

An aerial, high-angle photograph of a diverse group of people standing on a grey floor. They are interconnected by a network of thin white lines that form a complex web. The people are dressed in various casual and semi-formal attire, representing a wide range of ages and ethnicities. The lighting is bright, casting long, soft shadows from the individuals onto the floor. The overall composition suggests a global or community network.

What's the
Matter with

DEI?

A Reset



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Founded in 2018, Rights CoLab is an experimental platform for expert-level collaboration across the fields of civil society, business, and finance. Rights CoLab develops and drives new approaches that leverage markets to advance human rights in the face of today's urgent challenges.

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Executive Summary

Businesses in the US and Europe face a fragmented landscape for advancing diversity, equity and inclusion (DEI) objectives. While an anti-ESG backlash in the US that had DEI opposition at its core had already been building for several years, in 2025 the Trump administration aggressively targeted these efforts across government, universities, and corporations through executive orders and legal actions—reducing disparate impact enforcement and framing DEI efforts as an “identity-based spoils system” that undermines meritocracy.¹ These actions have reverberated globally, creating “complications” for human resource officers who are reportedly “vexed” by how to respond to diverging expectations.²

This framing creates a false dichotomy. A meritocratic environment is one in which effort and competence are rewarded, but achieving this requires fair access to opportunities and a level playing field for all.³ Dismantling longstanding biases that privilege certain backgrounds and entrench unequal access is essential to building such an environment. Businesses are neither obligated nor always best positioned to remedy historical injustices, but they can—and, indeed, should in their own interest—avoid perpetuating them. For companies and entire economies to thrive, they must draw from the widest possible talent pool.

In the US, companies began building DEI programs as far back as the 1960s, following the Civil Rights Act of 1964, although the DEI acronym is more recent. In the early days, the purpose of these programs was explicitly to undertake proactive initiatives that remove barriers to employment and advancement for individuals from historically marginalized communities. Yet the current polarized political climate has upended confidence in what these efforts are even aiming to achieve, let alone in their ability to deliver truly merit-based and successful workplaces.

This report charts a DEI Roadmap for businesses navigating today’s polarized political and business landscape—and for investors tracking it closely—with a focus on practices that manage financial risk and opportunity across the employee lifecycle, from talent attraction and retention to performance management. The Roadmap covers 16 essential topics for building a non-discriminatory workplace that mitigates risk and creates value. It pinpoints where past DEI approaches fell short while defining the conditions for a fair, equitable, meritocratic culture that attracts and retains top talent of any demographic amid fierce competition. In doing so, it offers a DEI “reset,” cutting through the noise to guide businesses on true priorities—rehabilitating DEI through a fundamental re-conception and reprioritization of actions, regardless of acronym.

We developed this Roadmap through desk research, discussions with DEI specialists, a literature review, and our own professional experience—including insights from our 2022 report, [What is DEI? Market Signals of Diversity, Equity and Inclusion](#), a comprehensive review of indicators within sustainability frameworks used by investors and companies. To better understand prevailing messaging around DEI, for this report we analyzed indicators across 35 influential frameworks to assess how they address—or overlook—the Roadmap topics. This report presents the findings of that analysis and highlights the indicators leveraged for the Roadmap.

DEI Roadmap

16 essential topics for building a non-discriminatory workplace that mitigates risk and creates value

Topic

Actions to Take*

Category 1: Governance and Accountability

1. Anti-Discrimination Policy

- / Develop or update your anti-discrimination policy to cover commitments to carry out all aspects of this Roadmap
- / Assign senior management and a board committee to oversee the policy
- / Clearly communicate the policy to all workers and provide opportunities for workers to engage with it
- / Extend all commitments to include contingent workers
- / Include a commitment to rigorously assess as unbiased any AI tools used in hiring, promotion, and dismissal

2. Board Oversight

- / Task the board with assessing progress against your anti-discrimination policy based on senior management reports
- / Create and annually update a board competencies matrix; use it to inform recruiting needs, screening, and interviews; consider adding one or more worker representatives to the board
- / Incorporate DEI performance into the board's annual performance review

Category 2: Hiring, Promotion, Dismissal

3. Hiring Process: Job Announcement

- / Analyze job description language and requirements to ensure they are inclusive and equitable
- / Debias job descriptions by using gender-neutral position titles and pronouns, avoiding or balancing gendered terms, using accessible language, ensuring qualifications are job-related, and clearly delineating between absolute job requirements versus "nice to have" requirements, removing unneeded academic and professional degree requirements for all roles, not just entry-level roles
- / To cast the net wide, engage non-profits that can assist with outreach to typically hard-to-reach and marginalized groups

Topic	Actions to Take*
4. Hiring Process: Screening	<ul style="list-style-type: none"> / Only use AI-enabled resume screening tools that the company has assessed via formal audits as safe from bias / Provide reasonable accommodations for candidates with disabilities. / Aim for an inclusive interview panel that has received quality anti-bias training
5. Promotion Process: Performance Assessment	<ul style="list-style-type: none"> / Standardize performance review procedures for all workers ensuring they are skills-based and consistently applied across the company / Ensure that all workers have access to the procedures and an opportunity for performance assessment and advancement / Provide and communicate an accessible appeals process / Create career ladders with job competencies for all job types and levels
6. Dismissal Process	<ul style="list-style-type: none"> / Standardize dismissal procedures for all workers that clearly articulate the valid reasons for termination, warning and termination procedures for each reason, and safeguards against wrongful termination / Ensure that all workers are aware of the procedures / Provide and communicate an accessible appeals process / Avoid automated/AI-enabled work termination decisions and processes

Category 3: Equitable and Inclusive Workplace

7. Pay Equity between Identity Groups	<ul style="list-style-type: none"> / Assess the gender and racial pay gap for employees and contingent workers in “significant locations” of your global operations / Have the pay gap data independently verified / Create a plan to reduce the pay gaps with time-bound targets and progress indicators toward them / Make compensation adjustments when pay gaps are identified / Take preventative measures by prohibiting hiring managers from asking candidates about salary history and standardizing pay ranges for job levels
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Topic	Actions to Take*
8. Family Care Leave	<ul style="list-style-type: none"> / Put in place a family leave policy for all workers, including contingent workers and workers in atypical families / Track workforce family leave uptake and identify and close gaps in efforts to equally encourage all workers to take it
9. Career Development	<ul style="list-style-type: none"> / Develop mentoring programs, leadership coaching, and access to professional networks that are widely communicated and accessible to all workers / Track which workers actually participate in training and mentoring programs, paying special attention to underrepresented groups / Hold leaders accountable for fostering a culture of career development
10. Reasonable Accommodations	<ul style="list-style-type: none"> / Provide reasonable disability and gender-aware accommodations to all workers at the point of recruitment and throughout the employment lifecycle / Ensure the accessible design of company workspaces and consider allowing hybrid work arrangements / Make it easy for people with disabilities or gender-specific needs to request the tools, resources, and physical spaces they need to do their jobs / Do not overlook the needs of trans people, including trans-inclusive restroom/facilities policy, particularly given their heightened vulnerability

