FUELING THE CRISIS:

Defensive Stigma Management Techniques at Elsevier and RELX

RGR COMMITTEE

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> "You have assessed many RELX business activities that work against our climate pledge.
>
> **VP Internal Climate Sustainability Program, Elsevier**[1]

> "Fossil fuel industries have to be shut down as soon as possible.
>
> **Joyashree Roy, independent Climate Advisory Board member**[2]



This is an ELSEVIER/RELX employee group report, created in the spirit of a culture of integrity that asks that we incorporate ethics into all of our actions, grow our business with integrity, speak out for what's right, and hold each other accountable. This report does not intend to disparage individuals fulfilling roles and obligations that have been defined by the Company, but rather to advocate for the removal of constraints placed upon employees that restrict their ability to follow the 'Do the Right Thing' principles, the Operating Principles, and other ethical standards by which we've been challenged to abide. If you have questions, comments, or wish to get involved with our work, please contact Kip Lyall at klyall@cell.com

https://tinyurl.com/RGR-Committee

Highlights

- RELX has concluded that its environmental policies and statements are not false or misleading as a result of business activities that foster new fossil fuel exploration and development—activities that are in direct conflict with the climate goals of those same policies and statements.
- In allowing for the Company to participate in ecocide and the climate change related human rights harms associated with that activity, these environmental policies and statements—as well as other selectively applied ethics-oriented Company polcies—are being utilized primarily as impression management tools.
- The use of misleading CSR (corporate social responsibility) tools at RELX reflects observations in the literature on systemic greenwashing practices at large MNEs and the ineffectiveness of voluntary corporate initiatives in stimulating corrective changes to corporate misbehavior.

Abstract

This report examines the response of Elsevier and RELX to internal advocacy conducted by employees regarding the Company's failures to adhere to its environmental policies and pledges. As a large MNE (multi-national enterprise) with business goals that include the generation of significant production gains for the fossil fuel industry, RELX publishes research that indicates these fossil fuel aims are entirely incompatible with the Company's climate goals. Research also indicates the voluntary policies, initiatives, and communications strategies that RELX has embraced are widely utilized by large MNE's as tools for impression management of stakeholders that enable companies to conceal substantial negative impacts and resist reforms or changes to their operations that would hinder revenue generation. While Company performance of CSR (corporate social responsibility) includes ethics guidelines that prohibit false and misleading statements, the Company has neglected to directly address employee concerns about use of deceptive policies and communications that include the amplification of fossil fuel industry misinformation. The misleading of stakeholders generates a false consciousness regarding CSR, the Company's attitude towards the climate emergency, and the capacity of it and other large MNE's, due to their legal-economic structures, to refrain from business activities that are fueling the environmental crisis that is presently unfolding.

Introduction

RELX has an array of policies and statements (*See: Appendix A*) committing the company to support the rapid reduction of greenhouse gas emissions and minimize contributions to climate change across the business at the scale deemed necessary by science, recognizing the impact of consumer use of our products and services, to meet the Paris Agreement's goal of limiting global warming to 1.5°C. Two reports—*Responsible Growth Reports (RGRs, Reports)*—were submitted to management in April and September of 2021. They analyze company policies and business activities in the light of the current climate science. The scientific consensus indicates there's a 50% chance of achieving the Paris warming goal if there is: 1) an end to all new oil, gas, and coal projects; 2) Roughly 80% of all proven fossil fuel reserves are left in the ground;[3] and 3) CO2 emissions decrease by roughly 7.6% per year between 2020 and 2030.[4] Studies also indicate that the $800 billion the fossil fuel industry is investing in new oil and gas fields just this decade,[5] along with up to 432 new mine projects planned by the world's coal producers,[6] put the world on track to produce more than double the amount of fossil fuels in 2030 than would be consistent with the 1.5°C goal.[7] Based on this reality, Elsevier and RELX business activities that conflict with Company climate pledges include:

> R&D solutions and data services developing strategies to **increase** production for the fossil fuel industry, to expand the industry into previously inaccessible areas, and stimulate global oil production for decades to come.

> Exhibitions and events that cater to extraction industries for the purpose of helping them **expand** global production of new fossil fuel resources, investment in new oil and gas production, promoting offshore exploration and development in the Arctic, and the expansion of the Brazilian biofuels industry into the Amazon.

> REPAC, a Political Action Committee that gives money to politicians that promote the **denial** of climate change, build courts opposed to climate activism, write anti-climate legislation, slash the budgets of organizations researching climate change, block federal actions that would help displace fossil fuels, and give subsidies to the fossil fuel industry that make unproductive fields viable, further locking in fossil fuel dependency and making clean alternatives less competitive.

> Journals, books, and ScienceDirect, which are being marketed as a means for the oil and gas industry to **accelerate** discoveries, and advocate for the scientific and technological development of new petroleum exploration projects—directly inhibiting a safe energy transition. Many authors, editors, and journal board members are employees of fossil fuel companies committing ecocide—the deliberate or neglegent destruction of the natural environment—publishing studies that include advising their industry on fossil fuel development bargaining strategies, investment decision-making, and exploration and development of vast new projects that will lead to climate disaster.

In the hunt for undiscovered fossil fuel resources, "scientific information providers like Elsevier understand [the] challenge and are increasingly seizing the opportunity."[8] Elsevier asserts that there's much to be gained by new technologies that can "help oil and gas companies drive discovery"[9] and locate "hydrocarbon accumulations that we couldn't find before."[10] In fact, the Company claims that helping the extraction industry "find things that weren't found before" is what Elsevier "is good at."[11]

In short: the Company supports a business-as-usual approach that involves accelerating fossil fuel extraction, supplemented by a growth in renewables. This path does not constitute an energy transition that Elsevier's CEO has described as "mission critical"[12] or reflect a business that is Paris-aligned. The Director of Corporate Responsibility (DCR) has asserted that the Company "abides by the environmental policies we set and the external initiatives to which we are signatories," but has done so without providing any evidence or data that refutes the findings in the Reports. It can be concluded that, despite what these policies and statements imply, they do not require adherence to their guidelines—such as refraining from providing goods and services that are known to cause harm and obtaining prior approval from effected publics before products deemed to be potentially hazardous are placed on the market (*See: Appendix A*). Based on the Company's interpretations, RELX's environmental and human rights pledges don't prohibit the Company from committing ecocide or serving and doing business with those that are doing the same. Various environmental and corporate social responsibility (CSR) policies and statements are thus observed to be false and/or misleading, violating the Company's Ethics Code, Operating Principles, and other standards of conduct.

The research community that the Company serves has spoken quite extensively on the environmental, health, and human rights harms associated with some of RELX's business activity. Other areas of research—business, PR, accounting, geography, and so on—have built a robust body of literature around the tools and strategies companies such as RELX employ in order to evade scrutiny and delay reforms that are necessary to curb corporate misbehavior that is inhibiting an equitable energy transition. Along with fossil fuel activity that leaves the Company exposed to greenwashing accusations, the continued use of legitimization strategies that mislead stakeholders and impede environmental advocacy and action could ultimately have a de-legitimizing effect. The observed failures to enforce the Ethics Code, Operating Principles and other standards of conduct—materials that prohibit false and misleading statements and require the incorporation of ethics into all employee actions—demonstrate the misleading nature of these and other CSR-oriented communications that are selectively applied to conform with revenue considerations. Leadership will need to reconsider the use of tools and practices that obstruct corporate accountability, particularly as it pertains to environmental performance, if the Company and its investors are seeking a productive rather than an inhibitory role in an immediate and rapid global energy transition for which they claim to be striving.

Defensive Stigma Management:
Legitimacy techniques in multi-stakeholder governance

Strategic tools are available to organizations such as RELX for managing social pressures and conflicting stakeholder demands[13] in order to give the stakeholders a positive image of the company, achieve or maintain legitimacy,[14] and conceal its primary orientation towards corporate profits.[15] These increasingly seductive claims of the corporation to a state of sustainability are simple discourse mechanisms used to permit the organization to pursue its drives.[16] Legitimizing activities such as those covered below (stakeholder dialogues and communications, policies, reports, events, voluntary corporate initiatives, and CSR/sustainability roles) are tools that can be used for strategic manipulation to sustain corporate operations that benefit executives and owners, forestalling real changes in corporate behavior. Some researchers see legitimizing behavior as potentially quite harmful, particularly if it legitimizes activities that are not in the interests of particular groups within society,[17] continuing the old colonial strategy of reputation management among elite publics at the expense of marginalized publics.[18] Impression management, rather than a mechanism of accountability, is the institutionalization of unaccountability.[19]

A stakeholder is regarded as "any group or individual who can affect or is affected by the achievement of the organization's objective," and can include shareholders, employees, customers, communities, suppliers, governments, and even the environment.[20,21] Thus, large MNEs are political entities with no single path to societal legitimacy[22] and satisfying all of these distinct groups of stakeholders is inherently unrealistic.[23]

Driven by the short-term financial perspective, corporations are also unique, powerful institutions whose first and absolute mandate is to enhance profits for their shareholders. MNEs privileging of shareholders serves the interests of Western "publics,"[24] while giving them the impression that the company has received a social license to operate from marginalized publics.[25] In truth, the interests of a vast majority of the global population—publics that are not seen to be strategic—are ignored (*See: Figure 1*).[26]

A. Corporate hierarchy of publics

Publics	Role	PR agenda
1. Shareholders	Collect profits	Benefit
2. Consumer public	Consumption	Appease
3. Activist public	Resistance	Target
4. Third World workers	None	None
5. Third World poor	None	None

B. PR transformation of core motivations

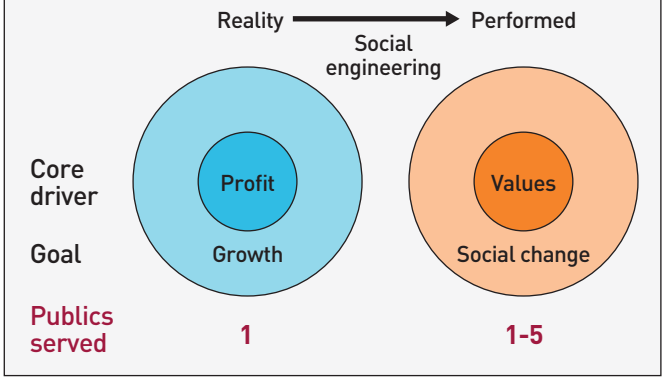


FIGURE 1: CORPORATE HIERARCHY OF PUBLICS
A) (1) the predominantly Western shareholders; (2) the Western consumer public/the global middle-class consumer; (3) the Western activist public; (4) the vast numbers of Third World workers who produce the goods for consumption by others; and (5) the even greater numbers of Third World citizens too poor to consume. The first is obsessive about profits and share values, the second consumes blindly, and the third provides resistance from within the West, while the last two fall below the corporate radar. Corporate PR efforts, therefore, focus on undercutting the protests of the third public to appease the second public and directly benefit the first public. Its agenda has no place for the colonized fourth and fifth publics.[27] B) Business-as-usual does not only need to be engineered physically but requires social engineering as well.[28]

The stakeholder dialogue and reporting process pertaining to the RGR's is extensively documented in *Appendix B*. As reflected in an existing study, "the dice were loaded from the outset, rendering the stakeholder dialogue process one which served perhaps only a symbolic, legitimating function…there has been little thus far to suggest that stakeholder dialogue and CSR [corporate social responsibility] provide fruitful arenas within which to conduct […] political struggle."[29] Stakeholder consultation processes such as these are used to legitimize dominant discourses on CSR by giving the impression that they are the outcome of a democratic dialogue. Rather, they show to advocates the futility of their heresy and thus encourage those actors to adopt the dominant discourse.[30] As has been observed elsewhere, stakeholder engagement here was a reputation damage limitation exercise, a cosmetic ritual lacking two-way, meaningful communication that's meant to deflect attention away from the privileging of financial stakeholders. Despite CSR marketing statements that claim otherwise (*See: Table 1*), non-financial stakeholders are relatively powerless and effectively ignored.[31] After neglecting to follow guidelines of the Reporting Policy, Ethics and Compliance officers have pointed to 2 non-substantive calls with corporate responsibility (CR) representatives as being indicative of the issues having been addressed and resolved. However, roughly one year after senior management was presented with extensive documentation regarding business activities that conflict with policy-marketing statements, no evidence has been presented to refute any findings in the Reports, offer evidence of the full policy compliance that's being claimed, or describe what Company environmental policies actually prohibit. Multiple requests by RGR Committee members asking the Company to align policy statements with business practices have not been embraced and no known changes have been made to the highlighted aspects of the business—even in cases where the business, partners, and customers are complicit in supporting ecocide and even genocide (*See: Appendix B*).

DSM-style communications

Defensive stigma management (DSM) communication strategies observed in the reporting process outlined in *Appendix B* include deception/non-disclosure, deflection, dissociation, denial, and disengagement. These tactics have become especially important for companies operating in extractive industries.[32] The capacity of these businesses to modify discourse is considerably greater than their capacity to improve their social and environmental impacts.[33] Their use of the "post-truth" application of the empty terms "sustainability" and "sustainable energy transformation" in regards to enacting an "energy-mix" enables such traditional actors to exploit the green growth discourse and thereby reinforce their own vested interests.[34,35] RELX exploits such deceptive communications, amplifying extraction industry disinformation pertaining to their plans for an "energy transition"[36] in order to justify continuing to work with companies that are being sued for their resistance to climate action:

Director of Product Management (Geofacets): "Geofacets is working and helping Mining and O&G companies to transition from pure Hydrocarbon producers to Energy producers."

Elsevier internal climate board (ICB) member: "[We] look for ways we can tangibly help customers in carbon intensive industries accelerate their clean energy transition."

ICB member: "Our focus is on helping them [coal companies] in this transformation, rather than disengaging."

ICB member: "The energy industry is already heavily motivated to make the transition by combinations of shareholder and government actions. We have been working with the Energy industry to provide them tools for this transition."

Elsevier experts and publications contradict these claims that the industry is "highly motivated" to transition. The evidence shows Big Oil is trying to create the impression that a large and growing oil industry is compatible with preventing runaway climate change.[37] These companies are in fact crippling the ability of nation states to decarbonize, motivated by a strong financial and political incentive to undermine global efforts to reduce the carbon intensity of the energy sector. They're increasingly preoccupied with ensuring that fossil fuel dependency is maintained as threats to their hegemony have grown, using tactics have been borrowed from Big Tobacco to dominate government climate and energy policy, weaken regulatory oversight, and entrench their incumbency.[38] The industry is successfully lobbying and suing governments to prevent effective climate action.[39] A 2021 Elsevier paper compared oil majors to "Horsemen of the Apocalypse," due in part to compensation packages for CEOs being linked to exploration of new fields, increased extraction,

TABLE 1: DSM-style communication strategy: deception

CSR PR statements

Publics served

"There isn't one stakeholder that we prioritize over another…Walking the talk is really critical to us.

