Public Exposure Draft for the sole purpose of SASB’s 30-Day Public Comment Period

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## Biotechnology

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*UoM = Unit of Measure

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<td>Ratio of cost ($ per gigajoule) of non-renewable energy to renewable energy.</td>
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<td>Resource Efficiency</td>
<td>Description of efforts to understand and monitor the effects of pharmaceutical products and their metabolites on ecological and human health throughout the product lifecycle (from manufacturing, use, and disposal).</td>
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<td>Process Mass Intensity (PMI) = quantity of raw materials input (kg) / quantity of active pharmaceutical product (API) output (kg). Report overall PMI and for each of the following inputs: water, organic solvents, reactants, and other.</td>
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<td>Operational Standards and Supply Chain Management</td>
<td>Number and type of FDA enforcement actions taken in response to violations of current good manufacturing practices (cGMP) including: product deemed adulterated, form 483s, suggested recall (Class I, II, III), Warning Letters, Border Alerts, license suspension or revocation, product seizure, Consent Decrees, criminal prosecution.</td>
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<td>Operational Standards and Supply Chain Management</td>
<td>Percentage of facilities and suppliers (by tier) participating in the Rx-360 International Pharmaceutical Supply Chain Consortium audit program, or equivalent third-party audit programs for integrity of supply chain and ingredients (e.g. APIs, chemical, raw material, excipients).</td>
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<td>n/a</td>
<td>Qualitative</td>
<td>Innovation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Description of efforts to understand and monitor the effects of pharmaceutical products and their metabolites on ecological and human health throughout the product lifecycle (from manufacturing, use, and disposal).</td>
<td>n/a</td>
<td>Qualitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td>Resource Efficiency</td>
<td>Total energy consumption (gigajoules) - renewable energy consumption (gigajoules).</td>
<td>GJ</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Ratio of cost ($ per gigajoule) of non-renewable energy to renewable energy.</td>
<td>n/a ($)</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Description of risks and opportunities associated with own greenhouse gas emissions.</td>
<td>n/a</td>
<td>Qualitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Water withdrawals in water-stressed regions - High or Extremely High Baseline Water Stress as defined by the WRI Water Risk Atlas.</td>
<td>m³</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Water intensity (m³ of production water per ton of product) in water-stressed regions - High or Extremely High Baseline Water Stress as defined by the WRI Water Risk Atlas.</td>
<td>m³/ton</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Process Mass Intensity (PMI) = quantity of raw materials input (kg) / quantity of active pharmaceutical product (API) output (kg). Report overall PMI and for each of the following inputs: water, organic solvents, reactants, and other.</td>
<td>metric tons</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td>Disease Migration</td>
<td>Description of risks and opportunities associated with climate change and disease migration, including impacts of malaria, dengue fever, and other vector-borne tropical diseases on non-tropical regions and populations.</td>
<td>n/a</td>
<td>Qualitative</td>
<td>Impact</td>
</tr>
<tr>
<td>Governance</td>
<td>Corruption and Bribery</td>
<td>Description of legal and regulatory judgments, fines, and settlements (including $ amount) related to bribery, corruption, or other unethical practices.</td>
<td>$</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td>Operational Standards and Supply Chain Management</td>
<td>Number and type of FDA enforcement actions taken in response to violations of current good manufacturing practices (cGMP) including: product deemed adulterated, form 483s, suggested recall (Class I, II, III), Warning Letters, Border Alerts, license suspension or revocation, product seizure, Consent Decrees, criminal prosecution.</td>
<td>#</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Percentage of facilities and suppliers (by tier) participating in the Rx-360 International Pharmaceutical Supply Chain Consortium audit program, or equivalent third-party audit programs for integrity of supply chain and ingredients (e.g. APIs, chemical, raw material, excipients).</td>
<td>%</td>
<td>Quantitative</td>
<td>Innovation</td>
</tr>
</tbody>
</table>

