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INVESTOR BRIEFING

13 April 2022

Mitsubishi Corporation (JP: 8058)

Shareholder proposals to align with net zero by 2050 commitment

Executive summary

Despite its net zero emissions by 2050 commitment, Mitsubishi Corporation (Mitsubishi) is undermining this goal with its pursuit of new gas production and infrastructure projects.

The International Energy Agency (IEA) finds in its <u>Net Zero Emissions by 2050 Scenario</u> (NZE2050) there is no room for new oil and gas fields, significant stranded asset risk for liquefied natural gas (LNG) facilities, and that gas use for power must rapidly decline. Yet Mitsubishi is pursuing new projects to significantly expand its LNG and gas power operations, and has no policies to rule out or in any way restrict their development, effectively **betting shareholder capital against the net zero by 2050 energy transition it claims to support**.

The company has also set a mid-term emission reduction target that fails to manage the significant exposure to transition risk represented by its Scope 3 emissions. Without effective and comprehensive short and medium term emission targets covering Scope 1, 2 and 3 emissions, and a capital allocation framework aligned with the company's own net zero by 2050 commitment, Mitsubishi is at significant risk of contradicting the goal and the timeline of net zero emissions by 2050, which it claims to support.

Extensive engagement with Mitsubishi by Market Forces, Kiko Network, and Friends of the Earth Japan (among others) has not led to adequate changes from the company. As a result, shareholder proposals (see full details on pages 8 and 9) making the following requests of Mitsubishi have been filed:

- 1. Adopt and disclose short-term and mid-term greenhouse gas (GHG) emission reduction targets aligned with the climate goals of the Paris Agreement.
- 2. Disclose an assessment of how a net zero by 2050 pathway would affect the assumptions, costs, estimates, and valuations underlying capital expenditure investments in the development of new upstream, midstream and downstream oil and gas assets.

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LNG expansion plans undermine climate commitments

Despite the company's net zero by 2050 <u>commitment</u>, the table below shows Mitsubishi's targets and plans are out of line with the Paris Agreement and NZE2050. NZE2050 should be regarded as bullish on future fossil fuel demand as it aims for only a 50% chance of limiting global warming to 1.5°C and relies heavily on unproven negative emissions technology.

NZE2050 conclusions	Mitsubishi policies	Mitsubishi practice
"Beyond projects already committed as of 2021, there are no new oil and gas fields approved for development in our pathway".	No policy to rule out or in any way restrict development of new oil and gas fields.	Along with project partners, Mitsubishi plans to develop the new Udabari gas field and raise output at the Vorwata gas field to expand the <u>Tangguh LNG project</u> in Indonesia.
"Also not needed are many of the liquefied natural gas (LNG) liquefaction facilities currently under construction or at the planning stage".	No policy to rule out or in any way restrict development of new LNG projects.	 Plans to increase LNG liquefaction capacity (on an equity share basis) by roughly 20% from 12mtpa currently to 14.6mtpa by the mid 2020s. Plans to build an LNG terminal in Port Qasim, Pakistan. Local NGOs have raised concerns that the project will disrupt fishing communities and harm vital mangrove forests. Recently received a loan to develop LNG Canada, a major polluting LNG terminal, objected to by the First Nations people whose traditional lands this project would impact.
Absolute emissions from oil and gas fall by 23% from 2020-2030 (oil 27%, gas 17%).	Scope 3 emissions target does not apply to use of sold products, therefore	Currently bidding on or sponsoring two import terminals and three proposed LNG to power projects in <u>Bangladesh and Vietnam</u> . ¹ With an expected life of 25 years, these

NZE2050 conclusions compared with Mitsubishi policies and practice

¹ According to financial subscription sources and news reports, in Bangladesh, Matarbari Summit LNG power plant, Matarbari Summit LNG terminal and in Vietnam, Bac Lieu power plant and Long Son power plant

does nothing to restrict emissions from the end use of its oil and gas products.	projects will be emitting carbon and processing carbon-intensive LNG to 2050 and beyond.
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Analysis of some of Mitsubishi's LNG investments demonstrate the projects risk failing to recoup investment costs under the NZE2050 scenario. Under NZE2050, lower-than-anticipated LNG demand would hurt the profitability of Mitsubishi's LNG investments.

