

CDP Iberia 125 Report 2011

Towards A Low Carbon Recovery

On behalf of 551 investors with assets
of US\$ 71 trillion



Report writer:



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2011 Carbon Disclosure Project Investor Members

CDP works with investors globally to advance the investment opportunities and reduce the risks posed by climate change by asking almost 6,000 of the world's largest companies to report on their climate strategies, GHG emissions and energy use in the standardized Investor CDP format. To learn more about CDP's member offering and becoming a member, please contact us or visit the CDP Investor Member section at www.cdproject.net/investormembers

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Brasileira das Entidades
Fechadas de Previdência
Complementar

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AKBANK T.A.S.

Allianz Global Investors
Kapitalanlagegesellschaft
mbH

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Aviva Investors

Bank of America Merrill
Lynch

BlackRock

BP Investment
Management Limited

California Public
Employees' Retirement
System

California State Teachers'
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Calvert Asset
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Inc.

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Management Ltd

Ethos Foundation

Generation Investment
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ING

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NEI Investments

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Management Limited

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Rockefeller & Co., Inc.

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Sompo Japan
Insurance Inc.

Standard Chartered

Sun Life Financial Inc.

TD Asset Management
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The Wellcome Trust

Zurich Cantonal Bank

2011 Carbon Disclosure Project Investor Signatories

Carbon Disclosure Project 2011

551 financial institutions with assets of US\$71 trillion were signatories to the CDP 2011 information request dated February 1st, 2011

Aberdeen Asset Managers
Aberdeen Immobilien KAG mbH
ABRAPP - Associação Brasileira das Entidades Fechadas de Previdência Complementar
Active Earth Investment Management
Acuity Investment Management
Addenda Capital Inc.
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AEGON N.V.
AEGON-INDUSTRIAL Fund Management Co., Ltd
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AIG Asset Management
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Alberta Teachers Retirement Fund
Alcyone Finance
Allianz Elementar Versicherungs-AG
Allianz Group
Altira Group
Amalgamated Bank
AMP Capital Investors
AmpegaGerling Investment GmbH
Amundi AM
ANBIMA – Associação Brasileira das Entidades dos Mercados Financeiro de Capitais
Antera Gestão de Recursos S.A.
APG Group
Aprionis
Aquila Capital
ARIA (Australian Reward Investment Alliance)
Arisaig Partners Asia Pte Ltd
ARK Investment Advisors Inc.
Arma Portföy Yönetimi A.S.
ASB Community Trust
ASM Administradora de Recursos S.A.
ASN Bank
Assicurazioni Generali Spa
ATP Group
Australia and New Zealand Banking Group Limited
Australian Central Credit Union incorporating Savings & Loans Credit Union
Australian Ethical Investment Limited
AustrianSuper
Aviva
Aviva Investors
AXA Group
Baillie Gifford & Co.
Bakers Investment Group (Australia) Pty Ltd
Banco Bradesco S/A
Banco de Credito del Peru BCP
Banco de Galicia y Buenos Aires S.A.
Banco do Brasil S/A
Banco Nacional de Desenvolvimento Econômico e Social - BNDES
Banco Santander
Banesprev – Fundo Banespa de Seguridade Social
Banesto (Banco Español de Crédito S.A.)
Bank of America Merrill Lynch
Bank of Montreal
Bank Sarasin & Cie AG
Bank Vontobel
Bankhaus Schelhammer & Schattera Kapitalanlagegesellschaft m.b.H.
BANKINTER S.A.
BankInvest
Banque Degroof
Barclays

Baumann and Partners S.A.
BAWAG P.S.K. INVEST GmbH
Bayern LB
BayernInvest Kapitalanlagegesellschaft mbH
BBC Pension Trust Ltd
BBVA
Bedfordshire Pension Fund
Bentall Kennedy
Beutel Goodman and Co. Ltd
BioFinance Administração de Recursos de Terceiros Ltda
BlackRock
Blumenthal Foundation
BNP Paribas Investment Partners
BNY Mellon
BNY Mellon Service Kapitalanlage Gesellschaft
Boston Common Asset Management, LLC
BP Investment Management Limited
Brasilprev Seguros e Previdência S/A.
British Columbia Investment Management Corporation (bcIMC)
BT Investment Management
Busan Bank
CAAT Pension Plan
Cadiz Holdings Limited
Caisse de dépôt et placement du Québec
Caisse des Dépôts
Caixa Beneficente dos Empregados da Companhia Siderurgica Nacional - CBS
Caixa de Previdência dos Funcionários do Banco do Nordeste do Brasil (CAPEF)
Caixa Econômica Federal
Caixa Geral de Depositos
Caja de Ahorros de Valencia, Castellón y Valencia, BANCAJA
Caja Navarra
California Public Employees' Retirement System
California State Teachers' Retirement System
California State Treasurer
Calvert Asset Management Company, Inc
Canada Pension Plan Investment Board
Canadian Friends Service Committee (Quakers)
Canadian Imperial Bank of Commerce (CIBC)
CAPESESP
Capital Innovations, LLC
CARE Super Pty Ltd
Carlson Investment Management
Carmignac Gestion
Catherine Donnelly Foundation
Catholic Super
Cbus Superannuation Fund
CCLA Investment Management Ltd
Celeste Funds Management Limited
Central Finance Board of the Methodist Church
Ceres
Christian Super
Christopher Reynolds Foundation
Church Commissioners for England
Church of England Pensions Board
CI Mutual Funds' Signature Global Advisors
Clean Yield Group, Inc.
Cleantech Invest AG
ClearBridge Advisors
Climate Change Capital Group Ltd
CM-CIC Asset Management
Colonial First State Global Asset Management
Comerica Incorporated
Comite syndical national de retraite Bâtiétre
Commerzbank AG
CommInsure
Commonwealth Bank of Australia
Compton Foundation, Inc.
Concordia Versicherungsgruppe
Connecticut Retirement Plans and Trust Funds
Co-operative Financial Services (CFS)
Corston-Smith Asset Management Sdn. Bhd.
CRD Analytics
Crédit Agricole
Credit Suisse
Gruppo Credito Valtellinese

Daegu Bank
Daiwa Securities Group Inc.
de Pury Pictet Turretini & Cie S.A.
DekaBank Deutsche Girozentrale
Deutsche Asset Management Investmentgesellschaft mbH
Deutsche Bank AG
Deutsche Postbank Vermögensmanagement S.A.
Development Bank of Japan Inc.
Development Bank of the Philippines (DBP)
Dexia Asset Management
Dexus Property Group
DnB NOR ASA
Domini Social Investments LLC
Dongbu Insurance
DWS Investment GmbH
Earth Capital Partners LLP
East Sussex Pension Fund
Ecclesiastical Investment Management
Ecofi Investissements - Groupe Credit Cooperatif
Edward W. Hazen Foundation
EEA Group Ltd
Elan Capital Partners
Element Investment Managers
ELETRA - Fundação Celg de Seguros e Previdência
Environment Agency Active Pension fund
Epworth Investment Management
Equilibrium Capital Group
Erste Asset Management
Erste Group Bank
Essex Investment Management Company, LLC
ESSSuper
Ethos Foundation
Eureko B.V.
Eurizon Capital SGR
Evangelical Lutheran Church in Canada Pension Plan for Clergy and Lay Workers
Evii Bank Plc
F&C Management Ltd
FAELCE – Fundacao Coelce de Seguridade Social
FAPERS- Fundação Assistencial e Previdenciária da Extensão Rural do Rio Grande do Sul
FASERN - Fundação COSERN de Previdência Complementar
Fédérés Gestion d'Actifs
FIDURA Capital Consult GmbH
FIM Asset Management Ltd
FIPECQ - Fundação de Previdência Complementar dos Empregados e Servidores da FINEP, do IPEA, do CNPq
FIRA. - Banco de Mexico
First Affirmative Financial Network, LLC
First Swedish National Pension Fund (AP1)
Firstrand Limited
Five Oceans Asset Management Pty Limited
Florida State Board of Administration (SBA)
Folketrygdfondet
Folksam
Fondation CSN
Fondation de Luxembourg
Fondriaria-SAI
Fonds de Réserve pour les Retraites – FRR
Fourth Swedish National Pension Fund (AP4)
FRANKFURT-TRUST Investment-Gesellschaft mbH
Fukoku Capital Management Inc
FUNCEF - Fundação dos Economistas Federais
Fundação AMPLA de Seguridade Social - Brasiletros
Fundação Atlântico de Seguridade Social
Fundação Atilio Francisco Xavier Fortana
Fundação Banrisul de Seguridade Social
Fundação de Assistência e Previdência Social do BNDES - FAPES
FUNDAÇÃO ELETROBRÁS DE SEGURIDADE SOCIAL - ELETROS
Fundação Forluminas de Seguridade Social - FORLUZ
FUNDAÇÃO ITAUBANCO
Fundação Itaúsa Industrial
Fundação Promon de Previdência Social
Fundação Vale do Rio Doce de Seguridade Social - VALIA
Fundação Rede Ferroviária de Seguridade Social – Refer
Fundação Sistel de Seguridade Social (Sistel)
FUNDIÁGUA - FUNDAÇÃO DE PREVIDENCIA COMPLEMENTAR DA CAESB

Futuregrowth Asset Management	KPA Pension	NH-CA Asset Management
Gartmore Investment Management Ltd	La Banque Postale Asset Management	Nikko Asset Management Co., Ltd.
GEAP Fundação de Seguridade Social	La Financiere Responsable	Nikko Cordial Securities
Generali Deutschland Holding AG	Lampe Asset Management GmbH	Nissay Asset Management Corporation
Generation Investment Management	Landsorganisationen i Sverige	NORD/LB Kapitalanlagegesellschaft AG
Genus Capital Management	LBBW - Landesbank Baden-Württemberg	Nordea Investment Management
Gjensidige Forsikring ASA	LBBW Asset Management Investmentgesellschaft mbH	Norfolk Pension Fund
GLS Gemeinschaftsbank eG	LD Lonmodtagernes Dyrtdisfond	Norges Bank Investment Management (NBIM)
Goldman Sachs Group Inc.	Legal & General Investment Management	North Carolina Retirement System
GOOD GROWTH INSTITUT für globale Vermögensentwicklung mbH	Legg Mason, Inc.	Northern Ireland Local Government Officers' Superannuation Committee (NILGOSC)
Governance for Owners	LGT Capital Management Ltd.	Northern Trust
Government Employees Pension Fund ("GEPP"), Republic of South Africa	LIG Insurance Co., Ltd	Nykredit
Green Cay Asset Management	Light Green Advisors, LLC	Oddo & Cie
Green Century Capital Management	Living Planet Fund Management Company S.A.	OECO Capital Lebensversicherung AG
Groupe Crédit Coopératif	Local Authority Pension Fund Forum	Old Mutual plc
Groupe Investissement Responsable Inc.	Local Government Super	OMERS Administration Corporation
GROUPE OFI AM	Local Super	Ontario Teachers' Pension Plan
Grupo Banco Popular	Lombard Odier Darier Hentsch & Cie	OP Fund Management Company Ltd
Grupo Santander Brasil	London Pensions Fund Authority	Oppenheim Fonds Trust GmbH
Gruppo Credito Valtellinese	Lothian Pension Fund	Opplysningsvesenets fond (The Norwegian Church Endowment)
Gruppo Montepaschi	Lupus alpha Asset Management GmbH	OPSEU Pension Trust
Guardian Ethical Management Inc	Macif Gestion	Oregon State Treasurer
Guardians of New Zealand Superannuation	Macquarie Group Limited	Orion Asset Management LLC
Guosen Securities Co., LTD.	MAMA Sustainable Incubation AG	Parnassus Investments
Hang Seng Bank	Man	Pax World Funds
Harbourmaster Capital	Maple-Brown Abbott Limited	Pensioenfonds Vervoer
Harrington Investments, Inc	Marc J. Lane Investment Management, Inc.	Pension Denmark
Hauck & Aufhäuser Asset Management GmbH	Maryland State Treasurer	Pension Fund for Danish Lawyers and Economists
Hazel Capital LLP	Matrix Asset Management	Pension Protection Fund
HDFC Bank Ltd	McLean Budden	Pensionsmyndigheten
Health Super Fund	MEAG MUNICH ERGO Asset Management GmbH	PETROS - The Fundação Petrobras de Seguridade Social
Healthcare of Ontario Pension Plan (HOOPP)	Meeschaert Gestion Privée	PFA Pension
Henderson Global Investors	Meiji Yasuda Life Insurance Company	PGGM
Hermes Fund Managers	Mendesprev Sociedade Previdenciária	Phillips, Hager & North Investment Management Ltd.
HESTA Super	Merck Family Fund	PhiTrust Active Investors
HSBC Global Asset Management (Deutschland) GmbH	Meritas Mutual Funds	Phoenix Asset Management Inc.
HSBC Holdings plc	MetallRente GmbH	Pictet Asset Management SA
HSBC INKA Internationale Kapitalanlagegesellschaft mbH	Metrus – Instituto de Seguridade Social	PKA
Hyundai Marine & Fire Insurance. Co., Ltd.	Metzler Investment GmbH	Pluris Sustainable Investments SA
Hyundai Securities Co., Ltd.	MFS Investment Management	PNC Financial Services Group, Inc.
Ibgeana Society of Assistance and Security SIAS / Sociedade Ibgeana de Assistência e Seguridade (SIAS)	Midas International Asset Management	Pohjola Asset Management Ltd
IDBI Bank Ltd	Miller/Howard Investments	Portfolio 21 Investments
Ilmarinen Mutual Pension Insurance Company	Mirae Asset Global Investments Co. Ltd.	Porto Seguro S.A.
Impax Group plc	Mirae Asset Securities Co., Ltd.	PREVHAB PREVIDÊNCIA COMPLEMENTAR
IndusInd Bank Limited	Missionary Oblates of Mary Immaculate	PREVI Caixa de Previdência dos Funcionários do Banco do Brasil
Industrial Bank (A)	Mistra, Foundation for Strategic Environmental Research	PREVIG Sociedade de Previdência Complementar
Industrial Bank of Korea	Mitsubishi UFJ Financial Group (MUFG)	Provincial Rheinland Holding
Industry Funds Management	Mizuho Financial Group, Inc.	Prudential Investment Management
Infrastructure Development Finance Company	Mn Services	Psagot Investment House Ltd
ING	Monega Kapitalanlagegesellschaft mbH	PSP Investments
Insight Investment Management (Global) Ltd	Morgan Stanley	PSS - Seguridade Social
Instituto de Seguridade Social dos Correios e Telégrafos- Postalis	Motor Trades Association of Australia Superannuation Fund Pty Ltd	Q Capital Partners Co. Ltd
Instituto Infraero de Seguridade Social - INFRAPREV	Mutual Insurance Company Pension-Fennia	QBE Insurance Group
Instituto Sebrae De Seguridade Social - SEBRAEPREV	Natcan Investment Management	Rabobank
Insurance Australia Group	Nathan Cummings Foundation, The	Raiffeisen Schweiz
Investec Asset Management	National Australia Bank	Railpen Investments
Irish Life Investment Managers	National Bank of Canada	Rathbones / Rathbone Greenbank Investments
Itau Asset Management	National Grid Electricity Group of the Electricity Supply Pension Scheme	Real Grandeza Fundação de Previdência e Assistência Social
Itaú Unibanco Holding S A	National Grid UK Pension Scheme	Rei Super
Janus Capital Group Inc.	National Pensions Reserve Fund of Ireland	Reliance Capital Ltd
Jarislowsky Fraser Limited	National Union of Public and General Employees (NUPGE)	Resolution
JPMorgan Chase & Co.	NATIXIS	Resona Bank, Limited
Jubitz Family Foundation	Nedbank Limited	Reynders McVeigh Capital Management
Jupiter Asset Management	Needmor Fund	RLAM
Kaiser Ritter Partner (Schweiz) AG	NEI Investments	Robeco
KB asset Management	Nelson Capital Management, LLC	Rockefeller Financial
KB Kookmin Bank	Nest Sammelstiftung	Rose Foundation for Communities and the Environment
KBC Asset Management NV	Neuberger Berman	Royal Bank of Canada
KDB Asset Management Co., Ltd.	New Amsterdam Partners LLC	Royal Bank of Scotland Group
KEPLER-FONDS Kapitalanlagegesellschaft m. b. H.	New Mexico State Treasurer	RREEF Investment GmbH
KW Bankengruppe	New York City Employees Retirement System	SAM Group
KlimaNVEST	New York City Teachers Retirement System	SAMPENSION KP LIVSFORSIKRING A/S
KLP	New York State Common Retirement Fund (NYSCRF)	SAMSUNG FIRE & MARINE INSURANCE
Korea Investment Management Co., Ltd.	New Zealand Earthquake Commission	Samsung Securities
The Korea Teachers Pension (KTP)	Newton Investment Management Limited	Sanlam
Korea Technology Finance Corporation (KOTEC)	NGS Super	Santa Fé Portfolios Ltda

SAS Trustee Corporation
Sauren Finanzdienstleistungen GmbH & Co. KG
Schroders
Scotiabank
Scottish Widows Investment Partnership
SEB
SEB Asset Management AG
Second Swedish National Pension Fund (AP2)
SEIU Master Trust
Seligson & Co Fund Management Plc
Sentinel Investments
SERPROS - Fundo Multipatrocinado
Seventh Swedish National Pension Fund (AP7)
Shinhan Bank
Shinhan BNP Paribas Investment Trust Management Co., Ltd
Shinkin Asset Management Co., Ltd
Siemens Kapitalanlagegesellschaft mbH
Signet Capital Management Ltd
SMBC Friend Securities Co., LTD
Smith Pierce, LLC
SNS Asset Management
Social(k)
Sociedade de Previdencia Complementar da Dataprev - Prevdاتا
Solaris Investment Management Limited
Sompo Japan Insurance Inc.
Sopher Investment Management
SPF Beheer bv
Sprucegrove Investment Management Ltd
Standard Chartered
Standard Chartered Korea Limited
Standard Life Investments
State Bank of India
State Street Corporation
StatewideSuper
StoreBrand ASA
Strathclyde Pension Fund
Stratus Group
Sumitomo Mitsui Banking Corporation
Sumitomo Mitsui Card Company, Limited
Sumitomo Mitsui Finance & Leasing Co., Ltd
Sumitomo Mitsui Financial Group
The Sumitomo Trust & Banking Co., Ltd.
Sun Life Financial Inc.
Superfund Asset Management GmbH
SUSI Partners AG
Sustainable Capital
Svenska Kyrkan, Church of Sweden
Swedbank AB
Swiss Re
Swisscanto Holding AG
Syntrus Achmea Asset Management
T. Rowe Price
T. SINAI KALKINMA BANKASI A.S.
T.GARANTI BANKASI A.S.
Tata Capital Limited
TD Asset Management Inc. and TDAM USA Inc.
Teachers Insurance and Annuity Association – College Retirement Equities Fund (TIAA-CREF)
Telluride Association
Tempis Asset Management Co. Ltd
Terra Forvaltning AS
TerraVerde Capital Management LLC
The Brainerd Foundation
The Bullitt Foundation
The Central Church Fund of Finland
The Collins Foundation
The Co-operative Asset Management
The Co-operators Group Ltd
The Daly Foundation
The GPT Group
The Hartford Financial Services Group, Inc.
The Japan Research Institute, Limited
The Joseph Rowntree Charitable Trust
The Local Government Pensions Institution
The Pension Plan For Employees of the Public Service Alliance of Canada
The Pinch Group
The Presbyterian Church in Canada

The Russell Family Foundation
The Shiga Bank, Ltd.
The Standard Bank Group
The United Church of Canada - General Council
The University of Edinburgh Endowment Fund
The Wellcome Trust
Third Swedish National Pension Fund (AP3)
Threadneedle Asset Management
Tokio Marine & Nichido Fire Insurance Co., Ltd.
Toronto Atmospheric Fund
Trillium Asset Management Corporation
Triodos Investment Management
Tryg
UBS
UniCredit Group
Union Asset Management Holding AG
Unipension
UNISON staff pension scheme
UniSuper
Unitarian Universalist Association
United Methodist Church General Board of Pension and Health Benefits
United Nations Foundation
Universities Superannuation Scheme (USS)
Vancity Group of Companies
VCH Vermögensverwaltung AG
Veris Wealth Partners
Veritas Investment Trust GmbH
Vermont State Treasurer
Vexiom Capital, L.P.
VicSuper Pty Ltd
Victorian Funds Management Corporation
VietNam Holding Ltd.
Vision Super
VOLKSBANK INVESTMENTS
Waikato Community Trust Inc
Walden Asset Management, a division of Boston Trust & Investment Management Company
WARBURG - HENDERSON Kapitalanlagegesellschaft für Immobilien mbH
WARBURG INVEST KAPITALANLAGEGESELLSCHAFT MBH
Wells Fargo & Company
West Yorkshire Pension Fund
WestLB Mellon Asset Management (WMAM)
Westpac Banking Corporation
White Owl Capital AG
Winslow Management, A Brown Advisory Investment Group
Woori Bank
Woori Investment & Securities Co., Ltd.
YES BANK Limited
York University Pension Fund
Youville Provident Fund Inc.
Zegora Investment Management
Zevin Asset Management
Zurich Cantonal Bank

Figure 1: 2011 Signatory Investor Breakdown

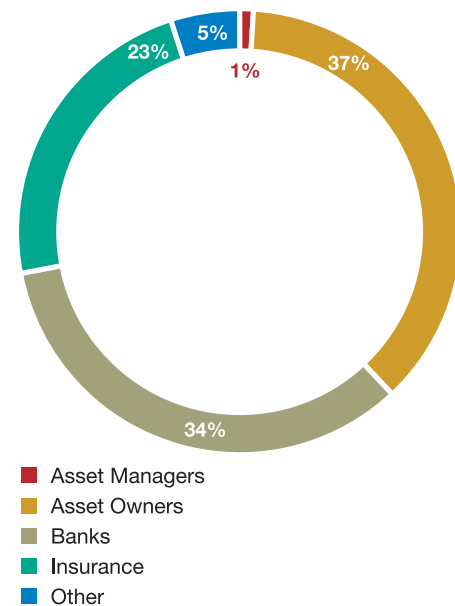
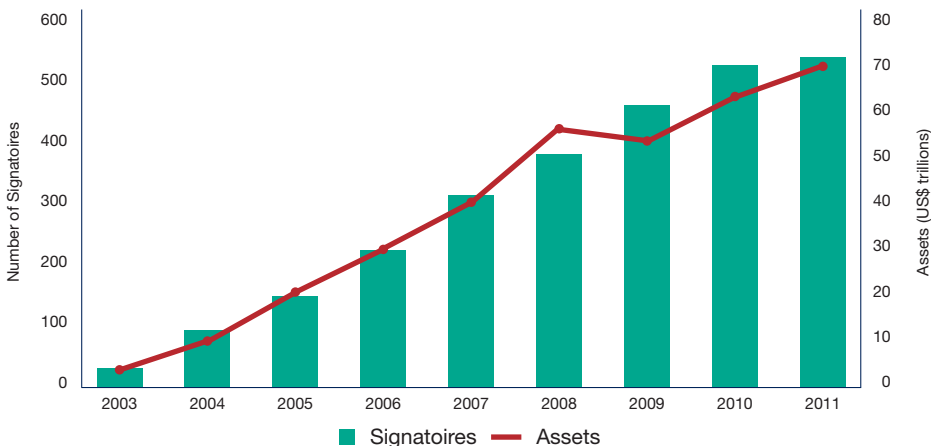


Figure 2: CDP Investor Signatories & Assets over time



CEO Foreword

Corporations, investors and governments today are faced with a choice: to compete aggressively for finite resources, or to advance towards a low-carbon economy that enables sustainable, profitable growth, whilst reducing reliance on increasingly scarce materials.

