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GRI Universal Standards public comment

Explanatory memorandum for the exposure draft

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14 Introduction

15 The Global Sustainability Standards Board (GSSB), the independent standard setting body of GRI, has
16 published an exposure draft of the [Universal Standards for public comment](#) between 11 June and 9
17 September 2020.

18 This explanatory memorandum sets out the objectives for the review of GRI's Universal Standards
19 (*GRI 101: Foundation 2016*, *GRI 102: General Disclosures 2016* and *GRI 103: Management Approach*
20 *2016*). It also covers the significant proposals contained in the Universal Standards exposure draft,
21 and a summary of the GSSB's involvement and views on the development of the draft.

22 Objectives for the review of the Universal 23 Standards

24 The primary objective in reviewing the Universal Standards is to address the recommendations from
25 the GRI Technical Committee on Human Rights Disclosure. Feedback received from the GSSB
26 during the transition from the GRI G4 Guidelines to the GRI Standards and from reporting
27 organizations and other stakeholders, as well as information gathered through reviews of
28 sustainability reports using the GRI Standards, have provided further areas of the Universal
29 Standards to be addressed.

30 Overall, the project aims to:

- 31 • provide greater clarity on key concepts, reporting principles and disclosures in the Universal
32 Standards and ensure they are aligned with recent developments in the area of responsible
33 business conduct;
- 34 • integrate the expectation of due diligence into the GRI Standards;
- 35 • assist reporting organizations in understanding the reporting requirements and how they
36 demonstrate compliance in a transparent way;
- 37 • drive consistent application of the GRI Standards;
- 38 • encourage more relevant and comprehensive reporting for experienced reporting
39 organizations;
- 40 • enable first time reporters and SMEs to more easily apply the GRI Standards;
- 41 • improve overall usability of the GRI Standards.

42 The content of the Universal Standards has been revised in line with these project objectives. A sub-
43 committee of four GSSB members was convened to provide overall advice and direction for this
44 project. The content and proposed revisions presented in the exposure draft have been discussed
45 with all members of the GSSB over the course of several meetings in 2019 and 2020.

46 The review of the Universal Standards has been informed by the recommendations of the [GRI](#)
47 [Technical Committee on Human Rights Disclosure](#), a stakeholder group on labor-related
48 disclosures, a public stakeholder survey that attracted over 240 responses, targeted preliminary
49 consultations with experts and stakeholders, and various research activities.

50 The project to review the Universal Standards follows the [GSSB Due Process Protocol](#). For more
51 information, consult the [project proposal](#).
52 Significant changes in the Universal Standards exposure draft are summarized in the next sections. A
53 detailed mapping of changes is available on the [GRI Standards website](#).

54 Significant changes to the Universal 55 Standards structure

56 The content of the Universal Standards has been re-structured for clarity:

- 57 • The first Standard (GRI 101: Using the GRI Standards) introduces the system of GRI
58 Standards and explains how they are to be used.
- 59 • The second Standard (GRI 102: About the Organization) contains disclosures for contextual
60 information about the organization.
- 61 • The third Standard (GRI 103: Material Topics) includes guidance for identifying material
62 topics, and contains disclosures about the organization's material topics and related impacts,
63 how it identifies its material topics, and how it manages each material topic.

64 The new structure aims to clarify the elements of the GRI Standards and their use, and to group
65 contents in a more coherent way. Presenting all content related to material topics in one Standard
66 gives this concept greater visibility.

67 As explained in the following three sections, certain content has been relocated from one Standard
68 to another. The proposed relocation of content between the existing Universal Standards and the
69 exposure draft is visually represented in Appendix I.

70 The disclosure codes used in the exposure draft (e.g., REP-I, ACT-I, GOV-I, RBC-I, SE-I, MT-I)
71 are not the final disclosure codes. They are intended for the purpose of the public comment, to help
72 users distinguish these disclosures from the existing disclosures in *GRI 102* and *GRI 103*.

73 Significant proposals and changes to GRI 74 101

75 Section I. Introduction

76 The Introduction has been updated to reflect the changes to the structure of the Universal
77 Standards outlined in the previous section, as well as the following changes that apply to the entire
78 system of GRI Standards:

- 79 • The **Sector Standards** have been added to the system of GRI Standards. [GRI Sector](#)
80 [Program information sheet](#) helps reviewers understand references to the GRI Sector
81 Standards included in the exposure draft of the Universal Standards. It is expected that the
82 Sector Standard for oil and gas will be released for public comment in July 2020, subject to
83 GSSB approval.

- 84 • The **Topic Standards** are now grouped together under one series instead of the separate
85 economic, environmental, and social series.
- 86 • Reporting **recommendations** ('should' statements) have been incorporated into the
87 guidance sections, in order to simplify the structure of the GRI Standards.