*UoM = Unit of Measure

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# Health Care Delivery

<table>
<thead>
<tr>
<th>Category</th>
<th>ESG Issue</th>
<th>Key Performance Indicator (KPI)</th>
<th>UoM*</th>
<th>KPI Type</th>
<th>Impact / Innovation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Social Capital</td>
<td>Quality of Care and Patient Satisfaction</td>
<td>Hospitals Values Based Purchasing Total Performance Score, broken down by Clinical Process Domain score, Outcome Domain score, and Patient Experience Domain Score. Description of legal and regulatory judgments, fines, and settlements (including $ amount) related to medical malpractice. Number of serious reportable events (SREs) as defined by the National Quality Forum. Healthcare-acquired infections, as defined by the CDC’s National Healthcare Safety Network, for: (1) CLABSI (central line-associated bloodstream infections) (2) SSIs (surgical site infections) (3) CAUTIs (catheter-associated urinary tract infections). Excess readmission ratio for pneumonia, acute myocardial infarction, and heart failure, as defined by the Centers for Medicare &amp; Medicaid Services (CMS). Aggregate payments for excess readmissions as part of the Hospital Readmissions Reduction Program.</td>
<td>#</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td>Access for Low Income and Uninsured Patients</td>
<td></td>
<td>Description of alternative pricing mechanisms or programs to extend services to the uninsured. Reimbursements received from Medicare, Medicaid, and Children’s Health Insurance Program. Medicare bonus payments received by physicians for services provided in US Department of Health and Human Services designated Health Professional Shortage Areas (HPSA).</td>
<td>r/a</td>
<td>Qualitative</td>
<td>Innovation</td>
</tr>
<tr>
<td></td>
<td>Employee Recruitment, Development, and Retention</td>
<td>Number of incidents of employee infection in health care facilities. Aggregate turnover rate broken down by specialists, primary care physicians, physician’s assistants, and nurse practitioners. Description of policies and programs of the following type aimed at attracting and retaining employees: mentorship programs, flexible scheduling, leadership development, other. Including participation or utilization rates for each type.</td>
<td>#</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td>Preventative Care and Improved Outcomes</td>
<td>Description of programs designed to encourage patient wellness and preventative care. Number of patients receiving well-visits during the past year. This includes receiving at least one no-cost preventative care service covered under the PPACA.</td>
<td>r/a</td>
<td>Qualitative</td>
<td>Innovation</td>
</tr>
<tr>
<td></td>
<td>Pricing and Billing Transparency</td>
<td>Description of policies or initiatives to ensure that patients are adequately informed about price and alternatives before undergoing a procedure. Describe how pricing information for services (inpatient, outpatient, physician office) is made publically available. Include the number of most common services for which there is publically available pricing information and the volume of total services that they represent.</td>
<td>r/a</td>
<td>Qualitative</td>
<td>Innovation</td>
</tr>
</tbody>
</table>

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<th>KPI Type</th>
<th>Impact / Innovation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environment</td>
<td>Resource Efficiency</td>
<td>Total energy consumption (gigajoules) - renewable energy consumption (gigajoules).</td>
<td>GJ</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Ratio of cost ($ per gigajoule) of non-renewable energy to renewable energy.</td>
<td>n/a ($)</td>
<td>Quantitative</td>
<td>Innovation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Description of risks and opportunities associated with own greenhouse gas emissions.</td>
<td>n/a</td>
<td>Qualitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total weight of regulated medical waste (as defined by Medical Waste Tracking Act of 1988) generation and disposition (e.g. on-site incineration, landfill, Treatment/Storage/Disposal Facility, etc.).</td>
<td>metric tons</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total weight of pharmaceutical waste generation and disposition (e.g. on-site incineration, landfill, Treatment/Storage/Disposal Facility, etc.) Breakdown: (1) RCRA waste; (2) non-RCRA hazardous waste; (3) solid waste.</td>
<td>metric tons</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td>Facilities Designed for Wellness</td>
<td></td>
<td>Description of efforts to construct or retrofit facilities that are designed to achieve patient wellness such as focusing on eliminating toxins (i.e. allergens, mutagens, carcinogens, endocrine disruptors), providing access to daylight, giving occupants control over environmental comfort, maintaining an adequate air change rate, etc. This may include following the Indoor Environmental Quality sections of the following guidelines: • Green Guide for Health Care • ASHRAE Green Healthcare Construction Statement • LEED for Healthcare</td>
<td>n/a</td>
<td>Qualitative</td>
<td>Innovation</td>
</tr>
<tr>
<td>Fraud and Unnecessary Procedures</td>
<td></td>
<td>Description of legal and regulatory judgments, fines, and settlements (including $ amount) related to Medicare and Medicaid Fraud under the False Claims Act.</td>
<td>$</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td>Patient Privacy and Electronic Medical Records</td>
<td></td>
<td>Percentage of patient records that are electronic medical records (EMR) or electronic health records (EHR) and meet CDC definitions for “basic” or “fully functional”. Description of legal and regulatory judgments, fines, and settlements (including $ amount) related to Health Insurance Portability and Accountability Act of 1996 (HIPAA) Privacy and Security Rules violations or The Health Information Technology for Economic and Clinical Health (HITECH) Act violations.</td>
<td>%</td>
<td>Quantitative</td>
<td>Innovation</td>
</tr>
</tbody>
</table>

