



# Item 05 – GRI Sector Standard Project for Financial Services: Capital Markets Sector Standard – Exposure draft

## For GSSB approval

<b>Date</b>	20 December 2024
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<b>Project</b>	GRI Sector Standards Project for Financial Services
<b>Description</b>	<p>This document sets out the exposure draft of the GRI Sector Standard for capital markets. The document is submitted for GSSB approval for public exposure.</p> <p>If approved, the public exposure is proposed to commence in early March 2025 and run until the end of May 2025.</p>

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## 2 Introduction

3 *GRI XX: Capital Markets Sector 202X* provides information for organizations in the capital markets  
4 sector about their likely material topics. These topics are likely to be material for organizations in the  
5 capital markets sector on the basis of the sector's most significant impacts on the economy,  
6 environment, and people, including on their human rights.

7 *GRI XX* also contains a list of disclosures for organizations in the capital markets sector to report in  
8 relation to each likely material topic. This includes disclosures from the GRI Topic Standards and  
9 other sources.

10 The Standard is structured as follows:

- 11 • [Section 1](#) provides a high-level overview of the capital markets sector, including its activities,  
12 business relationships, context, and the connections between the United Nations Sustainable  
13 Development Goals (SDGs) and the likely material topics for the sector.
- 14 • [Section 2](#) outlines the topics that are likely to be material for organizations in the capital markets  
15 sector and therefore potentially merit reporting. For each likely material topic, the sector's most  
16 significant impacts are described and disclosures to report information about the organization's  
17 impacts in relation to the topic are listed.
- 18 • The [Glossary](#) contains defined terms with a specific meaning when used in the GRI Standards.  
19 The terms are underlined in the text and linked to the definitions.
- 20 • The [Bibliography](#) lists authoritative intergovernmental instruments and additional references used  
21 in developing this Standard, listed by topic. It also lists further resources that the organization can  
22 consult.

23 The rest of the Introduction section provides an overview of the sector this Standard applies to, an  
24 overview of the system of GRI Standards, and further information on using this Standard.

## 25 Sector this Standard applies to

26 *GRI XX* applies to organizations undertaking any of the following:

- 27 • Asset ownership
- 28 • Asset management
- 29 • Wealth management
- 30 • Custodian activities
- 31 • Investment advisory

32 This Standard can be used by any organization in the capital markets sector, regardless of size, type,  
33 geographic location, or reporting experience.

34 The organization must use all applicable Sector Standards for the sectors in which it has substantial  
35 activities.

## 36 Sector classifications

37 Table 1 lists industry groupings relevant to the capital markets sector covered in this Standard in the  
38 Global Industry Classification Standard (GICS®) [1], the Industry Classification Benchmark (ICB) [2],  
39 the International Standard Industrial Classification of All Economic Activities (ISIC) [3], and the  
40 Sustainable Industry Classification System (SICS®) [4].<sup>1</sup> The table is intended to assist an  
41 organization in identifying whether *GRI XX* applies to it and is for reference only.

42 **Table 1. Industry groupings relevant to the capital markets sector in other classification**  
43 **systems**

Classification system	Classification number	Classification name
<b>GICS®</b>	40203010	Asset Management & Custody Banks
	40203030	Diversified Capital Markets
<b>ICB</b>	30202000	Diversified Financial Services
	30202010	Asset Managers & Custodians
<b>ISIC</b>	642	Holding companies
	643	Trusts
	6499	Other financial services activities
	653	Pension funds
	6619	Other activities auxiliary to financial services
	663	Fund management
<b>SICS®</b>	FN-AC	Asset Management & Custody Activities

<sup>1</sup> The relevant industry groupings in the Statistical Classification of Economic Activities in the European Community (NACE) [5] and the North American Industry Classification System (NAICS) [6] can also be established through available concordances with the International Standard Industrial Classification (ISIC).

## 44 System of GRI Standards

45 This Standard is part of the GRI Sustainability Reporting Standards (GRI Standards). The GRI  
46 Standards enable an organization to report information about its most significant impacts on the  
47 economy, environment, and people, including impacts on their human rights, and how it manages  
48 these impacts.

49 The GRI Standards are structured as a system of interrelated standards that are organized into three  
50 series: GRI Universal Standards, GRI Sector Standards, and GRI Topic Standards (see [Figure 1](#) in  
51 this Standard).

### 52 **Universal Standards: GRI 1, GRI 2 and GRI 3**

53 [GRI 1: Foundation 2021](#) specifies the requirements that the organization must comply with to report in  
54 accordance with the GRI Standards. The organization begins using the GRI Standards by consulting  
55 [GRI 1](#).

56 [GRI 2: General Disclosures 2021](#) contains disclosures that the organization uses to provide  
57 information about its reporting practices and other organizational details, such as its activities,  
58 governance, and policies.

59 [GRI 3: Material Topics 2021](#) provides guidance on how to determine material topics. It also contains  
60 disclosures that the organization uses to report information about its process of determining material  
61 topics, its list of material topics, and how it manages each topic.

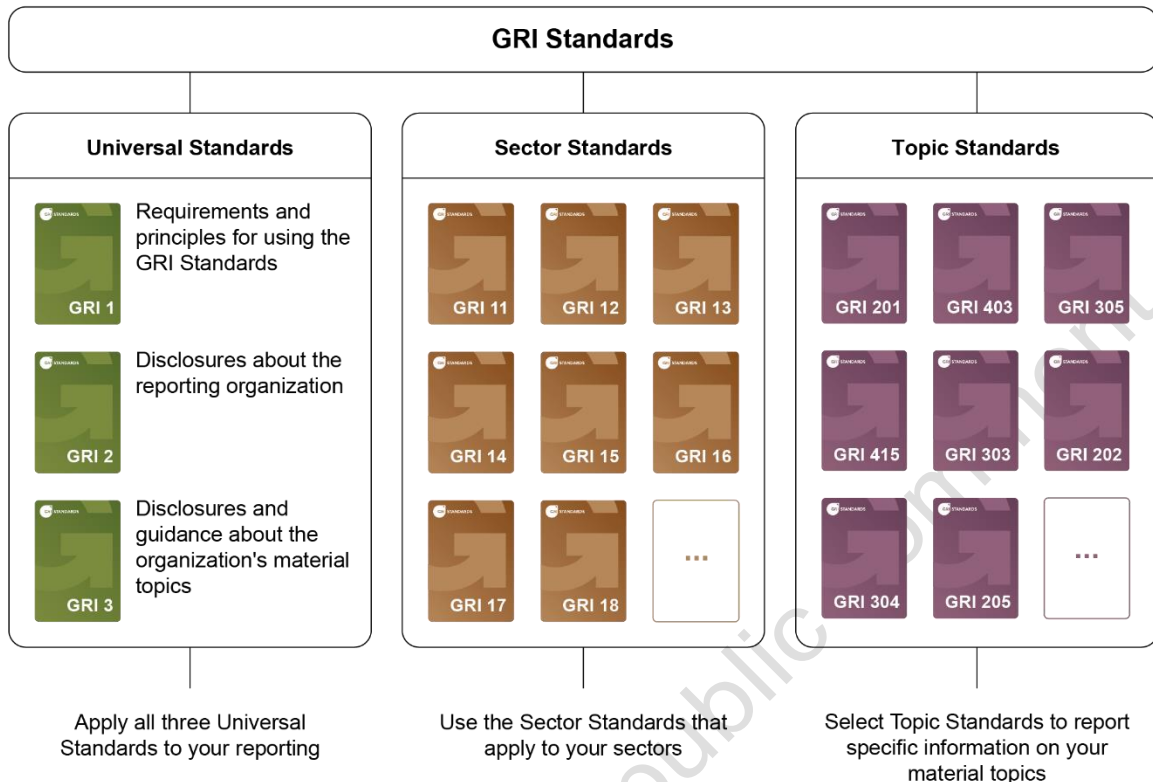
### 62 **Sector Standards**

63 The Sector Standards provide information for organizations about their likely material topics. The  
64 organization uses the Sector Standards that apply to its sectors when determining its material topics  
65 and when determining what to report for each material topic.

### 66 **Topic Standards**

67 The Topic Standards contain disclosures that the organization uses to report information about its  
68 impacts in relation to particular topics. The organization uses the Topic Standards according to the list  
69 of material topics it has determined using [GRI 3](#).

70 **Figure 1. GRI Standards: Universal, Sector and Topic Standards**



71 **Using this Standard**

72 An organization in the capital markets sector reporting in accordance with the GRI Standards is  
 73 required to use this Standard when determining its material topics and then when determining what  
 74 information to report for the material topics.

75 **Determining material topics**

76 Material topics represent an organization's most significant impacts on the economy, environment,  
 77 and people, including their human rights.

78 [Section 1](#) of this Standard provides contextual information that can help the organization in identifying  
 79 and assessing its impacts.

80 [Section 2](#) outlines the topics that are likely to be material for organizations in the capital markets  
 81 sector. The organization is required to review each topic described and determine whether it is a  
 82 material topic for it.

83 The organization needs to use this Standard when determining its material topics. However,  
 84 circumstances for each organization vary, and the organization needs to determine its material topics  
 85 according to its specific circumstances, such as its business model; geographic, cultural, and legal  
 86 operating context; ownership structure; and the nature of its impacts. Because of this, not all topics  
 87 listed in this Standard may be material for all organizations in the capital markets sector. See [GRI 3:  
 88 Material Topics 2021](#) for step-by-step guidance on how to determine material topics.

89 If the organization has determined any of the topics included in this Standard as not material, then the  
 90 organization is required to list them in the GRI content index and explain why they are not material.

91 See [Requirement 3 in GRI 1: Foundation 2021](#) and [Box 5 in GRI 3](#) for more information on using  
 92 Sector Standards to determine material topics.

## 93 **Determining what to report**

94 For each material topic, an organization reports information about its impacts and how it manages  
95 these impacts.

96 Once an organization has determined a topic included in this Standard to be material, the Standard  
97 also helps the organization identify disclosures to report information about its impacts relating to that  
98 topic.

99 For each topic in [section 2](#) of this Standard, a reporting sub-section is included. These sub-sections  
100 list disclosures from the GRI Topic Standards that are relevant to the topic. They may also list  
101 additional sector disclosures and recommendations for the organization to report. This is done in  
102 cases where the Topic Standards do not provide disclosures, or where the disclosures from the Topic  
103 Standards do not provide sufficient information about the organization's impacts in relation to a topic.  
104 These additional sector disclosures and recommendations may be based on other sources. [Figure 2](#)  
105 illustrates how the reporting included in each topic is structured.

106 The organization is required to report the disclosures from the Topic Standards listed for those topics  
107 it has determined to be material. If any of the Topic Standards disclosures listed are not relevant to  
108 the organization's impacts, the organization is not required to report them. However, the organization  
109 is required to list these disclosures in the GRI content index and provide 'not applicable' as the reason  
110 for omission for not reporting the disclosures. See [Requirement 6 in GRI 1: Foundation 2021](#) for more  
111 information on reasons for omission.

112 The additional sector disclosures and recommendations outline further information which has been  
113 identified as relevant for organizations in the capital markets sector to report in relation to a topic. The  
114 organization should provide sufficient information about its impacts in relation to each material topic,  
115 so that information users can make informed assessments and decisions about the organization. For  
116 this reason, reporting these additional sector disclosures and recommendations is encouraged,  
117 however it is not a requirement.

118 When the organization reports additional sector disclosures, it is required to list them in the GRI  
119 content index (see [Requirement 7 in GRI 1](#)).

120 If the organization reports information that applies to more than one material topic, it does not need to  
121 repeat it for each topic. The organization can report this information once, with a clear explanation of  
122 all the topics it covers.

123 If the organization intends to publish a standalone sustainability report, it does not need to repeat  
124 information that it has already reported publicly elsewhere, such as on web pages or in its annual  
125 report. In such a case, the organization can report on a required disclosure by providing a reference in  
126 the GRI content index as to where this information can be found (e.g., by providing a link to the web  
127 page or citing the page in the annual report where the information has been published).

128 See [Requirement 5 in GRI 1](#) for more information on using Sector Standards to report disclosures.

## 129 **GRI Sector Standard reference numbers**

130 GRI Sector Standard reference numbers are included for all disclosures listed in this Standard, both  
131 those from GRI Standards and additional sector disclosures. When listing the disclosures from this  
132 Standard in the GRI content index, the organization is required to include the associated GRI Sector  
133 Standard reference numbers (see [Requirement 7 in GRI 1: Foundation 2021](#)). This identifier helps  
134 information users assess which of the disclosures listed in the applicable Sector Standards are  
135 included in the organization's reporting.

## 136 **Defined terms**

137 Defined terms are underlined in the text of the GRI Standards and linked to their definitions in the  
138 [Glossary](#). The organization is required to apply the definitions in the Glossary.

## 139 **References and resources**

140 The authoritative intergovernmental instruments and additional references used in developing this  
141 Standard, as well as further resources that may help report on likely material topics and can be

142 consulted by the organization are listed in the [Bibliography](#). These complement the references and  
 143 resources listed in [GRI 3: Material Topics 2021](#) and in the GRI Topic Standards.

144 **Figure 2. Structure of reporting included in each topic**

Reporting on local communities		
If the organization has determined local community is a material topic, this section lists the disclosures that have been identified as relevant for reporting on the topic by the oil and gas sector.		
STANDARD	DISCLOSURE	SECTOR STANDARD REF #
<b>1</b>	<b>Management of the topic</b>	<b>5</b>
GRI 3: Material Topics	Disclosure 3-3 Management of material topics  <b>3</b> <b>Additional sector recommendations</b> <ul style="list-style-type: none"> <li>Describe the means for identifying stakeholders and engaging with local communities.</li> <li>List the vulnerable groups that the organization has identified.</li> <li>List any collective or individual rights that the organization has determined to be of particular concern to the local communities.<sup>1</sup></li> <li>Describe the approach of the organization to engaging with vulnerable groups, including:               <ul style="list-style-type: none"> <li>How it seeks to ensure engagement is meaningful, and</li> <li>How it seeks to ensure safe and equitable gender participation.</li> </ul> </li> </ul>	11.15.1
<b>2</b>	<b>Topic Standards disclosures</b>	
GRI 413: Local Communities 2018	Disclosure 413-1 Operations with local community engagement, impact assessments, and development programs  Disclosure 413-2 Operations with significant actual and potential negative impacts on local communities  <b>3</b> <b>Additional sector recommendations</b> <ul style="list-style-type: none"> <li>Describe impacts on the health of local communities as a result of activities to pollution caused by the organization's operations or use of hazardous substances.</li> </ul>	11.15.2 11.15.3
<b>4</b>	<b>Additional sector disclosures</b>	
	Report the number and type of grievances filed by local communities, including: <ul style="list-style-type: none"> <li>the percentage of these grievances that were addressed and resolved,</li> <li>the percentage of grievances that were resolved through remediation.</li> </ul>	11.15.4

**1 Management of the topic**  
 The organization is required to report how it manages each material topic using [Disclosure 3-3 in GRI 3: Material Topics 2021](#).

**2 Topic Standard disclosures**  
 Disclosures from the GRI Topic Standards that are relevant to the topic are listed here. When the topic is determined by the organization as material, it is required to report these disclosures (if they are relevant to its impacts) or explain why they are not applicable in the GRI content index. See the Topic Standard for the content of the disclosure, including requirements, recommendations, and guidance.

**3 Additional sector recommendations**  
 Additional sector recommendations may be listed. These complement Topic Standard disclosures and Disclosure 3-3 with sector-specific reporting expectations. These are recommended to report, but not required.

**4 Additional sector disclosures**  
 Additional sector disclosures may be listed. Reporting these, together with any Topic Standard disclosures, ensures the organization provides sufficient information about its impacts in relation to the topic. These are recommended to report, but not required.

**5 Sector Standard reference numbers**  
 GRI Sector Standard reference numbers are required to be included in the GRI content index. This helps information users assess which of the disclosures listed in the Sector Standards are included in the organization's reporting.

Exposu



# 1. Sector profile

Capital markets cover financial markets where capital is raised and deployed through various financial instruments, including debt and equity. In 2024, the global bond market was estimated at approximately USD 139 trillion [5]. The capital markets sector comprises organizations that influence and direct the allocation of capital to other organizations and activities in all sectors of the economy, with varying levels of investment discretion.

Organizations in the sector, including asset managers, wealth managers, and custodians, play distinct roles in the investment process while managing investments and safeguarding financial assets. Asset managers appointed by asset owners or other asset managers must adhere to a fiduciary duty in their operations. This entails making investment decisions in the best interest of their clients.

Asset owners are characterized by their investment discretion, which includes making decisions about allocating all or most of their assets. Asset owners, including pension funds, sovereign wealth funds, high-net-worth individuals, family offices, endowments, and foundations, often act with long-term investment motivation. They are frequently accountable to beneficiaries or the government. Asset owners establish pre-agreed or marketed investment objectives with asset managers to balance risk and generate expected financial returns.

## Sector activities and business relationships

Through their activities and business relationships, organizations can have an effect on the economy, environment, and people and, in turn, make negative or positive contributions to sustainable development. When determining its material topics, the organization should consider the impacts of both its activities and its business relationships. See [section 1 in GRI 3: Material Topics 2021](#) for more information.

### Activities

The impacts of an organization vary according to the types of activities it undertakes. The following list outlines some of the key activities of the capital markets sector, as defined in this Standard. This list is not exhaustive.

**Asset manager selection:** Asset owners and managers regularly conduct selection processes to mandate asset management services. These processes typically include assessing an asset manager's investment returns, governance practices, and policies on incorporating sustainability in their investment practices.

**Asset management:** Managing a client's assets to reach agreed financial objectives through portfolio construction and investment decision-making. Risk assessment processes are implemented as part of asset management. These include screening investments by conducting research to evaluate organizations' financial health, governance practices, and sustainability commitments before investing.

**Investment consultancy:** Advisory and consultancy services include custodian activities, investment policy development, strategic asset allocation, investment research, and investment manager selection, appointment, and monitoring. Services provided do not include active asset management.

**Wealth management:** Services provided primarily to high-net-worth individuals that include portfolio management and financial planning, as well as tax planning, estate planning, and retirement strategies.

**Custodian activities:** Safeguarding and holding assets by custodians on behalf of their clients.

**Sustainability incorporation:** Ongoing consideration of sustainability factors within an investment analysis and decision-making process to maximize positive impacts and minimize negative ones.

**Thematic investing:** Selecting assets to access specified trends [16]. Trends can be related to environmental and social outcomes. Thematic investing also includes impact investing, where

194 investments are made to generate positive, measurable environmental and social impacts alongside a  
195 financial return.

196 **Investee stewardship:** Using investor rights and influence to protect and enhance overall long-term  
197 value for clients and beneficiaries, including the common economic, social, and environmental assets  
198 on which their interests depend [17]. Common investee stewardship tools include engagement and  
199 voting. Engagement can be conducted individually or collaboratively with other asset owners or  
200 managers. Individual engagement refers to direct engagement between an organization and a current  
201 or potential investee on responsible business conduct issues, such as addressing the issues with the  
202 investee's management. Voting comprises the formal right to vote on management or shareholder  
203 resolutions to express approval or disapproval on relevant matters.

204 **Product and service development:** Developing new investment products, including structuring them  
205 and providing services such as investment advisory, to meet clients' evolving needs.

206 **Fundraising and marketing:** Promoting and selling investment products and services to clients  
207 directly or through distributors, such as brokers.

## 208 **Business relationships**

209 An organization's business relationships include relationships that it has with business partners, with  
210 entities in its value chain including those beyond the first tier, and with any other entities directly linked  
211 to its operations, products, or services. The following types of business relationships are prevalent in  
212 the capital markets sector and are relevant when identifying the impacts of organizations in the sector.

213 **Investees** are public and private organizations, including businesses such as corporations,  
214 governments, and sovereigns, that capital markets organizations invest in for a financial return.