88 Section 2. Key concepts in the GRI Standards

89 This **new section** explains key concepts that are used throughout the GRI Standards and are critical
90 to understanding how to prepare and report information with the Standards. The section covers the
91 following concepts: impact, material topic, due diligence, and stakeholder.

92 Impact

93 This section re-emphasizes the fact that the GRI Standards focus on an organization's **impacts**
94 **outward**: on the economy, environment, and people, including impacts on human rights. These
95 impacts indicate an organization's contribution, negative or positive, to sustainable development.

96 The phrase 'economic, environmental, and social impacts' has been replaced with 'impacts on the
97 economy, environment, and people, including impacts on human rights' to more accurately reflect
98 the different dimensions of sustainable development and to reinforce the approach to reporting
99 impacts outwards.

100 Material topic

101 The **definition of 'material topic' has been revised to focus on impact**. In the exposure
102 draft, a material topic is defined as a 'topic that reflects the organization's most significant impacts on
103 the economy, environment, and people, including impacts on human rights'. Engagement with
104 relevant stakeholders forms part of identifying an organization's impacts, and so informs the process
105 of identifying material topics. However, 'influence on the assessments and decisions of stakeholders'
106 is no longer a standalone factor that determines whether a topic is material.

107 Stakeholder feedback indicates that separating impact assessment from the identification of
108 stakeholder views leaves materiality assessments particularly vulnerable to biases based on
109 stakeholder selection, given that this approach leads organizations to prioritize impacts only if the
110 consulted stakeholders highlight them. Therefore, this revision also addresses the issues associated
111 with the application of the materiality matrix that is provided in the guidance to the Materiality
112 principle in the existing *GRI 101*, where only topics that rank high on both dimensions are prioritized
113 in practice.

114 Due diligence

115 Relevant disclosures in the GRI 102 and GRI 103 exposure draft, as well as the guidance on
116 identifying material topics in the GRI 103 exposure draft, have been **more closely aligned with**
117 **the expectation of due diligence** elaborated in key instruments such as the United Nations (UN)
118 *Guiding Principles on Business and Human Rights*, the Organisation for Economic Co-operation and
119 Development (OECD) *OECD Guidelines for Multinational Enterprises*, and the *OECD Due Diligence*
120 *Guidance for Responsible Business Conduct*. This section explains the concept of due diligence.

121 Stakeholder

122 The **definition of 'stakeholder' has been aligned with the OECD Due Diligence Guidance for**
123 *Responsible Business Conduct*. In the exposure draft, a stakeholder is defined as an 'individual or group
124 that has an interest that is, or could be, affected by the organization's activities and decisions'.

125 The revised definition does not include the second part of the previous definition ('entity or
126 individual whose actions can reasonably be expected to affect the ability of the organization to
127 successfully implement its strategies and achieve its objectives'). This change has been made to be

128 consistent with the GRI Standards' focus on an organization's most significant impacts outwards: on
129 the economy, environment, and people, including impacts on human rights.

130 Section 3. Sustainability reporting using the GRI Standards

131 Changes have been made to the two approaches for using the GRI Standards:

- 132 • Reporting in accordance with the GRI Standards.
- 133 • Reporting with reference to the GRI Standards.

134 The changes are intended to improve the quality and consistency of reporting and increase
135 transparency in the way that the GRI Standards are used.

136 Approach A: Reporting in accordance with the GRI Standards

137 There is **now only one option to report in accordance with the GRI Standards.** (The
138 previous 'Core' and 'Comprehensive' options are being removed.) This makes the way the GRI
139 Standards are used commensurate with other corporate reporting frameworks, which clearly
140 indicate the requirements for being compliant. It also immediately signals to information users the
141 type and extent of reported information they can expect to find, and the basis upon which it has
142 been prepared.

143 When reporting in accordance with the GRI Standards, key changes have been made to the
144 requirements. An organization will now be required to:

- 145 • report all the disclosures in the GRI 102 and GRI 103 exposure draft (with no omissions
146 permitted);
- 147 • use the GRI Sector Standard(s) that apply to its sector(s), where available, when identifying
148 its material topics;
- 149 • report appropriate disclosures from the GRI Topic Standards. Appropriate disclosures are
150 those that adequately capture the impacts related to the organization's material topics. An
151 organization will now be required to report the appropriate disclosures from a Topic
152 Standard, but not those disclosures that do not capture the organization's impacts. This is a
153 change from having to report at least one or all topic-specific disclosures as per the existing
154 Core or Comprehensive options respectively.