Márcia Balisciano, Director of Corporate Responsibility (DCR), RELX

Serving society

"[Elsevier is] guided by our independent Climate Advisory Board.

Elsevier CEO

"Fossil fuel industries have to be shut down as soon as possible.

Joyashree Roy, independent Climate Advisory Board member

Reality

"[A RELX rep] voiced concern about publishers boycotting or "canceling" oil and gas firms.

The Guardian, February 24, 2021

Serving investors

TABLE 1: DSM-style communication strategy—deception
Performed values are communicated in a way that demonstrates a willingness to consider all publics (from FIGURE 1) above investors.

and the ongoing promotion of fossil fuel demand through lobbying and government subsidies.[40] While RELX promotes a growth in renewables—such as with Shell-sponsored "green" energy conferences[41]—the Company continues, like Shell, to support an ecologically disastrous business-as-usual approach to fossil fuels.

The claim that Elsevier is engaged with these companies for the purposes of helping them transition is also contradicted by Elsevier's business reality: with more known reserves that can safely be burned, the Company promotes ScienceDirect, journals, books, data services, and applied R&D as playing a "critical role" in enabling the expansion of the fossil fuel industry into "riskier, more remote areas that had previously been inaccessible" and empowering customers to "dig deeper and discover more." Elsevier aims to see the industry open up ultra-deepwater development, expand exploitation of tar sand deposits, and unleash the "the petroleum potential of the Arctic… the last major frontier for conventional oil and gas exploration." (*See: Previous RGRs*)

The use of deception to maintain business-as-usual was recently observed in a February 25, 2022 Cell Press Town Hall meeting, the day after a story was published in The Guardian about the Company's fossil fuel work. The Managing Director of STMJ (Elsevier journals) wrongly framed the issue as being about a call to immediately stop using fossil fuels, rather than business activity that ignores the scientific consensus that new fossil fuel projects are incompatible with a sustainable planet:

> **"Some of you may have seen the Guardian article. Some of our colleagues kind of are concerned about our activities around oil and gas. Um, I do think within STMJ we can, um, take, it's not, I mean, it's not that we, you know, I think that also our oil and gas journals serve a purpose. Um, we cannot, kind of, do without fossil, um, fuel, um, you know, uh, right now, there [are] not alternatives. But we can play a role I think at STMJ to be more proactive on those journals. And not just, I mean, on the broader energy titles, for example, how do we see that? How do we see that in terms of aims and scope that need to evolve over time, the composition of editorial boards, etc. So, I do think from that perspective there's a role to play. Um, and I also encourage you to come up with other ideas. But we have to play a proactive role."**

Non-disclosure and deflection are also strategies aimed at investors. At the 2017 RELX AGM,[42] an attendee attempted to address the Company's failure to follow its environmental policies:

> **"[The speaker] noted various policies on environmental impact through operations and the supply chain but had not found any evidence of RELX taking actions or having targets in the area where RELX could have had a potentially negative impact on costumer use of its products and services. She wanted to know if RELX had such targets and if RELX intended to define such targets."**

The reply pivots away from the issue of policy adherence, while at the same time inaccurately claiming customer use of products and services doesn't have a significant environmental impact:

> **"It was actually mostly RELX's own activities which needed to be focused on, including for example the travel of RELX people getting to work. The realisation from that study was that it was important to focus on things where RELX could actually make a significant difference. Mr Nick Luff explained that that was why RELX focused its efforts there rather than trying to measure what exactly the customers did with the products"**

Additional observations regarding the use of DSM-style communication for impression management of stakeholders is documented further in *Appendix C*.

Policies

Company policies (*See: Appendix A*) are covered extensively in the previous RGRs. These include the Company's pledge to refrain from providing goods or services that the Company knows will cause harm, and to seek to prevent or mitigate "an adverse impact where [we] have not contributed to that impact, when the impact is nevertheless directly linked to [our] operations, products or services."[43]

Elsevier has now introduced a new "Climate Emergency Statement" that indicates "we are committed to prioritizing climate action within our business using a data driven approach, advised by an external Climate Advisory Board that help to guide our actions."[44] The Company has yet to act in the spirit of one Climate Advisory Board member's call for the fossil fuel industry to be shut down.[45] (*See below: CSR/sustainability roles*)

RELX has concluded it is in full compliance with its environmental policies, which means that these policies in no way restrict or prohibit the Company from engaging in activities that are fueling climate change and making the aims of those policies impossible to reach. These business activities render RELX environmental policies and statements to be highly misleading, and are therefore in violation of Company ethics guidelines and Operating Principles. These ethics guidelines prohibit any employee from making false or misleading oral or written statements or omissions about products and services, to comply with all Company policies, and "incorporate ethics into all our actions." Aspects of these ethics policies are being selectively applied for impression management, with no consequence for observed examples of non-compliance. RELX's Chief Ethics Officer even conceded that the Company's choice to have a political action committee (PAC) constitutes a violation of RELX's Inclusion and Diversity Policy, on account of its exclusionary nature, but no action has been taken to address this word-deed misalignment. Both environmental and ethics guidelines can be regarded as DSM tools that do not operate as effective means for preventing corporate misbehavior, but are in fact are being used to perpetuate it.

Reports and presentations

A growing body of research demonstrates that companies engage in social and environmental reporting mainly to secure their own position and private interests.[46] With room for discretion slight compared to the pressures upon it to deliver short-term financial return, they offer no threat to corporate attitudes and activity. Most business reporting on sustainability and much business representative activity around sustainability actually have little, if anything, to do with sustainability.[47] Such reports have been described as a cosmetic showcasing of good deeds[48] and primarily rhetorical descriptions of "powerful fictions" and "fairy tales to help the children sleep at night."[49] As one paper asked, "Why would any corporation voluntarily wish to admit that it is probably contributing to humanity's exceeding of the ecological carrying capacity of the planet?" A corporation is unlikely to declare the full scale impacts it has on planetary sustainability within a system which not only penalizes non-economic activity, but also expects corporations and their managers to pursue and deliver short-term financial gains.[50]

Institutional pressures and the shareholder-value orientation compel organizations to develop façades, severely limiting the prospects that sustainability reports will ever evolve into substantive disclosures. Selective, incomplete, and/or biased disclosures are a process of identity transformation that can

lead stakeholders to make erroneous assessments of organizations. Through omitting negative information and highlighting positive impacts, organizations seek to appear socially responsible and environmentally friendly, failing to address the fundamentally unsustainable underpinnings of their operations.[51]

There's been an increase in social, environmental and sustainability reports by businesses like RELX that are involved in the extractive industries because they work: such companies are now considered to be global leaders on social responsibility and sustainability.[52] While organizations may technically present truthful information, omitting significant pieces of information and presenting only half-truths provide firms with the necessary latitude to make self-laudatory statements in an attempt to influence the public's perception of their operations.[53] The larger companies in particular tend to avoid negative words,[54] overemphasizing events or activities they were proud of and concealing activities that are destructive—such as oil exploration.[55]

RELX's reports and presentations are reflective of this reality, omitting all references to business goals that run counter to environmental goals, leaving employees, investors, and other stakeholders largely unaware of these activities. The 2021 Corporate Responsibility (CR) investor presentation promoted the Company's commitment to responsibility as "inherent to the way we do business." It made no mention of the Company's business goal of furthering fossil fuel exploration projects, something that would be of particular importance to an audience the Company acknowledged as being concerned with investing responsibly.[56]

TABLE 2: Statements and omissions in the 2021 CR investor presentation

Statement	Omission
[Corporate responsibility is] owned by our more than 33,000 people across the business.	RELX CR is controlled by leadership, which has taken no concrete steps to address the greenwashing concerns of employees; employees are misinformed by the Company regarding business activity and what the Company considers to be environmentally responsible behavior, inhibiting their ability to effectively "own" CR.
Just some of the things we have done include introducing a Do the Right Thing culture of compliance initiative.	Based on the dismissing of employee concerns, this initiative—which requires employees to incorporate ethics into all our actions, grow our business with integrity, and hold ourselves accountable—is not being followed.
The Book Chain project...helps us track the sustainability of the paper used in our print-based products.	Sustainable paper is being used to print books that inform the expansion of fossil fuel production and serve businesses that promote deforestation.
We embedded [the UNGC's] 10 principles related to human rights, labour, environment and anti-corruption into our Code of Ethics and Business Conduct.	Elsevier publishes research which has discredited the UNGC as unenforceable and ineffective in correcting corporate misbehavior. (*See below: Voluntary corporate initiatives*); the former Managing Director of Elsevier's journals division acknowledged that the Company is not UNGC-compliant (*See: Appendix C*).
Since 2017, we've also held an SDG Inspiration Day to bring stakeholders together to scale action on the SDGs... A special guest will be Nobel Prize laureate, Muhammad Yunus.	Muhammad Yunus is a signatory to the Fossil Fuel Non-proliferation Treaty and has stated that "fossil fuels are the greatest contributor to climate change. Allowing the continued expansion of the industry is unconscionable."[57]
We publish a broad range of journals supporting research into climate change and energy efficiency.	Elsevier is the largest book publisher for an expanding oil and gas industry.
We track our environmental performance across energy usage, carbon emissions, waste, water and paper...for business travel within Scope 3 we achieved carbon emissions of net zero.	While this is accurate, the Company is not following pledges made to employees and investors to consider the use of products and services (Scope 3) as part of the Company's environmental assessments.

TABLE 2: Statements and omissions in the 2021 CR investor presentation
A CSR marketing-oriented communications strategy gives responsible-minded investors an incomplete picture of the Company.

The 2021 RELX CR Report acknowledges that "a small proportion of our customers operate in carbon intensive industries, and a small number of journals (less than 1% of the total) cover fossil fuel industries. We are committed to continuing our efforts to support these customers in their energy transition."[58] What this statement omits is: 1) These customers, enriched by RELX's business with them, are largely engaged in preventing an energy transition; 2) RELX's efforts include publishing calls for fossil fuel companies, universities, and research institutes to "work together…for deep oil and gas exploration and development" in areas that have "vast exploration potential";[59] and 3) RELX has policies that, if effectively implemented, would prohibit these activities.

Among other things, these Company reports are used to generate the impression that the Company is acting on the "need to accelerate our progress"[60] while omitting the Company's goal to accelerate fossil fuel discoveries. Corporate reports never tell the audience what happened behind the scene, i.e. what is really going on inside the company,[61] and conceal the exploitative aspects of global businesses. Stakeholders with environmental interests cannot rely on sustainability reports for their decisions.[62]

> "The business-as-usual approach to fossil fuels that RELX favors does not only need to be engineered physically but also requires social engineering.

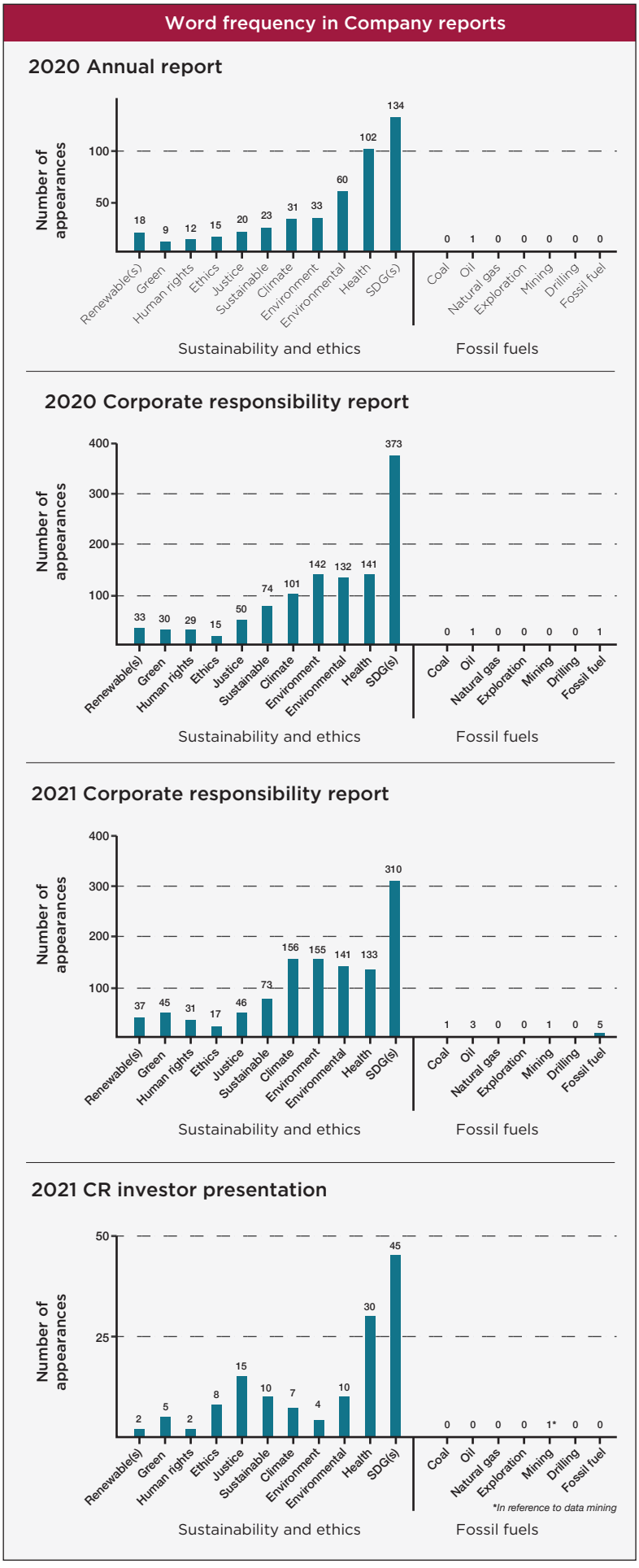


FIGURE 2: Word frequency in Company reports
Company reports and presentations make no mention of the Company's business goal to successfully serve and expand the oil and gas industry's fossil fuel development plans.

Events

RELX's 2021 SDG Inspiration Day: "Mobilising Business for a Better World: Accelerating Business Action on the SDGs"

The RELX SDG Inspiration Day was held virtually on Tuesday June 22, 2021. It was billed as "a series of engaging, interactive and stimulating events,"[63] emphasizing that "the role for businesses to accelerate the SDG's is needed now more than ever."[64] The event featured "innovators, thought leaders and sustainability professionals to mobilize business action on the SDGs." It was notable for internal and external speakers whose statements were firmly at odds with the company's business practices (*See: Table 3*).