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# Health Care Distributors

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<th>Impact/ Innovation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Social Capital</td>
<td>Product Safety</td>
<td>Description of legal and regulatory judgments, fines, and settlements (including $ amount) related to product safety.</td>
<td>$</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Description of efforts to minimize health and safety risks of products sold including those related to toxicity/chemical safety (e.g. REACH substances of very high concern), high abuse potential (e.g. Schedule II controlled substances), or delivery (e.g. incorrect dispensing, mislabeling, transmission of disease through reuse of vials, etc.).</td>
<td>n/a</td>
<td>Qualitative</td>
<td>Innovation</td>
</tr>
<tr>
<td>Counterfeit Drugs</td>
<td></td>
<td>Description of methods and technologies used to maintain traceability of products throughout the supply chain (e.g. RFID, ePedigree, serialization, etc.).</td>
<td>n/a</td>
<td>Qualitative</td>
<td>Innovation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Description of due diligence process to qualify suppliers of drug products.</td>
<td>n/a</td>
<td>Qualitative</td>
<td>Innovation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Description of process for alerting customers and business partners of potential or known risks associated with counterfeit products.</td>
<td>n/a</td>
<td>Qualitative</td>
<td>Innovation</td>
</tr>
<tr>
<td>Environmental Capital</td>
<td>Resource Efficiency</td>
<td>Total energy consumption (gigajoules) - renewable energy consumption (gigajoules).</td>
<td>GJ</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Ratio of cost ($ per gigajoule) of non-renewable energy to renewable energy.</td>
<td>n/a ($)</td>
<td>Quantitative</td>
<td>Innovation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Description of risks and opportunities associated with own greenhouse gas emissions.</td>
<td>n/a</td>
<td>Qualitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Payload fuel economy = gallons per ton-miles.</td>
<td>gal/ton-miles</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td>Product Lifecycle Management</td>
<td>Description of initiatives to reduce packaging waste (e.g. dematerialization, recycling, reusable totes, etc.).</td>
<td>n/a</td>
<td>Qualitative</td>
<td>Innovation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Aggregate packaging to product weight ratio.</td>
<td>%</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Description of involvement in product and packaging take-back initiatives.</td>
<td>n/a</td>
<td>Qualitative</td>
<td>Innovation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Amount of product and/or packaging reclaimed through take-back initiatives.</td>
<td>$</td>
<td>Quantitative</td>
<td>Innovation</td>
</tr>
<tr>
<td>Governance</td>
<td>Corruption and Bribery</td>
<td>Description of efforts to minimize conflicts of interest and unethical business practices including mechanisms to ensure compliance.</td>
<td>n/a</td>
<td>Qualitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Description of legal and regulatory judgments, fines, and settlements (including $ amount) related to corruption or bribery, including Foreign Corrupt Practices Act and False Claims Act violations.</td>
<td>$</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
</tbody>
</table>