Last year global energy-related carbon dioxide emissions reached a record high. The International Energy Agency estimates made for bleak reading but compounded the necessity to take bold and decisive action if we are to have any chance of limiting temperature increase to the 2°C level agreed by world leaders to protect against catastrophic climate change.

What's more, rising energy demands are competing for a limited supply of fossil fuels. The competition for increasingly scarce natural resources is putting pressure on commodity prices and having a growing impact both socially and economically. It is clear that today, more than ever, we must build momentum to decouple economic growth from emissions.

Managing carbon emissions and protecting the business from climate change impacts are fundamental to achieving sustainable and strong shareholder returns. Earlier this year, investment consultancy Mercer released a report concluding that the best way for institutional investors to manage portfolio risk associated with climate change may be to shift 40% of their portfolios into climate-sensitive assets with an emphasis on those that can adapt to a low-carbon environment.

An important part of an investor's strategy should be to engage with the companies in which they invest to encourage performance improvement. Carbon Action is a new initiative launched by CDP this year. It is driven by a leading group of investors to encourage their portfolio companies to reduce emissions by investing in emissions reducing activities with a satisfactory payback period. Carbon Action reflects a growing recognition that there is a huge range of carbon reducing activities that companies can undertake that have a very clear business case. It is therefore in the interests of all investors and not just the more active owners of investments to ensure these actions are taken.

As the management of carbon continues to move into companies' core business strategies and mainstream investment thinking, demand for primary corporate climate change information grows around the world. As well as working on behalf of 551 institutional investors to gather relevant information from large corporations around the world, CDP is also working with global businesses and governments to strengthen the resilience and sustainability of their supply chains through the CDP Supply Chain program. CDP Cities has launched to help the world's major cities reduce climate change risk and bolster economic growth; and CDP Water Disclosure is now in its second year of working with major global companies to improve water management. A key part of CDP's strategy is to ensure the effective use of data collected. To assist with this companies are able to obtain tools that help them to measure, report and manage carbon more effectively, through CDP Reporter Services.

It is through partnerships that CDP can achieve the largest impact. In Spain and Portugal we are delighted to be working with our local partners, ECODES, Euronatura and PWC. In addition, we highly value the continued support of our Global Advisor, PwC, as well as that of Accenture, Microsoft, SAP and Bloomberg. These and our other partners around the world are integral to the acceleration of CDP's mission.

Whilst we wait patiently for much needed global regulation, business must continue to forge ahead, innovate and seek out opportunities by doing more with less. The decisions that perpetuate a legitimate, low-carbon and high growth economy will bring considerable value to those that have the foresight to make them. The information contained in this report and the companies' responses assist in illuminating that path.

Paul Simpson

CEO

Carbon Disclosure Project

Letter from Spain

Climate change is recognized as one of the biggest challenges of the 21st century. The economic model of recent decades has proven itself to be flawed and unsustainable and the current financial and economic crisis rather than adding uncertainty or acting as an excuse to avoid dealing with this challenge should spur us to bring about a change in the economic system that promotes the inevitable transition to a green economy, sustainable and low in carbon emissions.

This transition requires, however significant leadership and shared efforts by all relevant stakeholders. If we act together we will make it possible for new production and consumption models that appropriately integrate the environmental component to become prime drivers of economic growth, creating new areas of economic activity and new quality employment opportunities. This will also place us on a path of greater competitiveness in the international arena, within a medium and longer term time horizon.

In this new path, the role of the private sector is of paramount importance. The integration of climate change into companies' strategic plans, will increase their competitiveness in the short term by identifying opportunities to reduce their carbon footprint. Moreover, it will be possible to assess and anticipate the potential risks associated with the impacts of climate change.

And within a broader time horizon, in the context of an economy that must decouple itself from the emissions of greenhouse gases by 2050 in order to ensure sustainability, private sector is a key player expected to drive change by taking advantage of opportunities created in strategic industries. As citizens and civil society more generally become increasingly informed and aware, they are demanding this type of commitment from all the economic and industrial agents.

It is very satisfying to find evidence in the CDP 2011 results, that Spanish and Portuguese companies are engaged in this common task and are making steady strides in the direction of more sustainable and low carbon models. This edition of the report shows the increasingly high percentage of companies in our peninsula that are integrating climate change into their business strategies, that adopt proactive policies to reduce their emissions and that consider it a source of business opportunities. This commitment to the real economy as well as a new approach to addressing business challenges is especially gratifying at a time when the financial economy seems to dominate the scene. Therefore, it should be valued as a good indicator of the maturity of our private sector. However, further work is needed in this endeavor in order to convert the opportunities associated with climate change into a common reality.

Additionally, the public sector must go beyond its leadership role in setting reduction targets sufficiently ambitious to achieve the environmental objective of not exceeding a 2°C rise in temperature and in ensuring that carbon is priced at a level that makes investments in clean technologies profitable. Governments must also put in place mechanisms that attract private investments into these new areas of activity by promoting public-private partnership. The policies that have been useful during the last century will not help us to solve the problems of the 21st century. The Government of Spain has shown a firm commitment in the fight against climate change and has launched various initiatives to promote the transition towards a low carbon economy in our country. We are confident that in the coming years we will see a continuation of these efforts and that the Spanish private sector, as evidenced in the results of CDP2011, will further contribute to the continuity and success of this venture. In order to achieve this, it is vital that companies get more involved, take on greater social, environmental and climate related commitments and that citizens and consumers become more keenly aware of this reality. Therefore, we would like to extend our gratitude to CDP as well as all the participating companies of the 2011 edition, both in Portugal and Spain, for their efforts as well as the admirable results and encourage all involved to continue to work in this same direction.



Teresa Ribera Rodríguez
Secretary of State
for Climate Change in Spain

Letter from Portugal

Climate change is an unprecedented global challenge that is impacting on economic and social development worldwide. The challenges ahead are of great magnitude, therefore all citizens; the public and the private sector; scientists and policy-makers, should engage in promoting and implementing a proper use of both scientific knowledge and the principles of economic sustainability. In addition, it is crucial that all stakeholders identify and work with the solutions that the world is demanding.

In spite of the current economic adverse situation, Portugal has an enormous wealth that deserves further investigation and should be able to find a way out of the crisis by promoting and exploring the opportunities of a “greener economy”, achieving the objectives of energy security, sustainability and competitiveness. In fact, Governments and private sector industries must accelerate the transition to a low-carbon economy at a global level. To start with, they need to take into account the climatic vulnerability of the current economic model. Secondly, they have to manage their resources and their emissions in a more efficient way.

The Carbon Disclosure Project requests companies to disclose their greenhouse gas emissions and climate change strategies on behalf of 551 signatories with US\$71 trillion in assets. Company responses are being scored on the quality and completeness of their carbon disclosure and on their carbon performance. At the same time, it is worth noting that businesses themselves are moving in the right direction by undertaking their own assessments. In this framework, the CDP will contribute to the internationalization of Portuguese companies by making public company responses and the Iberia 125 report including the company scores on disclosure and performance available on the CDP website. Furthermore, CDP will promote the visibility of Portuguese companies and this will render them more attractive to long-term investors who are committed to energy efficiency, renewable energy and low-carbon exposure.

The assessment of Portuguese companies will assist in formalizing and displaying its climate strategy. Such a strategy should: a) take into account Portugal’s economic, geographic and social attributes; b) implement proactive mitigation and adaptation policies; and c) take advantage of the opportunities for change that are arising out of the current crisis. Following those recommendations - and having Portuguese emissions in 1990 as the reference - Portugal will be able to meet the European target of reducing greenhouse gas emissions by 20% or 30% until 2020.

The negotiation of a future climate regime post 2012 is currently under way and in a moment like this, the MAMAOT acknowledges the importance of CDP assessing Portugal’s business sector efforts to mitigate and adapt to climate change, and also by promoting the international visibility of Portuguese companies.

Assunção Cristas

Minister of Agriculture, Sea,
Environment and Regional Planning

Prologue from ECODES

We live in times of great uncertainty and of multiple crises. Spain, Portugal and many other countries are experiencing a deep and unprecedented economic and social crisis. Experts as well as ordinary citizens spend their mornings carefully scrutinizing the evolving risk premium paid by their governments. Economic jargon is on the front pages of daily newspapers. Days pass at a frenetic pace while there are weeks that seem like years... Therefore it is not surprising that the media - and consequently the political class - live by and for the short-term.


Meanwhile, there are environmental problems that have been developing over many years that we must now deal with and that will require a great and long-term effort from all of us. Indicators of environmental unsustainability are increasing across the globe. The recent accident in Fukushima, Japan, for example, has demonstrated that the shift towards a global energy system that is more efficient, safe and renewable is urgently needed. The British Petroleum oil spill leads us towards similar conclusions. Evidence of evolving climate change is becoming more worrisome. In short, the "environmental risk premium" is also growing.

The challenge that we now face is how to deal simultaneously with the urgent and important economic and financial crisis, the urgent and important social crisis and the urgent and important environmental crisis. All these crises coexist, overlap and are interdependent and should therefore be resolved in an integrated fashion. And in order to be able to succeed in this endeavor, the firm commitment of companies is essential. They all must exercise their social responsibility and integrate their internal search for value with the objective of creating value for society at large.

Companies which have voluntarily completed the Carbon Disclosure Project (CDP) questionnaire have demonstrated that they are working to tackle climate change. The CDP signatory financial institutions use this information when making investment decisions, thus creating a virtuous circle that rewards the more proactive companies and that also promotes a shift towards the use of environmental policies in the tens of thousands of small and medium enterprises that are part of their supply chains. All of these companies are creating shared value for themselves and for society.

Carbon Disclosure Project has established itself as a remarkably powerful tool to encourage movement towards sustainability in millions of companies worldwide.

And the good news is that this remains so despite the deep economic crisis that we are experiencing. The pages of this 2011 CDP 125 Iberia Report are evidence of this fact. It is encouraging to note that in this period of crisis that we are living, the low-carbon economy that we so desperately need is already being built. Let's continue on this path.



Víctor Viñuales Edo
CEO ECODES

PwC Commentary:

The advance of an integrated reporting model

The business drivers for long term success are understood to be increasingly non financial. Current methods of corporate reporting have led many stakeholders to question the relevance and reliability of annual financial reports as a basis for making economic decisions. Sustainability and climate change reports have suffered similar weaknesses, usually appearing disconnected from the organization's financial reports. A more integrated approach is needed.

The CDP initiative is advancing the consideration of climate change in the business and financial context. The 2011 Iberian 125 responses to the CDP Investor questionnaire show that organizations are incorporating climate change into their business strategies. Corporations are acknowledging the opportunities presented by a low carbon and sustainable growth environment and are reporting on the actions and decisions being made to realize them. As well as strategy CDP also asks companies to report on the integration of climate change into corporate risk management, opportunity development, remuneration, KPIs and internal and external reporting.

As the construct of a company's value shifts towards the intangible the business community is disclosing significantly more non-financial information that underpins how value is and will be created. Examples include low carbon products and services, motivation of employees and engagement with suppliers and other stakeholders.

This shift in thinking is occurring at a time when global reporting frameworks continue to place heavy emphasis on financial disclosure and performance. While financial systems were not designed to capture all of the non-financial inputs needed to reflect the contribution of business to society, there is a growing realization that a more progressive reporting model is needed. A few leading companies are beginning to challenge established boundaries of how performance is measured and reported. Together with major corporate reporting associations these companies have also begun developing a framework for the future integrated report.

Leading corporations are rethinking their business and reporting models, how they manage and drive sustainable, profitable growth and how they measure critical non-financial information. These new reporting models connect areas of corporate information; consider all risks whether economic, social or environmental; have an increased focus on the future and business strategy; consider the short, medium and long-term; respond to stakeholder interests; and consider the wider value chain. In turn, this shift in mindset appears to help corporations envision the future and build competitive advantage.

An important element in the new reporting model will be climate change. Reducing emissions can lead to innovation, identification of cost savings and development of commercial opportunity. Responding to CDP is a key step towards more mature corporate reporting and the consideration of climate change in the business context that is now the expectation of the capital markets.



María Luz Castilla

Director of Sustainability and Climate Change, PwC Spain

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Executive Summary

“The emerging policy environment around emissions and climate change is one of the defining drivers of Grupo Ferrovial’s business sectors over the coming decades. The number of climate related business opportunities and risks are increasing, and the time is ripe for the Ferrovial to determine actions to align its business units’ collective response to this challenge”

FERROVIAL

Towards a low carbon economic recovery

Although the impacts of the current economic crisis are primarily financial, we are also experiencing an environmental and social crisis. Financial institutions and companies in Spain, Portugal and the rest of the world are confronted with financial difficulties as well as increased competition for finite resources (energy, water, minerals, crops, etc.) and severe social and employment challenges.

The preventative and mitigation actions which companies are taking to address climate change are particularly relevant in these circumstances, making it easier for them to avoid risks, reduce the costs associated with energy and raw materials and develop new business and employment opportunities in the transition towards a low carbon economy.

By promoting corporate transparency on climate change policy and

practices, CDP seeks to encourage improvements in their management of climate change. This year CDP sent its annual questionnaire to the 125 largest listed companies in Spain and Portugal asking them to measure and report what climate change means for their business. The information provided by the 50 companies that responded to this questionnaire provides valuable insight into the business strategies companies are using to prepare for a resource constrained world and shows a shift in company strategy to prepare better for a low carbon economy and act on the business opportunities. The report assesses which are the leading companies in each sector and investors, governments, researchers and interest groups, can use these finding and the responses from companies to make better informed decision.

In addition to a global focus CDP also has a regional approach; in 2011 the responses from Spain and Portugal were combined to form the Iberia 125

Figure 3: Evolution of the sample (2008-2011)

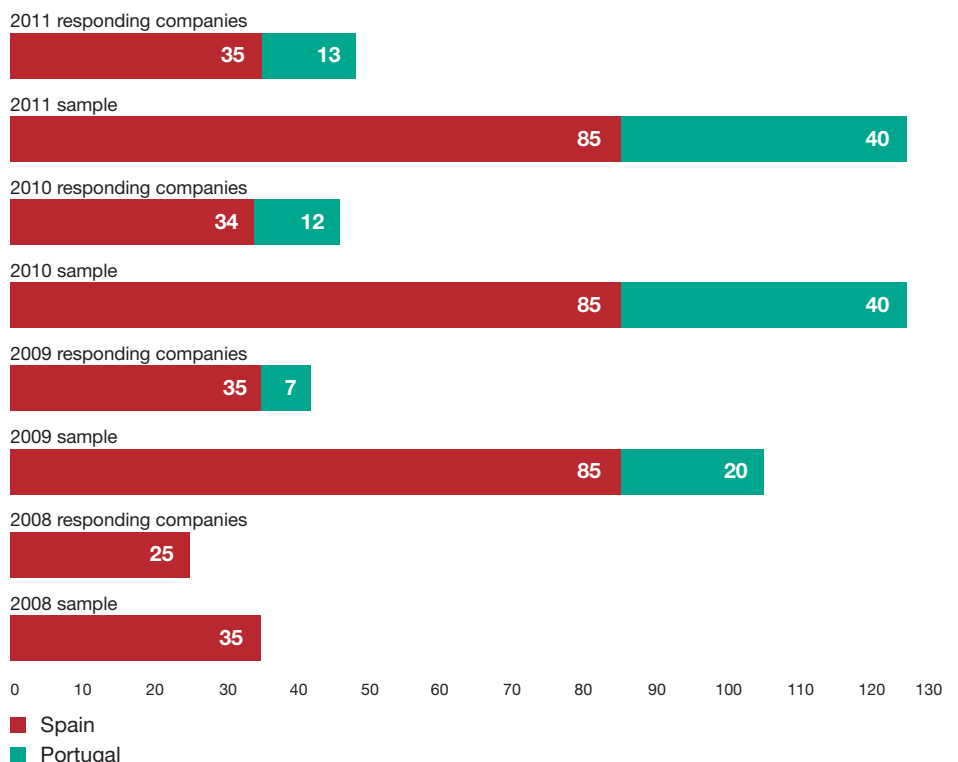
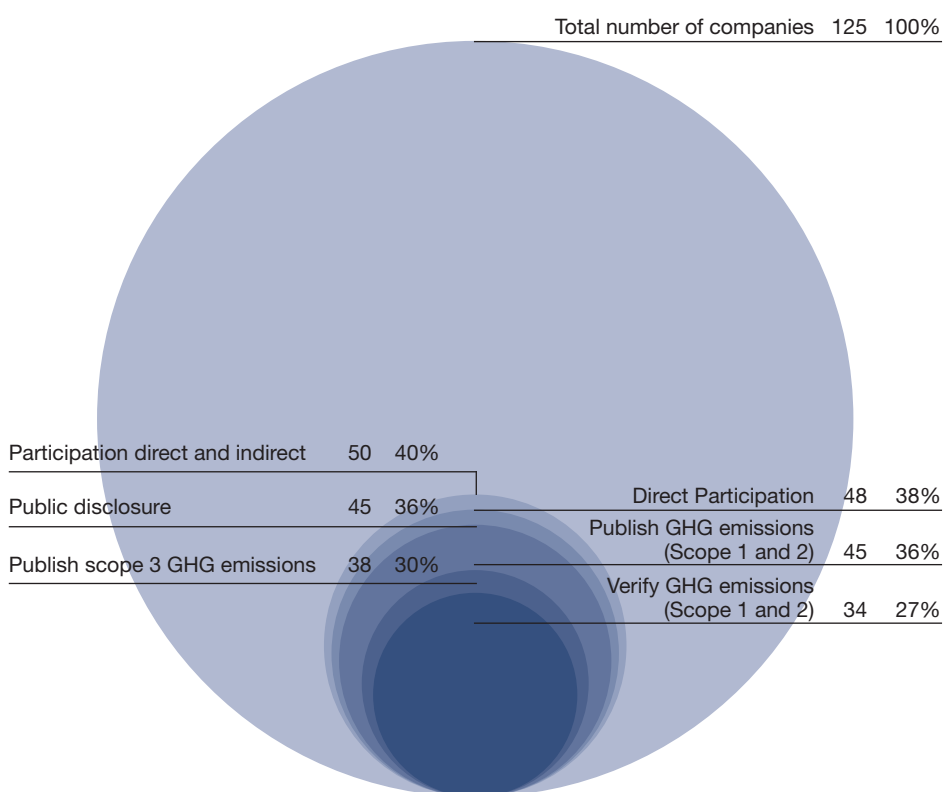


Figure 4: Key indicators in 2011 for Iberia 125

“ACCIONA’s divisions have expanded their project portfolios based on sustainable solutions, using renewable energies to generate electricity, biofuel production, businesses associated with sustainable transport and building efficiency”

ACCIONA

Report. The resulting change in the sample size makes it difficult to compare data with previous reports which only included responses from Spanish companies (see Figure 3 for number of participating companies since 2008). However, the larger sample enables more opportunities for sectoral analysis and may also stimulate more companies to follow the best practices of leading companies.

