

UNIVERSAL STANDARDS

3. GOVERNANCE

**GRI 1: FOUNDATION 2021**

Introduces the purpose and system of the GRI Sustainability Reporting Standards (GRI Standards) and explains key concepts for sustainability reporting. It also specifies the requirements and reporting principles that organizations must comply with to report in accordance with the GRI Standards. Reporting Principles

\* Using the GRI Standards for Sustainability Reporting  
 \* Making claims related to the use of the GRI Standards

**GRI 2: GENERAL DISCLOSURES**

1. THE ORGANIZATION AND ITS REPORTING PRACTICES

**2-1: Organizational details \***

The organization shall:  
 a. report its legal name;  
 b. report its nature of ownership and legal form;  
 c. report the location of its headquarters;  
 d. report its countries of operation.

**2-2: Entities included in the organization's sustainability reporting \***

The organization shall:  
 a. list all its entities included in its sustainability reporting;  
 b. if the organization has audited consolidated financial statements or financial information filed on public record, specify the differences between the list of entities included in its financial reporting and the list included in its sustainability reporting;  
 c. if the organization consists of multiple entities, explain the approach used for consolidating the information, including:  
 i. whether the approach involves adjustments to information for minority interests; how the approach takes into account mergers, acquisitions, and disposal of entities or parts of entities;  
 ii. whether and how the approach differs across the disclosures in this Standard and across material topics.

**2-3: Reporting period, frequency and contact point \***

The organization shall:  
 a. specify the reporting period for, and the frequency of, its sustainability reporting;  
 b. specify the reporting period for its financial reporting and, if it does not align with the period for its sustainability reporting, explain the reason for this;  
 c. report the publication date of the report or reported information;  
 d. specify the contact point for questions about the report or reported information.

**2-4: Restatements of information \***

The organization shall:  
 a. report restatements of information made from previous reporting periods and explain:  
 i. the reasons for the restatements;  
 ii. the effect of the restatements.

**2-5: External assurance \***

The organization shall:  
 a. describe its policy and practice for seeking external assurance, including whether and how the highest governance body and senior executives are involved;  
 b. if the organization's sustainability reporting has been externally assured:  
 i. provide a link or reference to the external assurance report(s) or assurance statement(s);  
 ii. describe what has been assured and on what basis, including the assurance standards used, the level of assurance obtained, and any limitations of the assurance process;  
 iii. describe the relationship between the organization and the assurance provider

2. ACTIVITIES AND WORKERS

**2-6: Activities, value chain and other business relationships**

The organization shall:  
 a. report the sector(s) in which it is active;  
 b. describe its value chain, including:  
 i. the organization's activities, products, services, and markets served;  
 ii. the organization's supply chain;  
 iii. the entities downstream from the organization and their activities;  
 c. report other relevant business relationships;  
 d. describe significant changes in 2-6-a, 2-6-b, and 2-6-c compared to the previous reporting period.

**2-7: Employees**

The organization shall:  
 a. report the total number of employees, and a breakdown of this total by gender and by region;  
 b. report the total number of:  
 i. permanent employees, and a breakdown by gender and by region;  
 ii. temporary employees, and a breakdown by gender and by region;  
 iii. non-guaranteed hours employees, and a breakdown by gender and by region;  
 iv. full-time employees, and a breakdown by gender and by region;  
 v. part-time employees, and a breakdown by gender and by region;  
 c. describe the methodologies and assumptions used to compile the data, including whether the numbers are reported:  
 i. in head count, full-time equivalent (FTE), or using another methodology;  
 ii. at the end of the reporting period, as an average across the reporting period, or using another methodology;  
 d. report contextual information necessary to understand the data reported under 2-7-a and 2-7-b;  
 e. describe significant fluctuations in the number of employees during the reporting period and between reporting periods.

**2-8: Workers who are not employees**

The organization shall:  
 a. report the total number of workers who are not employees and whose work is controlled by the organization and describe:  
 i. the most common types of worker and their contractual relationship with the organization;

ii. the type of work they perform;  
 b. describe the methodologies and assumptions used to compile the data, including whether the number of workers who are not employees is reported:  
 i. in head count, full-time equivalent (FTE), or using another methodology;  
 ii. at the end of the reporting period, as an average across the reporting period, or using another methodology;  
 c. describe significant fluctuations in the number of workers who are not employees during the reporting period and between reporting periods.

