Transition to GRI Standards

Item 05 – Summary of key changes to the exposure drafts

For GSSB information

<table>
<thead>
<tr>
<th>Date</th>
<th>22 March 2016</th>
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<tbody>
<tr>
<td>Meeting</td>
<td>5-7 April 2016</td>
</tr>
<tr>
<td>Project</td>
<td>Transition to GRI Standards</td>
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<tr>
<td>Description</td>
<td>As part of the move to become a standard setter, the Global Sustainability Standards Board (GSSB) has decided that the G4 Guidelines need to be transitioned to GRI Sustainability Reporting Standards. This paper presents a high-level summary of the most recent changes made in the six ‘Group 1’ standards which will be exposed for public comment beginning on 19 April. These drafts include SRS 101: Foundation, SRS 201: General disclosures, SRS 301: Management approach, SRS 403: Indirect economic impacts, SRS 505: Emissions, and SRS 615: Public policy.</td>
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About this paper

This paper presents a summary of the most recent changes made in the six ‘Group 1’ standards which will be exposed for public comment beginning on 19 April 2016. These drafts include:

- SRS 101: Foundation (Item 07)
- SRS 201: General disclosures (Item 08)
- SRS 301: Management approach (Item 09)
- SRS 403: Indirect economic impacts (Item 10)
- SRS 505: Emissions (Item 11)
- SRS 615: Public policy (Item 12)

In addition, the GRI Standards Glossary of terms for the ‘Group I’ Standards is presented for the GSSB review (Item 13).

This paper highlights only the significant changes that have been made in each draft since the latest GSSB discussion on that topic. Earlier changes that were previously communicated to the GSSB, or discussed in conference calls, have not been included in this paper. These changes are, however, indicated throughout the documents within comment boxes, and summarized at the end of each document.

These draft Standards also incorporate changes related to the employee/worker terminology revision project. These changes are recorded in the summaries at the end of each draft. More background on these changes can be found in Item 06 – List of suggested revisions for ‘employee’, ‘worker’ terminology for first set of public exposure drafts.

Annex 1 provides an overview of the project objectives, revision principles and content clarifications.

GSSB feedback requested

The Standards Division has identified three specific areas for further GSSB discussion at the in-person meeting on 5th April 2016:

1. New introduction text added to the Foundation standard (Background on sustainability reporting). See Item 07 lines 18-39.

2. Additional text added to the definition of topic Boundary to help clarify the context around defining Boundaries outside the organization. See Item 07 lines 560-565.


For these areas, GSSB members are asked to please raise any significant comments or concerns ahead of the meeting.

Any other feedback:

Following the project timelines, the Standards Division will have just over a week between the close of the GSSB meeting and the opening of the consultation period. Therefore, the GSSB is requested to please raise ahead of the meeting any other critical issues or substantive concerns related to the draft GRI Standards. This includes any points that GSSB members feel must be addressed before the documents can be approved as public exposure drafts.
Summary of significant changes

Overarching changes to the template/structure

a) New subsections have been included, as per the follow-up to GSSB meeting on 3 March 2016. There are now three ‘categories’ of text in the Standards:

- **Reporting requirements** – these sections include all ‘shall’ statements, both disclosures and methodology
- **Reporting recommendations** – these include all ‘should’ statements
- **Guidance** – background context, examples, and ‘can’ statements

This new structure aims to make it clear to reporters exactly which content is required and which content is recommended.

b) The wording around the ‘Effective date’ (in the Introduction sections) has been adjusted to clarify that earlier adoption of the Standards is encouraged.

c) The wording around ‘Normative references’ (in the Introduction sections) has been revised to be clearer and aligned with ISO guidance on standard setting.

