)				
7. Government agencies and/or departments (supranational)  8. Government agencies and/or departments (national)  9. Government agencies and/or departments (regional - e.g., state, province, region, metropolitan region)  10. Government agencies and/or departments (local - e.g., county, district, municipality, city)  11. Government agencies and/or departments (local - e.g., county, district, municipality, city)	· · · · · · · · · · · · · · · · · · ·			<b>2</b>
agencies and/or departments (supranational)  8. Government				
departments (supranational)  8. Government agencies and/or departments (national)  9. Government agencies and/or departments (regional - e.g., state, province, region, metropolitan region)  10. Government agencies and/or departments (local - e.g., county, district, municipality, city)  11. Government agencies and/or departments (local - e.g., county, district, municipality, city)				
(supranational)	-			
8. Government agencies and/or departments (national)  9. Government agencies and/or departments (regional - e.g., state, province, region, metropolitan region)  10. Government agencies and/or departments (local - e.g., county, district, municipality, city)  11. Government agencies and/or departments (local - local state) agencies and/or departments (local state) a	· ·			
agencies and/or departments (national)  9. Government agencies and/or departments (regional - e.g., state, province, region, metropolitan region)  10. Government agencies and/or departments (local - e.g., county, district, municipality, city)  11. Government agencies and/or departments (unspecified)				
departments (national)  9. Government agencies and/or departments (regional - e.g., state, province, region, metropolitan region)  10. Government agencies and/or departments (local - e.g., county, district, municipality, city)  11. Government agencies and/or departments (unspecified)		₩	⊔	
9. Government agencies and/or departments (regional - e.g., state, province, region, metropolitan region)  10. Government agencies and/or departments (local - e.g., county, district, municipality, city)  11. Government agencies and/or departments (unspecified)	-			
agencies and/or departments (regional - e.g., state, province, region, metropolitan region)  10. Government		[7]	П	П
departments (regional - e.g., state, province, region, metropolitan region)  10. Government agencies and/or departments (local - e.g., county, district, municipality, city)  11. Government agencies and/or departments (unspecified)				
- e.g., state, province, region, metropolitan region)  10. Government	1 -			
region, metropolitan region)  10. Government				
region)  10. Government				
10. Government				
departments (local - e.g., county, district, municipality, city)  11. Government agencies and/or departments (unspecified)		<b>V</b>		
e.g., county, district, municipality, city)  11. Government	agencies and/or			
municipality, city)  11. Government	departments (local -			
11. Government	e.g., county, district,			
agencies and/or departments (unspecified)	municipality, city)			
departments (unspecified)		<b>V</b>		
(unspecified)	1 -			
	· ·			
11) Contaral actors				
	12. Sectoral actors			$\blacksquare$
(e.g., healthcare,	1			
defense, utilities,				
education)	·			
13. Other □ □ □	13. Other	Ш	Ш	Ш

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

Government	Government	Government	Government
agencies and/or	agencies and/or	agencies and/or	agencies and/or
departments	departments	departments	departments
(national)	(regional - e.g.	(local - e.g.	(unspecified)
	state, province,	county, district,	
	region,	municipality, city)	
	metropolitan		
	region)		

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	A secoli e ede la dia cell	A	A	A secoli e ede la dia cell
Entities are	Applicable to all	Applicable to all	Applicable to all	Applicable to all
subjected to disclosure or				
reporting requirements				
requirements				
28. Can entities for vocomply or explain)?   No	whom compliance w	ith the policy tool is r	mandatory opt out of	the obligation (e.g.
∘ Yes				
30. Does the policy t		y to entities' domestion?	c operations, or does	it also apply to
o Operations within	jurisdiction only			
Operations beyon	d the jurisdiction			
o 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.

● Unknown or prefer not to answer
o Not applicable
Above average
o Average
o Below average
33. Relative to other compliance activities required of entities in this jurisdiction, is the cost of compliance:
☑ Other ☐ Warning; prohibition on bidding and contracting; and declaration of unsuitability to bid or contract
□ Not applicable (e.g. in cases of voluntary tools)
□ Not specified
☐ Criminal penalties
☐ Penalty for senior managers
☐ Award of damages or compensation
☐ Exclusion from government contracts
☐ Voiding or setting aside of contract
☐ Restriction on business activities
☑ 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.
32. What are the sanctions for non-compliance? Select all that apply and describe in the text field.
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.
Article 1, paragraph 2 establishes that contracts carried out within the scope of public offices based