**2-9: Governance structure and composition**

The organization shall:  
 a. describe its governance structure, including committees of the highest governance body;  
 b. list the committees of the highest governance body that are responsible for decision making on and overseeing the management of the organization's impacts on the economy, environment, and people;  
 c. describe the composition of the highest governance body and its committees by:  
 i. executive and non-executive members;  
 ii. independence;  
 iii. tenure of members on the governance body;  
 iv. number of other significant positions and commitments held by each member, and the nature of the commitments;  
 v. gender;  
 vi. under-represented social groups;  
 vii. competencies relevant to the impacts of the organization;  
 viii. stakeholder representation.

**2-10: Nomination and selection of the highest governance body**

The organization shall:  
 a. describe the nomination and selection processes for the highest governance body and its committees;  
 b. describe the criteria used for nominating and selecting highest governance body members, including whether and how the following are taken into consideration:  
 i. views of stakeholders (including shareholders);  
 ii. diversity;  
 iii. independence;  
 iv. competencies relevant to the impacts of the organization.

**2-11: Chair of the highest governance body**

The organization shall:  
 a. report whether the chair of the highest governance body is also senior executive in the organization;  
 b. if the chair is also a senior executive, explain their function within the organization's management, the reasons for this arrangement, and how conflicts of interest are prevented and mitigated.

**2-12: Role of the highest governance body in overseeing the management of impacts**

The organization shall:  
 a. describe the role of the highest governance body and of senior executives in developing, approving, and updating the organization's purpose, value or mission statements, strategies, policies, and goals related to sustainable development;  
 b. describe the role of the highest governance body in overseeing the organization's due diligence and other processes to identify and manage the organization's impacts on the economy, environment, and people, including:  
 i. whether and how the highest governance body engages with stakeholders to support these processes;  
 ii. how the highest governance body considers the outcomes of these processes;  
 c. describe the role of the highest governance body in reviewing the effectiveness of the organization's processes as described in 2-12-b and report the frequency of this review.

**2-13: Delegation of responsibility for managing impacts**

The organization shall:  
 a. describe how the highest governance body delegates responsibility for managing the organization's impacts on the economy, environment, and people, including:  
 i. whether it has appointed any senior executives with responsibility for the management of impacts;  
 ii. whether it has delegated responsibility for the management of impacts to other employees;  
 b. describe the process and frequency for senior executives or other employees to report back to the highest governance body on the management of the organization's impacts on the economy, environment, and people.

**2-14: Role of the highest governance body in sustainability reporting**

The organization shall:  
 a. report whether the highest governance body is responsible for reviewing and approving the reported information, including the organization's material topics, and if so, describe the process for reviewing and approving the information;  
 b. if the highest governance body is not responsible for reviewing and approving the reported information, including the organization's material topics, explain the reason for this.

**2-15: Conflicts of interest**

The organization shall:  
 a. describe the processes for the highest governance body to ensure that conflicts of interest are prevented and mitigated;  
 b. report whether conflicts of interest are disclosed to stakeholders, including, at a minimum, conflicts of interest relating to:  
 i. cross-board membership;  
 ii. cross-shareholding with suppliers and other stakeholders;  
 iii. existence of controlling shareholders;  
 iv. related parties, their relationships, transactions, and outstanding balances.

**2-16: Communication of critical concerns**

The organization shall:  
 a. describe whether and how critical concerns are communicated to the highest governance body;  
 b. report the total number and the nature of critical concerns that were communicated to the highest governance body during the reporting period.

**2-17: Collective knowledge of the highest governance body**

The organization shall:  
 a. report measures taken to advance the collective knowledge, skills, and experience of the highest governance body on sustainable development.

**2-18: Evaluation of the performance of the highest governance body**

The organization shall:  
 a. describe the processes for evaluating the performance of the highest governance body in overseeing the management of the organization's impacts on the economy, environment, and people;  
 b. report whether the evaluations are independent or not, and the frequency of the evaluations;  
 c. describe actions taken in response to the evaluations, including changes to the composition of the highest governance body and organizational practices.

