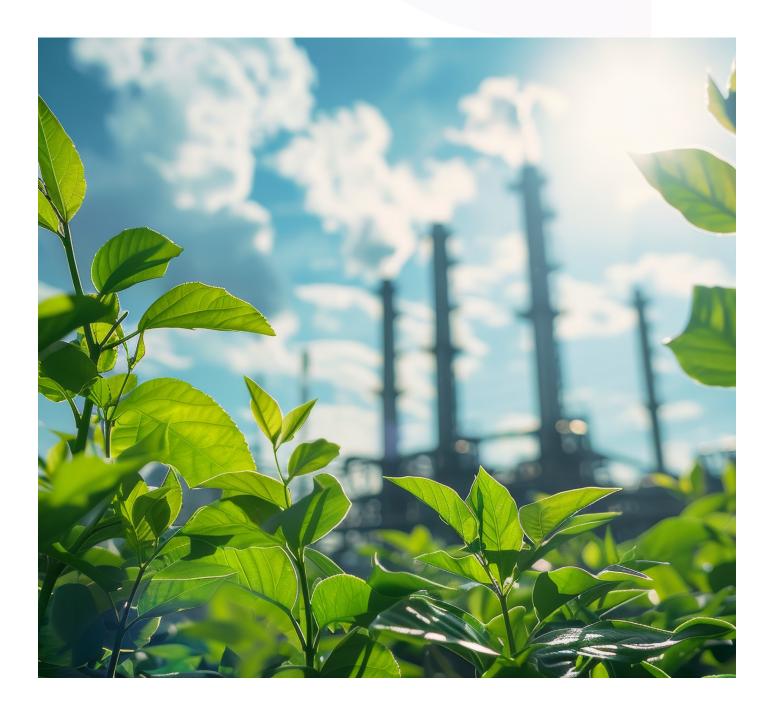
ESG CORNER

OUR MONTHLY NEWSLETTER

In this Month's Edition

California Air Resources Board advances rule-making under climate disclosure laws in the state Largest engineering company in India raises ESG Bond under SEBI's Framework Kuwait Ramps up Campaign for Responsible Energy Use



FOREWORD

Greetings, and welcome to the latest edition of Unique' ESG Corner!

This month, we spotlight a significant regulatory shift occurring in the United States, where the California Air Resources Board (CARB) is advancing rulemaking under the state's landmark climate disclosure laws, SB 253 and SB 261. With proposals focused on global interoperability, Scope 3 transparency, and investor-grade climate risk disclosures, California is positioning itself as a global leader in corporate climate accountability and setting a de facto national standard in the United States. These developments are poised to impact how large companies report emissions and climate-related risks across their value chains, particularly in the absence of federal mandates.

At the same time, momentum is building across other jurisdictions. Canada has finalized its antigreenwashing guidance, reinforcing the need for accurate and verifiable environmental claims. In Europe, EFRAG is working to simplify ESG disclosures under the CSRD framework, while the EU advances a more streamlined approach to its Carbon Border Adjustment Mechanism (CBAM). Meanwhile, in India, the issuance of ESG debt instruments continues to gain traction, and the Middle East is experiencing new investments in circular economy infrastructure and climate resilience.

As regulatory expectations rise and investor scrutiny deepens, businesses must navigate an increasingly complex, but also increasingly aligned, global ESG landscape. We hope this edition provides you with actionable insights to help you stay ahead.

Enjoy the read!

Anu Chaudhary Partner, Global Head of ESG Consulting



01

IN THE NEWS

This section focuses on key developments globally, in the US, India, and the Middle East. It dissects the most recent news and analyzes its potential to influence regional landscapes, businesses, and consumers. Unique provides insights into how these developments may shape current market dynamics and set the stage for future opportunities and challenges.

GLOBAL

CANADA PUBLISHES FINAL ANTI-GREENWASHING GUIDANCE

On 5 June 2025, the Competition Bureau of Canada published its final Environmental Claims Guidelines, concluding a year-long consultation that garnered over 400 public submissions. The document provides companies with a practical roadmap for communicating environmental benefits without breaching the Competition Act, which was amended in June 2024 to include explicit antigreenwashing provisions.