Breakeven prices for LNG projects in the NZE2050 vs planned Mitsubishi LNG projects

Gas demand in the NZE2050	LNG Canada	Tangguh train 3 (Indonesia)
LNG projects with a breakeven price in excess of \$5/mmbtu would be at risk of failing to recoup their investment costs.	Recent analysis by IEEFA suggests LNG Canada, under ideal circumstances, would deliver LNG to Asian markets at a breakeven cost of \$7-8/mmbtu.	Research by the Oxford Institute for Energy Studies placed the breakeven cost of Tangguh train 3 in Indonesia at around \$7/mmbtu.

Analyses pointing to the stranded asset risk of additional LNG capacity in Asia are mounting. Emerging Asia markets cannot be expected to replace the demand falls expected under any credible Paris-aligned scenario. Even before taking climate policy into account, <u>IEEFA analysis</u> examining the proposed pipeline of LNG-to-power projects in Vietnam, Thailand, the Philippines, Cambodia, Myanmar, Pakistan and Bangladesh has found 62% of proposed LNG import terminal capacity and 61% of proposed gas-fired power capacity is unlikely to be built due to unfavourable project and country market fundamentals, and financial market constraints.

<u>Analysis from Oil Change International</u> shows switching from coal to gas for power generation will not cut carbon emissions enough to meet the Paris climate goals. <u>Imported LNG can be as polluting as coal</u> when aggregating emissions from extracting, processing, storing, and transporting the gas, as well as burning it.

Mitsubishi is no stranger to LNG investments going sour. The company holds a <u>7.2% stake</u> in the Woodside-led Browse project off north-west Australia, having <u>bought this stake for US\$1bn in 2012</u>. This mammoth US\$30bn project was first shelved in 2013, prompting a US\$100m redesign effort <u>only to be shelved again in 2016</u>. At the time, Mitsubishi took a 60bn yen pre-tax impairment on the project, <u>cutting its value on the balance sheet in half</u>.

To reduce its exposure to stranded asset risk, Mitsubishi must evaluate its material capital expenditures in the energy sector for consistency with a credible net zero emissions by 2050 scenario. The company should disclose the assumptions (long-term commodity demand, long-term commodity and carbon prices, asset lives, future asset retirement obligations, capital expenditures and impairments) underpinning material capital expenditures so investors can be confident Mitsubishi is adequately considering and managing financial risks climate change poses to its business.

No disclosed pathway to meet climate commitments

An update on <u>the Task Force on Climate-related Financial Disclosures (TCFD) guidance</u> published in 2021 also reflects such investor concerns and recommends companies set and disclose clear metrics and targets, and sound transition plans, to support and guide their management of climate change transition risks. Although Mitsubishi has <u>committed</u> to reach net zero emissions by 2050, it lacks disclosure of key elements required to show it has a viable pathway to meet this goal. Specifically, Mitsubishi:

- Has set a mid-term target (to <u>halve</u> emissions by 2030) that only includes Scope 3 "investment emissions", excluding Mitsubishi's most material Scope 3 emissions, which are those from the end use of its fossil fuel commodities
- Has set no other short or mid-term emission targets
- Fails to disclose its assumptions around unproven technologies such as plants co-firing ammonia and CCUS
- Discloses scenario analysis that only includes high level descriptions of future trends and lacks robust quantitative measures required to evaluate transition risk.

Lack of short and mid-term targets

Mitsubishi has not set any short-term emission reduction targets (by 2025), and its <u>mid-term target</u> (2030) is entirely inadequate to ensure alignment with a net zero by 2050 pathway and manage transitional climate risk, as it excludes the most significant proportion of the company's Scope 3 emissions.

In Japan, disclosures based on the TCFD recommendations are <u>required for Tokyo Stock Exchange Prime</u> <u>Market-listed companies</u> from April 2022 onwards, which would include Mitsubishi. The TCFD <u>updated</u> <u>guidance</u> states that companies "should describe their key climate-related targets such as those related to GHG emissions... and in line with anticipated regulatory requirements or market constraints or other goals." The Paris Agreement and net zero by 2050 commitments by countries including Japan should be regarded as key "anticipated regulatory requirements" envisaged by the TCFD recommendations. The <u>UN</u> <u>Principles for Responsible Investment (PRI)</u>'s <u>Inevitable Policy Response (IPR)</u> forecasts that governments will be forced to accelerate policy responses to climate change, <u>particularly between 2023 and 2025</u>. As major changes in countries' policies and markets are required in the near term in order to achieve the Paris climate goals, **companies, including Mitsubishi, must set adequate short and mid-term targets to avoid exposure to abrupt regulatory and market shifts caused by rapidly developing climate policy.**