215 **Institutional clients**<sup>2</sup> include businesses such as corporations, non-profit organizations,  
216 governments, and sovereigns.

217 **Distributors** are third-party sales channels for the organizations' products and services, such as  
218 brokers.

219 **Suppliers** provide products and services to capital markets organizations to run their operations.  
220 These include data providers and analysts, as well as rating agencies.

221 **Investment consultants** include financial experts who guide asset owners and managers by  
222 providing investment product recommendations, strategic advice, and comprehensive planning  
223 services.

## 224 **The sector and sustainable development**

225 The capital markets sector plays an instrumental role in promoting sustainable and responsible  
226 investment practices, contributing to environmental protection, respecting human rights, and meeting  
227 the expectations of sustainability-conscious investors. Organizations in the sector can have impacts  
228 on sustainable development through two primary levers: investment decisions and stewardship  
229 activities. Investment decisions encompass pricing capital, structuring investments, asset allocation,  
230 and divestment. Broader stewardship activities involve investee and public policy engagement.

231 While incorporating sustainability in investing may be considered through the lens of risks and  
232 opportunities, organizations may extend their focus beyond profits towards their impacts and those of  
233 their investees on sustainable development. This shift in focus is driven by recognizing system-level  
234 risks, such as climate change, which endanger common assets like the environment on which long-  
235 term investor returns depend. Defining sustainability objectives and commitments, as well as  
236 incorporating sustainability considerations into investment policies and practices, is increasingly  
237 common in the sector. Incorporating sustainability can also lead to the creation of innovative financial  
238 instruments that support sustainable development and mitigate negative impacts. Examples include  
239 green bonds, sustainability-linked bonds, and blended finance structures. Functioning as stewards of

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<sup>2</sup> In the GRI Standards, customers are understood to include end-customers (consumers) as well as business-to-business customers. In this Standard, 'client' is used instead of 'customer' to align with commonly used sector terminology. When referring to 'clients' generally in this Standard, it covers both retail clients (end-customers [consumers]) and institutional clients (business-to-business customers).

240 clients' money, organizations are responsible for respecting human rights and protecting the  
241 environment [7]. The sector can positively influence corporate behavior with investee stewardship.  
242 Through engagement and voting, organizations can foster positive shifts in responsible business  
243 conduct and limit negative impacts from their investees.

244 Climate change mitigation and the need for a just transition are among the sector's main sustainable  
245 development challenges. Changes in capital flow are necessary for achieving net zero emissions by  
246 2050. Limiting global warming to well below 2°C while pursuing efforts to limit it to 1.5°C above pre-  
247 industrial levels requires an estimated USD 4.7 trillion annual investment in climate solutions between  
248 2021 and 2050 [18]. The sector can invest in renewable energy, energy-efficient technologies, and  
249 nature-based solutions, help carbon-intensive industries transition, and promote science-based  
250 transition plans. Additionally, emerging green technologies provide new investment opportunities,  
251 offering reliable returns for investors [19]. In addition to contributing to climate change mitigation,  
252 organizations can support climate change resilience by allocating capital to adaptation solutions. This  
253 is increasingly important as the physical impacts of climate change are experienced in many  
254 geographic locations and are set to increase with further global warming, resulting in further negative  
255 social, environmental and financial impacts.

256 Similarly, the sector plays an important supportive role in halting and reversing biodiversity loss by  
257 2030 [14]. The Kunming-Montreal Global Biodiversity Framework underscores the potential of  
258 leveraging private finance and fostering private sector investment in biodiversity. It also mandates that  
259 large financial institutions assess and disclose their impacts on biodiversity.

260 A thorough, proactive, and ongoing integration of human rights into investment strategies ensures that  
261 investments align with ethical standards and prevent and mitigate negative impacts, safeguarding  
262 investors' interests and the well-being of local communities and other stakeholders. Conducting  
263 human rights due diligence on potential and current investments is motivated by various factors,  
264 including owner mandates, investment policies and strategies, and expectations set by authoritative  
265 instruments [10], [20]. Organizations in the sector are expected to respect workers' rights, providing a  
266 safe and healthy working environment in line with the ILO Declaration on Fundamental Principles and  
267 Rights at Work. Organizations in the sector can influence the employment practices of their investees  
268 [21]. When organizations in the sector place financial pressures on investees, this can lead to poorer  
269 quality jobs being provided by investees or force them to lay off workers.

270 Organizations have an essential role in upholding ethical standards related to good governance  
271 practices. Corruption and financial crime present significant barriers to investment in sustainable  
272 development, resulting in profound implications for economic development and employment  
273 opportunities in many countries. When public policy engagement is not carried out in a responsible,  
274 fair, and transparent manner, the interests of some organizations can have a disproportionate impact  
275 on policymaking.

276 Governments worldwide are implementing legislation to ensure organizations in the sector contribute  
277 to meaningful societal value, including national roadmaps and strategies for sustainable finance and  
278 regulatory adjustments [22]. Accordingly, stakeholder expectations and regulatory demands for  
279 transparent sustainability information from the sector are increasing. Providing transparent and  
280 comprehensive reports on sustainability matters for various stakeholders, including investors, entails  
281 disclosing key metrics and progress towards pre-established targets and commitments.

## 282 Sustainable Development Goals

283 The Sustainable Development Goals (SDGs), part of the 2030 Agenda for Sustainable Development  
284 adopted by the 193 United Nations (UN) member states, comprise the world's comprehensive plan of  
285 action to achieving sustainable development.

286 Since the SDGs and targets associated with them are integrated and indivisible, sector organizations  
287 in the capital markets sector have the potential to contribute to all SDGs by enhancing their positive  
288 impacts, or by preventing and mitigating their negative impacts on the economy, environment, and  
289 people.

290 The capital markets sector plays a fundamental role in achieving Goal 8: Decent Work and Economic  
291 Growth. By providing the necessary capital for organizations to expand and innovate, the sector helps  
292 create jobs and stimulate economic growth. The sector significantly contributes to national economies  
293 through tax payments which support economic stability and growth. Effective capital allocation is  
294 crucial as it directs financial resources towards investments that drive economic development. The

295 sector is also important in achieving Goal 9: Industry, Innovation and Infrastructure by providing the  
 296 necessary financing for organizations, sovereigns, and sub-sovereigns involved in infrastructure  
 297 development and technological innovation.

298 The sector is particularly relevant to achieving Goal 13: Climate Action. For example, organizations  
 299 support the transition to a low-carbon economy by channeling investments towards renewable energy  
 300 projects.

301 The sector is also linked to the impacts of corruption and financial crime which can affect the  
 302 achievement of Goal 16: Peace, Justice and Strong Institutions. Ensuring transparency and integrity  
 303 in financial transactions is essential for building strong institutions and promoting peaceful, inclusive  
 304 societies.

305 Table 2 presents connections between the likely material topics for the capital markets sector and the  
 306 SDGs. These linkages were identified based on an assessment of the impacts described in each  
 307 likely material topic and the targets associated with each SDG.

308 Table 2 is not a reporting tool but presents connections between the capital markets sector's significant  
 309 impacts and the goals of the 2030 Agenda for Sustainable Development.

310 **Table 2. Linkages between the likely material topics for the capital markets sector and the**  
 311 **SDGs**

Likely material topic	Corresponding SDGs
Topic [XX].1 Climate change	Goal 1: No Poverty
	Goal 7: Affordable and Clean Energy
	Goal 8: Decent Work and Economic Growth
	Goal 11: Sustainable Cities and Communities
	Goal 13: Climate Action
	Goal 17: Partnerships for the Goals
Topic [XX].2 Biodiversity	Goal 2: Zero Hunger
	Goal 6: Clean Water and Sanitation
	Goal 12: Responsible Consumption and Production
	Goal 14: Life Below Water
Topic [XX].3 Water and effluents	Goal 15: Life on Land
	Goal 3: Good Health and Well-being
	Goal 6: Clean Water and Sanitation
	Goal 12: Responsible Consumption and Production
	Goal 14: Life Below Water
Topic [XX].4 Waste	Goal 15: Life on Land
	Goal 3: Good Health and Well-being
	Goal 6: Clean Water and Sanitation
	Goal 11: Sustainable Cities and Communities
	Goal 12: Responsible Consumption and Production
Topic [XX].5 Financial health and inclusion	Goal 15: Life on Land
	Goal 1: No Poverty
	Goal 2: Zero Hunger

	Goal 3: Good Health and Well-being
	Goal 4: Quality education
	Goal 5: Gender Equality
	Goal 8: Decent Work and Economic Growth
	Goal 9: Industry, Innovation and Infrastructure
	Goal 10: Reduced Inequalities
Topic [XX].6 Client privacy and data security	Goal 16: Peace, Justice and Strong Institutions
Topic [XX].7 Marketing and labeling	Goal 12: Responsible Consumption and Production
	Goal 16: Peace, Justice and Strong Institutions
Topic [XX].8 Local communities and rights of Indigenous Peoples	Goal 1: No Poverty
	Goal 2: Zero Hunger
	Goal 5: Gender Equality
	Goal 11: Sustainable Cities and Communities
	Goal 14: Life Below Water
	Goal 15: Life on Land
Topic [XX].9 Conflict-affected and high-risk areas	Goal 8: Decent Work and Economic Growth
	Goal 16: Peace, Justice and Strong Institutions
Topic [XX].10 Non-discrimination and equal opportunity	Goal 5: Gender Equality
	Goal 8: Decent Work and Economic Growth
	Goal 10: Reduced Inequalities
	Goal 16: Peace, Justice and Strong Institutions
Topic [XX].11 Forced or compulsory labor	Goal 8: Decent Work and Economic Growth
	Goal 16: Peace, Justice and Strong Institutions
Topic [XX].12 Child labor	Goal 8: Decent Work and Economic Growth
	Goal 16: Peace, Justice and Strong Institutions
Topic [XX].13 Freedom of association and collective bargaining	Goal 8: Decent Work and Economic Growth
	Goal 16: Peace, Justice and Strong Institutions
Topic [XX].14 Occupational health and safety	Goal 3: Good Health and Well-being
	Goal 8: Decent Work and Economic Growth
Topic [XX].15 Employment	Goal 5: Gender Equality
	Goal 8: Decent Work and Economic Growth
	Goal 10: Reduced Inequalities
Topic [XX].16 Remuneration and working time	Goal 5: Gender Equality
	Goal 8: Decent Work and Economic Growth
	Goal 10: Reduced Inequalities
Topic [XX].17 Significant changes for workers	Goal 8: Decent Work and Economic Growth
	Goal 16: Peace, Justice and Strong Institutions

Topic [XX].18 Economic impacts	Goal 1: No Poverty
	Goal 2: Zero Hunger
	Goal 8: Decent Work and Economic Growth
	Goal 9: Industry, Innovation and Infrastructure
	Goal 10: Reduced Inequalities
	Goal 17: Partnerships for the Goals
Topic [XX].19 Prevention of corruption and financial crime	Goal 10: Reduced Inequalities
	Goal 16: Peace, Justice and Strong Institutions
	Goal 17: Partnerships for the Goals
Topic [XX].20 Anti-competitive behavior	Goal 10: Reduced Inequalities
	Goal 16: Peace, Justice and Strong Institutions
Topic [XX].21 Tax	Goal 1: No Poverty
	Goal 10: Reduced Inequalities
	Goal 17: Partnerships for the Goals
Topic [XX].22 Public policy	Goal 13: Climate Action
	Goal 16: Peace, Justice and Strong Institutions
	Goal 17: Partnerships for the Goals

## 312 2. Likely material topics

313 This section comprises the likely material topics for the capital markets sector. Each topic describes  
314 the sector's most significant impacts related to the topic and lists disclosures that have been identified  
315 as relevant for reporting on the topic by capital markets organizations. The organization is required to  
316 review each topic in this section and determine whether it is a material topic for the organization and  
317 then determine what information to report for its material topics.

### 318 Disclosures on incorporating sustainability in 319 investment

320 Through their investments, organizations in the capital markets sector can be involved with the  
321 impacts of their investees and their respective value chains on the economy, environment, and  
322 people, including human rights [26]. Given their many investees, spanning all sectors, managing  
323 these impacts and incorporating sustainability in investment is central to their contribution to  
324 sustainable development.

325  
326 Organizations in the capital markets sector can contribute to sustainable development through their  
327 investments by supporting efforts to prevent and mitigate negative impacts related to investees and  
328 enhance positive ones [29]. This includes impacts arising from the availability or lack of capital,  
329 resulting from structuring and pricing, including the impacts of investees on stakeholders along their  
330 respective value chains. Focusing too strongly on short-term returns can create conflict between the  
331 organization's investment activities and long-term sustainability [30].

332  
333 Asset owners' and managers' fiduciary duties and mandates increasingly include considerations of  
334 long-term implications of their investment decisions which may contribute to system-level impacts  
335 [31]. Incorporating sustainability issues into the investment process allows organizations in the sector  
336 to assess their investments more comprehensively.

337  
338 Common approaches for incorporating sustainability include integrating sustainability criteria into  
339 analysis, decision-making and portfolio construction. This ensures a focus on investees aligned with  
340 the organization's sustainability goals while screening out those that do not. Additionally,  
341 organizations in the capital markets sector can implement stewardship practices, such as direct and  
342 collective engagement, to promote sustainable business practices, encourage transparency, and  
343 drive positive outcomes among investees. When investees fail to prevent or mitigate their negative  
344 impacts, or when exclusion policies necessitate it, divestment might be employed as a further  
345 measure to uphold sustainability standards [26]. Investment strategies such as thematic and impact  
346 investing can also play a significant role in directing capital toward initiatives that generate positive  
347 environmental and social impacts.

348  
349 Through a due diligence approach on their current and potential investees, organizations in the capital  
350 markets sector can seek to address negative impacts of their investees [26], [27], [28].

351  
352 The additional sector disclosures complement Disclosures 3-1 and 3-3 in *GRI 3: Material Topics 2021*  
353 about how the organization identifies and manages actual and potential impacts across its activities,  
354 business relationships, and material topics, including enabling remediation of negative impacts.

355

#### **Box 1. Involvement of capital market organizations with negative impacts from investees**

Organizations in the capital markets sector should identify actual and potential negative impacts across all their activities and business relationships and assess how they may be involved with them [23], [26], [32], [24]. For negative impacts via investees, capital market organizations should consider business relationships with entities beyond the first tier [32], [33]. This means that the organization should consider the negative impacts from their investees and those in their investees' value chain [32], [33].

Capital market organizations can be involved with negative impacts via their investees when they contribute to those impacts or when their operations, products, or services are directly linked to them. The negative impacts are often directly linked to their operations, products, or services [26] [33], [34].

Direct links may occur when a capital markets organization has provided finance to an investee and the investee, in the context of using this finance, acts in a way that causes or contributes to a negative impact [33]. Organizations that hold minority shares can still be directly linked to negative impacts as a result of their business relationship with the entity causing or contributing to those negative impacts [35]. In such cases, capital market organizations should seek to prevent or mitigate the negative impact, such as raising concerns with other engaged investors [35]. Similarly, direct linkage can occur beyond the first tier of a business relationship [32] – for example, if the investee uses the organization’s financial products or services to fund another entity that causes negative impacts.

Contributions to negative impacts may occur when a capital markets organization wields significant managerial control over an investee [35].

The way a capital markets organization is involved with negative impacts via investees (i.e., whether it contributes to an impact or whether the impacts are directly linked to its investee) determines how it should address the impacts and whether it has a responsibility to provide for or cooperate in their remediation (see [section 2.3 in GRI 1: Foundation 2021](#)).

356

Additional sector disclosures	SECTOR STANDARD REF #
<p>Report whether the organization is an asset owner, asset manager, or another type of capital markets organization;</p> <p>Report whether assets are managed directly or indirectly through asset managers and, if asset managers are used, the criteria for selecting them;</p> <p>For asset managers, report:</p> <ul style="list-style-type: none"> <li>• the percentage breakdown of clients by institutional and retail clients;</li> <li>• whether the organization has wholesale channels.</li> </ul>	XX.0.1
<p>Report the total monetary value of assets under management at the end of the reporting period<sup>3</sup> and by percentage breakdown of relevant categories, including:</p> <ul style="list-style-type: none"> <li>• asset classes;</li> <li>• sectors, including the public sector, and the classification system used;</li> <li>• geographic locations;</li> <li>• low-, middle-, and high-income countries and their definition.</li> </ul> <p>Report the investment threshold the organization has determined in reporting the breakdown of assets under management.</p>	XX.0.2
<p>Report the following information about the organization’s definitions and commitments to incorporating sustainability in investments:</p> <ul style="list-style-type: none"> <li>• how impacts on the economy, environment, and people are considered in determining its strategy and business model;</li> <li>• its investment commitments and objectives on sustainability;</li> <li>• how sustainable investment is defined, including the jurisdiction-level taxonomies or labeling regimes it applies or is subject to, where available;</li> </ul>	XX.0.3

<sup>3</sup> Assets under management (AUM) refers to the total market value of all assets that an organization or financial institution manages on behalf of its clients or investors. This figure includes uncalled commitments, such as those in private equity or infrastructure, policyholders’ funds, off-balance-sheet assets, and the institution’s portion of joint venture (JV) assets where relevant. AUM is typically reported at market value, but if market value is unavailable, the latest net realizable value estimate may be used.



<ul style="list-style-type: none"> <li>• how incorporating sustainability in investments relates to fulfilling its fiduciary duties or equivalent obligations.</li> </ul>	
<p>Describe how the organization implements their definitions and commitments in its approach to incorporating sustainability in investments, including:</p> <ul style="list-style-type: none"> <li>• minimum standards and exclusion policies;</li> <li>• how it uses sustainability-related information in investment decisions, particularly in research, valuation, and portfolio construction through methods such as norms-based, negative, and positive screening;</li> <li>• how its investment objectives are linked to investment instruments with a specific sustainability focus (e.g., green bonds), with a percentage breakdown of assets under management and the criteria for specifying the instruments (e.g., ICMA guidelines);</li> <li>• thematic investment and impact investment products, with a percentage breakdown of assets under management.</li> </ul>	XX.0.4
<p>Report the governance bodies and roles responsible for overseeing and implementing the incorporation of sustainability in investments, including:</p> <ul style="list-style-type: none"> <li>• their competencies regarding sustainable development;</li> <li>• the number of <u>employees</u> with formal responsibilities on sustainability incorporation and the percentage of these compared to the organization's total number of employees;</li> <li>• the number of employees with formal responsibilities on investee stewardship and the percentage of these compared to the organization's total number of employees;</li> <li>• how their <u>remuneration</u> policies and performance reviews align with the organization's sustainable investment objectives and any differences in incentive structures and performance reviews across teams, particularly investment and stewardship teams.</li> </ul>	XX.0.5
<p>Describe the process to identify and assess actual and potential impacts from investees at the investment portfolio level, including:</p> <ul style="list-style-type: none"> <li>• the sectors, geographic locations, and any other factors that inform the process;</li> <li>• the material topics associated with these sectors, geographic locations, and other factors.</li> </ul>	XX.0.6
<p>Describe the process to identify and assess actual and potential impacts from investees at the individual investment level, including:</p> <ul style="list-style-type: none"> <li>• how the process differs by relevant categories, such as asset class and investment size;</li> <li>• frequencies at which the process is applied to relevant categories such as asset classes and investment sizes, and the rationale for these frequencies;</li> <li>• how the organization integrates the findings in the decision-making for new and existing investments;</li> <li>• how the organization assesses its involvement with actual negative impacts of its investees (see Box 1 in this Standard);</li> <li>• whether and how the process of identifying and assessing impacts differs by material topic.</li> </ul>	XX.0.7
<p>Describe the approach to investee stewardship, including:</p> <ul style="list-style-type: none"> <li>• the criteria for selecting investees for stewardship;</li> <li>• the practices used, including collective and direct engagement, and how they differ by relevant categories such as asset class and investment size;</li> <li>• how direct engagement with investees is defined;</li> <li>• the number of investees the organization directly engaged with for each material topic;</li> <li>• where actions taken to address negative impacts do not lead to desired changes, the escalation processes used, including adjusted investment and divestment;</li> <li>• whether and how the approach to investee stewardship differs by material topic;</li> </ul>	XX.0.8

<ul style="list-style-type: none"> <li>• how the organization monitors the stewardship approaches of externally managed portfolios for consistency with its approach to investee stewardship.</li> </ul>	
Describe the approach to proxy voting, including: <ul style="list-style-type: none"> <li>• the number of proxy votes cast in the last annual general meeting season;</li> <li>• the subject of proxy votes cast in the last annual general meeting season;</li> <li>• how the organization monitors the proxy voting approaches of externally managed portfolios for consistency with its approach to proxy voting.</li> </ul>	XX.0.9
Describe the approach to collecting data about impacts from investees to inform sustainability reporting, including: <ul style="list-style-type: none"> <li>• whether primary data from investees is collected and what it covers;</li> <li>• whether and how the organization uses data from third-party data providers;</li> <li>• how the organization addresses data gaps, including whether and how proxies and estimates are used.</li> </ul>	XX.0.10
Describe how engagement with relevant stakeholders and experts has informed approaches to sustainability incorporation in investment.	XX.0.11

357

Exposure draft for public comment

## 358 **Topic [XX].[1] Climate change**

359 **Organizations contribute to climate change and are simultaneously affected by it. This topic**  
360 **covers an organization’s approach to addressing climate change impacts and the transition to**  
361 **a low-carbon economy, including its contribution to mitigation, adaptation, and securing a just**  
362 **transition.**

363 Climate change mitigation and adaptation require actions that strengthen resilience and address  
364 vulnerability to impacts while aiming to limit global warming to 1.5°C above pre-industrial levels [37].  
365 Organizations in the capital markets sector may be involved with climate change impacts through their  
366 activities and as a result of their business relationships in all sectors of the economy.