35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority.
o Below average
∘ Average
o Above average
o Not applicable
• Unknown or prefer not to answer
37. Have the climate-specific provisions in this instrument ever been enforced?
<ul><li>No (If relevant, explain)</li></ul>
∘ Yes
39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool?
No     No
∘ Yes
41. Does the policy tool recommend or require periodic impact assessments?
No     No
○ Recommended
o Required
43. Does the policy tool recommend or require periodic reviews?
No
o Recommended
o Required

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
o 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     No
∘ Yes
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.
<u>None</u>

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     No
o Allowed and/or recommended
o 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			V
A minimum number of climate-related criteria to be included in purchases/tenders			☑
A minimum value of procurement spend which must include climate-related criteria			V
A maximum amount of greenhouse gas emissions associated with tenders/contracts (i.e. a carbon ceiling/envelope)			
Targets for the reduction of fossil fuel energy consumption associated with tenders/contracts			$\square$
Targets for the procurement of products which have a third-party sustainability certification/ ecolabel/ voluntary sustainability standard			☑
Other (Please describe and reference the	V		

section/subsection/paragraph of the policy tool relevant to			
other climate-aligned			
procurement targets)			
Other Text: It is possible to estab	<u>olish variable remuneratio</u>	<u>n linked to the contrac</u>	tor's performance
based on goals, quality standard	ds, and environmental sus	tainability criteria	
		•	
Procurement Cycle			
. roda. ement eye.e			

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			✓
Procuring entities have a strategy, plan, or policy regarding the alignment of procurement practices with climate objectives			
Procuring entities set aside a portion of their procurement budgets for climate-aligned procurement			
Procuring entities include emissions from procurement in their carbon budget			
Procuring entities follow guidance on calculating procurement-related emissions			
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)										
Other allowances,			<b>☑</b>							
recommendations or										
requirements related										
to climate change										
mitigation or GHG										
emissions at the										
procurement planning										
stage										
Life-cycle or Whole-life (	Costing									
217. Does the policy tool	recommend or require the	use of life-cycle costing o	or whole-life costing to							
	npacts (e.g. energy or fuel		<del>-</del>							
environmental costs, end-		consumption, monetized								
environmental costs, ena-	-or-line costs, etc):									
No										
A.II. 1./	1									
<ul> <li>Allow and/or recommer</li> </ul>	10									
o Require										
Tendering or Solicitation	Stage									
222 Does the policy tool	make allowances, recomn	nendations or set requirer	nents at the tendering or							
		rendutions of set requirer	nents at the tendening of							
solicitation stage? Select	ин ини ирріу.									
	Allowed/recommended	Required	Not applicable							
Exclusion or			✓							
debarment grounds										
J	<u>.                                    </u>	i e e e e e e e e e e e e e e e e e e e	<u> </u>							

☑	
	☑

included to monitor and report	on emissions or other n	netrics)?									
No											
○ Allowed and/or recommended											
Allowed drid/or recommended											
Required											
Monitoring and Reporting											
252. Does the policy tool includ report upon climate-aligned pro		endations or requiremen	ts to monitor and/or								
No											
o Allowed and/or recommended	d										
Required											
·											
Standards, Frameworks, and (	Guidelines										
262. Does the policy tool require frameworks, or guidelines? Sele		ference to any of the foll	owing standards,								
rumeworks, or guidelines: Sele											
	Required	Referenced	Neither required nor referenced								
1. Paris Agreement			✓ ✓								
2. The jurisdiction's			<b>☑</b>								
Nationally Determined			_								
Contribution (NDC)											
3. IFRS S1			☑								
4. IFRS S2			<b>V</b>								
5. Task Force on Climate-			V								
related Financial Disclosures (TCFD)											

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

6. GHG Protocol Corporate			<b>I</b>
Accounting and Reporting			
Standard			
7. GHG Protocol Corporate			<b>V</b>
Value Chain (Scope 3)			
Accounting and Reporting			
Standard			
8. CDP (formerly known as			✓
Climate Disclosure Project)			
reporting framework			
9. Science Based Targets			✓
initiative (SBTi)			
10. Science Based Targets			<b>V</b>
initiative (SBTi) Net Zero			
Standard			
11. United Nations			<b>☑</b>
Sustainable Development			
Goals (SDGs)			
12. ISO 20400 Sustainable			<b>7</b>
Procurement			
13. EU Green Public			<b>7</b>
Procurement criteria and			
guidance			
14. UNEP Sustainable Public			<b>V</b>
Procurement			
Implementation Guidelines			
15. OECD MAPS -			<b>2</b>
Supplementary Module on			
Sustainable Public			
Procurement			
16. Asian Development			<b>V</b>
Bank Guidelines for			
Sustainable Procurement			
17. African Development			<b>V</b>
Bank Sustainable Public			
Procurement Guidance Note			
18. Inter-American			<b>V</b>
Development Bank Green			
Procurement Guidelines			
19. EDBR Project			<b></b> ✓
Requirements/Environmental	_		_
and Social Action Plan			
20. World Bank			<b>V</b>
Environmental and Social	_		_
Framework			
21. Other			
	<u>. –                                     </u>	<u>. –                                     </u>	

