

PANORAMIC NEXT

ESG Engagement & Litigation

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LEXOLOGY



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Panoramic Next: ESG Engagement & Litigation explores the fast-changing landscape surrounding corporate environmental, social and governance (ESG) obligations and risks, and the means through which stakeholders hold corporates to account for them. A global panel of experts analyse key recent trends and developments, with practical takeaways for companies, shareholders and consumers alike.

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Profiles

ABOUT

Dr Robert Kovacs is a partner in the litigation and arbitration team, specialising in international arbitration (commercial and investment), public international law, and business and human rights. He is a solicitor advocate and is dual qualified in Australia and England & Wales. Robert has represented individuals, companies, states and state-owned entities in international disputes across a range of sectors, including renewables, energy, mining, construction, finance, M&A, sport, property and technology. His work focuses on Europe, Asia-Pacific, the Middle East and North Africa. He has acted as counsel under all major arbitration rules, as well as in ad hoc arbitration. Robert also sits as an arbitrator. In addition, he advises clients on ESG issues, including business and human rights, regulatory compliance, supply chain due diligence and climate-related disputes. Robert holds a PhD in international law, is the former co-chair of the Asia-Pacific Forum for International Arbitration, sits on the editorial board of the *Australasian Dispute Resolution Journal* and is an honorary senior fellow at the Melbourne University Law School.

Andrew Fremlin-Key is a partner in the litigation and arbitration team, specialising in media, reputation and information disputes. He advises companies, founders, investors, public figures and NGOs on the evolving legal landscape surrounding ESG-related risk, particularly where environmental or social issues create reputational exposure or regulatory scrutiny. His work includes contentious data governance, human rights-related allegations, supply chain transparency, safeguarding issues and crisis management linked to ESG disclosures or ethical business conduct. He also acts in defamation, privacy, blackmail, breach of confidence and data-related disputes. Andrew has represented stakeholders across the sports sector, including international footballers, Olympic gold medallists, major sports agencies, football club owners, F1 teams and board members of international sporting federations, as well as clients in fashion, the creative industries and charities. He is a regular media commentator on sustainability, reputational risk and governance issues across media outlets including the BBC and Channel 5, as well as in *The Times*, the *Financial Times* and academic legal journals.

Tessa Hall is an associate in the dispute resolution team, focusing on international arbitration, public international law and select litigation matters. She advises clients on complex cross-border disputes and has a particular interest in business and human rights, and climate change litigation, forming part of the firm's ESG offering. Originally from Austria, Tessa studied law there before moving to the UK to convert her degree. Her previous professional experience spans over a decade and includes roles with international organisations, including representing the EU during the 73rd UN General Assembly in New York. Tessa is an active founding board member of an Austrian-based NGO dedicated to strategic human rights litigation and continues to support impactful cases globally.

Ethan Lees is a third-seat trainee in the trust, inheritance and estate disputes team. Prior to this, he worked on the corporate team as a first-seat trainee and paralegal, and in the media and reputation team as a second-seat trainee. With experience as a trustee of a large charity, Ethan is attuned to the aspirations and concerns of organisations and the people who shape them, including leaders seeking to drive transformative change while operating under public scrutiny.

Q&A

WHICH ENTITIES IN YOUR JURISDICTION ARE SUBJECT TO ESG OBLIGATIONS? WHAT IS THE LEGAL OR REGULATORY BASIS FOR THESE OBLIGATIONS?

ESG obligations in the United Kingdom apply across a wide spectrum of organisations, with requirements varying by size, structure and sector. The regulatory landscape combines statutory duties, stock exchange rules and voluntary frameworks, creating a layered and often complex regulatory environment.

The Companies Act 2006 (CA 2006) forms a key statutory regime, requiring medium and large companies to report on principal risks and uncertainties, including environmental and social matters, as part of their strategic reports. Large companies must also produce statements in accordance with section 172 of the CA 2006, which requires directors to promote the success of the company for the benefit of its members as a whole, including specifically the 'impact of the company's operations on the community and the environment'. Quoted companies' strategic reporting duty goes further in requiring disclosure of 'environmental matters (including the impact of the company's business on the environment), the company's employees, and social, community and human rights issues'.