SRS 101: Foundation

Based on feedback from the latest GSSB call on 3 March, the following changes have been made:

a) An additional introduction section on sustainability reporting is now included. This was drafted by Bastian Buck, Standards Director, and has been discussed with selected reporters and other stakeholders. This text is intended to be a high-level overview on sustainability reporting. A ‘foreword’ for the GRI Standards can be prepared later in the process and will be discussed separately with the GSSB. See Item 07, lines 18-39.

b) The Reporting Principles section has been moved up front, so this is now the first section of the Standard (after the Introduction content). See Item 07, line 127.

c) Additional clarification text has been added to the explanation of topic Boundary, based on comments during the GSSB call and received afterwards. The explanation now includes selected text from the UN Guiding Principles to better describe the concept of Boundaries outside the organization. See Item 07, lines 560-565.

d) Minor changes have been made in the ‘General reporting process’ section based on comments from GSSB members after the 3 March call. There is now one ‘shall’ statement related to aggregating information at the appropriate level, and the remaining clauses in the section are all ‘should’ statements (recommendations). See Item 07, lines 607-615.

e) Guidance in the ‘claims’ section has been revised and now emphasizes that organizations should only use and reference the GRI Standards in line with these three specific claim options. See Item 07, lines 675-679.
f) The ‘in accordance’ section now makes it explicit that organizations need to comply with all relevant reporting requirements (i.e., ‘shall’ methodology as well as disclosures) in order to use an ‘in accordance’ claim. See Item 07, Table 2 (line 724) and lines 719-722.

g) Additional guidance text is now included on how to select one disclosure for each material topic, for organizations using the ‘in accordance’ core option. This is based on text previously approved by the GSSB for the G4 FAQ. See Item 07, lines 730-732.

h) Revised guidance text is included around ‘SRS-referenced’ claims to make this concept clearer, and with an example claim statement now provided in guidance. See Item 07, lines 746-753.

SRS 201: General disclosures

Based on feedback from the latest GSSB call on 25 February, the following changes have been made:

a) Disclosure 201-2 (primary brands, products and services…) has been revised to include ‘core activities’ and also to include content from the previous Indicator G4-PR6 (banned products and services…). The relocation of Indicator G4-PR6 was discussed with the GSSB in December 2015. See Item 08, line 91.

Note: One GSSB member strongly recommends retaining Indicator G4-PR6 within the Marketing communications Standard.

b) Disclosure 201-9 (description of the reporting organization’s supply chain) has been revised and expanded to include text that was previously in the methodology section. The disclosure now reads: A description of the reporting organization’s supply chain, including its main elements as they relate to the organization’s core activities, as well as its primary brands, products, and services. See Item 08, line 145.

c) General Disclosure 201-13 (memberships of industry associations…) has been updated to require only main memberships to be reported. With this change in the disclosure text, the methodology has also been updated from a ‘shall’ statement to a ‘should’ statement (as per GSSB input). See Item 08, line 191.

d) The Strategy and Analysis section has been revised based on GSSB comments and internal Standards Division discussions. These disclosures were very lengthy and the majority of content served, in effect, as recommendations about how the disclosures should be reported. Therefore, the majority of content has been moved out of disclosures 201-14 and 201-15 and has been kept as recommended methodology. This will make the disclosures more consistent with the new format and template of the Standards. The section has also been moved farther upfront in the Standard, and it now sits directly after Organizational Profile section. See Item 08, lines 200-274.

e) The Guidance of General Disclosure 201-22 (collective bargaining agreements) has been updated to clarify the intent of this disclosure. See Item 08, lines 353-362.

f) The Methodology section around Disclosure 201-46 (defining the report content and topic Boundaries, and an explanation of how the reporting principles have been applied) has been revised to be more clear and logical. See Item 08, lines 576-585.
g) The content index section has been further revised to be less prescriptive and specific – the section now includes more minimal requirements about the content that needs to be included in a content index, and gives one example table in guidance. The methodology related to the content index has also now been revised to be a ‘should’ statement (recommendation). See Item 08, lines 670-719.

**Further work pending:**

Please note that the content in 201-8 (formerly G4-10) is still under review by the Employee/worker Technical Committee, which has not yet reached agreement on revisions for this disclosure. The Technical Committee will continue reviewing this content with the aim of presenting suggested revisions for GSSB discussion at the April meeting.

**SRS 301: Management approach**

The GSSB made a number of recommendations on the Management approach Standard during the 11 March 2016 meeting. For more background, please consult the meeting summary and/or recording.

