November 29, 2020

Dear SASB Standards Board,

Please find our comments regarding the revision of the Conceptual Framework and Rules of Procedure. We fully support the SASB mission and understand that updating the financial materiality concept is an important step and will help make the reported data more useful in our investment process.

John Streur
President & CEO
Calvert Research and Management
Questions for Stakeholders – Conceptual Framework

**Question 1: Global applicable sustainability accounting standards**

Environmental and social topics may be financially material across all countries in the world, but governance topics vary by countries in terms of financial materiality. We would propose SASB to develop a materiality map by country/country group in addition to and similar to the existing one by industry. The country groups/clusters can be classified by DM/EM or other country-level ESG metrics.

**Question 2: Approach to governance**

Calvert understands SASB’s approach to governance and believes its description of its approach is sufficiently clear. In addition, we would encourage SASB to describe its approach to governance in its Conceptual Framework, so that users understand the difference between more traditional views of corporate governance (e.g. board, accounting, ownership & control and pay issues) and, SASB’s approach to governance, which emphasizes risk oversight related to environmental, social capital, and human capital topics. Calvert would also suggest that SASB, in time, provide examples of quality/leading practices related to environmental, social capital and human capital governance, so that investors have examples to use in conversations with companies and companies have some additional guidance when implementing practices that work for their businesses.

**Question 3: Definition of financial materiality**

1. As proposed in the first section, financially material shall not only be evaluated by industry, but also by country.
2. The definition in paragraph 23 is clear and understandable.
3. As for paragraph 26, we would propose adding "international norms and industry best practices" in addition to applicable laws and regulations given that many sustainability discourse is not mandatory and is outside the scope of laws and regulations.

**Question 4: Characteristics of topics and metric selection**

1. Paragraph 38: comparable not only across companies but also across the company's own history. If the company changes accounting methods, they shall state how the method is different from the past, and restate the data 1-2 years ago.

**Question 5: The Conceptual Framework and Rules of Procedure as complementary, holistic documents**

No comment

**Question 6: Additional comments**

No comment
Questions for Stakeholders – Rules of Procedure

Question 7: Operating procedures, standards updates
Yes, clearly outlines operating procedures and process. Further clarification on determination of "cost effectiveness" as relates to disclosure metrics would be helpful. Also perhaps discussion on how any potential issues/dissent at a board level is resolved (i.e. when voting on a proposed standard).

Question 8: Operating procedures, standard setting agenda
Generally very clear and consistent with mission of SASB and objectives of standards. One question under "Exposure Draft Deliberations" how does the Standard Board determine when a vote is needed and when it is not?

Given SASB's move to be more global, the procedures do not explicitly address the expansion of reach to different stakeholders globally. Also, per comment above, how does the regional specifics play into projects and research in determining if an issue can be addressed? A possible solution can vary depending on market (i.e. developed vs emerging for example).

Question 9: Stakeholder participation in standard-setting
Yes, very clear. Per above comment, may want to address how seeing participating globally, if that changes.

Question 10: Governance structure
More description of Foundation Board of Directors oversight over Standards Board would be helpful.

Question 11: Complementary, holistic documents
Only feedback and consultation from global stakeholders, as mentioned above.

Question 12: Additional comments
No comment