

GRI Topic Standard Project for Economic Impact – Public comment period FAQs

Frequently asked questions for the following exposure drafts:

- [Competition](#)
- [Corruption](#)
- [Public Policy](#)

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Economic Impact Project

Why is GRI revising the economic impact standards? What are the project's aims?

1. The objective of the economic impact project is to review and revise all GRI economic impact-related Standards and incorporate new issues to reflect stakeholder expectations for reporting the organization's impact on the economy. The economic impact project is divided into three sets of thematic Standards to allow targeted messaging and stakeholder engagement during the public comment periods. This ensures the workload is manageable for stakeholders and GRI reporters worldwide reviewing the draft Standards during public inquiry, the GSSB, the working group, the GRI Standards Division, and other GRI divisions. Economic impact project details can be found in the [project proposal](#).
2. The review of GRI 205: Anti-corruption 2016, GRI 206: Anti-competitive behavior 2016, and GRI 415: Public Policy 2016 in the Phase 2 of the economic impact project, aims to represent internationally agreed best practice and align with authoritative intergovernmental instruments related to an organization's impact on the economy, and institutions that govern market mechanisms such as the United Nations (UN) Guiding Principles on Business and Human Rights (Guiding Principles, UNGPs) and the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.
3. As part of the GSSB Work Program 2023-2025, the Global Sustainability Standards Board (GSSB) identified the review of GRI 205: Anti-corruption 2016, GRI 206: Anti-competitive behavior 2016, and GRI 415: Public Policy 2016 as a priority project for commencement in 2023. Since the GRI disclosures on Economic Performance were last revised, the issue of economic impact has received significant attention in the global sustainable development agenda. In line with the GSSB [Due Process Protocol](#), a multi-stakeholder working group was established in January 2024 to contribute to the review and content development.
4. For more information on the project, consult the [project website](#) and [Terms of Reference](#) of the [Working Group](#).

What GRI Topic Standards are being revised in the Economic Impact project?

The Topic Standards project for Economic Impact encompasses a review of the following GRI Topic Standards:

- GRI 201: Economic Performance 2016
- GRI 205: Anti-Corruption 2016
- GRI 206: Anti-Competitive Behavior 2016

- GRI 415: Public Policy 2016
- GRI 202: Market Presence 2016
- GRI 203: Indirect Economic Impacts 2016
- GRI 204: Procurement 2016

When will these standards be published? When will the final Economic Impact Standards be ready?

The Standard(s) in the Phase 1 of the project is slated to be published in Q3 of 2026. The Standards in Phase 2 of the economic impact project are slated to be published in Q4 of 2026. The specific timeline will depend on the extent of the feedback received during the public comment period. The effective date for these Standards is still to be determined but will allow for an appropriate transition time.

Which standards are in each Phase of the economic impact project?

Phase 1: Distributed value

- GRI 201: Economic performance, 2016

Phase 2: Impact on institutions

- GRI 205: Corruption, 2016
- GRI 206: Competition, 2016
- GRI 415: Public Policy, 2016

Phase 3: Economic multiplier, jobs, and goods and services

- GRI 202: Market Presence 2016
- GRI 203: Indirect Economic Impacts 2016
- GRI 204: Procurement 2016

How are the revised GRI Economic Impact Standards aligned with the ESRS?

We aim for alignment and interoperability between GRI Standards and the ESRS where possible. In November 2023, GRI and EFRAG signed a new Memorandum of Understanding (MoU), which substantiates the benefits of the alignment achieved between the ESRS and the GRI Standards. The ESRS-GRI Standards data point mapping maps each and every ESRS data point to the corresponding data point in the GRI Standards.

Economic Impact Project: Phase 2 standards

What do the Standards cover?

Phase 2 of the Topic Standards Project for Economic Impact cover GRI's Corruption, Competition and Public Policy related Standards.