Figure 4 shows some of the most relevant indicators from the Iberian companies responding to CDP in 2011. The percentages in this figure are calculated from the total number of companies in the sample (125). Henceforth, and unless otherwise indicated, percentages refer to the total number of companies who responded directly to the questionnaire (48). The analysis in this report is based on direct Company responses to the CDP questionnaire, not including responses

from companies who responded indirectly, i.e. via their parent company. In the case of sectorial analysis the percentage may be referred to the number of companies in this sector that directly answered the questionnaire. Appendices I, II and III provide additional trends from participating Spanish and Portuguese companies as well as interesting comparisons with other regions.

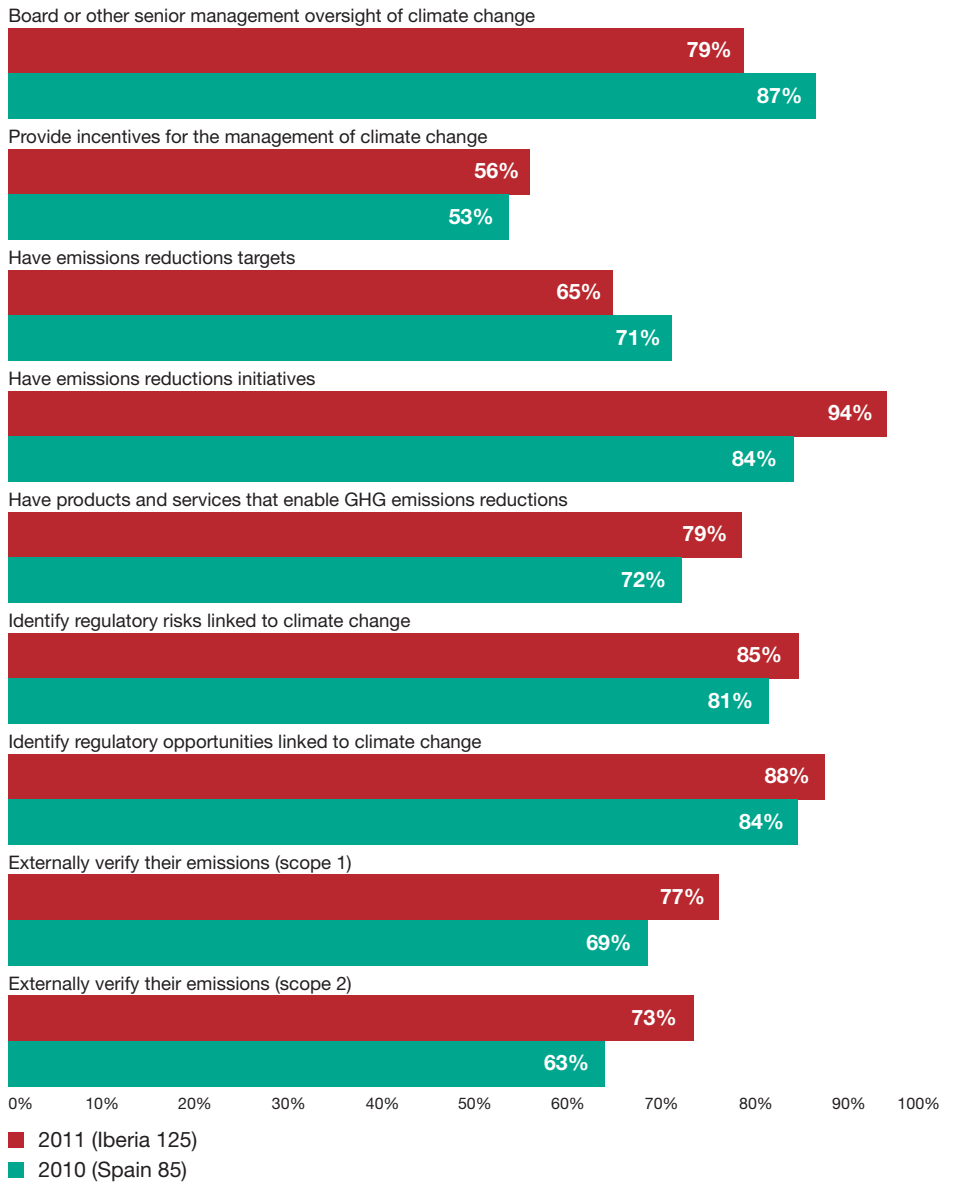
Key findings of CDP 2011 Iberia 125

- The level of participation of Spanish and Portuguese companies continues to grow. In 2011, despite the economic crisis, four new companies responded to the CDP questionnaire.
- The level of participation in some sectors is high. 100% of the companies in the Financials,

Industrials and the Utilities sector responded to the 2011 CDP questionnaire. Only two companies in these sectors decided to make their responses not publicly available.

- The carbon disclosure scores and the carbon performance bands reveal that some companies are reaching high levels of transparency and performance. 38% (18) of the responding companies achieved a disclosure score of greater than 70 and reached a carbon performance band of A, A- or B. While 13% (6) of the responding companies scored even higher and achieved a carbon disclosure score greater than 85 and a carbon performance band of A or A-.
- Although the level of emissions verification for the Iberia 125 sample stands out from the rest of regional samples, only 40% of companies that verify their Scope 1 and 2 emissions meet CDP’s new verification criteria.
- Companies in the Iberia 125 sample are taking steps towards a low carbon economy. 96% (46) of companies claim to have integrated climate change into their overall business strategy, and 79% (38) provide products and services that enable the reduction of carbon emissions. In addition, 25 (52%) of respondents reduced their absolute greenhouse gas emissions in the past year.

Figure 5: Key trends indicators¹



¹ The percentage of total of responding companies. Please note that between 2010 and 2011 the sample size increased from 85 to 125 companies.

Climate Change and renewable energy: a sectorial approach

Jorge C. Sicilia Serrano, Chief Economist, BBVA

Climate change is a long-term threat to the world, given the extraordinary acceleration of current global warming trends, which could have catastrophic consequences for millions of people. There is increasing evidence of the impact of high temperatures on food production, and rising sea level, which may end up flooding areas that are currently inhabited. Scientists attribute these observations to an increasing concentration of greenhouse gases (GHG) in the atmosphere.

Industrialization and human activities have been linked to the net increase in GHG emissions as a result of agricultural activities, fossil fuel burning and deforestation. The main contributor to the increase in this concentration is CO₂, annual emissions of which increased by 80% between 1970 and 2004, when they represented nearly 77% of greenhouse gas emissions from human activity.

Taking urgent action is becoming more and more pressing, as indicated by the latest study by the Intergovernmental Panel on Climate Change (IPCC), according to which, the downward trend in CO₂ emissions per unit of energy supplied, which took place between 1970 and the year 2000, turned positive after this date. According to this Agency of the United Nations, to keep the

increase in long-term average temperature between 2 and 2.4 °C, global carbon emissions must be reduced by at least 50% between the year 2000 and 2050, and it might have to be even more. The costs will be substantial: the International Energy Agency estimates that a 50% emissions reduction scenario will require an investment of \$46 trillion by 2050.

The role of governments in providing the multilateral strategic plans is essential, as a result of growing global energy demand expected by a booming middle class in emerging markets. The burning of fossil fuels for power generation is the main source of CO₂ emissions, and therefore, governments and private companies are focusing their efforts on increasing the share of renewable sources in electricity generation, preparing for a low carbon future. This commitment is beginning to be decided in both developed as well as emerging countries.

The future of renewable energy is promising. According to the special report on renewable energy sources by the IPCC from 2011, renewable energies have "huge potential in mitigating GHG emissions". Despite efforts by the United States and Europe to recover from the current financial

turmoil, global investment in renewable energy has continued to rise as China has entered the arena. The private sector and energy companies have not been exactly kept on the sidelines, aided by government incentives of subsidies and stimulus funds.

BBVA is strategically committed to providing funding and advice on renewable energy operations, a sector which it leads and where only in 2010 it financed and advised the installation of over 4,500 MW, increasing its investment by 36% compared to 2009.

In this process, BBVA has received the most prestigious recognition in the industry. In 2010 it was the top advisor in the Mergers and Acquisitions of Renewable Energy global ranking and received the Bloomberg New Energy Finance Award for reaching the top spot. In turn, the database specialist Dealogic again stresses the strength of BBVA in funding renewable energy projects in the first half of 2011. BBVA gets the second spot in this ranking, for its part in the funding major projects in Europe, Asia and the Americas. By type of renewable energy, according to the Infrastructure Journal, BBVA is in third place globally in wind energy and leads the rankings in solar and photovoltaic power.

The value of climate change for Telefónica: a business focus with an impact on results

Since 2007 we have been working on our strategy for climate change and energy efficiency. In 2010 the company was awarded 90 points out of 100 in the Carbon Disclosure Leadership Index (CDLI). The fact that we are the only Spanish company included in the CDLI Global 500 for the year is the source of considerable pride, but also makes us feel obliged to share our experience with the other companies involved in CDP Iberia 2011.

The first lesson learnt within the CDP focuses on the way we as companies need to manage **the risks and opportunities associated with climate change**. It is therefore vital to perform a comprehensive analysis in combination with the audit, operations and business departments. Two of the greatest risks we have identified are: obligations in terms of reporting and emissions reductions and the impact on our infrastructure of extreme climatic events in coastal areas. We have performed an economic assessment of these risks and have devised contingency plans to mitigate them.

In order to identify **business opportunities** for Telefónica, we work with the strategy and innovation departments and commercial channels so as to understand market trends in the short, medium and long terms. We

thus firmly believe that there is a business opportunity for us as we assist our clients in improving their energy efficiency. In 2010 the company launched the Green Customer Experience model, offering individual users a green mobile telephony experience from the point at which they consider purchasing a device, throughout and up to the end of its service life. This model also includes the development of green applications to encourage efficient habits among consumers.

Telefónica has also continued to work with the innovation departments to underpin the services already offered in the fields of smart buildings, remote presence, fleet management and virtual hosting, and has been involved in a number of electric car and smart city projects.

Another fundamental process in the efficient management of energy and carbon at Telefónica involves quantifying and managing energy and emissions in a responsible and structured manner. During 2010 we registered a substantial improvement in the processes to develop the Group's energy consumption and greenhouse gas (GHG) inventory, an essential factor in reaching the right decisions. We have adopted ISO 14064 and the GHG Protocol as our standards. In parallel, AENOR, the Spanish standardisation and verification

body, performed a specialist verification of all our operations.

Over the course of 2010 we developed 44 energy efficiency projects globally across the network, reducing our energy expenditure by more than 7 million euros. These initiatives also helped Telefónica reach the halfway stage in achieving the goal for 2015 announced in 2008 of a 30% reduction in network electrical consumption by equivalent access.

At Telefónica we place great importance on **transparency** in the field of climate change. Telefónica includes information about its strategy and achievements in this regard in the Annual Report delivered to shareholders, and in its Annual Sustainability Report. It also has in place 2.0 channels for information and debate about energy efficiency, green services, indicator measurements, etc. Likewise, as part of its social awareness-raising initiatives, it worked with the ITU and GeSI on publication of the "Use of ICTs to Address Climate Change", launched at the Cancun Climate Change Summit.

Telefónica has continued these initiatives in 2011, courtesy of its Climate Change and Energy Efficiency Office, with a strategy based on the management of the risks and opportunities associated with climate change and energy.



Political context of climate change for businesses

“Mitigating this risk at Repsol is first about reducing our GHG emissions and secondly about transparency and reporting to ensure that stakeholders are able to judge our efforts in accordance with their expectations. With respect to reductions, the Company has a GHG reduction objective that is well on its way to being met and we are undertaking significant efforts in energy efficiency that will allow us to adopt more ambitious targets for the future”

REPSOL

The politics of climate change in Spain

Although it has made significant progress in reducing its emissions Spain is still short of meeting its Kyoto target for 2012. Spain’s greenhouse gas (GHG) emissions in 2010 were about 25% higher than the 1990 base year and although lower than in 2009 (when they were 30% above target) they are substantially short of Spain’s Kyoto objective, which is to limit the increase to 15% of the 1990 levels for the period between 2008 and 2012. Spain is the sixth largest emitter in the EU-27, roughly in line with the overall size of its population and its economy, and in 2009 accounted for about 8% of total EU-27 GHG emissions.

Spain’s GHG emissions performance, both good and bad, has broadly followed the ups and downs of the country’s economy. Between 1990 and 2008, emissions increased from road transport, electricity and heat production, construction and fuel use from both industry and households at a time when the economy was growing fast and house building expanded rapidly during the second decade of the period. Since 2009, however, GHG emissions have decreased, with economic activity declining during a deep recession and only staging a feeble recovery afterwards. Moreover, Spain’s population which previously expanded rapidly due to immigration during the good economic years declined in 2011 which has also

contributed to reductions in GHG emissions.

However, increased use of renewable energy and a decrease in the use of coal have also contributed to the reductions in GHG emissions. Spain has made significant investments in both energy efficiency and renewable energy. In 2010, renewable energy, including wind power and hydroelectricity, exceeded 10% of Spain’s primary energy supply and generated 32% of the nation’s electricity. Both the Renewable Energy Plan 2005–2010 (PER) and the Spanish Strategy for Energy Savings and Efficiency 2004–2012 (“E4”) have contributed substantially to the objectives of Spain’s climate change policy.

Spain has a target for renewables to deliver 40% of the electricity by 2020 and in the latest Renewable Energy Plan 2011–2020 (PER) renewables are estimated to provide for 22.7% of the gross final energy consumption by 2020.

Since 2004 Spain’s government emphasised the importance of alternative energy for the Spanish economy, especially for job creation. The Spanish government introduced a number of laws and policies covering environmental issues. Climate change policy currently falls under the Estrategia Española de Cambio Climático y Energía Limpia (Spanish Climate Change and Clean Energy Strategy), which covers the period to 2020 and includes 198 measures and 75 indicators on

mitigating and adapting to climate change.

Its six strategies to reduce greenhouse gases are: sustainable energy; sustainable transport; sustainable construction; management of waste and animal waste; forestry and land use policy; and innovation. Spain also introduced the Sustainable Economy Law in 2011 which will contribute to regulations aimed at creating a low carbon economy. And the Joint Commission Study on Climate Change recently recommended climate change legislation which includes incorporating carbon emissions in state budgets, and developing a tax system that helps to internalize the costs associated with climate change.

The EU ETS and the use of Kyoto mechanisms also play an important role in Spain's ability to meet its Kyoto Protocol target. The second National Allocation Plan (2008–2012), has more stringent criteria for allowances allocation than the first plan and resulted in greater annual emission reductions than the first trading period. Spain like the entire international community is looking towards the renewal of the emission reduction commitments at the end of the compliance period of the Kyoto Protocol in 2012 and the outcomes of the COP17 in Durban.

The effects of the economic crisis persuaded the government to perform two environmental policy U-turns that worried investors in one case and environmentalists in the other.

Investors in solar photovoltaic energy were concerned when the government, eager to cut its subsidy bill as a way of reducing the public sector budget deficit, decided in December 2010 to make retroactive

cuts in guaranteed subsidies for the sector. Environmentalists and some Spanish energy companies, meanwhile, protested when the government decided to double its aid to the Spanish coal mining sector in the coming years, giving coal power preferential access to the wholesale electricity market and therefore disadvantaging suppliers from other sources, including renewables. Gas Natural Fenosa, Iberdrola and Endesa began legal action against the European Commission's decision to approve the Spanish plan.

The Organisation for Economic Cooperation and Development (OECD) launched its Green Growth Strategy in May 2011 which is in line with Spain's green job policy. It recommended that Spain should do more to reduce GHG emissions and improve energy security through reforming energy prices. Moreover, it stated that "Abolishing these subsidies would reduce the overall cost of stabilising GHG concentrations and provide stronger incentives for the transition to new renewable-energy sources. Spain still subsidizes domestic coal production for power generation, although less heavily than in the past. Petrol and diesel prices in Spain are amongst the lowest in OECD Member countries, as are its tax rates on vehicle fuels. An increase in fuel taxes, and abolition of the differentiation between petrol and diesel, would also provide greater incentives for reducing emissions and using more fuel-efficient vehicles, while also contributing to fiscal consolidation on the revenue side."

With Spanish National elections completed in November 2011 the issue is whether policies will continue to foster the path towards a low carbon economy and a post Kyoto framework.

The politics of climate change in Portugal

By Euronatura- Center for Environmental Law and Sustainable Development

Overview of National and International Regulation for Portugal

Under the Kyoto Protocol and the European Union pledges, Portugal committed itself not to increase its GHG emissions by more than 27% by 2012, using emissions registered in 1990 as a reference. The Kyoto Protocol GHG emissions monitoring mechanisms and the implementation measures have a key role in the fulfilment of the commitments agreed in the past and also in new reduction commitments for 2020. The following main mechanisms have been put in place in Portugal:

- The "National Program for Climate Change", which includes a set of policies and GHG public sector mitigation measures.
- The "National Plan for the Allocation of GHG Emissions Licenses", which imposes caps on industrial sites within national borders.
- The "Portuguese Carbon Fund", a government financial instrument to acquire Kyoto Protocol emission credits in order to ensure Portugal fulfils its Protocol commitments; it also invests in domestic emissions reduction projects.

The government information and monitoring systems predict that the country will meet its Kyoto targets. It is estimated that, in the 2008-2012 commitment period of the Kyoto Protocol, Portugal will be 1% below the agreed targets. That is equivalent to emitting 4,78Mt of CO₂e less than the set target. This forecast stems from the public policies and mitigation measures proposed in the

“National Program for Climate Change”. In particular, it is due to the rise of renewable energy production and to an improvement in energy efficiency. However, it should be taken into account that the outcomes of this program are influenced by Portuguese economy’s decline during recent years. Also the “Program for Energy Efficiency in Buildings” has had remarkable results.

Beyond the 2012 Kyoto horizon, Portugal presently envisages the EU “Climate and Energy Package” as the basis on which to build its climate policy. The current Government Program states that Portugal should accomplish substantial improvements in energy efficiency, for instance, a 25% reduction in private energy consumption and a 30% decrease in public energy consumption by 2020. In addition, the current Government agrees that the fossil fuel dependency has to decrease. At the same time, the Executive’s ambition is that “in the medium-term, the country should reach the lowest energy intensity in the EU”.

How climate change policy affects companies’ performance

In the last decade, Portuguese companies - following the path of EU States - have become increasingly concerned about climate issues. As a consequence, there has been a transition to production processes less exposed to energy prices. However, contrary to the clout that investors and shareholders have in decision-making, customers and the public opinion still lack recognizable power in pressing companies to join and promote a low-carbon economy.

There is a significant group of companies that already have voluntarily incorporated emissions management in their strategies. Some of those companies have not

yet specified a clear objective regarding GHG emissions reductions. Nevertheless, companies in general have continuously invested in energy efficiency as well as in renewable energy production. Therefore, Portuguese companies have made some progress, paving the way for an effective management of climate change.

Companies that are not part of the EU ETS and listed in the stock market do not specify political targets and commitments when communicating their climate change strategies. When defining GHG emission targets, they base it on internal analysis and unilateral projections that assess companies’ abilities to decrease operational costs. In sum, the ambition behind the objectives stems only from forces within the company. Another common feature is that the formulation of energy consumption cuts and GHG emissions strategy only targets a fraction of the companies’ activity. Companies which are part of the EU ETS present targets according to regulations. Often, these companies’ inventories and mandatory objectives represent their whole climate change management strategy.

Pre-empting and adapting to future national regulation

Only 46 % (6) of the Portuguese responding companies have voluntary and strategic goals to reduce their carbon footprint or overall energy consumption. The lack of more proactive and preventive measures being adopted may indicate that decision-makers within companies do not expect further regulation in the short-term.