Climate reality

> "[Oil majors] can only drill about half of the materials they already own

External Climate Advisory Board member, Elsevier
April 1, 2022

Business reality

> We are addressing one of the most challenging areas of the oil and gas industry: new venture projects and how to make them a success

Elsevier webinar: "Making New Venture Exploration More Successful"

TABLE 3: Ethical free riding (No. 1)

Performed values	Business reality
Customer Award Winner Saman Zia-Zarifi, Secretary General of the International Commission of Jurists: "Our colleagues today, lawyers and paralegals that work directly with the ICJ...[are] trying to defend against the [Myanmar] military...Our colleagues are working right now to make sure that to the extent possible even under the threat of military retaliation." The ICJ released a report in March 2021, saying "Adani Ports' record in Myanmar is a shocking account of the pursuit of profits ahead of commitments to respect human rights."	Based on business activity, RELX does not consider these human rights atrocities above the profit motive. Adani (now Bravus), to whom RELX provides services that Adani/Bravus describes as "vital,"[65] has a US$290m commercial deal with a company controlled by the Myanmar armed forces, which have been accused of committing genocide.[66] The Director of CR was informed of this in July 2021, but the business relationship has continued.
RX CEO: "It's not true that businesses today simply focus on profitability...you simply cannot operate a strong, functioning business in a world of inequality, poverty, climate change, and nasty things."	Based on business activity, RELX does not hold this view; CR considerations are restricted by the profit motive; RX serves customers that are being sued for human rights crimes and that are commting ecocide.
Chairman (Elsevier) and Director of Corporate Affairs: "We all have the duty to protect the most marginalized."	Elsevier serves 60% Fortune 500 oil companies,[68] businesses that are locking the planet into a future of extreme warming. The effects of climate change "are not distributed equally. They disproportionately affect marginalized communities: the poor, the vulnerable, and the disadvantaged."[69] (*One Earth*)
Mick Sheldrick (of Global Citizen): "Ultimately we have to commit to an actual [GHG] reduction. 40% by 2030." The Global Citizen website states "corporations [are making] their 2050, 2035, 2030 pledges without looking at what's happening right now."[67]	RELX business activity runs counter to this need for an immediate reduction in global GHG emissions this decade.
Keynote speaker Muhammad Yunus, who has declared "allowing the continued expansion of the [fossil fuel] industry is unconscionable"[70]: "Our house is burning but inside the burning house we're celebrating our successes and businesses' high growth rates blooming...We are celebrating but the house itself is burning."	RELX has a business goal to expand the production of the fossil fuel industry.



TABLE 3: Ethical free riding—Value-based virtue signaling vs. commercial-based activity (No. 1)
Giving awards and platforms to individuals whose virtuous statements and activities contrast with a company's commercial pursuits is what the literature on CSR describes as "ethical free riding." Prior to being given a customer award, Sam Zarifi's organization released a report that says RELX customer Adani (Bravus) is financially supporting and "contributing to the devastating damage the military has inflicted on Myanmar... Financial isolation of the military is crucial to ending the Myanmar military's human rights abuses."

Elsevier's Sustain Festival

Sustain is an Elsevier-run employee sustainability group. Those at the initial group proposal meeting in April 2021 emphasized the need for the company to address environmentally destructive activity that is tied to revenue. At a subsequest *Sustain* meeting, leadership demonstrated its desire to frame and control the debate when one of the members from the Internal Climate Board discouraged any individual environmental advocacy at the Company. By the time of the virtual Sustain Festival[71] in November 2021, despite being billed as a forum for debate, addressing questions pertaining to the Company's work promoting fossil fuels was actively avoided. During a panel called "Climate Justice,"employees submitted at least 4 questions pertaining to RELX's negative impacts. Despite no time constraints, none of them were addressed:

> Our company provides the coal company Adani with resources that they describe as "vital" to their business. Adani is currently opening the largest proposed expansion of coal mining on Earth that will destroy Indigenous homelands, and it has a $290 million commercial deal in Myanmar, helping to prop up a military regime accused of genocide and crimes against humanity. Our company says that we're meant to address any negative human rights impacts with which we may be involved either through our own activities or as a result of our business relationships. What do you think our company should do to fulfill this obligation?

> Our company has thrown its support behind enhancing the current exploration and production goals of the fossil fuel industry, through our R&D, data services, exhibitions, publications and so on, particularly as it comes to helping the industry expand into new areas. Our company also claims it's in line with the Paris agreement. Do you think this claim is valid?

> The scope of our business encompasses an explicit support for expanding the current production aims of fossil fuel companies. One study projects the lack of an immediate transition in those plans will lead to premature deaths of 150 million people from air pollution alone by 2100, a majority being in vulnerable and underrepresented populations. Do you think this business activity demonstrates a genuine interest in climate justice?

> How do we hold our company accountable for bad-faith dealings with heavy polluter companies such as the oil industry while claiming internal "net zero" goals?

One Sustain Festival presentation was the screening of the film *Our Planet: Our Business*, which depicts business as climate savior. In framing the climate crisis as a marketing opportunity, the film indicates that if businesses "want to win over millennial customers and attract the $30 trillion dollars of capital that's currently being given to millennials by the baby boomer generation, [business are] going to have to have a narrative around how [their] products are sustainable and healthy. [They're] going to have to have an impact story as well."[72] As with the SDG Day, the Company attempted to reinforce its own green narratives by inviting speakers whose work and statements contrast heavily with the scope of RELX business practices (*See: Table 4*).

TABLE 4: Ethical free riding (No. 2)

Performed values	Business reality
Prof. Kimberly Nicholas: "Fundamentally, we have to keep fossil fuels in the ground... life on Earth really does depend on how fast we can do this... There is just no room in the carbon budget to extract any more fossil fuels, and especially coal, so I think there is no valid argument for doing that...the International Energy Agency, IPCC, and every other alphabet soup of analysts is saying that, 'Nope, there's no more room for fossil fuel expansion.' We're living right now in this world of cognitive dissonance and disagreement because we're see things like expansion of coal at the same time governments saying they want to pursue 1.5, and those two things are just not compatible."	Based on business activity, RELX is not moved to see the world stay within the carbon budget discussed here.
Jonathan Leggett: "Greenwashing is a really big issue... I went up to them [SSE, an energy firm] and I was like, 'This sounds great. It's fantastic that you're doing these big investments in wind power. Does this mean you're going to be reducing your fossil fuel extraction in the North Sea as well?' And they were like 'Oh, God no.' That was their reaction. They just don't even think about the fact that they can be talking about these great things but actually the profit motive that they get and the profit they receive from these really destructive forces still comes first."	Based on business activity and inaction resulting from greenwashing concerns, RELX does not consider greenwashing or promoting destructive energy projects to be issues that need to be addressed within the scope of its business.
Assistant Prof. Paul Behrens, criticizing carbon intensive businesses: "Businesses that are harder [to decarbonize], they don't do the structural efforts ...[or] change in the systems that they operate in ...You don't see the fundamental changes. This is ultimately a power issue. You can put it in all the accounting standards that you like, but if they're not transparent because there's a power issue, they're not going to happen."	RELX is uncritical of carbon intensive businesses it serves and elevates industry disonformation about their "transition"; lacking transparency, business activity that is fueling a future of extreme warning is not mentioned in Company reports.
Prof. Kimberly Nicholas:"No one can say are we really going to make this happen, can we do what it takes, are we going to make it in time? No one knows the answer to that. But it is possible, and it really depends, scientifically, it really depends on what humans make possible in the next few years."	Based on business activity, RELX does not believe substantive action is needed in the next few years; the Company intends to continue serving business-as-usual fossil fuel production.

TABLE 4: Ethical free riding—Value-based virtue signaling vs. commercial-based activity (No. 2)

The Sustain Festival opening presentation (*"Kickoff: What Does Sustainability Mean to Elsevier?"*) allowed for the submission of questions that could be viewed and voted on by attendees. The most popular question (*See: Figure 3*) concerned the documented ineffectiveness of the UN Sustainable Development Goals (SDGs). The SDGs were a topic that was extensively promoted in the presentation, and, despite no time constraints, the question went unanswered:

> **"Thank you both for this presentation. Observers have noted one reason none of the SDGs are on track is that companies engage with the SDGs by pointing to existing business activities that can be framed as aligning with SDGs, but it does not compel companies such as ours to discontinue activities that make SDG achievement unattainable. How can the SDGs be achieved given this flaw in the framework?"**

A moderator stated that "if we didn't get around to answering your question, we'll be sure to reach out," but there was no follow up. Directly addressing the failures and deceptions embedded in voluntary corporate initiatives would compromise their effectiveness as tools for impression management—an area of DSM that will be explored next.

Voluntary Corporate Initiatives

Sustainable Development Goals (SDGs)

The UN-backed SDGs are a collection of 17 interlinked global goals designed to be a "blueprint to achieve a better and more sustainable future." Research indicates that companies treat the SDGs as a largely symbolic scheme with non-committal implications, facilitating non-substantive impression management.[73] Businesses strategically emphasize specific goals, compromising a more integrated substantive approach to sustainability grounded in the needs of those affected.[74] Companies seem to simply remap their existing efforts to the SDGs, rather than making impactful changes to the business that would contribute to them;[75] a recent study of the 100 largest global firms revealed that such efforts mainly consist of cosmetic greenwashing, stating that firms' existing business goals had merely been relabeled as CSR initiatives.[76] This mapping behavior is seen at RELX, which has "luckily" discovered it has business activities it can report are aligned with some SDGs.

> **2017 AGM transcript:** **"RELX focused its efforts there rather than trying to measure what exactly the customers did with the products, which was quite difficult...RELX adopted [the SDGs] and had looked at how what RELX did aligned to [them]."**

> **2021 CR Report:** **[The company] conducted mapping of more than 200 RX events which indicated over 90% covered SDG Themes.**

> **Email to Elsevier Internal Climate Board (ICB) member (excerpt):** **"Elsevier publishes a lot of content which has the specific purpose of speeding the expansion of new oil and gas exploration. Would you mind sharing your thoughts on why Elsevier can claim compliance with the Paris Agreement?"**
>
> **Reply (excerpt):** **"We can help research leaders, funders and policy makers, by mapping all research content to the contribution of SDGs, which we are doing. Luckily, we see research in areas that positively contribute to SDGs, such as cleaner production or energy, rapidly growing."**

Although they cherry-pick the SDGs, companies tend to communicate that they have 'adopted the SDG framework' or 'subscribe to the 2030 Agenda,' leading skeptics to label such behavior as rainbowwashing, in reference to the SDG

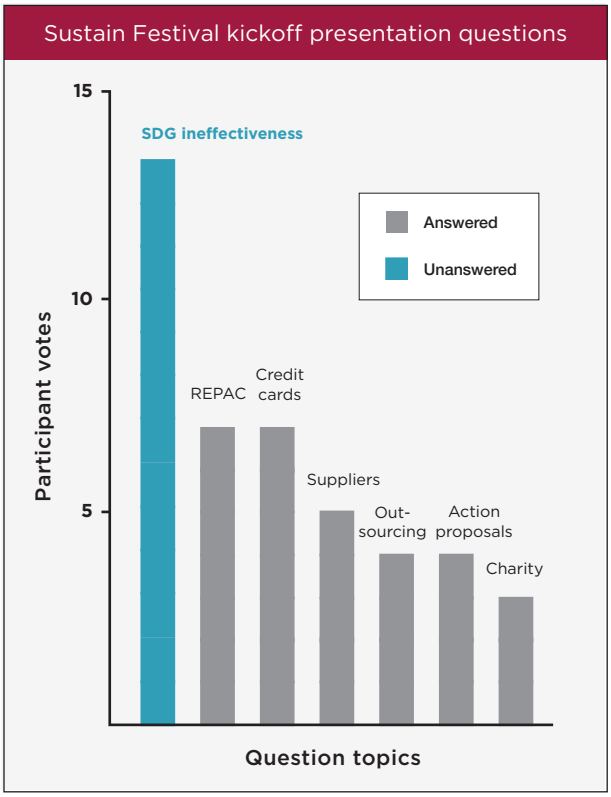


FIGURE 3: Sustain Festival kickoff presentation questions
Questions that challenge Company sustainability narratives are avoided.

colormap.[77] Businesses focus on goals that improve their profit while avoiding goals that may draw attention to problematic practices and systemic power relations that it is not in their interest to change. They operationalize and market SDGs that best serve their interests, while ignoring core issues of unsustainability.[78] RELX's exhibitions division, RX, for example, points to SDG 7 (Affordable and Clean Energy), SDG 11 (Sustainable Cities and Communities) and SDG 12 (Responsible consumption and production) as SDGs it supports, despite being engaged in fostering business communities and MNEs that promote and produce the world's dirtiest energy resources, destroy indigenous communities, are being sued for human rights crimes, and are working to impede a clean energy transition.[79] As the deputy director for the UN department of global communications has said, "any actions actively supporting the expansion of fossil fuel development are indeed inconsistent" with the United Nations' sustainable development goals.[80]

The SDGs reveal a fundamental flaw of business—emphasizing self-interest at the expense of society.[82] With no standard for reporting, the SDGs remain unproven with few successful examples of where they've been successfully adopted.[83] If the aim is to achieve the SDGs by 2030, the dominantly symbolic legitimization strategies RELX promotes are insufficient.[84]

> "Companies consider the SDGs like the Global Compact: a non-committal scheme, facilitating impression management.
>
> *Corporate involvement in Sustainable Development Goals: Exploring the territory*
> **Journal of Cleaner Production (Elsevier)**[81]

SDG Publisher's Compact

Elsevier is a founding signatory to the SDG Publishers Compact, "a voluntary commitment that recognizes the responsibility of the publishing industry to create a sustainable future through action....and gives publishers the opportunity to mark their commitment with clear targets for them to aim for."[85] However, the only mention of targets in the list of voluntary commitments of signatories is to incorporate the "SDGs and their targets as appropriate," while it mentions *promote*, *promoting*, and *promotions* in the 10 commitments 7 times—activity more associated with marketing than enforcement of substantive changes.[86] The Compact encourages the publication of "books and journals that will help inform, develop and inspire action" but does not prohibit Elsevier, the world's largest publisher for oil and gas content, from publishing material that informs the business-as-usual growth of that industry.

U.N. Global Compact (UNGC)

RELX is also a member of the United Nations Global Compact, a voluntary initiative for implementing sustainability principles.[87] But the literature indicates that, being an instrument without certification or audits,[88] "companies adopt UNGC (only) to improve corporate image and reputation."[89] One paper found that members fare worse than nonmembers on costly and fundamental performance dimensions, while showing improvements only in more superficial dimensions. Exploiting the lack of monitoring and enforcement, UNGC members enjoy goodwill benefits of program membership without making costly changes to their human rights and environmental practices.[90] For example, RELX continues to market itself as a UNGC member despite failing to implement, among others, the UNGC pledge to "obtain prior approval before certain products, deemed to be potentially hazardous, are placed on the market."[91]

The company's UNGC self-assessment indicates that the CEO leads the executive management team in overseeing implementation. It also indicates RELX made "sustainability criteria and UN Global Compact principles part of goals and incentive schemes for [the] CEO and executive management team."[92] This implies that, in addition to the risk of tarnishing the carefully crafted corporate image, the CEO conceding that the company is not in compliance with UNGC guidelines would deprive those in management of these incentives—a clear conflict of interest.