The call for short and mid-term targets is consistent with the asks of major investor initiatives. Climate Action 100+ has <u>stated</u> there is a critical need for long-term ambitions "to be backed by clearer strategies and robust short- and medium-term targets." The initiative makes <u>clear that</u> these targets are necessary "to deliver ambitious emissions reductions within the next decade." Recognising this need, investors themselves are being asked to adopt short-term targets. For example, the UN-convened <u>net zero Asset</u> <u>Owner Alliance</u> expects members to <u>set 2025 interim targets</u> for reduction of portfolio CO₂ equivalent emissions.

At present, Mitsubishi's <u>reduction targets</u> rely on asset sales and fuel switching to hydrogen or ammonia. The former moves emissions off the books of one company to another, unless the sale is clearly for the purpose of the buyer intending to manage down the asset early. The latter, where the hydrogen or ammonia used are generated by burning fossil fuels, merely creates emissions at a different stage in the process. Neither of these approaches are in keeping with the global goal of net zero emissions by 2050.

Lack of Scope 3 emission targets

As a company heavily involved in the sale of carbon intensive products, Scope 3 emissions represent significant transition risk to Mitsubishi. However, the company currently has no Scope 3 emission targets related to the use of its products.

As the <u>Science Based Target initiative (SBTi) notes</u>, "Scope 3 emissions are the largest source of a company's emissions in most sectors, often accounting for several times the impact of its scope 1 and 2 emissions." Recent <u>research from Columbia University</u> also shows that Scope 3 can account for around 75% of LNG lifecycle emissions.

Countries, including most recently the US, are increasingly requiring listed companies to disclose Scope 3 emissions as a part of climate-related disclosures. In March 2022, the <u>US Securities and Exchange</u> <u>Commission (SEC) proposed changes</u> for registrants to disclose Scope 1, 2 and Scope 3 emissions "if material or if the registrant has set a GHG emissions target or goal that includes Scope 3 emissions" for investors to assess companies' management of climate-risk, and "in particular transition risks."

Mitsubishi currently discloses only Category 15 Scope 3 'investment emissions' (emissions associated with the company's investments). According to the GHG protocol's <u>Technical Guidance for Calculating</u>

<u>Scope 3 Emissions</u> "Category 15 is designed primarily for private financial institutions (e.g., commercial banks), but is also relevant to public financial institutions (e.g., multilateral development banks, export credit agencies) and other entities with investments not included in scope 1 and scope 2." Mitsubishi does not disclose other categories of Scope 3 emissions including its likely significant <u>Category 11</u>: emissions from the use of sold products, such as coal or oil and gas.

In order to satisfy investor expectations and demonstrate appropriate climate risk management, Mitsuibishi must not only disclose the full breadth of its Scope 3 emissions, but also set targets to reduce them in line with the climate goals of the Paris Agreement.

No disclosure on critical new technology assumptions

<u>Mitsubishi's net zero by 2050 plan</u> partly relies on coal fired plants co-firing ammonia and CCUS, but the company fails to disclose its assumptions relating to these technologies. For companies that have significant exposure to climate-related financial risks, the <u>TCFD guidelines</u> recommend disclosure of assumptions relating to "technology responses and timing (eg. evolution of products/services, the technology used to produce them, and costs to implement)." Given that ammonia co-firing and CCUS are <u>largely unproven</u>, <u>uneconomical</u>, <u>and not currently commercially scalable</u>, it is critically important for Mitsubishi to disclose its assumptions relating to these technologies if the company wants investors to believe these technologies are at all viable to contribute significantly to its net zero by 2050 commitment.

Mitsubishi's reliance on these unproven technologies is concerning, especially given the opportunity cost this creates for the rollout of renewable technology. Wind and solar power are <u>already faster to build and</u> <u>cheaper to operate</u> than conventional thermal power in all of Mitsubishi's major target markets.