92% (12) of the Portuguese companies that answered the CDP 2011 questionnaire are implementing energy efficiency plans and carbon footprint reduction strategies. It is

“CGD’s strategic programme “Caixa Carbono Zero”, in place since 2007, defines the Bank’s climate strategy and promotes specific actions on the following areas: emissions accounting and reduction; carbon offsetting; market opportunities and risks and public awareness. Opportunities and risks associated with climate change perceived by CGD have so far been part of an overall approach to governance and compliance”

CAIXA GERAL DE DEPOSITOS

“We believe that our business and geographic diversification along with our active lobbying and R&D&I programs is allowing us to significantly benefit from any intensification of regulations”

ABENGOA

these companies that are taking the lead in attempting to assess the economic value of resources and developing a sustainable and viable economic growth for business. This shows, on the one hand, that a systemic change in business models is already taking place and, on the other hand, that carbon measurement and financial issues are intertwined in the decision-making process of companies leading the way in sustainability.

When business planning – whether or not it comes under pressure from regulations – takes into account the economic value of the use of resources and their present and future scarcity, it reflects a greater understanding of risks the company faces. Furthermore, there are also opportunities for companies that understand the way markets are affected by environmental issues and the associated political climate; determining these opportunities is a driver of innovation that is already leading companies to a reassessment of the climate change implications of their products and services across the value chain, resulting in new green sub-brands and products and access to markets that otherwise would not have been tapped.

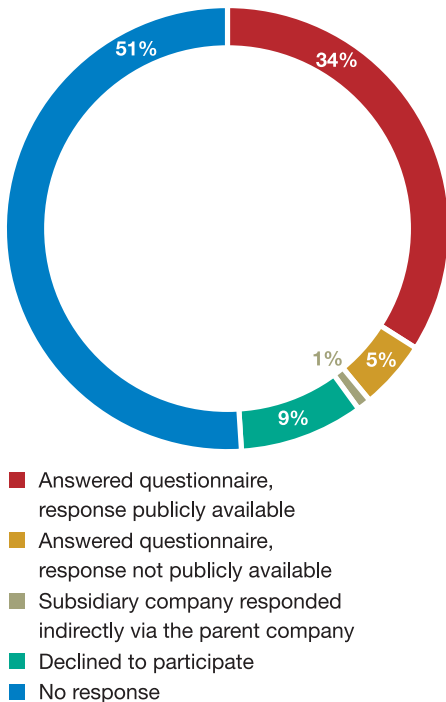
Capital and investment are also needed in order to innovate and to develop new technologies. At a moment when capital is a scarce resource in Europe, investors, asset owners and asset managers are responsible for rewarding businesses that have long-term strategic thinking. In the Portuguese context, socially responsible investment is

limited. Therefore, the challenge remains for Portugal to create conditions so that stakeholders can create a new group of like-minded people and institutions pushing for the development of climate change policy. That in itself is an opportunity to the financial sector, comprising investors and banks, since they would be able to develop products to fund the investments that leading companies need to undertake.

In the near future, it is expected that businesses in Portugal will be faced by three regulatory and political instruments. Currently, they are in a development stage and are interconnected in a hierarchical manner: the “Low Carbon Road Map”, the “National Program for Climate Change 2013-2020” and the “Low Carbon Sector Plans”. These policies constitute the first Portuguese climate change regulatory framework that some companies listed in the stock market, and not part of the EU ETS, will need to adjust to. These kinds of governmental policies are urgently needed in a matter such as climate change. Governments must deal with long-term issues by foreseeing the long-term risks and opportunities of current measures in a manner and on a timescale that company planners are not accustomed to. In addition, these policies provide a platform for building confidence in moving towards a low carbon economy that can influence companies, investors and society as a whole. These regulations could impact consumer patterns and may make climate change more of a priority issue amongst voters.

Highlights in 2011

Figure 6: Responses to the CDP questionnaire in the Iberia 125 sample



The business response to climate change

Since 2008, the largest Spanish and Portuguese companies have regularly participated in CDP. The fact that in the past two years the 40% response rate has only risen modestly (4 new companies respond in 2011) reflects the difficulty smaller companies face in developing practices related to climate change measurement, management and communication. Yet management practices among responding companies continues to improve year on year indicating that they are being extended to other companies through their supply chain, through business competition and the reputational challenge posed by climate change.

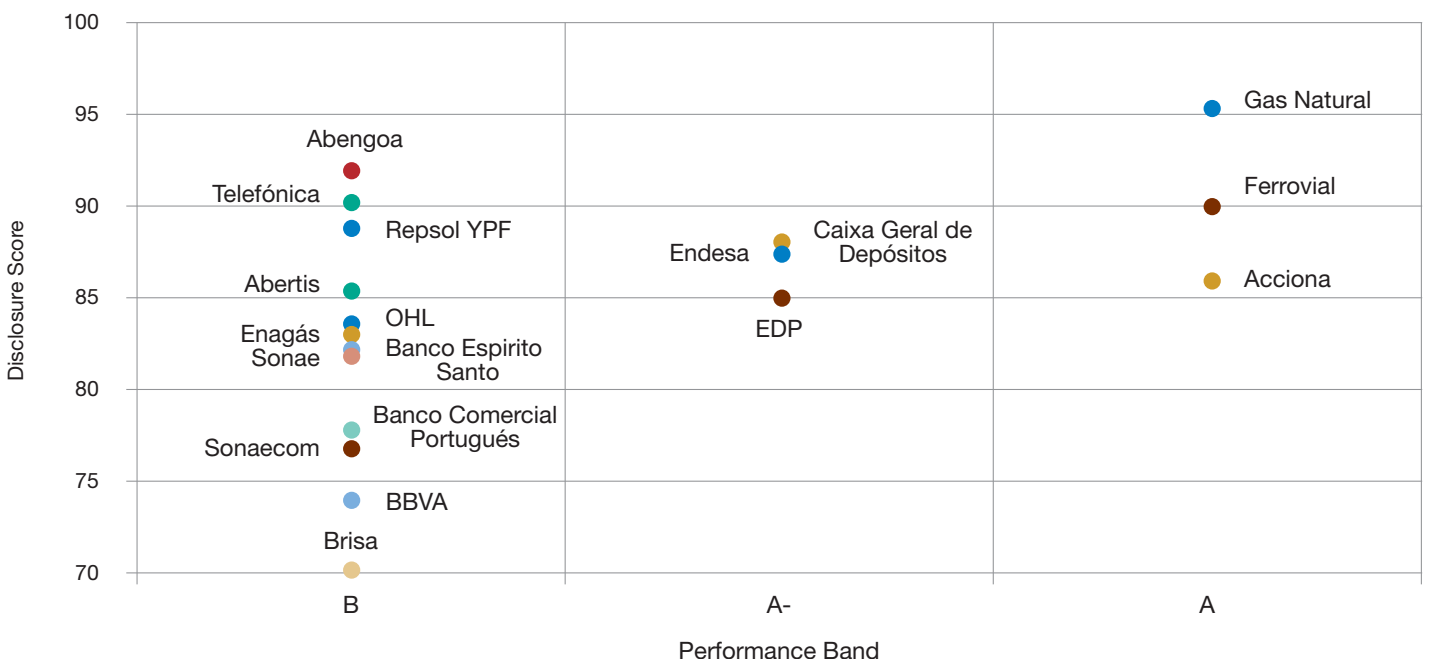
Moreover, there have been improvements in the level of transparency from responding companies. In the Iberia 125 2011 Report, only 5% (6 of 125) of companies submitted non-public responses (See Figure 6 for details on the response rate and Appendix III for the status of responses from each

of the companies over time). Of the 48 direct responses to the CDP questionnaire in 2011, 73% (35) came from Spanish companies and 27% (13) from Portuguese companies. Two additional Portuguese companies answered the questionnaire indirectly via their parent companies.

In contrast, 60% (75) of the companies in the Iberia 125 sample did not respond to the questionnaire, neither directly or via their parent companies. Increasing the number of responding companies within the sample still poses challenges especially in for small companies.

In earlier CDP reports companies were only scored on the quality and completeness of their disclosure but in 2009 performance scoring was piloted and since 2010 Spanish and Portuguese companies with sufficient disclosure (minimum disclosure score of 50) are also scored on performance. Figure 7 illustrates those companies that score in the A and A- band on performance, are

Figure 7: Carbon Disclosure scores 70 or above vs. carbon performance bands of A, A-, B



also leading in terms of the quality and completeness of their response with more than 85 points achieved on carbon disclosure. A total of 18 Spanish and Portuguese companies (38%) have achieved a disclosure score greater than 70 and fall within the A, A- or B performance band. Of these companies, 6 have a disclosure score of 85 and above and are in the performance band of A or A-. There is therefore an opportunity in the next few years for more companies that are leading in the quality and completeness of their disclosure to also improve in their performance, in other words there is a link between disclosure and performance.

Business strategy and Board oversight

Undoubtedly, the key for companies to become leaders in climate change management is the integration of this issue into business strategy.

According to responses to the CDP questionnaire, 96% (46) of the companies have taken this step by linking their climate change strategy with their overall business strategy. This is a higher percentage than in the Global 500 (90%) or Europe 300 (92%) sample. Similarly high is the percentage of companies with the highest level of responsibility for climate change at Board or senior management level in the company, which is the case for 90% (43) of the companies. While this fact underlines the importance given to climate change in major Spanish and Portuguese companies, only a comparatively low number of companies have adopted incentives and specific management systems. Only 56% (27) of the companies have economic incentives for achieving climate change related goals compared to 72% of companies in the Global 500 sample. Moreover, 13% (6) of the companies which responded that

Figure 8: Key indicators in the corporate governance of climate change

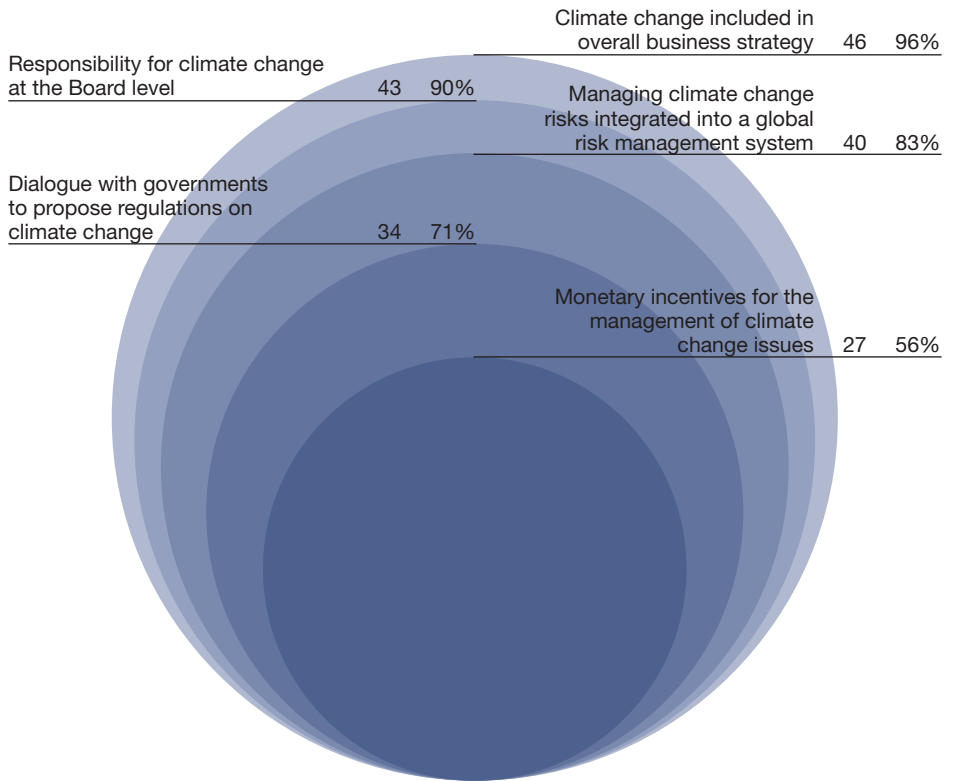
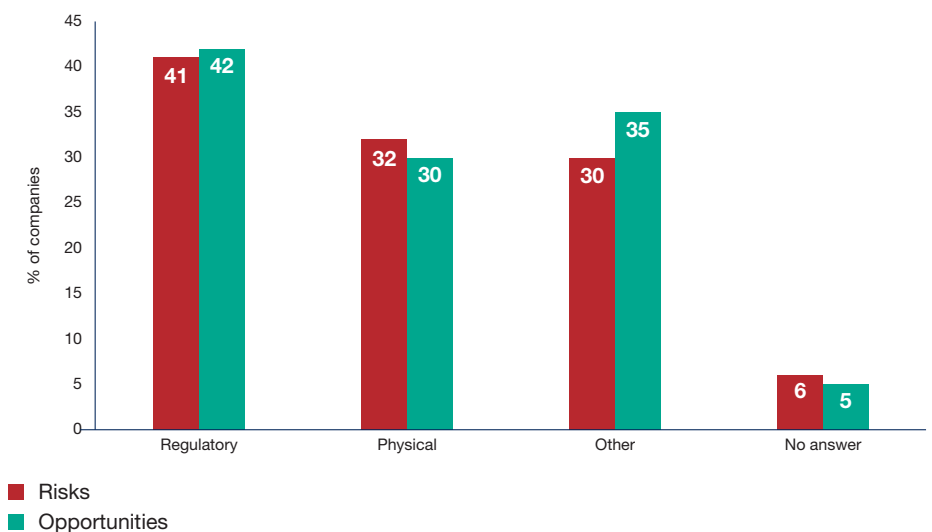


Figure 9: Companies that identify risks and opportunities associated with climate change



climate change is integrated into their business strategy do not have risk management systems in place to assess the risks associated with climate change. Companies responses in relation to incentives and specific management systems suggests that there is room for improvement in the management of climate change, especially since the majority of the responding companies are tackling the issue of climate change the Board level.

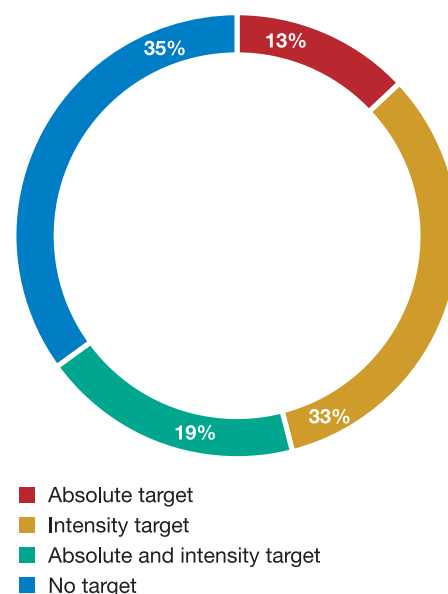
The percentage of responding companies that have identified risks and opportunities associated with climate change has grown slightly since 2010. 85% (41) of responding companies have identified at least one type of risk associated with climate change compared to 81% in the previous year². Similarly, the percentage of firms that identify opportunities has increased from 84% to 88% a total of 42 companies in 2011.

This shows that there is an increased focus on climate change as a factor that can influence the future business and performance of companies.

Emissions reduction targets

The percentage of responding firms in the Iberia 125 sample that have emissions reduction targets is 65% (31), this is one of the few areas of management in which there is a slight decrease from the previous year. In 2010, 71% (24) of responding companies in the CDP Spain 85 2010 Report had emissions reduction targets. The decline is explained by the difference in practices between the Spanish and Portuguese companies (71% have reduction targets versus 46% respectively).

Figure 10: Types of emission reduction targets



Among the responding companies that have emissions reduction targets there is great diversity both in the type of targets and the scale and timeframe. Of particular interest are the absolute reduction targets which have been established by 32% (15) of the responding companies. The establishment of absolute emissions reduction targets is a good means for evaluating the actual outcome from the management of emissions by the company (compared to intensity targets like emissions per unit of sales or employee, which can vary without having a real reduction in emissions). Absolute targets also make it easier for comparison between companies' relative efforts in global reduction targets.

Table 1 shows those responding companies that have adopted targets for reducing a significant portion of their Scope 1 and 2 emissions. To facilitate a comparison the table

presents annual targets that would result from a multi-objective linear distribution in each year of the reporting period³.

Table 1: Magnitude of the absolute annual targets for reducing emissions⁴

Company	Annual objective for absolute emissions reduction
Gas Natural	7%
NH Hoteles	6%
Bankinter	5%
R.E.E.	3%
Acciona	3%
Brisa	2%
Portugal Telecom	2%
Enagás	1%
Repsol YPF	1%

A second calculation allows us to estimate the total reduction of emissions (t CO_{2e}), which is translated into absolute reduction targets for the CDP 2011 questionnaire as displayed in Table 2. Again the assumption is that

Table 2: Quantification of absolute targets for reducing emissions

Company	Estimated reduction in CDP2011 (t CO _{2e})
Gas Natural	2,506,747
Repsol YPF	1,561,790
Ferrovial	1,411,787
Acciona	27,861
Portugal Telecom	7,156
NH Hoteles	2,711
Enagás	2,423
R.E.E.	1,414
Brisa	476
Bankinter	466
Iberdrola	217

² Data from the Spain 85 sample in 2010.

³ The objectives have been scaled down and do not apply to total emissions but rather to only a percentage of emissions. For example, an emissions reduction target of 15% over three years that applies to 80% of total emissions would be equivalent to an absolute reduction of 4%.

⁴ This table does not include companies that have an absolute emissions reduction target but that have not quantified the percentage of their applied Scope 1 or 2 emissions that this target refers to. Ferrovial and Iberdrola, for example, have absolute targets for some of their business units. Nevertheless the data provided by these two companies allows for an estimation of the total amount of emission reductions and have therefore been included in Table 2.

multi-year targets are distributed linearly year on year. In practice this is rarely the case since many investments and activities provide the results only at the end of the period. However, for comparative purposes and to provide an idea of the magnitude of the objectives, the approach is valid.

Over 65% (31) of the responding companies have one or more emissions reduction target related to intensity (turnover per unit of product, employee, etc). These objectives are sometimes as relevant as absolute targets. But in general meeting intensity targets does not necessarily mean an overall reduction in total emissions.

Please refer to Table 3 in next chapter for information on emissions reduction progress of the responding companies.

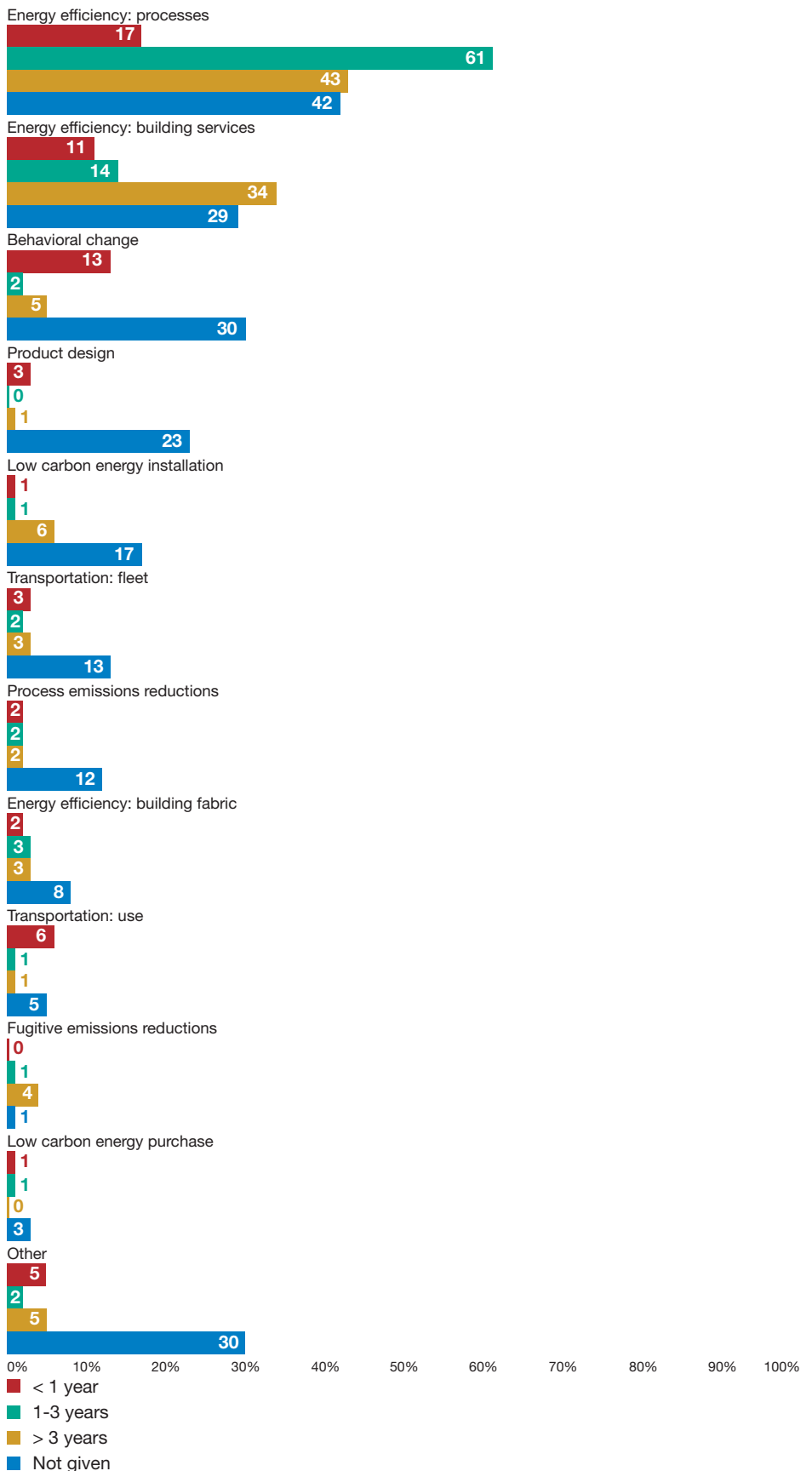
Emissions reduction initiatives

The next logical step in the management of emissions is the adoption of plans and mitigation measures. 94% (45) of the responding companies have activities to reduce emissions, while 79% (38) have developed products and/or services that enable customers to reduce emissions. In both cases there has been a level of progress from the previous year (see Figure 5). Both emissions reduction initiatives and new business lines are reaching a point of maturity and are implemented by most companies.