RELX is in fact a LEAD member of the UNGC, but LEAD companies have been found to be no more transparent than other organizations. UNGC LEAD members actually demonstrate a low propensity to disclose information about significant negative events in their sustainability reports, as the disclosure of information on negative events could jeopardize LEAD companies' best-in-class image.[93] Another study provided a list of various human rights violations perpetrated by MNEs from 2002 to 2017, verifying 273 violations by 160 MNCs mostly from developed countries. More than 90% of sample firms have CSR/sustainability committees and are signatories to the UNGC.[94]

One Elsevier paper labeled the Global Compact "another toothless voluntary initiative": it is not transparent, has ten very broad principles, no verification of compliance, and even "devalues the UN's name."[95] It's meant to help businesses assess the performance of their practices and procedures and policies against SDG indicators, but it falls short of helping companies diagnose the proximate and systemic causes of poor performance or diagnose barriers/constraints preventing a company from being able to change their practices.[96] While guidelines emphasize the *prevention* of harm, the UNGC's membership includes companies that have done the most to cause and impede action on climate change, such as BP and Shell. Shell has responded to a lawsuit brought by investors for its inaction on climate by fighting the lawsuit, not by altering its business in ways that UNGC membership would imply. The ineffectiveness of voluntary corporate initiatives like the UNGC in bringing about substantive changes in adherents is further demonstrated by SDG champion and UNGC LEAD member RELX remaining similarly engaged in increasing the amount of fossil fuels available for the world to burn—activity that "drags us towards disaster."[97]



> "Companies adopt UNGC (only) to improve corporate image and reputation.
>
> *The impact of the United Nations global compact on firm performance: A longitudinal analysis*
> **International Journal of Production Economics (Elsevier)**

CSR/sustainability roles (Boards)

Elsevier points to their internal and external Climate Advisory Boards to promote the Company's green credentials. But one former member of the internal Board, Richard Horton (*The Lancet*, Editor-in-Chief), describes the internal Board as "a corporate greenwashing initiative" that he stepped down from after learning about the Company's political activities: "The fact is that having a PAC and paying money to climate deniers/sceptics is a corporate choice. No one forces RELX to have a PAC. I still don't see how RELX can claim to be a supporter of climate action while engaging financially and politically with anti-science advocates." The 16-person internal Board—despite members with titles that include the words "sustainability" and "environment"—consists of employees whose backgrounds are in communications, business, law, and publishing.

The Company also promotes its independent, external Climate Advisory Board as demonstrating that the Company is being guided by climate experts that "prioritize our actions,"[1] "identifying key challenges"[2] at the Company. In meeting with members of the RGR Committee to discuss the external Climate Advisory Board's work, a Board member indicated that the Board doesn't really set the priorities: Company employees meet with the Board quarterly for about 90 minutes to generate recommendations on challenges that the Company has prioritized, which thus far have focused on servers, paper, travel, and equipment lifecycles.

The Board member expressed their appreciation for being able to discuss at the previous meeting a recent Guardian article which focused on the Company's work with fossil fuels. "I think we talked 10 or 15 minutes about the Guardian article, that was about it…That we could discuss it, that we could hear some warnings. For me it remains to be seen what we do with it." They added, "That [the RGR Committee] exists, is a sign of it: that this is a very important discussion for Elsevier. You just can't walk away from it. That is for your reputation, how you handle these kind of things."

Regarding the group's focus, the Board member said, "if the goals are serious, then I think, all right, you've basically focused in on the SDG of climate action, and not on poverty eradication or income inequality and all these kind of things that are so embedded in our society at the moment—where, like I said, maybe Elsevier is not really a very good contributor to these kind of goals. But OK, this is climate. And if they find ways to reduce their carbon footprint by 2030 and become carbon neutral by 2050, then that is pretty OK…I think they are trying to make a real effort to meet climate goals. That is my take at the moment. It's limited, there's one SDG—there are a lot of things you can think about Elsevier and the business model. That is not in the scope of the group at this point."

The following are answers from the Climate Advisory Board member to questions posed by RGR Committee members:

Q: What are the possibilities and limits of the external board for changing policy? Especially in the face of the pressure on all multinationals to deliver for their shareholders, can the board effectively influence policy? What would the board need to become more influential?

A: I don't think you want to overestimate what Elsevier wants to do with this climate board. They basically have set themselves a goal that the carbon footprint of their operations has to be reduced by 50% by 2030 and they want to be carbon neutral by 2050. That's the plan. That's a self-stated goal. And I think they want to have this advisory board to see what is the best way of realizing this, or am I maybe hiding that I'm not realizing it? Or do I miss things? That is the way I see it.

Q: On the topic of research or publications on fossil fuels, which you say aren't necessarily inappropriate, and I'd agree. Where would you draw the line? Is there a difference between knowledge produced about fossil fuels, oil production, and the industry vs. knowledge whose justification is to help the industry develop new and old reserves?

A: Yeah, that's an actual debate and I think a very short debate. You probably know the book, *The Merchants of Doubt* [about how a few scientists obscured the truth about global warming and other issues]. That is a very famous one. That is the whole thing where I see things going wrong. If you contribute to basically greenwashing, to creating fuzziness, all these kinds of things. If you would do this at Elsevier, if you would promote it, then I would not be very happy. I would speak of it to the advisory board and if you see it's a company like that then, probably, I would quit. You probably all know that the proven reserves of fossil fuels are already so much that if you burn it all then you will never make any Paris climate target.

Q: With regard to publishing content that is relevant to the fossil fuel industry, but at the same time restricting it in terms of its scope. Meaning, Elsevier would be willing as a company to publish information that would help reduce the carbon footprint, but we would not be in favor of publishing information that helps the fossil fuel industry increase its drilling…I'm an editor at Elsevier and I believe editors have a prerogative with regard to the scope that they which to publish—they can generate the scope. It seems to me this is one way at Elsevier, a direction Elsevier could go with regard to publishing studies from the fossil fuel industry, to set an editorial scope. And say we will invite this information, but we won't invite this other information. Is that censorship?

A: Let's put it this way: if you look at a single journal, or Elsevier as a whole, you [can] make very clear where you stand. And of course, then you have to work it out… it is clear that anything that looks like greenwashing or promoting things that are clearly not compatible with 2 degrees or 1.5 degree scenarios, then we say, "Well, no, sorry, that is not the technological future or the social-technical future to which we as a company want to contribute."…Basically say, this is where we want to go and you relegate all the kind of things—the greenwashing, the "Hey, I have a very funny way of extracting more oil from the most horrible places," where everybody sees this is not the way to go—you relegate it to an obscure, older journal or an older publishing house. I cannot of course speak for your directors. I think it's an elegant way of trying. Of course, the devil is in the details because what's the editorial policy you then pursue—what is acceptable still and what is unacceptable?

Q: Is there anything we can do to help you in your work with the company?

A: At this point, I don't think so. For me what's helpful is to meet a group of people like you. Because one of the big things, I know very well I work with a very big, powerful company here, let's put

it that way. In my experience, companies that are very powerful, it's not always that they're the good ones...You have [an] internal group. Your idea of having like a code of conduct like, "this is something that we absolutely should not endorse publishing." That is not because it's censorship. It's literally going into a direction or supporting moving into a direction that, if you're really serious about climate, that a company like Elsevier shouldn't do. And you can make it clear and have a policy... that makes it very clear what you stand for... You basically have to stand up there... We're quite used to that and I'm pretty sure we can do that in the climate advisory board as well. At the same time, I'm happy to get feedback from you guys if you see something weird happening, that is quite fine. Or if you think "Hey, this is not in line." If Elsevier is really serious about climate, if you see things happening that are really awful, not good, I'm happy to be informed of that. I can bring it up and say "Hey, if your own employees are not happy, you know, consider it."

Q: That aspect of the business [data services, R&D, and tools that help the fossil fuel industry uncover new resources], does the board discuss that activity? What's your perception of that work?

A: No, I think we have 1 hour or so [per meeting], I think we talked 10 or 15 minutes about the Guardian article, that was about it. That is a good point. I can imagine that, let's say that all of a sudden, we have this wonderful new technique and all of a sudden we can drill more oil at the ocean floor, something like that. Where we know we don't need that. That becomes for me a bit fishy, from where I stand personally. In a way, if you know that the proven resources are more than enough to cover the carbon budget that we have...you would need carbon capture and storage to put [carbon] back again.

Q: Right now, the Company seems to be justifying serving certain oil majors whose fossil fuel plans aren't compatible with that warming target by saying that we're helping them "transition." To what extent can new fossil fuel projects be said to be compatible with a transition and how should the company verify that our engagement is actually serving that purpose?

A: That's difficult, that's really difficult... I don't know, I don't have a good answer, basically. You could say we already have all the fossil fuels we need. We know where they are...Shell, or these kind of companies, they can only drill about half of the materials they already own. You could basically say as Elsevier, " I don't do business with you" or "I'm very careful in what kind of business I do with you." And if it goes in the direction of incorporating new oil fields in very weird places or let's say I have new technology for the next level of tiers. Yeah, I don't know—it's an ethical question you almost ask...It's murky—where do you stop?

Q: At an AGM for RELX back in 2015 they told the audience that the Company was already operating according to circular economy principles. What are your thoughts about that self-assessment? Do you find that to be accurate?

A: I think, frankly, no one is circular at the moment, so that's a very tall order to say so...With a lifecycle assessment of the world, Elsevier is a tiny fraction of the whole problem, in terms of their operations. Maybe not in their influence—of course, that's the other part of the discussion.

Q: What are your thoughts on the Company offering financial support to politicians in the US Senate who deny the fact that the planet's climate is changing or that humans don't need to do anything about it?

A: I didn't know that Elsevier is doing that; if they're doing that, I don't feel good...I don't know how big it is and also what's the rational of inviting the sponsorship of bad oil, bad energy companies—how important and how big is that?

Q: What are your current thoughts on these types of voluntary CSR initiatives [UNGC, SDGs]?

A: I have a bit of a hate/love relationship with these kind of things...On the one hand it's very good, because all these companies, they basically say "Ok, I want to be part of the group, the 'I promise to behave group' " They're forced, basically, to conform them to the right goals. But turning it into action...I'm not sure they really manage to overcome the deadlock...and really influence these companies.

Q: To what extent do you think our supply chain complexity and a lack of data kind of compromises the ability to act? Is that an excuse that companies make or is that a real thing preventing fast change?

A: I'd say there is no problem. If you give me your expenditure pattern then we can do a ballpark carbon footprint and we can see...I don't experience at this moment that Elsevier is playing that card, to say that it's too complex...I haven't come across any moment when they said no, we cannot calculate.

Q: The Company at an AGM told investors that they weren't focusing on customer use of products and services because it's hard to measure. In instances, for example, using services to help companies bid on areas of land to develop a coal mine: If that's coal that can't be burned, do you need precise measurements in cases like that?

A: No. This is a very black and white situation.



"Our users really want to get their hands on everything and anything to find that key insight to help them answer the question, 'Where am I going to go to next?'

Elsevier Product Manager, Geofacets

Another external Climate Advisory Board member, recognizing the disastrous impacts of the fossil fuel industry, has called for it to be "shut down as soon as possible."[3] This devastation has been put in a broader context by an external Board member who echoes Elsevier papers on the industry that recognize "colonialist power relations, which facilitated primitive accumulation in the past, continue to persist in the present"[4]:

> **"The type of economic growth we have now is the type where prosperity in one region means doom in another one...We've got a huge number of people who are poor primarily because other regions have set out a certain economic order that goes in their direction... What they do, they come into the countries...select the most powerful part of the community, you buy your support, and you extract the products that you need. You pay very little to the little labor that is around in the villages. And from there the country that is offering these raw materials, you also provide very small amounts in terms of proportion of wealth that you're going to create. And that has been the case since industrialization. You need to address that.**
>
> **Not only that, when you don't get the channel to extract these raw materials, you actually cause conflicts. The question is: why is Libya the way it is? What is happening in the Arab world? What is happening? It's all economic. It's because we need certain raw materials, and we create this destabilization. And there's no way to address climate change when the governments have collapsed...The religious extremists that you see, they are not delinked. They are very linked to this whole development pathway that we follow. And that is why the most wealthy countries have to sit down and say: this pattern of development that we are following, is it really sustainable?"** [5]

In contrast, Elsevier considers the challenge in the oil and gas industry worth addressing to be "new venture projects and how to make them a success." The Company tackles this problem by utilizing Elsevier science content that can "attract and encourage frontier exploration."[6] With the oil and gas industry "more dependent now than it ever has been on high quality scientific information," Elsevier says it's providing "essential" tools for the industry to "unlock science for oil and gas exploration,"[7] such that, the Company boasts, "exploration has never been more seamless."[8]

As one Elsevier Product Manager serving oil and gas has noted, "Our users really want to get their hands on everything and anything to find that key insight to help them answer the question, 'Where am I going to go to next?'... We'll always go back to the customer first. And no matter how our customer needs and desires and pain points evolve, we will always try and develop the feature or the content source to really answer those needs and provide them with the best tool possible."[9] Despite this business activity being deeply misaligned with a healthy future, Elsevier's CEO has said the Company is "deeply committed" and "holding ourselves accountable" to support "the global effort to mitigate climate change," guided by an "independent Climate Advisory Board of leading scientific experts."[10] "

The question," she has observed, "is how do we harvest the anger [on climate inaction] and turn it into hope so we can focus on constructing instead of criticizing?... How do we build on that emotion and build trust?"[11] The answer to this question for large multinationals like RELX is to use the techniques and tools of corporate social responsibility (CSR). The literature indicates that MNE's operating in the extraction industry are engaging in "similar projects to those implemented during the colonial period but have skillfully packaged these as CSR."[12] These businesses, obeying the law only when the costs of crime exceed the profits,[13] have consistently used CSR to block attempts to establish the mandatory international regulation of companies' activities.[14] The changing role of corporations in modern societies (with CSR as its important component, a characteristic of the minimal regulatory regimes of neoliberalism[15]) is a by-product of economic and political forces that have blurred the traditional separation of the public and private spheres.[16]

The "persistent chanting" of the CSR mantra, undertaken with suitable fervor, has tended to fall on believing ears, even of some environmental organizations.[17] But these "green growth" visions tend to presuppose the perpetuation of colonial arrangements.[18] As will be covered in the *Discussion* below, CSR for some scholars is just a euphemism that has recently re-emerged to repackage and "sugar coat" the pillaging of the Third World.[19] Even science is falling under the sway of "another language game, in which the goal is no longer truth, but performativity."[20]

Some of the partners and customers that RELX continues to serve, helping them to thrive and exceed their current production goals:

ANGLO AMERICAN

BHP

BRAVUS MINING & RESOURCES

GLENCORE

Chevron



Discussion

The above DSM strategies are tools of corporate social responsibility (CSR). There's no agreement on the precise meaning of CSR,[1] but it's generally considered the strategies and actions of a firm that benefit society and the environment beyond what is required by the law.[2,3] RELX defines corporate responsibility as "the way we do business, working to increase our positive impact and reduce any negative effects of conducting our operations...it means performing to the highest commercial and ethical standards and channeling our knowledge and strengths, as global leaders in our industries, to make a difference to society."[4] CSR popularly asserts that, if left to their own devices, global corporate citizens can address the greater social and environmental good.[5]

The extraction industry with which RELX is entwined spearheaded the CSR movement to help buffer against criticism,[6] with hearts-and-minds operations to foster sympathy for extractive projects seen as essential for the maintenance and expansion of these legacy businesses; the business-as-usual approach to fossil fuels that RELX favors does not only need to be engineered physically but also requires social engineering to continue the contemporary extractive projects that are severely damaging the planet's capacity to sustain life.[7,8] An extension of PR, CSR entails complex strategies to shift attention away from critical environmental issues by talking about ecological aims without giving up the focus on profit making.[9,10,11] It allows companies, through minimal adjustments to policy and practice, to project an image of reform while changing little, if anything, in terms of actual corporate behavior (e.g. greenwashing).[12] Such greenwashing has emerged as a legitimacy mechanism to maintain access to the exploitation of natural resources[13] and legitimize existing regimes of extraction.[14] By harnessing the power of morally appealing narratives to manage their reputations, CSR rhetoric is aimed at (pre)serving corporate power structures[15] in a ritualistic myth-building exercise[16] that creates a convenient yet dangerous myth.[17] This myth enables the world system of production to pretend to solve the problems that it itself has created by drawing upon ecological narratives to save the Earth while effectively endorsing the continued exploitation of the Third World.[18]

CSR is intended primarily to promote the CSR initiatives of a corporation—not to advance the social good in any meaningful way.[19] This insight is reflected in the SDG Publisher's Compact, to which Elsevier is a founding signatory. Of the 10 non-binding commitments, a majority of them are entirely or partially concerned with promoting the SDGs;[20] none compel signatories to discontinue climate-change inducing practices. In this way CSR initiatives stage an elaborate pantomime to conceal or distract public attention away from the corporate illness,[21] to cover up companies' societal and environmental instances of harm,[22] to compensate for irresponsible behavior,[23] and to mask ultimate motivations of short-term profit making.[24] Studies have exposed the greenwashing inherent in most CSR engagements, with a growing number of large MNEs making performative promises about sustainability, even though their current operations are inherently unsustainable.[25]

RELX's marketing of CSR has created a discourse which legitimizes CSR as inherently good, producing a false consciousness of CSR.[26] In reality, the literature Elsevier publishes indicates that the exaggerated hopes placed in it are not supported by evidence[27] and the assumptions of CSR are neither sufficiently acknowledged nor challenged.[28] Research has found it to be an operationally vague concept characterized by uncertainty and ambiguity,[29] hobbled by problems and variously charged as being chameleon, vacuous, and an utterly meaningless concept.[30] It's broadly marked by widespread noncompliance,[31] deviations,[32] and the limited applications[34] that are documented in the RGRs. MNEs adopt CSR policies mainly to protect their interest and their image in relation to the stakeholders.[34] It's seen as window dressing[35] or a useful 'Band-Aid'[36] used to conceal the threats of stigma, manage legitimacy, repair spoiled identity,[37] and protect reputations and brands.[38] CSR is all about cover up and spin,[39] a kind of misleading corporate PR exercise associated with dubious ethical branding.[40] Ethical considerations ultimately play less of a role than advertised,[41] resulting in commitments that great exceed the empirical reality.[42] Companies partake in this "ethical free riding" without implementing the changes that CSR policies and initiative memberships imply.[43] Resting on a "platform of insincerity,"[44] companies engage in CSR as an attractive device for public relations;[45] to secure a social license to operate;[46] to influence stakeholders; to establish competitive success; to increase the sense of meaningfulness experienced by employees;[47] to gain benefits to reputation; to increase profitability.[48] and to build the trust that Elsevier is seeking.[49]

CSR's appeal for MNEs

Impression management
Symbolic management aims to positively influence stakeholders' perceptions of the firm, engaging in apparent actions that lead stakeholders to believe that the company is committed to societal requirements.[50] Performative policies, events, and reports sooth our conscience[51] and engender a more compliant workforce[52] by portraying the corporation as socially responsible, independent of whether it really is or not—creating an appearance of concern that does not always translate into actual performance.[53] Elsevier's workforce remains largely unaware of its more destructive business activities, enabling the Company to collect donations from employees to plant an "Elsevier forest" while at the same time marketing its products and services to companies that drive deforestation and climate change.

Neutralize criticism
CSR contributes to ensconcing social movements into a corporation-centric, market-driven approach, moving away from the initial ideals of social justice.[54] To find a sort of negotiated truce between corporations and their critics, RELX and other corporations have co-opted the language of activism ("Transformation is required at every level of society...This is a whole systems challenge."[55]) to marginalize actual activists.[56] They've created pseudo-participatory bureaucratic forums that promise reforms and influence in decision-making that never materialize. This is reflected in RELX's pledges to uphold the UNGC and UNGP (UN Guiding Principles on Business and Human Rights), which give the impression that the Company has consulted with public opinion and non-financial stakeholders:[57]

> **Obtain free, prior, and informed consent from potentially impacted people regarding decisions and actions likely to have climate-related human rights impacts; Consider acceptability to the public when deciding what's acceptable risk when there's a reasonable suspicion of environmental harm; Publicly provide information that is sufficient to evaluate the adequacy of response to climate change-related human rights harms.**

Imposing their view of what environmental sustainability consists of,[58] corporations use CSR discourses to neutralize opposition, maintaining legitimacy and colonialism's power relations without achieving any fundamental changes to corporate operations.[59] By offering a pathway to potential reforms, although they never materialize, people can be convinced to hold off on substantive action.[60]

Voluntary/non-enforceable
A central critique to these programs is their voluntary and non-enforceable nature.[61] Corporations like voluntary initiatives because the businesses can wrap themselves in a "cloak of respectability" with no penalties for non-compliance.[62] Voluntary corporate initiatives require minimal internal practice,[63] resulting in only a partial coverage of issues.[64] While CSR initiatives can appear contradictory to the company's existing business model,[65] there's ultimately little incentive for firms to follow through with changing environmentally destructive behaviors if it means reducing their competitiveness with rivals.[66]

> "They just don't even think about the fact that they can be talking about these great things but actually...the profit they receive from these really destructive forces still comes first.
>
> **Jonathan Leggett, Elsevier's 2021 Sustain Festival, referring to MNEs in the extraction industry**

Market driven
Studies indicate CSR is a charming, yet reckless tool, defined by narrow business interests, that only serves to extend the corporate logic of profits:[67,68] the fundamental values of business are unaffected by the vast majority of corporate responsibility initiatives.[69] The achievement of economic goals has endured as a core element in the definitions of CSR over time,[70] tightly coupling it to profit maximization.[71] CSR activities are thus subject to the same limitations of the market[72] and will only continue for as long as it is profitable for firm—even with pressure from stakeholder groups.[73]

Despite some good intentions, corporate rationality limits CSR to perpetuating the interests of economic globalization.[74,75] It's considered a strategic concern[76] and just good business, so ethical appeals to corporate responsibility are irrelevant.[77] Social good is only an incidental by-product of CSR—the central aim is to create positive perceptions by their stakeholders and increase the corporation's bottom line.[78] Social and environmental responsibility is only possible when it does not compromise a corporation's commercial performance[79] and it's folly to think that companies will take seriously the advancement of objectives that conflict with their ability to earn profits.[80]

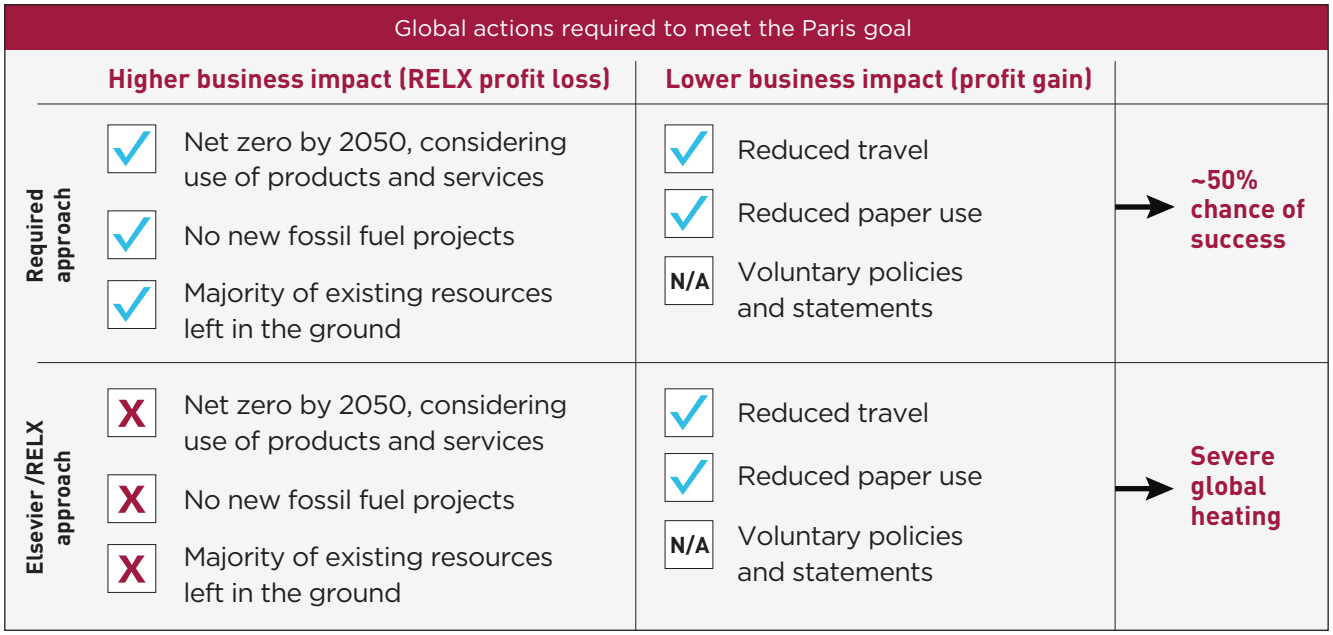


FIGURE 4: Global actions required to meet the Paris goal
The more negatively impactful activity for the climate is also the most positively impactful for Company profits; climate concerns are not prioritized.

Performed: Values-based CSR [81]

> "I don't think [profitability] stops us or absolves us from the responsibility of addressing the longer-term issues that society faces, like on the environment... There isn't one stakeholder that we prioritize over another.
>
> **Márcia Balisciano, Director of Corporate Responsibility, RELX**

Realized: Market-based CSR [82]

> RELX strategic direction [is to deliver]: More predictable revenues; Higher growth profile; Improving returns.
>
> Corporate Responsibility [is] aligned with strategy
>
> **RELX AGM, April 25, 2019**

> The decision to provide offerings to that [fossil fuel] sector is a commercial decision by the businesses.
>
> **Márcia Balisciano, Director of Corporate Responsibility, RELX**

Performed vs. Realized CSR The CSR-marketing claim that no stakeholder is privileged over others is not supported by evidence.

Prevent regulation
Rather than being part of a reformist agenda to reinvent corporations, CSR shows that corporations are inappropriate agents for social change.[83] RELX and the majority of industry are not making the required transformations to truly embed environmental and social sustainability in the way they do business. Sectors such as energy are expected to grow exponentially, so the question is whether this growth can be curbed or more heavily regulated for sustainability. This would entail instituting a regulatory framework within which unsustainable business models cannot function and thrive – i.e., make them economically unsustainable.[84]

The lobbying and legitimizing powers of the corporation are aimed at civil society and the state to ensure that any tendencies to rein in or hold corporations to account is, at best, muted.[85] MNEs have opted to self-regulate in response to social activism to avoid and reduce the threat of regulation,[86,87] and—as is the case with RELX's allies in the fossil fuel industry and the U.S. government—block attempts to establish the mandatory international restraint on companies' activities.[89] MNEs have been instrumental in developing global CSR standards because it creates new institutional arrangements that better fit their corporate context, taking over some of the traditional state functions.[90,91,92] Thwarting any attempts by civil society to redefine corporate power, CSR is an elaborate enterprise to maintain and reify the hegemonic authority of large corporations.[93,94] It represents the re-drawing of the boundaries between corporate- and state-centred regulation[95] and the usurping of the role of the state without accountability to citizens.[96] Business's default position remains opposition to regulation,[97] so without some countervailing power, self-regulation that effectively addresses the climate crisis is unlikely and the fact that business support for regulation is needed does not mean that it will be forthcoming.

The most problematic business models and practices are based on the use of fossil fuels and non-renewable resources; businesses operating in exploration, extraction, refining, and processing of fossil fuels must be considered fundamentally unsustainable.[98] Corporations involved in work that is inherently damaging to the environment have little incentive to change their behaviors voluntarily—leaving firms with little reason to ensure ethical communication strategies.[99] The right communications can often satisfy stakeholders in the absence of tangible action, so leaders are inclined to display word-deed misalignment by giving "the rhetoric to one side and the decision to the other."[100] Business is thus constructing the dominant discourse around sustainability but in a way which – at best – ignores discourse in both the development literature and the development community as well as the growing body of scientific consensus.[101]

RELX/Elsevier's use of CSR defensive stigma management techniques has helped it to ward off criticism and remain engaged in developing strategies to attain significant production gains for the fossil fuel industry[102] that are intended to stimulate global oil production for decades to come.[103] While making use of incomplete reports and promoting environmental statements and policies that mandate no compliance or restrictions on ecologically disastrous activities, the Company continues to help uncover new exploration opportunities,[104] accelerate exploration efforts[105] in "riskier, more remote areas,"[106] and "maximize total recoverable volumes of oil and gas resources."[107]

Despite its claims, CSR hasn't been found to have a significant influence on environmental management.[108] Because of its nature and legal-economic structure, the corporation cannot achieve what it promises to do according to the CSR gospel, which can instead be used to extend colonial modes of governance.[109] There therefore exists an argumentative burden to those at RELX who would advocate for CSR—simply having standards and codes is not enough to ensure that corporate responsibility is applied:[110] CSR-marketing rhetoric that insists the core mission of Elsevier is to improve health outcomes for the benefit of society is not sufficient to prevent the Company from accelerating activity that's fueling irreversible global heating, the largest health threat of the 21st century.[111] There is little reason for confidence that RELX or any of today's leading corporations are operating in a way that will help humanity forestall the looming environmental crisis.[112] As currently articulated and practiced, CSR is insufficient and may actually constitute a move in the very opposite direction of environmental stewardship and social justice.[113]

> "RELX is one of the most sustainable businesses in the world.
>
> **Chairman and Director of Corporate Affairs , Elsevier** [114]



Conclusion

The life support systems of the planet are failing. Emissions continue to increase globally, and no country is on track to achieve the SDGs by the 2030 deadline.[1] Yet companies are increasingly perceiving the climate crisis as a business opportunity rather than a threat[2] and, despite the increased sustainability talk, a significant gap persists between corporate sustainability discourse and its practice. Large firms such as RELX tend to participate in symbolic CSR activities and do not 'walk the talk,'[3] using CSR tactics as central defensive mechanisms for managing the effect of organizational stigma and refocusing attention.[4] This is referred to as the "large firm implementation gap," where large firms do less to implement CSR into their core structures and procedures.[5] Such firms conform closely to environmental discourses, but do not attempt to implement those at the operational level. This is how RELX is able to avoid the scrutiny of internal and external referents, who are not aware of the misalignment between organizational policies and practices. Corporate hypocrisy is used to legitimize the practices of such organizations until stakeholders become aware of and refuse to tolerate the blandishments of espoused stakeholder engagement practices versus enacted business operations.[6]

As the physical realities of a world unravelling under climate disruption become more obvious, the extraction industry will need to develop new public relations discourses if it is to continue delaying the dramatic decarbonization needed to avoid a catastrophic climate future.[7] Serving the current aims of that industry inhibits RELX's ability to sound the alarm about what these companies are doing, and how RELX's business with them will have increasingly severe ramifications for the health of society and the planet. Despite the Company's commitment to achieving business goals "in an open, honest, ethical, and principled way,"[8] leadership has been unwilling to openly confront the reality that the fossil fuel activity RELX is engaged in cannot realistically be a part of a world that stays below 1.5°C warming or acknowledge that environmental policies that permit the Company to participate in ecocide are fundamentally misleading. The inability of CEOs and other leaders across RELX to comply with both environmental policies and ethics guidelines underscores observations in the literature regarding the misleading nature of symbolic CSR tools and their ineffectiveness in bringing about the transformational changes that such MNEs claim to be striving for, but that commercial considerations compel them to resist.