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## Managed Care

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<th>UoM*</th>
<th>KPI Type</th>
<th>Impact / Innovation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Environmental Capital</strong></td>
<td>Integration of Environmental and Social Factors in Investment Management</td>
<td>Process of integrating ESG factors in investment management – whether conducted internally or externally – including research, investment decisions, engagement and exclusions and focusing on all major asset classes.</td>
<td>n/a</td>
<td>Qualitative</td>
<td>Innovation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Amount of investment in companies that have a high climate risk exposure. These include, but are not limited to, the following industries: Transportation, Banking, Chemicals, Utilities, Healthcare Management Services, Multi-line Insurance, Non-renewable Energy, and Infrastructure &amp; Real Estate.</td>
<td>$</td>
<td>Quantitative</td>
<td>Impacts</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Amount of investments in companies developing innovative environmental or social solutions (e.g. low-carbon technologies, energy efficiency, renewables, social enterprise).</td>
<td>$</td>
<td>Quantitative</td>
<td>Innovation</td>
</tr>
<tr>
<td><strong>Access to Coverage</strong></td>
<td></td>
<td>Medical Loss Ratio (MLR) = medical costs as percentage of premium revenue.</td>
<td>%</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Payments received from Medicare, Medicaid, and Children’s Health Insurance Program.</td>
<td>$</td>
<td>Quantitative</td>
<td>Innovation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Revenue received from rental network activities.</td>
<td>$</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td><strong>Improved Outcomes</strong></td>
<td></td>
<td>Percentage of enrollees in wellness programs by type: diet &amp; nutrition, exercise, stress management &amp; mental health, smoking or alcohol cessation, or other.</td>
<td>%</td>
<td>Quantitative</td>
<td>Innovation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total value of claims for health services not for the treatment of an illness or injury (preventative), as coded in ICD-10, CPT, or HCPCS classification systems.</td>
<td>$</td>
<td>Quantitative</td>
<td>Innovation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Number of customers receiving care from Accountable Care Organizations (as defined by CMS) or enrolled in other outcome-based provider reimbursement programs (e.g. pay for coordination, Patient-Centered Medical Home).</td>
<td>#</td>
<td>Quantitative</td>
<td>Innovation</td>
</tr>
<tr>
<td><strong>Social Capital</strong></td>
<td></td>
<td>Mean Medicare Advantage plan rating (1-5 stars) for each of the following plan types: HMO, local PPO, PFF, regional PPO.</td>
<td>1 to 5</td>
<td>Quantitative</td>
<td>Innovation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Rebates paid due to non-compliance with Section 2718 of the PPACA for Medical Loss Ratio (i.e. the “80/20 Rule”).</td>
<td>$</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Percentage of proposed rate increases receiving “not unreasonable” designation from Health and Human Services (HHS) review or state review (where it is authorized to conduct the review).</td>
<td>%</td>
<td>Quantitative</td>
<td>Innovation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Retention rates (voluntary termination).</td>
<td>%</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Overall rescission rate (involuntary termination) and rescission rate for highest-cost (top 5%) customers.</td>
<td>%</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Median claims processing time.</td>
<td>days</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Percentage of claims denial appeals made by customers that were upheld.</td>
<td>%</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Grievance rate per 1,000 enrollees.</td>
<td>#</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Estimated losses due to fraud.</td>
<td>$</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td><strong>Pricing Transparency and Plan Literacy</strong></td>
<td></td>
<td>JD Power &amp; Associates members rating on “Information and Communication”.</td>
<td>2 to 5</td>
<td>Quantitative</td>
<td>Innovation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Description of policies and practices related to clarity in pricing and coverage including health care literacy programs.</td>
<td>n/a</td>
<td>Qualitative</td>
<td>Innovation</td>
</tr>
</tbody>
</table>

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</tr>
</thead>
<tbody>
<tr>
<td>Governance</td>
<td>Provider Relationships</td>
<td>Median time period in days between the date the physician claim was received by the payer and the date the payer produced the first ERA (electronics remittance advice).</td>
<td>days</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Percentage of providers' healthcare delivery facilities designed to achieve patient wellness such as focusing on eliminating toxins (i.e. allergens, mutagens, carcinogens, endocrine disruptors), providing access to daylight, giving occupants control over environmental comfort, maintaining an adequate air change rate, etc. This may include following the Indoor Environmental Quality sections of the following guidelines: • Green Guide for Health Care • ASHRAE Green Healthcare Construction Statement • LEED for Healthcare.</td>
<td>ft²</td>
<td>Quantitative</td>
<td>Innovation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Description of claim payment procedures and use of medical necessity guidelines.</td>
<td>n/a</td>
<td>Qualitative</td>
<td>Innovation</td>
</tr>
<tr>
<td></td>
<td>Customer Privacy and Technology Standards</td>
<td>Description of legal and regulatory judgments, fines, and settlements (including $ amount) related to Health Insurance Portability and Accountability Act of 1996 (HIPAA) Privacy and Security Rules violations or The Health Information Technology for Economic and Clinical Health (HITECH) Act violations.</td>
<td>$</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Number of cyber security incidents that resulted in actual outcomes of a business process deviating from the expected outcomes for confidentiality, integrity, and availability due to deficiencies or failures of people, process, or technology.</td>
<td>#</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
</tbody>
</table>

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# Medical Equipment and Supplies

