GRI Standards Alignment Check Services

Methodology

Disclaimer: GRI Services do not verify, check or pass judgment on the quality of the disclosures within a report nor the process of preparing the disclosures. That responsibility remains with the reporting organization and its stakeholders. GRI’s Services are not an external assurance engagement, although are complementary. GRI does not carry any legal responsibility for the implementation of the feedback by the organization. The GSSB is an independent operating entity under the auspices of GRI and has sole responsibility for setting globally accepted standards for sustainability reporting and as such has no involvement with the delivery of GRI Services.
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1. INTRODUCTION

1.1. How to use this document
This document outlines the methodology for GRI Standards Alignment Check Services: Content Index Service, Management Approach Disclosures Service, Materiality Disclosures Service, and SDG Mapping Service.

Methodology requirements common to all Standards Alignment Check Services are presented to Section 1 of this document. Reporting organizations and/or third parties that work with GRI in a Standards Alignment Check Services should consult section 1 of the Methodology, together with the applicable section(s) for the Services(s) performed:

- Content Index Service (section 2, pg. 5)
- Management Approach Disclosures Service (section 3, pg. 7)
- Materiality Disclosures Service, (section 4, pg. 8)
- SDG Mapping Service (section 5, pg. 11).

1.2. Scope of Standards Alignment Check Services
GRI Standards Alignment Check Services focus on reviewing the alignment of references between the GRI content index and the reported materials. The extend of references reviewed depends on the Service performed.

The following areas are outside the scope of all GRI Standards Alignment Check Services:
- The actual content of the reported materials
- Verifying the quality of the reported information
- Verifying the process of preparing the disclosures
- Verifying the location and the referencing of additional reporting frameworks (linkages with the Sustainable Development Goals can be reviewed as part of the SDG Mapping Service).

1.3. Disclaimer for Standards Alignment Check Services
GRI Services do not verify, certify, check or pass judgment on the quality of the disclosures within a report nor the process of preparing the disclosures. That responsibility remains with the reporting organization and its stakeholders. GRI’s Services are not an external assurance although are complementary. GRI does not carry any legal responsibility for the implementation of the feedback by the organization. The GSSB is an independent operating entity under the auspices of GRI and has sole responsibility for setting globally accepted standards for sustainability reporting and as such has no involvement with the delivery of GRI Services.

GRI Standards Alignment Check Services focus on reviewing the alignment of references between the GRI content index and the reported materials.

GRI reserves the right to constantly review and update the Terms & Conditions and Methodology of Services offered. Reporting organizations are asked to review these documents which are valid at the time of Service performance.
1.4. **GRI content index in Standards Alignment Check Services**

The GRI content index should be included in all reports submitted for the Standards Alignment Check Services, whether these are published as pdfs, paper-based reports or online. In all reports, the GRI content index should be clearly visible to allow GRI report users to quickly find the information that they are looking for.

To enhance the clarity of disclosed information, GRI advises using the example GRI content index, as presented on page 40 of GRI 102: General Disclosures 2016. The structure and presentation of the index will be reviewed as part of the Services Standards Alignment Check Services. It is strongly advised to maintain consistency within the rows and columns of the content index to ensure that report users understand how to read the information.

Information for a required disclosure might already be included in other materials prepared by the reporting organization, such as its annual report. In this case, an organization can choose to not repeat these disclosures in its sustainability report, but instead give a reference to where the information can be found in the GRI content index. This approach is acceptable as long as the reference is specific, publicly available and readily accessible. For example, a reference to the annual report is acceptable when it includes the page number, section name, or other specific indication of where to find the information.

Both electronic, web-based reports, as well as paper reports are appropriate media for reporting. Organizations may choose to use a combination of web- and paper-based reports or use only one medium. At least one medium (web or paper) should provide users with access to the complete set of information for the reporting period as listed in the GRI content index.

1.5. **Disclosure labels**

To review the alignment of references, Reporting organizations must include disclosure labels for all disclosures in the scope of the Service(s) performed, in the text of the reported information.