As for the effectiveness of emissions reduction activities, 56% (27) of the responding companies claim to have achieved an average reduction of 12% of their emissions through these initiatives.

We can see in Figure 11 that the most commonly identified type of

Figure 11: Number of active emission reduction initiatives by period of return on investments



activity to reduce emissions by responding companies is to improve energy efficiency in processes, with a total of 163 initiatives underway. Figure 11 also highlights the number of energy efficiency initiatives which have a payback period between one and three years, 37% or a total of 61 initiatives have a short-term economic justification. The second highest number of emissions reduction initiatives implemented are energy efficiency improvements in the management of buildings with a total of 88 active initiatives. The payback period for these activities is somewhat longer, only 16% (14) of the initiatives have a return period of three years, while 39% (34) of them have a payback period of three years or longer. Other initiatives in emissions reductions do not have a clear payback period. From these results we can deduce that among the responding companies in the Iberia 125 sample the most common investments are in emissions reduction activities with short-term financial returns. This differs from the Global 500 results which indicate that companies in that sample are more willing to invest in activities with a medium to long term payback. However, there are many initiatives, over 230, listed by the responding companies in the Iberia 125 sample which did not include an estimated payback period, thus the assumption can be made that some companies are implementing emission reduction initiatives for reasons other than the direct financial returns.

Also noteworthy are initiatives related to behavioural change (50 activities) which is the third most popular type of initiative carried out by the Iberia 125. Initiatives centring on behavioural change have the highest proportion of activities with a return period of less than one year (43% of the actions pay for themselves in this period).

Aside from the financial return of emissions reductions initiatives, companies can generate financial return from developing new business in the low carbon solutions sector. Up to 79% (38) of the responding companies already offer products or services helping third parties to reduce their emissions.

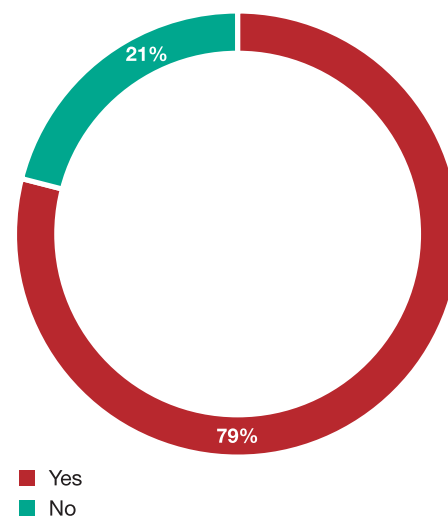
Emissions reductions

A total of 39 (81%) companies in the Iberia 125 sample provide consistent and comparable data for Scope 1 and 2 emissions and their emissions from the previous year. Table 3 shows these companies together with the volume of emissions and the percentage change from the previous year. Based on this data, the total emissions from these companies for the past year is 166,307,505 tCO₂e, and a reduction of 38% of emissions has been achieved by these companies compared to the previous year. It should be noted that this calculation includes Scope 2 emissions so there could be double counting of the emissions. However, it is a valid estimate that was made possible due to the progress of companies in providing more detailed responses to the CDP questionnaire.

As in previous years, Utilities are responsible for a greater amount of emissions. Four of the five largest Iberia 125 companies in terms of quantity of emissions are from this sector. This sector has also achieved the largest emissions reductions over the previous year, in total 46%. It is also important to consider that Utilities have a greater margin of emission reductions than other sectors.

When handling these figures one must bear in mind that not all companies have yet established emissions inventory systems to allow for comparison, especially those companies reporting their emissions for the first time.

Figure 12: Percentage of companies in the Iberia 125 sample offering products or services helping third parties to reduce emissions



“A 25% reduction was achieved by 2010, due to the reduction of emissions in electricity generation, mainly in the coal-fired thermal power plants in Spain and the divestiture of combined cycles in Mexico”

GAS NATURAL

Table 3: Volume of emissions reported and trends compared to the previous year

	Total GHG emissions (Scope 1 + 2) (t CO ₂ e)	Difference from previous year
Iberdrola	46,171,669	-6%
Endesa	39,291,885	-15%
Repsol YPF	25,438,767	-5%
Gas Natural	20,483,677	-31%
EDP	15,771,391	-26%
Iberia	5,998,746	5%
Abengoa	3,025,730	73%
ACS	2,010,888	2%
Ferrovial	1,842,385	-4%
Telefónica	1,814,799	6%
Acciona	1,063,070	-5%
Banco Santander	453,442	4%
OHL	423,835	-12%
Inditex	332,472	-1%
BBVA	329,870	-39%
Enagás	329,456	14%
REN	214,536	-13%
Sonae	199,369	-25%
Abertis	187,858	-9%
NH Hoteles	161,991	-7%
Portugal Telecom	139,377	-10%
Sol Meliá	126,780	8%
Banco Comercial Português	80,399	-10%
R.E.E.	71,114	-8%
Grifols	54,119	1%
Caixa Geral de Depositos	51,073	-2%
Gamesa	50,709	8%
Indra A	33,655	12%
Sonaecom	30,552	-27%
Banesto	21,186	-2%
Banco Espírito Santo	19,282	-24%
Brisa	18,443	-23%
Banco Sabadell	17,746	-17%
Mapfre	17,518	-44%
Banif	13,020	18%
Bankinter	7,594	-3%
Telecinco	6,574	2%
Banco Popular Español	2,168	0%
Criteria Caixa Corp	360	-5%

External verification of emissions inventories

CDP is committed to increasing the level of verification of emissions disclosures in order to improve the quality of the information submitted by companies globally. In turn, this will build trust in carbon reporting and lead to an increase in the use of the data in analysis and decision

making. Key drivers for verification include the increasing market demand from investors, customers, regulators, non-governmental organizations and other stakeholders for assured and reliable climate data.

Improved internal management processes that can be harnessed for competitive advantage is a key benefit of verification. In order to support this

drive, CDP rewards verification highly in both disclosure and performance scoring in 2011 and it is one of the criteria for entry into the CPLI.

Verification levels in 2011:

In 2011, a number of criteria were introduced to determine what is accepted as verification within CDP's scoring methodology. It requires that a verification statement:

1. Is related to the relevant emission scope
2. Clearly states the type of verification that has been given and the standard used
3. Covers the current reporting year
4. Is undertaken by an independent third party.

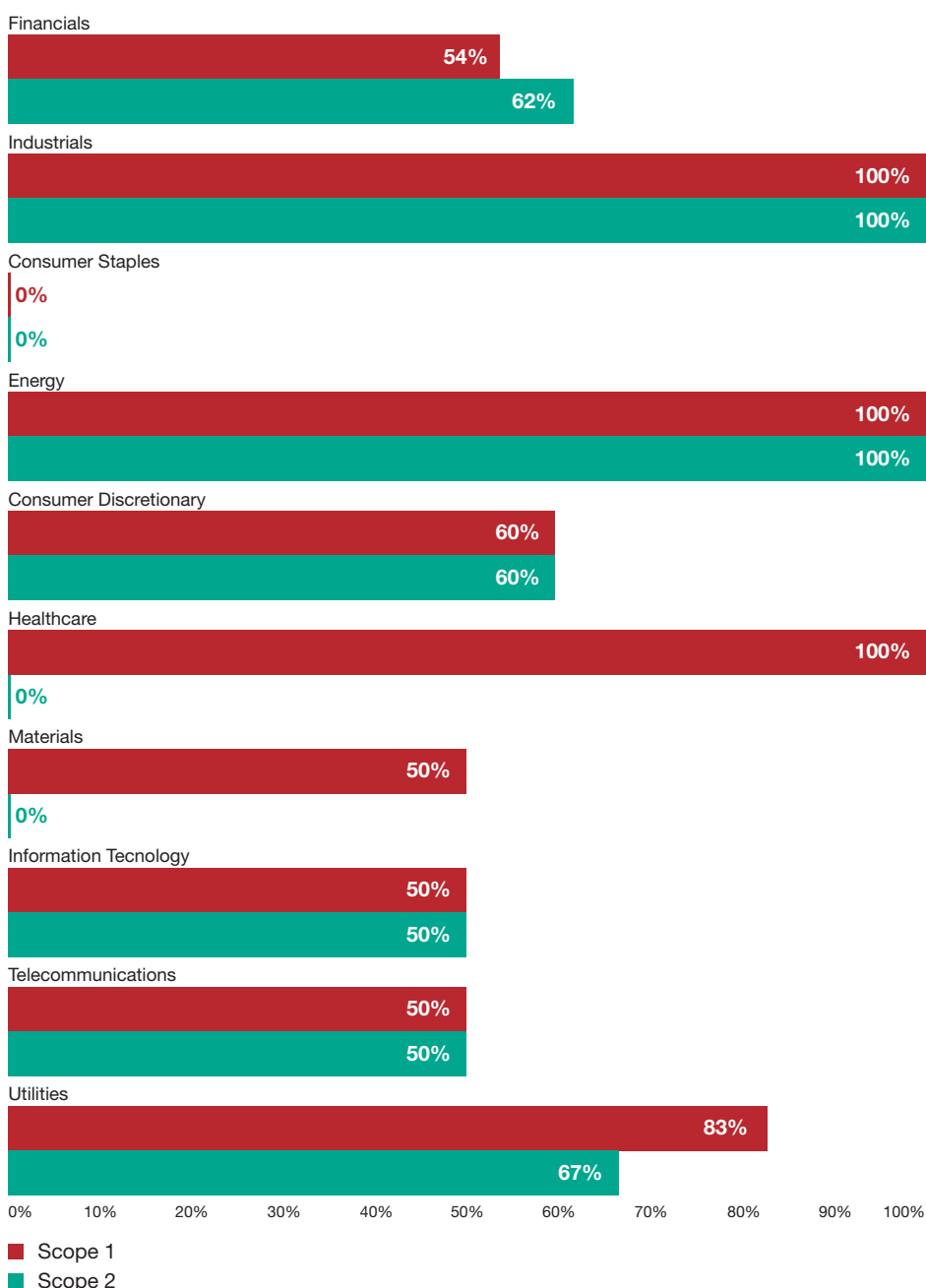
Verification of emissions has decreased in the year on year analysis in this report because CDP has strengthened its criteria to reflect the importance of verification. Whilst 71% (34) of responding companies stated that they had gained or were in the process of gaining verification of Scope 1 or 2 emissions (an apparent increase of 2% compared with 2010), only 40% (19) met all criteria noted above for Scope 1 or 2 emissions, resulting in an overall decrease of 29%. CDP sees this higher standard as a key strategic priority to enhance the quality and reliability of the data reported by companies for the use of investors and consumers, both now and in the future. The sector breakdown of companies verifying their Scope 1 and 2 emissions is shown in Figure 13.

The number of companies obtaining verification is similar for both Scope 1 and Scope 2 emissions for the majority of sectors. Only in sectors with very low number of companies differences in percentage are noticeable.

What is CDP doing to support reporting companies?

For 2012, CDP is providing further clarity on what constitutes an

Figure 13: Percentage of companies in each sector with complete verification for at least a proportion of their emissions



acceptable verification process, which will be communicated as part of the questionnaire consultation process in September 2011. Looking further ahead, CDP has launched a verification white paper and consultation on a verification roadmap (2013-2018) aiming to encourage more companies to verify their climate data. Visit <https://www.cdproject.net/verification> to find out more.

2011 Leaders

“In Portugal EDP has created an ESCO company –EDP Serviços– that provides energy efficiency services. In 2010, EDP has developed 13 types of services that reduce energy consumption and CO₂ emissions. The expected energy consumption reduction of the 2010 projects are approximately one thousand Gigawatt-hour and the emissions avoided are approximately 380,000 CO₂ Ton”

EDP

Introduction to the Carbon Disclosure Leadership Index (CDLI) and the Carbon Performance Leadership Index (CPLI)

Each year company responses are reviewed, analyzed and scored for the quality of disclosure and performance on actions taken to mitigate climate change. This results in a disclosure score and, where sufficient disclosure exists, a performance score.

Iberia 125 companies have been scored by PwC.

Disclosure scores

- Disclosure scores are an assessment of the quality and completeness of a company's response; they are not a measure of a company's performance in relation to climate change management
- Scores are plotted over a 100-point normalized scale
- Companies are assessed based on their level of disclosure of carbon emissions measurement techniques and subsequent public disclosure
- Companies with the highest disclosure scores are listed in the CDLI.

Performance bands

- Where a company's disclosure score is 50 or more, its performance in mitigating carbon emissions is assessed and ranked in a performance band
- For 2011 there are six performance bands (there were four bands in 2010)
- Companies with the highest performance bands that meet additional 'CPLI' criteria are listed in the CPLI.

Analysis of the CDLI and CPLI provides insights into the characteristics and common trends among the leading companies on carbon disclosure, and highlights good practices in reporting, governance, risk management, emissions reductions and other areas. Interrelations between the CDLI and CPLI companies are analyzed to determine if those companies with better data use it within the business to drive value adding activities.

The Carbon Disclosure Leadership Index 2011

What does a disclosure score represent?

Generally, companies scoring within a particular range exhibit similar levels of commitment to, and experience of, disclosure. The indicative description of each level is provided below for guidance only; investors should read individual company responses to understand the context for each business.

How is the disclosure score determined?

In determining the disclosure score for each company, we assess the following:

- The level of understanding and disclosure of company-specific exposure to climate-related risks and opportunities.
- The level of strategic focus and commitment to understanding the business issues related to climate change, emanating from the top of the organization.
- The extent to which a company has measured its carbon emissions.
- The extent of the internal data management practices for understanding GHG emissions, including energy use.
- The frequency and relevance of disclosure to key corporate stakeholders.
- Whether the company uses third party or external verification of emissions data to promote greater confidence and usage of the data.

Figure 14: Carbon Disclosure Elements

What does a disclosure score typically represent?

Low (<50)

Limited or restricted ability to measure and disclose climate related risks, opportunities and overall carbon emissions

Midrange (50-70)

Increased understanding and measurement of company-specific risks and opportunities related to climate change

High (>70)

Senior management understand the business issues related to climate change and build climate related risks and opportunities into core business

Disclosure score (Max. 100)



The journey to leadership

Compliance  Managing for value  Strategic advantage

Eligibility for the CDLI

In order to be included in the CDLI companies must:

- Respond using the Online Reporting System (ORS) prior to the deadline.
- Provide a public response.
- Score within the top 10% of the reporting population.

More information on the CDLI can be found in the information request, supporting methodology and guidance documents at www.cdproject.net.

Table 4: Carbon Disclosure Leadership Index for Iberia 125

Company	Country	Sector	Disclosure Score
Gas Natural	Spain	Utilities	95
Abengoa	Spain	Industrials	92
Ferrovial	Spain	Industrials	90
Telefonica	Spain	Telecommunications	90
Repsol YPF	Spain	Energy	89
Caixa Geral de Depositos	Portugal	Financials	88
Endesa	Spain	Utilities	88
Acciona	Spain	Industrials	86
Abertis	Spain	Industrials	85
Banco Santander	Spain	Financials	85
EDP	Portugal	Utilities	85
OHL	Spain	Industrials	84
Enagás	Spain	Energy	83

Carbon Performance Leadership Index 2011

What does a performance band represent?

This year, for the second time, all companies with a sufficiently high disclosure score received a performance band; the qualifying threshold to receive a performance band was a disclosure score of 50. Disclosure scores of less than 50 do not necessarily indicate poor performance; rather, they indicate insufficient information to evaluate performance. However, it is reasonable to assume that companies which do not disclose well may not be taking much action on climate change.

Performance is grouped in six bands: A, A-, B, C, D and E which are defined by the following characteristics.

The Carbon Performance Leadership Index (CPLI) includes the companies in the highest performance band (A) and provides a valuable perspective on the range and quality of activities being performed by the Global 500 in response to climate change.

Eligibility for the Carbon Performance Leadership Index

- Attain a disclosure score of 50 or above
- Attain a performance score greater than 70
- Score maximum performance points on question 13.1a (absolute emissions performance); at least a 2.65%⁵ reduction in carbon emissions must have been achieved as a result of emissions reduction activities over the last year
- Disclose gross global Scope 1 and Scope 2 figures
- Score maximum performance points for verification of Scope 1 and Scope 2.

Notes:

- Band A- companies are not in the CPLI. They are strong performers, with a performance score high enough to warrant inclusion in the CPLI but they did not meet all other CPLI requirements

- CDP reserves the right to exclude a company from the CPLI if there is anything in its response that calls into question its suitability for inclusion.

Performance scoring is an instructive exercise for all stakeholders. The score provides an indication of the extent to which companies are addressing the potential opportunities and risks presented by climate change. CDP recognizes that this is a process that will evolve over time. It is important for investors to keep in mind that the carbon performance band is not:

- A measure of how low carbon a company is
- An assessment of the extent to which a company's actions have reduced carbon intensity relative to other companies in its sector
- An assessment of how material a company's actions are relative to the business; the score simply recognizes evidence of action.

CDP recommends investors review individual company disclosures in addition to performance rankings in order to gain the most comprehensive understanding of company performance. A listing of companies and their bands is included in Appendix I. Companies that did not qualify for a performance band appear in Appendix I with a dash (-) in the performance band column.

The CPLI for the Iberia 125 is listed in Table 5. 6% (3) of the responding companies comply with the criteria for inclusion in the CPLI. The CPLI companies have shown leadership in carbon performance through a fully integrated climate change strategy and maturity in climate change and GHG reduction initiatives.

More information can be found in the information request, supporting methodology and guidance documents, as well as within individual company responses at www.cdproject.net.