367 Making financial flows consistent with a pathway towards low greenhouse gas (GHG) emissions and  
368 climate-resilient development, requires organizations in the capital markets sector to assess how their  
369 investments align with internationally agreed climate goals [38], as per the Paris Agreement and  
370 Intergovernmental Panel on Climate Change (IPCC). They should develop science-based transition  
371 plans for mitigation and adaptation accordingly. This includes integrating climate impacts, risks, and  
372 opportunities across their value chain into risk management systems and investment decisions [38].

373 The sector can support the transition to a low-carbon economy by providing products and services  
374 that enable investees to manage the phase-out of fossil fuel-powered energy. Organizations in the  
375 sector can contribute to this transition by redirecting financing away from new or expanded oil, coal,  
376 and gas, including liquefied natural gas (LNG) projects, which can lead to further emissions, and  
377 toward renewable and low-emitting energy sources. Organizations can also support mitigation efforts  
378 by using stewardship at different stages of the investment process. This will encourage investees in  
379 GHG emission-intensive sectors to adopt transition plans and align their GHG emissions reduction  
380 targets with the latest science and internationally agreed climate goals [40]. Apart from oil, gas, and  
381 coal, other GHG emissions-intensive sectors include agriculture, aluminum, cement, commercial and  
382 residential real estate, iron and steel, and transport [41]. In addition, organizations can directly and  
383 collectively advocate for policy and regulation that support a transition to a low-carbon economy and  
384 engage with market actors, such as regulators, to ensure their climate assessments are based on  
385 robust methodologies aligned with the Paris Agreement [41].

386 Organizations in the sector can contribute to climate change adaptation and resilience by increasing  
387 financing for climate solutions. This can include climate-resilient infrastructure, cooling systems, and  
388 activities safeguarding the natural environment, such as conservation and restoration, particularly in  
389 geographic locations vulnerable to climate impacts (see [topic XX.2 Biodiversity](#)). This implies  
390 assessing the impacts of sectors and activities exposed to climate change’s current and future  
391 physical effects that are more likely to harm people and the environment [38] and identifying those  
392 that require adaptation strategies, especially in vulnerable geographic locations.

393 Organizations can also support the transition to a low-carbon economy by incorporating just transition  
394 principles in their transition and adaptation plans, which can include portfolio climate risk management  
395 and investment strategies [42]. This involves developing policies and criteria for assessing investees’  
396 transition plans, which can result in impacts on workers, local communities, and Indigenous Peoples.  
397 Impacts can include the development of new skill sets for workers or an increase in the severity and  
398 likelihood of adverse human rights impacts [43].

399 Organizations in the sector can account for their GHG emissions, including Scope 1, Scope 2, and  
400 Scope 3, by each of the 15 categories. The primary focus will be on Scope 3 category 15 emissions,  
401 as most of the sector’s GHG footprint comes from financing GHG emission-intensive sectors.  
402 Organizations are expected to set short-, medium-, and long-term emissions reduction targets, and  
403 track and report their progress against those targets [42].

404 **Reporting on climate change**

405 If the organization has determined climate change to be a material topic, this sub-section lists the  
 406 disclosures identified as relevant for reporting on the topic by the capital markets sector.

STANDARD	DISCLOSURE	SECTOR STANDARD REF #
<b>Management of the topic</b>		
<b>GRI 3: Material Topics 2021</b>	<p><a href="#">Disclosure 3-3 Management of material topics</a></p> <p><i>Additional sector recommendations</i></p> <ul style="list-style-type: none"> <li>• Describe the impacts of climate change mitigation and adaptation activities associated with the investment portfolio, including impacts on:                             <ul style="list-style-type: none"> <li>- local communities, <u>vulnerable groups</u>, workers, and Indigenous Peoples;</li> <li>- biodiversity.</li> </ul> </li> <li>• For investee stewardship related to climate change, report:                             <ul style="list-style-type: none"> <li>- agreed-upon targets related to investees' performance, along with metrics for evaluating progress;</li> <li>- examples of outcomes of investee stewardship.</li> </ul> </li> </ul>	XX.1.1
<b>Topic Standard disclosures</b>		
<b>GRI CC: Climate Change (exposure draft)</b>	<p><a href="#">Disclosure CC-1 Transition plan for climate change mitigation</a></p> <p><i>Additional sector recommendations</i></p> <ul style="list-style-type: none"> <li>• When reporting transition plan-related policies, include:                             <ul style="list-style-type: none"> <li>- policies for investing in investees that:                                     <ul style="list-style-type: none"> <li>- undertake new oil, gas, and coal projects;</li> <li>- expand existing oil, gas, and coal projects;</li> </ul> </li> <li>- policies for managing the early retirement of oil-, gas-, and coal-related assets;</li> <li>- policies for investing in other GHG emission-intensive sectors, with a breakdown by sector;</li> <li>- any asset classes and business relationships excluded from the transition plan-related policies;</li> <li>- the rationale for any exclusions.</li> </ul> </li> <li>• Describe the policies to evaluate the transition plans of investees, including:                             <ul style="list-style-type: none"> <li>- which sectors the policy applies to;</li> <li>- the criteria to assess the quality of the transition plan in line with the latest science and internationally agreed climate goals;</li> <li>- the criteria to assess just transition considerations in the transition plan.</li> </ul> </li> </ul>	XX.1.2
<b>GRI CC: Climate Change (exposure draft)</b>	<p><a href="#">Disclosure CC-2 Climate change adaptation plan</a></p> <p><i>Additional sector recommendations</i></p> <ul style="list-style-type: none"> <li>• When describing the climate change adaptation plan, include:                             <ul style="list-style-type: none"> <li>- how the organization assesses the impacts of investments associated with climate change-related physical risks, including impacts on:</li> </ul> </li> </ul>	XX.1.3

	<ul style="list-style-type: none"> <li>- workers, local communities, and Indigenous Peoples;</li> <li>- biodiversity.</li> <li>- policies for investing in adaptation and resilience, including: <ul style="list-style-type: none"> <li>- investments aimed at preventing the physical risks of climate change;</li> <li>- investments aimed at remediating and recovering from the physical risks of climate change.</li> </ul> </li> </ul>	
<b>GRI CC: Climate Change (Exposure draft)</b>	<p><a href="#">Disclosure CC-4 GHG emissions reduction target setting and progress</a></p> <p><i>Additional sector recommendations</i></p> <ul style="list-style-type: none"> <li>• When reporting the short-, medium-, and long-term GHG emissions reduction target setting and progress for Scope 3, category 15, include: <ul style="list-style-type: none"> <li>- targets that apply to the oil, gas, and coal sectors;</li> <li>- targets that apply to other GHG emissions-intensive sectors;</li> <li>- actions or planned actions to increase the scope of targets to cover all sectors;</li> <li>- the monetary value of the relevant investment portfolio at the end of the <u>reporting period</u> that the targets apply to, reported as: <ul style="list-style-type: none"> <li>- an absolute amount;</li> <li>- a percentage of the total value of the portfolio, reported separately;</li> <li>- a breakdown by sector;</li> </ul> </li> <li>- any products, services, or business relationships excluded from the targets;</li> <li>- the rationale for any exclusions;</li> </ul> </li> <li>• When reporting progress towards Scope 3, category 15, targets, include: <ul style="list-style-type: none"> <li>- the progress towards targets related to the oil, gas, and coal sectors;</li> <li>- the progress towards targets related to other GHG emissions-intensive sectors;</li> <li>- how progress resulted in actual economic decarbonization or was caused by portfolio changes.</li> </ul> </li> <li>• Report whether an independent third party validated Scope 3 category 15 GHG emission reduction targets and related emissions reduction progress.</li> </ul>	XX.1.4
<b>GRI CC: Climate Change (exposure draft)</b>	<a href="#">Disclosure GH-1 Scope 1 GHG emissions</a>	XX.1.5
<b>GRI CC: Climate Change (exposure draft)</b>	<a href="#">Disclosure GH-2 Scope 2 GHG emissions</a>	XX.1.6
<b>GRI CC: Climate Change (exposure draft)</b>	<p><a href="#">Disclosure GH-3 Scope 3 GHG emissions</a></p> <p><i>Additional sector recommendations</i></p> <ul style="list-style-type: none"> <li>• When reporting Scope 3 emissions, category 15: <ul style="list-style-type: none"> <li>- include financed emissions, with a breakdown by asset class and sector;</li> </ul> </li> </ul>	XX.1.7

	<ul style="list-style-type: none"> <li>- include facilitated emissions, with a breakdown by asset class and sector;</li> <li>- report the monetary value at the end of the reporting period of the investment portfolios covered by the calculations reported as: <ul style="list-style-type: none"> <li>- an absolute amount;</li> <li>- a percentage of the total value of each portfolio</li> </ul> </li> <li>- explain any limitations of the data collected about investees and any plans to improve the accuracy of the data.</li> </ul>	
<b>GRI CC: Climate Change (Exposure draft)</b>	<p><a href="#">Disclosure GH-4 GHG emissions intensity</a></p> <p>Additional sector recommendations:</p> <ul style="list-style-type: none"> <li>• Report emissions intensity ratio(s) for Scope 3, category 15, and the metric (denominator) used.</li> </ul>	XX.1.8
<b>GRI CC: Climate Change (Exposure draft)</b>	<p><a href="#">Disclosure CC-6 Carbon credits</a></p>	XX.1.9
<b>Additional sector disclosures</b>		
	<p>Report the monetary value at the end of the reporting period of the investment portfolio, including the percentage of the total value of the portfolio allocated to investees that:</p> <ul style="list-style-type: none"> <li>• are active in the oil, coal, and gas sectors, with a breakdown by type;</li> <li>• received investment for new and expansion projects related to oil, coal, and gas during the reporting period, with a breakdown by geographic location;</li> <li>• are active in other GHG emissions-intensive sectors, with a breakdown by sector.</li> </ul>	XX.1.10
	<p>Report the monetary value at the end of the reporting period of the investment portfolios with externally verified targets and transition plans that are in line with the latest science and internationally agreed climate goals, including:</p> <ul style="list-style-type: none"> <li>• the absolute amount;</li> <li>• the percentage of the total value of each portfolio;</li> <li>• a breakdown by sector.</li> </ul> <p>Report the monetary value and percentage of the investment portfolio at the end of the reporting period allocated to investees that have included just transition considerations in their transition plans, including:</p> <ul style="list-style-type: none"> <li>• the absolute amount;</li> <li>• the percentage of the total value of each portfolio.</li> </ul> <p>Describe any limitations of the data collected about investees regarding their transition plans and any plans to improve data accuracy.</p>	XX.1.11
	<p>Report the monetary value at the end of the reporting period of the investment portfolio, including the percentage of the total value of the portfolio allocated to investees that undertake:</p> <ul style="list-style-type: none"> <li>• renewable energy projects, with a breakdown by geographic location;</li> <li>• other climate mitigation activities, with a breakdown by sector and geographic location;</li> <li>• climate adaptation activities, with a breakdown by sector and geographic location.</li> </ul> <p>Report the organization's taxonomies and definitions to classify climate mitigation and adaptation activities.</p> <p>Report any targets the organization has set for improving investing in climate mitigation and adaptation activities.</p>	XX.1.12

407 **References and resources**

408 *GRI CC: Climate Change (exposure draft)* lists authoritative intergovernmental instruments and  
409 additional references relevant to reporting on this topic.

410 The additional authoritative instruments and references used in developing this topic, as well as  
411 resources that may be helpful for reporting on climate change by the capital markets sector, are listed  
412 in the [Bibliography](#).

Exposure draft for public comment

## 413 **Topic [XX].[2] Biodiversity**

414 **Biodiversity is the variability among living organisms. It includes diversity within species,**  
415 **between species, and of ecosystems. Biodiversity has intrinsic value and is vital to human**  
416 **health, food security, economic prosperity, and mitigation of climate change and adaptation to**  
417 **its impacts. This topic covers impacts on biodiversity, including genetic diversity, animal and**  
418 **plant species, and natural ecosystems.**

419 Commercial activities have significantly altered nature worldwide, leading to unprecedented declines  
420 in biodiversity and ecosystem services and posing systemic economic risks [50]. Organizations in the  
421 capital markets sector may be involved with biodiversity impacts mainly as a result of their business  
422 relationships in all sectors of the economy.

423 Organizations are expected to align their policies, strategies, and decision-making processes,  
424 including investing, with global biodiversity goals and targets [51], [52]. The Kunming-Montreal Global  
425 Biodiversity Framework outlines a pathway to achieve the global vision of a world 'living in harmony  
426 with nature' by 2050. The framework includes goals for 2050 and targets for 2030 and urges  
427 organizations across various economic sectors, including financial institutions, to help halt and reverse  
428 biodiversity loss. It aims to put nature on a path to recovery by conserving, restoring, and sustainably  
429 using biodiversity, and by ensuring the fair and equitable sharing of benefits from using genetic  
430 resources. This requires organizations to adopt new business models, enhance reporting  
431 transparency, redirect financing away from harmful activities and scale up those with positive impacts.  
432 This can help ensure enough investment to close the biodiversity finance gap by meeting the  
433 necessary costs of conservation and restoration of ecosystems worldwide [51].

434 The Kunming-Montreal Global Biodiversity Framework also sets out expectations for organizations to  
435 identify, monitor, and assess biodiversity-related impacts across their activities and business  
436 relationships. These impacts can be related to investees whose activities and suppliers' activities lead  
437 or could lead to one or more of the direct drivers of biodiversity loss (see [Box 1 in GRI 101:](#)  
438 [Biodiversity 2024](#)) or whose sites are located in or near ecologically sensitive areas (see [Table 1 in](#)  
439 [GRI 101: Biodiversity 2024](#)) [53]. To identify investees with the most significant impacts, organizations  
440 can identify geographical locations and sectors where impacts on biodiversity are most likely to be  
441 present and significant. Organizations may not have the information available to identify the most  
442 significant biodiversity impacts across their investment portfolio. However, organizations are  
443 encouraged to work with data providers and tools, such as remote sensing, to gather the needed data.  
444 Organizations in the sector are also expected to report on the biodiversity impacts of their own  
445 operations if deemed material [54].

446 By identifying where impacts on biodiversity occur, organizations can also address the nexus between  
447 biodiversity and other impacts, such as how water cycles may be disrupted (see [topic XX.3 Water and](#)  
448 [effluents](#)). Similarly, biodiversity plays a crucial role in climate change mitigation and adaptation by  
449 enhancing carbon sequestration and providing species with the capacity to respond to environmental  
450 changes (see [topic XX.1 Climate change](#)). In addition, impacts on biodiversity may also have  
451 consequences for Indigenous Peoples' territories and local communities' resources (see [topic XX.8](#)  
452 [Local communities and rights of Indigenous Peoples](#)).

453 Organizations in the capital markets sector can contribute to reversing biodiversity loss by increasing  
454 financing for nature-based solutions that protect, sustainably manage and restore biodiversity and its  
455 associated ecosystem services [55], [56]. When organizations are involved with negative biodiversity  
456 impacts as a result of their business relationships, they can engage investees to address them,  
457 including through investee stewardship activities. Organizations in the capital markets sector can  
458 further enhance their impact by collaborating with other stakeholders to align financing activities with  
459 global biodiversity goals and targets, such as industry initiatives, regulators, or policymakers [53].



460 **Reporting on biodiversity**

461 If the organization has determined biodiversity to be a material topic, this sub-section lists the  
 462 disclosures identified as relevant for reporting on the topic by the capital markets sector.

STANDARD	DISCLOSURE	SECTOR STANDARD REF #
<b>Management of the topic</b>		
<b>GRI 3: Material Topics 2021</b>	<p><a href="#">Disclosure 3-3 Management of material topics</a></p> <p><i>Additional sector recommendations</i></p> <ul style="list-style-type: none"> <li>Describe how the organization incorporates biodiversity considerations in its products and services.</li> <li>Report the indicators and data used to measure the impacts of investees on biodiversity.</li> <li>For investee stewardship related to biodiversity, report:               <ul style="list-style-type: none"> <li>agreed-upon targets related to investees' performance, along with metrics for evaluating progress;</li> <li>examples of outcomes of investee stewardship.</li> </ul> </li> </ul>	XX.2.1
<b>Topic Standard disclosures</b>		
<b>GRI 101: Biodiversity 2024</b>	<p><a href="#">Disclosure 101-1 Policies to halt and reverse biodiversity loss</a></p> <p><i>Additional sector recommendations</i></p> <p>When reporting on the policies to halt and reverse biodiversity loss, include:</p> <ul style="list-style-type: none"> <li>the policies for investing in organizations that have or could have an impact on biodiversity, with a breakdown by sector;</li> <li>the policies for investing in organizations that have sites in or near ecologically sensitive areas, with a breakdown by sector;</li> <li>the policies for investing in organizations that conserve and restore biodiversity, with a breakdown by sector;</li> <li>the policies for investing in organizations that use genetic resources to ensure they provide access to and share the benefits fairly and equitably with Indigenous Peoples and local communities;</li> <li>the asset classes, business relationships, and geographic locations excluded from these policies, and describe the rationale for any exclusion.</li> </ul>	XX.2.2
<b>Additional sector disclosures</b>		
<p>Describe how the organization identifies investees with the most significant actual and potential impacts on biodiversity, including a description of:</p> <ul style="list-style-type: none"> <li>the sectors and the extent of their <u>supply chain</u> covered;</li> <li>the taxonomies and definitions used to select sectors for the assessment;</li> <li>the methods used and the assumptions made to identify investees with the most significant impacts on biodiversity, including the data sources used;</li> <li>the organization's plans to improve or expand the scope of the assessment over the short-, medium- and long-term;</li> </ul>		XX.2.3

<ul style="list-style-type: none"> <li>the asset classes excluded from the assessment and the rationale for excluding them.</li> </ul> <p>Describe any limitations of the data collected about investees and from other sources to identify the ones with the most significant actual and potential impacts on biodiversity.</p> <p>Report the monetary value at the end of the <u>reporting period</u> of the investment portfolio included in the assessment, including:</p> <ul style="list-style-type: none"> <li>the absolute amount;</li> <li>the percentage of the total value of the portfolio;</li> <li>a breakdown by sector.</li> </ul>	
<p>Report the monetary value at the end of the reporting period of the investment portfolio allocated to investees that have identified sites with the most significant impacts on biodiversity, including:</p> <ul style="list-style-type: none"> <li>the absolute amount;</li> <li>the percentage of the total value of the portfolio;</li> <li>a breakdown by sector.</li> </ul>	XX.2.4
<p>Report the monetary value at the end of the reporting period of the investment portfolio allocated to investees that have set targets to minimize negative impacts on biodiversity, including:</p> <ul style="list-style-type: none"> <li>the absolute amount;</li> <li>the percentage of the total value of the portfolio;</li> <li>a breakdown by sector.</li> </ul>	XX.2.5
<p>Report the monetary value at the end of the reporting period of the investment portfolio, including the percentage of the total value of the portfolio, allocated to investees that:</p> <ul style="list-style-type: none"> <li>restore or rehabilitate degraded ecosystems;</li> <li>conserve ecosystems;</li> <li>undertake climate change mitigation or adaptation; activities that contribute to the protection of biodiversity.</li> </ul> <p>Report the taxonomies and definitions that the organization uses to classify restoration and conservation activities, as well as other activities that aim to halt and reverse biodiversity loss.</p> <p>Report the goals and targets for investing in organizations that conserve, restore, and protect biodiversity loss.</p>	XX.2.6

463 **References and resources**

464 [GRI 101: Biodiversity 2024](#) lists authoritative intergovernmental instruments and additional references  
465 relevant to reporting on this topic.