Category 4: Fostering Worker Security

11. Living Wage	<ul style="list-style-type: none"> / Pay a living wage / Regularly conduct a living wage assessment, preferably by a third party and using a robust methodology, such as MIT Living Wage Calculator, Anker, and Wage Indicator / Put in place a plan to close any living gap, including for contingent workers
12. CEO-Worker Pay Gap	<ul style="list-style-type: none"> / Examine the annual total compensation and the ratio of the annual increase in total compensation for the company's highest-paid individual to the median annual total compensation and median percentage increase for all employees

Topic	Actions to Take*
	<ul style="list-style-type: none"> / Integrate equitable compensation practices into executive pay design / Consider expanding worker ownership
13. Social Protection	<ul style="list-style-type: none"> / Assess the significant locations of operations for whether basic benefits—medical and health insurance, paid sick leave and paid family leave disability, retirement—are covered by existing government social protection programs / In a timely manner, devise programs to provide benefits that address identified social protection gaps in those locations and widely publicize the offering to all workers
Category 5: DEI Health Check	
14. Incident Reporting Mechanism	<ul style="list-style-type: none"> / Establish and maintain an incident reporting channel that is characterized by anonymity, safety, protections against complainant retaliation, and survivor-centered design / Establish a grievance mechanism that meets the UNGP 31** effectiveness criteria and enables effective remediation / Track and analyze the effectiveness of incident reporting channels
15. Complaints & Controversies	<ul style="list-style-type: none"> / Track and systematically analyze discrimination-related complaints by location for change over a time / Analyze the timeliness and effectiveness of actions taken, and develop and implement an improvement plan
16. Discrimination Risk Management	<ul style="list-style-type: none"> / Track demographics and regularly analyze trends for: <ul style="list-style-type: none"> » lagging promotions and internal hires » voluntary and involuntary exits / Conduct employee engagement surveys and in-depth exit interviews to measure organizational culture and its inclusive character / Monitor program elements—Roadmap Topics 2-13—to ensure they are working effectively and take actions where necessary

* See Appendix 1 for the indicators that informed the “Actions to Take.”

** See [OHCHR Accountability and Remedy Project: Meeting the UNGPs’ Effectiveness Criteria](#)

Frameworks covered in this analysis

This report covers 35 publicly available frameworks, referred to according to the short-form identifiers, below. While they vary in scope and purpose, each framework is designed, in whole or in part, to assess private sector management, policies, processes, and performance on DEI. The frameworks are created and maintained by a diverse array of organizations, including non-profits, standard-setting institutions, industry coalitions, and Environmental, Social and Governance (ESG) rating and data providers. Reflecting the distinct missions of these organizations, the frameworks serve different purposes. Appendix 2 provides a description of each framework and identifies the components used in this analysis.

/ AIMA & Albourne Diversity and Inclusion Questionnaire, 2020	AIMA & Albourne
/ As You Sow Racial Justice Scorecard, 2024	AYS Race
/ As You Sow & Whistlestop Capital Workplace Equity Scorecard, 2025	AYS & WSC
/ B Lab Standards v2, 2025	B Lab
/ Bloomberg Gender-Equality Index, 2022	Bloomberg
/ Business for Inclusive Growth Just Transition Indicators, 2023	B4IG
/ Policy Link, FSG & JUST Capital Corporate Racial Equity Alliance Draft Standards, 2024	CREA
/ ESG Data Convergence Initiative Metrics, 2026	EDCI
/ Coalition for Inclusive Capitalism Embankment Project for Inclusive Capitalism Report, 2018	EPIC
/ Equileap Gender Equality Scorecard, 2016	Equileap
/ EFRAG European Sustainability Reporting Standard Draft, 2025	ESRS
/ Global Impact Investing Network IRIS + Standards, 2025	GIIN IRIS+
/ GRI Universal Standards, 2021 and Labor Topic Standards Exposure Drafts, 2024-2025	GRI
/ Human Capital Management Coalition Four Foundational Disclosures, 2020	HCMC
/ Human Rights Campaign Foundation Corporate Equality Index, 2025	HRC CEI
/ Impact Investing Institute Just Transition Criteria, 2023	III
/ ILPA Due Diligence Questionnaire 2.0, 2021	ILPA
/ IFC ESG Performance Indicators, 2021	IFC
/ IFRS Foundation SASB Standards, 2023	SASB
/ ILO Global Business and Disability Network Model Self-Assessment Tool, 2022	ILO-GBDN
/ Just Capital Corporate Racial Equity Tracker, 2022	JUST Capital
/ MSCI Workforce Gender Diversity, 2023	MSCI Gender
/ MSCI US Racial and Ethnic Diversity Dataset 2022	MSCI Race
/ Oxfam America Corporate Inequality Framework 2024	Oxfam CIF
/ Refinitiv Diversity Inclusion Ratings 2023	Refinitiv
/ The Social Investment Consultancy and EIRIS Foundation Racial Equity Scorecard, 2024	TSIC & EIRIS RES
/ UNRISD Performance Indicators, 2022	UN RISD SDPI
/ UN Women & UN Global Compact Women's Empowerment Principles, 2017	WEP
/ UNCTAD Core Indicators for Sustainability and SDG Impact Reporting, 2023	UNCTAD
/ UN Women & UNEP FI Gender Equality and Empowerment of Women, 2024	GEWE
/ Workforce Disclosure Initiative Survey, 2025	WDI
/ World Benchmarking Alliance Digital Inclusion Benchmark, 2026	WBA Digital
/ World Benchmarking Alliance Corporate Human Rights Benchmark, 2023	WBA CHRB
/ World Benchmarking Alliance Social Transformation Baseline Assessment, 2021	WBA Social
/ World Benchmarking Alliance Gender Benchmark, 2023	WBA Gender

Introduction

DEI has its origins in the US civil rights movement and the 1964 Civil Rights Act, when companies began to put in place equal employment opportunities or affirmative action plans. Over the past decade, in response to affirmative action pushback that began in the 1980s during the Reagan era, and later with the rise of social equality movements, the term DEI became popular in business circles and a staple of public debate not only in the US, but also in Europe and beyond.