Significant changes in the way businesses think and function are required to meet sustainability challenges. The dominant business model, which is focused on short-term economic value, has to be reconsidered,[9] while corporate social performance can only be expected to grow if it's recognized that it includes two distinct activities: (1) firms must impart some benefit on society; and (2) firms must also avoid, prevent, reduce or mitigate any number of socially deviant behaviors—known as corporate social irresponsibility. The major source of irresponsible behavior in firms is a result of people merely following the dictates of their roles. Owners and managers haven't been provided with incentives to make socially responsible decisions[10] and practitioners of impression management remain orphaned of knowledge and practical guidance on how to account effectively for negative corporate impacts.[11]

Employees at RELX have been told they "own" corporate responsibility, but it's unlikely they can effectively do so while being subjected to impression management practices that are consistent with what the literature defines as greenwashing. If accountability is to be achieved, stakeholders will need to be informed and empowered such that they can "hold the accountors to account,"[12] while leadership has to be willing to critically question their assumptions and give up their dominant influence on the current discourse. With policies and codes that are neither clear nor operational,[13] there's a need to go beyond the carefully cultivated corporate image and engage with actual corporate practices, considering their impacts on the lives of people.[14] In the absence of any systematic scrutiny and pressures that would highlight corporate hypocrisies and hold them to account, there is unlikely to be any changes in corporate behaviors, to their organizational culture, and in their role in the climate crisis.[15]

> "Some government and business leaders are saying one thing and doing another. Simply put, they are lying. And the results will be catastrophic…Governments and corporations are not just turning a blind eye. They are adding fuel to the flames. They are choking the planet based on their vested interests and historic investments in fossil fuels…The truly dangerous radicals are [those] increasing the production of fossil fuels.
>
> **Secretary-General Antonio Guterres,**
> *Upon the release of the latest IPCC report, April 4, 2022*

> "We can only create a culture of integrity and compliance if everyone plays a role and is prepared to stand up for what's right and to do the right thing, as we set the standards we choose to work and live by.
>
> **Simon Helliwell, RELX EVP, Human Resources**
> *"Video about compliance: Our culture of integrity is everyone's duty", November 10, 2021*

Appendix A: Policies

From the Fall 2021 RGR; for additonal policy information see the Spring 2021 RGR.

GENERAL
Support the rapid reduction of greenhouse gas emissions and minimize contributions to climate change across the business at the scale deemed necessary by science, recognizing the impact of consumer use of our products and services, to meet the targets of the Paris Agreement.

Ensure that no part of the company is conflicting with company sustainability commitments and objectives.

Prevent "any contradiction between [our activities] and sustainable development."

Identify risks of contributing to adverse impacts and "take the necessary steps to cease or prevent [our] contribution."

Work with partners who demonstrate a responsible approach to managing environmental impact.

INTERPRETATION
Interpret "sound environmental management" in its broadest sense, "embodying activities aimed at controlling both direct and indirect environmental impacts of enterprise activities over the long-term."

Support a precautionary approach to environmental challenges, emphasizing prevention of harm.

Determine "the appropriate response to the identified risks" based on "the severity and probability of adverse impacts."

Prioritize actions in a way that "begin[s] with those human rights impacts that would be most severe," with immediate action required "where there are threats of serious or irreversible damage" in which "a delayed response may make the impact irremediable."

PRODUCTS and SERVICES
Refrain from providing goods or services that we know will cause harm, and to not be silent or inactive in the face of harm being done.

Discontinue "activities with potentially adverse climate change-related human rights impacts."

Seek to prevent or mitigate "an adverse impact where [we] have not contributed to that impact, when the impact is nevertheless directly linked to [our] operations, products or services."

LOBBYING
Strive for coherence between responsibility to respect human rights, including as they relate to climate change, and policies that govern wider business activities, including lobbying activity.

Ensure lobbying activities don't elevate inaccurate, misleading, and unfounded assertions which harm the ability of States and the public to make informed decisions regarding climate change.

HUMAN RIGHTS
Uphold the Universal Declaration of Human Rights, including the right to a standard of living adequate for proper health and well-being—maintaining that no group should engage in any activity that denies those rights.

"Integrate climate change considerations into [our] human rights due diligence processes."

Address any negative human rights impacts with which we may be involved either through our own activities or as a result of our business relationships—this applies to impacts from climate change and in the absence of government regulations.

Respect human rights as "a global standard of expected conduct that applies even in the absence of clear domestic climate obligations."

Recognize that "in no case may a people be deprived of its own means of subsistence."

Take "active consideration of how to minimize misuse of data and negative impact on people", putting "people at the center while guarding against potential harms."

CONSENT
Obtain free, prior, and informed consent from potentially impacted people regarding decisions and actions likely to have climate-related human rights impacts.

Consider acceptability to the public when deciding what's acceptable risk when there's a reasonable suspicion of environmental harm.

"Publicly provide information that is suffcient to evaluate the adequacy of [our] response to climate change-related human rights harms."

ETHICS
The RELX Code of Ethics requires employees to act in conformity with these policies. It also prohibits employees from making false or misleading oral or written statementsor omissions about our policies, products, and services. Additionally, it stipulates that if any conduct could be considered to hurt the ethical reputation of the company, may feel or give the appearance of being ethically improper, or would appear unfavorable if seen on the evening news or social media, then we must reconsider our approach.

RELX Operating Principles also require employees act in conformity with Company policies, and instructs employees to incorporate ethics into all actions, grow the business with integrity, speak out for what is right, hold each other accountable, and swiftly pivot when shown to be wrong—in this case by the health and scientific communities that the Company serves.

Appendix B:
Reporting and internal stakeholder dialogue—case study

Reporting: RGR Spring 2021

April 2021: RGR Spring 2021 ("the Report") was submitted to Human Resources (HR) as part of an ethics complaint in April 2021, the concerns being the misalignment between policies and business activity. This was reinforced in a call in mid-May with Elsevier's Managing Director of Premium Brands (MD), in which it was suggested that "if the Company isn't going to do the things it says it's doing, then it shouldn't be saying it's doing those things." The Report was also submitted to the RELX CEO, who is responsible to the Board for environmental performance. It was also sent to the CFO, who is "our most senior environmental advocate," while "the CEOs of our businesses are responsible for complying with environmental policy, legislation and regulations." I was informed by the MD that the issues would be investigated, but in the meantime, I was invited to speak with the Director of Corporate Responsibility (DCR), a member of the Internal Climate Board (ICB).

July 2021—CR call #1: Based on the discussion, I later reported to my Manager that the conversation produced the impression that the DCR hadn't fully read the Report, as they seemed to be unaware of aspects of the business and the climate science that were covered within the Report—which made it difficult to have a productive conversation. The DCR spoke extensively on UN Sustainable Development Goal (SDG) aligned activities and other sustainability-oriented projects. In briefly addressing the Report, the DCR indicated that it refers to minor aspects of the business, that RELX wants to be in fossil fuels to help the industry in its transition, and that oil majors can be trusted to transition ("These companies aren't stupid," referring to their desire to have a functioning planetary system in which they can operate; in a follow up email, the DCR clarified that she didn't say the oil and gas industry is doing right by the climate). I provided evidence that this belief that the Oil Majors aren't stupid is misguided by speaking to the industry's history and their current development plans, some of which had already been highlighted in the Report. I also questioned the DCR's claim that RELX isn't really an oil and gas company by referring to a recent company webinar that declares finding new fossil fuels is what Elsevier and Geofacets are "good at."

The DCR did not address any specific issues in the Report, did not point to any inaccuracies, and indicated a lack of familiarity with the climate data to verify if the company is actually Paris-aligned—but that others in management are informed on such things. The suggestion that the Company could refrain from claiming it's fully aligned with the Paris Agreement until it could verify that claim was not embraced, nor was the idea of altering the wording of our policies in order to more accurately reflect the business. I also brought up the misleading nature of inviting external speakers to RELX events such Muhammed Yunus, who is on record—along with many other Nobel laureates and scientists—in being vehemently opposed to some of our business activity. Another such example given was the giving of a Customer Award to Sam Zarifi (of the International Commission of Jurists) for his work in defending citizens of Myanmar from the military dictatorship, while the same time our Company works with and promotes a company (Adani/Bravus) that has financial ties to that same military dictatorship that's committing genocide. I asked if our policies might compel us to not work with this specific company; the DCR was non-committal, and 8 months later there has been no known change to that business relationship. The primary concern expressed by the DCR centered on use of information from Elsevier research papers, as well as other company IP, in that internal report.

After the call, the MD sent an email framing the Report as representing the perspective "that we should make stronger measures, more quickly." I replied to correct this and restate the observation, as I had in our call in May, that "if our intent is to continue to engage in this type of [fossil fuel development] activity—which the company has every right to do—then the messaging and policies should accurately reflect that."

The only result of this initial dialogue was that a new policy was created: *"Refrain from using, reproducing or sharing any Elsevier/RELX owned (copyrighted) content, except gold open access (which is publicly available); data and any other Elsevier/RELX IP without requesting prior permission from us [the 2 ICB members] and in any format." (See: Figure 5 below)*

August 2021: I emailed the DCR, asking to discuss these issues with those in charge of ensuring company compliance with the RELX Global Environment Policy, which encompasses all other company environmental policies. While I indicated the policy stipulates the CEOs of each business unit are accountable for ensuring compliance with the policy, the DCR opted to set up a call with her direct report, the Global Environment Manager (GEM) who was also on the Elsevier internal climate board.

September 2021—CR call #2: I and roughly a dozen others participated in a call with the DCR and the GEM. The DCR spent much of the time again emphasizing policy-compliant company activities and again said the report concerns only small aspects of our business. The DCR expressed a belief that the Company doesn't have a policy that says we're to refrain from providing goods or services that we know will cause harm; it was pointed out this is in fact an aspect of one of our policies. One attendee expressed disappointment that the DCR was steering the discussion away from environmental policy compliance, such as by focusing on the impacts of the carbon footprints of individuals and the need for mining to obtain materials for our laptops. Another participant expressed their wish to see company policies and statements accurately reflect the full extent of the company's business activity.

When asked, the GEM said the company is in full compliance with Company environmental policies but offered no evidence. 2 follow-up emails sent to the GEM, spaced 2 weeks apart, posed clarifying questions. These included asking where RELX's threshold of 'where the line is' regarding allowable negative environmental impacts and inquiring as to what it is that our environmental policies actually prohibit. Email (excerpt): *"Regarding where your bar is for our policies, to give an example: we have a custom product for a company [BHP] that holds memberships in anti-climate trade organizations, has directly lobbied to increase its emissions, is resisting investor pressure to change, has deceptive carbon reporting practices, and is being investigated and sued in at least 3 countries for different environmental and human rights crimes. In your judgement, what would that company need to do to cross our threshold of not doing enough to demonstrate a responsible approach to managing environmental impact? What is it our policies prohibit? Thanks again for your time."*

The GEM was unwilling to respond to these questions. In emailing the DCR follow up questions concerning their belief that the fossil fuel industry will transform and the offsetting of our negative impacts, dialogue was discontinued by CR without having provided any evidence to refute the findings in the Report.

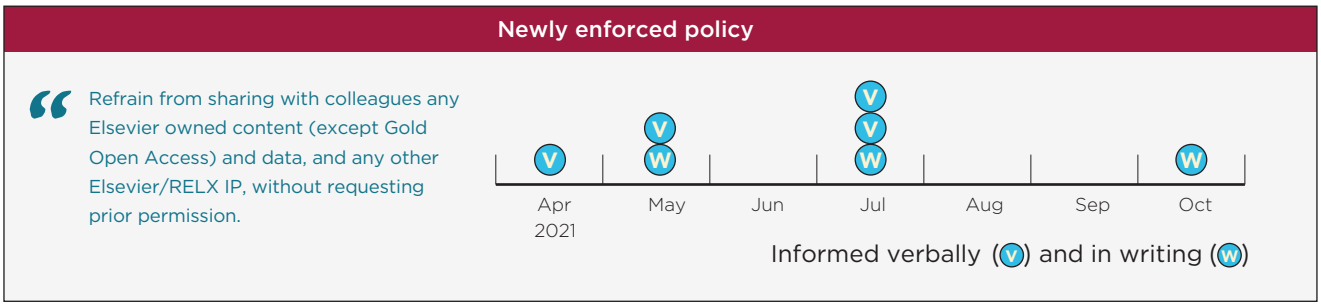


FIGURE 5: Newly enforced policy There was a heavy emphasis on preventing the internal distribution of paywalled climate research or use of any Company IP without authorization, a response to greenwashing concerns that an editor-in-chief at an Elsevier jounral described as "intimidation."

Reporting: RGR Fall 2021

September 2021: In collaboration with a 50+ person advisory group, another RGR was drafted. As with the previous one, it analyzes Company policies and business activities in the light of the current climate science. It contains 1 ask for RELX leadership and 10 questions for the Cell Press Senior Management Team (SMT) that the group requested written answers prior to having the answers discussed at the next Cell Press Town Hall. The next Town Hall was cancelled and the following two occurred without any reference to the Report or the questions from the group. There has been no communication from SMT to the group regarding the 10 questions in our Report (as of April 2022).

