

July 14, 2022

International Sustainability Standards Board  
Columbus Building  
7 Westferry Circus  
Canary Wharf  
London, E14 4HD



**Re: International Sustainability Standards Board's (ISSB) Exposure Draft IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information (General Requirements Exposure Draft) and the Exposure Draft IFRS S2 Climate-related Disclosures (Climate Exposure Draft)**

Dear Sirs and Mesdames:

Honeytree Investment Management is committed to embedding and treating ESG data as core fundamental data in our portfolio construction process. We believe this data is essential for understanding and assessing the long term growth potential of a company. As one of a small number of women founded asset management firms in Canada, our goal is to build robust, concentrated, and high conviction strategies that focus on investing in the most responsibly growing companies in the world.

Our investment process identifies those companies where long-term financial success is inextricably linked to making a direct positive impact on the environment, employees, supply chains, customers, and society. In essence, our thesis of responsible growth is based on the idea that stakeholder governed companies are more purpose driven, provide more positive impact and ultimately grow more consistently and responsibly in the long term.

We use sustainability data such as workforce data and climate-related information to assess investment risks and opportunities of individual securities and to guide engagement activities. We want to invest in the companies that are leaders in sustainability, environmental management, and climate change mitigation. Much of the data that we would like to see is not yet comparable and consistent across companies.

We are very supportive of the ISSB leading this initiative by consolidating existing and well recognized reporting standards such as SASB and TCFD into a global harmonious standard of sustainability data reporting. We need a global and cohesive approach that aligns with the financial data that is disclosed.

We also call attention to the EU in their Corporate Sustainability Reporting Directive and the recent efforts by the SEC, and other jurisdictions in mandating approaches to ESG disclosures so that the ISSB can as much as possible ensure interoperability of the standards.

We appreciate the opportunity to share our thoughts and would be pleased to discuss in more detail our comments.

Thank you,

A handwritten signature in black ink, appearing to read 'Paula Glick', written in a cursive, flowing style.

Paula Glick  
Co-Founder  
Honeytree Investment Management  
[www.honeytreeinvest.com](http://www.honeytreeinvest.com)