**2-19: Remuneration policies**

The organization shall:  
 a. describe the remuneration policies for members of the highest governance body and senior executives, including:  
 i. fixed pay and variable pay;  
 ii. sign-on bonuses or recruitment incentive payments;  
 iii. termination payments;  
 iv. clawbacks;  
 v. retirement benefits;  
 b. describe how the remuneration policies for members of the highest governance body and senior executives relate to their objectives and performance in relation to the management of the organization's impacts on the economy, environment, and people.

**2-20: Process to determine remuneration**

The organization shall:  
 a. describe the process for designing its remuneration policies and for determining remuneration, including:  
 i. whether independent highest governance body members or an independent remuneration committee oversees the process for determining remuneration;  
 ii. how the views of stakeholders (including shareholders) regarding remuneration are sought and taken into consideration;  
 iii. whether remuneration consultants are involved in determining remuneration and, if so, whether they are independent of the organization, its highest governance body and senior executives;  
 b. report the results of votes of stakeholders (including shareholders) on remuneration policies and proposals, if applicable

**2-21: Annual total compensation ratio**

The organization shall:  
 a. report the ratio of the annual total compensation for the organization's highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individual);  
 b. report the ratio of the percentage increase in annual total compensation for the organization's highest-paid individual to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual);  
 c. report contextual information necessary to understand the data and how the data has been compiled.

**2-22: Statement on sustainable development strategy**

The organization shall:  
 a. report a statement from the highest governance body or most senior executive of the organization about the relevance of sustainable development to the organization and its strategy for contributing to sustainable development.

**2-23: Policy commitments**

The organization shall:  
 a. describe its policy commitments for responsible business conduct, including:  
 i. the authoritative intergovernmental instruments that the commitments reference;  
 ii. whether the commitments stipulate conducting due diligence;  
 iii. whether the commitments stipulate applying the precautionary principle;  
 iv. whether the commitments stipulate respecting human rights;  
 b. describe its specific policy commitment to respect human rights, including:  
 i. the internationally recognized human rights that the commitment covers;  
 ii. the categories of stakeholders, including at-risk or vulnerable groups, that the organization gives particular attention to in the commitment;  
 c. provide links to the policy commitments if publicly available, or, if the policy commitments are not publicly available, explain the reason for this;  
 d. report the level at which each of the policy commitments was approved within the organization, including whether this is the most senior level;  
 e. report the extent to which the policy commitments apply to the organization's activities and to its business relationships;  
 f. describe how the policy commitments are communicated to workers, business partners, and other relevant parties.

**2-24: Embedding policy commitments**

The organization shall:  
 a. describe how it embeds each of its policy commitments for responsible business conduct throughout its activities and business relationships, including:  
 i. how it allocates responsibility to implement the commitments across different levels within the organization;  
 ii. how it integrates the commitments into organizational strategies, operational policies, and operational procedures;  
 iii. how it implements its commitments with and through its business relationships;  
 iv. training that the organization provides on implementing the commitments.

**2-25: Processes to remediate negative impacts**

The organization shall:  
 a. describe its commitments to provide for or cooperate in the remediation of negative impacts that the organization identifies it has caused or contributed to;

b. describe its approach to identify and address grievances, including the grievance mechanisms that the organization has established or participates in;  
 c. describe other processes by which the organization provides for or cooperates in the remediation of negative impacts that it identifies it has caused or contributed to;  
 d. describe how the stakeholders who are the intended users of the grievance mechanisms are involved in the design, review, operation, and improvement of these mechanisms;  
 e. describe how the organization tracks the effectiveness of the grievance mechanisms and other remediation processes, and report examples of their effectiveness, including stakeholder feedback.

**2-26: Mechanisms for seeking advice and raising concerns**

The organization shall:  
 a. describe the mechanisms for individuals to:  
 i. seek advice on implementing the organization's policies and practices for responsible business conduct;  
 ii. raise concerns about the organization's business conduct.

**2-27: Compliance with laws and regulations**

The organization shall:  
 a. report the total number of significant instances of non-compliance with laws and regulations during the reporting period, and a breakdown of this total by:  
 i. instances for which fines were incurred;  
 ii. instances for which non-monetary sanctions were incurred;  
 b. report the total number and the monetary value of fines for instances of non-compliance with laws and regulations that were paid during the reporting period, and a breakdown of this total by:  
 i. fines for instances of non-compliance with laws and regulations that occurred in the current reporting period;  
 ii. fines for instances of non-compliance with laws and regulations that occurred in previous reporting periods;  
 c. describe the significant instances of non-compliance;  
 d. describe how it has determined significant instances of non-compliance

**2-28: Membership associations**

The organization shall:  
 a. report industry associations, other membership associations, and national or international advocacy organizations in which it participates in a significant role.