Disclosure labels are references that indicate to report readers where a specific disclosure is addressed in the body of the report. The labels help report readers locate information and are a means by which reporting organizations can make their reports more transparent by making their disclosures easier to find.

The use of disclosure labels is not required by the GRI Standards for reports to be in accordance. However, to apply for the GRI Standard Alignment Check Services, the use of disclosure labels is required.

GRI uses the disclosure labels to confirm that the referenced disclosures within the scope of each Service are in the correct locations as indicated in the content index.

The disclosure labels can be incorporated in the report in different ways; they can be included directly in the text, in the footnotes, subscript or superscript, next to chapter or subchapter titles. Another option would be to incorporate the labels in the layout solutions. The format can be chosen by the reporting organization as long as it is clear, consistent and includes the number for each disclosure. Some examples of labels are: GRI 102-10, 303-3, Disclosure 102-10.
All reports submitted for GRI Services must include the disclosure labels on pages in the text of reported materials, for all pages referenced in the GRI content index. If a disclosure is explained over a range of pages, the disclosure label should be used on all pages.

1.6. References to GRI, the GRI Standards and GRI Services

As part of the Standards Alignment Check Services, the report is also reviewed for inappropriate, unclear or confusing language related to GRI, the GRI Services, the scope of the GRI Services or the GRI Standards. The reporting organization is asked to remove such language from the report. More information is included in the Terms and Conditions and Communications protocol.

Additional information on the scope of each Standard Alignment Check Service is provided in the relevant sections of this document.

2. Content Index Service

2.1. Scope of Service

The Content Index Service helps report preparers improve the accuracy and usability of the GRI content index. In this Service, GRI reviews that the GRI content index is clearly presented and the references for all disclosures included align with the appropriate sections in the body of the report. The scope of the GRI Content Index Service includes all disclosures listed in the GRI content index. Through this Service, GRI will confirm that all required GRI disclosures can be found both in the content index and in the report as indicated by the disclosure labels.

2.2. What is reviewed?

The review for the Service applies to all disclosures listed in the GRI content index.

The Service reviews the accuracy of the GRI content index in 4 steps:

**STEP 1: Is the GRI content index included in the Report, in line with the requirements set out in Disclosure 102-55? Is Disclosure 102-54 addressed?**

In the scope of the Content Index Service, GRI Services reviews, if the GRI content index is included in the report, in line with the requirements set out in Disclosure 102-55 and relevant clause 6.3. The following are reviewed:

- Is the GRI content index included in the report (clause 6.3.2, 6.3.3)?
- Are the words ‘GRI Content Index’ in the title of the index (clause 6.3.1)?
- Are the titles and publication of all Standards used found in the index, including GRI 101: Foundation 2016? Are these references as appearing in the relevant GRI Standards (102-55, clause 6.3.4, clause 6.3.5)?
- Is the number of the disclosure included for each disclosure and are there references for all disclosures included in the index?
- Are the relevant disclosures, as per the self-declared adherence level (Core or Comprehensive option) referenced in the GRI content index?
If the report is drafted in a language where the GRI Standards are not available, GRI Services will rely on the reporting organization to confirm that any relevant terms are directly translated from the GRI Standards (in English).

Additionally, the claim included under Disclosure 102-54 is reviewed as part of Step 1. This is because, as per Disclosure 102-54, ‘Claims of reporting in accordance with the GRI Standards’, reporting organizations are required to use the set wording for the claim used, as indicated in the GRI Standards. For languages that currently have no translation available, an exact translation from the English version of the claim used is required.

Reporting organizations are not required to include the full titles for each disclosure they report on, for the purposes of this Service.

**STEP 2: Are the references to the location all disclosures clearly displayed in the GRI content index?**

In Step 2 of the GRI Content Index Service, it is reviewed whether references for all disclosures listed in the GRI content index are:

- Clear and specific (e.g. include page number, title of section/tables, title and year of publication of documents).
- Publicly accessible and readily available (and active for URLs)
- Understood as direct answers and not as omissions, where and if direct answers are included.