The Standards Division implemented these recommendations in an interim version of this Standard. However, when all these changes were made together, the final outcome appeared significantly more complicated than the simple and concise DMA section in G4. Therefore, to reduce the perception of major content changes, and to keep the Management approach requirements clear, the Standards Division has slightly revised the draft Standard. The following changes have been made:

a) The disclosures are now structured into three sections: ‘Why and where the topic is material’; ‘The management approach and its components’; and ‘Evaluation of the management approach’. The Division hopes this grouping will help preserve the clear and concise structure of the original G4 management approach disclosures and encourage a better articulation of the management approach.

b) The disclosure requirements for Boundary have been updated to reflect the revised definition, which was discussed in the GSSB meeting on 25 February 2016. See Item 09, Disclosure 301-1-b and c, and lines 107-127.

c) The recommendation (‘should’) to ‘describe whether the management approach is intended to avoid, mitigate, or remediate negative impacts, or enhance positive impacts’ has been reworded as a reporting requirement (‘shall’), as follows: ‘A statement of the management approach purpose’. See Item 09, Disclosure 301-2-b.

d) For the grievance mechanisms content, the Standards Division has:

i) consolidated all content within just one section of this Standard;

• removed the term ‘formal’ in ‘formal grievance mechanisms’. The disclosure now requests information on any grievance mechanism, whether an operational-level mechanism, or a collaborative mechanism established by, or formally involving, other organizations;
Moved the requirement to report quantitatively on the number of grievances (previously Indicators G4-EN34, G4-LA16, G4-HR12, and G4-SO11) to the Guidance section; and see Item 09, lines 196-205.

• added Guidance on describing the purpose and quality of the grievance mechanisms, in line with the UN Guiding Principles on Business and Human Rights. See Item 09, lines 161-195.

e) Relevant content from the ‘Overall’ and ‘Investment’ Aspects has been added as Guidance:

Background: The Standards Division had previously proposed to discontinue the Aspects ‘Overall’ (Environmental Category) and ‘Investment’ (Human Rights sub-Category), meaning these Aspects would not be developed as individual Standards. The content of these Aspects had been proposed to be transitioned as Guidance, where relevant.

Relevant content from the ‘Overall’ Aspect has been transitioned into this Standard as guidance. See Item 09, lines 218-221. Additional relevant content from the ‘Overall’ Aspect will be transitioned into other Standards, namely: ‘Emissions’ (see next section), ‘Effluents and waste’ and ‘Compliance’ (the last two to be developed in the next stage of the project).

Relevant content from the ‘Investment’ Aspect has been transitioned into this Standard as guidance. See Item 09, lines 213-214.

Note: One GSSB member strongly recommends retaining the Aspect of ‘Investment’ and related Indicator G4-HR1, with additional clarification.

The following are previously recommended changes that have not been implemented in the latest version of this Standard due to the concerns outlined earlier:

f) Requiring a description of the process to identify impacts:

The GSSB had recommended making the following statement a required disclosure: ‘describe any processes [the organization] used to identify its impacts, such as due diligence’. This has been preserved as Guidance within the latest version of this Standard, for the reasons outlined at the beginning of this section.

g) Requiring a description of certain characteristics of the grievance mechanisms (e.g., purpose, intended users, effectiveness):

The GSSB had recommended replacing the quantitative measure about grievances with a narrative requirement for describing the grievance mechanisms’ purpose and quality. The latest version of this Standard does include a requirement to describe grievance mechanisms where they exist for a material topic (See Item 09, Disclosure 301-2-c-iii). However, the more detailed description of the purpose and quality of the mechanism has been developed as Guidance (See Item 09, lines 161-195), also for the reasons outlined at the beginning of this section.

h) Changing the status of G4 Guidance (from ‘can’ to ‘should’):

GSSB feedback on the previous iteration of this Standard recommended elevating some of the original G4 Guidance on specific components of the management approach (i.e., policies, commitments, goals and targets, resources, responsibilities and specific actions) into a reporting recommendation (‘should’). The GSSB highlighted the guidance for ‘resources’ and ‘responsibilities’ in particular as worth elevating into a recommendation. The GSSB was then...
asked to consider the same for the other components. To support some of this decision-making, the Standards Division offered to conduct research on the extent to which this guidance gets reported on. The outcomes of this research can be found in Annex 2.