The Bureau does not dictate what businesses may or may not say about sustainability; rather, it has one principle: claims must be accurate, not misleading, and backed by defensible evidence. Product-level assertions must now be based on "adequate and proper testing," while statements about a firm's overall operations must be substantiated using internationally recognized methodologies. Together, these requirements aim to eliminate vague or exaggerated promises and to align Canadian practice with global expectations for credible climate disclosures. Penalties for non-compliance can be steep. Corporations that violate the deceptive-marketing sections of the Act face fines up to CAD 10 million for a first offence and CAD 15 million for subsequent ones. Where regulators cannot easily calculate the benefit a company gained from misleading claims, the penalty may rise to three percent of worldwide annual revenue or triple the advantage obtained, whichever is greater.

Beyond the legal risk, the new guidance reflects growing scrutiny from investors, customers, and regulators who want verifiable environmental information. Marketing and sustainability teams are therefore advised to review existing green language, tighten data collection processes, and consult third-party standards before launching new campaigns. A backgrounder summarizing the consultation feedback and offering additional compliance tips is available on the Bureau's website.



INVESTORS REMAIN COMMITTED TO ESG AMID UNCERTAINTY

BNP Paribas' latest ESG Survey, conducted by CoreData Research, gathered insights from 420 asset owners, asset managers, and private capital firms across 29 global markets. Despite ongoing global uncertainty, the findings indicate that institutional investors remain deeply committed to sustainable investing, now viewed not as a constraint but as a source of long-term opportunities and innovation.

The 2025 survey reveals a shift away from generic ESG approaches toward more thematic, impactdriven strategies. The energy transition remains a dominant theme, but this year also sees a heightened focus on the social dimension, particularly the importance of a "just transition" that ensures climate action supports workers and communities. Investors are increasingly recognizing the interconnectedness of climate, biodiversity, and social impact, integrating these elements into their broader investment strategies.

Regional insights reveal that Asia-Pacific and EMEA investors are taking a particularly active role in advancing ESG practices and influencing standards. North American investors are also accelerating their adoption of sustainability themes, linking ESG to alpha generation and competitive advantage.

The survey also identifies key behaviors among ESG leaders, including deeper engagement with portfolio companies and the strategic use of external partnerships to enhance internal capabilities. Notably, private capital managers are emerging as influential champions of ESG, with sustainability increasingly embedded in both their operations and culture.

Overall, the research highlights a more dynamic, integrated approach to ESG, where collaboration, thematic focus, and long-term thinking are guiding the next wave of sustainable investment.

EFRAG DELIVERED FIRST ESRS SIMPLIFICATION UPDATE

On 20 June 2025, the European Financial Reporting Advisory Group (EFRAG) delivered an update to the European Commission on its efforts to simplify the European Sustainability Reporting Standards (ESRS). EFRAG published its progress report (as of 20 June) providing an update of the work performed so far, with final decision expected by the end of July. A public consultation will occur from August to September.

The revisions respond to widespread concerns about the complexity of the ESRS under the Corporate Sustainability Reporting Directive (CSRD). EFRAG aims to streamline disclosures while preserving quality. Changes will address overlap between standards, improve clarity, and align with frameworks like the ISSB and the Sustainable Finance Disclosure Regulation (SFDR).

Chiara del Prete, chair of EFRAG's technical expert group, said the updates will prioritize material, decision-useful information. Areas under review include double materiality and reducing excessive documentation demands.

The simplification process coincides with broader Omnibus negotiations in the European Parliament, which could narrow the scope of the CSRD and the Corporate Sustainability Due Diligence Directive (CSDDD).



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Across jurisdictions, momentum is building for more credible, targeted, and accountable approaches to ESG issues. In Canada, regulators have sent a clear message with the release of final anti-greenwashing guidelines: environmental claims must be substantiated, specific, and backed by credible data. The Competition Bureau's guidance not only raises the compliance bar but also signals increasing alignment with international disclosure expectations. Companies are being called to close the gap between marketing and verifiable performance, with a growing emphasis on providing defensible evidence and adhering to third-party standards.

At the same time, investors globally are not pulling back from ESG commitments. In fact, they are evolving their approach. BNP Paribas' 2025 ESG survey reveals a decisive shift away from generalized ESG posturing toward more thematic, impact-driven strategies. The energy transition remains central, but investors are also placing greater emphasis on the social dimension, including just transition principles. Leaders in this space are advancing sustainability by engaging deeply with their portfolio companies and leveraging strategic partnerships to integrate ESG into core operations.