October/November 2021: 6 months after receiving the first report, HR was contacted to inquire about the status of the company investigation. The HR rep who fielded the initial ethics complaint said they were unaware if the company had in fact undertaken an investigation. I then reached out to the Chief Ethics Officer at RELX to inquire. I was informed there had been an internal review of the Report that concluded the company has not made any false or misleading statements. The Chief Ethics Officer and RELX Chief Compliance Officer, who are the interpreters of the Ethics Code, would not reveal why or how their conclusions were reached or if any of the information in the reports was considered inaccurate. They refered me to something called the "Climate Action Committee" as the proper forum for these issues. I informed them that to date we've yet to have meetings that addressed the substance of the reports with those who are tasked with ensuring policy compliance (CEOs) and asked Compliance who is in the "Climate Action Committee." I have not heard back from them regarding those points.

Reporting: Additional observations

As part of the reporting process, these reporting procedures were not observed:

- *Advise the Reporter that the Company has procedures in place to assign responsibility for investigating potential misconduct.*
- *Let the Reporter know that we follow the Code and local law as it relates to confidentiality or anonymity of Reporters and witnesses.*
- *Assure the Reporter that we prohibit retaliation and they will not be retaliated against or victimised because they reported a genuine concern to the Company.*
- *The individual assigned to investigate should provide the Reporter with an estimated timeframe to complete the investigation and advise the Reporter if circumstances will prolong the investigation.*
- *At the conclusion of an investigation, when possible, the Reporter should be notified the investigation is complete. The amount of information shared with the Reporter about the results of the investigation will depend upon whether the concerns directly relate to the Reporter's employment and/or are otherwise subject to other confidentiality obligations.*

Stakeholder engagement: REPAC

This same style of stakeholder engagement was observed when employees engaged with the RELX Political Action Committee (REPAC) regarding concerns raised by Cell Press employees that touched on Company values and policy compliance—some of it relating to the PAC elevating the voices and actions of climate change deniers. A PDF that addressed company policies and values containing 4 questions pertaining to the PAC was distributed by the Managing Director to everyone at Cell Press.

July 2020: After sending the PDF to the DCR, she twice declined to answer any questions within (Q1 in *Figure 6*), deferring to PAC board members. In 2 conversations, the PAC representatives declined to speak to questions of company policy compliance, instead focusing on positive aspects of the company, such as a matching donation program and allowing employees to use 2 paid days per year to volunteer. Contradicting the DCR's assertion that "there isn't one stakeholder that we prioritize over another," one REPAC board member acknowledged the privileging of financial stakeholders: "[REPAC is] looking for things that are important for our paychecks... [a] frontline watching for things that will tank our stock value."

After the 2nd call, 9 additional questions (Q2) from a half dozen Cell Press colleagues were sent to them; they were acknowledged, but answers were never provided.

February 2021: Those questions were re-sent, along with 8 new ones (Q3) from Cell Press employees, to HR, which shared them with REPAC in advance of another meeting with employees. The PAC board members declined to answer any of those questions and instead focused solely on recruiting new PAC members and donations from those who were in attendance.

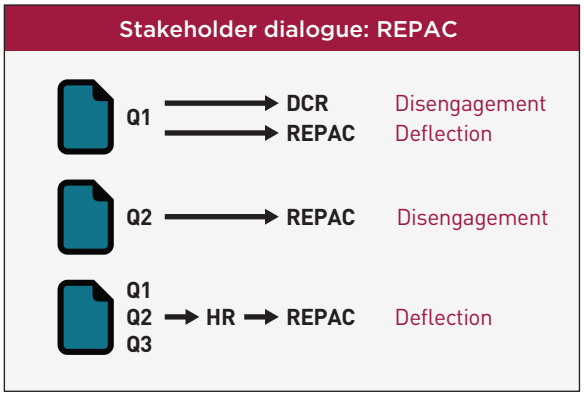
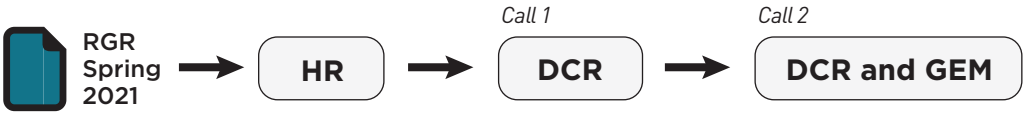


FIGURE 6: Stakehlder dialogue: REPAC
The only insight offered regarding the questions presented to the PAC was that the PAC privileges financial stakeholders, contradicting CSR-marketing claims to the contrary. Another CSR-marketing claim, that ignoring employee concerns is a prohibited form of retaliation (RELX Code of Ethics) also appears to lack enforcement.

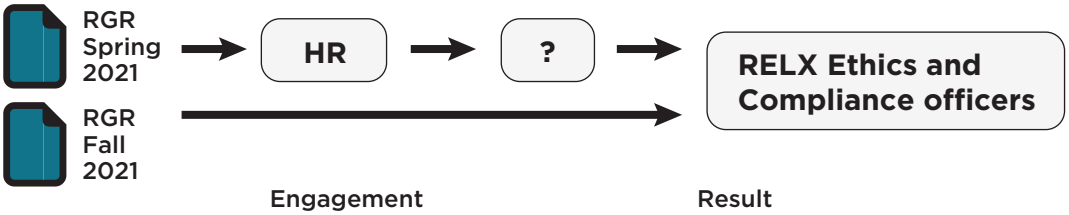
FIGURES 7-11

Stakeholder engagement

Thanks to everyone at the Company involved in these dialogues and communications



	Engagement	Result
DCR	Focused on activities not in the reports. Couldn't say if the company is Paris-aligned. Appeared unaware of issues addressed in the report (coal exhibitions) and that we have a policy that prohibits selling goods and services that we know will cause harm. Twice emphasized the reports address minor aspects of the business. The decision to provide offerings to that sector is a commercial decision by the business. We are compliant with our policies.	In emailing follow up questions concerning their belief that the fossil fuel industry will transform and the offsetting of our negative impacts, dialogue was discontinued. Referred to the "Climate Action Committee" as a forum to address these issues.
GEM	We are compliant with our policies.	No replies to 2 emails with follow up questions: • *Do you find any policies misleading?* • *What would [a business partner with various environmental and human rights violations] need to do for our company to discontinue the partnership?* • *What is it our policies prohibit?*



	Engagement	Result
Ethics and Compliance	The Company's business activities related to the fossil fuel industry do not render any Company statements false or misleading.	Never consulted with the Reporter; unwilling to share information used to reach their conclusions or if they found any of the information in the reports to be inaccurate. Referred to the "Climate Action Committee" as a forum to address these issues; Compliance has not responded to a request asking who is in the "Climate Action Committee."



	Engagement	Result
Cell Press SMT	None.	Cell Press' Senior Management Team (SMT) has not responded to the 10 questions posed to them in September in the Fall 2021 report.

Stakeholder engagement (continued)

RGR Fall 2021 → **Global Director of Sustainability, Elsevier**

	Engagement	Result
GDS	Acknowledged areas of concern but expressed disappointment the report didn't focus on positive impacts of the Company.	No answer to this question, or follow-up question: • *Do you think the company is fully adhering to our environmental policies?* • *Do you think those at the RELX level are misinterpreting the science or our policies?*

Endorsements

RGR Spring 2021 → **VP Internal Climate Sustainability Program and ICB member, Elsevier** — *"You have assessed many RELX business activities that work against our climate pledge."*

RGR Spring 2021 → **Internal Climate Board (ICB) member** — Climate science expert

RGR Fall 2021 → **RGR Committee** — Experts publishing the latest research; other concerned employees at Cell Press, The Lancet, and Elsevier (50+)

Appendix C: DSM-style communications

Deflection

Elsevier Town Hall question:
Elsevier has books, journals, R&D, and data services that are directly striving to boost the production goals of the fossil fuel industry, an industry whose existing production goals guarantee we'll fail to meet the Paris target and lead to catastrophic global heating. 1) Why are we doing this? 2) Why does messaging to employees, investors, customers, and other stakeholders fail to reflect that the company considers this to be environmentally acceptable activity? Thank you.

Written reply from Internal Climate Board (ICB) member:
Great question. If I can unpack the question a little my assumption is that the question is shorthand for 'If we are committed to reducing our carbon emissions to net zero does supplying Oil & Gas companies run counter to this commitment.' One of the key things which will speed the transition is scientific progress, research and development of clean energy solutions. Our job as a global information and analytical insights provider is an exciting one. It is to support that science and supporting our customers to drive progress by providing them with research which will help them in their transition. The energy industry is already heavily motivated to make the transition by combinations of shareholder and government actions. We have been working with the Energy industry to provide them tools for this transition. For example in our Engineering business we now supply them with content on carbon capture and wind energy. In STMJ we have launched journals specifically in clean energies.

Follow up email:
I appreciate you sharing aspects of the company that can be mapped onto SDGs, but I'm wondering if you could still please answer these questions and share with me the evidence that indicates this transition you refer to is being undertaken by an industry motivated to be aligned with the 1.5C goal. Thanks

ICB member reply:
Thanks for reaching out again with your questions from the town hall. I certainly sense you are frustrated with the pace of the oil and gas companies to transition to clean energy and as a fellow advocate I can certainly empathize with this thought.
To further elaborate on your question, I think we need to break this down in some parts. Firstly, I think you are asking about our product strategy with the insulation that our strategy explicitly aims to drive fossil fuel production. I am cc'ing in Stuart who is the expert here to help explain further and I am sure can share the drivers of change in this space.*
On my side, I would like to highlight that actually I see our product activities driving more sustainable insights every day, and that we have accelerated our actions in this space. I was so impressed to see the Energy Books team implement a new acquisition strategy to only accept content that is positively contributing to the energy transition – a first for our industry. I am also super excited to see Geofacets helping customers understand the energy transition with the very cool Geofacets Day being held this Thursday. During Cop 26 we also produced the net zero report on clean energy research which has really driven some great high level conversations with funders as they too transition towards the demand for clean energy research . Of course these are just a few examples, there are many more that demonstrate how we are driving change in this area as we have so many passionate and inspired collegues taking action.
The second part to your question implies that we view fossil fuel production and its contribution towards climate change as acceptable. I think Kumsal has been very clear during the town hall, that we take climate seriously. At an Elsevier level, and as a member of SUSTAIN, you saw that we have a very clear climate emergency statement on els.com that outlines our position. This is reinforced at RELX and on the RELX website. Kumsal has also outlined the steps we are taking to address our own impact and to help our customers as well. Another example is the new climate board, similar to our I&D board, to again accelerate our contributions towards a net zero future.
Although your question focused on fossil fuels, there are many other drivers that are required to change in order to achive the Paris Agreement – food systems, consumption, transport, infrastructure etc. In my experience our leadership team, product managers and our lovely fellow SUSTAIN members are all committed to trying to drive progress in sustainability. There are some exciting times ahead with lots of ideas in development.

Outside the context of corporate DSM rhetoric, the answers to these 2 questions could straightforwardly be stated as 1) Commercial considerations; and 2) Stakeholder impression management. But merely acknowledging the priorities of profit and managing company image are forbidden, rendering an honest and open dialogue around these issues unlikely; doing so would undermine the effectiveness of symbolic messaging.

Compliance question:
Comments section below a RELX video about compliance:
"It's hard to understand how the Ethics Code and Doing the R.I.G.H.T. Thing allow for the company to align its business objectives with those of the fossil fuel industry, whose plans for this decade will make the Paris goals and SDGs unattainable. Our business activity in R&D, publishing, exhibitions etc. that aims to have that industry exceed its current production goals is clearly at odds with our public statements about aligning with the Paris Agreement. If this activity contrasted with our statements doesn't violate the Ethics Code, as the company claims, then what does?"

Reply from Compliance Senior Legal Counsel:
*Thanks for your comments. I am posting this response on behalf of Rachel Martin who is the expert in this area.***
• Our operating principles clearly state that we want everyone to be empowered to make the right decisions and we are pleased that you have voiced your concerns. These have been noted and we are happy to say these are part of our actions that make up our Climate Action program and Sustain employee network group. We have already started to transparently communicate these activities as part of all employee webinars and we are looking forward to doing more of these updates on progress throughout 2022 as we put climate high on our agenda.
• Our mission as a company is to help researchers and healthcare professionals advance science and improve health outcomes for the benefit of society. We recognized that climate change is a major issue and having established our climate action program little over a year ago have made significant strides to becoming part of the solution. In terms of our own carbon footprint, following on from RELX's excellent lead we have reduced our emissions by 53% since 2010 and are in the process of setting Elsevier targets to hold us accountable to becoming net zero for all emissions by 2040, a decade ahead of Paris. On our content and product portfolios and in the cases where our customers may indeed be part of the oil and gas industries we have also taken action. Our books team have now implemented a "publishing for a purpose" mission to only publish research that positively contributes to the energy transition and we recently published a free report on Clean Energy to give deep insights into how the research landscape is evolving in this important area. There are many more initiatives and projects that are in development and we look forward to sharing these with everyone in the new year.

*Stuart opted not to explain further; **Elsevier's Global Director of Sustainability does not have an environmental science background.

Conflicting goals
At the Elsevier STMJ (journals) Get Together on March 1, 2022, this question was submitted into the Zoom chat: *"One of Elsevier's top priorities in 2022 is to build trust by partnering with the communities we serve to help them meet their long-term objectives. The Company is currently partnering with communities that are working to solve the climate crisis; we are also helping a fossil fuel industry that is preventing an energy transition as we try to increase their production goals—activity that renders some of our environmental statements false. Given this, how can the Company expect to generate trust?"*

The meeting host, the Managing Director of STMJ, replied: "We are following up on this because there are a lot of things. This is a really nuanced topic," and said it would be addressed at the next Get Together meeting. At the next meeting on March 28, the question and the topic were never addressed. The goal to build trust was diminished in favor of the goal to generate more content: "We measure success by...the size and the quality of the knowledge base we publish. So, if you think about goals and outcomes—measurable goals—those are the targets and the goals we talk about."

Dissociation

Negative impacts
At the 2017 AGM, the Company indicated that it is not considering the negative impacts of the use of products and services as part of the Company's impact because it's difficult to obtain precise measurements regarding those impacts:

"...question on the impact of the RELX products used by customers. He explained that the business of RELX was all about helping its customers to be more efficient so that they could reduce the resources they needed, both in terms of cost and in environmental impact. It was quite difficult to measure how the customers behaved, how they used things and what they did, which is why RELX was a little reluctant to start trying and collect or publish data on that."