The Streamlined Energy and Carbon Reporting framework, in force since April 2019, obliges quoted companies, large unquoted companies and large limited liability partnerships (LLPs) to disclose annual UK energy use and greenhouse gas emissions. An organisation qualifies as 'large' if it meets two of the following: turnover above £36 million, a balance sheet over £18 million or more than 250 employees.

Under the Energy Savings Opportunity Scheme, 'large undertakings', those with more than 250 employees or meeting combined financial thresholds of £44 million turnover and a £38 million balance sheet, must complete energy audits every four years.

The Climate-related Financial Disclosure Regulations 2022 introduce more extensive reporting duties for relevant public interest entities; Alternative Investment Market listed companies with over 500 employees; UK companies with more than 500 employees and turnover above £500 million; and certain LLPs. Aligned with recommendations of the Financial Stability Board's (FSB) Task Force on Climate-related Financial Disclosures (TCFD), these reporting duties require disclosure across governance, strategy, risk management and metrics. In relation to the TCFD reporting rules, applicable guidance is provided for listed companies through the Financial Conduct Authority's (FCA) Listing Rules, which require premium and standard listed issuers to provide TCFD aligned disclosures on a 'comply or explain' basis. Similarly, financial services firms face additional ESG related expectations under FCA rules, and asset managers, asset owners and insurers must provide TCFD aligned reporting regardless of their size.

In relation to the 'social' element, the Modern Slavery Act 2015 (MSA) consolidates the offences of modern slavery, servitude, forced labour and human trafficking, and imposes related reporting requirements within the UK. The latter apply to in-scope businesses, across sectors, with an annual turnover of over £36 million, by mandating the annual publication of a modern slavery statement under section 54 of the MSA.

It remains to be seen how charities will report on human rights considerations under the updated accounting framework for UK charities, the Statement of Recommended Practice, which applies to accounting periods starting on or after 1 January 2026. One of the key changes is in relation to the trustees' annual report, which must now include information on how a charity is responding to and managing ESG matters. This requirement applies to charities with an income above £15 million, while those below this threshold are encouraged to provide the same information.

While the above are statutory or regulatory frameworks of mandatory application for in-scope entities, voluntary frameworks, such as the UK Stewardship Code 2026 (establishing good practice standards for institutional investors), the Global Reporting Initiative and the Taskforce on Nature related Financial Disclosures operate in parallel.

TO WHICH PRIMARY STAKEHOLDERS ARE ESG OBLIGATIONS OWED? HOW ARE THESE OBLIGATIONS ENFORCED OR MONITORED?

As part of their duty to promote the success of their company under section 172 of the CA 2006, UK company directors must, among other things, have regard to the likely consequences of any decision in the long term, as well as the interests of the company's employees and the company's impact on the community and the environment. As part of this, limited ESG obligations are owed to multiple primary stakeholders, each with distinct interests in corporate ESG performance. Furthermore, there is a requirement that directors have regard to the desirability of the company, maintaining a reputation for high standards of business conduct.

ESG and corporate reputation are deeply interlinked. Reputation can act as both a driver and an outcome of ESG performance, forming a mutually reinforcing cycle. The growing focus on ethical values and sustainability influences business decisions at all levels. Investors increasingly view companies' adherence to ESG values as correlating with reduced risk and competitive advantage, with ESG disclosures now integral to risk analysis and capital allocation. Investors expect transparent, comparable data that is clearly linked to financial performance. While not a regulatory obligation, institutional investors also now demand investor-grade ESG data that can withstand external audit. Further, research indicates that employees demand and benefit from ESG considerations and reporting through higher satisfaction and retention when companies demonstrate genuine commitment to social responsibility and ethical practices.