Meanwhile, in Europe, EFRAG is responding to calls for greater usability and efficiency in ESG reporting. Its proposals to streamline the ESRS under the CSRD are expected to reduce reporting burdens while maintaining relevance and quality. These changes, combined with potential adjustments from ongoing Omnibus negotiations, could reshape how sustainability is reported and regulated across the EU.

Together, these developments reflect a broader recalibration of the ESG landscape. Regulators are tightening expectations, investors are raising the bar on impact, and standard setters are working to make compliance more practical and aligned.



US

WASHINGTON DC HOSTS FIRST CLIMATE WEEK

Washington, D.C. hosted its first-ever Climate Week from April 28 to May 2, 2025, drawing more than 4,500 participants to over 160 events across the region. Spearheaded by co-founders C'pher Gresham and Vid Mićević, and supported by 200+ volunteers, the event aimed to bring together D.C.'s fragmented climate, tech, and policy communities.

The idea stemmed from Climate DC, a local meetup founded by Mićević, which gradually evolved into a broader movement. "We have the incredible mission to establish D.C. as the home of climate," Gresham said at the kickoff.

A national climate job fair was among the highlights, connecting over 2,000 professionals many of whom were affected by federal layoffs with opportunities in the green economy. Organized by Clean Energy for America and the Clean Energy Leadership Institute, the fair underscored the growing demand for climate talent.

Fueled by momentum from the Inflation Reduction Act, the founders saw Climate Week as a chance to celebrate progress and build bridges across sectors.

US DEPARTMENT OF LABOR SIGNALS INTENT TO REVERSE ESG INVESTMENT RULE

The US Department of Labor (DOL) plans to reverse a 2022 rule that allows fund managers to consider environmental, social, and governance (ESG) factors in retirement investments, if those factors support long-term profitability. The move reflects shifting priorities under the Trump administration and will kick off with a new rulemaking process in spring 2026.

The DOL regulates investment standards under ERISA, with profit remaining the primary requirement. The 2020 rule under President Trump limited decisions to strictly "pecuniary factors." Biden's administration revised it in 2022, allowing ESG considerations if they contributed to financial outcomes. Legal challenges followed, and the case Utah v. Chavez-DeRemer is now before the Fifth Circuit Court of Appeals.

In April, the Department of Justice notified the court of the DOL's intent to rescind the 2022 rule. The DOL confirmed this in May, stating that it will begin new rulemaking, which is expected to appear in the Spring 2026 Regulatory Agenda, set for release in July. This will mark the start of a formal public process to revise the standard through the rulemaking process.

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These two headlines reflect the changing and often conflicting currents shaping US climate and sustainability progress: local momentum is building, even as federal policy shifts stall or reverse. Over five days, Climate Week D.C. brought together the region's climate, tech, and policy communities, reinforcing the city's emergence as a hub for climate innovation and collaboration.

In contrast, the Department of Labor announced plans to roll back a 2022 rule allowing retirement fund managers to consider ESG factors when aligned with financial performance. The proposed reversal, expected to begin formal rulemaking in 2026, signals a return to a narrower interpretation that limits ESG to strictly financial considerations. Legal challenges are ongoing.

Together, these developments highlight a growing disconnect: cities and communities are advancing climate action, while federal policy remains vulnerable to political shifts. For organizations, the need to build resilient, forward-looking strategies has never been clearer. Regulatory headwinds may come and go, but meaningful progress depends on leadership beyond policy.

INDIA

L&T HAS RAISED INR 500 CRORE VIA INDIA'S FIRST LISTED ESG BOND UNDER SEBI FRAMEWORK IN PARTNERSHIP WITH HSBC

Larsen & Toubro (L&T) has become the first Indian company to issue a listed ESG bond under the Securities and Exchange Board of India's (SEBI) newly introduced sustainability-linked bond framework. The INR 500 crore issuance, with HSBC as the sole lead arranger, is tied to environmental targets, including reducing freshwater consumption and cutting greenhouse gas emissions. These goals support L&T's long-term plans to achieve water neutrality by 2035 and carbon neutrality by 2040. The bond fully complies with SEBI's new guidelines, which require transparency, independent assessments, and clear ESG performance metrics, aligning Indian issuers with international standards.