466 The additional authoritative instruments and references used in developing this topic, as well as  
467 resources that may be helpful for reporting on biodiversity by the capital markets sector, are listed in  
468 the [Bibliography](#).

## 469 **Topic [XX].[3] Water and effluents**

470 **Recognized as a human right, access to fresh water is essential for human life and well-being.**  
471 **The amount of water withdrawn and consumed by an organization and the quality of its**  
472 **discharges can have impacts on ecosystems and people. This topic covers impacts related to**  
473 **the withdrawal and consumption of water and the quality of water discharged.**

474 In 2023, approximately half of the world's population faced severe water scarcity as a consequence of  
475 climate change alongside other compounding factors such as land use change, pollution [65], and the  
476 privatization of water resources. Organizations in the capital markets sector may be involved with  
477 water-related impacts mainly as a result of their business relationships in all sectors of the economy.

478 Impacts can be more significant when investment portfolios focus on organizations in water-intensive  
479 sectors and areas with water stress [66]. Organizations are also exposed to impacts through  
480 sovereign and sub-sovereign entities, which form a substantial part of new issuances and debt stocks  
481 [67]. Organizations in the sector are also key investors in municipalities and infrastructure projects  
482 where they can influence how investments deliver positive impacts such as reducing water loss,  
483 improving effluent discharge quality, and supporting desalination projects in areas with water stress.

484 Organizations can address water-related impacts by setting sustainability goals, making informed  
485 portfolio allocation decisions, and influencing investees to prioritize water-related considerations [68].  
486 By aligning their investment activities with water stewardship, organizations can better assess and  
487 manage water-related impacts via investees. Water stress caused by unsustainable water withdrawal  
488 and pollution has negative impacts on economic sectors, local communities, and biodiversity (see  
489 [topic XX.2 Biodiversity](#)). In local communities, impacts can lead to concerns over food security,  
490 disruptions to essential ecosystems crucial for livelihoods, and an increased risk of water-related  
491 conflicts (see [topic XX.8 Local communities and rights of Indigenous Peoples](#)).

492 Incorporating water considerations into their investment strategies allows organizations to drive  
493 positive change toward sustainable water use and mitigate negative impacts associated with their  
494 investees' water consumption. Capital markets organizations can use their leverage to encourage  
495 their investees to implement water stewardship practices. This includes engaging with investees to  
496 address the consequences of water-related activities and promote reduced water withdrawal,  
497 consumption, and improve effluent discharge quality, thereby fostering sustainable water practices  
498 across various sectors [66].

499 **Reporting on water and effluents**

500 If the organization has determined water and effluents to be a material topic, this sub-section lists the  
 501 disclosures identified as relevant for reporting on the topic by the capital markets sector.

STANDARD	DISCLOSURE	SECTOR STANDARD REF #
<b>Management of the topic</b>		
<b>GRI 3: Material Topics 2021</b>	<p><a href="#">Disclosure 3-3 Management of material topics</a></p> <p><i>Additional sector recommendations</i></p> <ul style="list-style-type: none"> <li>For investee stewardship related to water and effluents, report:               <ul style="list-style-type: none"> <li>agreed-upon targets related to investees' performance, along with metrics for evaluating progress;</li> <li>examples of outcomes of investee stewardship.</li> </ul> </li> </ul>	XX.3.1
<b>Topic Standard disclosures</b>		
<b>GRI 303: Water and Effluents 2018</b>	<a href="#">Disclosure 303-1 Interactions with water as a shared resource</a>	XX.3.2
<b>Additional sector disclosures</b>		
	Report the average amount of water consumed by the investees (m <sup>3</sup> ) per million (currency) of revenue of investees. <sup>4</sup>	XX.3.3
	Report the percentage of investees with sites in areas of high water stress without a water management policy. <sup>5</sup>	XX.3.4

502 **References and resources**

503 [GRI 303: Water and Effluents 2018](#) lists authoritative intergovernmental instruments and additional  
 504 references relevant to reporting on this topic.

505 The additional authoritative instruments and references used in developing this topic, as well as  
 506 resources that may be helpful for reporting on water and effluents by the capital markets sector, are  
 507 listed in the [Bibliography](#).

<sup>4</sup> This disclosure is aligned with the Principle Adverse Indicators included in the EU's Sustainable Finance Disclosures Regulation (SFDR) [Regulation - 2019/2088 - EN - sfdr - EUR-Lex \(europa.eu\)](#).

<sup>5</sup> This disclosure is aligned with the Principle Adverse Indicators included in the EU's Sustainable Finance Disclosures Regulation (SFDR) [Regulation - 2019/2088 - EN - sfdr - EUR-Lex \(europa.eu\)](#).

## 508 **Topic [XX].[4] Waste**

509 **Waste refers to anything that a holder discards, intends to discard, or is required to discard.**  
510 **When inadequately managed, waste can have negative impacts on the environment and**  
511 **human health, which can extend beyond the locations where waste is generated and**  
512 **discarded. This topic covers the impacts of waste and the management of waste.**

513 By 2050, annual global waste is projected to reach 3.4 billion tons. Currently, over 30% of solid waste  
514 streams fail to meet environmentally safe treatment standards [72]. Organizations in the capital  
515 markets sector may be involved with waste-related impacts mainly as a result of their business  
516 relationships in all sectors of the economy.

517 Organizations may be involved in impacts related to waste by investing in organizations with  
518 unsustainably managed waste that may contaminate the environment and have negative impacts on  
519 ecosystems as well as on human health. Waste contributes to pollution by releasing harmful  
520 substances into the environment, similar to how the discharge of effluents and other pollutants  
521 degrades water quality (see [topic XX.3 Water and effluents](#)). Other negative impacts associated with  
522 waste can include greenhouse gas emissions and biodiversity loss (see [topic XX.1 Climate change](#)  
523 [and XX.2 Biodiversity](#)). Incorporating waste management and circularity considerations into  
524 investment analysis, decision-making, and engagement can lead to better waste management  
525 practices, increase resource efficiency and prolong product use.

526 Understanding the waste-related impacts of their investees empowers organizations to gauge and  
527 increase the overall circularity of their investment portfolio [73]. The capital markets sector can  
528 identify, avoid, and manage potential waste-related impacts via investees by focusing on waste  
529 prevention and adopting circularity measures. This includes conducting investee screening and due  
530 diligence processes to identify high-waste sectors, especially those with high volumes of hazardous  
531 waste or low recycling rates [74]. Organizations can further assess negative waste-related impacts by  
532 evaluating investees' policies and plans to manage waste and their mitigation strategies. In addition,  
533 organizations can leverage their influence by engaging with investees to encourage them to  
534 sustainably manage waste and adopt circular economy principles, such as those aimed at reducing  
535 plastic waste [75].

536 Circular economy strategies can also drive more sustainable investment [76]. This shift can be  
537 supported by dedicated investment products and services designed to scale up innovations. Capital  
538 market products, such as waste reduction bonds, can also generate positive impacts since bond  
539 proceeds fund new waste reduction projects or refinance existing ones that meet eligibility criteria  
540 [77].

541 **Reporting on waste**

542 If the organization has determined waste to be a material topic, this sub-section lists the disclosures  
 543 identified as relevant for reporting on the topic by the capital markets sector.

STANDARD	DISCLOSURE	SECTOR STANDARD REF #
<b>Management of the topic</b>		
<b>GRI 3: Material Topics 2021</b>	<a href="#">Disclosure 3-3 Management of material topics</a> <i>Additional sector recommendations</i> <ul style="list-style-type: none"> <li>For investee stewardship related to waste, report:               <ul style="list-style-type: none"> <li>agreed-upon targets related to investees' performance, along with metrics for evaluating progress;</li> <li>examples of outcomes of investee stewardship.</li> </ul> </li> </ul>	XX.4.1
<b>Topic Standard disclosures</b>		
<b>GRI 306: Waste 2020</b>	<a href="#">Disclosure 306-2 Management of significant waste-related impacts</a>	XX.4.2
<b>Additional sector disclosures</b>		
Report the tons of hazardous waste and radioactive waste generated by investees per million (currency) invested, expressed as a weighted average. <sup>6</sup>		XX.4.3

544 **References and resources**

545 [GRI 306: Waste 2020](#) lists authoritative intergovernmental instruments and additional references  
 546 relevant to reporting on this topic.

547 The additional authoritative instruments and references used in developing this topic, as well as  
 548 resources that may be helpful for reporting on waste by the capital markets sector, are listed in the  
 549 [Bibliography](#).

<sup>6</sup> This disclosure is aligned with the Principle Adverse Indicators included in the EU's Sustainable Finance Disclosures Regulation (SFDR) [Regulation - 2019/2088 - EN - sfdr - EUR-Lex \(europa.eu\)](#).

550

## Topic [XX].[5] Financial health and inclusion

551 **Financial health is the ability of an individual, household, or organization to effectively handle**  
552 **current financial commitments and risks while enabling the achievement of future financial**  
553 **goals. Financial inclusion guarantees affordable and effective access to all individuals and**  
554 **organizations to use suitable financial products and services. This topic covers an**  
555 **organization’s approach to financial health and inclusion.**

556 Organizations in the capital markets sector may be involved with impacts related to financial health  
557 and inclusion through their activities or as a result of their business relationships.

558 Organizations can support financial health and inclusion by providing individuals and organizations  
559 with access to affordable and suitable products and services, particularly for vulnerable or  
560 underserved groups, such as low-income households or remote communities (see [topic XX.8 Local](#)  
561 [communities and rights of Indigenous Peoples](#)). Access to understandable and affordable investment  
562 and pension products is crucial for income generation and long-term income planning of clients,  
563 including beneficiaries of pension plans [84]. This supports sustainable development by reducing  
564 poverty, addressing inequalities, and driving positive economic and societal outcomes.

565 Capital markets, particularly private equity and debt can also have impacts on financial health and  
566 inclusion through dedicated funding for micro-, small, and medium-sized enterprises (MSMEs), which  
567 supports broader economic development. Institutional investors can play an additional role in  
568 supporting MSMEs by investing in strategies that target these groups and ensuring a steady flow of  
569 funds to these organizations. Organizations in the sector can also allocate capital to support the  
570 economic viability of underserved and disadvantaged groups, including investing in microfinance or  
571 microinsurance.

572 Positive impacts on financial health and inclusion require policies, procedures, products, and services  
573 emphasizing client protection and supporting their best interests, including appropriate dispute and  
574 recourse mechanisms. Organizations are expected to provide fair products and services without  
575 discrimination or bias and clearly communicate pricing, terms, and conditions [85]. Fairness should be  
576 a priority throughout the client journey, including product design, marketing, and selling (see [topic](#)  
577 [XX.10 Non-discrimination and equal opportunity](#), and [XX.7 Marketing and labeling](#)).

578 Financial education can strengthen clients’ financial literacy and behaviors, particularly for first-time  
579 users. It enhances their access to suitable products and improves their understanding of relevant  
580 terms, conditions, and risks. Organizations in the capital markets sector can support financial literacy  
581 by targeting programs to vulnerable and underserved groups or those excluded from the formal  
582 financial system. Additionally, organizations in the capital markets sector can invest in innovative  
583 technologies that improve organizations’ and individuals’ access to financial products and services.  
584 Digital financial services can improve access to financial services [86]. However, ensuring that all  
585 clients benefit from these services requires education to improve digital literacy, as some groups may  
586 risk exclusion due to limited access to or understanding of digital tools.

587 Distribution and sales channels, including workers, brokers, and third-party platforms, are important in  
588 driving positive impacts on financial health and inclusion, particularly when recommending products to  
589 clients or processing their complaints. These channels can support positive impacts by considering  
590 clients’ financial health when providing advice and selling products. Organizations in the sector can  
591 take actions targeted at distributors, such as implementing incentive and training systems, that  
592 encourage them to promote customers’ financial health and inclusion.

593 **Reporting on financial health and inclusion**

594 If the organization has determined financial health and inclusion to be a material topic, this sub-  
 595 section lists the disclosures identified as relevant for reporting on the topic by the capital markets  
 596 sector.

STANDARD	DISCLOSURE	SECTOR STANDARD REF #
<b>Management of the topic</b>		
<b>GRI 3: Material Topics 2021</b>	<p data-bbox="443 551 991 577"><u>Disclosure 3-3 Management of material topics</u></p> <p data-bbox="443 595 863 622"><i>Additional sector recommendations</i></p> <ul data-bbox="491 629 1166 1211" style="list-style-type: none"> <li>• Describe the dispute and recourse mechanisms for complaints relating to financial health and inclusion.</li> <li>• Describe the approach to assessing the financial health of the organization’s clients and investees, including the use of financial health-related metrics or scores.</li> <li>• Describe the actions targeted at workers, distributors, and third-party platforms aimed at promoting clients’ and investees’ financial health and inclusion.</li> <li>• Describe whether and how the organization is involved in initiatives and partnerships aimed at enhancing financial health and inclusion.</li> <li>• For investee stewardship related to financial health and inclusion, report:                             <ul data-bbox="544 1093 1150 1211" style="list-style-type: none"> <li>- agreed-upon targets related to investees’ performance, along with metrics for evaluating progress;</li> <li>- examples of outcomes of investee stewardship.</li> </ul> </li> </ul>	XX.5.1
<b>Additional sector disclosures</b>		
Report the client and investee groups the organization intends to reach through its financial health and inclusion policies (hereafter referred to as identified client and investee groups) and the process used to determine these groups.		XX.5.2
Describe how the organization addresses the needs of the identified client and investee groups, including through:	<ul data-bbox="252 1458 1166 1581" style="list-style-type: none"> <li>• product and service design, including how it incorporates actions to improve access to products and services;</li> <li>• financial education and literacy initiatives, including reporting the number of participants.</li> </ul>	XX.5.3
Report the total number of complaints related to financial health and inclusion, including:	<ul data-bbox="252 1648 1166 1895" style="list-style-type: none"> <li>• a breakdown of <u>substantiated</u> and non-substantiated complaints;</li> <li>• a breakdown by type of complaint;</li> <li>• a breakdown by type of complainant, including clients (e.g., retail clients), non-clients (e.g., individuals that have been denied access to a product or service), and investees;</li> <li>• most prevalent issues;</li> <li>• any observed trends per complaint type, comparing data from the current period to the previous <u>reporting period</u>.</li> </ul>	XX.5.4
Report the percentage of assets under management allocated to MSMEs, including the organization’s definition of MSMEs used.		XX.5.5



597 **References and resources**

598 The authoritative instruments and references used in developing this topic, as well as resources that  
599 may be helpful for reporting on financial health and inclusion by the capital markets sector, are listed  
600 in the [Bibliography](#).

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## 601 **Topic [XX].[6] Client privacy and data security**

602 **Client privacy and data security** privacy refers to a client’s right to the protection of their data  
603 **and personal information from losses, data breaches, misuse, or use for purposes other than**  
604 **initially intended. This topic covers the impacts on client privacy and the loss of client data.**

605 Organizations in the capital markets sector may be involved with impacts related to client privacy and  
606 data security through their activities or as a result of business relationships.

607 Digital financial services have increased the datasets available to organizations, allowing them to offer  
608 tailored products and services for specific client groups, which can enhance financial health (see [topic](#)  
609 [XX.5 Financial health and inclusion](#)). Conversely, with detailed client information, organizations can  
610 encourage clients to purchase tailored products that are not necessarily in their best interests, which  
611 can compromise financial health. The availability of large amounts of personal information can  
612 threaten client privacy through potential misuse or loss via scams or cyberattacks (see [topic XX.19](#)  
613 [Prevention of corruption and financial crime](#)). Organizations in the sector are reliant on solid  
614 cybersecurity measures to prevent the exposure or misuse of confidential client information like  
615 financial details and personal identifiers.

616 Open finance allows clients to access a wide range of products and services through digital systems  
617 by efficiently sharing client data between various providers [95]. However, due to its reliance on data  
618 sharing, open finance raises concerns about data protection, for instance, where the quality of  
619 providers’ security systems and governance may not be consistent, or where providers operate under  
620 different regulatory regimes in which client protection laws do not align.

621 Clients may also not understand the value of their data or how organizations utilize it. They may,  
622 therefore, consent to data sharing without fully understanding the potential negative impacts [96].  
623 Client data, used in conjunction with other big data sets sourced externally, for example, from social  
624 media for instance, can feed artificial intelligence (AI) and machine learning applications that, while  
625 having the objective to avoid biases from human interactions, can instead exacerbate them. This can  
626 result in discrimination or unfair treatment of specific client groups based on their behaviors or  
627 preferences [97] (see [topic XX.10 Non-discrimination and equal opportunity](#)).

628 Organizations in the sector can also have impacts on client privacy through their investments,  
629 particularly those managing large amounts of data that can be hacked or used to identify and exploit  
630 client behavioral biases. This creates a systematic risk that technology firms can use client data in a  
631 manner that destabilizes societies and produces conflict.

632 Organizations can strengthen client privacy through robust data management systems and practices  
633 to ensure sensitive data is not inappropriately used or shared and to reduce threats of data breaches  
634 [98]. By providing clear and transparent information about data handling and privacy policies,  
635 organizations can build trust by helping clients make informed decisions about how their personal  
636 information is used (see [topic XX.7 Marketing and labeling](#)). By undertaking due diligence on data  
637 governance and management systems of current and potential investments, organizations can  
638 identify potential impacts in their value chains and influence investees to implement data protection  
639 practices.

640 **Reporting on client privacy and data security**

641 If the organization has determined client privacy and data security to be a material topic, this sub-  
 642 section lists the disclosures identified as relevant for reporting on the topic by the capital markets  
 643 sector.