It is required to include the page numbers and/or URLs for all disclosures listed in the GRI content index. Direct answers are also acceptable. It is important to keep in mind that too much text in the GRI content index can diminish its clarity and function as a navigation tool.

**STEP 3: Where applicable, and if permitted, are the reasons for omission provided in line with the Standards?**

Reasons for omission may in exceptional cases apply for certain disclosures (GRI 101: Foundation 2016, section 3.1, Table 1, pg. 30).

In the Content Index Service, GRI Services reviews if the GRI content index clearly presents, where applicable and if permitted:

- The part of the disclosure omitted,
- The permitted reason for omission (as listed in GRI 101: Foundation 2016, clause 3.2)
- A reference to where the required explanation omission (as listed in GRI 101: Foundation 2016, clause 3.2) can be found in the reported materials or the required explanation as a direct answer.

GRI advises including reasons for omission in a separate column in the GRI content index in order to increase the transparency and clarity of the omitted information. A suggested format, to clearly present the omissions, can be found in the Guidance section of Disclosure 102-55 from GRI 102: General Disclosures 2016.

It is important to keep in mind that, if an organization omits a large number of required disclosures, this can reduce the credibility of the report and its usefulness to stakeholders.
STEP 4: Are disclosures clearly labelled in the text of the reported materials?

The Service reviews whether, at the time of publication of the report, all disclosures are correctly located in both the GRI content index and in the text of the final report, with the use of disclosure labels. The use of disclosure labels is outlined in section 1.5 of this document.

Finally, references to GRI, the GRI Standards and GRI Services as well as the location of the organizational mark and statement is reviewed.

3. Management Approach Disclosures Service

3.1. Scope of the Service

The Management Approach Disclosures Service focuses exclusively on management approach disclosures from GRI 103: Management Approach 2016 as well as management approach disclosures from topic-specific Standards. The Service reviews whether, at the time of publication of the report, management approach disclosures are correctly located in both the GRI content index and in the text of the final report.

3.2. What is reviewed?

The Management Approach Disclosures Service reviews all references to management approach included in the GRI content index. The Service is performed in 3 steps:

STEP 1: Is the GRI content index included in the Report, in line with the requirements set out in Disclosure 102-55? Is Disclosure 102-54 addressed?

In the scope of the Management Approach Disclosures Service, GRI Services reviews, if the GRI content index is included in the report, in line with the requirements set out in Disclosure 102-55 and relevant clause 6.3. The following are reviewed:

- Is the GRI content index included in the report (clause 6.3.2, 6.3.3)?
- Are the words ‘GRI Content Index’ in the title of the index (clause 6.3.1)?
- Are the titles and publication years of all Standards used found in the index, including GRI 101: Foundation 2016? Are these references as appearing in the relevant GRI Standards (102-55, clause 6.3.4, clause 6.3.5)?
- Is the number of the disclosure included for each disclosure and are there references for all disclosures included in the index?
- Are the relevant management approach disclosures, as per the self-declared adherence level (Core or Comprehensive option) referenced in the GRI content index?
- Are references to management approach disclosures included for all material topics (including for additional material topics as per clause 6.3.5)?
- Does the structure of the index clearly show which material topics are covered by the management approach disclosures?
If the report is drafted in a language where the GRI Standards are not available, GRI Services will rely on the reporting organization to confirm that any relevant terms are directly translated from the GRI Standards (in English).

Additionally, the claim included under Disclosure 102-54 is reviewed as part of Step 1. This is because, as per Disclosure 102-54, ‘Claims of reporting in accordance with the GRI Standards’, reporting organizations are required to use the set wording for the claim used, as indicated in the GRI Standards. For languages that currently have no translation available, an exact translation from the English version of the claim used is required.

Reporting organizations are not required to include the full titles for each disclosure they report on, for the purposes of this Service.