L&T's recent action marks a pivotal moment for India's corporate landscape, underscoring that sustainability is now integral to financial strategy, rather than a peripheral initiative. By linking funding to measurable environmental outcomes, the company is setting a strong precedent for accountability and long-term impact. This also signals a broader shift in the market, where investors are looking beyond profits to assess how companies manage their environmental and social responsibilities. As more businesses adopt this approach, ESG performance is anticipated to become as critical as financial performance in securing capital and establishing trust and credibility.

PCMC LISTS INR 200 CRORE GREEN BONDS ON BSE, A FIRST FOR MAHARASHTRA

Pimpri Chinchwad Municipal Corporation (PCMC) has made history by becoming the first civic body in Maharashtra to issue green bonds, raising INR 200 crore for sustainable urban transport projects. The bond, which was oversubscribed 5.13 times, is listed on the Bombay Stock Exchange (BSE) and will fund two key initiatives: the Harit Setu bridge and a green mobility corridor. Both projects are part of PCMC's broader urban transformation plan, which aims to reduce travel times and enhance connectivity through sustainable solutions. Compliant with SEBI's green bond guidelines, the issue serves as a model for other municipalities to raise capital for climate-resilient infrastructure, particularly in the face of growing urban challenges like pollution and congestion.

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PCMC's successful green bond issuance represents a notable advancement for municipal financing in India, especially within the sphere of sustainable urban development. With the oversubscription of the bond, it's clear that investors are increasingly drawn to projects that focus on climate resilience and urban mobility. This move sets a powerful example for other Indian cities, showing that green bonds can be an effective tool for addressing environmental and infrastructure challenges while ensuring fiscal responsibility. As the government pushes for more municipal participation in financial markets, we can expect a rise in similar initiatives, transforming urban landscapes and improving the quality of life for millions.

MIDDLE EAST

OMAN OPENS FIRST COPPER WASTE RECYCLING PLANT

Oman inaugurated its first industrial plant dedicated to converting legacy copper mining waste into high-purity copper using renewable energy and eco-friendly technologies as a major step toward green industrialization and sustainable resource management in line with Oman Vision 2040. The plant is located in the Wilayat of Suhar under the auspices of Qais bin Mohammed al Yousef, Minister of Commerce, Industry and Investment Promotion.

The project aims to turn environmental liabilities into economic value by reprocessing waste from historical copper mining operations. The first production phase is scheduled to commence in June 2025, with an annual output capacity of 60 tonnes of copper cathodes, an investment of over OMR 41 million (~USD 106.6 million).

By December 2026, capacity is expected to scale to 12,000 tonnes annually, significantly enhancing Oman's footprint in the regional green mining sector.



As Oman seeks to elevate its industrial competitiveness, reduce environmental impact, and create new value chains from existing resources, this new recycling plant offers a blueprint for scalable, environmentally responsible industrial growth, reinforcing the Sultanate's position in the global transition to sustainable development.

Using a closed-loop hydrometallurgical process, the facility reprocesses legacy mining waste without generating secondary effluents or relying on fossil fuels. Copper cathodes produced at the facility will be classified as sustainably recycled metals, a key asset in global decarbonization supply chains.

This project advances Oman's Vision 2040 and Industrial Strategy 2040 by boosting value-added production, attracting high-tech investments and localizing industries that harness the country's natural resources.

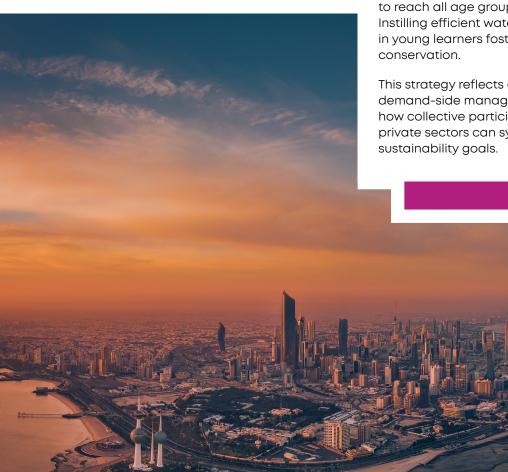


KUWAIT RAMPS UP CAMPAIGN FOR RESPONSIBLE ENERGY USE

Kuwait's Ministry of Electricity, Water and Renewable Energy launched the third edition of its National Energy Saving Campaign (Waffer) to promote awareness of electricity and water conservation, aimed at protecting resources, reducing waste, and ensuring environmental and economic sustainability.

