ICE SFDR Principle Adverse Impact (PAI) Solution

Sustainable Finance Disclosure Regulation (SFDR) introduces various disclosure-related requirements for financial market participants and financial advisors at entity, service and product level. The aim of the regulation is to provide more standardization and transparency on sustainability products within the financial markets, preventing greenwashing and ensuring comparability.

SFDR defines three categories of product which their manufacturers must report to investors on:

1. Financial products which have “sustainable investment” as their objective (Article 9)
2. Financial products which promote, amongst others, ESG characteristics of the investment (Article 8)
3. All other financial products — products that do not purport to promote any kind of ESG objective

For the first two categories, Financial Market Participants (FMPs) and financial advisers need to disclose pre-contractual and periodic reports regarding how adverse impacts have been considered, use of suitable benchmarks and how objectives are measured. For larger FMPs, they must also publish Principal Adverse Impact Disclosures across their investment portfolios or funds.

ICE solution

To aid in compliance, ICE offers an SFDR Principle Adverse Impact (PAI) solution, which offers continuously updated input values for several SFDR indicators. The dataset is taken from our wider ICE ESG Reference Data service that captures over 500 company-reported data points from publicly-available sources and reports as well as ESG risk analysis based on data from our data collaborator, ESG data science firm RepRisk. It also leverages our extensive global securities database and established corporate hierarchy information, so that ICE’s SFDR solution allows clients to link equity and fixed income security holdings to the closest disclosing corporate entity. Flexible delivery is available including an easy to use, customizable user interface (ICE Data Viewer for ESG) and XML file delivery.

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*Based on coverage as of Q1 2022
Corporate ESG indicators
To address the 14 mandatory and 33 optional corporate entity indicators, ICE has mapped data points from our core ESG solution to produce a dedicated file aligned to the PAI disclosure report format.

Sovereign ESG indicators
The ICE sovereign ESG service covers the 10 indicators required for PAI reporting. Coverage for the indicators is across 194 countries and is taken from established sources, then aggregated and normalized with the goal of maximizing coverage and obtaining the latest possible data.

Data derivation
The requirements defined under the draft Regulatory Technical Standards (RTS) state a specific presentation of some of the indicators which may require calculation on top of the originating company disclosure. ICE will perform these for each company in the service.

Sector averages
To assist clients with achieving the best possible coverage in their disclosures, ICE is leveraging the cross-sector data forming our core Entity ESG Reference Data solution and applying an averaging formula to produce values which can be inserted in lieu of those which have not been disclosed by investee companies. ICE provides identifying metadata against these data points to retain full data lineage of disclosure inputs.

Data partner:
RepRisk is an ESG data science firm leveraging the combination of AI and machine learning with human intelligence to systematically analyze public information in 23 languages and identify material ESG risks. With daily data updates across 100+ ESG risk factors, RepRisk provides consistent, timely, and actionable data for risk management and ESG integration across a company’s operations, business relationships, and investments. www.reprisk.com.
ICE SFDR PAI indicator coverage

- Mandatory environmental indicators
  - Hazardous waste ratio
  - Emissions to water
  - Energy self-consumption intensity
  - Non-renewable energy consumption
  - Forestry fuel sector exposure
  - GHG intensity
  - Carbon footprint
  - GHG emissions

- Mandatory social indicators
  - Human rights abuses
  - Anti-corruption policies

- Optional environmental indicators
  - Deforestation policies
  - Protected species impact
  - Non-recycled waste ratio
  - Sustainable ocean policy
  - Chemical production exposure
  - High water stress area exposure
  - Water management
  - Water usage
  - Carbon emission reduction
  - Ozone depleting emissions
  - Emissions of all pollutants

- Optional social indicators
  - Supplier code of conduct
  - Whistleblower protection
  - Incidents of discrimination
  - CEO pay ratio
  - Violations of UNGC principles

- Securities data
  - Green bonds

Why ICE for ESG?

- **High-quality data**
  A broad range of high-quality ESG data solutions, including indices, reference data and climate tools.

- **Expertise**
  Nearly 20 years in creating sustainable products and solutions provides us with diverse insights on ESG and sustainable development.

- **Technology**
  Leading exchange platforms and technology provide access to sustainable markets and powerful ESG data.

Learn more
ice.com/regulation/esg-support

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