\_\_\_\_\_

## 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.

## 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
4. Which of the following governance domains does this policy tool relate to? Select all that apply.
□ Climate-related disclosure
□ Transition planning
☑ Public procurement
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
☐ Ministry/Department/Agency
□ Other (Please describe)
7. Status of the policy tool
Approved, in force
o Approved, not yet in force
o Other (Please describe)
9. Year of (planned) entry into force or year of publication
<u>2016</u>

10. Does the policy tool have an end date?
No     No
∘ Yes
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.
13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.
∘ <b>1</b> .
o 2.
○ 3.
o 4.
o 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			<b>✓</b>
entities			
2. Private companies			<b>V</b>
3. Financial institutions			✓
4. Small and medium-			<b>☑</b>
sized enterprises			
5. State-owned	☑		
companies			
6. Not-for-profit			<b>I</b>
organizations			
7. Government			<b></b>
agencies and/or			
departments			
(supranational)			
8. Government			
agencies and/or			
departments (national)			
9. Government			
agencies and/or			
departments (regional			
- e.g., state, province,			
region, metropolitan			
region)			
10. Government			
agencies and/or departments (local -			
e.g., county, district,			
municipality, city)			
11. Government			<u> </u>
agencies and/or			N.
departments			
(unspecified)			
12. Sectoral actors			<b>✓</b>
(e.g., healthcare,			
defense, utilities,			
education)			
13. Other			
13. Other			

167

27	. Describe the	threshold	criteria to	identify	entities	for wh	om or	instances	in which	complian	ce is
mo	andatory.										

	State-owned companies
Minimum number of employees (Enter min	
number of full-time employees - FTEs)	BRL 90,000,000
Minimum revenue (Enter minimum revenue)  Minimum assets (Enter minimum assets)	BRL 90,000,000
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 policomply or explain)?	cy tool is mandatory opt out of the obligation (e.g.
No	
∘ Yes	
<ul> <li>30. Does the policy tool exclusively apply to entities entities' operations beyond the jurisdiction?</li> <li>Operations within jurisdiction only</li> <li>Operations beyond the jurisdiction</li> <li>Not applicable</li> </ul>	s' domestic operations, or does it also apply to
32. What are the sanctions for non-compliance? Se	elect 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:
o Below average
∘ Average
Above average
o 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.
o Below average
∘ Average
Above average
o 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     No
∘ Yes
41. Does the policy tool recommend or require periodic impact assessments?
No
o Recommended
o Required
43. Does the policy tool recommend or require periodic reviews?
No
o Recommended
o Required
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     No
∘ Yes

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					
Domain-Specific Questions: Pub	lic Procurement Questions	5			
200. Does the policy tool allow, with national and/or subnational	·	alignment of public p	rocurement spending		
No					
<ul> <li>Allowed and/or recommended</li> </ul>					
∘ Required					
202. Does the policy tool set targ	gets 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					
A minimum number of climate-related criteria to be included in purchases/tenders			V		
A minimum value of procurement spend which					

must include climate-rela	ated						
criteria							
A maximum amount of							
greenhouse gas emission	ns						
associated with							
tenders/contracts (i.e. a							
carbon ceiling/envelope)							
Targets for the reduction	of 🗆						
fossil fuel energy							
consumption associated	with						
tenders/contracts							
Targets for the procurem			☑				
of products which have o							
third-party sustainability	'						
certification/ ecolabel/							
voluntary sustainability							
standard							
Other (Please describe a	nd 🔽						
reference the							
section/subsection/parag	graph						
of the policy tool relevan	t to						
other climate-aligned							
procurement targets)							
Other Text: It is possible to	Other Text: It is possible to establish variable remuneration linked to the contractor's performance.						
based on goals, quality standards, and environmental sustainability criteria.							
Due come manual Corela							
Procurement Cycle							
204 December of Brooks of							
204. Does the policy tool r			•				
climate change mitigation	at the procurement plai	nning stage? Select al	ll that apply.				
	Λ II I /	Deswined	Natawaliawala				
	Allowed/	Required	Not applicable				
D	recommended	<u> </u>					
Procuring entities		Required	Not applicable  ☑				
consider climate	recommended	<u> </u>					
consider climate change mitigation	recommended	<u> </u>					
consider climate change mitigation and/or GHG emissions	recommended	<u> </u>					
consider climate change mitigation and/or GHG emissions reductions goals when	recommended	<u> </u>					
consider climate change mitigation and/or GHG emissions reductions goals when defining their	recommended	<u> </u>					
consider climate change mitigation and/or GHG emissions reductions goals when defining their procurement needs	recommended	<u> </u>					
consider climate change mitigation and/or GHG emissions reductions goals when defining their procurement needs Procuring entities have	recommended	<u> </u>					
consider climate change mitigation and/or GHG emissions reductions goals when defining their procurement needs	recommended		☑				