Scenario analysis disclosure inadequate to evaluate risk

Mitsubishi's March 2022 <u>analysis against the IEA's NZE2050 scenario</u> lacks any serious sensitivity analysis for key financial assumptions or variables related to transition risk. Instead, the company only provides high-level descriptions of future demand trends related to each business segment. Without the disclosure of a robust sensitivity analysis with quantitative measures, investors are unable to understand the impact of a net zero by 2050 pathway on the company's financial performance, such as impacts on earnings, cash flow, and the useful life of assets. This lack of disclosure makes it impossible for investors to grasp the true extent of the company's exposure to transition risk and compare it with other companies.

Mitsubishi's risk assessment also makes unexplained departures from the NZE2050 scenario, notably by assuming LNG demand in Asia to remain "firm for the time being," an assumption which lacks any basis in

the NZE2050 report. As noted above, Mitsubishi is also bidding to build infrastructure which would be expected (with an estimated life of 25 years) to run past 2050. If Mitsubishi does not disclose its assumptions regarding LNG demand and price forecasts, investors are unable to assess if the company is minimizing its exposure to climate-related financial risk in order to protect their capital.

The GHG emissions targets and assumptions being requested in the proposal are based on investor expectations as outlined in the TCFD, Climate Action 100+ and other investor initiatives (see details in <u>Table 3</u>). Moreover, companies are already providing disclosure on the targets and assumptions being sought from Mitsubishi.

Engagement has not led to adequate changes

Market Forces and partner NGOs have engaged with Mitsubishi directly since 2019 to raise issues regarding climate risk management. These issues have been raised in formal letters to, as well as in meetings with Mitsubishi. This engagement has failed to demonstrate that Mitsubishi has a plan to align its business strategy with the climate goals of the Paris Agreement or to meet its own net zero by 2050 commitment.

We urge investors to vote for the below proposals at Mitsubishi's June 2022 shareholder meeting and advise Mitsubishi and the broader public of this intention. The co-filers also urge investors to engage with Mitsubishi directly to encourage the production of disclosures requested by these proposals.

Details of shareholder proposals

The proposals seek disclosure of how Mitsubishi plans to align its strategy with its own net zero by 2050 commitment. This improved disclosure is necessary for shareholders to be in a position to evaluate the security of their capital invested in Mitsubishi as the world moves to meet the climate goals Mitsubishi claims to support. The proposals are similar to others that have received significant investor support around the world such as <u>BP</u> (99% support in 2019), <u>General Electric</u> (98% support in 2021) and <u>ExxonMobil</u> (49% support 2021).

The structure of the proposals ensures they do not limit the company's powers to set or vary its strategy, and the proposals do not request the release of commercially confidential information. They provide Mitsubishi broad scope as to how it achieves its plans in light of business relationships and commercial interests in a manner consistent with its own climate commitments.

While the text submitted to Mitsubishi is in Japanese, we provide an English translation below:

Proposal 1: Partial amendment to the Articles of Incorporation (adoption and disclosure of short-term and mid-term greenhouse gas emission reduction targets aligned with the goals of the Paris Agreement)

Details of the proposal

It is proposed that the following provision be added to the Articles of Incorporation:

Chapter: "Decarbonized Society"

Clause: "Adoption and disclosure of a business plan with short-term and mid-term greenhouse gas emission reduction targets aligned with the goals of the Paris Agreement"

- 1. To maintain and promote the long-term value of the Company, given the risks and opportunities associated with climate change, and in accordance with the Company's support for the Paris Agreement, the Company shall adopt and disclose a business plan with short-term and mid-term greenhouse gas emission reduction targets aligned with Article 2.1(a) of the Paris Agreement (the "Paris goals").
- 2. The targets shall cover scope 1, 2 and 3 greenhouse gas emissions and disclose on each scope separately.
- 3. The Company shall report on its progress on an annual basis.

Proposal 2: Partial amendment to the Articles of Incorporation (disclosure of how the company evaluates the consistency of each new material capital expenditure with its net zero greenhouse gas emissions by 2050 commitment)

Details of the proposal

It is proposed that the following provision be added to the Articles of Incorporation: Chapter: "Decarbonized Society"

Clause: "Disclosure of how the Company evaluates the consistency of each new material capital expenditure with a net zero by 2050 pathway"

- To maintain and promote the long-term value of the Company, given the risks and opportunities associated with climate change, and consistent with the Company's commitment to the goal of net zero greenhouse gas emissions by 2050, the Company shall include annually in its corporate reporting an assessment of how a net zero by 2050 pathway would affect the assumptions, costs, estimates, and valuations underlying new material capital expenditure investments and planned future investments in the development of new upstream, midstream and downstream oil and gas assets.
- 2. Omitting proprietary information, the disclosures shall include key assumptions and estimates, including those related to long-term commodity demand, long-term commodity and carbon prices, asset lives, future asset retirement obligations, capital expenditures and impairments.