4. STAKEHOLDER ENGAGEMENT

**2-29: Approach to stakeholder engagement**

The organization shall:  
 a. describe its approach to engaging with stakeholders, including:  
 i. the categories of stakeholders it engages with, and how they are identified;  
 ii. the purpose of the stakeholder engagement;  
 iii. how the organization seeks to ensure meaningful engagement with stakeholders

**2-30: Collective bargaining agreements**

The organization shall:  
 a. report the percentage of total employees covered by collective bargaining agreements;  
 b. for employees not covered by collective bargaining agreements, report whether the organization determines their working conditions and terms of employment based on collective bargaining agreements that cover its other employees or based on collective bargaining agreements from other organizations.

**GRI 3: MATERIAL TOPICS**

**3-1: Process to determine material topics \***

The organization shall:  
 a. describe the process it has followed to determine its material topics, including:  
 i. how it has identified actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights, across its activities and business relationships;  
 ii. how it has prioritized the impacts for reporting based on their significance;  
 b. specify the stakeholders and experts whose views have informed the process of determining its material topics.

**3-2: List of material topics \***

The organization shall:  
 a. list its material topics;  
 b. report changes to the list of material topics compared to the previous reporting period.

**3-3: Management of material topics**

For each material topic reported under Disclosure 3-2, the organization shall:  
 a. describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights;  
 b. report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships;  
 c. describe its policies or commitments regarding the material topic;  
 d. describe actions taken to manage the topic and related impacts, including:  
 i. actions to prevent or mitigate potential negative impacts;  
 ii. actions to address actual negative impacts, including actions to provide for or cooperate in their remediation;  
 iii. actions to manage actual and potential positive impacts;  
 e. report the following information about tracking the effectiveness of the actions taken:  
 i. processes used to track the effectiveness of the actions;  
 ii. goals, targets, and indicators used to evaluate progress;  
 iii. the effectiveness of the actions, including progress toward the goals and targets;  
 iv. lessons learned and how these have been incorporated into the organization's operational policies and procedures;  
 f. describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e)

\* Reasons for omission are not permitted

## TOPIC STANDARDS

ECONOMIC	
<b>GRI 201 ECONOMIC PERFORMANCE 2016</b>	
201-1	Direct economic value generated and distributed
201-2	Financial implications and other risks and opportunities due to climate change
201-3	Defined benefit plan obligations and other retirement plans
201-4	Financial assistance received from government
<b>GRI 202 MARKET PRESENCE 2016</b>	
202-1	Ratios of standard entry level wage by gender compared to local minimum wage
202-2	Proportion of senior management hired from the local community
<b>GRI 203 INDIRECT ECONOMIC IMPACTS 2016</b>	
203-1	Infrastructure investments and services supported
203-2	Significant indirect economic impacts
<b>GRI 204 PROCUREMENT PRACTICES 2016</b>	
204-1	Proportion of spending on local suppliers
<b>GRI 205 ANTI-CORRUPTION 2016</b>	
205-1	Operations assessed for risks related to corruption
205-2	Communication and training about anti-corruption policies and procedures
205-3	Confirmed incidents of corruption and actions taken
<b>GRI 206 ANTI-COMPETITIVE BEHAVIOR 2016</b>	
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices
<b>GRI 207 TAX 2019</b>	
207-1	Approach to tax
207-2	Tax governance, control, and risk management
207-3	Stakeholder engagement and management of concerns related to tax
207-4	Country-by-country reporting
ENVIRONMENTAL	
<b>GRI 301 MATERIALS 2016</b>	
301-1	Materials used by weight or volume
301-2	Recycled input materials used
301-3	Reclaimed products and their packaging materials
<b>GRI 302 ENERGY 2016</b>	
302-1	Energy consumption within the organization