155 **The reasons for omission now apply to requirements, not disclosures, and omissions are**
156 **not permitted for any requirements in the GRI 102 and GRI 103 exposure draft.** An
157 organization is permitted to use reasons for omission only if it cannot comply with requirements
158 within the appropriate disclosures in a Topic Standard. For disclosures in a Topic Standard that an
159 organization has determined as not appropriate, a reason for omission is not required.

160 Other revisions include:

- 161 • The first reason – 'Not applicable' now renamed 'Not appropriate' – only applies to
162 instances when a requirement does not contribute towards explaining the impacts related
163 to the organization's material topic.
- 164 • The fourth reason – 'Information unavailable' – has been revised to emphasize that it also
165 applies to situations where the information is incomplete or is not of adequate quality to
166 report.

167 Approach B: Reporting with reference to the GRI Standards

168 The exposure draft now clearly states **two reasons for reporting with reference to the GRI**
169 **Standards.** An organization can use selected GRI Standards, or parts of their content:

170 • to report information to meet the needs of specific information users for specific purposes
171 e.g., to comply with a specific reporting regulation on climate change; or

172 • if it is unable to meet all the requirements for reporting in accordance with the Standards.

173 An organization reporting with reference to the GRI Standards is now **required to publish a GRI**
174 **content index**, which includes the statement of use, and the GRI Standards and disclosures the
175 organization has used.

176 Statement of use

177 Each approach for using the GRI Standards has a corresponding **statement of use that the**
178 **organization is required to provide** (referred to as a ‘claim’ in the existing *GRI 101* and *GRI*
179 *102*). The changes include:

180 • The wording of the statements for both ‘reporting in accordance with the GRI Standards’
181 and ‘reporting with reference to the GRI Standards’ has changed.

182 • The statement of use is required to be included in the GRI content index.

183 • The highest governance body or most senior executive of the organization is now required
184 to acknowledge in the statement their responsibility for the reported information being
185 prepared in accordance with, or with reference to, the GRI Standards.

186 Section 4. Reporting principles

187 This section includes the following reporting principles from the existing *GRI 101*: **Accuracy,**
188 **Balance, Clarity, Comparability, Completeness, Sustainability Context, Reliability and**
189 **Timeliness**. The principles focus on ensuring the quality and proper presentation of the reported
190 information; this section no longer includes reporting principles for defining report content (i.e.,
191 material topics). The principles **have been revised** to improve their clarity and to align them with
192 other corporate reporting frameworks. The Reliability principle has been renamed ‘Verifiability’.

193 The existing principles of **Stakeholder Inclusiveness and Materiality are no longer**
194 **presented as standalone principles**. Section 2 of the GRI 103 exposure draft includes guidance
195 on how to identify material topics based on the Reporting Principles for defining report content in
196 the existing *GRI 101*. An organization is still required to identify its material topics, and to report
197 under Section 3 of the GRI 103 exposure draft how it has identified its material topics, including the
198 stakeholders that informed the process, and the material topics identified. More details about these
199 revisions are provided in the section ‘Significant proposals and changes to GRI 103’.

200 Section 5. Additional recommendations for sustainability reporting

201 This **new section** includes additional recommendations on aligning sustainability reporting with
202 other types of reporting and on methods for enhancing the credibility of sustainability reporting.

203 Aligning sustainability reporting with other reporting

204 This section recommends **aligning sustainability reporting with other statutory and**
205 **regulatory reporting, in particular, financial reporting**. This includes reporting information
206 for the same reporting period and for the same group of entities.

207 Enhancing the credibility of sustainability reporting

208 This section describes various methods that an organization can use to enhance the credibility of its
209 sustainability reporting. The section does not introduce new content but incorporates the existing
210 guidance from Disclosure 102-56 in *GRI 102* on the use of external assurance, internal controls, and
211 stakeholder or expert panels. This includes a **recommendation for** an organization to put in place

212 **internal controls** to strengthen the overall integrity and credibility of its sustainability reporting
213 and to seek **external assurance** for its sustainability reporting.

214 Significant proposals and changes to GRI 215 I 02

216 The GRI I 02 exposure draft contains disclosures for contextual information about the organization.
217 These include disclosures that provide details about the organization and its reporting practices,
218 activities, governance, responsible business conduct policies and practices, and stakeholder
219 engagement.

220 Reporting all disclosures with no omissions

221 The introduction to the GRI I 02 exposure draft confirms the requirement set out in Section 3.1 of
222 the GRI I 01 exposure draft, that information required by the disclosures in the GRI I 02 exposure
223 draft cannot be omitted. All information required by the disclosures in GRI I 02 exposure draft is
224 considered critical for information users to understand the organization and its context.