With studies pointing to clear advantages for businesses with diverse workforces,⁴ including a widely cited, though discredited, series of reports by McKinsey & Company,⁵ stakeholder pressures for companies to adopt DEI programs grew rapidly. An accompanying trend in large companies and public entities in the US and Europe was the evolution of DEI from a niche human resources function to a central strategic pillar—sometimes as part of a company’s broader sustainability strategy, and often accompanied by the appointment of a chief diversity officer.⁶

Accelerated by the #MeToo and Black Lives Matter movements and by increasing investor pressure,⁷ companies worldwide faced growing expectations to demonstrate progress in creating diverse workplaces, where women and minorities would be safe from exploitation and have equal access to employment opportunities, including positions of power. That pressure led to regulations, particularly in Europe, such as the 2022 directive on gender balance of directors in listed companies,⁸ the 2023 directive on equal pay between men and women,⁹ and the Corporate Sustainability Reporting Directive (CSRD), which includes workforce diversity and equal treatment within the “Own Workforce” standards.¹⁰

In the US, as Biden Administration policies advanced DEI in the federal workforce,¹¹ polls consistently showed majority support for DEI efforts in the private sector. A September 2022 GoodHire survey found 81% of workers would consider leaving their job if their employer lacked a DEI commitment, with 54% (66% among leaders) willing to take a pay cut for better workplace DEI.¹² A June 2024 Washington Post-Ipsos poll found that 61% of respondents said that “diversity, equity, and inclusion programs” were a good thing—rising to 69% with the definition, “programs to hire more employees from groups that are underrepresented in their workforce, such as racial and ethnic minorities and people with disabilities and to promote equity in the workplace.”¹³ JUST Capital’s November 2024 survey showed even stronger backing: 92% of Americans said it was important for companies to promote racial equity in the workplace.¹⁴



Despite the business and societal embrace of DEI, measuring progress remained a challenge, marked by the proliferation of frameworks and only partial consensus on core definitions and metrics. This was a key finding of a Rights CoLab 2022 report, [What is DEI? Market Signals of Diversity, Equity and Inclusion](#), which analyzed 21 influential frameworks containing a total of 428 DEI metrics across 12 DEI themes.¹⁵ A response to growing investor demand for greater DEI disclosure, the report contributed to the debate on the metrics businesses and investors rely upon to measure performance in this important area in order to achieve delivery on these goals. It shed light on common core understandings of DEI and significant differences in how DEI is conceptualized, measured, and managed.

The research found that overall organizations emphasized indicators that focused on diversity—the demographic differences between members of an organization in terms of observable (e.g., gender, age, race, etc.) and non-observable (e.g., sexual orientation, religion, mental/physical ability) characteristics—over the equity (justice, fairness) and inclusion (sense of belonging) aspects of DEI.¹⁶ There was a high percentage of representation indicators—in other words, indicators calling for quantitative data on hiring, promotion, and turnover of employees at all levels, disaggregated by one or more demographic characteristics. Disaggregation by gender was the most common, followed by disaggregation by race and ethnicity, LGBTQ identity, disability status, and history of incarceration. The present study finds that this trend has persisted. Across the 15 general frameworks of our 2022 tracker—i.e., the social sustainability frameworks that are not dedicated to a specific marginalized group, such as women—56% of DEI-related metrics were representation metrics. By the end of 2025, the percentage of representation metrics within the 22 general frameworks in our updated tracker rose to 63%.¹⁷

Representation Indicators in the General Frameworks		
	2022	2025
Total no. of indicators	240	291
No. of representation indicators	134	182
Percentage of representation indicators	56%	63%

It has been argued that the emphasis on diversity over equity and inclusion may have led to the DEI backlash that reached an apex in 2025. Edmans, Flammer, and Glossner point to the need for a rebalance, writing that, “Reducing DEI to diversity is often motivated by the ease of measuring the latter. However, it is problematic if diversity



bears little correlation with equity and inclusion (EI), and if EI is a stronger predictor of company performance than diversity.”¹⁸ Other studies provide evidence that a workforce culture that values inclusion is a competitive advantage.¹⁹

This report—aimed at investors and companies—seeks to reset DEI by proposing a Roadmap for finding clear direction amid a polarized landscape. With this Roadmap, companies can build fair, inclusive workplace cultures that respond to the interests of diverse investors, employees, and other stakeholders while reducing legal risk. We cut through the noise by taking a clear position grounded in human rights: companies must uphold the right to freedom from discrimination, as affirmed by the International Bill of Rights, the ILO core labor standards, and domestic laws worldwide.

The report is organized into two parts. First, we examine the political context in which global companies are shaping their positions on DEI. Second, we introduce the Roadmap comprising 16 topics across five categories: (1) Governance and Accountability, (2) Hiring, Promotion, and Dismissal, (3) Equitable and Inclusive Workplace, (4) Fostering Worker Security, and (5) DEI Health Check. For each topic, we assess how existing metrics and indicators address it and identify those that most effectively capture its substance—or overlook it altogether.

BOX 1. A Conditional Business Case: The Equity and Inclusion Factor in DEI Success

The academic literature presents a complex picture of the business case for DEI. For the purposes of this report, “diversity” is defined as the demographic differences in the workforce of an organization in terms of characteristics (usually protected by law); “inclusion” is about an individual’s sense of belonging, recognition, and psychological safety;²⁰ while “equity” aims to promote justice, fairness.²¹

Some studies point to the benefits of diversity in the workplace. Large sample and meta-analyses generally find small-to-moderate positive links between a well-managed and diverse workforce and productivity, innovation, and company value. But these benefits depend heavily upon the organization itself and how it puts its DEI strategy into practice. A 2024 study in *Academy of Management Proceedings*, for example, finds that having a mix of ages, genders, education levels, and ethnic backgrounds in the workforce is linked to higher productivity, with differences in education having the strongest effect and results varying significantly across countries and industries.²²



At the same time, other studies document that a higher level of diversity can increase interpersonal conflict, reduce cohesion, and raise turnover and absenteeism when it is not paired with strong diversity management, inclusive norms, and fair practices.²³

Research on inclusive leadership shows that leaders who invite input, treat people fairly, and foster psychological safety enable individuals and teams to be more innovative, with psychological safety serving as a key link between inclusion and better ideas.²⁴ A study from the food and beverage industry demonstrates that everyday inclusion practices matter more than demographics alone and point to the importance of organizational culture.²⁵ Diverse teams, when well-managed, can draw on a wider range of information, come up with more creative solutions, and better understand varied customer groups, while inclusive cultures and good workplace ethics practices tend to reduce turnover and absenteeism and boost employee engagement, all of which support performance over time.²⁶

Research that examines how employees experience fairness, inclusion, and opportunity finds that companies with higher equity and inclusion scores tend to be more profitable and have higher market valuations.²⁷ This suggests that to some extent investors recognize the value that inclusive workplaces create.

Overall, the literature supports a conditional business case where diversity alone—without equity, inclusion, or skillful management of power and conflict—is insufficient to enable the benefits of diversity and collective creativity to be fully realized. In contrast, carefully designed and truly inclusive DEI systems tend, on balance, to correlate with stronger innovation, improved productivity, and improved financial performance over the long run.