302-2	Energy consumption outside of the organization
302-3	Energy intensity
302-4	Reduction of energy consumption
302-5	Reductions in energy requirements of products and services
<b>GRI 303 WATER AND EFFLUENTS 2018</b>	
303-1	Interactions with water as a shared resource
303-2	Management of water discharge-related impacts
303-3	Water withdrawal
303-4	Water discharge
303-5	Water consumption
<b>GRI 304 BIODIVERSITY 2016</b>	
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas
304-2	Significant impacts of activities, products, and services on biodiversity
304-3	Habitats protected or restored
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations
<b>GRI 305 EMISSIONS 2016</b>	
305-1	Direct (Scope 1) GHG emissions
305-2	Energy indirect (Scope 2) GHG emissions
305-3	Other indirect (Scope 3) GHG emissions
305-4	GHG emissions intensity
305-5	Reduction of GHG emissions
305-6	Emissions of ozone-depleting substances (ODS)
305-7	Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions
<b>GRI 306 WASTE 2020</b>	
306-1	Waste generation and significant waste-related impacts
306-2	Management of significant waste-related impacts
306-3	Waste generated
306-4	Waste diverted from disposal
306-5	Waste directed to disposal
<b>GRI 308 SUPPLIER ENVIRONMENTAL ASSESSMENT 2016</b>	
308-1	New suppliers that were screened using environmental criteria
308-2	Negative environmental impacts in the supply chain and actions taken

SOCIAL	
<b>GRI 401 EMPLOYMENT 2016</b>	
401-1	New employee hires and employee turnover
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees
401-3	Parental leave
<b>GRI 402 LABOR/MANAGEMENT RELATIONS 2016</b>	
402-1	Minimum notice periods regarding operational changes
<b>GRI 403 OCCUPATIONAL HEALTH AND SAFETY 2018</b>	
403-1	Occupational health and safety management system
403-2	Hazard identification, risk assessment, and incident investigation
403-3	Occupational health services
403-4	Worker participation, consultation, and communication on occupational health and safety
403-5	Worker training on occupational health and safety
403-6	Promotion of worker health
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships
403-8	Workers covered by an occupational health and safety management system
403-9	Work-related injuries
403-10	Work-related ill health
<b>GRI 404 TRAINING AND EDUCATION 2016</b>	
404-1	Average hours of training per year per employee
404-2	Programs for upgrading employee skills and transition assistance programs
404-3	Percentage of employees receiving regular performance and career development reviews
<b>GRI 405 DIVERSITY AND EQUAL OPPORTUNITY 2016</b>	
405-1	Diversity of governance bodies and employees
405-2	Ratio of basic salary and remuneration of women to men
<b>GRI 406 NON-DISCRIMINATION 2016</b>	
406-1	Incidents of discrimination and corrective actions taken

<b>GRI 407 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING 2016</b>	
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk
<b>GRI 408 CHILD LABOR 2016</b>	
408-1	Operations and suppliers at significant risk for incidents of child labor
<b>GRI 409 FORCED OR COMPULSORY LABOR 2016</b>	
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor
<b>GRI 410 SECURITY PRACTICES 2016</b>	
410-1	Security personnel trained in human rights policies or procedures
<b>GRI 411 RIGHTS OF INDIGENOUS PEOPLES 2016</b>	
411-1	Incidents of violations involving rights of indigenous peoples
<b>GRI 413 LOCAL COMMUNITIES 2016</b>	
413-1	Operations with local community engagement, impact assessments, and development programs
413-2	Operations with significant actual and potential negative impacts on local communities
<b>GRI 414 SUPPLIER SOCIAL ASSESSMENT 2016</b>	
414-1	New suppliers that were screened using social criteria
414-2	Negative social impacts in the supply chain and actions taken
<b>GRI 415 PUBLIC POLICY 2016</b>	
415-1	Political contributions
<b>GRI 416 CUSTOMER HEALTH AND SAFETY 2016</b>	
416-1	Assessment of the health and safety impacts of product and service categories
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services
<b>GRI 417 MARKETING AND LABELING 2016</b>	
417-1	Requirements for product and service information and labeling
417-2	Incidents of non-compliance concerning product and service information and labeling
417-3	Incidents of non-compliance concerning marketing communications
<b>GRI 418 CUSTOMER PRIVACY 2016</b>	
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data

The Topic Standards are no longer organized into the 200 (Economic topics), 300 (Environmental topics), and 400 (Social topics) series. However, we have kept this categorization to help the reader better understand the flow of the Standards.