alignment of procurement practices with climate objectives		
Procuring entities set aside a portion of their procurement budgets for climate-aligned procurement		☑
Procuring entities include emissions from procurement in their carbon budget		abla
Procuring entities follow guidance on calculating procurement-related emissions		
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)		
Other allowances, recommendations or requirements related to climate change mitigation or GHG emissions at the procurement planning stage		
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

o Allow and/or recommer	nd		
∘ Require			
Tendering or Solicitation	: Stage		
222. Does the policy tool	make allowances, recomn	nendations or set requirer	nents at the tendering or
solicitation stage? Select			_
F 1 :	Allowed/recommended	Required	Not applicable
Exclusion or			
debarment grounds			
based on compliance with climate			
obligations Ouglification or			
Qualification or selection criteria			
related to climate			
change Including climate or			
environmental			
considerations when			
calculating value for			
money, including			
through the use of life-			
cycle or whole-life			
costing			
Technical			<b>V</b>
specifications (e.g.			
setting minimum levels			
of energy efficiency or			
maximum product			
carbon emissions)			
Contract award	<b></b>		
criteria or value for			
money evaluation			
frameworks (e.g.			
minimum			
scores/performance			
levels under climate-			
related criteria,			
preferences for climate			

or sustainable			
products) Other procurement			<b>☑</b>
stage allowances,			ت ا
recommendations or			
requirements			
Life-cycle costing or who	le-life costing		
241. Describe how life-cy	cle costing or whole-life c	osting is allowed, recomm	nended. or required at the
tendering or solicitation st	<del>-</del>	=	·
tool.	J		5 / 17 5
As mentioned above, ther	re is no climato-chocific as	ovisions Even though the	a nolicy tool proceribes
that environmental costs	·		
advantages within public			
			<del></del>
Contract Award Criteria			
Contract Performance			
249. Does the policy tool			
performance stage (e.g. o			ditions which must be
included to monitor and re	eport on emissions or othe	er metrics)?	
No			
o Allowed and/or recomm	ended		
o Required			
Monitoring and Reportin	g		

252. Does the policy tool include allowances, recommendations or requirements to monitor and/or report upon climate-aligned procurement?
No     No
o Allowed and/or recommended
o 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			<b>V</b>
2. The jurisdiction's			
Nationally Determined			
Contribution (NDC)			
3. IFRS S1			<b>V</b>
4. IFRS S2			✓
5. Task Force on Climate-			<b>V</b>
related Financial Disclosures			
(TCFD)			
6. GHG Protocol Corporate			$\square$
Accounting and Reporting			
Standard			
7. GHG Protocol Corporate			$\square$
Value Chain (Scope 3)			
Accounting and Reporting			
Standard			
8. CDP (formerly known as			☑
Climate Disclosure Project)			
reporting framework			
9. Science Based Targets			☑
initiative (SBTi)			
10. Science Based Targets			✓
initiative (SBTi) Net Zero			
Standard			

11. United Nations			<b>✓</b>	
Sustainable Development				
Goals (SDGs)				
12. ISO 20400 Sustainable			$\checkmark$	
Procurement				
13. EU Green Public				
Procurement criteria and				
guidance				
14. UNEP Sustainable Public				
Procurement				
Implementation Guidelines				
15. OECD MAPS -			<b>7</b>	
Supplementary Module on				
Sustainable Public				
Procurement				
16. Asian Development			$\checkmark$	
Bank Guidelines for				
Sustainable Procurement				
17. African Development			<b>✓</b>	
Bank Sustainable Public				
Procurement Guidance Note				
18. Inter-American			<b>7</b>	
Development Bank Green				
Procurement Guidelines				
19. EDBR Project			<b>✓</b>	
Requirements/Environmental				
and Social Action Plan				
20. World Bank			<b>✓</b>	
Environmental and Social				
Framework				
21. Other				
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.