The campaign brings together a broad media outreach to demonstrate efficient usage techniques, and a bespoke animated video aimed at teaching children the importance of conserving water and electricity.

Framed as a shared national responsibility, the effort responds to Kuwait's high per-capita resource consumption and seeks to unite public bodies, private institutions and citizens in adopting resource conservation efforts. The main goal is to cut electricity and water consumption by 25% over the next four years in alignment with the country's vision, and carbon neutrality targets.



ر َنُ Uniqus' POV

Kuwait's per capita energy consumption remains high compared to other countries, calling for increased efforts to promote responsible resource use. As such, Kuwait has been at the forefront of developing and implementing projects and initiatives aimed at resource conservation across all levels of society.

Earlier this year, the Minister of Electricity, Water and Renewable Energy issued a ministerial decree to form a specialized committee tasked with raising public awareness on the importance of rationalizing electricity and water consumption, particularly during the summer months, as part of broader sustainability efforts.

Kuwait has taken a holistic path to resource savings by pairing national media messaging, an interactive pavilion and animated series to reach all age groups, especially children. Instilling efficient water and energy habits in young learners fosters a lasting culture of conservation.

This strategy reflects global best practices for demand-side management and demonstrates how collective participation by public and private sectors can synergize around shared sustainability goals.

ENVIRONMENT MINISTRY LAUNCHES ENVIRONMENTAL PRESERVATION CAMPAIGN IN SAUDI ARABIA

Saudi Arabia's Ministry of Environment, Water and Agriculture launched an awareness campaign that highlighted the paramount importance of environmental preservation and care as authentic Islamic responsibilities during the Hajj season of 1446 AH. It also aimed to enable pilgrims to perform their rituals with ease in a clean and healthy environment. This is in full alignment with Saudi Arabia's Vision 2030, particularly in its goals for environmental sustainability, public awareness, and responsible tourism

The initiative encourages pilgrims to reduce waste, conserve water and respect the natural resources of Makkah and Madinah. It urges government bodies, private organizations and individuals to spread environmental awareness and share responsibility for ensuring a clean, healthy environment for worship.



Uniqus' POV

During Hajj, the focus on community and compassion finds a natural complement in the Hassanah campaign's call for environmental care. When pilgrims adopt simple measures such as reducing waste and conserving water, they extend their spirit of solidarity to the land itself.

The Ministry urged all segments of society to contribute to spreading environmental awareness, protecting natural resources, and reinforcing the concept of shared responsibility towards the lands of Makkah and Madinah. It calls for collective responsibility to make the environment pure and clean.

Supported by faith institutions and local volunteers, the initiative turns personal responsibility into a shared commitment. This blend of faith and sustainability showcases how shared values can protect the holy sites' natural beauty during this unparalleled gathering.



GCC VOWS SOLID CLIMATE ACTION EFFORTS TO GUARD COASTAL COMMUNITIES

The Gulf Cooperation Council (GCC) has reaffirmed its commitment to implement strong climate action efforts to tackle environmental issues faced by coastal communities. Coastal zones of GCC nations are environmentally vulnerable and protecting them is crucial for sustainable development and prosperity in the region.

The GCC countries are investing in modern technologies to reduce the risk of spills and protect the marine environment in the Gulf. These efforts embody a strong commitment from the GCC to achieve the UN SDGs 14 'Life below water', amidst numerous environmental challenges.