The DEI backlash and the business response

The politicalization of DEI in the US

The backlash to DEI gained momentum in 2022, later spreading to Europe amid the Trump Administration’s crackdown. When the US Supreme Court ruled in June 2023 that the affirmative action programs used in college admissions violate the Equal Protection Clause of the 14th Amendment, it added fuel to the anti-DEI movement by bolstering the argument that DEI initiatives risk “reverse discrimination.”²⁸ By mid-2025 as many as 15 states—including Florida, Texas, Alabama, South Dakota, Oklahoma, and Utah—had passed anti-DEI laws that prohibited funding for DEI offices, training, and diversity statements, restricted critical race theory and gender teaching, banned LGBTQ clubs and initiatives at public universities, and introduced anti-trans bathroom restrictions.²⁹ One of the first legislative maneuvers by Florida Governor Ron Desantis, the 2022 Stop Wrongs to Our Kids and Employees Act (commonly known as the Stop WOKE Act) was challenged in a US district court, where the judge ruled that parts of the law related to workplace training are unconstitutional.³⁰ In 2023, an appeals court upheld that decision, deciding that the law would violate the First Amendment rights of businesses.

This turmoil served as the preamble to a key policy priority of President Trump’s second term. On Inauguration Day, January 20, 2025, he signed Executive Order 14151, “Ending Radical and Wasteful Government DEI Programs and Preferencing,” which controversially deemed it “illegal” for executive agencies to promote diversity or implement preferential hiring for historically underrepresented groups (the affirmative action component of some DEI initiatives).³¹ While executive orders cannot override statutory law and therefore the illegality declaration is only rhetorical by creating a policy directive that challenged the legal foundations of DEI programs, EO 14151 nonetheless marked an inflection point for US companies. The next day, President Trump signed Executive Order 14173, “Ending Illegal Discrimination and Reporting Merit-Based Opportunity,” targeting the private sector by barring companies with DEI programs from federal contracts.³²

In the months following, the Trump administration’s resolve hardened. In late May it announced that it would not pay state and local agencies to process civil rights claims of discrimination involving transgender workers based on “disparate impact,” reviving the substance of a Trump 2020 Executive Order that President Biden had rescinded upon taking office.³³ This announcement followed an EO the previous month to curtail



the use of disparate-impact liability—a core tenet used for decades to enforce the Civil Rights Act of 1964 by determining whether policies disproportionately disadvantage certain groups—undermining the Civil Rights Act itself.³⁴ These measures align with the Project 2025 playbook published by the Heritage Foundation, which has a stated objective of infusing the federal government with Christian Nationalism.³⁵

Whether or not Christian Nationalism motivated the anti-DEI government policy, each effort has framed the “DEI problem” as sowing division, implicitly by discriminating against white men.³⁶ This characterization of DEI has taken hold, extending beyond partisan rhetoric. A May 2025 New York Times article on the Trump administration’s plan to curtail disparate-impact liability against different groups unwittingly defines DEI as “a catchall term increasingly used to describe policies that benefit anyone who is not white and male.”³⁷ In February 2026 when the paper reported on The Equal Employment Opportunity Commission’s decision to investigate Nike for discrimination against white workers, there was a strong online reaction by users expressing support for the investigation.³⁸

The business response

In 2025, many companies responded to the executive actions by folding. On April 11, Forbes released a compilation of 42 companies that had rolled back their DEI programs since July 2024.³⁹ The list included financial services firms like Goldman Sachs, State Street, and JP Morgan Chase, retailers like Target and Walmart,⁴⁰ food and beverage companies such as Coke, Pepsi, and McDonalds, and tech companies such as Google and its parent company Alphabet.

The news marked a sea change in corporate attitudes toward DEI from just three years earlier. However, what soon became clear was that winding down DEI initiatives could adversely impact business performance.⁴¹ When Target announced in January the end of its three-year DEI goals—halting reports to groups like the Human Rights Campaign and ending a program to increase products from minority-owned businesses—the consequences were swift. Consumers, led by the People’s Union USA, mobilized boycotts. As a result, Target’s store visits fell below 2024 levels for all but two weeks over the next 22 weeks, with a year-over-year decline of 3.9% by June, according to analytics firm Placer.ai.⁴² Moreover, it contributed to the collapse of Target’s stock price throughout 2025.⁴³ In contrast, Costco, which publicly proclaimed its dedication to its DEI initiatives, saw an increase in foot traffic.⁴⁴

On June 11, 92% of Target shareholders rejected an anti-DEI proposal, aligning with the board’s recommendation.⁴⁵ Similarly, shareholders at 30 major companies—



including American Express, Apple, Berkshire Hathaway, Boeing, Coca Cola, Costco, John Deere, Disney, and Pfizer—defeated such measures. There are many reasons why shareholders might withhold support for a shareholder proposal. DEI advocates, such as Rutgers law professor Matteo Gatti, argued the votes signaled investors’ view of rigid anti-DEI positions as financially imprudent,⁴⁶ while As You Sow’s Andrew Behar called the 2025 proxy season “a validation of diversity as a business principle.”⁴⁷ Yet mainstream investor sentiment is complex, particularly as investors themselves have encountered right-wing criticism, as discussed below.

Companies have remained cautious about publicly promoting their DEI activities in the current environment. Some scaled back or reframed commitments. For example, Nissan declined to sponsor June Pride Celebrations—a demonstration of support for LGBTQ+ rights—as it had in the past, while Target made a donation but requested that it not be publicized.⁴⁸ By mid year, news headlines announced that companies that had rolled back DEI policies were quietly bringing them back.⁴⁹ Others reported that firms are simply avoiding the language of DEI: according to Law360, more than half of companies in the Russell 3000 index continue to build and expand DEI-related programs using different language.⁵⁰

The investor response

In the US, since 2022 investors have faced direct legal challenges from Republican-led states for considering issues like climate change and DEI, with pressure intensifying after the 2024 presidential election. Over 20 states, including Texas, Florida, and Indiana, passed laws mandating divestment from large asset managers like BlackRock, Vanguard, and State Street if they prioritize ESG (including DEI) in proxy voting or “boycott” fossil fuels, prompting billions in state-level divestments by mid-2025.