Figure 15: Carbon performance elements

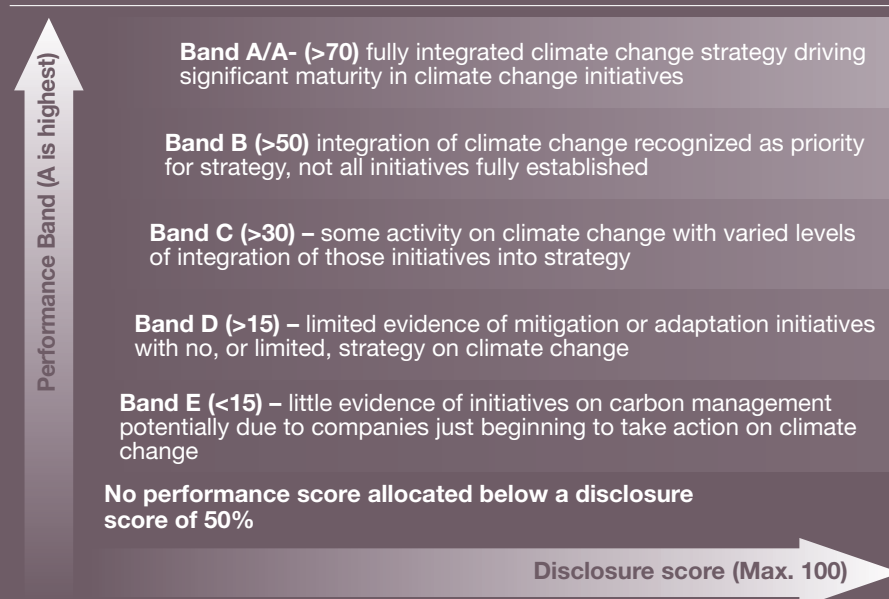


Table 5: Carbon Performance Leadership Index for Iberia 125

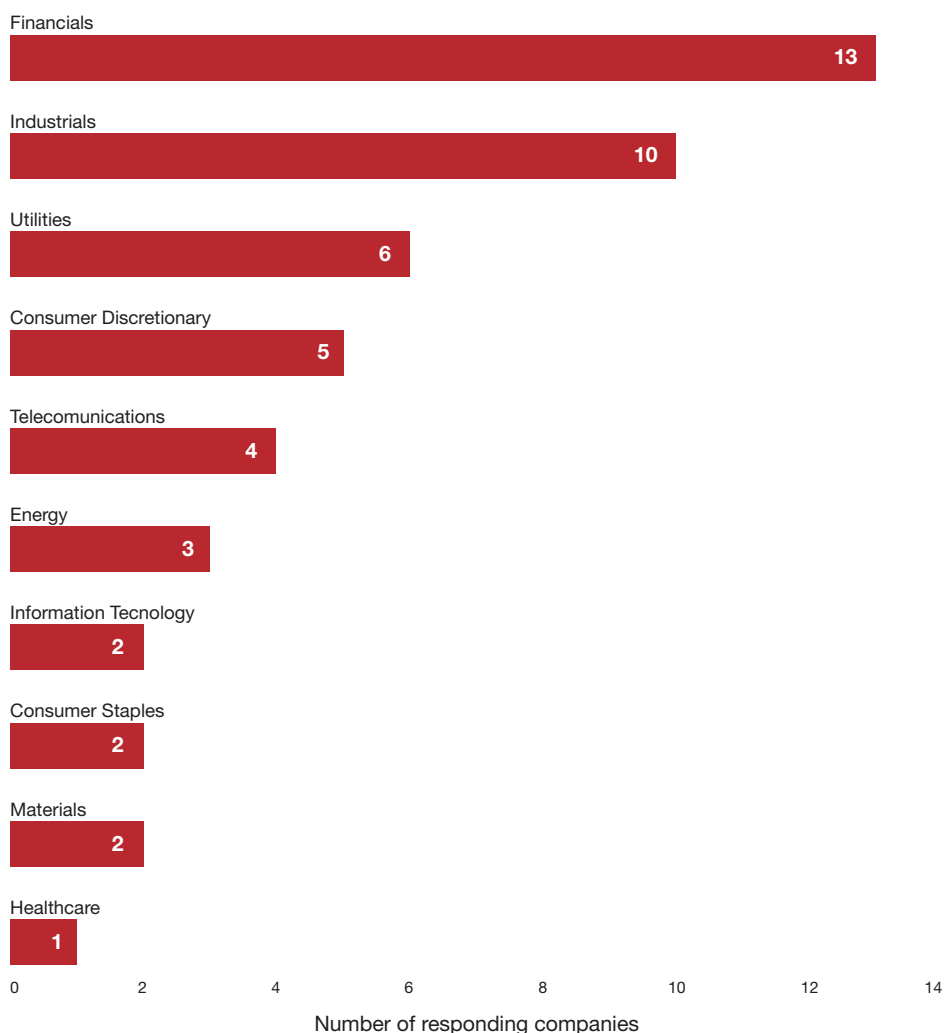
Company	Country	Sector	Performance Band
Acciona	Spain	Industrials	A
Ferrovial	Spain	Industrials	A
Gas Natural	Spain	Utilities	A

Sector analysis

All of the companies covered in the Iberia 125 report can be categorized into 10 sectors based on the Global Industry Classification Standard (GICS). The nature and scale of climate related risks and opportunities are often best compared on a sector by sector basis and examining companies by sector

often provides insight into the challenges faced by a particular sector. Of the 48 companies that responded to the CDP questionnaire the largest number of responding companies can be found the Financials (13), Industrials (10) and Utilities (6) sectors as illustrated in Figure 16.

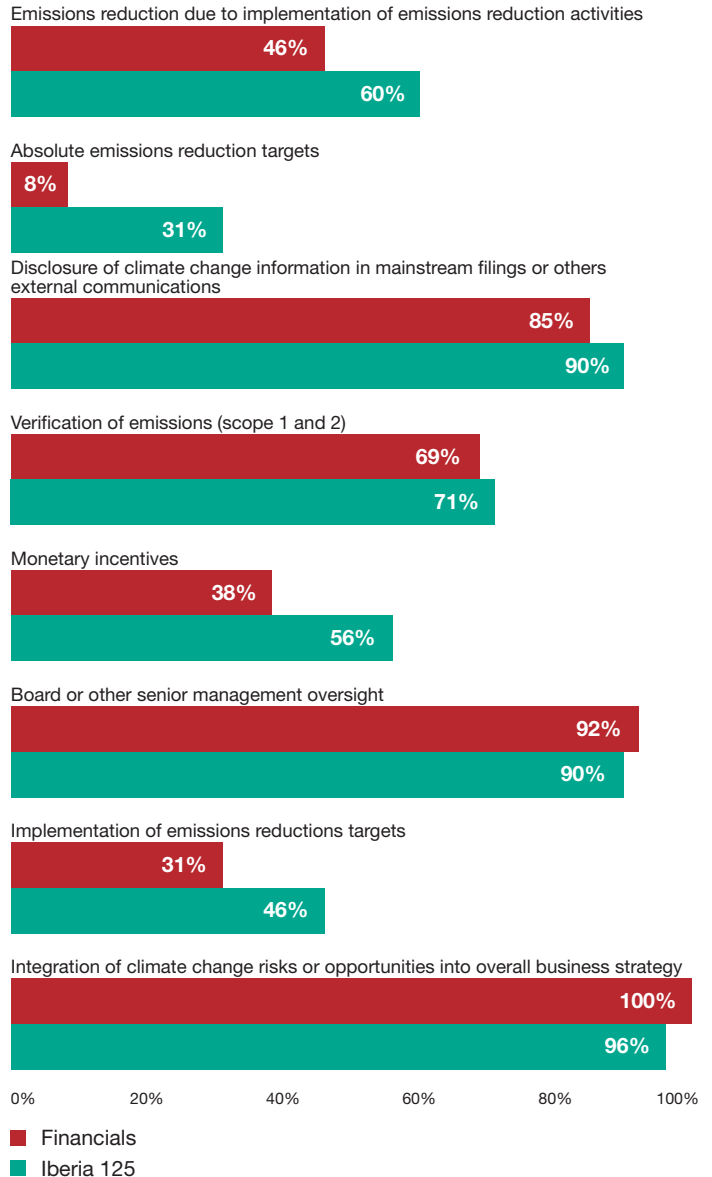
Figure 16: Number of responding companies by sector



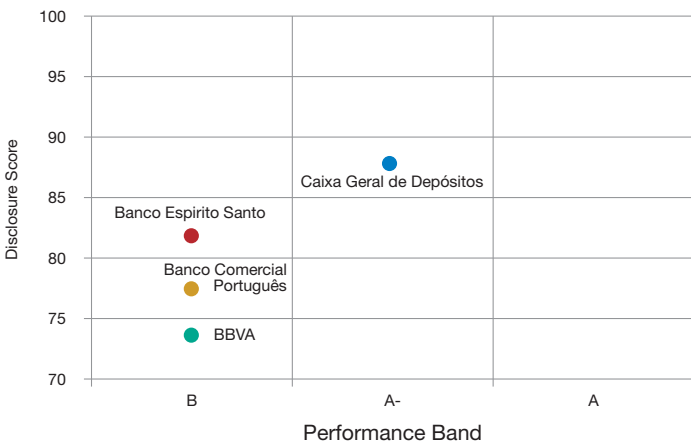
Financials

The Financials sector response rate is 100% and the majority of responses (92%, 12 out of 13) are available publically. The Financials companies score highest in the categories governance and strategy, emissions reporting and stakeholder engagement. All of the companies have integrated climate change risk or opportunities into their business strategy and 92% (12) have Board or senior management oversight of climate change issues. Caixa Geral de Depositos, Banco Santander, Banco Espírito Santo, Banco Comercial Português, BBVA and Mapfre score above 70 for disclosure, with Caixa Geral de Depositos and Banco Santander being in the CDLI. With regards to performance, only 30% (4) achieved performance bands of A- or B. Moreover, the Financials sector generally performs below the average in terms of emissions reductions. Although 100% (13) have active emissions reduction initiatives, only 31% (4 out of 13) have emissions reduction targets. 62% (8 of 13) of the companies in the Financials sector currently offer products or services that help third parties to reduce their carbon emissions. Overall reported emissions for the sector in the reporting period stand at 1.013.658 t CO₂e, which means a 18% decrease from the previous year.

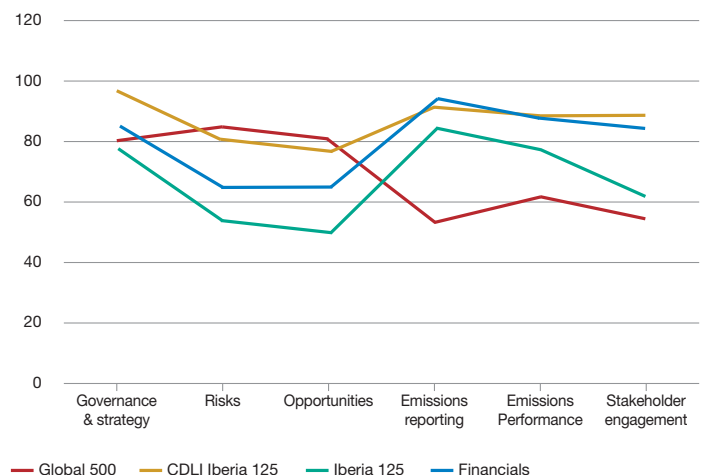
Key performance indicators



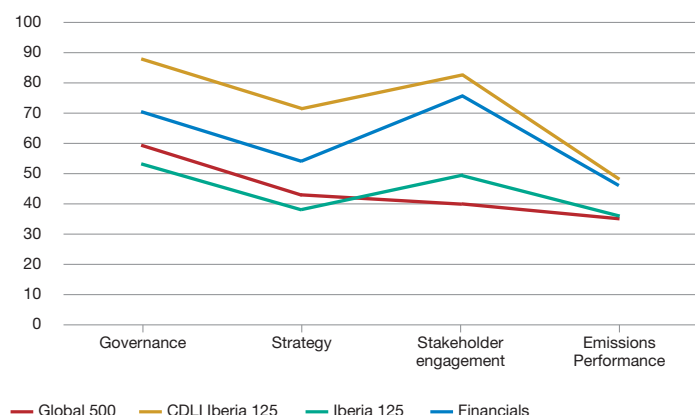
Carbon disclosure scores 70 or above vs. carbon performance bands A, A- and B



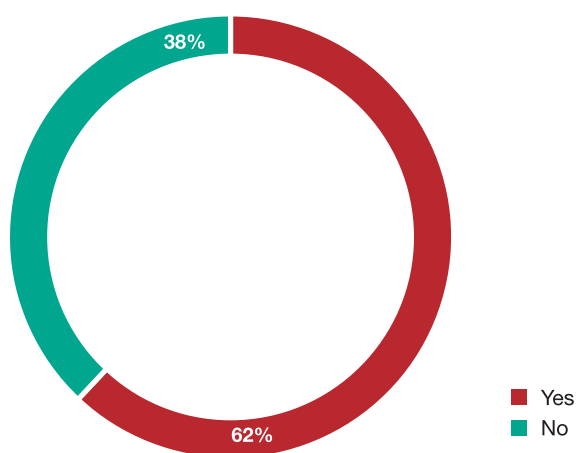
Carbon disclosure scores by category



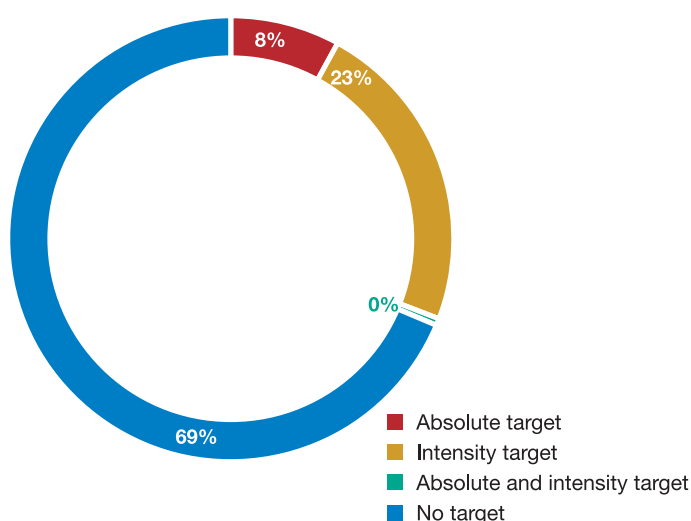
Carbon performance score by category



Offer products and services to reduce emissions



Emission reduction objectives



Opportunities identified

- Increase investment in renewable energy projects, energy efficiency and innovative clean tech companies.
- Increase investment in carbon funds, such as the European Carbon Fund and the FC2E Carbon Fund for Spanish Companies.

Risks detected

- Uncertainty surrounding new regulations (emissions trading, carbon tax, fuel tax, subsidies).
- Uncertainty around physical risks which could impact investments.
- Higher risks associated with increased credit risk.

Low carbon solutions

- Development of creative and innovative financial solutions.
- Financial products, including loans to retail/private clients, mortgages, corporate loans for clients to reduce carbon emissions by using renewable energy.

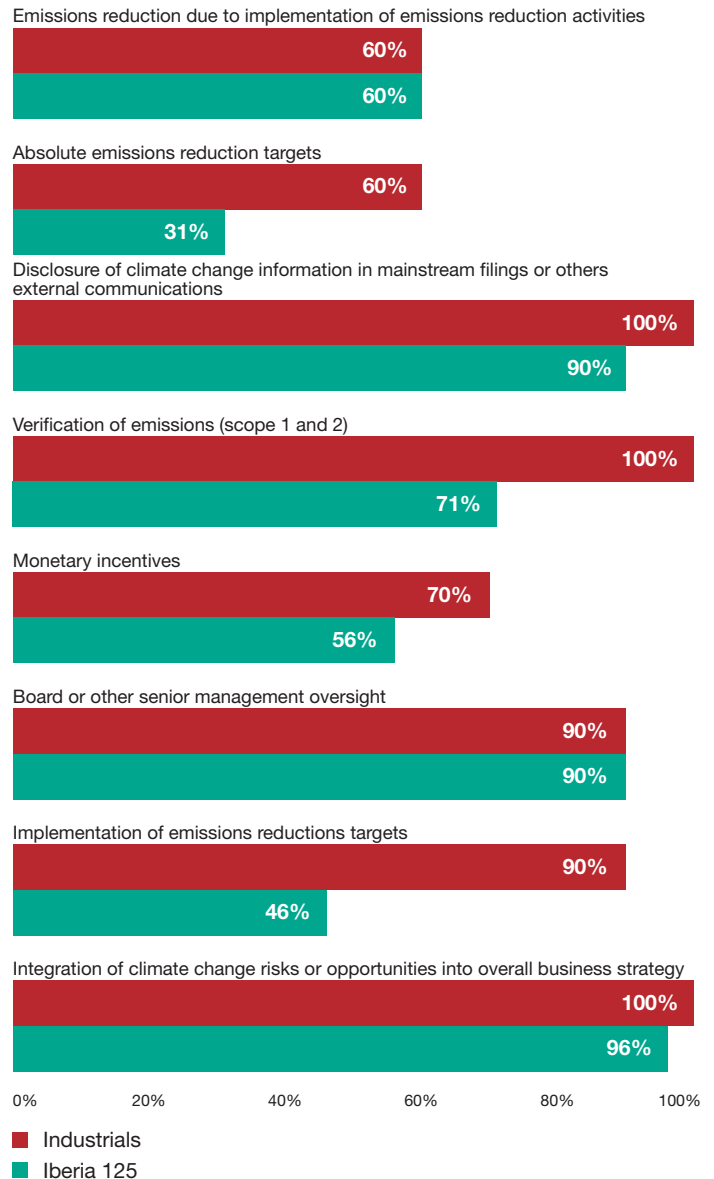
Volume of emissions and trends in the past year

	Total GHG emissions (scope 1 + 2) (t CO ₂ e)	Variation from previous year
Banco Santander	453,442	4%
BBVA	329,870	-39%
Banco Com. Português	80,399	-10%
Caixa Geral de Depositos	51,073	-2%
Banesto	21,186	-2%
Banco Espírito Santo	19,282	-24%
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Banco Popular Español	2,168	0%
Criteria Caixa Corp	360	-5%

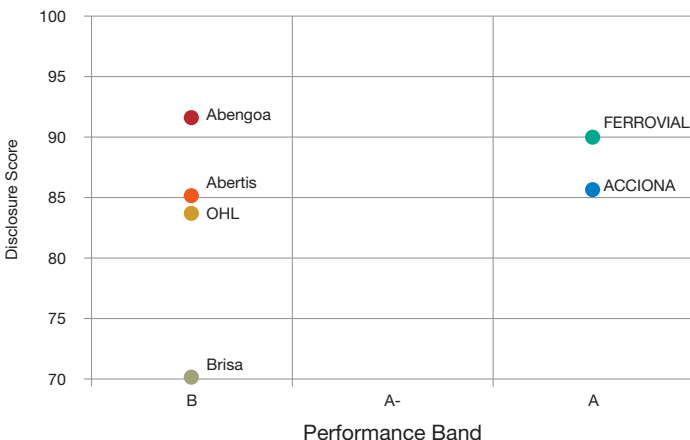
Industrials

The response rate in the Industrials sector is 100% with only one of the 10 companies' responses not being publically available. 60% (6 out of 10) of the companies scored above 70 for disclosure and in performance bands A, A- or B, with Ferrovial and Acciona forming part of the CPLI. This sector scores above average for disclosure in the categories governance and strategy. 100% (10) of companies have integrated climate change risks and opportunities into their business strategy and all companies in the sector have Board or senior management oversight of climate change issues. Moreover, 70% (7 of 10) offer their staff monetary incentives for the management of these issues. The Industrials sector also performs well in terms of emissions reporting, emissions performance and stakeholder engagement. The Industrials sector scores above average for the Iberia 125 in almost all the key performance indicators and all of companies in the sector offer emissions reductions products and services. In spite of 90% (9 out of 10) of the companies in this sector having emission reduction targets, in the reported period emissions increased by 10%, rising up to 14,954,137 t CO₂e.

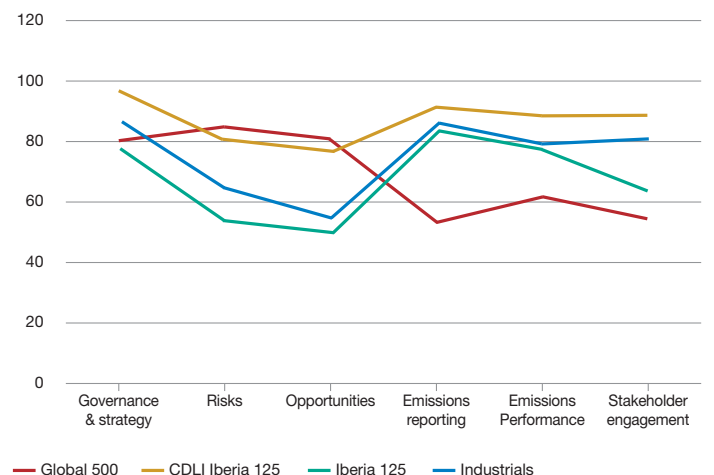
Key performance indicators



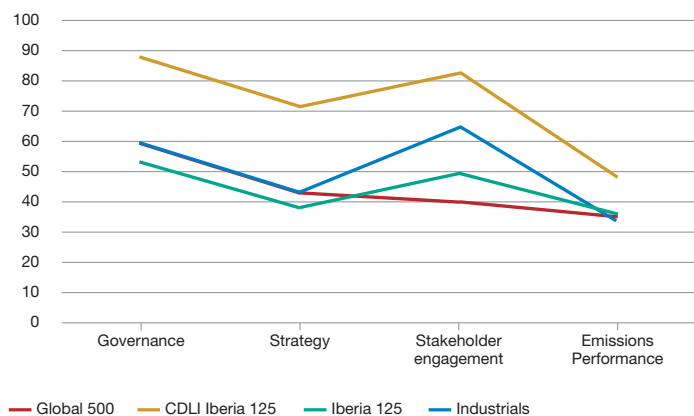
Carbon disclosure scores 70 or above vs. carbon performance bands A, A- and B



Carbon disclosure scores by category



Carbon performance score by category



Opportunities identified

- New commercial opportunities for products and services (e.g. innovation in infrastructure development and low-carbon transport solutions).