**STEP 2: Are the references to management approach disclosures clearly displayed in the GRI content index?**

In Step 2 of the GRI content index Service, it is reviewed whether references for all management approach disclosures listed in the GRI content index are:

- Clear and specific (e.g. include page number, title of section/tables, title and year of publication of documents).
- Publicly accessible and readily available (and active for URLs)
- Understood as direct answers and not as omissions, where and if direct answers are included. Disclosure 103-1 does not permit for reasons for omission.

It is required to include the page numbers and/or URLs for all disclosures listed in the GRI content index. Direct answers are also acceptable. It is important to keep in mind that too much text in the GRI content index can diminish its clarity and function as a navigation tool.

If the management approach is combined for multiple topics it will be reviewed whether this is clearly shown in the GRI content index. The references to management approach disclosures from topic-specific Standards will also be reviewed.

Additionally, for management approach disclosures that are omitted – where applicable and if permitted- the Service will review if the index clearly states:

- The part of the disclosure omitted,
- The permitted reason for omission (as listed in GRI 101: Foundation 2016, clause 3.2)
- A reference to where the required explanation omission (as listed in GRI 101: Foundation 2016, clause 3.2) can be found in the reported materials or the required explanation as a direct answer.

GRI advises including reasons for omission in a separate column in the GRI content index to increase the transparency and clarity of the omitted information. A suggested format, to clearly present the omissions, can be found in the Guidance section of Disclosure 102-55.

It is important to keep in mind that, if an organization omits a large number of required disclosures, this can reduce the credibility of the report and its usefulness to stakeholders.

**STEP 3: Are management disclosures clearly labelled in the text of the reported materials?**
In Step 3, the Management Approach Service reviews whether, at the time of publication of the report, all disclosures in the scope of the service are correctly located in both the GRI content index and in the text of the final report, with the use of disclosure labels. The use of disclosure labels is outlined in section 1.5 of this document.

Finally, references to GRI, the GRI Standards and GRI Services as well as the location of the organizational mark and statement is reviewed.

4. Materiality Disclosures Service

4.1. Scope of Service

The Materiality Disclosures Service focuses exclusively on Disclosures 102-40 to 102-49 from GRI 102: General Disclosures 2016. The Service reviews whether, at the time of publication of the report, Disclosures 102-40 to 102-49 are correctly located in both the GRI content index and in the text of the final report.

4.2. What is reviewed?

The Materiality Disclosures Service focuses on Disclosures 102-40 to 102-49, appearing in sections Stakeholder Engagement and Reporting Practice of GRI 102: General Disclosures 2016.

Disclosures 102-40 to 102-44 (found on pg. 29-32 of GRI 102), provide an overview of the organization’s stakeholder engagement both during the reporting period and during part of the daily operations of the organization.

Disclosure 102-45 to 102-49 (found on pg. 33-36 of GRI 102), give an overview of the process that an organization has followed to define the content of its sustainability report.

The Materiality Disclosures Service is performed in 3 steps:

STEP 1: Is the GRI content index included in the report, in line with the requirements set out in Disclosure 102-55? Is Disclosure 102-54 addressed?

In the scope of this Service, GRI Services reviews, if the GRI content index is included in the report, in line with the requirements set out in Disclosure 102-55 and relevant clause 6.3. The following are reviewed:

- Is the GRI content index included in the report (clause 6.3.2, 6.3.3)?
- Are the words ‘GRI Content Index’ in the title of the index (clause 6.3.1)?
- Are the titles and publication of all Standards used found in the index, including GRI 101: Foundation 2016? Are these references as appearing in the relevant GRI Standards (102-55, clause 6.3.4, clause 6.3.5)?
- Is the number of the disclosure included for each disclosure and are there references for all disclosures included in the index?

If the report is drafted in a language where the GRI Standards are not available, GRI Services will rely on the reporting organization to confirm that any relevant terms are directly translated from the GRI Standards (in English).