STANDARD	DISCLOSURE	SECTOR STANDARD REF #
<b>Management of the topic</b>		
<b>GRI 3: Material Topics 2021</b>	<p data-bbox="448 539 1233 577"><a href="#">Disclosure 3-3 Management of material topics</a></p> <p data-bbox="448 584 1233 622"><i>Additional sector recommendations</i></p> <ul data-bbox="512 622 1233 1025" style="list-style-type: none"> <li>• Describe the cybersecurity approach for client privacy and data security.</li> <li>• Describe the approach to privacy and security when disclosing client data to third parties.</li> <li>• Describe how the organization informs clients about using client data in data analytics, including in conjunction with external data sources.</li> <li>• For investee stewardship related to client privacy and data security, report:                             <ul data-bbox="560 898 1233 1025" style="list-style-type: none"> <li>- agreed-upon targets related to investees' performance, along with metrics for evaluating progress;</li> <li>- examples of outcomes of investee stewardship.</li> </ul> </li> </ul>	XX.6.1
<b>Topic Standard disclosures</b>		
<b>GRI 418: Customer Privacy 2016</b>	<p data-bbox="448 1104 1233 1167"><a href="#">Disclosure 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data<sup>7</sup></a></p> <p data-bbox="448 1173 1233 1211"><i>Additional sector recommendations</i></p> <ul data-bbox="512 1211 1233 1299" style="list-style-type: none"> <li>• Report the total number of clients affected by the identified leaks, thefts, or losses of client data and the percentage of the affected retail clients.</li> </ul>	XX.6.2

644 **References and resources**

645 [GRI 418: Customer Privacy 2016](#) lists authoritative intergovernmental instruments relevant to  
 646 reporting on this topic.

647 The additional authoritative instruments and references used in developing this topic, as well as  
 648 resources that may be helpful for reporting on client privacy and data security by the capital markets  
 649 sector, are listed in the [Bibliography](#).

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<sup>7</sup> Organizations in the capital markets sector should understand this disclosure in relation to their clients.

## 650 **Topic [XX].[7] Marketing and labeling**

651 **Marketing and labeling refer to the information communicated when selling products and**  
652 **services to customers, which can influence their decision-making. This topic covers the**  
653 **impacts of the organization's product and service information, marketing communication, and**  
654 **labeling.**

655 Organizations in the capital markets sector may be involved with impacts related to marketing and  
656 labeling when communicating terms of products and services through their activities or as a result of  
657 their business relationships in all sectors of the economy.

658 Organizations are responsible for providing institutional and retail clients with fair and transparent  
659 information about their products and services. This particularly applies to fund documentation and  
660 includes information about fees associated sustainability credentials [102]. Long and complex terms  
661 can be challenging to understand, particularly for clients with lower levels of financial literacy. At the  
662 same time, clear and transparent information supports client protection, financial health and inclusion,  
663 along with appropriate products offered and adequate recourse mechanisms (see [topic XX.5](#)  
664 [Financial health and inclusion](#)).

665 How product information is communicated can affect a client's ability to fully understand a product or  
666 service and make informed decisions. Where organizations or their distributors, such as brokers,  
667 misstate or omit essential information, clients may purchase products they do not understand, need or  
668 do not meet their investment objectives. Organizations can also mislead their clients when  
669 sustainability information about their operations, products, or services is exaggerated or incorrect,  
670 resulting in less funding to support sustainable development. Both institutional and retail clients are at  
671 risk of purchasing products that are not in their best interest or falling victim to mis-selling practices  
672 such as high-pressure sales or exaggerated statements about a potential investment. This can occur  
673 when there is a conflict of interest between the organization or its distributors and the client, which  
674 may be exacerbated by internal and commercial pressures, such as brokers' remuneration schemes  
675 that encourage workers to prioritize sales over clients' needs.

676 By adhering to regulations and codes of conduct, organizations and their distributors can avoid  
677 misleading statements or omissions in marketing and labeling their products and services,  
678 contributing to more robust client protection. Anti-greenwashing regulations and sustainability  
679 taxonomies increasingly protect clients from greenwashing and provide greater assurance of financial  
680 products' environmental and social credentials. However, these regulatory developments are  
681 jurisdiction-specific, meaning such assurance is not universal nor consistent worldwide [103].

682 Organizations can use different means to assist clients in understanding and engaging with product  
683 information. For example, organizations can make key product information more accessible by  
684 translating information, employing simple language, and using different font sizes [103]. Organizations  
685 can also implement mechanisms to manage marketing and labeling-related impacts, such as relevant  
686 training and internal systems that signal risky levels of selling.

687 **Reporting on marketing and labeling**

688 If the organization has determined marketing and labeling to be a material topic, this sub-section lists  
 689 the disclosures identified as relevant for reporting on the topic by the capital markets sector.

STANDARD	DISCLOSURE	SECTOR STANDARD REF #
<b>Management of the topic</b>		
<b>GRI 3: Material Topics 2021</b>	<p><a href="#">Disclosure 3-3 Management of material topics</a></p> <p><i>Additional sector recommendations</i></p> <ul style="list-style-type: none"> <li>• Describe the actions taken by the organization to assist clients in understanding investment product terms and associated fees, including promoting training for workers and distributors.</li> <li>• Describe how the organization monitors the fairness and transparency of its distributors' <u>marketing communications</u> when selling and promoting its investment products.</li> <li>• Describe how the organization informs potential and current clients at the pre-sale stage about conflicts of interest.</li> <li>• Describe the dispute and recourse mechanisms for client complaints regarding marketing and labeling, including:                             <ul style="list-style-type: none"> <li>- mislabeling of investment products;</li> <li>- mis-selling practices by the organization's workers or distributors.</li> </ul> </li> <li>• For investee stewardship related to marketing and labeling, report:                             <ul style="list-style-type: none"> <li>- agreed-upon targets related to investees' performance, along with metrics for evaluating progress;</li> <li>- examples of outcomes of investee stewardship.</li> </ul> </li> </ul>	XX.7.1
<b>Topic Standard disclosures</b>		
<b>GRI 417: Marketing and Labeling 2016</b>	<p><a href="#">Disclosure 417-2 Incidents of non-compliance concerning product and service information and labeling</a></p> <p><i>Additional sector recommendations</i></p> <ul style="list-style-type: none"> <li>• Report the total number of incidents of non-compliance with regulations or voluntary codes concerning <u>product and service information and labeling</u> that remained unresolved at the end of the period.</li> </ul>	XX.7.2
	<p><a href="#">Disclosure 417-3 Incidents of non-compliance concerning marketing communications</a></p> <p><i>Additional sector recommendations</i></p> <ul style="list-style-type: none"> <li>• Report the total number of incidents of non-compliance with regulations or voluntary codes concerning marketing communications that remained unresolved at the end of the period.</li> </ul>	XX.7.3
<b>Additional sector disclosures</b>		
	Report the taxonomies, regulations, and standards the organization complies with in marketing and labeling its sustainable investment products.	XX.7.4

690 **References and resources**

691 [GRI 417: Marketing and Labeling 2016](#) lists authoritative intergovernmental instruments and  
692 additional references relevant to reporting on this topic.

693 The additional authoritative instruments and references used in developing this topic, as well as  
694 resources that may be helpful for reporting on marketing and labeling by the capital markets sector,  
695 are listed in the [Bibliography](#).

Exposure draft for public comment

696

## Topic [XX].[8] Local communities and rights of Indigenous Peoples

697

698 **Local communities and Indigenous Peoples comprise individuals living or working in areas**  
699 **that are affected, or that could be affected by an organization’s activities. Indigenous Peoples**  
700 **are at higher risk of experiencing negative impacts more severely as a result of an**  
701 **organization’s activities. This topic covers socioeconomic and human rights impacts on local**  
702 **communities and the rights of Indigenous Peoples, including in relation to cultural heritage**  
703 **and health.**

704 Organizations in the capital markets sector may be involved with impacts on local communities and  
705 the rights of Indigenous Peoples as a result of their business relationships in all sectors of the  
706 economy.

707 Impacts on local communities and the rights of Indigenous Peoples can stem from investing in  
708 infrastructure projects and economic activities. These activities may lead to environmental  
709 degradation, displacement, involuntary resettlement, or changes in land use. Such impacts can affect  
710 the cultural preservation and livelihoods of local communities and Indigenous Peoples, as well as  
711 result in threats to human rights defenders and other stakeholders that may be exposed to retaliation.  
712 Negative impacts can be particularly severe for Indigenous Peoples, undermining their relationship  
713 with ancestral lands, territories, and resources (see [topic XX.2 Biodiversity](#)). As such, organizations  
714 must uphold Indigenous Peoples’ right to free, prior, and informed consent (FPIC) and safeguard the  
715 rights to self-determination and participation [105].

716 Organizations in the capital markets sector are expected to conduct human rights due diligence to  
717 identify risks to people and to address and account for actual and potential human rights impacts  
718 [104], [106]. This includes identifying the negative impacts on local communities and the rights of  
719 Indigenous Peoples from investees, assessing the nature of these impacts, and determining the  
720 organizations’ involvement with them. Based on this assessment, actions should be taken to address  
721 the negative impacts. Organizations can also set investment policies that safeguard local  
722 communities and the rights of Indigenous Peoples, and engage with portfolio organizations or with  
723 engage with local communities and Indigenous groups.

724 The sector can also have positive impacts on local communities and Indigenous Peoples by  
725 supporting economic development through access to finance for organizations and activities with  
726 inherent social benefits, such as housing, healthcare, transport, and telecommunications. Increasing  
727 access to finance for women, Indigenous Peoples, and small and medium-sized enterprises, can  
728 further enhance economic development and support projects with a positive social impact (see [topic](#)  
729 [XX.18 Economic impacts](#)). In addition, responsible business practices can help local communities  
730 through actions such as microfinance and community development projects.

731 **Reporting on local communities and rights of Indigenous Peoples**

732 If the organization has determined local communities and rights of Indigenous Peoples to be  
 733 a material topic, this sub-section lists the disclosures identified as relevant for reporting on the topic  
 734 by the capital markets sector.

STANDARD	DISCLOSURE	SECTOR STANDARD REF #
<b>Management of the topic</b>		
<b>GRI 3: Material Topics 2021</b>	<p data-bbox="403 551 943 577"><a href="#">Disclosure 3-3 Management of material topics</a></p> <p data-bbox="403 595 818 622"><i>Additional sector recommendations</i></p> <ul style="list-style-type: none"> <li data-bbox="443 629 1211 1173"> <p>• Describe the approach to managing impacts from investees on local communities and rights of Indigenous Peoples, including:</p> <ul style="list-style-type: none"> <li data-bbox="491 719 1211 808">– how the organization assesses the quality of engagement with affected stakeholders conducted by its investees;</li> <li data-bbox="491 815 1211 871">– how the organization assesses the extent to which investees abide by FPIC procedures;</li> <li data-bbox="491 878 1211 994">– how the organization assesses the quality of safeguards implemented by investees for the protection of human rights defenders or other stakeholders that are exposed to retaliation;</li> <li data-bbox="491 1001 1211 1173">– whether and how the organization conducts its own engagement with stakeholders affected by its investees, including:                             <ul style="list-style-type: none"> <li data-bbox="603 1090 1211 1173">– if engagement with stakeholders affected by investees is done through proxies or experts and how those are selected.</li> </ul> </li> </ul> </li> <li data-bbox="443 1180 1211 1330"> <p>• For investee stewardship related to local communities and rights of Indigenous Peoples, report:</p> <ul style="list-style-type: none"> <li data-bbox="491 1247 1211 1303">– agreed-upon targets related to investees' performance, along with metrics for evaluating progress;</li> <li data-bbox="491 1310 1211 1330">– examples of outcomes of investee stewardship.</li> </ul> </li> </ul>	XX.8.1
<b>Additional sector disclosures</b>		
	Report the total number of identified incidents of violation involving the rights of Indigenous Peoples related to investees' infrastructure projects.	XX.8.2

735 **References and resources**

736 [GRI 411: Rights of Indigenous Peoples 2016](#) and [GRI 413: Local Communities 2016](#) list authoritative  
 737 intergovernmental instruments and additional references relevant to reporting on this topic.

738 The additional authoritative instruments and references used in developing this topic, as well as  
 739 resources that may be helpful for reporting on local communities and on the rights of Indigenous  
 740 Peoples by the capital markets sector, are listed in the [Bibliography](#).



## 741 **Topic [XX].[9] Conflict-affected and high-risk areas**

742 **When operating in or providing services to conflict-affected and high-risk areas, organizations**  
743 **are more likely to be involved in human rights and legal violations and be implicated in**  
744 **corruption and financial flows contributing to conflict. This topic covers an organization's**  
745 **approach and impacts related to operating in or providing services to conflict-affected and**  
746 **high-risk areas.**

747 Violent conflicts worldwide have increased to the highest levels observed over the past three decades  
748 [114], [115]. Organizations in the capital markets sector may be involved with impacts in conflict-  
749 affected and high-risk areas as a result of their activities and business relationships in all sectors of  
750 the economy.

751 Organizations in the sector can have impacts related to conflict-affected and high-risk areas through  
752 their portfolios, for example, in the form of investments made into sectors that extract natural  
753 resources or depend on supply chains sourcing materials from these places. Private sector  
754 investments may also inadvertently intensify conflicts through engagement and strategic partnerships  
755 with sovereign wealth funds operating in conflict-prone countries. Organizations can enact measures  
756 to avoid funds that contribute to conflicts, exacerbate local tensions, or originate from authoritarian  
757 regimes [116].

758 Organizations are expected to comply with national and international sanctions and conduct  
759 heightened due diligence on business relationships to identify and manage potential negative impacts  
760 of gross human rights abuses in conflict-affected areas [113], [117]. A conflict-sensitive approach can  
761 complement human rights due diligence [113]. This can include screening third-party organizations  
762 and activities that can exacerbate drivers of conflict, especially in high-risk areas, such as security  
763 and surveillance services, and excluding investees as a result of screening [118]. Organizations can  
764 enhance their due diligence by requiring their investees to conduct conflict analysis in addition to  
765 human rights impact assessments. This approach supports identifying both human rights and conflict  
766 risks [119], including factors such as loss of livelihoods and displacement in the analysis, which can  
767 inform subsequent mitigation actions. Organizations are responsible for respecting human rights and  
768 international humanitarian law in all contexts, including conflicts over territory, resources, and power  
769 [112].

770 Conflicts can take different forms, such as occupation or internal armed conflicts, and their status can  
771 change quickly. Due to the dynamic nature of conflict, organizations can take a preventative approach  
772 to undertaking conflict analysis in their activities and investments. This includes regularly monitoring  
773 the geopolitical situations in conflict-affected and high-risk areas in combination with external data  
774 sources, such as corruption indexes and authoritative lists of business activities that facilitate activities  
775 in contravention of international humanitarian law, to understand the organization's exposure to actual  
776 and potential impacts.

777 In addition, organizations may be involved with negative impacts related to conflict-affected and high-  
778 risk areas by investing in the defense sector when investees export weapons to those areas.  
779 Organizations can assess the extent to which investees in the defense sector adhere to and respect  
780 applicable regulations, including sanctions and embargoes. Special consideration should be given to  
781 weapons regulated under international humanitarian law, where treaties, such as the Treaty on the  
782 Prohibition of Nuclear Weapons, serve as one of the relevant international instruments that  
783 organizations can incorporate in their due diligence analysis. In conjunction with ongoing conflict  
784 analysis, organizations can develop specific policies that align with international weapons treaties and  
785 commit to upholding human rights to help manage actual and potential negative impacts.

786 Organizations in the capital market sector can have positive impacts on conflict-affected and high-risk  
787 areas by supporting their economic development and providing access to capital for economic  
788 recovery and reconstruction, for example [120]. Organizations can positively contribute to peace and  
789 stability by introducing investment instruments, such as peace bonds and peace equity, to support  
790 sustainable development in fragile contexts while minimizing potential negative impacts on local  
791 dynamics [121]. When conflict erupts in a country where organizations' offices, subsidiaries, or

792 branches are located, they are expected to assess the impacts of their activities in that geographic  
793 location [113], [117].

Exposure draft for public comment

794 **Reporting on conflict-affected and high-risk areas**

795 If the organization has determined conflict-affected and high-risk areas to be a material topic, this sub-  
 796 section lists the disclosures identified as relevant for reporting on the topic by the capital markets  
 797 sector.

STANDARD	DISCLOSURE	SECTOR STANDARD REF #
<b>Management of the topic</b>		
<b>GRI 3: Material Topics 2021</b>	<p data-bbox="448 539 1230 595"><a href="#">Disclosure 3-3 Management of material topics</a></p> <p data-bbox="448 595 1230 629"><i>Additional sector recommendations</i></p> <ul data-bbox="512 651 1230 1084" style="list-style-type: none"> <li>• Describe the organization’s due diligence expectations for investees with activities in conflict-affected and high-risk areas.</li> <li>• Describe the approach to assessing investees’ due diligence processes and adherence to international humanitarian law for activities in conflict-affected and high-risk areas and how this assessment informs investment decisions.</li> <li>• For investee stewardship related to conflict-affected and high-risk areas, report:                             <ul data-bbox="560 965 1230 1084" style="list-style-type: none"> <li>- agreed-upon targets related to investees’ performance, along with metrics for evaluating progress;</li> <li>- examples of outcomes of investee stewardship.</li> </ul> </li> </ul>	XX.9.1
<b>Additional sector disclosures</b>		
<p data-bbox="193 1162 1230 1218">Report the monetary value at the end of the <u>reporting period</u> of the investment portfolio exposed to conflict-affected and high-risk areas, including:</p> <ul data-bbox="240 1218 1230 1285" style="list-style-type: none"> <li>• the absolute amount;</li> <li>• the percentage of the total value of the portfolio.</li> </ul> <p data-bbox="193 1308 1230 1375">Describe how the organization’s investment portfolio is exposed to conflict-affected and high-risk areas, including:</p> <ul data-bbox="240 1375 1230 1442" style="list-style-type: none"> <li>• how investments may exacerbate negative impacts in these areas;</li> <li>• how investments may prevent, mitigate, or remediate impacts in these areas.</li> </ul> <p data-bbox="193 1464 1230 1532">Describe how the organization defines conflict-affected and high-risk areas, including the data sources and the assumptions made.</p>		XX.9.2
<p data-bbox="193 1532 1230 1576">Report from the organization’s conflict analysis:</p> <ul data-bbox="240 1576 1230 1632" style="list-style-type: none"> <li>• examples of divestment decisions;</li> <li>• examples of disengaged or divested investees.</li> </ul>		XX.9.3
<p data-bbox="193 1632 1230 1666">Describe the approach for investing in the defense sector, including:</p> <ul data-bbox="240 1666 1230 1877" style="list-style-type: none"> <li>• whether the organization has a policy for investing in the defense sector;</li> <li>• the types of investees active in the defense sector included and excluded from the above policy.</li> <li>• how it considers international weapon treaties, international humanitarian law, and relevant regulations;</li> <li>• how it relates to the policies and commitments on human rights and conflict-affected and high-risk areas;</li> </ul>		XX.9.4

798 **References and resources**

799 The authoritative instruments and references used in developing this topic, as well as resources that  
800 may be helpful for reporting on conflict-affected and high-risk areas by the capital markets sector, are  
801 listed in the [Bibliography](#).

Exposure draft for public comment

## 802 **Topic [XX].[10] Non-discrimination and equal** 803 **opportunity**

804 **Freedom from discrimination is a human right and a fundamental right at work. Discrimination**  
805 **can impose unequal burdens on individuals or deny fair opportunities on the basis of**  
806 **individual merit. This topic covers impacts from discrimination and practices related to equal**  
807 **opportunity.**

808 Organizations in the capital markets sector may be involved with impacts related to discrimination and  
809 equal opportunity through their activities or as a result of their business relationships in all sectors of  
810 the economy.

811 Discrimination against workers within the capital markets sector can take various forms, such as hiring  
812 biases, unfair promotion opportunities, and unfair workload distribution. It can occur, for example,  
813 based on ethnicity, religion, gender, or socioeconomic background. Organizations can take actions to  
814 promote diversity and equal opportunity at governance and worker levels, such as anti-discrimination  
815 policies and inclusive hiring practices. These actions can combat discrimination and promote equal  
816 opportunity, resulting in fairer access to promotions, job opportunities, and remuneration (see [topic](#)  
817 [XX.16 Remuneration and working time](#)) [127].