Texas Attorney General Ken Paxton sued BlackRock, Vanguard, and State Street in November 2024, alleging that an anticompetitive “investment cartel” was suppressing coal output through ESG stewardship.⁵¹ Separately, in *Spence v. American Airlines* (N.D. Tex. 2024), an employee sued under ERISA, alleging BlackRock’s “non-pecuniary” ESG activism tainted 401(k) fiduciary decisions. A federal judge found a breach of loyalty, reasoning that the company’s ESG goals had “improperly tainted” oversight, but found no breach of prudence and awarded no damages. In later proceedings, the plaintiffs received attorney’s fees based on the company’s “sufficient culpability,” though no damages were awarded.⁵²

These pressures prompted widespread investor caution: US asset managers sharply cut support for ESG/DEI proposals, correlating with S&P 500 firms reducing “DEI”



mentions in 10-Ks by 50% from 2023–2025 and rebranding as “talent management.” Meanwhile, ESG funds saw an estimated \$62-84 billion in outflows in 2025.⁵³

The legal battles continue: BlackRock, Vanguard, and State Street filed appeals and amicus briefs claiming harm to fiduciary duties; BlackRock countersued Texas over divestment losses. Vanguard settled the coal suit for \$29.5M in February 2026, but the BlackRock and State Street cases persist.⁵⁴ ISS/Glass Lewis blocked Texas’s ESG proxy law on First and Fourteenth Amendment grounds (pending appeal), while 17 Democratic Attorneys General urged ERISA protections for ESG. As a result, investors and companies both face sharply rising compliance costs from suits, divestments, and policy shifts.⁵⁵

The view from Europe

Investors and global companies must also navigate this issue in other jurisdictions that place an emphasis on diversity and inclusion outcomes as part of responsible and sustainable business conduct. For DEI specifically, there may be conflicting regulatory requirements depending on jurisdiction. In contrast to the US approach to affirmative action, which now emphasizes voluntary, flexible measures to promote equal opportunity, European approaches often incorporate mandatory quotas, particularly for gender, with stronger legal backing for positive action to address underrepresentation.⁵⁶ For example, German corporate law expressly mandates gender diversity quotas for supervisory boards and requires establishing gender diversity targets for executive boards and management levels below the executive board.

Furthermore, the EU Pay Transparency Directive, adopted in April 2023, is aimed at advancing gender pay equity. The Directive requires EU companies to disclose pay information and address gender pay gaps exceeding 5%. It grants rights for workers to request individual and average pay data for equivalent roles and ensures companies publicly report pay gaps, with penalties for non-compliance.⁵⁷

Notably, companies based outside the US but with significant operations in the US, such as L’Oréal and BMW, did not retreat from their DEI commitments. According to Paul Klein, founder of the Impakt Foundation for Social Change, these companies view DEI “not as a social obligation or political risk, but as a strategic imperative that contributes to long-term business success.”⁵⁸

Nonetheless, Europe has not been immune to the anti-DEI currents originating in the US, which have reverberated beyond its borders. European companies have lobbied to scale back aspects of the EU CSRD, in part by advocating for simplification of the European Sustainability Reporting Standards (ESRS) to reduce reporting burdens.



Corporate lobbying contributed to the European Commission’s Omnibus legislation, which streamlined certain sustainability reporting requirements, narrowed the scope to large companies—removing around 80% of previously in-scope entities—and extended the deadline for initial corporate reports. In this process, the metric asking whether companies have “specific policies aimed at the elimination of discrimination, including harassment, promoting equal opportunities and other ways to advance diversity and inclusion” was removed, which may be a sign of de-prioritization of this topic among European market actors. The Omnibus reforms also significantly narrowed requirements to report on non-employee or contingent workers, an issue we return to later in this report.

Rising polarization

The pressure on companies in the US—both domestic and foreign—intensified throughout 2025 when the Trump administration threatened to block government contracts and derail merger approvals for firms seen as too “woke.” Corporate responses varied based on each company’s risk tolerance—which might reflect a company’s level of commitment to DEI at the board level.

For instance, on May 19, Verizon eliminated its DEI policy, scrubbed DEI references from training materials and websites, ended bonuses and goals tied to increasing women and minority representation, and dissolved its DEI-focused HR division. The next day, after notifying the Federal Communications Commission (FCC) of these changes, the agency approved Verizon’s \$20 million acquisition of Frontier Communications.⁵⁹ Politically, rollbacks like Verizon’s also reflect the success of a well-funded campaign by conservative activist Robby Starbuck pressuring major US companies to dismantle DEI programs.⁶⁰

The administration’s anti-DEI efforts also faced setbacks in 2025. On June 9, a California federal judge blocked enforcement of EOs targeting diversity and transgender inclusion,⁶¹ affirming the government’s limited authority and signaling that companies like Costco could sustain public DEI support. Still, Washington’s firm anti-DEI stance emboldened private opposition groups and eroded some corporate commitment; in 2026, Goldman Sachs dropped race, gender, and other diversity factors from candidate evaluations following pressure from the conservative National Legal and Policy Center (NLPC).⁶²

The DEI backlash is producing tangible consequences in the US, particularly for women. One signal is the erosion in US companies’ performance on Equileap’s gender equality benchmark: despite comprising roughly half of developed-market firms, the



number of US companies in the top 100 has fallen to just 7 in 2026, down from 17 in 2023, 15 in 2024 and 11 in 2025.⁶³ Federal workforce reductions tied to budget cuts and the dismantling of DEI programs deemed misaligned with the administration's priorities hit Black women especially hard: according to New York Times reporting on US Bureau of Labor Statistics data, around 300,000 Black women left the workforce between April and July 2025, with knock-on effects for the wider economy.⁶⁴ Gender economist Katica Roy estimates that every 1% decline in women's labor force participation costs the US approximately \$146 billion in GDP, underscoring the scale of these losses.⁶⁵

In this polarized political environment, business ambivalence is unsurprising. Companies must navigate not only the legal constraints of the jurisdictions in which they operate but also the broader sociopolitical landscape, particularly when they do business with government agencies and departments advancing political agendas. Nonetheless, anti-discrimination efforts remain essential for a healthy and resilient workplace and in turn a successful and sustainable business outlook.⁶⁶ There is a clear need for a DEI reset.



DEI Indicators for Resilient Businesses

Against this backdrop, we present this DEI Roadmap for global companies operating in the US and Europe to create more resilient, fair, and inclusive workplaces while avoiding legal risk. For investors, the Roadmap offers actionable benchmarks to evaluate portfolio companies' workforce management and sharpen due diligence on discrimination risks.

The Roadmap consists of 16 topics spanning the following five categories that capture the full employee experience:

- Category 1:** Governance and Accountability
- Category 2:** Hiring, Promotion, and Dismissal
- Category 3:** Equitable and Inclusive Workplace
- Category 4:** Fostering Worker Security
- Category 5:** DEI Health Check

For each category, we define 2-4 topics that together form the core of a successful DEI strategy. To understand how frameworks treat these topics, we draw on our DEI indicator tracker—an updated version of our 2022 tool—that incorporates recent framework updates plus newly released standards. The tracker catalogs 741 metrics and indicators from 35 influential frameworks explicitly or implicitly addressing DEI, spanning disclosure standards, performance benchmarks, guidance documents, and investment tools. For each topic, we document relevant indicators, analyze their strengths, and highlight those that best capture its essence.