Additionally, the claim included under Disclosure 102-54 is reviewed as part of Step 1. This is because, as per Disclosure 102-54, ‘Claims of reporting in accordance with the GRI Standards’, reporting organizations are required to use the set wording for the claim used, as indicated in the
GRI Standards. For languages that currently have no translation available, an exact translation from the English version of the claim used is required.

Reporting organizations are not required to include the full titles for each disclosure they report on, for the purposes of this Service.

**STEP 2: Are the references to the location of Disclosures 102-40 to 102-49 clearly displayed in the GRI content index?**

In the Service it is reviewed whether references for disclosures in the scope of the Service are:

- Clear and specific (e.g. include page number, name of section/tables, title and year of publication of documents).
- Publicly accessible and readily available (and active for URLs). This also applies to references to external documents.
- Understood as direct answers and not as omissions, if and where applicable. This is because Disclosures 102-40 to 102-49 do not permit for reasons for omissions.

It is required to include the page numbers and/or URLs for Disclosures 102-40 to 102-49. Direct answers are also acceptable. It is important to keep in mind that too much text in the GRI content index can diminish its clarity and function as a navigation tool.

**STEP 3: Are Disclosures 102-40 to 102-49 clearly labelled in the text of the reported materials?**

The Service reviews whether, at the time of publication of the report, Disclosures 102-40 to 102-49 are correctly located in both the GRI content index and in the text of the final report, with the use of disclosure labels. The use of disclosure labels is outlined in section 1.5 of this document.

Finally, references to GRI, the GRI Standards and GRI Services as well as the location of the organizational mark and statement is reviewed.

### 5. SDG Mapping Service

#### 5.1. Scope of Service

The SDG Mapping Service focuses exclusively on those GRI disclosures where reporting organizations have indicated their reference to the Sustainable Development Goals (SDGs). After going through the Service, GRI will confirm that the SDGs, based on the SDG Compass Annex: Linking the SDGs and the GRI Standards document, and the GRI Disclosures are correctly mapped and that these disclosures are easily traceable in the report.

#### 5.2. What is reviewed?

The SDG Mapping Service confirms that SDGs are correctly mapped against the disclosures and that these disclosures are easily traceable in the report.

The review process is reflected in the following 4 Steps:
STEP 1: Is the GRI content index included in the Report, in line with the requirements set out in Disclosure 102-55? Is Disclosure 102-54 addressed?

In the scope of the SDG Mapping Service, GRI Services reviews, if the GRI content index is included in the report, in line with the requirements set out in Disclosure 102-55 and relevant clause 6.3. The following are reviewed:

- Is the GRI content index included in the report (clause 6.3.2, 6.3.3)?
- Are the words ‘GRI Content Index’ in the title of the index (clause 6.3.1)?
- Are the titles and publication of all Standards used found in the index, including GRI 101: Foundation 2016? Are these references as appearing in the relevant GRI Standards (102-55, clause 6.3.4, clause 6.3.5)?
- Is the number of the disclosure included for each disclosure and are there references for all disclosures included in the index?
- Is additional information, noting the linkage of the SDGs to the GRI disclosures, included in the GRI content index?

If the report is drafted in a language where the GRI Standards are not available, GRI Services will rely on the reporting organization to confirm that any relevant terms are directly translated from the GRI Standards (in English).

Additionally, the claim included under Disclosure 102-54 is reviewed as part of Step 1. This is because, as per Disclosure 102-54, ‘Claims of reporting in accordance with the GRI Standards’, reporting organizations are required to use the set wording for the claim used, as indicated in the GRI Standards. For languages that currently have no translation available, an exact translation from the English version of the claim used is required.

Reporting organizations are not required to include the full titles for each disclosure they report on, for the purposes of this Service.

For the purposes of this Service, the content index must include additional information indicating how the relevant SDGs are addressed within the GRI disclosures. Additional information, such as the linkage to the SDGs, can be added to the GRI content index, as long as it does not confuse readers, or obscure the functionality or contents of the content index.

STEP 2: Are the linkages to the SDGs included in the GRI content index accurate?