225 Changes to the structure

226 The content of the existing *GRI I 02* has been restructured into the following sections:

227 **Section 1. Introduction**, which reminds the organization that omissions are not permitted for the
228 disclosures in the GRI I 02 exposure draft, and directs the organization on what to do if it does not
229 have a committee, policy, practice or other process required by a disclosure.

230 **Section 2. Organizational details and reporting practices** contains five disclosures, which
231 provide an overview of the organization, its sustainability reporting practices, and the entities
232 covered in its sustainability reporting.

233 **Section 3. Organizational activities** contains two disclosures which cover the organization's
234 activities, and its employees and other workers.

235 **Section 4. Governance** contains fifteen disclosures, which provide an overview of the
236 organization's governance structure, composition, roles, and remuneration.

237 **Section 5. Responsible business conduct** contains seven disclosures, which provide an overview
238 of the organization's policies and practices for responsible business conduct, including new
239 requirements to report on human rights.

240 **Section 6. Stakeholder engagement** contains two disclosures, which cover the organization's
241 stakeholder engagement practices, including how it engages in collective bargaining with employees.

242 This restructuring provides a more coherent order and grouping for the organization to work
243 through the disclosures.

244 Combining disclosures

245 Existing disclosures have been combined where possible to group similar items together.

246 An overview of which disclosures have been combined can be found in Appendix 2.

247 New and revised disclosures and requirements

248 The GRI 102 exposure draft includes the following **new requirements**:

- 249 • **REP-2 Organization's entities included in its sustainability reporting** now requires
250 reporting the entities included in the organization's sustainability reporting, rather than the
251 entities included in its consolidated financial statements, and any differences between the
252 entities included in the organization's sustainability reporting and financial reporting. It
253 includes an additional requirement for the organization to explain its approach to
254 consolidating the information when the organization consists of multiple entities that form a
255 consolidated group.
- 256 • **REP-3 Reporting period and frequency** includes an additional requirement for the
257 organization to specify the reporting period for its financial reporting and to explain if its
258 reporting periods for financial reporting and sustainability reporting do not align.
- 259 • **ACT-1 Activities, value chain, and other business relationships** combines
260 requirements from Disclosures 102-6, 102-7, 102-9, and 102-10 in the existing *GRI 102* and
261 includes additional requirements for the organization to report on the characteristics of
262 entities in its value chain (both upstream and downstream from the organization) and their
263 related activities, and any other relevant business relationships not included within its value
264 chain.
- 265 • **ACT-2 Employees and other workers** includes additional requirements to report the
266 total number of employees by employment type, by region; contextual information about its
267 employee numbers; and the total number of workers who are not employees and whose
268 work is controlled by the organization, including the most common types of worker and
269 their contractual relationship with the organization.
- 270 • **GOV-3 Responsibilities for sustainable development topics and delegation** now
271 requires further information on the role and responsibilities of the highest governance body
272 with regard to decision-making for sustainable development topics, the internal resources
273 that the organization has for managing these topics, and the process and frequency for
274 reporting to the highest governance body on these topics.
- 275 • **GOV-10 Identification and management of impacts** now requires further
276 information on the role of any committees of the highest governance body with specific
277 responsibilities for the organization's processes to identify and manage sustainable
278 development topics and their related impacts, and how the highest governance body
279 considers and reviews the outcomes of these processes and how frequently it reviews the
280 effectiveness of these processes.
- 281 • **GOV-14 Process for determining remuneration** now requires further information on
282 the process for determining the organization's remuneration policies, and whether
283 independent members of the highest governance body or an independent remuneration
284 committee oversee the process.
- 285 • **SE-2 Collective bargaining agreements** includes an additional requirement for the
286 organization to report whether it uses collective bargaining agreements to determine the
287 working conditions and terms of employment for those employees who are not directly
288 covered by a collective bargaining agreement.

289 The following disclosures **incorporate the recommendations of the GRI Technical**
290 **Committee on Human Rights Disclosure:**

- 291 • **RBC-2 Policy commitments** includes Disclosures 102-11 and 102-16 from the existing
292 *GRI 102*, and new requirements to report on the organization’s policy commitments for
293 responsible business conduct, including its specific policy commitment to respect human
294 rights and its commitment to conduct due diligence. It also requires further information
295 about these policy commitments, such as how they are approved and communicated.
- 296 • **RBC-3 Embedding the policy commitments throughout the organization** is a new
297 disclosure that requires the organization to describe how it embeds the policy
298 commitments reported in RBC-2 throughout its activities and business relationships.
- 299 • **RBC-4 Grievance mechanisms and other remediation processes** includes
300 Disclosure 103-2-c-vi from the existing *GRI 103* and requires specific information on the
301 grievance mechanisms and other remediation processes that the organization has
302 established or participates in to provide for or cooperate in the remediation of negative
303 impacts.
- 304 • **SE-1 Approach to stakeholder engagement** includes Disclosures 102-40, 102-42, and
305 102-43 from the existing *GRI 102* and requires further information on meaningful
306 stakeholder engagement.