SRS 403: Indirect economic impacts

a) The ‘Background context’ section has been updated following GSSB feedback. In particular, mentions of risks to the organization (such as reputation) have been removed; and wording around risks of adverse impacts happening with regards to this topic has been improved. See Item 10, lines 76-91.

b) The G4 management approach guidance has been elevated into a reporting recommendation (‘should’). See Item 10, lines 105-111.

c) Content from the introductory text to the Economic Category of G4 has been added to this Standard as guidance. This text asks organizations to compile data for economic disclosures using relevant international financial reporting standards. This guidance is currently proposed to be included in each Economic Standard. See Item 10, lines 113-120.

SRS 505: Emissions

a) Updated methodology for Scope 2 Emissions: Disclosure 505-2 has been updated to align with changes to the GHG Protocol Scope 2 Guidance, published in January 2015 by World Resources Institute (WRI) and World Business Council for Sustainable Development (WBCSD). The updated Scope 2 Guidance asks organizations to provide two distinct Scope 2 values: a location-based and a market-based value. These are calculated with different emissions factors that vary according to how the organization obtained the energy associated with those emissions. The Standards Division is in contact with WRI to ensure the changes are fully in line with the updated Scope 2 Guidance. This change has been indicated in this draft Standard as a ‘content update’ change and will be explained in the summary of changes at the back of the document. See Item 11, Disclosure 505-2-a and b, and lines 245-248, 257-263, and 265-270.

b) Previous G4 management approach guidance on GHG emissions targets and offsets has been elevated into a reporting recommendation (‘should’). See Item 11, lines 154-156.

c) Relevant content from the ‘Overall’ Aspects has been added as Guidance:

Background: The Standards Division had previously proposed to discontinue the Aspect ‘Overall’ (Environmental Category), meaning that the Aspect would not be developed as an individual Standard. The content of this Aspect had been proposed to be transitioned as Guidance, where relevant.

Relevant content from the ‘Overall’ Aspect has been transitioned into this Standard as guidance. See Item 11, lines 161-162.

Additional relevant content from the ‘Overall’ Aspect will be transitioned into other Standards, namely: Management approach (see earlier section), ‘Effluents and waste’ and ‘Compliance’ (the last two to be developed in the next stage of the project).
a) The 'Background context' section has been updated following GSSB feedback. In particular, mentions of risks to the organization (such as reputation) have been removed; and wording around risks of adverse impacts happening with regards to this topic has been improved. See Item 12, lines 76-86.

b) The G4 management approach guidance has been elevated into a reporting recommendation ('should'). See Item 12, lines 100-104.

Glossary of terms (for the 'Group I' Standards)

For an overview of changes to definitions of terms, see Item 13 – Exposure draft of the GRI Standards Glossary: Group I terms and key terms.

The final designed versions of the GRI Standards will indicate which of the terms used are defined in the Glossary.
Annex 1. Project objectives, revision principles, and content clarifications

This Annex summarizes the key objectives pursued and content revision principles applied in the transition of the G4 Guidelines to GRI Standards. It also includes a table explaining the content clarification issues that have been incorporated throughout the draft GRI Standards. For more background on the Transition to GRI Standards, visit the GSSB webpages:

https://www.globalreporting.org/information/about-gri/governance-bodies/Global-Sustainability-Standard-Board/Pages/default.aspx

The following objectives have been pursued during the transition to GRI Standards:

- Designing a format that allows the GRI Standards to be updated independently when the need arises and that facilitates continuous improvement
- Preserving the Reporting Principles and the focus on materiality
- Improving the overall user-friendliness and technical quality and robustness of the GRI Standards
- Ensuring minimal changes to the G4 disclosure requirements and their methodologies
- Allowing for flexibility in reporting options and formats

Revision principles

The following principles have been applied to the G4 Guidelines’ content in the transition to GRI Standards:

- Relocating G4 content – to make it easier to find and improve its usability
- Reviewing the use of instructive verbs within G4 guidance – to clarify the intent of guidance text that comes from the G4 Implementation Manual
- Clarifying G4 content, to improve clarity and ensure the correct understanding and use of the GRI Standards
- Eliminating unnecessary duplication of content – to reduce complexity and volume
- Removing unnecessary guidance – which is deemed of little value or unnecessary for correctly applying the GRI Standards, thus shortening the text and helping users focus on relevant information
- Updating text – to reflect the new format, structure and terminology of the GRI Standards
**Content clarification issues addressed in the GRI Standards**