Consumers themselves – and resulting market demand and pressures – are important in driving ESG commitments in the United Kingdom, particularly large corporate buyers who demand verified disclosures from suppliers as part of procurement processes. Negative media in this regard can have an impact on consumer and investor behaviour. Similarly, overstating a company's ESG credentials can also create reputational and regulatory risk, in addition to litigation risk, particularly due to an increasing focus on 'greenwashing' claims. Stakeholder engagement plays a critical role in materiality assessments, helping companies determine the most relevant ESG issues to focus on, with stakeholders providing valuable insights that directly shape ESG goals and reporting.

WHICH REGULATORS, PUBLIC BODIES OR INDUSTRY GROUPS ARE MOST ACTIVE IN ESG OVERSIGHT, ENFORCEMENT AND LITIGATION IN YOUR JURISDICTION? WHAT ARE THE MOST SIGNIFICANT RECENT DEVELOPMENTS IN THIS AREA?

In the United Kingdom, there is no one public body that is responsible for ESG oversight. One of the most significant regulators is the FCA, which sits alongside active government departments coordinating policy initiatives.

The FCA's Sustainable Disclosure and Investment Labels regime for fund managers, FCA-regulated firms, firms managing investment products for retail investors and distributors of investment products, requires that claims pertaining to a product or service align with its actual attributes. UK fund managers can voluntarily adopt one of four sustainability labels (Sustainability Focus, Improvers, Impact or Mixed Goals) if they meet specific criteria, including investing at least 70 per cent of assets aligned with their sustainability objective. Labelled funds and those using sustainability-related terms must provide tiered disclosures: consumer-facing summaries, detailed pre-contractual disclosures and ongoing annual reports. Additionally, the Financial Services and Markets Act 2000 (Regulated Activities) (ESG Ratings) Order 2025, which will take effect on 29 June 2028, will place ESG rating providers under the supervision of the FCA. The provision of ESG ratings will be classified as a 'specified activity' where the rating could reasonably be expected to influence an investment decision. In these cases, providers will require FCA authorisation and must comply with disclosure requirements before a rating can be given. Since 19 January 2026, the FCA's new prospectus rules also require equity issuers to disclose climate-related risks and opportunities.

Similarly, in 2026, the Department for Business and Trade is expected to finalise a mandatory framework for UK Sustainability Reporting Standards (UK SRS) based on the International Sustainability Standards Board (ISSB) standards, which are expected to complement company law and FCA requirements.

Meanwhile, the UK courts have recently featured in several high-profile cases, including the Supreme Court's decision in *Finch v Surrey County Council*, which held that fossil fuel producers must consider downstream or 'Scope 3' greenhouse gas emissions in their environmental impact assessments. While *Finch* was a judicial review brought against public bodies, 2025 also saw follow-on litigation against private companies. In January 2025, Edinburgh's Court of Session upheld a legal challenge brought by environmental campaigners Greenpeace and Uplift against the decision to grant consents for the untapped Rosebank and Jackdaw oil and gas fields in the North Sea, applying the principles established in *Finch*.

WHAT MECHANISMS EXIST FOR SHAREHOLDERS, INSTITUTIONAL INVESTORS AND OTHER STAKEHOLDERS TO INFLUENCE OR CHALLENGE A COMPANY'S ESG PRACTICES? WHAT LEGAL REMEDIES ARE AVAILABLE WHEN ESG FAILURES RESULT IN HARM?

If a company shareholder (member) in the United Kingdom believes that the directors have failed in their duties under section 172 of the CA 2006, they may seek relief on the company's behalf by bringing a derivative action under Part 11 of the Act. Available remedies can include damages to rectify losses, including damage to reputation. The recent case of *Client Earth v Shell* illustrates an attempt to bring this type of claim on ESG grounds. Client Earth, a minority shareholder, alleged that Shell's directors breached their duties by failing to adopt an adequate climate risk management strategy. The alleged breaches included failing to set appropriate emissions targets, particularly for Scope 3 emissions, and adopting a strategy that lacked a reasonable basis for achieving Shell's

net zero commitments or aligning with the Paris Agreement. The court held that, although environmental impact is a relevant consideration, directors must balance all relevant factors to reach a decision they believe is in the company's best interests for the benefit of its members as a whole.