818 Discrimination can occur between a capital markets organization and its clients or between the  
819 organization's distributors, such as brokers, and its clients, through unequal treatment, or access to  
820 investment products and services (see [topic XX.5 Financial health and inclusion](#)). Organizations may  
821 engage in discriminatory practices when selecting other organizations to invest in, potentially against  
822 organizations based on their owner's background or other attributes, such as ethnicity or gender.  
823 Asset owners and allocators can discriminate when selecting asset managers, and asset managers  
824 and owners can discriminate when allocating and pricing capital. Organizations in the capital markets  
825 sector can combat discrimination by implementing policies and procedures that prevent discrimination  
826 and making these policies publicly available. This can include anti-discrimination guidelines, a  
827 transparent complaint resolution process, and audits to ensure compliance.

828 Organizations in the capital markets sector may be involved with impacts related to discrimination and  
829 equal opportunity as a result of their business relationships. This can occur when investing in  
830 organizations that promote unfair treatment of their workers and customers, such as organizations  
831 that exclude certain groups from their products or services based on gender or ethnicity. They may  
832 also be involved with impacts related to discrimination and equal opportunity when outsourcing  
833 services to organizations that discriminate against workers or do not provide equal opportunities at  
834 work.

835 Organizations are expected to conduct human rights due diligence to address discrimination and lack  
836 of equal opportunity. This includes identifying negative impacts related to discrimination across their  
837 activities and business relationships, assessing the nature of these impacts, and determining the  
838 organizations' involvement with them. Based on this assessment, actions should be taken to address  
839 the negative impacts [126].

840 When organizations are involved with negative impacts related to discrimination and equal opportunity  
841 as a result of their business relationships, they are expected to use their leverage to encourage their  
842 business relationships to address the impacts. This can involve engaging with clients, investees, or  
843 suppliers, and playing a role in providing for or cooperating in the remediation of these impacts [126].  
844 Organizations can use their stewardship of investees to improve corporate practices and public  
845 disclosures related to discrimination and equal opportunity. Additionally, the capital markets sector can  
846 support equal opportunity actions by setting up initiatives to expand investment in vulnerable groups  
847 [128].

848 **Reporting on non-discrimination and equal opportunity**

849 If the organization has determined non-discrimination and equal opportunity to be a material topic, this  
 850 sub-section lists the disclosures identified as relevant for reporting on the topic by the capital markets  
 851 sector.

STANDARD	DISCLOSURE	SECTOR STANDARD REF #
<b>Management of the topic</b>		
<b>GRI 3: Material Topics 2021</b>	<p><a href="#">Disclosure 3-3 Management of material topics</a></p> <p><i>Additional sector recommendations</i></p> <ul style="list-style-type: none"> <li>• Describe the initiatives to promote equal opportunities for workers.</li> <li>• Describe the training initiatives for workers and distributors aimed at promoting non-discriminatory practices towards clients.</li> <li>• For investee stewardship related to non-discrimination and equal opportunity, report:               <ul style="list-style-type: none"> <li>- agreed-upon targets related to investees' performance, along with metrics for evaluating progress;</li> <li>- examples of outcomes of investee stewardship.</li> </ul> </li> </ul>	XX.10.1
<b>Topic Standard disclosures</b>		
<b>GRI 405: Diversity and Equal Opportunity 2016</b>	<p><a href="#">Disclosure 405-1 Diversity of governance bodies and employees</a></p>	XX.10.2
<b>GRI 406: Non-discrimination 2016</b>	<p><a href="#">Disclosure 406-1 Incidents of discrimination and corrective actions taken</a></p> <p><i>Additional sector recommendations</i></p> <ul style="list-style-type: none"> <li>• Report a breakdown of the total number of incidents of discrimination during the <u>reporting period</u> by:               <ul style="list-style-type: none"> <li>- incidents related to discrimination of workers;</li> <li>- incidents related to discrimination of clients;</li> <li>- incidents related to discrimination of investees;</li> <li>- incidents related to discrimination of other <u>stakeholders</u>.</li> </ul> </li> </ul>	XX.10.3

852 **References and resources**

853 [GRI 405: Diversity and Equal Opportunity 2016](#) and [GRI 406: Non-discrimination 2016](#) list  
 854 authoritative intergovernmental instruments relevant to reporting on this topic.

855 The additional authoritative instruments and references used in developing this topic, as well as  
 856 resources that may be helpful for reporting on non-discrimination and equal opportunity by the capital  
 857 markets sector, are listed in the [Bibliography](#).

## 858 **Topic [XX].[11] Forced or compulsory labor**

859 **Forced or compulsory labor is work or service which is exacted from any person under the**  
860 **menace of penalty and for which a person has not offered themselves voluntarily. Freedom**  
861 **from forced or compulsory labor is a human right and a fundamental right at work. This topic**  
862 **covers an organization's approach to identifying and addressing forced or compulsory labor**  
863 **across its value chain.**

864 In 2021, around 50 million people were estimated to be involved with compulsory labor, with 27.6  
865 million of these individuals subjected to forced labor [131]. Organizations in the capital markets sector  
866 may be involved with impacts related to forced or compulsory labor through their activities or as a  
867 result of their business relationships in all sectors of the economy. Although forced or compulsory  
868 labor is not common within organizations in the capital markets sector, they may be involved with  
869 related impacts, for example, when outsourcing services to organizations that use forced or  
870 compulsory labor.

871 Organizations are expected to conduct human rights due diligence to address forced or compulsory  
872 labor. This includes identifying negative impacts related to forced or compulsory labor across their  
873 activities and business relationships, assessing the nature of these impacts, and determining  
874 organizations' involvement with them. Based on this assessment, actions should be taken to address  
875 the negative impacts [130]. Organizations may be involved with the negative impacts of forced or  
876 compulsory labor through their business relationships, such as by investing in organizations or  
877 procuring products or services from suppliers involved with impacts related to forced or compulsory  
878 labor. Special attention may be needed when dealing with business relationships in sectors with  
879 heightened risks of forced or compulsory labor. A similar focus can also apply to specific geographic  
880 locations, particularly where there are heightened risks for vulnerable workers, such as migrant  
881 workers [132].

882 When organizations are involved with negative impacts related to forced or compulsory labor as a  
883 result of their business relationships, they are expected to use their leverage to encourage their  
884 business relationships to address those impacts. This can involve engaging with clients, investees, or  
885 suppliers and playing a role in providing for or cooperating in the remediation of those impacts [130].  
886 In their investment portfolios, organizations can use their leverage to address actual and potential  
887 negative impacts by making informed investment decisions, exercising stewardship with investees,  
888 and engaging in dialogues with policymakers and other stakeholders. Leverage will depend on  
889 contextual factors, such as the nature of a transaction or relationship. For example, private equity  
890 ownership and active management involve different leverage dynamics than passive investment.  
891 Equity investors have more direct mechanisms to undertake stewardship activities, such as proxy  
892 voting rights [133]. To increase their leverage, organizations in the capital markets sector can engage  
893 with other stakeholders that address impacts related to forced or compulsory labor, such as civil  
894 society organizations or sector-wide initiatives.

895 **Reporting on forced or compulsory labor**

896 If the organization has determined forced or compulsory labor to be a material topic, this sub-section  
 897 lists the disclosures identified as relevant for reporting on the topic by the capital markets sector.

STANDARD	DISCLOSURE	SECTOR STANDARD REF #
<b>Management of the topic</b>		
<b>GRI 3: Material Topics 2021</b>	<a href="#">Disclosure 3-3 Management of material topics</a>  <i>Additional sector recommendations</i> <ul style="list-style-type: none"> <li>• For investee stewardship related to forced or compulsory labor, report:                             <ul style="list-style-type: none"> <li>- agreed-upon targets related to investees' performance, along with metrics for evaluating progress;</li> <li>- examples of outcomes of investee stewardship.</li> </ul> </li> </ul>	XX.11.1
<b>Topic Standard disclosures</b>		
<b>GRI 409: Forced or Compulsory Labor 2016</b>	<a href="#">Disclosure 409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor</a>	XX.11.2

898 **References and resources**

899 [GRI 409: Forced or Compulsory Labor 2016](#) lists authoritative intergovernmental instruments relevant  
 900 to reporting on this topic.

901 The additional authoritative instruments and references used in developing this topic, as well as  
 902 resources that may be helpful for reporting on forced or compulsory labor by the capital markets  
 903 sector, are listed in the [Bibliography](#).



904 **Topic [XX].[12] Child labor**

905 **Child labor is defined as work that deprives children of their childhood, their potential, and**  
906 **their dignity, and that is harmful to their development, including by interfering with their**  
907 **education. It is a violation of human rights and can lead to lifelong negative impacts. Abolition**  
908 **of child labor is a fundamental principle and right at work. This topic covers an organization’s**  
909 **approach to identifying and addressing child labor across its value chain.**

910 Around 160 million children were engaged in child labor in 2020, with nearly half subjected to  
911 dangerous and hazardous work [137]. Organizations in the capital markets sector may be involved  
912 with impacts related to child labor through their activities or as a result of their business relationships  
913 in all sectors of the economy. Although child labor is not common within organizations in the capital  
914 markets sector, they may be involved with related impacts, for example, when outsourcing services to  
915 organizations that use child labor.

916 Organizations are expected to conduct human rights due diligence to address child labor. This  
917 includes identifying negative impacts related to child labor across their activities and business  
918 relationships, assessing the nature of these impacts, and determining organizations’ involvement with  
919 them. Based on this assessment, actions should be taken to address the negative impacts [136].  
920 Organizations may be involved with impacts related to child labor through the provision of products  
921 and services, such as investing in organizations in sectors with heightened risks of child labor, or in  
922 geographic locations where the remuneration of parents is insufficient to meet the basic cost-of-living  
923 estimates. Additionally, organizations in the capital markets sector may procure products or services  
924 from suppliers involved with child labor impacts.

925 When organizations are involved with negative impacts related to child labor as a result of their  
926 business relationships, they are expected to use their leverage to encourage their business  
927 relationships to address those impacts. This can involve engaging with clients, investees, or suppliers  
928 and playing a role in providing for or cooperating in the remediation of those impacts [136]. In their  
929 investment portfolios, organizations can use their leverage to address actual and potential negative  
930 impacts by making informed investment decisions, exercising stewardship with investees, and  
931 engaging in dialogues with policymakers and other stakeholders. Leverage will depend on contextual  
932 factors, such as the nature of a transaction or relationship. For example, private equity ownership and  
933 active management involve different leverage dynamics than passive investment. Equity investors  
934 have more direct mechanisms to undertake stewardship activities, such as proxy voting rights [138].  
935 To increase their leverage, organizations in the capital markets sector can engage with other  
936 stakeholders that address impacts related to child labor, such as civil society organizations or sector-  
937 wide initiatives.

938 **Reporting on child labor**

939 If the organization has determined child labor to be a material topic, this sub-section lists the  
 940 disclosures identified as relevant for reporting on the topic by the capital markets sector.

STANDARD	DISCLOSURE	SECTOR STANDARD REF #
<b>Management of the topic</b>		
<b>GRI 3: Material Topics 2021</b>	<a href="#">Disclosure 3-3 Management of material topics</a>  <i>Additional sector recommendations</i> <ul style="list-style-type: none"> <li>• For investee stewardship related to child labor, report:               <ul style="list-style-type: none"> <li>- agreed-upon targets related to investees' performance, along with metrics for evaluating progress;</li> <li>- examples of outcomes of investee stewardship.</li> </ul> </li> </ul>	XX.12.1
<b>Topic Standard disclosures</b>		
<b>GRI 408: Child Labor 2016</b>	<a href="#">Disclosure 408-1 Operations and suppliers at significant risk for incidents of child labor</a>	XX.12.2

941 **References and resources**

942 [GRI 408: Child Labor 2016](#) lists authoritative intergovernmental instruments relevant to reporting on  
 943 this topic.

944 The additional authoritative instruments and references used in developing this topic, as well as  
 945 resources that may be helpful for reporting on child labor by the capital markets sector, are listed in  
 946 the [Bibliography](#).

947 **Topic [XX].[13] Freedom of association and**  
948 **collective bargaining**

949 **Freedom of association and collective bargaining are human rights and fundamental rights at**  
950 **work. They include the rights of employers and workers to form, join, and run their own**  
951 **organizations without prior authorization or interference, and to collectively negotiate working**  
952 **conditions and terms of employment. This topic covers an organization’s approach and**  
953 **impacts related to freedom of association and collective bargaining.**

954 Organizations in the capital markets sector may be involved with impacts related to freedom of  
955 association and collective bargaining through their activities or as a result of their business  
956 relationships in all sectors of the economy.

957 Organizations in the capital markets sector are significant employers and play an important role in  
958 shaping labor practices that enable or prevent freedom of association and collective bargaining. This  
959 can include outsourcing or offshoring certain job functions to locations with weaker labor protections.  
960 The rise of casualization, marked by casual work and contract labor that lack social protection and  
961 employment security, can also have impacts on freedom of association and collective bargaining (see  
962 [topics XX.15 Employment](#) and [XX.17 Significant changes for workers](#)) [141]. Organizations can  
963 establish clear policies and procedures regarding freedom of association and collective bargaining to  
964 uphold worker rights. These measures ensure that workers can form and join trade unions and  
965 engage in collective bargaining without fear of reprisal.

966 Organizations may be involved with impacts related to freedom of association and collective  
967 bargaining by investing in organizations that violate workers' rights, such as those that obstruct union  
968 activity [141]. Additionally, they may procure products or services from suppliers that are involved with  
969 impacts related to freedom of association and collective bargaining. Particular attention may be  
970 needed when dealing with business relationships in sectors and geographic locations where there are  
971 heightened risks of violations of freedom of association and collective bargaining [142].

972 Organizations are expected to conduct human rights due diligence to address negative impacts  
973 related to freedom of association and collective bargaining. This includes identifying those negative  
974 impacts across their activities and business relationships, assessing the nature of those impacts, and  
975 determining organizations’ involvement with them. Based on this assessment, actions should be  
976 taken to address the negative impacts [140].

977 When organizations are involved with negative impacts related to freedom of association and  
978 collective bargaining as a result of their business relationships, they are expected to use their  
979 leverage to encourage their business relationships to address the impacts. This can involve engaging  
980 with clients, investees, or suppliers and playing a role in providing for or cooperating in the  
981 remediation of those impacts [140]. In their investment portfolios, organizations can use their leverage  
982 to address actual and potential negative impacts by making informed investment decisions, exercising  
983 stewardship with investees, and engaging in dialogues with policymakers and other stakeholders.  
984 Leverage will depend on contextual factors, such as the nature of a transaction or relationship. For  
985 example, private equity ownership and active management involve different leverage dynamics than  
986 passive investment. Equity investors have more direct mechanisms to undertake stewardship  
987 activities, such as proxy voting rights [143]. To increase their leverage, organizations in the capital  
988 markets sector can engage with other stakeholders that address impacts related to freedom of  
989 association and collective bargaining, such as trade unions, global union federations, or field-building  
990 institutions across these topics [144].

991 **Reporting on freedom of association and collective bargaining**

992 If the organization has determined freedom of association and collective bargaining to be a material  
 993 topic, this sub-section lists the disclosures identified as relevant for reporting on the topic by the  
 994 capital markets sector.

STANDARD	DISCLOSURE	SECTOR STANDARD REF #
<b>Management of the topic</b>		
<b>GRI 3: Material Topics 2021</b>	<a href="#">Disclosure 3-3 Management of material topics</a> <i>Additional sector recommendations</i> <ul style="list-style-type: none"> <li>• For investee stewardship related to freedom of association and collective bargaining, report:               <ul style="list-style-type: none"> <li>- agreed-upon targets related to investees' performance, along with metrics for evaluating progress;</li> <li>- examples of outcomes of investee stewardship.</li> </ul> </li> </ul>	XX.13.1
<b>Topic Standard disclosures</b>		
<b>GRI 407: Freedom of Association and Collective Bargaining 2016</b>	<a href="#">Disclosure 407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk</a>	XX.13.2

995 **References and resources**

996 [GRI 407: Freedom of Association and Collective Bargaining 2016](#) lists authoritative intergovernmental  
 997 instruments relevant to reporting on this topic.

998 The additional authoritative instruments and references used in developing this topic, as well as  
 999 resources that may be helpful for reporting on freedom of association and collective bargaining by the  
 1000 capital markets sector, are listed in the [Bibliography](#).

## 1001 **Topic [XX].[14] Occupational health and safety**

1002 **Healthy and safe work conditions are recognized as a human right and a fundamental right at**  
1003 **work. Occupational health and safety involves the prevention of physical and mental harm to**  
1004 **workers and the promotion of workers' health. This topic covers impacts related to workers'**  
1005 **health and safety.**

1006 Organizations in the capital markets sector may be involved with occupational health and safety  
1007 impacts through their activities or as a result of their business relationships in all sectors of the  
1008 economy.

1009 Organizations in the capital markets sector can have negative impacts on the mental and physical  
1010 health of their workers due to excessive workloads, commercial pressures, and job insecurity, which  
1011 can lead to stress, burnout, and anxiety. Harassment and bullying at work can further exacerbate  
1012 mental and physical health issues and violate human rights. Inequality in earnings or opportunities  
1013 and discrimination can also lead to increased stress and the worsening of mental health conditions  
1014 (see [topic XX.10 Non-discrimination and equal opportunity](#)). They may be involved with negative  
1015 health and safety impacts when outsourcing services to organizations with weaker occupational  
1016 health and safety standards.

1017 Addressing issues from long working hours and flexible work arrangements is crucial to worker well-  
1018 being and a healthy work-life balance, including for remote workers (see [topic XX.16 Remuneration](#)  
1019 [and working time](#)). Organizations can integrate mental health into their occupational health and safety  
1020 management systems to address psychosocial risks comprehensively. This integration involves  
1021 prioritizing collective actions, engaging workers to identify and manage impacts, and ensuring  
1022 compliance with legal frameworks. Manager training in mental health awareness and communication  
1023 and worker training in mental health literacy are also essential for a healthy workplace [146].

1024 An estimated 2.78 million workers die each year from a work-related injury or ill health, while an  
1025 additional 374 million workers suffer from non-fatal work-related incidents [147]. Organizations may  
1026 be involved with negative occupational health and safety impacts as a result of their business  
1027 relationships, such as investing in or procuring products or services from other organizations that fail  
1028 to meet proper workplace safety standards. Special attention may be needed when dealing with  
1029 business relationships in sectors and geographic locations where there are heightened work-related  
1030 hazards. Specific sectors can have more significant occupational health and safety impacts on  
1031 workers due to a range of physical and long-term health risks. The most vulnerable to occupational  
1032 health and safety impacts include those in precarious employment, informal workers, micro-, small,  
1033 medium-enterprise (MSME) employees, and workers from marginalized groups, such as migrant  
1034 workers and racial minorities [148].

1035 Organizations are expected to conduct human rights due diligence to address negative occupational  
1036 health and safety impacts. This includes identifying negative occupational health and safety impacts  
1037 across their activities and business relationships, assessing the nature of these impacts, and  
1038 determining organizations' involvement with them. Based on this assessment, actions should be  
1039 taken to address the negative impacts [145].

1040 **Reporting on occupational health and safety**

1041 If the organization has determined occupational health and safety to be a material topic, this sub-  
 1042 section lists the disclosures identified as relevant for reporting on the topic by the capital markets  
 1043 sector.