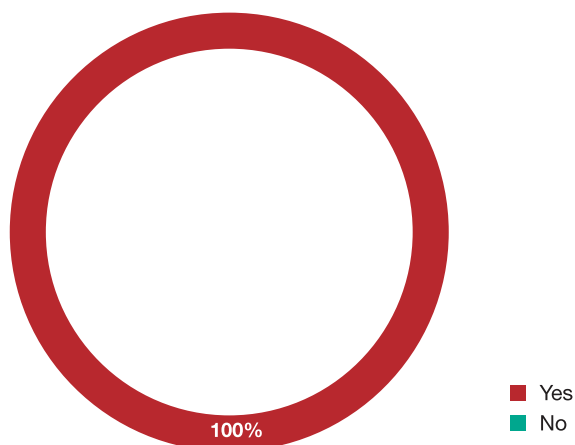
Risks detected

- Emissions reduction obligations.
- Increased risk premiums and financing costs due to uncertainty in climate regulations.

Low carbon solutions

- Investing in innovative infrastructure development and low-carbon transport solutions.
- Energy efficiency.

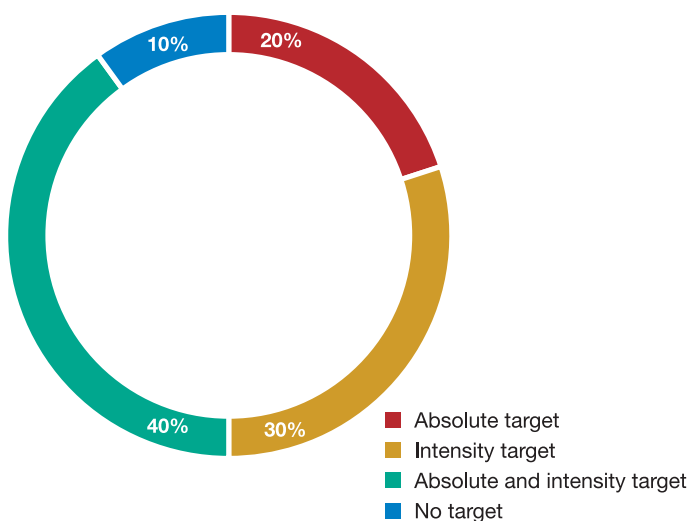
Offer products and services to reduce emissions



Volume of emissions and trends in the past year

	Total GHG emissions (scope 1 + 2) (t CO ₂ e)	Variation from previous year
Iberia	5,998,746	5%
Abengoa	3,025,730	73%
ACS	2,010,888	2%
Ferrovial	1,842,385	-4%
Acciona	1,063,070	-5%
OHL	423,835	-12%
Inditex	332,472	-1%
Abertis	187,858	-9%
Gamesa	50,709	8%
Brisa	18,443	-23%

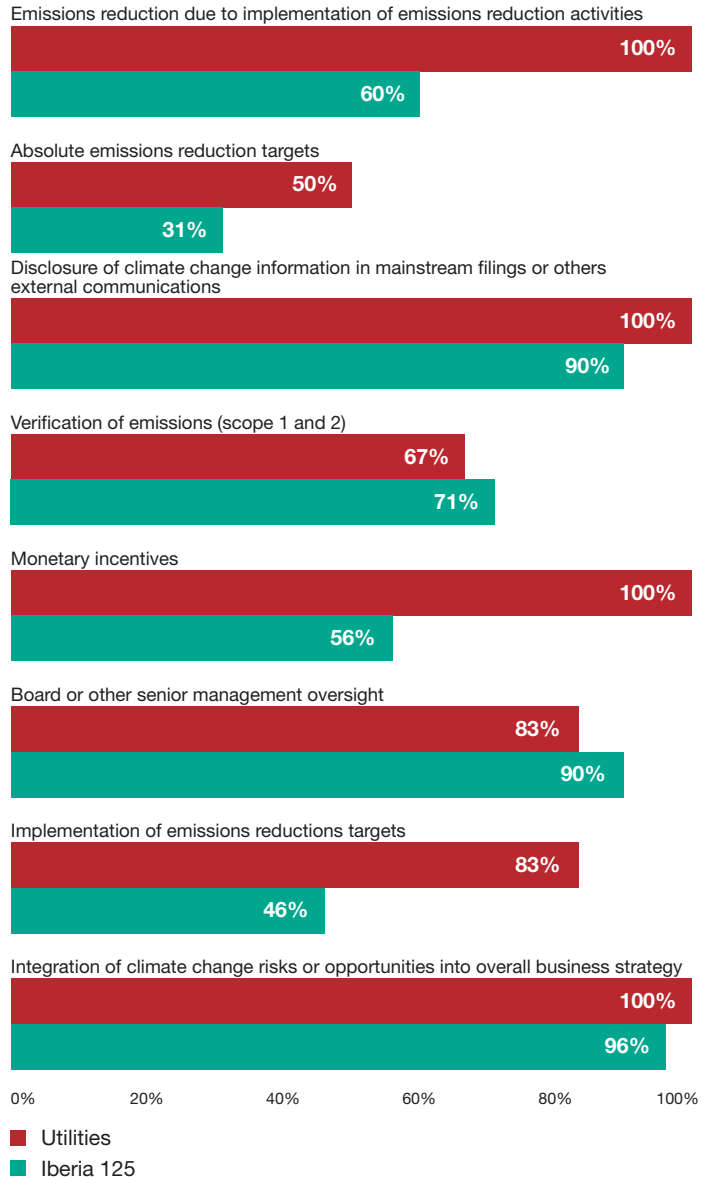
Emission reduction objectives



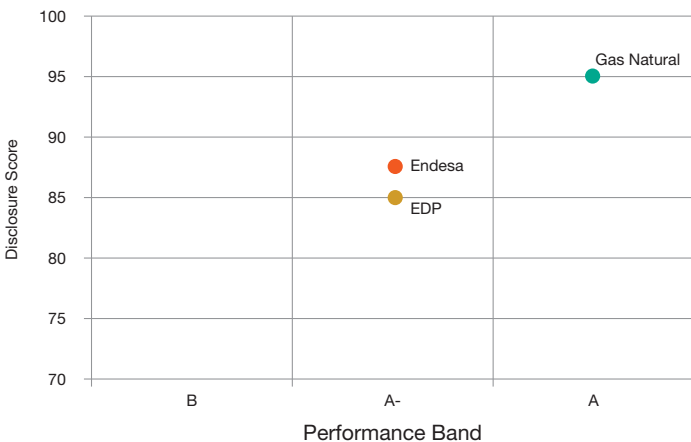
Utilities

The overall response rate for the Utilities sector is also 100% with responses of all 6 companies being publicly available. The Utilities sector scores above average for the Iberia 125 in the disclosure category emissions reporting but scores below average in the disclosure categories for risks and opportunities as well as in the performance category strategy. However, half of the companies in the Utilities sector -Gas Natural, Endesa and EDP- are included in the CDLI and have achieved performance bands A or A-. 83% (5 out of 6) of the companies in the sector have emissions reduction targets. The sector has the highest emissions (122,004,271 t CO₂e during the reporting year) but this year the sector has reduced emissions by 48%. Utilities companies are also leading the way in providing low carbon solutions.

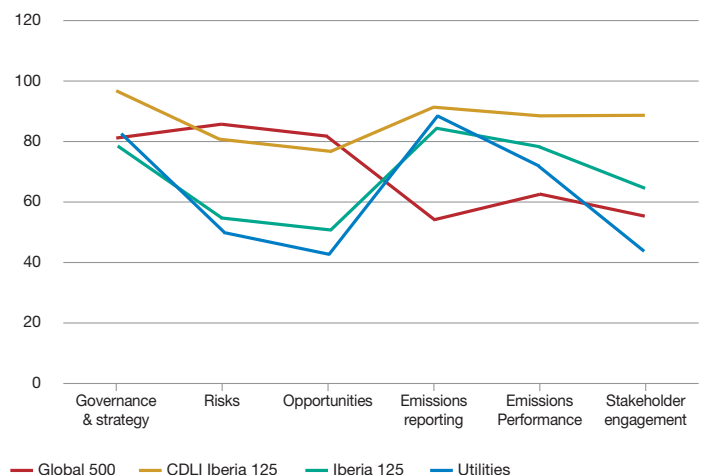
Key performance indicators



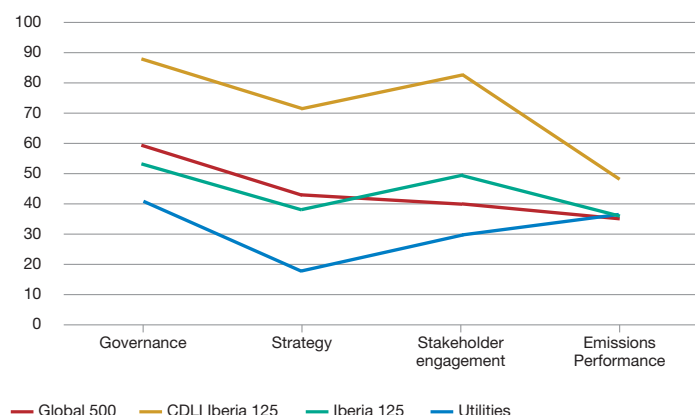
Carbon disclosure scores 70 or above vs. carbon performance bands A, A- and B



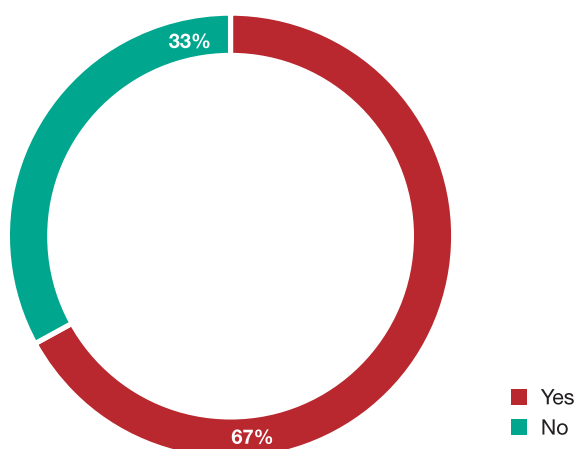
Carbon disclosure scores by category



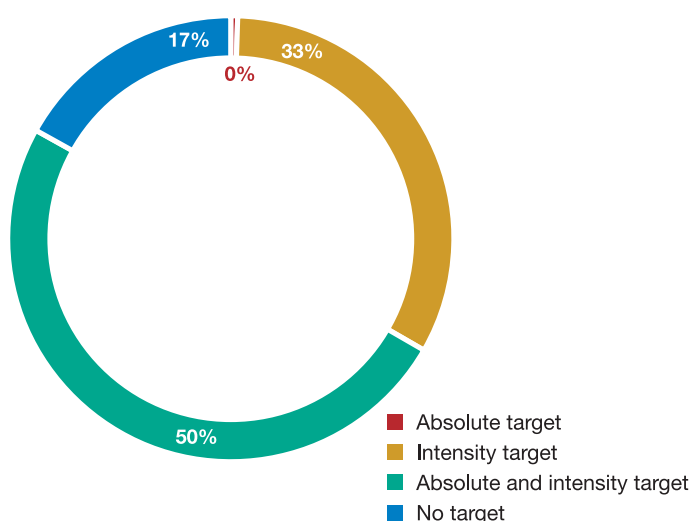
Carbon performance score by category



Offer products and services to reduce emissions



Emission reduction objectives



Opportunities identified

- Carbon taxes on fuel could encourage the use of natural gas due to its lower specific emissions in the short term and also electrical transport.
- Aging coal and nuclear power stations could be replaced with renewable energy, new gas.
- Capture new customers by developing tools, products and services that meet their increasing emissions reporting obligations and energy efficiency needs.
- Development of new technologies to improve energy efficiency and to reduce CO₂ emissions.

Risks detected

- Exposure to gas price fluctuations.
- Target for achieving a low or zero carbon economy could result in long term reduction in natural gas consumption.
- Cost of acquiring emission rights/permits will increase.
- Increasing environmental constraints related to air quality and increasing scope of regulation to include additional GHGs.

Low carbon solutions

- Creation of companies dedicated to innovative solutions in energy services and related products.
- Sustainable Mobility: use of low-emission and fuel efficient vehicles.

Volume of emissions and trends in the past year

	Total GHG emissions (scope 1 + 2) (t CO ₂ e)	Variation from previous year
Iberdrola	46,171,669	-6%
Endesa	39,291,885	-15%
Gas Natural	20,483,677	-31%
EDP	15,771,391	-26%
REN	214,536	-13%
R.E.E.	71,114	-8%

Appendix I: Table of emissions, scores and sector information by company

Company	Country	Sector	2011 Response status	2010 Response status	Carbon disclosure score
Abengoa	Spain	Industrials	AQ	AQ	92
Abertis Infraestructuras	Spain	Industrials	AQ	AQ	85
ACCIONA S.A.	Spain	Industrials	AQ	AQ	86
ACERINOX	Spain	Materials	AQ	NR	
ACS Actividades de Construcción y Servicios	Spain	Industrials	AQ	AQ	56
Altri SGPS SA	Portugal	Materials	NR	NR	
Amadeus IT Holding	Spain	Information technologies	AQ		
Amper	Spain	Telecommunications	NR	NR	
Antena 3 Television*	Spain	Consumer discretionary	DP	NR	
Arcelor Mittal	Luxembourg	Materials	AQ	AQ	34
Avanzit	Spain	Information technologies	NR	NR	
Banco BPI SA	Portugal	Financials	NR	NR	
Banco Comercial Português SA	Portugal	Financials	AQ	AQ	78
Banco de Valencia	Spain	Financials	NR	NR	
Banco Espírito Santo SA	Portugal	Financials	AQ	AQ	82
Banco Pastor	Spain	Financials	NR	NR	
Banco Popular Espanol	Spain	Financials	AQ	AQ	44
Banco Sabadell	Spain	Financials	AQ	AQ	58
Banco Santander	Spain	Financials	AQ	AQ	85
Banesto	Spain	Financials	AQ	AQ	46
BANIF SGPS SA	Portugal	Financials	AQ	AQ	67
Bankinter	Spain	Financials	AQ	AQ	68
Baron de Ley	Spain	Consumer staples	NR	NR	
BBVA	Spain	Financials	AQ	AQ	74
Bolsas Y Mercados Espanoles	Spain	Financials	AQ	AQ	
Brisa- Auto-Estradas de Portugal SA	Portugal	Industrials	AQ	AQ	70
Caixa Geral de Depositos	Portugal	Financials	AQ	AQ	74
CAM	Spain	Financials	NR		
Campofrio Alimentacion	Spain	Consumer staples	NR	NR	
Cementos Portland	Spain	Materials	NR	NR	
CIE Automotive	Spain	Consumer discretionary	AQ	AQ	24
CIMPOR - Cimentos de Portugal SGPS SA	Portugal	Materials	NR	NR	
Clinica Baviera	Spain	Healthcare	NR		
Codere	Spain	Consumer discretionary	NR	NR	
Cofina SGPS SA	Portugal	Consumer discretionary	NR	NR	
Construcciones & Auxiliar de Ferrocarril	Spain	Industrials	NR	NR	
Corporacion Financiera Alba	Spain	Financials	NR	NR	
Corticeira Amorim SGPS SA	Portugal	Consumer staples	DP	DP	
Criteria Caixa Corp	Spain	Financials	AQ	AQ	54
Dinamia	Spain	Financials	NR	NR	
Duro Felguera	Spain	Industrials	NR	NR	
Ebro Puleva	Spain	Consumer staples	NR	DP	
EDP - Energias de Portugal S.A.	Portugal	Utilities	AQ	AQ	85
EDP Renováveis SA	Portugal	Utilities	AQ(EDP)	NR	
ENAGAS	Spain	Energy	AQ	AQ	83
Endesa	Spain	Utilities	AQ	AQ	88
Ercros	Spain	Materials	NR	NR	

Carbon performance band	Non-Public	Total Emissions	Scope 1	Scope 2	Scope 3	Scope 3 source type	Verification/ Assurance	Target(s) Implemented
B		3,025,730	2,432,644	593,086	4,740,599	Tr, EC, Fu, PGS	✓	Int
B		187,858	36,882	150,976	4,216,424	USP	✓	
A		1,063,070	928,526	134,544	117,110	Tr, Ld; PGS	✓	
	NP							
E		2,010,888	1,998,929	11,959	5,063	EC	✓	
	NP							
-		184,825,000	165,226,000	19,599,000			†	
B		80,399	18,029	62,370	1,337	Tr, EC	✓	
B		19,282	5,307	13,975	9,647	EC, Tr, USP, Oth	✓	Int
-		2,168	1,000	1,168	3,362	Tr, EC	✓	
C		17,746	349	17,397	1,867	Tr	☹	
C		453,442	29,882	423,560	128,666	Tr, EC	✓	
-		21,186	191	20,995	4,758	Tr, EC	†	
D		13,020	3,349	9,671	15,887	Tr	†	
B		7,594	287	7,307	3,110	Tr, DSP, EC, Oth	✓	Abs
B		329,870	8,494	321,376	35,232	Tr	✓	
	NP							
B		18,443	7,660	10,783			✓	Abs
A-		51,073	4,288	46,785	2,717	Tr, Wa	☹	
-		50,481	50,481				†	
C		360	0	360	99	Tr	†	
A-		15,771,391	14,744,282	1,027,109	24,989	Tr, EC, Oth	✓	Int
B		329,456	239,272	90,184	2,182	Tr, TI, Oth	✓	
A-		39,291,885	38,631,310	660,575	186,117	Tr, Oth	✓	Int

Company	Country	Sector	2011 Response status	2010 Response status	Carbon disclosure score
Espirito Santo Financial Group S.A.	Luxembourg	Financials	AQ(Banco Espirito Santo)	DP	
Faes Farma	Spain	Healthcare	NR	NR	
FERROVIAL	Spain	Industrials	AQ	AQ	90
Fersa Energias Renovables	Spain	Utilities	NR	NR	
FINIBANCO,SGPS	Portugal	Financials	NR	NR	
Fluidra	Spain	Consumer discretionary	DP	NR	
Fomento de Construcciones y Contratas	Spain	Industrials	AQ	AQ	
Galp Energia SGPS SA	Portugal	Energy	AQ	NR	
Gamesa Corporación Tecnológica, S.A.	Spain	Industrials	AQ	AQ	46
Gas Natural SDG SA	Spain	Utilities	AQ	AQ	95
GLINTT-Global Intelligent Technologies SGPS SA	Portugal	Information technologies	DP	NR	
GRIFOLS	Spain	Healthcare	AQ	AQ	60
Grupo Catalana Occidente	Spain	Financials	NR	NR	
Grupo Empresarial ENCE	Spain	Materials	NR	NR	
Grupo Soares da Costa SGPS SA	Portugal	Industrials	DP	DP	
Iberdrola	Spain	Utilities	AQ	AQ	78
Iberdrola Renovables	Spain	Utilities	DP	DP	
Iberia Lineas Aereas de Espana SA	Spain	Industrials	AQ	AQ	57
Iberpapel Gestión	Spain	Materials	NR		
Ibersol SGPS SA	Portugal	Consumer discretionary	NR	DP	
Impresa SGPS SA	Portugal	Consumer discretionary	NR	DP	
Inapa - Investimentos Particip Gestao SA	Portugal	Materials	NR	NR	
Inditex	Spain	Consumer discretionary	AQ	AQ	57
INDRA A	Spain	Information technologies	AQ	AQ	60
Inmobiliaria Colonial	Spain	Financials	NR		
Jazztel	Spain	Information technologies	NR	NR	
Jerónimo Martins SGPS SA	Portugal	Consumer staples	AQ	AQ	52
Laboratorios Almirall	Spain	Healthcare	NR	NR	
Laboratorios Farmaceuticos Rovi	Spain	Healthcare	NR	NR	
MAPFRE	Spain	Financials	AQ	AQ	72
MARTIFER SGPS SA	Portugal	Industrials	DP	DP	
MEDIA CAPITAL	Portugal	Consumer discretionary	NR	NR	
Miquel Y Costas*	Spain	Materials	NR	NR	
Mota-Engil	Portugal	Industrials	DP	NR	
Natra	Spain	Healthcare	NR	NR	
NH Hoteles	Spain	Consumer discretionary	AQ	AQ	72
NOVABASE, SGPS	Portugal	Information technologies	NR	NR	
Obrascon Huarte Lain (OHL)	Spain	Industrials	AQ	AQ	84
Papeles y Cartones de Europa	Spain	Materials	NR	NR	
Pescanova	Spain	Consumer staples	NR		
Portucel Soporcel Group	Portugal	Materials	DP	DP	
Portugal Telecom	Portugal	Telecommunications	AQ	AQ	69
Prim	Spain	Healthcare	NR	NR	
Promotora de Informaciones	Spain	Consumer discretionary	NR	NR	
Prosegur	Spain	Industrials	NR	NR	
R.E.E.	Spain	Utilities	AQ	AQ	60
Realia Business	Spain	Financials	NR	NR	
REDITUS, SGPS	Portugal	Information technologies	NR	NR	
REN - Redes Energéticas Nacionais	Portugal	Utilities	AQ	NP	69