Alternatively, under section 994 of the CA 2006, a member may petition the court on the basis that the company's affairs are being conducted in a manner unfairly prejudicial to their interests. While a failure to uphold ESG commitments could theoretically support this petition, the member would need to show that the conduct caused prejudice to shareholder value. There are presently no known ESG cases brought under this section, however, for failure to uphold commitments to climate risk management. On 25 February 2026, the Supreme Court overturned the Court of Appeal's earlier decision in *THG Plc v Zedra Trust Company (Jersey) Limited* and confirmed that the Limitation Act 1980 does not apply to unfair prejudice petitions brought under section 994 of the CA 2006. There is therefore no statutory limitation period within which these claims must be commenced.

Strong ESG systems and reporting can help to mitigate the risks of consumer boycotts, investor withdrawal and negative media attention. Regardless of the underlying merits of the litigation, companies will generally want to avoid a public, costly and time-consuming battle with their own shareholders from a reputational standpoint.

HOW ARE COMPANIES IN YOUR JURISDICTION ADDRESSING EMERGING ESG RISKS SUCH AS LACK OF SUPPLY CHAIN TRANSPARENCY, HUMAN RIGHTS VIOLATIONS, INADEQUATE CLIMATE CHANGE ADAPTATION AND GREENWASHING?

As noted above, the MSA consolidates certain offences that constitute human rights abuses commonly observed in supply chains, including human trafficking and forced labour. Section 54 of the MSA, entitled 'transparency in supply chains', requires commercial organisations supplying goods or services with a global annual turnover of over £36 million to prepare an annual slavery and human trafficking statement (MSA statement). This must outline the steps taken to ensure that slavery and human trafficking are not occurring within the organisation or its supply chains, or state explicitly that these steps have not been taken. The MSA statement must be approved by the board (or equivalent body), signed by a director and, where the organisation has a website, published online with a prominent link on the homepage.

Although the MSA has not led to the imposition of significant fines, it has, in recent years, been reviewed by a dedicated House of Lords Sub-Committee and by the UK Parliamentary Joint Committee on Human Rights, both of which broadly recommended strengthening the existing reporting and enforcement mechanisms.

Regulators play a role in monitoring and enforcing limited ESG obligations that apply in the United Kingdom. The UK Digital Markets, Competition and Consumers Act 2024 gives the Competition and Markets Authority (CMA) direct powers to impose fines of up to 10 per cent of global turnover for consumer law breaches. Although these powers are not limited to ESG matters, they can extend to misleading environmental claims or other forms of greenwashing. While the CMA is not yet known to have issued fines specifically for greenwashing, it has investigated brands accused of making unsubstantiated environmental claims and has issued guidance to support compliance

with the Green Claims Code. The Advertising Standards Authority has likewise become increasingly proactive in investigating alleged greenwashing.

HOW IS YOUR JURISDICTION RESPONDING TO INTERNATIONAL ESG FRAMEWORKS AND STANDARDS, SUCH AS TCFD, ISSB OR THE EU CORPORATE SUSTAINABILITY REPORTING DIRECTIVE (CSRD)?

The UK has positioned itself as a relatively early and active adopter of international ESG frameworks, particularly those centred on climate related financial disclosure. TCFD has been the foundation of this approach. It was made a core element of the UK's 2019 Green Finance Strategy, reflecting the government's view that TCFD provides one of the most effective structures for analysing and disclosing climate related financial risks. Listed companies must state in their annual reports whether their disclosures are consistent with TCFD recommendations on a 'comply or explain' basis, and the Climate-related Financial Disclosure Regulations 2022 expanded this requirement to certain publicly quoted and large private companies through their non financial and sustainability information statements. This has effectively embedded TCFD aligned reporting across much of the UK corporate landscape.

