

Boston Common Asset Management

Investor Call to Action - Ensuring a gender-responsive Corporate Sustainability Due Diligence Directive (CSDDD)

December 8, 2022 Open Letter to 87 Members and Representatives of the European Commission, the European Parliament, and the Council of the European Union*

As the Lead Signatory to an [investor statement](#) that represents almost \$1 trillion (USD) in global assets under management, Boston Common Asset Management urges you to use your positions to ensure that the Corporate Sustainability Due Diligence Directive (CSDDD) captures a gender perspective.

While we are firmly in support of legislation focused on mandatory human rights and environmental due diligence, we also believe that a gender perspective must be intentionally and explicitly captured throughout the CSDDD in order to effectively tackle human rights risks and impacts. This is consistent with the gender guidance provided by the [UN Working Group on Business and Human Rights](#) and the [OECD](#), the European Commission's [Gender Equality Strategy 2020-2025](#) and [Gender Action Plan III](#), as well as recent [statements](#) by dozens of civil society organizations.

However, we are very concerned that as the CSDDD has moved through the legislative process, a gender-responsive approach has not been taken. This includes a [legislative proposal](#) that does not even mention the words “gender” or “women” once in its 70 pages, as well as recent published opinions that address gender very lightly if at all.

We are also disappointed to see that in the [EU Council's finalized position](#) on the CSDDD there is no mention of taking a gender-responsive approach. We believe this is a significant missed opportunity for coherence among the EU's strategy, policies, and activities. We hope that as the European Parliament and individual Member States begin the trilogues for the CSDDD next year, there is an opportunity to explicitly incorporate a gender perspective to ensure that women and girls are not left behind.

As indicated in the investor statement, we ask you to:

1. Recognize the gender-specific impacts of business activities
2. Adjust the list of relevant violations, prohibitions, conventions, and instruments
3. Explicitly articulate the gender-responsive due diligence obligations of companies within the CSDDD

We believe that explicitly capturing a gender perspective in these ways in the CSDDD would make a significant contribution to protecting women's rights and advancing gender equality. If it

remains implicit, progress toward gender equality will remain limited and women and girls will be left behind.

We stand ready to work together with you and invite you to a constructive dialogue on this issue.

Sincerely,

As Lead Signatory to the [Investor Statement](#)

Lauren Compere, Managing Director
Boston Common Asset Management

*Please contact Lauren Compere, Boston Common Asset Management if you would like to receive more details on the outreach list at lcompere@bostoncommonasset.com or for more information on this initiative.