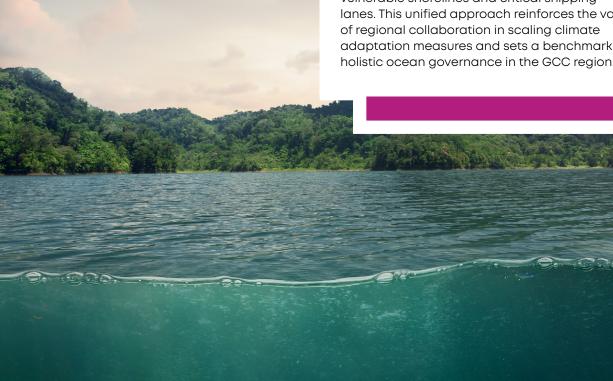
Detailed efforts across all six member states include the establishment of marine protected areas, pollution prevention, sustainable fisheries management, and advancements in marine research and innovation, and investments in modern spill-prevention technologies, data sharing, and early-warning systems to address climate and marine risks.



The coastal areas of the GCC region stand as environmental asset for food security, economic growth and cultural heritage. As such, the Gulf Cooperation Council (GCC) is focused on taking active steps to ensure that environmental issues are mitigated, and meet national and sectoral decarbonization targets, including the International Maritime Organization (IMO) ambitious pathway to achieve net-zero GHG emissions from international shipping by or around 2050.

The GCC's coordinated focus on coastal resilience and ocean health demonstrates a sophisticated ecosystem-based adaptation strategy aligned with UN SDG 14. By combining nature-based solutions, marine research and advanced technology, the GCC is laying the groundwork for a blue economy that balances environmental protection with regional prosperity.

The integration of early warning systems and shared data platforms across multiple jurisdictions enhances risk management for vulnerable shorelines and critical shipping lanes. This unified approach reinforces the value of regional collaboration in scaling climate adaptation measures and sets a benchmark for holistic ocean governance in the GCC region.



IN-DEPTH ANALYSIS

This section delves deep into a significant ESG development, offering comprehensive insights and a nuanced perspective. Join us as we explore this development, shedding light on the opportunities and challenges in the evolving ESG landscape.

CARB WORKSHOP: CALIFORNIA CLIMATE ACCOUNTABILITY PACKAGE

PURPOSE AND CONTEXT

The California Air Resources Board (CARB) held a <u>public workshop</u> on 29 May to initiate stakeholder engagement for California's corporate climate disclosure regulations (SB 253, SB 261, and SB 219). CARB aims to align California's framework with international standards, such as the ISSB Standards, taking into account evolving developments since the original passage of the laws. It also seeks to enhance interoperability and learn from different regions. CARB also discussed additional feedback from stakeholders regarding various aspects of the laws before issuing its official rulemaking decisions, with several proposals clarifying the potential future direction of the regulations. Several focus areas for rulemaking and emerging stakeholder concerns are as follows:

Торіс	CARB Staff Proposal	Stakeholder Concerns and Key Questions to be Clarified by CARB
Definition of "Doing Business in CA"	CARB is considering basing the definition on California Revenue & Tax Code §23101 , with refinements to exclude entities with minimal economic nexus.	Is the proposed definition too broad? Should it include emissions-based or materiality thresholds?
Revenue Definition	CARB is considering basing the definition on California Revenue & Tax Code §25120 (gross receipts), and may reference audited financial statements.	Should interest/dividends (financial sector) be excluded? How to handle complex revenue structures (e.g., subsidiaries)?
Corporate Structure (Parent/Subsidiary)	CARB is considering a Cap-and- Trade "operational control" model (i.e., ≥50% control threshold) to define ownership control.	Should alternative definitions (e.g., legal ownership vs control) be used? How should the rule apply across multinational groups?
Streamlining & Interoperability	The reporting standards will align with the GHG Protocol, ISSB , and existing standards wherever feasible.	Can disclosures be harmonized with SEC, CSRD, EPA, and other standards? How will Scope 3 materiality be addressed?

CARB RULEMAKING FOCUS AREAS AND EMERGING STAKEHOLDER ISSUES

Торіс	CARB Staff Proposal	Stakeholder Concerns and Key Questions to be Clarified by CARB
Enforcement Approach	CARB will apply a compliance grace period in 2026, with no penalties for initial year if good faith efforts are demonstrated.	How will CARB assess "good faith"? What constitutes sufficient documentation?
Scope 3 Disclosure Challenges	CARB supports phased implementation and is open to feedback on materiality thresholds and data availability .	How will disclosures strike a balance between rigor and feasibility? Should estimates or screening methods be accepted early on?