We have tailored the analysis in two ways. First, we focus on anti-bias measures in the direct workforce. While we acknowledge the need for companies to extend DEI strategies to suppliers and other business relationships (see our 2022 report), to keep the analysis manageable we limited the scope to the direct workforce over which the company has direct influence.⁶⁷ Second, we focus on companies in the US and Europe, as these geographies have been at the forefront of the wider responsible business conduct and sustainability movement, are embroiled in the greatest DEI controversies, and are the sites of political action that has created a chilling environment and sowed confusion. Therefore, the reference to “companies” and DEI practices in this report should be understood as the practices specifically of US and European companies in relation to their direct workforce.

Three principles guide the DEI indicators we spotlight in this report:

1. ***The leading standards*** – Where possible, we spotlight the indicators that companies are already widely reporting against, or will need to be reporting against in the near



future, namely ESRS, Global Reporting Initiative (GRI), and the IFRS Foundation's International Sustainability Standards Board (ISSB).

2. **Evaluative** – prioritizing ambitious indicators that define actionable measures companies should take over purely disclosure metrics. Where the indicators of the leading standard setters focus only on disclosure rather than having an evaluative character, we highlight alongside them the indicators that prescribe what good looks like for that topic; regulation tends to focus on minimum requirements that raise the floor, whereas leading companies can be more ambitious in their approaches.
3. **Granular** - providing detailed prescriptions for addressing the topic. The Corporate Racial Equity Alliance Draft Standards (CREA) offer such specificity and therefore appear frequently in this report.

As we privilege performance indicators—i.e., indicators signaling what good looks like on a particular subject—over disclosure metrics, this report refers to all metrics or indicators simply as ‘indicators.’

While some topics, such as pay equity, appear across many frameworks, others, such as AI use in hiring, are infrequently covered. For each topic we indicate the total number of frameworks that contain indicators that address it and characterize the overall treatment of the topic across the frameworks to highlight the prevailing market signals. Often no single indicator fully captures a given topic; in such cases, we point out the gaps and identify additional indicators that address these missing elements. Very few topics are covered by even half of the frameworks reviewed, and many frameworks—including those developed by leading standard setters—do not cover salient aspects of DEI. Accordingly, we consider coverage of a topic by at least 50% of frameworks as a possible indicator of emerging best practice in that area. Overall, there is limited consensus on how to define workplace DEI, echoing the findings of our 2022 report.

Sustainability frameworks are continuously evolving, and several that we mapped for this report were undergoing revisions at the time of this research. Accordingly, this analysis draws on the exposure drafts of the following standards: European Sustainability Reporting Standards (ESRS-November 2025 draft), Global Reporting Project (GRI-Topic Standard Project for Labor, 2024-2025 drafts), Corporate Racial Equity Alliance (CREA-May 2024 draft). With the exception of GRI 2: General Disclosures of the Universal Standards, which were finalized in 2023, all references to these frameworks below are to these draft versions. See Appendix 2 for an explanation of the frameworks and the aspects mapped.



Coverage of contingent workers

The 16 topics elaborated below address both employees and non-employee workers, also commonly referred to as contingent, gig, or freelance workers. Increasingly companies are relying upon contingent workers, including non-permanent workers such as platform workers, presenting additional vulnerability for both workers and employers. According to the US Government Accountability Office, contingent workers make up 30-40% of the US labor force today; it is projected that the number could approach roughly half of the US workforce by 2050.⁶⁹

Because contingent workers are a growing, integral part of how work gets done and are directly affected by organizational culture, opportunity structures, and bias, their inclusion in a DEI roadmap is essential. Contingent workers increasingly perform core work rather than just short-term backfill, and many organizations rely heavily on staffing agencies and platform workers. If DEI is not extended to these channels, it weakens the overall HR strategy and allows bias to enter through a side door. Therefore, failure to provide contingent workers with comparable access to benefits, career development, and other fair work protections afforded to employees, not only cements a two-tier system that undermines equity goals but also creates vulnerability for the business itself.⁷⁰ Throughout the discussion of frameworks below we highlight where contingent workers are considered or overlooked.

We recommend that readers extend these actions to contingent workers to the extent allowed by law. While business lawyers in the US may raise concerns about misclassification risks, businesses can mitigate these by clearly distinguishing roles through established tests (e.g., economic realities under Fair Labor Standards Act, ABC tests in certain states), documenting contractor independence, and partnering with compliant staffing agencies—thereby upholding equity without triggering reclassification liability.⁷¹

BOX 2. EFRAG Loosens Requirement for Companies to Report Non-Employee Worker Data

During the simplification process of the CSRD, the European Financial Reporting Advisory Group (EFRAG) nearly eliminated the requirement for companies to report on non-employee workers. The rationale is explained in the Basis for Conclusions of the Draft Amended ESRS November 2025.⁶⁸



In this document EFRAG explains that “following frequent requests to reduce non-employee reporting due to data limitations,” it removed “all voluntary or conditional disclosures about non-employees... leaving only the total number of non-employees” (para. 469). The amended standard no longer automatically includes non-employee workers in disclosures. Instead, amended ESRS S1-6 conditions coverage on the entity’s materiality assessment—specifically when non-employees connect to material impacts, risks, or opportunities (e.g., when they are “critical to the undertaking’s business model” or comprise a “substantial proportion of the undertaking’s own workforce”) (para. 469). S1-6’s objective was revised accordingly to require disclosure only for such material cases, remaining “subject to materiality of information.”

The Basis for Conclusions also notes that some respondents argued for eliminating non-employee reporting altogether or making it fully voluntary. Ultimately, EFRAG retained the requirement in this reduced form, concluding that “the amended DR strikes an appropriate balance between reporting effort and information needs of users” (para. 470).

Beyond representation metrics

Collectively, the 16 topics in this Roadmap provide a practical blueprint for embedding a healthy, anti-bias culture into an organization through clear, transparent systems and processes, while actively working to mitigate conscious and unconscious bias. Most frameworks emphasize representation metrics because they are easy to observe and measure, and because they are influenced by investor demand for a diversity performance signal. In contrast, this Roadmap deprioritizes representation topics for several reasons.

First, representation metrics are an incomplete signal of performance. Researchers have found that instead “equity often serves as the foundation for successful DEI strategies, improving employees’ job satisfaction, work engagement, perceptions of inclusion, as well as the retention of diverse talent.”⁷² A study by SHRM, a global association of human resources professionals, found that in the US 88% of workers believe fairness is extremely important or very important in the workplace.⁷³

Second, representation in leadership roles is often used as a proxy for an inclusive company culture. While there is some evidence that diversity and values in top teams shape organizational practices and signals that, in turn, influence workforce composition and behavior (known as “upper echelons theory,”)⁷⁴ quotas or targets



are insufficient by themselves. They treat the individual from a minority group as a representative of that group, but that person is not obliged and may not always be willing to represent or advocate for that minority group. If that is the objective, their presence may be fairly characterized as tokenism.