Net zero scope
Showcasing the folly of associating net zero commitments with effective action and environmentally responsible business practices, the Company has indicted its net zero commitment won't consider use of its products and services—something it's supposed to already be doing as indicated in the RELX Global Environmental Policy. These are questions from two employees at a November 2021 presentation on the company's net zero pledge:

Question:
"Elsevier's business (Geofacets, for example) works to expand new fossil fuel exploration and production projects that can last many decades, meaning to be net zero in 2040 the company is already committing to procuring a massive amount of offsets. As such, does this new policy need to be approved by shareholders?"

Answer (excerpt):
"That [Geofacets] wouldn't be considered part of our footprint. Our footprint is essentially everything we create ourselves and our suppliers also create for us, but doesn't include the things our customers do with what we create."

Question:
"Even if Elsevier succeeded in zeroing our own carbon footprint, as long as we (and/or larger RELX) continue providing information and services to the fossil fuel industry, we will be aggravating the problem that our own behavioral changes are aimed at solving. Are there any plans to wind down our product lines that serve the fossil fuel industry?"

Answer:
"This is the same question as before. That's about product lines, I think I've answered that."

Deception/non-disclosure

Prospective employees
When actions are insufficient to meet or contrary to the expectations of stakeholders, managers simply choose not to disclose them.[1] One example at RELX was the attempt to include in an internship job post an indication that the intern wouldn't be working on any materials associated with the company's fossil fuel work. In rejecting this proposal, 2 members of Cell Press' Senior Management Team (SMT) stated their reasoning was that it would be inappropriate to suggest that an aspect of the company is objectionable, that such a statement wouldn't be relevant to a broad enough audience, and that there isn't scientific consensus that new fossil fuel exploration and development projects are objectionable. This not only contrasts with polls[2] and the climate reality, but also marketing claims by the DCR that the Company is being honest with applicants and is responsive to their concerns: "My colleagues involved in recruitment tell me this is a common topic of conversation... [applicants] want to know that they're joining a Company where they have the chance to make a positive impact on society."[3]

Forum-dependent messaging
Deception is utilized in the context of changing the messaging when the audience changes. In a February 8, 2022 interview on *Sustainability* magazine's website (*Elsevier on the obstacles to a successful energy transition*),[4] Elsevier's Senior Product Manager Sandra Merten proclaims that "reducing overall carbon output [is] essential to meeting international goals, like those set out in the Paris Climate Agreement...it is critical that the [fossil fuel] industry does what it can to attract these new recruits and prove it is serious about meeting these targets." Yet in a September 2021 Elsevier webinar (*Energy Transition*, "A discussion on how and why Oil and Gas companies are becoming Energy companies and its many implications."[5]) Ms. Merton encouraged engineering students to go into oil and gas for "adventure exploration...-looking into totally new areas"—something that cannot happen if climate targets are to be met. *Sustainability* magazine, it should be noted, is owned by BizClik media group which describes itself as "the corporate storyteller for the world's largest companies" that "allows clients to showcase their corporate vision."[6] For her article, Merten is promoting data services for oil and gas, an industry which she neglects to note is inhibiting an energy transition. Sustainability magazine's events include "Mines and Money," which brings together miners, investors and financiers, and World Energy Leaders Virtual Summit, sponsored by some of the world's largest oil companies.

Awards
A March 2022 "Elsevier Sustainability" newsletter promoted the recognition of the Company (RX and Elsevier) for climate action by the website Comparably. What this didn't mention is that Comparably is "a platform that gives a bit more control back to employers" that works "with HR, chief marketing officers, and folks in the employer branding space and give them a platform." As their CEO put it, Comparably gives employers "the ability to put their best foot forward and showcase to the world...Then they can use that on their job postings or the recruitment marketing efforts." Based on company size, Comparably pricing ranges between $15,000 and $50,000 a year; it's unknown at which price level RELX has been placed.[7]

Investors
Leadership uses their platform to mislead investors. At the 2015 AGM, they made the inaccurate claim that "Reed Elsevier already operated according to circular economy principles."[8] This is simply not true: broad use of fossil fuels, and certainly the mission to uncover new resources to burn, is incompatible with a circular economy.

Denial

Largest impacts
Rather than focusing on revenue generating products and services that are driving climate change, a recurring theme is the company's emphasis on air travel as one of its greatest impact areas. While global use of air travel must be drastically reduced, expanding the availability of cheap fossil fuels has an astronomically greater impact on the chances of seeing the world achieve the Paris targets.

• **Senior Leadership** (2017 AGM minutes[9]): *"VBDO noted various policies on environmental impact trough operations and the supply chain but had not found any evidence of RELX taking actions or having targets in the area where RELX could have had a potentially negative impact on costumer use of its products and services. She wanted to know if RELX had such targets and if RELX intended to define such targets."*

"The Company had tried to do a life study of a journal to see where it has an environmental impact. It was actually mostly RELX's own activities which needed to be focused on, including for example the travel of RELX people getting to work. The realisation from that study was that it was important to focus on things where RELX could actually make a significant difference. Mr Nick Luff explained that that was why RELX focused its efforts there rather than trying to measure what exactly the customers did with the products, which was quite difficult."

• **Managing Director STMJ, Elsevier** (Email to STMJ group): "To comply with the Paris Agreement, Elsevier is committed to reduce air travel by 50% starting next year."

• **Managing Director STMJ, Elsevier** (Email, replying to greenwashing concerns): "With our Elsevier program management around Climate we hope to exceed the Paris Agreement goals – including our tier 3 emissions. Think of major contributing factors such as paper and travel – if the rest of the world does that too, we make a real impact."

• **Premium Brands Managing Director** (Email, replying to greenwashing concerns):"We did in fact discuss climate actions and cutting our emissions on travel by 50% at the last PBG meeting."

• **Global Director of Sustainability, Elsevier** (Email, replying to greenwashing concerns): "I am disappointed to see this report didn't accurately reflect the progress and steps undertaken at an Elsevier level over the past 12 months. This includes our recent signing of the Climate Pledge, work done to transparently report on carbon emissions and our significant reduction of business travel targets."

• **DCR** (Email, replying to greenwashing concerns): "We achieved net zero on our Scope 1 and 2 + business travel emissions for the first time in 2020; We've set an internal carbon price for the first time this year ($25/ton scaling to a minimum of $100/ton by 2030) on business travel."

Disengagement

Examples of questions to which no replies were offered:

• **Director Project Management, Geofacets**
"I'm curious if there are particular fossil fuel companies that we've decided aren't adequately aligned enough with Paris to do business with, and are there ones that we've decided are?"

• **Global Environment Manager, RELX**
"Do you find any aspects of our stated policies to be misleading in any way?"

"What would that company [a business partner with substantial environmental and human rights violations] need to do to cross our threshold of not doing enough to demonstrate a responsible approach to managing environmental impact?"

"What is it our policies prohibit?"

• **Global Director Sustainability, Elsevier**
"Do you think those at the RELX level are misinterpreting the science or our policies?"

• **Managing Director STMJ, ELsevier**
"Calls we publish for petroleum companies, universities, and research institutes to develop deep oil and gas exploration is indeed relevant to the scientific community, but mainly to the extent that it has declared such activity to be incompatible with the 1.5°C target. One of the primary obstacles to tackling climate change and transforming energy systems is the abundance of fossil fuels. Our business currently aims to see that industry exceed its current production goals, goals that are wildly out of step with Paris. Taking paper use and travel down to zero would, unfortunately, do little to offset access to the new fossil fuel discoveries that we're now working towards. We can map the wholesome aspects of the company onto SDGs but, as research we publish also attests, mapping business activity onto voluntary sustainability initiatives does not move the needle in the prevention of harm. This is because businesses focus on goals and targets that maximize market opportunities while avoiding goals that may draw attention to problematic practices that it is not in their interest to change. This is one reason why none of the SDG goals are on track to be met.

I'm not implying that we aren't present in areas important for tackling the crisis. But the scientific community is unified in its assessment that new fossil fuel development, which we promote through publications, R&D, exhibitions etc., is incompatible with our Paris goal pledges. Wouldn't it be more productive to be accurate in our environmental self-assessment, if only to help educate employees about the severity of the challenges in place?"

• **Managing Director STMJ, ELsevier**
During an Elsevier STMJ Q&A in December 2020, the following question was asked: *"RELX's communication on progress regarding our adherence to the U.N. Global Compact states that we have "place[d] responsibility for execution of sustainability strategy in relevant corporate functions (procurement, government affairs, human resources, legal, etc) ensuring that no function is conflicting with company sustainability commitments and objectives." Should this statement be taken to mean REPAC political action is being audited and reformed to ensure alignment with the U.N.G.C. initiative, the S.D.G.'s, and other RELX commitments?"*

The answer given by an ICB member (excerpt): *"Broadly speaking, so the short answer is no, I don't know of any audit. Unpacking the question a little bit, the support in in for the SDGs at Elsevier and for RELX is very board and surely not focused to, for instance, the question at hand. At Elsevier it is...as wide as our support from the Elsevier Foundation, for instance the Africa Water First initiative. We have in our own group we have initiatives like the Green Chemistry Award. We released The Power of Data to advance SDG's and we've been pretty focal, actually, that research area around "No Hunger" [SDG], is in the research. In the journals, Peter Harrison—Peter, you lead the external climate board is another example. We are close to launching an Elsevier carbon footprint dashboard. And as you have seen, we have links—almost all our journals now to their significance and relevance to the SDGs. Now those are just a few examples there's much, much more happening. Also, at [the] RELX level this year is the year where we will have or the objective was to have 100% renewable energy for our electricity. There is for the RELX. There is the Lexis Nexis rule of law impact tracker and it gives a visualization too measure anything between corruption or child mortality or life expectations decrease when the rule of law is implemented. So we're pretty focal there as well. So these are just a few examples of how we how we support the SDGs. And again, the question here about how it relates to support of REPAC, which is the Reed Elsevier actions towards the American Congress, is not particularly part of it."*

A follow up question was posed by another attendee: *"Could you speak a bit more as to why the role of REPAC... is not being more closely scrutinized? REPAC has historically supported candidates/politicians whose positions are hostile to RELX corporate values. It creates cognitive dissonance when RELX says one thing about its values and then supports candidates who oppose those values. The contradiction is striking."*

Reply (excerpt):
"There is an internal review of our activities... I'll bring your question however to the US REGGA [Reed Elsevier Global Government Affairs] team and come back to you, OK?"

The attendee followed up with the speaker 8 months later and again didn't hear back; 4 months later the speaker retired.

• **Senior Management Team, Cell Press** (questions addressed to them in the Fall 2021 RGR):

GENERAL
In light of the latest climate science research, do you find any of Elsevier/RELX's business activity to be unethical and/or in violation of our environmental, health, human rights, and other policies? Do you find any of our stated policies to be inaccurate or misleading? Please explain why or why not.

INCOMBATIBILITY
When Elsevier shut down our war industry exhibitions, CEO Sir Crispin Davis said that "our presence here is incompatible with the aims of the science and medical communities." Are any of Elsevier/RELX's current activities also incompatible?

RISKS
Beyond the threat to the climate, do you consider any of Elsevier/RELX's business activity to be a threat to Cell Press? Do you find any of the risks described in the previous version of this report to be relevant to Cell Press, our customers, and our colleagues?

DISCLOSURE
Should we in any way be disclosing Elsevier's involvement in fossil fuel production and what we regard as acceptable negative environmental impacts to our customers—particularly ones whose research touches on these issues? What about to current and prospective employees? Is the company adequately providing information to investors and the general public that is suffcient to accurately evaluate our involvement in climate change-related human rights harms?

ANTI-RACISM
In 2020, systemic inequality prompted Cell Press to "ask what more we can do to fight prejudice and promote social justice," seeking to find "what we can do to be stronger allies, stronger anti-racists." As One Earth has testified, the effects of climate change "are not distributed equally. They disproportionately affect marginalized communities: the poor, the vulnerable, and the disadvantaged. In a world where systemic racism is endemic to global inequality, this generally means that minority ethnicities suffer the most." Is there opportunity for anti-racist action by Cell Press as it pertains to some of Elsevier/RELX's activities, partners, and customers discussed in these reports?

CONSENT
Is SMT able to provide evidence that the company has the informed consent of potentially effected people regarding Elsevier/RELX activities that are likely to have climate-related human rights impacts?

EXPLORATION
New Arctic oil exploration and extraction "requires specific R&D" and is inconsistent with a 1.5C target. Given our policies, should Elsevier/RELX be providing that R&D and publishing research that assesses and promotes new offshore oil and gas projects in the Arctic?

ADANI / BRAVUS
RELX provides the coal company Adani with resources that they describe as "vital" to their business. Are these resources we should be providing to Adani?

REPAC
REPAC received policy questions from Cell Press employees over a year ago, and then again via HR in February. We have yet to receive answers to them, despite the Code of Ethics indicating that ignoring employee concerns is a prohibited form of retaliation. Could SMT please assist in having REPAC provide us with written answers to these existing questions, along with any new questions from Cell Press employees, by the end of the year?

REPORTS
For those questioning the company's commitment to our policies, could SMT please speak to their understanding of the company's pledge to "refrain from discriminatory or disciplinary action against workers who make bona fide reports to management or, as appropriate, to the competent public authorities, on practices that contravene [our] policies"?

• **RELX Senior Leadership** (Request in the Fall 2021 RGR):
We stand with leadership in endorsing our existing policies and the obligations they entail. We recognize there are business implications associated with dissolving activities that conflict with them. We request the company share with employees a clear exit strategy with an associated timeline by the end of the current financial year (April 2022). Until we make this transition, withdrawing from or amending any existing policies and statements to accurately reflect our business will demonstrate a shared commitment to our code of ethics and operating principles.

ENDNOTES

1 Email regarding the Spring 2021 RGR.

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3 https://www.sciencedirect.com/science/article/pii/S2214629618305383

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11 https://www.brighttalk.com/webcast/13337/408134
On integrating BHP data with Geofacets research and data in a proprietary portal: "We know there's a need in industry today. The low hanging fruit is gone… ⅔ of the industry is looking to become more digital. And with digital, to normalize that information, get it into a place that analytics can be ran across it, [and] to potentially use predictive analytics to help find things that weren't found before. And that's really what Elsevier and Geofacets is good at. And along with some of our other customers, BHP has been a great partner with us in this project. And we are really looking forward to future phases with them and continued progress with our other customers."

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14 https://www.sciencedirect.com/... Journal of Cleaner Production

15 https://www.sciencedirect.com/... Journal of Business Research

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18 https://www.sciencedirect.com/... Public Relations Review

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https://www.opensocietyfoundations.org/voices/the-climate-emergency-demands-a-new-approach-to-investor-state-disputes
"Companies are even applying [ISDS's] to challenge progressive national climate policies, such as phasing out coal (Netherlands), banning off-shore oil drilling projects (Italy), or laws that put an end to fossil fuel extraction (France)."

40 Removed

41 https://www.all-energy.co.uk/

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"[QME] allowed us to make vital connections with the industry and provided us with a fantastic opportunity to speak about our project and the opportunities available." -Adani Australia

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