STANDARD	DISCLOSURE	SECTOR STANDARD REF #
<b>Management of the topic</b>		
<b>GRI 3: Material Topics 2021</b>	<p><a href="#">Disclosure 3-3 Management of material topics</a></p> <p><i>Additional sector recommendations</i></p> <ul style="list-style-type: none"> <li>• For investee stewardship related to occupational health and safety, report:               <ul style="list-style-type: none"> <li>- agreed-upon targets related to investees' performance, along with metrics for evaluating progress;</li> <li>- examples of outcomes of investee stewardship.</li> </ul> </li> </ul>	XX.14.1
<b>Topic Standard disclosures</b>		
<b>GRI 403: Occupational Health and Safety 2018</b>	<a href="#">Disclosure 403-1 Occupational health and safety management system</a>	XX.14.2
	<a href="#">Disclosure 403-2 Hazard identification, risk assessment, and incident investigation</a>	XX.14.3
	<a href="#">Disclosure 403-3 Occupational health services</a>	XX.14.4
	<a href="#">Disclosure 403-4 Worker participation, consultation, and communication on occupational health and safety</a>	XX.14.5
	<a href="#">Disclosure 403-5 Worker training on occupational health and safety</a>	XX.14.6
	<a href="#">Disclosure 403-6 Promotion of worker health</a>	XX.14.7
	<a href="#">Disclosure 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships</a>	XX.14.8
	<a href="#">Disclosure 403-8 Workers covered by an occupational health and safety management system</a>	XX.14.9
	<a href="#">Disclosure 403-9 Work-related injuries</a>	XX.14.10
	<a href="#">Disclosure 403-10 Work-related ill health</a>	XX.14.11

1044 **References and resources**

1045 [GRI 403: Occupational Health and Safety 2018](#) lists authoritative intergovernmental instruments and  
 1046 additional references relevant to reporting on this topic.

1047 The additional authoritative instruments and references used in developing this topic, as well as  
 1048 resources that may be helpful for reporting on occupational health and safety by the capital markets  
 1049 sector, are listed in the [Bibliography](#).

## 1050 **Topic [XX].[15] Employment**

1051 **Employment refers to the various policies and practices that affect the relationship between an**  
1052 **organization and its workers. Employment-related policies and practices include recruitment,**  
1053 **termination, performance management, and privacy of workers. This topic covers impacts**  
1054 **related to employment practices.**

1055 Organizations in the capital markets sector may be involved with impacts related to employment  
1056 through their activities or as a result of their business relationships in all sectors of the economy.

1057 Organizations in the capital markets sector are significant employers and facilitate employment in  
1058 other sectors through access to financial services and capital (see [topic XX.18 Economic impacts](#))  
1059 [150]. As employers, the practices and policies of organizations in the capital markets sector have  
1060 impacts on workers, including through employment arrangements, recruitment and termination  
1061 policies, and performance management systems. Impacts related to employment practices are not  
1062 limited to employees but also extend to workers who are not employees, such as agency workers,  
1063 apprentices, and workers of suppliers to whom services are outsourced. By outsourcing activities,  
1064 organizations can reduce labor costs or bypass collective agreements (see [topic XX.13 Freedom of](#)  
1065 [association and collective bargaining](#)) that are in place for employees, potentially increasing  
1066 disparities between employees and workers who are not employees.

1067 Worker data is vital in contractual obligations, personnel administration, and human resources  
1068 functions. Organizations may monitor workers to track work hours, optimize processes, and evaluate  
1069 performance. When monitoring of workers is poorly managed, fails to adhere to applicable laws, or  
1070 when workers are not informed about monitoring activities, it can encroach upon a worker's privacy.  
1071 By implementing strong cybersecurity measures and adhering to data protection regulations,  
1072 organizations uphold their commitment to protect worker privacy [151].

1073 Organizations may be involved with negative impacts related to employment by investing in  
1074 organizations with inadequate policies and practices, such as precarious employment contracts or  
1075 insufficient safeguards for protecting workers' personal data. Conversely, organizations can contribute  
1076 to positive impacts by investing in other organizations with high-quality employment practices.  
1077 Organizations should use their leverage to encourage responsible employment practices across their  
1078 business relationships, such as client engagement and investee stewardship [152].

1079 **Reporting on employment**

1080 If the organization has determined employment to be a material topic, this sub-section lists the  
 1081 disclosures identified as relevant for reporting on the topic by the capital markets sector.

STANDARD	DISCLOSURE	SECTOR STANDARD REF #
<b>Management of the topic</b>		
<b>GRI 3: Material Topics 2021</b>	<p>Disclosure 3-3 Management of material topics</p> <p><i>Additional sector recommendations</i></p> <ul style="list-style-type: none"> <li>For investee stewardship related to employment, report:               <ul style="list-style-type: none"> <li>agreed-upon targets related to investees' performance, along with metrics for evaluating progress;</li> <li>examples of outcomes of investee stewardship.</li> </ul> </li> </ul>	XX.15.1
<b>Topic Standard disclosures</b>		
<b>GRI EMPL: Employment (Exposure draft)</b>	Disclosure EMPL 1 Employment arrangements	XX.15.2
	Disclosure EMPL 2 Apprenticeship and internship	XX.15.3
	Disclosure EMPL 3 Recruitment policies	XX.15.4
	Disclosure EMPL 4 Performance management systems	XX.15.5
	Disclosure EMPL 5 Personal data protection and privacy policies	XX.15.6
	Disclosure EMPL 6 Termination policies	XX.15.7
	Disclosure EMPL 7 New hires and turnover	XX.15.8
	Disclosure EMPL 8 Incidents related to recruitment	XX.15.9
	Disclosure EMPL 9 Performance reviews	XX.15.10
	Disclosure EMPL 10 Incidents related to personal data protection and privacy	XX.15.11

1082 **References and resources**

1083 [GRI EMPL: Employment \(exposure draft\)](#) lists authoritative intergovernmental instruments and  
 1084 additional references relevant to reporting on this topic.

1085 The additional authoritative instruments and references used in developing this topic, as well as  
 1086 resources that may be helpful for reporting on employment by the capital markets sector, are listed in  
 1087 the [Bibliography](#).



## 1088 **Topic [XX].[16] Remuneration and working time**

1089 **Remuneration comprises the basic salary and additional amounts paid to a worker, which**  
1090 **should ensure gender equality and non-discrimination. Working time refers to the period when**  
1091 **workers are at the disposal of the organization during a specified timeframe and does not**  
1092 **reflect the intensity or efficiency of time spent on work. This topic covers an organization's**  
1093 **approach to remuneration and working time, including social protection.**

1094 Organizations in the capital markets sector may be involved with impacts related to remuneration and  
1095 working time through their activities or as a result of their business relationships in all sectors of the  
1096 economy. Impacts related to remuneration and working time are not limited to employees and extend  
1097 to workers who are not employees, such as agency workers, apprentices, and workers of suppliers to  
1098 whom services are outsourced.

1099 Organizations in the capital market sector can have unequal remuneration practices characterized by  
1100 disproportionately high salaries, bonuses, and incentive schemes for certain positions. Such  
1101 remuneration practices can encourage excessive risk-taking, particularly when bonuses are tied to  
1102 short-term results without adequate consideration for long-term stability. The remuneration disparity  
1103 between senior executives and other workers also raises concerns about income inequality.  
1104 Organizations can improve equality by adopting policies that ensure balanced remuneration and  
1105 promote a more equitable pay framework across different worker levels.

1106 Remuneration practices can also be unequal based on gender. Globally, men employed in financial  
1107 services earn, on average, 22% higher incomes than women with the same profiles. The gender pay  
1108 gap is notably higher among senior executives in the financial services sector than in other sectors  
1109 [155] (see [topic XX.10 Non-discrimination and equal opportunity](#)).

1110 Long working hours are common for organizations in the capital markets sector. With the advent of  
1111 digitalization and post-Covid adaptations, telework has seen a significant uptake in the sector. While  
1112 telework can have positive impacts on work-life balance, the transition to telework may exacerbate  
1113 issues related to extended working hours, contributing to psychosocial impacts and stress [156].  
1114 These factors emphasize the importance for employers to prioritize worker well-being, including  
1115 addressing the issue of working hours, promoting leave and rest hours, and fostering a healthy work-  
1116 life balance.

1117 In addition to addressing remuneration and working time practices, organizations can enhance  
1118 workers' overall well-being by implementing comprehensive social protection measures, such as  
1119 unemployment and retirement benefits. Organizations may also be involved with impacts related to  
1120 remuneration and working time through their business relationships by investing in other  
1121 organizations with inadequate policies and practices in areas such as working excessive hours, for  
1122 example. In many jurisdictions, organizations can significantly influence the remuneration practices of  
1123 their investees through proxy voting on company remuneration policies. Organizations can use their  
1124 leverage to encourage responsible practices and policies related to remuneration and working time  
1125 across their investees, such as stewardship and engagement activities [157].

1126 **Reporting on remuneration and working time**

1127 If the organization has determined remuneration and working time to be a material topic, this sub-  
 1128 section lists the disclosures identified as relevant for reporting on the topic by the capital markets  
 1129 sector.

STANDARD	DISCLOSURE	SECTOR STANDARD REF #
<b>Management of the topic</b>		
<b>GRI 3: Material Topics 2021</b>	<p><a href="#">Disclosure 3-3 Management of material topics</a></p> <p><i>Additional sector recommendations</i></p> <ul style="list-style-type: none"> <li>• For investee stewardship related to remuneration and working time, report:               <ul style="list-style-type: none"> <li>- agreed-upon targets related to investees' performance, along with metrics for evaluating progress;</li> <li>- examples of outcomes of investee stewardship.</li> </ul> </li> </ul>	XX.16.1
<b>Topic Standard disclosures</b>		
<b>GRI REWO: Remuneration and Working Time (Exposure draft)</b>	<a href="#">Disclosure REWO 1 Policies to determine remuneration</a>	XX.16.2
	<a href="#">Disclosure REWO 2 Policies to determine working time</a>	XX.16.3
	<a href="#">Disclosure REWO 3 Transparency of remuneration and working time</a>	XX.16.4
	<a href="#">Disclosure REWO 4 Remuneration of workers</a>	XX.16.5
	<a href="#">Disclosure REWO 5 Basic gender pay gap</a>	XX.16.6
	<a href="#">Disclosure REWO 6 Social protection coverage</a>	XX.16.7
	<a href="#">Disclosure REWO 7 Monitoring working time</a>	XX.16.8

1130 **References and resources**

1131 [GRI REWO: Remuneration and Working Time \(exposure draft\)](#) lists authoritative intergovernmental  
 1132 instruments and additional references relevant to reporting on this topic.

1133 The additional authoritative instruments and references used in developing this topic, as well as  
 1134 resources that may be helpful for reporting on remuneration and working time by the capital markets  
 1135 sector, are listed in the [Bibliography](#).

1136 **Topic [XX].[17] Significant changes for workers**

1137 **A significant change is an alteration to the organization's pattern of operations that can have**  
1138 **significant impacts on workers performing the organization's activities, including mergers,**  
1139 **outsourcing operations, and restructuring. This topic covers an organization's impacts related**  
1140 **to significant changes for workers.**

1141 Organizations in the capital markets sector may be involved with impacts related to significant  
1142 changes for workers through their activities or as a result of their business relationships in all sectors  
1143 of the economy.

1144 Transformations for organizations in the capital markets sector, such as automation, the deployment  
1145 of new technologies, including generative artificial intelligence (AI), increasing industry concentration,  
1146 and globalization, can result in job displacement and income insecurity [159]. Redeployment, and up-  
1147 and re-skilling of workers are pivotal strategies that organizations can implement to support workers.

1148 Digitalization in financial services has also decentralized labor in the sector [159]. Outsourcing  
1149 activities could allow organizations in the capital markets sector to reduce labor costs or bypass  
1150 collective agreements that are in place for employees, potentially increasing disparities between  
1151 employees and workers who are not employees (see [topic XX.15. Employment](#) and [topic XX.13](#)  
1152 [Freedom of association and collective bargaining](#)).

1153 Mergers, acquisitions, and restructuring can have impacts on workers, including job insecurity, higher  
1154 job stress and workload, and increased forms of disguised employment. These changes can also lead  
1155 to mass terminations, which require compliance with consultation and notice period regulations.  
1156 Organizations can mitigate these impacts by prioritizing transparent communication, providing early  
1157 notice of operational changes, engaging with trade unions or worker representatives, and providing  
1158 support through resources and open social dialogue [160].

1159 Through their investments, organizations can use their leverage to restructure their business  
1160 relationships, such as investees, thereby affecting workers. Significant workplace changes can occur  
1161 in scenarios such as mergers and acquisitions, especially those led by private equity firms. This  
1162 highlights the importance of addressing their impacts on workers and ensuring adherence to  
1163 employment-related standards.

1164 **Reporting on significant changes for workers**

1165 If the organization has determined significant changes for workers to be a material topic, this sub-  
 1166 section lists the disclosures identified as relevant for reporting on the topic by the capital markets  
 1167 sector.

STANDARD	DISCLOSURE	SECTOR STANDARD REF #
<b>Management of the topic</b>		
<b>GRI 3: Material Topics 2021</b>	<a href="#">Disclosure 3-3 Management of material topics</a>  <i>Additional sector recommendations</i> <ul style="list-style-type: none"> <li>• For investee stewardship related to significant changes for workers, report:               <ul style="list-style-type: none"> <li>- agreed-upon targets related to investees' performance, along with metrics for evaluating progress;</li> <li>- examples of outcomes of investee stewardship.</li> </ul> </li> </ul>	XX.17.1
<b>Topic Standard disclosures</b>		
<b>GRI SICH: Significant Changes for Workers (Exposure draft)</b>	<a href="#">Disclosure SICH 1 Management of significant changes for workers</a>	XX.17.2
	<a href="#">Disclosure SICH 2 Minimum consultation and notice periods</a>	XX.17.3
	<a href="#">Disclosure SICH 3 Redeployment and training</a>	XX.17.4

1168 **References and resources**

1169 [GRI SICH: Significant Changes for Workers \(exposure draft\)](#) lists authoritative intergovernmental  
 1170 instruments and additional references relevant to reporting on this topic.

1171 The additional authoritative instruments and references used in developing this topic, as well as  
 1172 resources that may be helpful for reporting on significant changes for workers by the capital markets  
 1173 sector, are listed in the [Bibliography](#).

## 1174 **Topic [XX].[18] Economic impacts**

1175 **An organization's economic impacts refer to how it affects economic systems, including the**  
1176 **economic well-being of its stakeholders, through its operations, quality of products and**  
1177 **services, and business relationships at local, national, and global levels.**

1178 Organizations in the capital markets sector may be involved with economic impacts through their  
1179 activities or as a result of their business relationships in all sectors of the economy.

1180 The capital markets sector can support positive economic impacts by investing in assets and fostering  
1181 entrepreneurship, competition, sector diversity, and sustainable development, particularly in  
1182 developing economies and underserved communities [161], [162]. Universal owners particularly have  
1183 incentives to consider the broader economic impacts of their investments in the pursuit of long-term  
1184 financial returns derived from economies and an environment that is healthy and resilient [163].

1185 Business models that incorporate long-term strategies and incentive structures tied to sustainability  
1186 outcomes can support positive economic impacts, as well as a long-term approach to sustainable  
1187 development (see [Disclosures on incorporating sustainability in investment](#) in this Standard) [164].  
1188 Approaches like stakeholder governance which values various stakeholders' perspectives also help  
1189 organizations to be more aware of the trade-offs associated with their actions [165]. Through investee  
1190 stewardship, organizations may also promote positive economic impacts on issues such as inequality.

1191 Investment strategies and practices can also have negative economic impacts at local and national  
1192 levels [166]. Newly created jobs may not provide decent employment or adequate remuneration, as  
1193 documented in solar and electric vehicle supply chains [167], which can lead to economic and social  
1194 instability. In addition, policies that prioritize short-term financial goals and encourage high-risk  
1195 practices can lead to negative impacts that cascade through economies [164]. For example, certain  
1196 practices in commodities trading, such as the increased use of indexes, could be linked to more  
1197 volatile and higher food prices [168]. Where institutional investors have invested in single-family  
1198 homes, it can be harder for locals to purchase homes [169]. Economies perceived as high-risk can  
1199 face higher costs of capital from organizations in the sector, limiting opportunities for sustainable  
1200 development, particularly in developing countries [170].

1201 Organizations in the capital markets sector can have large, sometimes cross-border operations, that  
1202 spur positive economic impacts through revenues and operating costs distributed as worker salaries  
1203 and tax payments to governments. Organizations can have impacts on the long-term economic well-  
1204 being of their workers through the provision of retirement plans with appropriate provisions to pay for  
1205 such plans in the event of a crisis. In addition, the capital markets sector can benefit from the  
1206 economic impacts of government assistance through tax credits, financial incentives, guarantees to  
1207 promote public trust, and bailouts during financial crises.

1208 Organizations' economic impacts on individuals and micro-, small, and medium-sized enterprises  
1209 (MSMEs) are reflected in financial health and inclusion (see [topic XX.5 Financial health and inclusion](#)).

1210 **Reporting on economic impacts**

1211 If the organization has determined economic impacts to be a material topic, this sub-section lists the  
 1212 disclosures identified as relevant for reporting on the topic by the capital markets sector.

STANDARD	DISCLOSURE	SECTOR STANDARD REF #
<b>Management of the topic</b>		
<b>GRI 3: Material Topics 2021</b>	<p><a href="#">Disclosure 3-3 Management of material topics</a></p> <p><i>Additional sector recommendations</i></p> <ul style="list-style-type: none"> <li>Describe how the organization’s policies and commitments promote sustainable economic development through the development and distribution of its investments.</li> <li>For investee stewardship related to economic impacts, report:               <ul style="list-style-type: none"> <li>agreed-upon targets related to investees’ performance, along with metrics for evaluating progress;</li> <li>examples of outcomes of investee stewardship.</li> </ul> </li> </ul>	XX.18.1
<b>Topic Standard disclosures</b>		
<b>GRI 201: Economic Performance 2016</b>	<p><a href="#">Disclosure 201-1 Direct economic value generated and distributed</a></p>	XX.18.2
	<p><a href="#">Disclosure 201-3 Defined benefit plan obligations and other retirement plans</a></p> <p><i>Additional sector recommendations</i></p> <ul style="list-style-type: none"> <li>Report whether the organization has a fund or strategy to pay its pension liabilities in the event of a financial or operational crisis.</li> </ul>	XX.18.3
	<p><a href="#">Disclosure 201-4 Financial assistance received from government</a></p> <p><i>Additional sector recommendations</i></p> <ul style="list-style-type: none"> <li>Report by country the total monetary value of:               <ul style="list-style-type: none"> <li>government guarantees;</li> <li>government bailouts.</li> </ul> </li> <li>Describe government interventions, if any, including the impacts of those interventions, that supported the organization’s investment strategy in the event of a financial crisis.</li> </ul>	XX.18.4

1213 **References and resources**

1214 [GRI 201: Economic Performance 2016](#) lists authoritative intergovernmental instruments and  
 1215 additional references relevant to reporting on this topic.

1216 The additional authoritative instruments and references used in developing this topic, as well as  
 1217 resources that may be helpful for reporting on economic impacts by the capital markets sector, are  
 1218 listed in the [Bibliography](#).

## 1219 **Topic [XX].[19] Prevention of corruption and** 1220 **financial crime**

1221 **Anti-corruption refers to how an organization manages the potential of being involved with**  
1222 **corruption. Corruption is practices such as bribery, facilitation payments, fraud, extortion,**  
1223 **collusion, money laundering, or the offer or receipt of an inducement to do something**  
1224 **dishonest or illegal. Closely related to corruption, financial crime includes various forms of**  
1225 **theft and misuse for economic gain. This topic covers the impacts of corruption and financial**  
1226 **crime.**

1227 Losses from corruption are estimated to be worth over 5% of the annual global GDP, redirecting funds  
1228 from essential public services such as education and healthcare [174]. Organizations in the capital  
1229 markets sector may be involved with impacts related to corruption and financial crime through their  
1230 activities or as a result of their business relationships in all sectors of the economy.