The UK is also aligning itself with the next generation of global standards through the ISSB. The ISSB's International Financial Reporting Standards (IFRS) S1 and S2, issued in 2023, build directly on TCFD, and the FSB has confirmed that the ISSB standards represent the continuation of TCFD's work. In 2024, the IFRS Foundation assumed responsibility for monitoring climate related disclosures, signalling a shift towards globally harmonised sustainability reporting. The FCA has expressed support for this type of approach and published Consultation Paper CP26/5, proposing to replace TCFD-aligned requirements with rules based on the UK SRS, on 30 January 2026.

As the UK is no longer an EU member state, it is not bound by the EU Corporate Sustainability Reporting Directive (CSRD). By centring its regime on TCFD and preparing to integrate ISSB standards, the country is moving towards a globally consistent ESG disclosure framework and international standards. While the regimes see significant areas of alignment, key differences do exist. As such, the UK SRS apply a single (financial) materiality test, whereas the CSRD applies a double (financial and impact) materiality test. The resulting scope of the UK system is therefore expected to be narrower.

HOW ARE ESG FACTORS INTEGRATED INTO M&A, FINANCING OR OTHER TRANSACTIONAL ACTIVITIES? WHAT CHALLENGES DO COMPANIES FACE IN COLLECTING, VERIFYING AND DISCLOSING ESG DATA?

ESG factors are now embedded throughout M&A, financing and other transactional processes, influencing how deals are structured and priced, as well as how due diligence is carried out. In M&A, ESG considerations increasingly appear in conditions precedent, warranties and indemnities, and they can materially affect valuation by shaping a target's risk profile and long term resilience. Poor disclosure of ESG risks can delay financing, trigger covenant breaches or lead to post completion impairments, making ESG a core component of transactional risk assessment.

Buyers are expanding due diligence to include human rights practices, emissions profiles, data privacy, labour standards, diversity metrics and climate transition risks across the

value chain. The recent Court of Appeal decision in *Limbu v Dyson Technology Ltd* confirmed that the English courts have jurisdiction to hear claims brought by migrant workers alleging human rights abuses further down the value chain and highlights the importance of in-depth ESG due diligence in transactions to minimise post-transactional litigation and reputational risks.

Nevertheless, companies face challenges in collecting, verifying and disclosing ESG data. Dealmakers frequently report incomplete or inconsistent information, limited benchmarking and a lack of standardised methodologies for comparing targets or quantifying ESG impacts. It has been recognised that issues are particularly acute for Scope 3 emissions, which require data from suppliers, customers and other third parties, and often depend on modelling capabilities that many companies have yet to develop.

Independent third party assurance is increasingly used to strengthen the reliability of ESG disclosures. Assurance providers can validate data at different levels of rigour, from limited to reasonable assurance, with regulatory trends, such as those under the CSRD, pushing the market towards more robust verification over time.

The integration of ESG into transactional activity therefore marks a structural shift in dealmaking. While data quality, standardisation and quantification remain obstacles, regulatory pressure, investor expectations and evolving market practice are driving improvements, including the adoption of specialised technology platforms, enhanced assurance mechanisms and more standardised contractual frameworks.

WHAT TRENDS DO YOU ANTICIPATE IN ESG REGULATION, ENFORCEMENT AND LITIGATION OVER THE NEXT FIVE YEARS?

Over the next five years, ESG regulation, enforcement and litigation are expected to accelerate significantly, driven by rising stakeholder expectations, expanding regulatory frameworks and a rapidly evolving body of climate related case law. Litigation is already increasing across several fronts, including challenges to government and corporate climate strategies, opposition to high emission projects and claims seeking accountability for alleged environmental harms, both within the UK and internationally. According to the '[Global trends in climate change litigation: 2025 snapshot](#)', by the Grantham Research Institute on Climate Change and the Environment, around 20 per cent of climate related cases filed in 2024 targeted companies or their directors and officers, signalling a clear shift towards corporate defendants.