307 A new disclosure on compliance with laws and regulations (**RBC-6**) has been included using
308 content from existing Topic Standards: [GRI 307: Environmental Compliance 2016](#) and [GRI 419:](#)
309 [Socioeconomic Compliance 2016](#). Currently, organizations only report these disclosures when they
310 identify environmental and socioeconomic compliance as material topics. However, this disclosure is
311 now required from all organizations, given that compliance with laws and regulations constitutes
312 critical information for understanding an organization’s responsible business conduct practices.

313 See Appendix 2 for an overview of how the revised disclosures in the GRI 102 exposure draft
314 correspond to the existing disclosures in *GRI 102*.

315 Relocation of disclosures

316 The following disclosures have been removed from the existing *GRI 102* and the
317 requirements have now been included in the **GRI 101** exposure draft:

- 318 • **102-54 Claims of reporting in accordance with the GRI Standards**, included in
319 Section 3.1 as a requirement for reporting in accordance with the Standards.
- 320 • **102-55 GRI content index**, included in Sections 3.1 and 3.2 as a requirement for
321 reporting in accordance with, or with reference to, the GRI Standards.

322 The following disclosures have been moved from the existing *GRI 102* to the **GRI 103**
323 exposure draft:

- 324 • **102-46 Defining report content and topic Boundaries and 102-49 Changes in**
325 **reporting**, moved to Disclosure MT-1 Identification of material topics and related impacts.
- 326 • **102-47 List of material topics**, moved to Disclosure MT-2 Material topics and related
327 impacts.

328 Removed disclosures

329 The following existing disclosures have been removed from the exposure draft:

- 330 • 102-12 External initiatives
- 331 • 102-15 Key impacts, risks, and opportunities
- 332 • 102-44 Key topics and concerns raised
- 333 • 102-51 Date of most recent report
- 334 • 102-53 Contact point for questions regarding the report

335 An explanation for why these disclosures have been removed can be found in Appendix 3.

336 Significant proposals and changes to GRI

337 103

338 The GRI 103 exposure draft includes guidance for identifying material topics, and contains
339 disclosures about the organization's material topics and related impacts, how it identifies its material
340 topics, and how it manages each material topic.

341 Reporting all disclosures with no omissions

342 The introduction to the GRI 103 exposure draft confirms the requirement set out in Section 3.1 of
343 the GRI 101 exposure draft, that information required by the disclosures in the GRI 103 exposure
344 draft cannot be omitted. All information required by the disclosures in GRI 103 exposure draft is
345 considered critical for information users to understand the organization's approach to its material
346 topics.

347 Section 1. Introduction

348 This section reminds the organization that omissions are not permitted for the disclosures in the
349 GRI 103 exposure draft, and directs the organization on what to do if it has not developed or
350 implemented a policy, practice or other process required by a disclosure.

351 Section 2. Identifying material topics

352 This section clarifies how to identify material topics, based on the expectations contained in the
353 Reporting Principles for defining report content in the existing *GRI 101*.

354 This section provides further guidance for identifying impacts, assessing their significance, and
355 prioritizing them for reporting – in line with the expectations included in key instruments such as
356 the *UN Guiding Principles on Business and Human Rights*, the *OECD Guidelines for Multinational*
357 *Enterprises*, and the *OECD Due Diligence Guidance for Responsible Business Conduct*.

358 In addition, the term **'topic Boundary'** has been removed and the concept revised to address
359 challenges in the understanding and application of this concept. The exposure draft of GRI 103 now
360 makes clear that the organization should consider actual and potential negative impacts it causes or
361 contributes to through its own activities, as well as those directly linked to its operations, products,
362 or services by its business relationships. The concepts of 'cause', 'contribute to', and 'directly linked
363 to' have been further explained, and they are used only in the context of negative impacts (not

364 positive impacts), in line with the aforementioned instruments. The requirement to report the topic
365 Boundary for each material topic – now within disclosure MT-2 – has also been revised (more
366 details about this revision are provided in the next section).

367 Section 3. Reporting on material topics

368 This section contains three disclosures, which are based on the disclosures in the existing *GRI 102*
369 and *GRI 103* that relate to reporting on material topics. These disclosures have been revised in line
370 with the recommendations of the GRI Technical Committee on Human Rights Disclosure, in order
371 to align them more closely with the expectation of due diligence.