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<th>Issue Name</th>
<th>Summary of content clarification issue and proposed changes</th>
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| Issue A1: Clarifying the use of the term ‘impacts’ | • The term ‘impacts’ has been clarified throughout the GRI Standards to help users understand that, in the context of these standards, the term relates to impacts on the economy, the environment, or society (not to impacts on the organization itself). Examples have been provided in guidance where appropriate.  
• This is to address previous confusion in which some users of G4 interpreted the term ‘impacts’ as impacts on the organization itself (e.g. reduced profits)  
• In specific cases where text refers to impacts on the organization, the term ‘impacts’ has been replaced with other suitable words depending on the context (e.g. effects on the organization, or consequences for the organization) to improve clarity |
| Issue A2: Relating other topics to GRI Standards | • The GRI Standards now clarify that reporting organizations should relate their material topics to the existing list of topics in the GRI Standards where possible. This is clarification has been proposed due to confusion from G4 users about how to report on topics that are similar to, but not identical to, the topics (Aspects) covered in G4.  
• Within the Foundation standard, it is now explained that topic descriptions within the GRI Standards are intentionally broad and are designed to encompass numerous other related or more specific subjects. For example, if an organization identifies ‘Water conservation’ as a material topic, this should be related to the broader GRI topic on ‘Water’. The organization should use disclosures from the ‘Water’ Standard where possible, or if not relevant they can use reasons for omission or include other more appropriate disclosures. |
| A3: Clarifying topic descriptions | • Revised descriptions of each topic (Aspect) will be included in each topic-specific Standard. This should make it easier for reporting organizations to understand the nature of each topic and which related topics could be grouped together under the same standard for the purposes of reporting. |
| Issue A4: Reporting on other material topics | • The GRI Standards now clarify that the report should include all material topics listed under 201-47 (formerly G4-19, the list of material topics), even if they are not covered by a topic-specific GRI Standard.  
• This clarification addresses questions from G4 reporters who were not clear on how to include material topics that didn’t have a corresponding Aspect (topic) within the G4 Guidelines.  
• SRS 101: Foundation now explains that if a material topic is not covered by an existing topic-specific Standard (and cannot reasonably be linked to an existing Standard), the reporting organization is expected to use SRS 301: Management Approach to report on its management approach. It can also use other disclosures, although it is recommended that these disclosures are subject to the same technical rigor as disclosures in the GRI Standards, and can come from other established standards or reporting frameworks where possible. |
| Issue A5: Reporting the process for defining report content | • Additional guidance text has been added into the Foundation standard (section 2) and SRS 201: General disclosures to clarify the expectations for organizations reporting disclosure 201-46 (formerly G4-18)  
• An additional ‘How-to-guide’ will be developed based on the previous G4-18 guidance text from the G4 Implementation manual. This will be made available to reporters as a non-mandatory reference that can be used along with the GRI Standards |
<p>| Issue A6: Clarifying the | • Text in the GRI Standards has been clarified to help reporting organizations understand the concept of topic Boundaries, especially when Boundaries are |</p>
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| definition of Boundary | defined as outside the organization. This clarification is due to common misinterpretations of the Boundary concept amongst G4 reporters.  
* The revised description of a topic Boundary is now included in SRS 101: Foundation, SRS 301: Management approach, and the GRI Standards Glossary of terms. This revised description is as follows:  
* The concept of the topic Boundary refers to the entities that cause the impacts related to a material topic. These entities can be within the organization (i.e., the entities included in the organization’s consolidated financial statements or equivalent documents, as reported under Disclosure 201-45 of SRS 201: General disclosures), outside of the organization (e.g., suppliers or clients), or both.  
The Boundary of a material topic is defined as within the organization if the organization or an entity it owns or controls (e.g., subsidiary) has caused a significant impact on the economy, the environment or society.  
The Boundary of a material topic is defined as outside of the organization if an outside entity (e.g., supplier, client) has caused a significant impact on the economy, the environment or society that the reporting organization has either contributed to, or is linked to, via a business relationship.  
The concept of defining topic Boundaries outside of the organization is due to the fact that organizations are increasingly expected to take responsibility for impacts where:  
  o the organization has contributed to, or is seen as contributing to, an impact through its activities or decisions, but this impact has been caused directly by another party; and  
  o the organization is involved solely because the impact is directly linked to its operations, products or services by a business relationship (even if it has not contributed to that impact). |
| Issue A7: Reporting impacts outside the organization | • The GRI Standards now clarify the expectations for how organizations should report on a topic if the Boundary is outside their own organization (e.g. the impacts occur in the supply chain, which means it is not always possible to obtain information needed to report on the disclosures). This clarification was due to previous confusion  
• If the Boundary for a topic extends beyond the organization, the reporting organization is still expected to include this material topic in the sustainability report. To make an in accordance claim, the organization is required to report on its management approach using SRS 301: Management approach. If the topic-specific disclosures cannot be reported due to insufficient information, the reporting organization can use reasons for omission. |
| A8: Expectations for reporting on the supply chain | • The text for disclosure 201-9 (formerly G4-12) has been expanded to be more specific on the reporting expectations. This clarification was due to inconsistent reporting and questions from G4 users about how to report this disclosure.  
• The original wording for the disclosure was: Describe the main elements of the supply chain in relation to the organization’s primary activities, products, and services.  
• The revised disclosure now specifies that the organization shall report: ‘a description of the reporting organization’s supply chain, including its main elements as they relate to the reporting organization’s core activities, as well as its primary brands, products, and services.’ |
| Issue A9: Clarifying use of GRI Sector Disclosures | • To improve clarity about how the GRI sector guidance is to be used, a new section of guidance has been included in SRS 101: Foundation. This text explains that GRI sector guidance can be consulted, where available, to help organizations identify their material topics. |
### Issue Name