NEXT STEPS AND STAKEHOLDER INPUT

By law, CARB has one year to complete the final rule once the initial proposal of the proposed rulemaking is published. The pre-rulemaking phase is ongoing, with formal rulemaking expected to begin later in 2025. CARB encourages feedback on definitions (e.g., business presence, revenue), suggestions on how to reduce duplicity with existing standards, input on materiality thresholds for Scope 3, and suggestions for effective design of both SB 253 and SB 261 regulations. Overall, public engagement is ongoing, with multiple upcoming events and opportunities to comment. CARB is requesting feedback on its proposals via <u>climatedisclosure@arb.ca.gov</u>

UNIQUS POV: STRATEGIC INSIGHTS AND IMPLICATIONS

California is setting a de facto national standard

With broad applicability and interoperability ambitions given the scope of firms operating in California, these rules may shape how large companies report globally, especially in the absence of US federal mandates. Additional states are following suit, having introduced or proposed climate-related financial risk disclosure regulations, such as Minnesota (SF 2744), New York (SB 3697), and Washington (SB 6092).

Scope 3 is a regulatory frontier in the US

The phased implementation approach reflects the complexity of Scope 3 reporting; however, CARB is moving toward mandating deep transparency across the corporate value chain. This precedent will impact supply chains.

Global alignment is intentional

CARB's coordination with ISSB and monitoring of EU, UK, and APAC disclosure frameworks signals intent to design a globally interoperable and enforceable framework.

CARB is firm on timelines but will exercise enforcement discretion in the first year of reporting

Companies demonstrating "good faith efforts" to achieve full compliance using existing data will not face penalties in 2026. While stakeholder feedback is welcome, CARB appears to remain firm on timelines and legal durability of the rules.

REGULATORY WATCH

Regulation around ESG continues to evolve rapidly. This section summarizes some of the latest regulatory developments across critical global markets, including the US, EU, UK, India, and the Middle East. Our analysis captures the nature of the legislative changes or updates and our high-level assessment of broader implications on business practices and compliance strategies.

Governing Body Update **Uniqus' Impression** GLOBAL EU Parliament and On 13 June, the European Parliament The provisional CBAM agreement Council demonstrates the EU's dedication and Council reached a provisional agreement aimed at simplifying the to enhancing climate integrity while implementation of the EU's Carbon tackling implementation challenges. By Border Adjustment Mechanism (CBAM), simplifying administrative processes and essential for preventing carbon leakage enhancing data traceability, the updated and upholding the EU's climate goals. The framework improves compliance for both revised agreement seeks to ease CBAM importers and regulatory bodies. Crucially, aligning CBAM with the EU ETS ensures procedures by minimizing administrative burdens for importers and authorities, consistent carbon pricing across borders boosting data transparency, and and bolsters the EU's climate leadership enhancing the traceability of embedded role. Nevertheless, global companies emissions in imported products. This exporting to the EU must quickly assess regulation targets high-carbon intensity their emissions disclosure practices and sectors such as cement, iron and steel, supply chain carbon profiles to avoid aluminum, fertilizers, electricity, and financial penalties and sustain market hydrogen. Upon formal adoption, the access. Businesses can ready themselves updated rules will better align CBAM with by performing embedded carbon the EU Emissions Trading System (ETS) and assessments, investing in emissions data support a seamless transition into its full management systems, and collaborating operational phase starting in 2026. with suppliers to achieve complete transparency.

US

California Air Resources Board CARB held a 29 May workshop to gather feedback on SB 253, 261, and 219 rulemaking, with emphasis on global alignment, Scope 3 feasibility, and definitional clarity. See additional information in the in-depth analysis. CARB is staying firm on its regulatory path while laying groundwork for a globally aligned, durable framework despite stakeholder concerns and some implementation delays. See additional impressions in our in-depth analysis in this document.