- GRI Corruption exposure draft: The exposure draft covers how an organization manages its corruption related impacts; organizations are also required to report on the results of their corruption risk assessment process, the instances of confirmed incidents of corruption as well as the training and education provided to employees and workers to prevent corruption.
- GRI Competition exposure draft: The exposure draft covers the management of competition related impacts by an organization; organizations are also required to report legal actions that they have faced due to anti-competitive behavior, and training and communications regarding anti-competitive behavior that they provide to governance body members, employees and workers.
- GRI Public Policy exposure draft: The exposure draft covers the topics that are important to the organizations and their policy positions on those topics. Moreover, the draft also requires organizations to disclose the processes that it has in place to ensure alignment between its activities and public policy positions, and finally the exposure draft covers what and how much organizations spend on public policy engagements and activities.

Why have the names of the Standards changed?

The names of the draft Standards have been changed to align with how the topics are discussed in international authoritative instruments and furthermore, to align with GRI nomenclature.

Do the Standards align with other GRI Topic Standards?

Where possible, we have attempted to align the requirements in the Standards with other global and regional standard setters to ensure consistency and interoperability.

Which authoritative instruments are included in the Phase 2 of Standards?

The following international intergovernmental authoritative instruments have been used in the Phase 2 of the Standards:

- The Financial Action Task Force and Organization for Economic Co-operation and Development (OECD), FAFT Guidance on Transparency and Beneficial Ownership, 2014.

- Organisation for Economic Co-operation and Development (OECD), Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, 1997.
- Organisation for Economic Co-operation and Development (OECD), Good Practice Guidance on Internal Controls, Ethics, and Compliance, 2021.
- Organisation for Economic Co-operation and Development (OECD), OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, 2023.
- United Nations (UN), Convention against Corruption, 2003.
- Organisation for Economic Co-operation and Development (OECD), Lobbying in the 21st Century: Transparency, Integrity and Access, 2021.
- Organisation for Economic Co-operation and Development (OECD), Recommendation of the Council on Transparency and Integrity in Lobbying, 2010.
- Organisation for Economic Co-operation and Development (OECD), Trusted Dialogue on Getting Influence Right, 2021.
- Organisation for Economic Co-operation and Development (OECD) and Principles for Responsible Investment (PRI), Regulating Corporate Political Engagement: Trends, Challenges and the Role for Investors, 2022.

Did the working group consider combining the three Standards as they relate to business conduct?

The Working Group (WG) deliberated combining the three Standards however ultimately decided to keep them separate because the Standards represent specific and distinct impacts that affect stakeholders. Moreover, it was their view that combining the Standards would dilute the richness and comprehensiveness of the reporting requirements.

Why are workers who are not employees considered in the Phase 2 Standards?

Workers who are not employees are included in the GRI draft Standard for Corruption. This is to reflect the full range of stakeholders that may be affected by corruption impacts. The WG also considered it important – specifically from a training and education perspective to include workers who are not employees so that corruption impacts can be avoided or mitigated throughout the organization and all its workers.

GRI-COR: Corruption 202X exposure draft

What are the key changes proposed in the draft Corruption exposure draft?

The key changes in the Corruption exposure draft are as follows:

- A new topic management disclosure on Corruption – COR 1 Prevention of Corruption.
- The definition and examples of corruption has been expanded to include a broader range of activities and impacts that present a more systemic view of corruption.
- Additional focus on ‘operations’ (used in GRI 205-1) to include organizational functions and business partners, and business partner-specific risk disclosure.
- It introduces new elements, such as reporting on ongoing and completed legal actions, and requires the disclosure of legal outcomes such as fines, settlements and internal policy changes.
- Organizations must now report on communication and training on anti-corruption by headcount, distinguishing between employees and workers who are not employees but whose work is controlled by the organization.

GRI-COM: Competition 202X exposure draft

What are the key changes in the Competition exposure draft?