1231 Organizations can become involved in corruption and financial crime through their connections to the  
1232 broader financial system and criminal activities targeting their clients. This can occur when workers  
1233 participate in illicit activities, such as market manipulation or exerting undue influence to attract clients  
1234 and secure business [175]. Additionally, misuse of assets by organizations can cause significant  
1235 losses for clients, such as through Ponzi schemes.

1236 Capital market organizations may be implicated in corruption and financial crime by facilitating capital  
1237 mobilization for illicit purposes or handling capital derived from illegal activities. Organizations can be  
1238 exploited to facilitate money laundering activities that fund crime, such as human trafficking and  
1239 terrorism [176], [177]. This involvement includes depositing illicit assets in capital markets and  
1240 establishing illegitimate businesses for investment. A lack of transparency surrounding financial flows  
1241 can further compound these problems [178]. Organizations can address the negative impacts of  
1242 money laundering by aligning with existing regulations and stakeholder initiatives [179].

1243 Regarding corruption and financial crime against clients, organizations can implement security  
1244 mechanisms to protect client assets and data [173] (see [topic XX.6 Client privacy and data security](#)).  
1245 These protection measures are increasingly important as cybercrime grows alongside the sector's  
1246 digitalization [180].

1247 Organizations can identify corruption and criminal activity by adopting suitable policies and  
1248 procedures that incorporate these three lines of defense: management controls, risk and compliance  
1249 oversight, and independent audit assurance [181]. These measures can consider where they do  
1250 business, their client base, products, and services, and how they obtain and retain business, including  
1251 their engagement with third parties. Regulations targeting financial crimes might require further  
1252 mitigation measures, including enhanced due diligence for politically exposed persons [182].

1253 Furthermore, the sector can address the negative impacts of corruption by participating in initiatives  
1254 on anti-bribery and corruption [181]. Through investee stewardship, organizations can encourage  
1255 existing or prospective investees to have robust anti-corruption policies and practices [183].

1256 **Reporting on prevention of corruption and financial crime**

1257 If the organization has determined prevention of corruption and financial crime to be a material topic,  
 1258 this sub-section lists the disclosures identified as relevant for reporting on the topic by the capital  
 1259 markets sector.

STANDARD	DISCLOSURE	SECTOR STANDARD REF #
<b>Management of the topic</b>		
<b>GRI 3: Material Topics 2021</b>	<p><a href="#">Disclosure 3-3 Management of material topics</a></p> <p><i>Additional sector recommendations</i></p> <ul style="list-style-type: none"> <li>For investee stewardship related to prevention of corruption and financial crime, report:               <ul style="list-style-type: none"> <li>agreed-upon targets related to investees' performance, along with metrics for evaluating progress;</li> <li>examples of outcomes of investee stewardship.</li> </ul> </li> </ul>	XX.19.1
<b>Topic Standard disclosures</b>		
<b>GRI 205: Anti-corruption 2016</b>	<p><a href="#">Disclosure 205-1 Operations assessed for risks related to corruption</a></p> <p><i>Additional sector recommendations</i></p> <ul style="list-style-type: none"> <li>Report operations assessed for risks related to financial crime.</li> </ul>	XX.19.2
<b>GRI 205: Anti-corruption 2016</b>	<p><a href="#">Disclosure 205-2 Communication and training about anti-corruption policies and procedures</a></p> <p><i>Additional sector recommendations</i></p> <ul style="list-style-type: none"> <li>Report communication and training about policies and procedures on the prevention of financial crime.</li> </ul>	XX.19.3
<b>GRI 205: Anti-corruption 2016</b>	<p><a href="#">Disclosure 205-3 Confirmed incidents of corruption and actions taken</a></p> <p><i>Additional sector recommendations</i></p> <ul style="list-style-type: none"> <li>Report the total number and nature of incidents related to financial crime, including:               <ul style="list-style-type: none"> <li>suspicious incidents identified;</li> <li>investigated incidents;</li> <li>confirmed incidents.</li> </ul> </li> </ul>	XX.19.4
<b>Additional sector disclosures</b>		
	Report the total monetary value of client funds lost to financial crime.	XX.19.5

1260 **References and resources**

1261 [GRI 205: Anti-corruption 2016](#) lists authoritative intergovernmental instruments and additional  
 1262 references relevant to reporting on this topic.

1263 The additional authoritative instruments and references used in developing this topic, as well as  
 1264 resources that may be helpful for reporting on prevention of corruption and financial crime by the  
 1265 capital markets sector, are listed in the [Bibliography](#).



1266

## Topic [XX].[20] Anti-competitive behavior

1267 **Anti-competitive behavior refers to actions by an organization that can result in collusion with**  
1268 **potential competitors, abuse of dominant market position, or exclusion of potential**  
1269 **competitors, thereby limiting the effects of market competition. This can include fixing prices**  
1270 **or coordinating bids, creating market or output restrictions, imposing geographic quotas, and**  
1271 **allocating customers, suppliers, geographic areas, or product lines. This topic covers impacts**  
1272 **as a result of anti-competitive behavior.**

1273 Fair, efficient, and competitive markets provide clients with a greater choice of quality financial  
1274 products and services while maintaining a higher quality of service [184] and more competitive pricing.  
1275 Competition is a fundamental principle for financial client protection [184]. Organizations in the capital  
1276 markets sector may be involved with impacts related to anti-competitive behavior through their  
1277 activities or as a result of their business relationships in all sectors of the economy.

1278 Organizations in the sector can be involved with anti-competitive behavior through collaborative  
1279 agreements with competitors, investment practices, and market concentration [185], [186]. Increasing  
1280 concentration in the sector now sees less than 2% of economic actors control up to 80% of economic  
1281 value, representing a 20% increase in capital concentration since the global financial crisis of 2008  
1282 [185]. By investing in already concentrated industries or organizations with dominant market positions,  
1283 organizations in the capital market sector can contribute to market concentration and monopolistic  
1284 practices. Certain investment strategies can support monopolies by focusing investments into  
1285 organizations that have dominant market positions which can limit growth opportunities and create  
1286 barriers to entry for potential competitors.

1287 Organizations can influence investees to undertake anti-competitive decisions, such as restricting  
1288 output, increasing prices [187], or pursuing mergers and acquisitions. These practices can result in  
1289 negative impacts related to industry concentration, eroding trust and confidence in the financial  
1290 system and potentially resulting in legal action against organizations. Through lobbying efforts,  
1291 organizations may also influence regulation to increase barriers to entry, further limiting competition  
1292 (see [topic XX.22 Public policy](#)).

1293 Organizations can implement policies, procedures, and functions to prevent, detect, and report anti-  
1294 trust and monopoly practices, which may be similar to those implemented for corruption and financial  
1295 crime (see [topic XX.19 Prevention of corruption and financial crime](#)). Robust global policies on anti-  
1296 trust and monopoly practices can ensure consistent application across activities and subsidiaries.  
1297 Additionally, specialized training for workers on anti-competitive behavior and clear guidelines about  
1298 collaboration and information exchanges can ensure that business units are aware of and comply with  
1299 relevant regulations. Through stewardship and engagement, organizations can encourage existing or  
1300 prospective investees to have robust anti-competition policies and procedures. Organizations may  
1301 also change governance bodies, oversight processes, and internal staffing structures to address anti-  
1302 competitive behavior.

1303 **Reporting on anti-competitive behavior**

1304 If the organization has determined anti-competitive behavior to be a material topic, this sub-section  
 1305 lists the disclosures identified as relevant for reporting on the topic by the capital markets sector.

STANDARD	DISCLOSURE	SECTOR STANDARD REF #
<b>Management of the topic</b>		
<b>GRI 3: Material Topics 2021</b>	<a href="#">Disclosure 3-3 Management of material topics</a> <i>Additional sector recommendations</i> <ul style="list-style-type: none"> <li>• Describe any investment policies that intend to limit market concentration.</li> <li>• For investee stewardship related to anti-competitive behavior, report:               <ul style="list-style-type: none"> <li>- agreed-upon targets related to investees' performance, along with metrics for evaluating progress;</li> <li>- examples of outcomes of investee stewardship.</li> </ul> </li> </ul>	XX.20.1
<b>Topic Standard disclosures</b>		
<b>GRI 206: Anti-competitive Behavior 2016</b>	<a href="#">Disclosure 206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices</a> <i>Additional sector recommendations</i> <ul style="list-style-type: none"> <li>• Describe the claims of the legal actions reported.</li> <li>• Describe the corrective measures taken in response to the legal actions for anti-competitive behavior, including:               <ul style="list-style-type: none"> <li>- changes to governance bodies and oversight processes;</li> <li>- restructuring with management, business units, or teams;</li> <li>- training for members of governance bodies, management, and workers.</li> </ul> </li> </ul>	XX.20.2

1306 **References and resources**

1307 [GRI 206: Anti-competitive Behavior 2016](#) lists authoritative intergovernmental instruments relevant to  
 1308 reporting on this topic.

1309 The additional authoritative instruments and references used in developing this topic, as well as  
 1310 resources that may be helpful for reporting on anti-competitive behavior by the capital markets sector,  
 1311 are listed in the [Bibliography](#).

## 1312 **Topic [XX].[21] Tax**

1313 **Organizations must adhere to tax legislation and align with stakeholder expectations on sound**  
1314 **tax practices. Aggressive tax strategies can deprive governments of revenue for implementing**  
1315 **public policy and investing in public services, undermining tax compliance more broadly. Tax**  
1316 **transparency promotes trust and credibility in an organization's tax practices and the tax**  
1317 **system. This topic covers the impacts of an organization's tax practices and the transparency**  
1318 **in implementing them.**

1319 Tax revenue plays a crucial role in financing public goods and services, supporting social protection  
1320 systems, and facilitating investments in public infrastructure [189]. In 2023, corporate profits estimated  
1321 at \$1 trillion were redirected to tax havens worldwide, with 25% of global offshore financial wealth  
1322 remaining untaxed [190]. Organizations in the capital markets sector may be involved with tax-related  
1323 impacts through their activities or as a result of their business relationships in all sectors of the  
1324 economy.

1325 In their tax practices, organizations may use legitimate tax structures, such as relocating profits to  
1326 mitigate tax liabilities [191] and structuring funds to avoid taxes, and illegitimate structures, such as  
1327 engaging in tax evasion. Some of these practices can significantly reduce government revenues,  
1328 particularly in low- and middle-income countries.

1329 Organizations in the capital markets sector play a crucial role in withholding tax on behalf of their  
1330 clients when investments yield profits. Due to its complexity, this responsibility is often delegated to  
1331 custodian banks, which can lead to errors, resulting in either over- or underpayment of taxes by  
1332 clients. Proactively managing withholding taxes allows asset managers to minimize discrepancies and  
1333 unlock benefits for their clients and themselves, ensuring more accurate and beneficial tax outcomes  
1334 [192].

1335 With their investees, organizations can systematically consider tax practices within investment  
1336 decisions and pursue ongoing stewardship and engagement with various actors, including investees,  
1337 policymakers, and other stakeholders [193]. This can include requesting transparent disclosure of an  
1338 investee's tax approach and payments and holding them accountable for questionable behavior that  
1339 may be motivated by tax reasons.

1340 As taxpayers, organizations in the capital markets sector are responsible for their own tax liabilities.  
1341 Therefore, they must adhere to tax legislation to fulfill their obligations to stakeholders and meet  
1342 sound tax practice standards. By transparently reporting their approach to tax, organizations can  
1343 disclose the use of legitimate tax structures and build trust with clients, tax authorities, and other  
1344 stakeholders.

1345 **Reporting on tax**

1346 If the organization has determined tax to be a material topic, this sub-section lists the disclosures  
 1347 identified as relevant for reporting on the topic by the capital markets sector.

STANDARD	DISCLOSURE	SECTOR STANDARD REF #
<b>Management of the topic</b>		
<b>GRI 3: Material Topics 2021</b>	<a href="#">Disclosure 3-3 Management of material topics</a> <i>Additional sector recommendations</i> <ul style="list-style-type: none"> <li>For investee stewardship related to tax, report:               <ul style="list-style-type: none"> <li>agreed-upon targets related to investees' performance, along with metrics for evaluating progress;</li> <li>examples of outcomes of investee stewardship.</li> </ul> </li> </ul>	XX.21.1
<b>Topic Standard disclosures</b>		
<b>GRI 207: Tax 2019</b>	<a href="#">Disclosure 207-1 Approach to tax</a>	XX.21.2
	<a href="#">Disclosure 207-2 Tax governance, control, and risk management</a> <i>Additional sector recommendations</i> <ul style="list-style-type: none"> <li>Describe how the organization's tax governance and control framework addresses the tax practices of its investees and, if applicable, custodian banks.</li> </ul>	XX.21.3
	<a href="#">Disclosure 207-3 Stakeholder engagement and management of concerns related to tax</a>	XX.21.4
	<a href="#">Disclosure 207-4 Country-by-country reporting</a>	XX.21.5

1348 **References and resources**

1349 [GRI 207: Tax 2019](#) lists authoritative intergovernmental instruments and additional references  
 1350 relevant to reporting on this topic.

1351 The additional authoritative instruments and references used in developing this topic, as well as  
 1352 resources that may be helpful for reporting on tax by the capital markets sector, are listed in the  
 1353 [Bibliography](#).

## 1354 **Topic [XX].[22] Public policy**

1355 **An organization can participate in public policy development, directly or through an**  
1356 **intermediary organization, by means of lobbying or making financial or in-kind contributions**  
1357 **to political parties, politicians, or causes. While an organization can encourage the**  
1358 **development of public policy that benefits society, participation can also be associated with**  
1359 **corruption, bribery, undue influence, or an imbalanced representation of the organization’s**  
1360 **interests. This topic covers an organization’s approach to public policy advocacy and the**  
1361 **impacts that can result from the influence an organization exerts.**

1362 Organizations in the capital markets sector may be involved with impacts related to public policy  
1363 through their activities or as a result of their business relationships in all sectors of the economy.

1364 Organizations can exert influence directly through financial support to political parties, election  
1365 campaigns, research initiatives, and think tanks [197] or indirectly through industry alliances and  
1366 affiliated associations. Revolving door practices can cause other negative public policy impacts when  
1367 organizations hire individuals previously employed by financial regulators [198]. This influence can  
1368 significantly shape public policy on a wide range of topics, including environmental policy and  
1369 customer protection, potentially leading to regulations that favor a select few organizations. This can  
1370 result in higher barriers to entry for competitors and unfair prices for financial products [199] (see [topic](#)  
1371 [XX.20 Anti-competitive behavior](#)), with far-reaching impacts that undermine the financial stability of  
1372 the broader economy (see [topic XX.18 Economic impacts](#)).

1373 Enhancing consistency and accountability regarding lobbying efforts can mitigate negative public  
1374 policy impacts, such as reporting meetings with regulators [198] and political contributions. This  
1375 includes reporting conflicts between an organization’s stated sustainability commitments and  
1376 opposing advocacy efforts [200] and avoiding ‘astroturfing’ tactics where a special interest group  
1377 backs false grassroots support for an issue. Transparency can also prevent conflicts of interest and  
1378 enable stakeholders to assess the influence organizations have on legislative decisions, policy-  
1379 making, and regulatory approvals.

1380 Organizations in the capital markets sector can further support public policy by engaging in debates  
1381 that positively shape sustainability frameworks across all sectors. This helps create additional  
1382 momentum for other sectors to fulfill environmental and human rights commitments while providing  
1383 additional certainty for allocating capital [200]. In addition, organizations can leverage their influence  
1384 to ensure their investees participate in public policy engagement in a manner that promotes  
1385 environmental and social responsibility. This can include stewardship of investees’ public policy  
1386 engagement and advocating for stronger alignment between those practices and sustainability  
1387 commitments [201].

1388 **Reporting on public policy**

1389 If the organization has determined public policy to be a material topic, this sub-section lists the  
 1390 disclosures identified as relevant for reporting on the topic by the capital markets sector.

STANDARD	DISCLOSURE	SECTOR STANDARD REF #
<b>Management of the topic</b>		
<b>GRI 3: Material Topics 2021</b>	<a href="#">Disclosure 3-3 Management of material topics</a>  <i>Additional sector recommendations</i> <ul style="list-style-type: none"> <li>• Describe the policy on employment and appointment of former public officials, or persons formerly entrusted with special public service functions, to the organization’s governing bodies.</li> <li>• Describe the policy on in-kind contributions for public officials or persons entrusted with special public service functions.</li> <li>• Describe the escalation policy for addressing misalignments between its representative associations or committees and its public policy stance.</li> <li>• For investee stewardship related to public policy, report:               <ul style="list-style-type: none"> <li>- agreed-upon targets related to investees' performance, along with metrics for evaluating progress;</li> <li>- examples of outcomes of investee stewardship.</li> </ul> </li> </ul>	XX.22.1
<b>Topic Standard disclosures</b>		
<b>GRI 415: Public Policy 2016</b>	<a href="#">Disclosure 415-1 Political contributions</a>	XX.22.2
<b>Additional sector disclosures</b>		
Report the resources allocated to public policy engagement, including the monetary value and percentage of budgetary allocations.		XX.22.3

1391 **References and resources**

1392 [GRI 415: Public Policy 2016](#) lists authoritative intergovernmental instruments relevant to reporting on  
 1393 this topic.

1394 The additional authoritative instruments and references used in developing this topic, as well as  
 1395 resources that may be helpful for reporting on public policy by the capital markets sector, are listed in  
 1396 the [Bibliography](#).

1397

# Glossary

1398 This glossary provides definitions for terms used in this Standard. The organization is required to  
1399 apply these definitions when using the GRI Standards.

1400 The definitions included in this glossary may contain terms that are further defined in the complete  
1401 [GRI Standards Glossary](#). All defined terms are underlined. If a term is not defined in this glossary or in  
1402 the complete *GRI Standards Glossary*, definitions that are commonly used and understood apply.

1403

- 1404 • anti-competitive behavior
- 1405 • anti-trust and monopoly practice
- 1406 • basic salary
- 1407 • benefit
- 1408 • business partner
- 1409 • business relationships
- 1410 • child
- 1411 • collective bargaining
- 1412 • conflict of interest
- 1413 • corruption
- 1414 • direct (Scope 1) GHG emissions
- 1415 • discrimination
- 1416 • due diligence
- 1417 • effluent
- 1418 • employee
- 1419 • energy indirect (Scope 2) GHG emissions
- 1420 • forced or compulsory labor
- 1421 • freedom of association
- 1422 • governance body
- 1423 • greenhouse gas (GHG)
- 1424 • hazardous waste
- 1425 • human rights
- 1426 • impact
- 1427 • indigenous peoples
- 1428 • infrastructure
- 1429 • local community
- 1430 • marketing communication
- 1431 • material topic
- 1432 • mitigation
- 1433 • occupational health and safety management system
- 1434 • other indirect (Scope 3) GHG emissions
- 1435 • political contribution
- 1436 • product and service information and labeling
- 1437 • remedy / remediation
- 1438 • remuneration
- 1439 • reporting period
- 1440 • scope of GHG emissions
- 1441 • senior executive
- 1442 • severity
- 1443 • stakeholder
- 1444 • substantiated complaint
- 1445 • supplier
- 1446 • supply chain
- 1447 • sustainable development / sustainability

- 1448 • value chain
- 1449 • vulnerable group
- 1450 • waste
- 1451 • water consumption
- 1452 • water stewardship
- 1453 • water stress
- 1454 • water withdrawal
- 1455 • worker
- 1456 • worker representative
- 1457 • work-related hazard
- 1458 • work-related incident
- 1459 • work-related injury or ill health

Exposure draft for public comment



# 1460 Bibliography

1461 This section lists authoritative intergovernmental instruments and additional references used in  
1462 developing this Standard, as well as resources that the organization can consult.

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