Governing Body	Update	Uniqus' Impression
New York State Legislature	Two climate disclosure bills—SB 3456 (GHG disclosure) and SB 3697 (financial risk reporting)—were reintroduced but did not pass this session and will need reintroduction in 2026 within the New York state legislature.	New York is closely tracking California's lead, signaling momentum for East Coast climate disclosure laws. While delayed, strong committee support suggests eventual passage and alignment with global standards. However, implementation and enforcement deadlines proposed will likely need to be amended to be pushed back one year.
US Securities and Exchange Commission	The SEC announced it is <u>withdrawing a</u> proposed rule requiring disclosures by investment advisors and funds to provide detailed disclosures around the use of ESG labels, among other proposals. Originally introduced under the 2022 "Fund Names Rule," the measure aimed to prevent misleading marketing by ensuring that ESG-labeled funds invested in line with those principles.	The SEC's withdrawal of the ESG fund labeling rule marks a retreat from ESG disclosure requirements in the U.S. US financial sector. While framed as a move to reduce regulatory overreach, the rollback raises concerns about greenwashing and the consistency of ESG-related investor information. While the proposed rules were already viewed as less comprehensive than those under other jurisdictions (e.g., UK SDR or EU SFDR), global investors and asset managers operating across jurisdictions could face challenges in aligning disclosure practices due to the complete lack of a regulatory regime in the US. Businesses and investment firms must remain vigilant, balancing US deregulation with rising global expectations for transparency, accountability, and alignment with sustainability principles.

INDIA

SEBI

In June 2025, SEBI introduced a new framework for the issuance of Environment, Social, and Governance (ESG) debt securities, excluding green debt securities. This includes guidelines for social bonds, sustainability bonds, and sustainability-linked bonds, mandating compliance with international standards as well as SEBI's NCS Regulations. Issuers are required to disclose the use of proceeds, implement continuous postlisting obligations, and appoint thirdparty reviewers to ensure transparency and prevent "purpose-washing." These measures aim to streamline the issuance process and promote greater investor confidence in ESG debt markets.

This regulatory update is a positive step toward increasing the credibility and transparency of ESG debt markets in India. By aligning with international frameworks, SEBI's guidelines set clear standards for issuers and create an environment that encourages sustainable investment. The emphasis on independent third-party verification and post-issuance disclosures further strengthens the integrity of ESG debt securities, ensuring that funds raised are effectively utilized for their intended environmental and social purposes.

Governing Body

Update

Ministry of Heavy Industries The Ministry of Heavy Industries has introduced the <u>Scheme to Promote</u>. <u>Manufacturing of Electric Passenger Cars</u> in India (SPMEPCI), which encourages global automakers to invest INR 4,150 crore (around USD 500 million USD) in setting up manufacturing plants in India. Companies can also import up to 8,000 fully-built electric vehicles annually at a reduced customs duty of 15%. This scheme is aimed at making India a key player in the global electric vehicle manufacturing market.

Uniqus' Impression

The SPMEPCI policy positions India as a promising hub for electric vehicle manufacturing, attracting foreign investment with incentives like reduced customs duties and clear localization targets. However, the substantial investment and localization requirements may challenge some new entrants. Still, it marks a crucial step towards India's netzero goals and sustainable mobility.



About Unique Consultech:

Unique Consultech is a global tech-enabled consulting company that specializes in ESG and Accounting & Reporting Consulting. The Company is co-founded by consulting veterans Jamil Khatri and Sandip Khetan and backed by marquee investors such as Nexus Venture Partners, Sorin Investments, and other angel investors. Anu Chaudhary, a global ESG specialist with over 20 years of experience, serves as the Global Head of ESG.

With operations in the US, India, and the Middle East, Unique is committed to leveraging technology and an integrated global delivery model to provide best-in-class consulting services that drive measurable results and create long-term value for its clients.

Given the growing importance of disclosures, significant data integrity requirements, and varied and disaggregated data sources, enabling the ESG journey through technology is essential. Tech enablement also helps ensure the integration of ESG programs with core business operations.

With a unique blend of strong ESG domain capabilities and innovative GenAI-based technology, <u>ESG</u> <u>UniVerse</u>, a cloud-based solution, streamlines data management, enhances user experience, and supports organizations in achieving their long-term ESG goals. To learn more about ESG UniVerse, please <u>download</u> <u>our brochure</u>.

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Feedback

We encourage you to share this newsletter with your colleagues and networks, and to provide us with feedback on topics that you would like to see covered in future issues. Uniqus is here to support you in navigating this evolving landscape. Contact us to learn more about how we can help you on your ESG journey.



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