The key changes in the draft Competition Standard are as follows:

- A new topic management disclosure – COM-1 Prevention of anti-competitive behavior.
- The exposure draft expands the definition of anti-competitive behavior to include a broader range of practices beyond traditional behaviors, such as price fixing and market allocation, as well as predatory pricing and the abuse of dominant market power.
- Organizations must report legal actions into two disaggregated categories: ongoing and completed; as well as describe the main outcomes of completed actions, including: legal decisions, settlement agreements, policy changes, or changes in governance.
- A new disclosure on communication and training requires organizations to report quantitative data on how it communicates and builds internal awareness around competition.
- Guidance has been expanded for all disclosure requirements.

GRI-PP: Public Policy 202X exposure draft

What are the key changes proposed in the GRI-PP: Public Policy 202X exposure draft?

The exposure draft, a revision of the GRI 415: Public Policy 2016 Topic Standard, includes both revised disclosures and new disclosures, aligning with the project objectives. These changes include:

New topic management disclosures (PP-1) on an organization's public policy position: Under this disclosure, organizations are expected to report the policy areas that their public policy engagement is focused on and disclose their formal positions on these areas.

New topic management disclosures (PP-2) on public policy alignment: Under this disclosure, organizations are expected to report the processes and measures they use to ensure alignment between their public policy positions, public policy engagement activities, and policies and commitments. This includes alignment across the organization, including between the organization's parent entity and any subordinate entities, and any third parties such as trade and industry associations. This information helps to understand how the organization maintains coherence and consistency in its public policy efforts.

Updated topic disclosure (PP-3) to report on public policy engagement by the organization. This disclosure builds on requirements in the existing GRI 415-1 by expanding the scope and specificity of required reporting on public policy engagement. While GRI 415-1 focused primarily on the total monetary value of financial and in-kind political contributions, PP-3 introduces a more detailed, activity-based approach. Organizations are now required to report public policy engagement activities by policy area (as identified under Disclosure PP-1), and to disclose the public policy actors engaged, locations, and total monetary value of expenditures, including in-kind contributions.

This shift addresses the growing demand from stakeholders for clarity not only on the amount spent, but also on how and with whom organizations engage in public policy. It enhances comparability, supports assessments of alignment with stated policy positions, and increases accountability regarding public policy engagement practices.

Expanded guidance throughout the draft. This includes example templates for presenting the information for Disclosures PP-3.

How does public policy engagement relate to lobbying?

Public policy engagement in the revised GRI-PP: Public Policy 202X refers to the different ways in which an organization seeks to influence public policy outcomes in connection with its actual and potential impacts on the economy, environment, and people. In OECD instruments that focus specifically on lobbying, lobbying is understood as direct or indirect communication with public officials or decision-makers for the purpose of influencing public policy, legislation, or regulation, including when carried out through intermediaries such as trade and industry associations (OECD, 2010; OECD, 2021). At the same time, other OECD instruments address corporate influence on public policy more broadly, recognizing that organizations may affect policy outcomes through additional activities that are

not always captured by legal definitions of lobbying, such as political contributions, participation in advisory or expert bodies, and engagement through third parties (OECD, 2023; OECD–PRI, 2022). Reflecting this approach, GRI 415 uses the broader concept of public policy engagement to enable organizations to report, in an impact-focused manner, on how their public policy positions and engagement activities—whether direct or indirect—are connected to their most significant public policy-related impacts

Why have trade and industry associations been included in the exposure draft?

The exposure draft expands the scope of GRI 415: Public Policy 2016 by more explicitly addressing public policy engagement carried out through trade and industry associations. This change reflects growing international recognition that an organization's most significant public policy-related impacts may arise not only from direct engagement with public officials, but also from indirect engagement through collective or representative bodies. OECD instruments on transparency and integrity in lobbying and responsible business conduct highlight that trade and industry associations are a common channel for policy influence and that positions advanced through such associations can affect public policy outcomes, even when individual member organizations are not directly involved.