### Reporting in accordance with the GRI Standards

#### Overview of in accordance requirements:

- Requirement 1: Apply the reporting principles
- Requirement 2: Report the disclosures in GRI 2: General Disclosures 2021
- Requirement 3: Determine material topics
- Requirement 4: Report the disclosures in GRI 3: Material Topics 2021
- Requirement 5: Report disclosures from the GRI Topic Standards for each material topic
- Requirement 6: Provide reasons for omission for disclosures and requirements that the organization cannot comply with
- Requirement 7: Publish a GRI content index
- Requirement 8: Provide a statement of use
- Requirement 9: Notify GRI

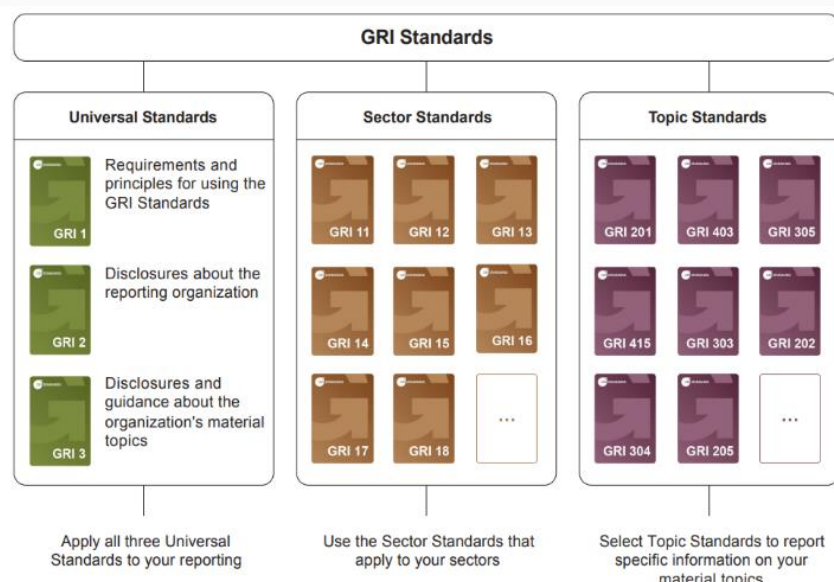
#### Reasons for omission

If the organization cannot comply with a disclosure or with a requirement in a disclosure for which reasons for omission are permitted, the organization shall in the GRI content index:

- i. specify the disclosure or the requirement it cannot comply with;
- ii. provide one of the four reasons for omission included in Table and the required explanation for that reason.

Reasons for omission are permitted for all disclosures from the GRI Standards except for:

- Disclosure 2-1 Organizational details
- Disclosure 2-2 Entities included in the organization's sustainability reporting
- Disclosure 2-3 Reporting period, frequency and contact point
- Disclosure 2-4 Restatements of information
- Disclosure 2-5 External assurance
- Disclosure 3-1 Process to determine material topics
- Disclosure 3-2 List of material topics



REASON FOR OMISSION	REQUIRED EXPLANATION
<b>Not applicable</b>	Explain why the disclosure or the requirement is considered not applicable.
<b>Legal prohibitions</b>	Describe the specific legal prohibitions.
<b>Confidentiality constraints</b>	Describe the specific confidentiality constraints.
<b>Information unavailable / incomplete</b>	Specify which information is unavailable or incomplete. When the information is incomplete, specify which part is missing (e.g., specify the entities for which the information is missing). Explain why the required information is unavailable or incomplete. Describe the steps being taken and the expected time frame to obtain the information.

#### Reporting Principles

The reporting principles are fundamental to achieving high-quality sustainability reporting. Therefore, an organization is required to apply the reporting principles to be able to claim that it has prepared the reported information in accordance with the GRI Standards. The reporting principles guide the organization in ensuring the quality and proper presentation of the reported information. High-quality information allows information users to make informed assessments and decisions about the organization's impacts and its contribution to sustainable development. Each reporting principle consists of a requirement and guidance on how to apply it.

- Accuracy
- Balance
- Clarity
- Comparability
- Completeness
- Sustainability context
- Timeliness
- Verifiability