372 MT-1 Identification of material topics and related impacts

373 This disclosure covers content from Disclosures 102-46 (defining report content and topic
374 Boundaries) and 102-49 (changes to the list of material topics) from the existing *GRI 102*. It now
375 requires further information on how the organization has identified its impacts, how it has
376 prioritized them for reporting based on their significance, and the stakeholders and experts whose
377 views have informed the identification of material topics.

378 MT-2 Material topics and related impacts

379 This disclosure covers content from Disclosure 102-47 (list of material topics) from the existing *GRI*
380 *102* and Disclosure 103-1 (explanation of the material topic and its Boundary) from the existing *GRI*
381 *103*. In addition, it now requires a description of the impacts identified for each material topic.

382 The requirement to report the ‘topic Boundary’ has been revised, and the term ‘topic Boundary’ is
383 no longer used. It now requires the organization to report, for each material topic, whether it is
384 involved with the negative impacts through its own activities or as a result of its business
385 relationships.

386 MT-3 Management of material topics and related impacts

387 This disclosure covers content from Disclosures 103-2 (the management approach and its
388 components) and 103-3 (evaluation of the management approach) from the existing *GRI 103*. It now
389 requires additional information on actions taken to prevent, mitigate, and remediate negative impacts
390 (in line with the expectation of due diligence), as well as information on engagement with
391 stakeholders.

392 Superseded Standards

393 The following Topic Standards will be superseded by the revised Universal Standards:

- 394 • GRI 307: Environmental Compliance 2016, the content has been incorporated into the
395 exposure draft of GRI 102.
- 396 • GRI 412: Human Rights Assessment 2016, the content has been incorporated into the
397 exposure draft of GRI 102 and GRI 103.
- 398 • GRI 419: Socioeconomic Compliance 2016, the content has been incorporated into the
399 exposure draft of GRI 102.

400 This means that these three Standards will be withdrawn once the revised Universal Standards are
401 published.

402 GSSB's involvement and views on the 403 development of the exposure draft

404 The proposed revisions to the Universal Standards were discussed by the GSSB during their in-
405 person meeting in September 2019, and during public and private sessions organized between
406 August 2019 and April 2020.

407 A sub-committee of four GSSB members was convened to provide overall advice and direction for
408 this project.

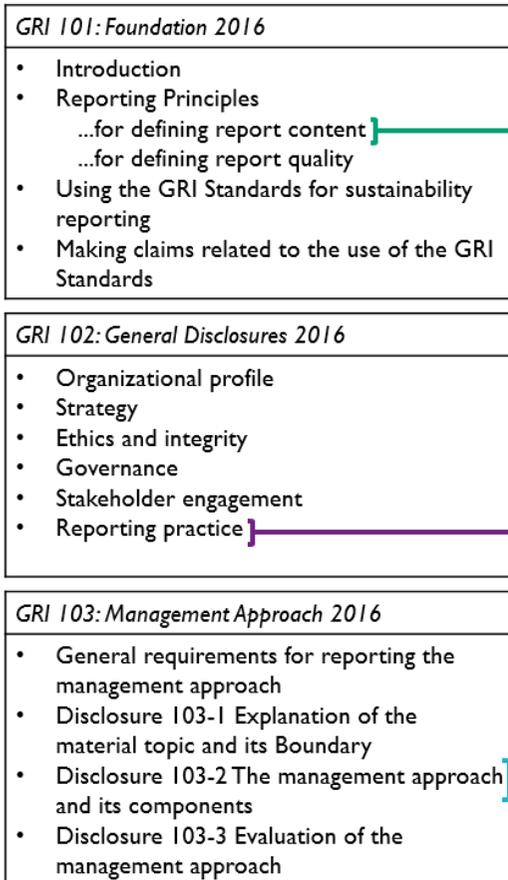
409 The GSSB confirmed its support for the revisions to the Universal Standards when it voted to
410 approve the draft for public exposure at its meeting on 20 May 2020.