OECD and OECD-PRI analysis further emphasizes that misalignment between an organization's publicly stated policies and commitments and the policy positions pursued by trade and industry associations on its behalf can create risks for stakeholders and public policy processes (OECD–PRI, 2022).

By explicitly including trade and industry associations, the exposure draft strengthens impact-focused transparency by enabling organizations to report on how they assess and manage alignment between their own public policy positions and those advanced through associations, including where misalignments may occur. This represents a shift from the current GRI 415 toward greater visibility of indirect public policy engagement and its associated impacts, consistent with evolving international expectations for responsible corporate political engagement.

Public Comment Period

Why do you have a public comment period? What's the purpose of it?

The public comment period is an opportunity to provide feedback on the clarity, completeness, feasibility, and relevance of content in the exposure drafts. Stakeholders are encouraged to submit their feedback through the [public comment survey](#) or by emailing their comments to gssbsecretariat@globalreporting.org.

When is the public comment period? Until when can we provide feedback on the exposure drafts?

The exposure drafts for GRI Corruption, GRI Competition and GRI Public Policy of the GRI Topic Standard Project for Economic Impact, will be available for public comment between 21 January and 31 March 2026.

Should I give feedback as an individual or as an organization?

Feedback can be provided by individuals as well as organizations.

Where can I find the draft exposure drafts?

You can access the exposure drafts using the following links

- [GRI Corruption exposure draft](#)
- [GRI Competition exposure draft](#)
- [GRI Public Policy exposure draft](#)

Where can I find the form to submit my feedback?

You can provide input on the exposure drafts until 31 March via the [public comment survey](#), which is available on our [website](#).

Do I have to give feedback for all the standards? Do I have to answer all the survey questions?

No, you are free to give feedback on standards separately, and you are welcome to skip the questions that you do not find relevant to your feedback.

Can I also provide feedback by email?

We strongly request to provide via the online public comment survey, but in cases where this is not possible, you can provide feedback by email by sending a formal letter to
gssbsecretariat@globalreporting.org

Will my comments on the exposure drafts be made public?

Yes, as required by our Due Process Protocol, all comments will be considered a matter of public record. Comments will be published on the GRI website along with the name of the individual or organization submitting them, the country represented, and the stakeholder constituency. We ask for your consent to publish your name and the name of your organization along with your comments on our website. So, there is an opt-out option for you to choose, in case you wish to not make your personal details public.

How can I access the recordings of the launch public comment period webinars?

Two free global webinars on the exposure drafts took place in January. The slide decks and recordings will be shared to those registered for the sessions

Where can I find more information about the economic impact project?

All relevant information about the revision of the GRI Economic Impact Standards can be found on the project page: [GRI - Topic Standards Project for Economic Impact](#).

How can I keep up-to-date with the developments in the Economic Impact project?

The easiest way is to register for our GRI Newsletter via the [registration link](#) or as an organization become a member of the [GRI Community](#).

What is the Due Process Protocol?

GRI Standards are developed according to a formally defined Due Process Protocol, which is overseen by the Due Process Oversight Committee (DPOC). The GRI Sustainability Reporting Standards are built on a foundation of more than 25 years of robust global multi-stakeholder development. The Due Process Protocol ensures that the Standards are developed following a transparent and robust process, that they continue to promote the public interest, and are aligned with GRI's vision and mission.

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Using GRI standards

GRI Standards and how my organization can use them in different country contexts?

Welcome to GRI! We're so happy you are here. For over 25 years, GRI has been a leader in global sustainability impact reporting.

The GRI Standards enable any organization – large or small, private or public – to understand and report on its impacts on the economy, environment, and people in a comparable and credible manner, thereby increasing transparency on its contribution to sustainable development. In addition to companies, the Standards are highly relevant to many stakeholders, including investors, policymakers, capital markets, and civil society.

The Standards are designed as an easy-to-use modular set, delivering an inclusive picture of an organization's material topics, their related impacts, and how they are managed.