Shareholder resolutions in Japan & Amendments to Company Articles of Incorporation

• The proposal to amend the company's articles of incorporation in part is the most commonly used approach to make shareholder proposals in Japan, and the approach taken in this proposal. <u>Around two-thirds of the shareholder proposals filed in 2021 took this form</u>.

- Under <u>Japanese corporate law</u>, the <u>sole legal pathway</u> for a **shareholder proposal on climate change** is via an amendment to a company's articles of incorporation.
- The legal effect of such shareholder proposals is the same as the "special resolutions" on climate change filed and passed at UK companies including Barclays, BP, Royal Dutch Shell, Rio Tinto and Anglo American, which take binding effect as part of the companies' constitutions.
 -- <u>Client Earth</u>

Investor expectations on disclosure: climate proposals in the energy sector and demands for disclosure

Similar requests for disclosures around the world have seen strong investor support. The tables below show some recent examples of shareholder resolutions and investor initiatives, including the TCFD, which encourage the disclosure of GHG emissions and related targets, as well as key assumptions including those related to long-term commodity demand, long-term commodity and carbon prices, asset lives, future asset retirement obligations, capital expenditures and impairments. Table 3 also provides examples of companies making these disclosures.

Table 2: Examples of climate resolutions seeking disclosure in various jurisdictions

Company	Year	Country	Status	Resolution Text
Exxon	2022	USA	<u>Filed</u>	Seeking an audited report assessing how applying the assumptions of the IEA Net Zero by 2050 pathway would affect the assumptions, costs, estimates, and valuations underlying its financial statements, including those related to long-term commodity and carbon prices, remaining asset lives, future asset retirement obligations, capital expenditures and impairments.
Duke Energy	2022	USA	Resolution Withdrawn. Agreement Reached	Shareholders request that Duke revise its net zero by 2050 target, and any relevant interim targets, to integrate Scope 3 value chain emissions consistent with guidelines such as the CA100+ and SBTi, or publish an explanation of why the Company does not view inclusion of those emissions as appropriate.
GE	2021	USA	<u>98% vote</u>	Shareholders request the Board of Directors issue a report, at reasonable expense and excluding confidential information, evaluating and disclosing if and how the company has met the criteria of the Net Zero Indicator, or whether it intends to revise its policies to be fully responsive to such Indicator.
Chevron	2021	USA	<u>47.8% vote</u>	Seeking an audited report to shareholders on whether and how a significant reduction in fossil fuel demand, envisioned in the IEA Net Zero 2050 scenario, would affect its financial position and underlying assumptions.
BP	2019	UK	BP recommended shareholders	Include in its Strategic Report and/or other corporate reports, as appropriate, for the year ending 2019 onwards, a description of its strategy which the Board considers, in good faith, to be consistent with the goals of Articles 2.1(a)

vote for the resolution; <u>99% vote</u>	and 4.1 of the Paris Agreement (the 'Paris Goals') as well as capital expenditureand metrics and targets
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Table 3: Investor expectations of disclosure of GHG targets and assumptions, andexamples of disclosure from other companies' reporting

Shareholder proposal disclosure requests	Investor expectations	Other companies disclosure
GHG emissions targets	Scope 3 GHG emissions are increasingly understood as an important indicator of risk, as risk is embedded in buying inputs or selling products that are carbon intensive, as stated in the recent <u>TCFD update in 2021</u> . The <u>TCFD</u> <u>update</u> includes setting a reduction in Scope 1, 2 and 3 targets as an example of quantified climate related targets. <u>Climate Action 100+</u> , an investor initiative of 700 investors representing \$68 trillion in assets, demands companies take action to reduce greenhouse gas emissions in line with the Paris Agreement. It <u>assesses</u> companies on their short term (up to 2025), medium term (2026 to 2035) and long term (2036 to 2050) GHG reduction targets, including Scope 3. The Net Zero Framework of the <u>Paris</u> <u>Aligned Investment Initiative</u> , a global collaboration supported by four regional investor networks – AIGCC (Asia), Ceres (North America), IIGCC (Europe) and IGCC (Australasia), lists "Short & medium term emissions reduction targets (scope 1, 2 and material scope 3)" and "quantified plan to deliver targets" as key metrics for assessing the alignment of assets (such as investee companies) with a net zero emissions by 2050 pathway.	According to <u>TCFD analysis</u> of 2,500 organizations within the MSCI All Country World Index (ACWI Index) from 2017–2019, organizations disclosing Scope 3 GHG emissions grew from 28% to 34%. BP has set a target to reduce the lifecycle emissions intensity of sold energy products (including physically traded products and marketing sales) by 5% by 2025 from 2019 levels, and 15-20% by 2030. Eni has set a target to reduce net scope 1-2 emissions by 65% by 2025 from 2018 levels. The company is also targeting a 35% reduction in scope 1-3 emissions from upstream, midstream and downstream by 2030.