Third, representation metrics at the top and throughout the organization often fail to capture where the power in the corporation lies. For instance, women and other marginalized groups remain significantly underrepresented in key leadership roles with profit and loss responsibilities.

Fourth, in some countries it is illegal to report on certain demographics, such as race. For instance, in France, the collection and processing of race and ethnicity data is only permitted under specified narrow conditions.⁷⁵ Similarly under Italian law, there is a general prohibition on the collection of information not strictly related to assessment of the employee's professional capability, and race and ethnic data is prohibited from being collected in a way that may affect a candidate's hiring prospects.⁷⁶

Finally, the notion of “disadvantaged groups” is context specific. Beyond gender, determining the “right” representation percentages across racial, ethnic, and other protected groups across geographies and capturing intersectionality remains challenging for companies and standard setters. Contextualization is essential, and only a small number of frameworks have succeeded in providing for race and ethnicity for specific country contexts (see Box 3).

Therefore, we argue that for most topics in this Roadmap, the emphasis should be on having in place clear and transparent processes, equally accessible to all workers, that can prevent bias.

We are not advocating for companies and their investors to ignore the composition of their workforces, however. Diversity is particularly relevant at senior management—and, to a lesser extent, at the board level⁷⁷—a fact supported by literature showing that diversity and values in top teams shape organizational practices and signals, which in turn influence broader workforce composition and behavior.⁷⁸ In fact, it is essential for companies to establish a comprehensive internal system to track demographics so that they can identify and address bias, assess the effectiveness of anti-discrimination measures, and develop improvement plans. Having in place what we refer to as a “discrimination risk management system”—the final topic of this Roadmap—is necessary for companies to reduce the risk of discrimination and build a successful workplace culture. It is therefore the knowledge that a company has such a system in place, rather than a particular representation figure, that is decision-useful for investors and other stakeholders.



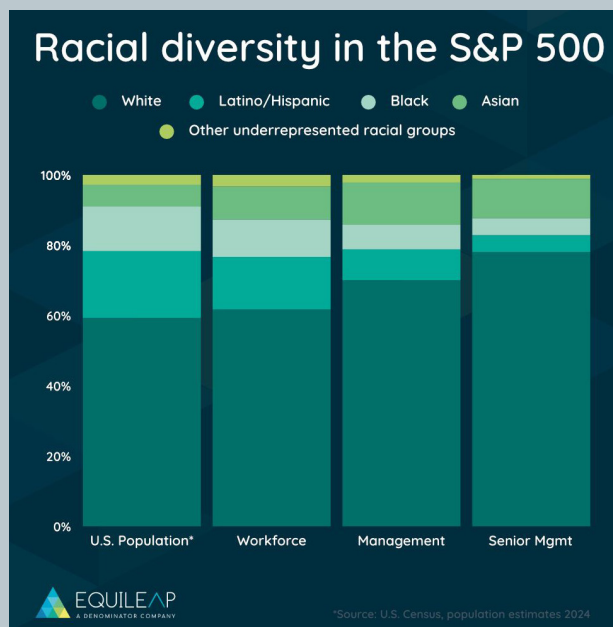
BOX 3. Accounting for Racial Diversity across Jurisdictions

The definition of disadvantaged, or non-majority, racial or ethnic groups changes depending on the jurisdiction. For instance, what constitutes a good representation figure in a French company is not appropriate for a Japanese company. Therefore, frameworks calling for a single representation figure for groups other than gender without specifying the regional context are of limited use.

Good examples of how to capture diversity are found in The Social Investment Consultancy and EIRIS Foundation’s Racial Equity Scorecard (TSIC & EIRIS RES) and Equileap’s 2025 Race and Ethnicity dataset. This TSIC & EIRIS RES indicator accounts for diversity across a company’s operations:

*B.01 Diversity across different employment bands: (Scoring Range: 0 to 2)
The employees of the company fairly reflect the communities in which they operate on all levels and the company discloses intersectional data yearly on recruitment, retention and career progression*

Equileap’s 2025 Race and Ethnicity dataset, which is depicted in the figure below, provides contextualized aggregated diversity data across the S&P 500 to clearly demonstrate the underrepresentation of racial minorities in senior management positions in the context of the general US population.⁷⁹



Category 1: Governance and Accountability

Governance structures set out the policies, processes, and decision-making frameworks that define the boundaries of acceptable behavior and accountability mechanisms for those who violate these boundaries. This category focuses on two aspects: an anti-discrimination policy and board oversight.

1. Anti-Discrimination Policy

Frameworks: 19

Local laws stipulate efforts companies must take to uphold an equitable and inclusive workplace, creating a fragmented regulatory landscape that companies with global operations must navigate in developing their policies. In this context, an anti-discrimination policy is fundamental—it lays the foundations for how the company’s talent or human resources team will adhere to the principle of equal opportunity wherever it operates. When made public, it provides a mechanism of internal and public accountability. Research has shown that employees who regard their company’s DEI policies as “genuine” are 74% less likely to experience discrimination, and six times more likely to describe their organization as fair.⁸⁰ In this way, an anti-discrimination policy that specifies how it will secure and promote a fair and equitable workplace can be linked to tangible benefits.

For the policy to be effective it should provide details on all of the elements in this Roadmap for both employees and contingent workers. This includes: 1) fairness in hiring, promotion, and dismissal; 2) an equitable and inclusive workplace, including pay equity, family care leave, career development, and accessibility accommodations; 3) governance and oversight of the policy implementation at the highest level; and 4) employee and senior manager training in noticing, understanding, and mitigating bias in people management.

Despite the importance of an anti-discrimination policy to creating an inclusive, equitable, and meritocratic work culture,⁸¹ just over half of the 35 frameworks in our tracker have one or more indicators that address the topic. As noted above, while the ESRS standards that were approved in July 2023 had a good indicator on an anti-discrimination policy, it was removed in the simplification process of 2025.⁸² Just over half of the indicators ask about the presence of a policy or public commitment without prescribing specific elements the policy should cover. For example, AIMA & Albourne A.1 asks, “Does the Firm have a formal Diversity and Inclusion policy or initiative?”