Therefore, the GRI Standards can be applied to any country and sector context.

You can find more information about the GRI Standards and resources for how to report on the GRI website.

I have questions about the GRI Universal Standards; where can I find information about it?

You can find more information here on the GRI website. Additionally we have these resources:

- Public FAQs on the Universal Standards:
<https://www.globalreporting.org/media/zauil2g3/public-faqs-universal-standards.pdf>
- How to use the standards: <https://www.globalreporting.org/how-to-use-the-gri-standards/questions-and-answers/>

What resources are available to support organizations in their reporting efforts?

GRI can help companies improve their sustainability reporting, meet stakeholder transparency expectations, foresee and act on risks and opportunities, and make more informed strategic decisions. Our services, membership program, and online learning portal provide the essential expertise to help you achieve accurate and high-quality sustainability reporting. Plus, through our partnerships with training and software providers, we can direct you to further support resources, certified by GRI.

Take your sustainability reporting to the next level with our full range of support options for applying the GRI Standards – the most widely used set of sustainability reporting standards in the world.

GRI has Sector Standards intended to increase the quality, completeness, and consistency of reporting by organizations. Standards will be developed for 40 sectors, starting with those with the highest impact, such as oil and gas, agriculture, aquaculture, and fishing.

The Standards list topics that are likely to be material for most organizations in a given sector and indicate relevant disclosures to report on these topics. If an applicable Sector Standard is available, an organization is obliged ('required') to use it when reporting with the GRI Standards.

For more information, here are additional FAQs about the Standards GRI - Questions and answers (globalreporting.org)

Are there best practices GRI can share for verifying or auditing these disclosures?

While not required, the GRI Standards recommend that an organization seek external assurance for its sustainability reporting, in addition to using internal controls.

Section 5.2 of *GRI 1: Foundation 2021* describes various ways an organization can enhance the credibility of its sustainability reporting, including through external assurance, internal controls, and stakeholder or expert panels.

What should an organization do if it does not have all the data required to comply with a disclosure?

An organization can use reasons for omission if it cannot comply with a disclosure or with a requirement in a disclosure for which reasons for omission are permitted.

Reasons for omission are permitted for all disclosures from the GRI Standards except for five disclosures from GRI 2: General Disclosures 2021 and two disclosures from GRI 3: Material Topics 2021.

There are four reasons for omission that an organization is permitted to use:

- Not applicable
- Legal prohibitions
- Confidentiality constraints
- Information unavailable/incomplete

An organization still reports in accordance with the GRI Standards as long as it complies with the requirements for the reasons for omission specified in Requirement 6 in *GRI 1: Foundation 2021*. See Requirement 6 in section 3 of GRI 1 for more information on applying the reasons for omission.

How do I use GRI Topic Standards?

An organization reporting in accordance with the GRI Standards is required to report the following disclosures if it has determined monetary flows to be a material topic:

Disclosure 3-3 Management of material topics in *GRI 3: Material Topics 2021*. Any disclosures from the topic standard that are relevant to the organization's most significant impact. See Requirements 4 and 5 in *GRI 1: Foundation 2021*. Reasons for omission are permitted for these disclosures.

Is there a minimum number of disclosures required to report in accordance with the GRI Standards?

No. There is no requirement to report a minimum number of disclosures to report in accordance with the GRI Standards. The number of disclosures that an organization reports is based on its assessment of which disclosures are relevant to its impacts in relation to a material topic.

An organization needs to identify the disclosures from its material topics to report. An organization is required to report only those disclosures relevant to its impacts in relation to its most significant impacts. An organization is not required to report disclosures that are not relevant.

See Requirement 5 in *GRI 1: Foundation 2021*.

Are GRI Standards available in other languages?

The authoritative text of the GRI Standards is English. Authorized translations of GRI Standards in key languages are made available following formal publication. Please consult the [GRI Translations](#) page

or contact translations@globalreporting.org for more information on the upcoming translation Schedule.