Long-term commodity demand	The Institutional Investors Group on Climate Change (European investor group) discuss the importance of disclosure of assumptions related to assets based on accounting standards in their Investor Expectations for Paris-aligned	Equinor presents net present value sensitivities under four IEA scenarios against the company's central planning scenario, allowing investors to gauge the company's own demand expectations. <u>Santos</u> discloses a similar analysis.
	Accounts: "Accounting assumptions or estimates that ignore structural changes to demand that come from Paris-alignment will tend to misrepresent companies' economic position."	Shell presents its commodity price projections alongside projections from external scenarios, which allows investors to broadly understand the level and direction of the company's demand assumptions.
	The updated <u>TCFD guidance</u> states: "Disclosure of the amount and extent of an organization's assets or business activities vulnerable to climate-related transition risks allows users to better understand potential financial vulnerability regarding issues such as possible impairment or stranding of assets, effects on the value of assets and liabilities, and changes in demand for products or services."	Eni specifies that it views the IEA's Sustainable Development Scenario as its "main reference for assessing the risks and opportunities associated with energy transition".
Long-term commodity and carbon prices	The <u>TCFD update</u> discusses the importance of internal carbon prices for: " Performance measurement – For example, determining carbon-adjusted earnings per share, estimating expected profitability, incentivizing energy saving, identifying revenue opportunities and risks, managing procurement and supply chains Position management – For example, valuation of assets Investment decisions – For example, identifying low-carbon, high-return investment opportunities, planning capital investments, determining cost-benefit and net present value of projects"	 Disclosure of long-term commodity price assumptions is commonplace among energy companies. Shell discloses a comparison between its future oil price assumptions and a range of other scenarios. Equinor discloses its long-term commodity price assumptions, and states clearly that these are not consistent with achieving the IEA NZE or SDS. BP and Eni both disclose long-term commodity price assumptions as well.

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Asset lives and future asset retirement obligations, and impairments	 IIGCC's Investor Expectations for Paris-aligned Accounts discuss the importance of disclosure of assumptions related to asset lives based on accounting standards: "disclosure of the key assumptions on which cash flow projections have been based and management's approach to determining the value assigned to these key assumptionsWhere climate-related risks could significantly affect the recoverable amount of a company's assets, information about how the effect has been factored into recoverable amount calculations would be relevant." "companies to disclose key assumptions used where assets are recognised at fair value. Fair value measurements may incorporate a number of possible scenarios. When the fair value of an asset is affected by climate-related risks including the effect of and potential changes to laws and regulations with respect to managing such risks, a company may need to disclose how it factors climate-related risk into the calculations." "Companies are required to provide a brief description of the nature of any contingent liability, and where practicable, an estimate of its financial effect and an indication of the uncertainties relating to the outflow of resources for settling the obligation" 	Eni discloses the potential impact of climate-related risks and opportunities on an organization's financial position in terms of fair value of assets. "In order to verify the resilience of Eni's asset portfolio, a sensitivity analysis was also carried out on all CGUs (Cash Generating Units) in the upstream sector. The stress test, performed under the IEA SDS scenario, showed that the overall book values of the assets were stable with a reduction in fair value of around 11%, or around 5% in the event of contractual and fiscal recoverability of the costs of direct CO2 emissions."
Capital expenditures	The <u>TCFD update</u> suggests as a metric "the amount of capital expenditure, financing, or investment deployed toward climate- related risks and opportunities."	BP provides a target for capital allocation "by 2025, more than 40% of our capital expenditure will be in our transition growth businesses, and around 50% by 2030."

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