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<tbody>
<tr>
<td>Social Capital</td>
<td>Product Safety</td>
<td>List of products recalled with associated revenue in the 12-month period preceding the recall.</td>
<td>$</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Description of legal and regulatory judgments, fines, and settlements (including $ amount) related to product safety.</td>
<td>$</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Fatalities related to products as reported in the FDA Adverse Event Reporting System.</td>
<td>#</td>
<td>Quantitative</td>
<td>Impact</td>
</tr>
<tr>
<td>Ethical Marketing</td>
<td>Description of legal and regulatory judgments, fines, and settlements (including $ amount) related to off-label use of products.</td>
<td>$</td>
<td>Quantitative</td>
<td>Impact</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Description of code of ethics governing off-label use of products including mechanisms to ensure compliance.</td>
<td>n/a</td>
<td>Qualitative</td>
<td>Innovation</td>
<td></td>
</tr>
<tr>
<td>Affordability, Access, and Fair Pricing</td>
<td>Ratio of weighted average rate of net price increases (for all products) to annual increase in U.S. Consumer Price Index.</td>
<td>$</td>
<td>Quantitative</td>
<td>Impact</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Manufacturer discloses average and median price information for each product to customers or their agents (e.g. group purchasing organizations or consultants).</td>
<td>y/n</td>
<td>Qualitative</td>
<td>Innovation</td>
<td></td>
</tr>
<tr>
<td>Resource Efficiency</td>
<td>Total energy consumption (gigajoules) - renewable energy consumption (gigajoules).</td>
<td>GJ</td>
<td>Quantitative</td>
<td>Impact</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Ratio of cost ($ per gigajoule) of non-renewable energy to renewable energy.</td>
<td>n/a ($)</td>
<td>Qualitative</td>
<td>Innovation</td>
<td></td>
</tr>
<tr>
<td>Environmental Capital</td>
<td>Description of risks and opportunities associated with own greenhouse gas emissions.</td>
<td>n/a</td>
<td>Qualitative</td>
<td>Impact</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Discussion of products that contain raw materials facing resource scarcity or availability constraints.</td>
<td>n/a</td>
<td>Qualitative</td>
<td>Impact</td>
<td></td>
</tr>
<tr>
<td>Product Lifecycle Management</td>
<td>Description and associated revenue of products with environmental considerations made at product lifecycle stages such as design, procurement, manufacturing, distribution, use, and end-of-life. Efforts may include elimination of toxics, use of recycled materials, reduced packaging, design for consolidated shipping, low energy consumption products, design for take back, labeling for recycling, etc.</td>
<td>$</td>
<td>Quantitative</td>
<td>Innovation</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Description of Extended Producer Responsibility (EPR) initiatives to promote manufacturer take-back, reuse, or adequate dispose at the end of the lifecycle.</td>
<td>n/a</td>
<td>Qualitative</td>
<td>Innovation</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Original sales value of product taken back, reused, or donated through Extended Producer Responsibility (EPR) initiatives.</td>
<td>$</td>
<td>Quantitative</td>
<td>Innovation</td>
<td></td>
</tr>
<tr>
<td>Corruption and Bribery</td>
<td>Description of legal and regulatory judgments, fines, and settlements (including $ amount) related to violations of the Foreign Corrupt Practices Act.</td>
<td>$</td>
<td>Quantitative</td>
<td>Impact</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Description of legal and regulatory judgments, fines, and settlements (including $ amount) related to providing kickbacks to physicians.</td>
<td>$</td>
<td>Quantitative</td>
<td>Impact</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Description of code of ethics governing interactions with healthcare professionals including mechanisms to ensure employee compliance.</td>
<td>n/a</td>
<td>Qualitative</td>
<td>Innovation</td>
<td></td>
</tr>
<tr>
<td>Operational Standards and Supply Chain Management</td>
<td>Number and type of FDA enforcement actions taken in response to violations of current good manufacturing practices (cGMP) including: product deemed adulterated, form 483s, suggested recall (Class I, II, III), Warning Letters, Border Alerts, license suspension or revocation, product seizure, Consent Decrees, criminal prosecution.</td>
<td>#</td>
<td>Quantitative</td>
<td>Impact</td>
<td></td>
</tr>
<tr>
<td></td>
<td>% of facilities and suppliers (by tier) participating in third-party audit programs for integrity of supply chain and products (e.g. materials, devices, packaging, etc.).</td>
<td>%</td>
<td>Quantitative</td>
<td>Innovation</td>
<td></td>
</tr>
</tbody>
</table>

Please visit [www.sasb.org/sustainability-standards/public-comment/](http://www.sasb.org/sustainability-standards/public-comment/) to provide comments on this Standard.

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| Description of efforts to maintain traceability within the supply chain, particularly with respect to wholesalers, re-packagers, contract distributors. | n/a | Qualitative | Innovation |

* UoM = Unit of Measure