411 Meeting minutes and recordings of the public meetings can be accessed on the [GSSB website](#).

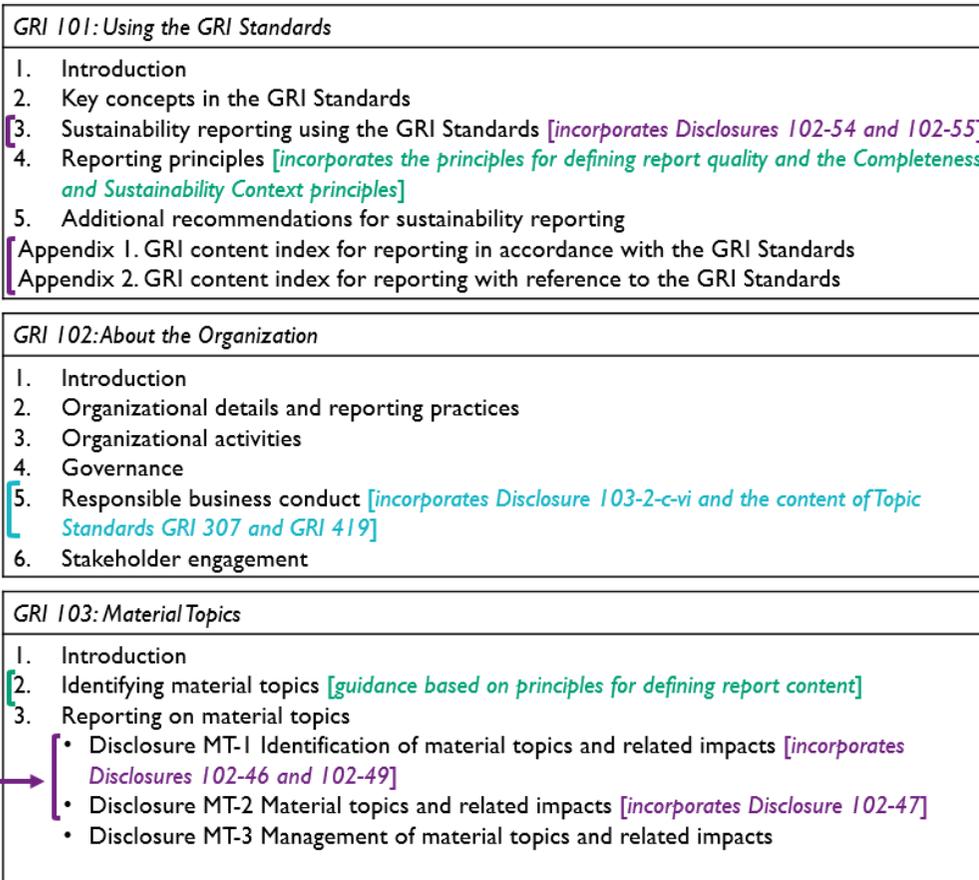
412 **Appendix I. Relocation of content between the Universal Standards**

413 The following diagram shows the proposed relocation of content between the existing Universal Standards and the exposure draft. To facilitate reading, the
 414 diagram does not show instances where content has been revised but remains in the same Standard.

Structure of existing Universal Standards: (2016)



Proposed structure in the exposure draft of the Universal Standards:



415 **Appendix 2. Overview of how the revised disclosures in the**
 416 **GRI 102 and GRI 103 exposure draft correspond to existing**
 417 **disclosures in the GRI Standards**

418 Note that this table provides an understanding of where the content from existing GRI Standards
 419 and disclosures can be found in the exposure draft, but it does not indicate new requirements,
 420 revised requirements, or requirements that have been removed. A detailed mapping of changes is
 421 available on the [GRI Standards website](#).

GRI 102: About the Organization	Disclosures in existing GRI Standards	
Revised disclosures in the GRI 102 exposure draft	Existing disclosures	Section in existing GRI 102
Section 2. Organizational details and reporting practices		
REP-1 Organizational details	102-1 Name of the organization 102-3 Location of headquarters 102-4 Location of operations 102-5 Ownership and legal form	1. Organizational profile
REP-2 Organization’s entities included in its sustainability reporting	102-45 Entities included in the consolidated financial statements	6. Reporting practice
REP-3 Reporting period and frequency	102-50 Reporting period 102-52 Reporting cycle	6. Reporting practice
REP-4 Restatements of information	102-48 Restatements of information	6. Reporting practice
REP-5 External assurance	102-56 External assurance <i>(The guidance on internal controls, external assurance, and stakeholder panels has moved to GRI 101 Section 5.2)</i>	6. Reporting practice

Section 3. Organizational activities

ACT-1 Activities, value chain, and other business relationships	<p>102-2 Activities, brands, products, and services</p> <p>102-6 Markets served</p> <p>102-7 Scale of the organization <i>(107-a-ii, iii and v – total number of operations, net sales or net revenues, and quantity of products/services provided – included in the guidance)</i></p> <p>102-9 Supply chain</p> <p>102-10 Significant changes to the organization and its supply chain</p>	I. Organizational profile
ACT-2 Employees and other workers	<p>102-7 Scale of the organization <i>(102-7-a-i – total number of employees is now requirement ACT-2-a)</i></p> <p>102-8 Information on employees and other workers</p>	I. Organizational profile