**Issue A11: Clarifying the ‘in accordance’ criteria**

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<td>• The GRI Standards still have two options (core and comprehensive) for users that wish to prepare a report in accordance with the GRI Standards and make a public claim (statement) to that effect.</td>
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<td>• However, it has been clarified in the new structure of the standards that in order to use an ‘in accordance’ claim, the organization is required to not only report the relevant disclosures, but also to comply with all related reporting requirements (‘shall’ statements). This includes the process requirements in the Foundation standard, which require, for example, that all Reporting Principles are applied. A revised table (Table 2) has been incorporated into SRS 101: Foundation with the minimum criteria to make each in accordance claim.</td>
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<td>• A third claim option (SRS-referenced) exists for organizations that use the GRI Standards but are not preparing an in accordance report. This is based on the concept of a ‘GRI-referenced’ report in G4, but the concept and requirements have been made more clear in the transition to GRI Standards. The aim is to have better transparency about how the GRI Standards are used in practice, while allowing flexibility for reporters to individual standards or their contents for reporting specific sustainability information.</td>
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<td>• Further clarification has also been included in the Foundation standard about using reasons for omission, including revised explanations about how and when these reasons can be used.</td>
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Annex 2. Management approach research

The Standards Division analyzed a sample of management approach disclosures for 60 Aspects (with an equal mix of economic, environmental and social topics) across 20 G4-based reports (with a mix of regions, sizes and sectors) to find out whether these components are typically reported for each material topic. The Division then did a more in depth review of the reported information for those components found to be more frequently reported, to assess how much of the detailed G4 guidance was actually followed. The ultimate aim was to find out whether elevating some of this guidance would be raising the bar for reporters – also given the concern that the G4 Implementation Manual is not as widely consulted.

Through this research, the Standards Division found the following:

- The more commonly reported components were found to be: policies (97%), commitments (97%), and specific actions (87%). Whilst the amount of information provided varied for each topic, nearly all management approach disclosures for the 60 Aspects consulted included some reference to or information for these three components. It should be noted that a certain degree of interpretation went into deciding whether the information belonged to one of these categories. This is due to the fact that organizations used different terminology and structured the information differently than G4.

- The other components were reported as follows: responsibilities (73%), goals and targets (65%), and resources (58%).

- For specific actions, commitments and policies, the Division found that the G4 guidance available for those components was largely followed by reporters.

Despite limitations around the size of the sample and the degree of subjectivity involved in such analysis, it could be concluded that specific actions, commitments and policies are generally very well reported, and thus could be elevated into a recommendation. Elevating the other components might be raising the bar for some reporters. However, because of the reasons outlined earlier in the paper, the Standards Division would recommend preserving this content as Guidance for the time being. In addition, it could also be concluded that all these components are generally well reported, despite them not being required in G4.