Carbon performance band	Non-Public	Total Emissions	Scope 1	Scope 2	Scope 3	Scope 3 source type	Verification/ Assurance	Target(s) Implemented
A		1,842,385	1,377,057	465,328	2,571,366	Tr, Wa, Oth	✓	Abs
	NP							
	NP							
-		50,709	13,081	37,628			✓	
A		20,483,677	19,393,186	1,090,491	20,830,478	PGS, Fu, TI, Tr, EC, DSP	✓	Abs
	NP							
E		54,119	32,073	22,046	564	Tr	✓	
	NP							
C		46,171,669	39,939,109	6,232,560	23,499,161	TSP, Tr, TI	✓	Int
	NP							
D		5,998,746	5,976,429	22,317	30,218	EC	✓	
D		332,472	22,870	309,602	41,029	TI	✓	Int
E		33,655	3,428	30,227	10,476,242	Tr	✓	Int
E		777,007	274,074	502,933	177,467	TI, Wa, Tr	†	
C		17,518	1,209	16,309			✓	Int
	NP							
	NP							
C		161,991	73,055	88,936	111,587,505	Tr, Wa	✓	Abs
B		423,835	349,457	74,378	20,187	Tr, PGS, TI, Wa, EC	✓	Int
	NP							
C		139,377	17,233	122,144	26,243	Fu	✓	Abs
C		71,114	63,215	7,899			†	
C		214,536	20,777	193,759	67	Tr	✓	

Company	Country	Sector	2011 Response status	2010 Response status	Carbon disclosure score
Repsol YPF	Spain	Energy	AQ	AQ	89
SACYR VALLE.	Spain	Industrials	NR	NR	
SAG GEST	Portugal	Consumer discretionary	NR	NR	
Semapa - Sociedade de Investimento e Gestao SGPS SA	Portugal	Industrials	NR	NR	
Service point solutions	Spain	Information technologies	NR	NR	
Sniace	Spain	Materials	NR	NR	
Sol Melia	Spain	Consumer discretionary	AQ	AQ	74
Solaria Energia y Medio Ambiente SA	Spain	Utilities	NR	NR	
Sonae	Portugal	Consumer staples	AQ	AQ	82
Sonae Capital SGPS SA	Portugal	Financials	DP	DP	
Sonae Indústria SGPS SA	Portugal	Industrials	NR	NR	
Sonaecom SGPS SA	Portugal	Telecommunications	AQ	AQ	77
SUMOL COMPAL	Portugal	Consumer staples	DP	DP	
Tecnicas Reunidas	Spain	Industrials	NR	NR	
Tecnocom	Spain	Information technologies	NR	NR	
Teixeira Duarte SpA	Portugal	Industrials	NR	NR	
TELECINCO	Spain	Consumer discretionary	AQ	AQ	55
Telefonica	Spain	Telecommunications	AQ	AQ	90
TOYOTA CAETANO	Portugal	Consumer discretionary	NR	NR	
Tubacex	Spain	Materials	NR	NR	
Tubos Reunidos	Spain	Materials	NR	NR	
Vidrala*	Spain	Materials	NR	NR	
Viscofan	Spain	Consumer staples	NR	NR	
Vista Alegre Atlantis	Portugal	Consumer staples	NR		
Vocento	Spain	Consumer discretionary	NR		
Vueling	Spain	Industrials	NR	NR	
Zardoya Otis	Spain	Industrials	NR	NR	
Zeltia	Spain	Healthcare	NR	AQ	
ZON Multimédia SGPS SA	Portugal	Telecommunications	AQ	AQ	

Carbon performance band	Non-Public	Total Emissions	Scope 1	Scope 2	Scope 3	Scope 3 source type	Verification/ Assurance	Target(s) Implemented
B		25,438,767	23,380,302	2,058,465	150,295,524	Fu, TI, Tr, TSP, USP	✓	Abs
C		126,780	28,212	98,568			✓	Int
B	NP	199,369	39,701	159,668	900,405	Tr, EC, Wa, Oth	◐	Int
B		30,552	4,836	25,716	2,731	Wa, Tr, EC, Oth	◐	
E		6,574	116	6,458	1,902	Tr, EC	†	
B		1,814,799	126,652	1,688,147	47,795	Tr, TI, EC	✓	Int
	NP							

AQ Answered questionnaire
AQ(L) Answered questionnaire late
AQ(SA) Company is either a subsidiary or has merged during the reporting process. See company in brackets for further information on company's status
DP Declined to participate
IN Provided information
NP Answered questionnaire but response not made publicly available
NR No response
- Company has not provided information or the information has not been made publicly available
* Company provided a figure for scope 2 contract arrangements
✓ Verification complete for reporting year
◐ Verification ongoing for reporting year - prior year(s) completed
◑ Verification ongoing for reporting year - first year started
† No verification or assurance

DSP End of life treatment of sold products
EC Employee commuting
Eq Capital goods
Fr Franchises
Fu Fuel energy - related activities not included in Scope 2
In Investment
Ld Leased assets (downstream)
Lu Leased assets (upstream)
Oth Other
PGS Purchased goods and services
PSP Processing sold products
SE Supplier emissions
TI Transportation and distribution (goods and services)
Tr Business travel
TSP Transportation and distribution of sold products inc. warehousing and retail
USP Use of sold products
Wa Waste generated in operations

Appendix II: Global key trends summary⁶

This table outlines some of the key findings from CDP 2011 by geography or industry data-set.⁷

Key Trends Indicators	Sample: geography / number of companies															
	Asia ex-JICK 170* ⁹	Australia 200	Benelux 150**	Brazil 80	Canada 200	Central & Eastern Europe 100	China 100	Emerging Markets 800	Europe 300	FTSE All-World 800	France 250	Germany and Austria 250*	Global 500	Global Electric Utilities 250	Global Transport 100	Iberia 125*
% of sample answering CDP 2011 ⁸	26	50	35	67	54	22	11	36	91	80	35	51	81	39	49	40
Number of companies answering CDP 2011 ⁸	45	101	52	53	108	22	11	287	272	625	87	128	405	98	49	50
Governance																
% of responders with Board or other executive level responsibility for climate change	65	76	79	78	57	33	64	71	85	72	77	63	73	78	69	79
% of responders with incentives for the management of climate change issues	49	53	60	46	44	25	82	55	70	71	63	38	72	62	69	56
Strategy																
% of responders with climate change integrated into their business strategy	84	84	89	80	73	50	73	79	92	89	88	69	90	93	88	96
% of responders engaging policymakers on climate issues to encourage mitigation or adaptation	67	75	79	70	63	17	36	67	84	81	76	54	84	91	84	71
Targets & Initiatives																
% of responders with emissions reduction targets	67	46	68	30	34	50	27	55	81	77	69	48	76	62	73	65
% of responders with absolute emissions reduction targets	42	26	40	26	16	25	9	32	42	45	33	28	44	41	33	31
% of responders with active emissions reduction initiatives in the reporting year	91	89	91	83	88	50	82	83	97	95	95	73	97	87	94	94
% of responders indicating that their products and services directly help third parties to avoid GHG emissions	63	60	66	59	54	25	45	54	69	70	65	62	70	80	59	79
Risks & Opportunities																
% of responders seeing regulatory risks	77	82	77	76	67	50	55	77	80	76	81	55	79	94	86	85
% of responders seeing regulatory opportunities	77	76	83	83	69	50	55	76	88	79	88	67	81	91	80	88
Emissions Data																
% of responders whose absolute emissions (Scope 1 & 2) have decreased compared to last year due to emission reduction activities	30	28	47	11	29	33	9	31	48	46	35	19	48	23	33	52
% of responders independently verifying any portion of Scope 1 emissions data ¹¹	47	45	70	43	34	33	9	48	74	62	64	40	67	68	61	77
% of responders independently verifying any portion of Scope 2 emissions data ¹¹	51	45	66	41	21	25	0	47	69	58	53	34	61	34	53	73

Sample: geography / number of companies

Sample: geography / number of companies															Key Trends Indicators	
India 200	Ireland 40	Italy 100*	Japan 500	Korea 200	Latin America 50	New Zealand 50	Nordic 260*	Russia 50	South Africa 100	Switzerland 100	Turkey 100	UK FTSE 350	US S&P 500	Overall ¹⁰		
28	49	35	41	47	58	42	55	8	83	59	17	69	68	N/A	% of sample answering CDP 2011 ⁸	
56	19	35	205	94	29	21	143	4	83	59	17	240	340	2057	Number of companies answering CDP 2011 ⁸	
78	68	61	91	62	73	60	65	67	90	69	60	93	49	68	% of responders with Board or other executive level responsibility for climate change	Governance
49	47	48	71	55	32	45	46	33	55	37	67	65	63	55	% of responders with incentives for the management of climate change issues	Governance
87	68	82	88	74	73	70	87	33	77	75	73	80	78	79	% of responders with climate change integrated into their business strategy	Strategy
73	53	67	77	65	68	45	73	33	77	61	47	73	70	68	% of responders engaging policymakers on climate issues to encourage mitigation or adaptation	Strategy
49	47	67	94	57	32	50	67	33	51	58	33	66	65	60	% of responders with emissions reduction targets	Targets & Initiatives
7	26	45	69	33	23	35	32	33	26	24	33	32	40	36	% of responders with absolute emissions reduction targets	Targets & Initiatives
91	89	91	94	59	86	70	89	67	94	88	73	93	90	87	% of responders with active emissions reduction initiatives in the reporting year	Targets & Initiatives
56	32	61	72	53	59	40	73	67	54	61	53	56	60	59	% of responders indicating that their products and services directly help third parties to avoid GHG emissions	Targets & Initiatives
76	68	76	90	70	73	70	77	33	96	58	73	80	63	73	% of responders seeing regulatory risks	Risks & Opportunities
87	58	79	82	63	73	50	80	67	91	68	80	77	63	73	% of responders seeing regulatory opportunities	Risks & Opportunities
18	32	42	40	40	9	25	39	33	40	31	33	40	38	33	% of responders whose absolute emissions (Scope 1 & 2) have decreased compared to last year due to emission reduction activities	Emissions Data
40	63	73	35	53	59	40	51	33	49	39	33	49	42	45	% of responders independently verifying any portion of Scope 1 emissions data ¹¹	Emissions Data
42	53	61	37	54	50	40	43	0	50	37	27	46	37	40	% of responders independently verifying any portion of Scope 2 emissions data ¹¹	Emissions Data

6 The key trends table provides a snapshot of response trends based on headline data. That is, responses given to main questions without assessment of detailed explanations in follow up questions. The numbers in this table are based on the online responses submitted to CDP as of 7 September 2011. They may therefore differ from numbers in the rest of the report which are based on the number of companies which responded by the applicable local deadline (e.g. 30 June 2011). Please refer to the CDP website and the local reports for an updated version of this table.

7 In some cases, the number of companies in a sample may differ slightly from the named sample size due to takeovers, mergers, acquisitions and duplicate share listings.

8 Includes offline responses to the CDP 2011 questionnaire and indirect answers submitted by parent companies. All other key trend indicators are based on direct and online company responses only.

9 Asia excluding Japan, India, China and Korea (ex-JICK).

10 Includes responses across all samples as well as responses submitted by companies not included in specific geographic or industry samples in 2011.

11 This takes into account companies reporting that data verification is either complete or underway.

* Denotes change in number of companies in sample compared to previous year.

** Denotes new sample for 2011.

Appendix III: Responses: Historical trends

Company	Country	2011 Response status	2010 Response status	2009 Response status	2008 Response status
Abengoa	Spain	AQ	AQ	AQ(NP)	AQ(NP)
Abertis Infraestructuras	Spain	AQ	AQ	AQ	AQ
ACCIONA S.A.	Spain	AQ	AQ	NR	AQ(NP)
ACERINOX	Spain	AQ(NP)	NR	NR	NR
ACS Actividades de Construcción y Servicios	Spain	AQ	AQ	AQ(NP)	IN
Altri SGPS SA	Portugal	NR	NR	NR	-
Amadeus IT Holding	Spain	AQ(NP)	-	-	-
Amper	Spain	NR	NR	NR	-
Antena 3 Television	Spain	DP	NR	NR	-
Arcelor Mittal	Luxembourg ¹²	AQ	AQ	AQ	AQ
Avanzit	Spain	NR	NR	NR	-
Banco BPI SA	Portugal	NR	NR	NR	-
Banco Comercial Português SA	Portugal	AQ	AQ	-	-
Banco de Valencia	Spain	NR	NR	NR	-
Banco Espírito Santo SA	Portugal	AQ	AQ	AQ(NP)	-
Banco Pastor	Spain	NR	NR	NR	-
Banco Popular Espanol	Spain	AQ	AQ	AQ	AQ
Banco Sabadell	Spain	AQ	AQ(NP)	AQ(NP)	AQ(NP)
Banco Santander	Spain	AQ	AQ	AQ	AQ
Banesto	Spain	AQ	AQ	AQ	AQ(NP)
BANIF SGPS SA	Portugal	AQ	AQ(NP)	-	-
Bankinter	Spain	AQ	AQ	AQ	AQ(NP)
Baron de Ley	Spain	NR	NR	NR	-
BBVA	Spain	AQ	AQ	AQ	AQ
Bolsas Y Mercados Espanoles	Spain	AQ(NP)	AQ(NP)	-	-
Brisa- Auto-Estradas de Portugal SA	Portugal	AQ	AQ	AQ	AQ(NP)
CAM	Spain	NR	-	-	-
Campofrio Alimentacion	Spain	NR	NR	NR	-
Cementos Portland	Spain	NR	NR	NR	-
CIE Automotive	Spain	AQ	AQ	AQ	-
CIMPOR - Cimentos de Portugal SGPS SA	Portugal	IN	NR	NR	NR
Clinica Baviera	Spain	NR	-	-	NR
Codere	Spain	NR	NR	NR	-
Cofina SGPS SA	Portugal	NR	NR	-	-
Construcciones & Auxiliar de Ferrocarriles	Spain	NR	NR	NR	-
Corporacion Financiera Alba	Spain	NR	NR	AQ(NP)	-
Corticeira Amorim SGPS SA	Portugal	DP	DP	-	-
Criteria Caixa Corp	Spain	AQ	AQ	NR	-
Dinamia	Spain	NR	NR	-	-
Duro Felguera	Spain	NR	NR	NR	-
Ebro Puleva	Spain	NR	NR	NR	-
EDP - Energias de Portugal S.A.	Portugal	AQ	AQ	AQ	AQ(NP)
EDP Renováveis SA	Portugal	AQ ¹³	NR	NR	-
ENAGAS	Spain	AQ	AQ	AQ	NR
Endesa	Spain	AQ	AQ	AQ	AQ

12 Based in Luxembourg, Arcerlor Mittal is traded on the Spanish Stock Exchange.

Company	Country	2011 Response status	2010 Response status	2009 Response status	2008 Response status
Ercros	Spain	NR	NR	NR	-
Espirito Santo Financial Group S.A.	Luxembourg ¹⁴	AQ ¹⁵	DP	-	-
Estoril Sol SGPS SA	Portugal	NR	-	-	-
Faes Farma	Spain	NR	NR	NR	-
FERROVIAL	Spain	AQ	AQ	AQ	AQ
Fersa Energias Renovables	Spain	NR	NR	NR	-
FINIBANCO,SGPS	Portugal	NR	NR	-	-
Fluidra	Spain	DP	NR	NR	-
Fomento de Construcciones y Contratas	Spain	AQ(NP)	AQ(NP)	AQ(NP)	NR
Galp Energia SGPS SA	Portugal	AQ(NP)	NR	NR	-
Gamesa Corporación Tecnológica, S.A.	Spain	AQ	AQ(NP)	-	-
Gas Natural SDG SA	Spain	AQ	AQ	AQ(NP)	AQ
GLINTT-Global Intelligent Technologies SGPS SA	Portugal	DP	NR	-	-
GRIFOLS	Spain	AQ	AQ	AQ	AQ
Grupo Catalana Occidente	Spain	NR	NR	NR	-
Grupo Empresarial ENCE	Spain	NR	NR	NR	-
Grupo Soares da Costa SGPS SA	Portugal	DP	DP	-	-
Iberdrola	Spain	AQ	AQ	AQ	AQ
Iberdrola Renovables	Spain	DP	DP	NR	-
Iberia Lineas Aereas de Espana SA	Spain	AQ	AQ	AQ	AQ
Iberpapel Gestión	Spain	NR	-	-	-
Ibersol SGPS SA	Portugal	NR	DP	-	-
Impresa SGPS SA	Portugal	NR	DP	-	-
Inapa - Investimentos Particip Gestao SA	Portugal	NR	NR	-	-
Inditex	Spain	AQ	AQ	AQ	AQ
INDRA A	Spain	AQ	AQ	AQ	AQ(NP)
Inmobiliaria Colonial	Spain	NR	-	-	-
Jazztel	Spain	NR	NR	NR	-
Jerónimo Martins SGPS SA	Portugal	AQ	AQ	AQ(NP)	-
Laboratorios Almirall	Spain	NR	NR	NR	-
Laboratorios Farmaceuticos Rovi	Spain	NR	NR	NR	-
MAPFRE	Spain	AQ	AQ	AQ(NP)	NR
MARTIFER SGPS SA	Portugal	DP	DP	-	-
MEDIA CAPITAL	Portugal	NR	NR	-	-
Miquel Y Costas	Spain	NR	NR	NR	-
Mota-Engil	Portugal	DP	NR	NR	-
Natra	Spain	NR	NR	NR	-
NH Hoteles	Spain	AQ	AQ	AQ	-
NOVABASE, SGPS	Portugal	NR	NR	-	-
Obrascon Huarte Lain (OHL)	Spain	AQ	AQ	AQ	-
Papeles y Cartones de Europa	Spain	NR	NR	NR	-
Pescanova	Spain	NR	-	-	NR
Portucel Soporcel Group	Portugal	DP	DP	NR	-
Portugal Telecom	Portugal	AQ	AQ	AQ(NP)	-
Prim	Spain	NR	NR	NR	-

13 Indirect answer. The company refers to EDP Energias de Portugal response.

14 Based in Luxembourg, Espirito Santo Financial Group is traded on the Spanish Stock Exchange.

15 Indirect answer. The company refers to Banco Espirito Santo's response.

Company	Country	2011 Response status	2010 Response status	2009 Response status	2008 Response status
Promotora de Informaciones	Spain	NR	NR	NR	-
Prosegur	Spain	NR	NR	AQ(NP)	-
R.E.E.	Spain	AQ	AQ	AQ	AQ
Realia Business	Spain	NR	NR	NR	-
REDITUS, SGPS	Portugal	NR	NR	-	-
REN - Redes Energéticas Nacionais	Portugal	AQ	AQ(NP)	AQ(NP)	-
Repsol YPF	Spain	AQ	AQ	AQ	AQ
SACYR VALLE.	Spain	NR	NR	NR	NR
SAG GEST	Portugal	NR	NR	-	-
Semapa - Sociedade de Investimento e Gestao SGPS SA	Portugal	NR	NR	DP	DP
Service point solutions	Spain	NR	NR	NR	-
Sniace	Spain	NR	NR	-	-
Sol Melia	Spain	AQ	AQ	AQ(NP)	-
Solaria Energia y Medio Ambiente SA	Spain	NR	NR	NR	NR
Sonae	Portugal	AQ	AQ(NP)	AQ(NP)	-
Sonae Capital SGPS SA	Portugal	DP	DP	-	-
Sonae Indústria SGPS SA	Portugal	NR	NR	NR	-
Sonaecom SGPS SA	Portugal	AQ	AQ(NP)	AQ	-
SUMOL COMPAL	Portugal	DP	NR	-	-
Técnicas Reunidas	Spain	NR	NR	NR	-
Tecnocom	Spain	NR	NR	NR	-
Teixeira Duarte SpA	Portugal	NR	DP	NR	-
TELECINCO	Spain	AQ	AQ(NP)	AQ(NP)	NR
Telefonica	Spain	AQ	AQ	AQ	AQ(NP)
TOYOTA CAETANO	Portugal	NR	DP	-	-
Tubacex	Spain	NR	NR	NR	-
Tubos Reunidos	Spain	NR	NR	NR	-
Vidrala	Spain	NR	NR	NR	-
Viscofan	Spain	NR	NR	NR	-
Vista Alegre Atlantis	Portugal	NR	-	-	-
Vocento	Spain	NR	-	NR	-
Vueling	Spain	NR	NR	-	-
Zardoya Otis	Spain	NR	NR	NR	-
Zeltia	Spain	NR	AQ	NR	-
ZON Multimédia SGPS SA	Portugal	AQ(NP)	AQ(NP)	AQ(NP)	-

AQ: Answered questionnaire, response publicly available

AQ(NP): Answered questionnaire, response not publicly available

IN: Not answered, provides information

DP: Declined to participate

NR: No answer

-: Company not included in the sample that year

Carbon Disclosure Project 2011

This report and all of the responses from public companies are available at www.cdproject.net

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December 2011

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