Section 4. Governance

GOV-1 Governance structure and composition	<p>102-18 Governance structure</p> <p>102-22 Composition of the highest governance body and its committees</p>	4. Governance
GOV-2 Nomination and selection of the highest governance body	102-24 Nominating and selecting the highest governance body	4. Governance
GOV-3 Responsibilities for sustainable development topics and delegation	<p>102-19 Delegating authority</p> <p>102-20 Executive-level responsibility for economic, environmental, and social topics</p>	4. Governance
GOV-4 Stakeholder consultation on sustainable development topics	102-21 Consulting stakeholders on economic, environmental, and social topics	4. Governance
GOV-5 Chair of the highest governance body	102-23 Chair of the highest governance body	4. Governance
GOV-6 Conflicts of interest	102-25 Conflicts of interest	4. Governance
GOV-7 Role of the highest governance body in setting purpose, values, and strategy	102-26 Role of highest governance body in setting purpose, values, and strategy	4. Governance
GOV-8 Collective knowledge of the highest governing body	102-27 Collective knowledge of highest governance body	4. Governance

GOV-9 Evaluation of the performance of the highest governance body	102-28 Evaluating the highest governance body's performance	4. Governance
GOV-10 Identification and management of impacts	102-29 Identifying and managing economic, environmental, and social impacts 102-30 Effectiveness of risk management processes 102-31 Review of economic, environmental, and social topics	4. Governance
GOV-11 Role of the highest governance body in sustainability reporting	102-32 Highest governance body's role in sustainability reporting	4. Governance
GOV-12 Communication of critical concerns	102-33 Communicating critical concerns 102-34 Nature and total number of critical concerns	4. Governance
GOV-13 Remuneration policies	102-35 Remuneration policies	4. Governance
GOV-14 Process for determining remuneration	102-36 Process for determining remuneration 102-37 Stakeholders' involvement in remuneration	4. Governance
GOV-15 Annual total compensation ratio	102-38 Annual total compensation ratio 102-39 Percentage increase in annual total compensation ratio	4. Governance
Section 5. Responsible business conduct		
RBC-1 Statement on sustainable development strategy	102-14 Statement from senior decision-maker	2. Strategy
RBC-2 Policy commitments	102-11 Precautionary Principle or approach 102-16 Values, principles, standards, and norms of behavior	1. Organizational profile 3. Ethics and integrity
RBC-3 Embedding the policy commitments throughout the organization	-	-
RBC-4 Grievance mechanisms and other remediation processes	Requirement 103-2-c-vi from <i>GRI 103</i>	-
RBC-5 Mechanisms for seeking advice and raising concerns	102-17 Mechanisms for advice and concerns about ethics	3. Ethics and integrity

RBC-6 Compliance with laws and regulations	307-1 from GRI 307: <i>Environmental Compliance 2016</i> 419-1 from GRI 419: <i>Socioeconomic Compliance 2016</i>	-
RBC-7 Membership associations	102-13 Membership of associations	1. Organizational profile
Section 6. Stakeholder engagement		
SE-1 Approach to stakeholder engagement	102-40 List of stakeholder groups 102-42 Identifying and selecting stakeholders 102-43 Approach to stakeholder engagement	5. Stakeholder engagement
SE-2 Collective bargaining agreements	102-41 Collective bargaining agreements	5. Stakeholder engagement

GRI 103: Material Topics	Disclosures in existing GRI Standards	
Revised disclosures in the GRI 103 exposure draft	Existing disclosures	Section in existing GRI 102
MT-1 Identification of material topics and related impacts	102-46 Defining report content and topic Boundaries 102-49 Changes in reporting	6. Reporting practice
MT-2 Material topics and related impacts	102-47 List of material topics 103-1 Explanation of the material topic and its Boundary	6. Reporting practice -
MT-3 Management of material topics and related impacts	103-2 The management approach and its components 103-3 Evaluation of the management approach	-

422 **Appendix 3. Overview of removed disclosures**

Existing GRI 102 disclosure	Explanation for removal
102-12 External initiatives	This information does not necessarily provide contextual information for understanding an organization’s impacts and how the organization is managing them. Organizations can still report external initiatives if they wish. The Guidance to RBC-2-a-i states: ‘The organization can also make a reference to other standards or initiatives that it participates in.’
102-15 Key impacts, risks, and opportunities	This disclosure overlaps with requirements in other disclosures. In addition, feedback showed that there was confusion over the use of the term ‘key impacts’ when compared with significant impacts, which organizations are required to consider when identifying material topics.
102-44 Key topics and concerns raised	This disclosure overlaps with requirements in other disclosures about the identification of material topics and the stakeholders that have informed the process.
102-51 Date of most recent report	This disclosure is unclear for first-time reporters, and previous reports are usually publicly available on corporate websites.
102-53 Contact point for questions regarding the report	This information can be found on the organization's website and organizations can still report it if they wish.