This trend is likely to deepen as claimants draw on influential international legal developments. Landmark advisory opinions (AOs) from the International Tribunal for the Law of the Sea in 2024 and the International Court of Justice (ICJ) and the Inter American Court of Human Rights in 2025 provide important judicial authority, including defining climate change obligations owed by states. As such, the ICJ's July 2025 AO stated that states have binding obligations to protect the climate system for present and future generations. This trio of AOs is also expected to shape arguments seeking to impose similar responsibilities on businesses and their boards.

Regulatory enforcement continues to tighten both in the United Kingdom and internationally, generating an increasingly complex web of statutory and regulatory obligations for stakeholders to navigate. A prominent example is the CMA's new power

under the Digital Markets, Competition and Consumers Act 2024 to regulate environmental claims.

Simultaneously, EU regulatory developments will continue to influence UK based businesses operating in EU markets. From September 2026, the Directive on Empowering Consumers for the Green Transition will, for instance, prohibit generic environmental claims such as 'eco friendly' unless substantiated, and will restrict the use of sustainability labels that lack credible certification. These rules will raise the evidentiary bar for environmental marketing and are likely to shape market expectations beyond the European Union.

Supply chain transparency is set to become another major regulatory focus. The EU's forthcoming Digital Product Passport (DPP) regime, expected to apply to textiles and apparel by 2027, will require detailed, traceable product level data accessible via QR codes. Although the UK has not yet committed to its own DPP system, the EU's roll-out may influence domestic policy discussions, particularly for sectors with complex global supply chains.

These developments point to a future in which ESG related scrutiny becomes more legalistic, data driven and enforcement led. Companies can expect more regulatory action against greenwashing, greater pressure to substantiate environmental claims, supply chain scrutiny and a continued rise in climate related and human rights litigation targeting both corporate entities and their directors.

We also expect to see an increase in internal investigations, which have shifted from a reactive compliance tool to an essential mechanism for managing ESG risk, safeguarding integrity and meeting expanding regulatory expectations. Companies are coming under increasing pressure to detect, analyse and remediate misconduct and ESG impacts earlier and more rigorously than ever before.

The Inside Track

HOW HAS YOUR WORK IN RELATION TO ESG, COLLECTIVE ENGAGEMENT AND LITIGATION EVOLVED OVER THE PAST FIVE YEARS IN RESPONSE TO CHANGING REGULATORY AND MARKET EXPECTATIONS?

Historically, ESG has been treated by some as a tick-box exercise. This is no longer the case. Much of our work previously was traditional compliance led ESG advisory work. However, businesses and charities are coming to us to seek advice on how to incorporate international standards and ESG practices across their whole business and supply chain. We are also seeing more work in UK ESG litigation, as well as international law and human rights claims, which involve a transnational element.

WHAT WAS THE MOST NOTEWORTHY ESG MATTER THAT YOU HAVE WORKED ON RECENTLY AND WHAT LESSONS OR INNOVATIONS EMERGED FROM IT?

We have recently been advising a Japanese-based international banking institution on their global compliance and reporting obligations under the EU CSRD. Given the extensive nature of the reporting obligations and changes resulting from the EU Omnibus Package, this has been a particularly challenging exercise, which has required consistent monitoring of developments and updating of advice to meet the changing regulatory environment.

WHAT ADVICE WOULD YOU GIVE TO COMPANIES OR INVESTORS SEEKING TO NAVIGATE THE EVOLVING ESG LANDSCAPE IN YOUR JURISDICTION?

Treat ESG as a legal obligation, not a voluntary exercise. Ensure data is reliable, public statements are accurate and ESG compliance obligations are met throughout the business and its value chain. ESG data systems need to be robust. Invest in data governance, auditing and independent verification. Poor quality or inaccurate data is a litigation, regulatory and reputational risk. Directors, in particular, need to be trained, and ESG risk should be integrated as a core part of company management. Companies should regularly conduct ESG litigation risk assessments, audit sustainability claims, proactively conduct internal investigations where there are red flags, maintain robust operational level grievance mechanisms and prepare detailed communication strategies.



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