Linkages between the SDGs and GRI disclosures must align with the mapping set out in the SDG Compass Annex: Linking the SDGs and the GRI Standards.

The following are reviewed in Step 2 of the SDG Mapping Service:

- Is the presentation of SDG linkages specific, indicating the number of each goal?
- Where applicable, is each GRI disclosures matched to a minimum of one SDG?
- Are linkages to SDGs in line with the SDG Compass Annex: Linking the SDGs and the GRI Standards.

The title of each SDG, and business theme can also be mentioned. No interpretation or abbreviation of the text in the titles of the SDGs is allowed. Relevant targets may also be mentioned. In case targets are included in the index, these will also be reviewed as part of the Service.

In some cases, GRI disclosures can be linked to multiple SDGs. For instance: Disclosure 203-2 can be linked, among others, to goal #1 ‘End poverty in all its forms everywhere’ and goal #8 ‘Promote
sustained, inclusive and sustainable economic growth’, full and productive employment and decent work for all’. It is not required to link the Disclosure 203-2 to both goals. The reporting organization will need to assess which goal/s are more relevant for them.

It is also not required to link management approach disclosures to all the goals that there is a link to. The Reporting organization will need to assess which goals are relevant to the management approach disclosures and include these links to the index in their report.

**STEP 3: Are the references to the location of SDG-linked disclosures clearly displayed in the content index?**

In the Service it is reviewed whether the references for disclosures in the scope of the Service are:

- Clear and specific (e.g. include page number, name of section/tables, name and year of publication of documents).
- Publicly accessible and readily available (and active for URLs). This also applies to references to external documents.
- Understood as direct answers and not as omissions, if and where applicable.

It is required to include the page numbers and/or URLs for all SDG-linked disclosures. Direct answers are also acceptable. It is important to keep in mind that too much text in the GRI content index can diminish its clarity and function as a navigation tool.

Additionally, for SDG-linked disclosures that are omitted – where applicable and if permitted, the Service will review if the index clearly states:

- The part of the disclosure omitted,
- The permitted reason for omission (as listed in GRI 101: Foundation 2016, clause 3.2)
- A reference to where the required explanation omission (as listed in GRI 101: Foundation 2016, clause 3.2) can be found in the reported materials or the required explanation as a direct answer.

GRI advises including reasons for omission in a separate column in the GRI content index in order to increase the transparency and clarity of the omitted information. A suggested format, to clearly present the omissions, can be found in the Guidance section of Disclosure 102-55.

It is important to keep in mind that, if an organization omits a large number of required disclosures, this can reduce the credibility of the report and its usefulness to stakeholders.

**STEP 4: Are SDG-linked disclosures clearly labelled in the text of the reported materials?**

The Service reviews whether, at the time of publication of the report, SDG-linked disclosures are correctly located in both the GRI content index and in the text of the final report, with the use of disclosure labels. The use of disclosure labels is outlined in section 1.5 of this document.

Finally, references to GRI, the GRI Standards and GRI Services as well as the location of the organizational mark and statement is reviewed.
6. ADDITIONAL RESOURCES

Please also review the Standards Alignment Check Terms and Conditions, Communications Protocol and GRI Services Pricing Policy before you apply for a Service.

7. CONTACT

Any questions or comments should be sent to GRI’s Services Team by email at reportservices@globalreporting.org.

7.1 Communication with GRI as a GRI Services Client

Reporting organizations that sign-up for GRI Services provide GRI with a contact person, in the sign-up form, that is the main contact person during the course of the Service. As a benefit of receiving a Service from GRI, designated contact persons for the Reporting organizations may receive communications such as but not limited to: information on how to improve the current or future reports, other Services that they may benefit from to improve their future report, customer satisfaction surveys related to the Service or information to help the Reporting organization notify GRI Standards for their report. These communications can happen during this Service, as a follow-up of the Service or after the Service is completed. If at any point, the Reporting organization and designated contact person would not like to benefit from these communications and would like to stop receiving these messages, they can let GRI Services Team know via email at: reportservices@globalreporting.org