In addition, most of these indicators refer to policies for specific DEI topics rather than address the policy more holistically. Here is an indicative sample:



WDI 4.13 *The company has a **parental leave** policy covering birth and non-birth parents that exceeds the statutory minimum requirements.*

IRIS OI9478 *Indicates whether the organization has a written policy and practice of ensuring **fair dismissal** of employees and a system to monitor compliance with this policy.*

Institutional Limited Partners Association Due Diligence Questionnaire 2.0 020 *Describe any formal commitments the Firm has made to **promote and enhance diversity within the Board of Directors and Senior Management** at its portfolio companies. Identify any diversity targets the Firm has set for the Boards of Directors at its portfolio companies and any policies or practices implemented in support of achieving those targets. Provide content into how Firm uses board seats to further diversity objectives at underlying portfolio companies.*

Global Impact Investing Network (GIIN) IRIS + Standards (GIIN IRIS+) O11150 *Indicates whether the organization has a written employment policy to **recruit employees fairly and equally** and a system to monitor compliance with this policy.*

GEWE GE103.K *Has a company-wide policy on **access to quality health care** including sexual and reproductive health.*

Only three frameworks, CREA, GEWE, and GRI, have a comprehensive anti-discrimination policy indicator. CREA 4.1 is dedicated to the adoption and operationalization of a formal anti-bias and anti-racism policy, with criteria on assigning policy oversight responsibilities, regular reviews of the implementation of the policy, training, and supporting employee resource groups. UNEP-FI's gender-specific framework, GEWE, contains an indicator calling for an overarching policy that contains a gender-equality strategy and points to more granular specific policies that should also be in place:

GEWE 101 *Organisation-wide Gender Equality Strategy and/or Action Plan in place, covering gender-related risks, opportunities and impact. Holistic, organization-wide gender equality strategy/action plan in place that identifies specific priority areas where further improvement. This can be a stand-alone policy or commitment embedded in a broader corporate policy but must include dedicated resources for implementation (including both budget and human resources), and includes time-bound, measurable goals and targets.*

- » *Equal pay policy and/or commitment in place*
- » *Paid Maternity Leave Policy in place*
- » *Provides leadership training, coaching, and/or mentoring to support women to access management and leadership positions*



- » *Workplace health and safety assessments incorporate gender considerations, enabling a workplace that takes into account the health, hygiene and safety needs of all women and workers*
- » *Flexible work options available to all employees*

GRI NDEO (Non-Discrimination and Equal Opportunity) 1-a, also comprehensively covers various elements of an anti-discrimination policy, including extending the policy to “workers who are not employees”.⁸³

GRI NDEO 1-a *The organization shall:*

a. describe its policies to ensure non-discrimination and equal opportunity for its employees and workers who are not employees, including the following:

- i. recruitment;*
- ii. remuneration;*
- iii. working time and working time arrangements;*
- iv. maternity, paternity, parental, and caregiver leave;*
- v. performance management;*
- vi. training and education;*
- vii. termination;...*

e. describe how employees and workers who are not employees are informed about non-discrimination and equal opportunity policies;

f. describe how worker representatives are involved in developing, implementing, and evaluating non-discrimination and equal opportunity policies

These indicators do not capture all components of a good anti-discrimination policy, however. For example, assigning senior-level and board accountability for policy implementation is absent in them, but is part of GRI DIVE (Diversity and Inclusion) 1, B Lab Standards v2 (B LAB) JEDI 2.a.2, and CREA 4.1.⁸⁴

A comprehensive policy should contain detailed provisions for specific commitments. We recommend that companies adopt an overarching anti-discrimination policy, supported by a set of targeted policies that operationalize and reinforce that commitment, similar to the structure of the GEWE indicator, and covering all the topics in this Roadmap.



2. Board Oversight

Frameworks: 19

Board approval and oversight of an anti-discrimination policy is necessary to ensure its implementation. According to research from State Street Global Advisors (SSGA), directors believe that oversight responsibility should sit both within a dedicated board committee and be a full board responsibility.⁸⁵ Senior leaders should regularly update the designated committee on the implementation of the anti-discrimination policy.

Most of the board indicators—28 across 19 frameworks—are concerned with the gender or race composition of the board. For example, three indicators in the Bloomberg Gender-Equality Index (Bloomberg) focus on gender balance at the board level across four measures: the percentage of women on the board (Bloomberg 1), whether the board chair (Bloomberg 12) or CEO (Bloomberg 14) is a woman, and gender balance in board leadership through the percentage of board committees chaired or co-chaired by women (Bloomberg 13). Another notable indicator is Refinitiv’s Diversity Inclusion Ratings 4 (Refinitiv) on the “percentage of board members that have a cultural background different from the location of the corporate headquarters,” which acknowledges geographic variation and the need for context specificity. TSIC & EIRIS RES A.05 establishes a time-bound expectation by flagging “failure to have at least one ethnic minority board member by 2024” or to set a target for 2027 as a red flag under the UK’s Parker Review.⁸⁶

Whether board diversity is a reliable signal of an organization committed to anti-discrimination is a complicated matter. As mentioned earlier, merely appointing women or people of color to the board does not ensure that the company practices anti-discrimination. A 2025 study in the *Journal of Accounting Research* of how the Black Lives Matter protests shaped corporate diversity at different organizational levels of US-based companies found evidence of “diversity tokenism” at the board level where the appointment of Black directors did not translate into broader company-wide change:

Although firms headquartered in protest-affected counties add more Black directors, particularly in larger protests, this gain appears to largely offset the representation of other non-Black minority directors. Second, these board-level shifts do not consistently extend to executives or the general workforce. In contrast, a gap may emerge between a firm’s workforce composition and local labor-market demographics, particularly in the representation of Black employees. This pattern is consistent with diversity tokenism, which suggests firms may prioritize high-visibility board appointments and potentially downplay broader, transformative change. Our findings indicate that although board-level diversity gains are highly visible and attract notable public attention, they may not



be accompanied by an organization's transformative commitment to company-wide diversity.⁸⁷

Other indicators assess board composition beyond mere representation, mitigating the risk of superficial metrics. For example, CREA 3.1 on board education and CREA 5.7 on board competencies each shift the focus from demographic data to whether the board collectively has the necessary skills to provide adequate oversight. ESRS 2 GOV-1 on “how the administrative, management and supervisory bodies determine whether appropriate skills and expertise are available or will be developed to manage or oversee strategies and other measures designed to respond to material impacts, risks and opportunities” covers governance competencies that can include the board. Oxfam America Corporate Inequality Framework (Oxfam CIF) 039 distinctively asks whether the company has worker representation on the board, a practice that signals a meaningful change in governance power dynamics.

Only five frameworks contain indicators that address the oversight responsibility of the board and how it should be exercised. Of these indicators, two point to embedding responsibilities into governance guidelines, committee charters, or organizational procedures, including structured, recurring review process: For example, CREA 1.2 requires boards to “codify the scope of the Board’s oversight in its governance guidelines as well as in each standing committee charter,” while GRI 2-12 addresses board oversight of “management of impacts” and the review of the effectiveness of related processes. GEWE and WEPs, call for regular reporting to the board “on progress made and outcomes of strategy targets” (WEPs 1) to ensure the board has in hand the information it needs to provide effective oversight.

Together the following two indicators capture key components of board oversight of the implementation of an anti-discrimination policy:

CREA 1.3 *The Board regularly reviews the company's efforts to advance equity, inclusion, and socially responsible business.*

TSIC & EIRIS RES A.03 *A board member is accountable for achieving racial equity progress (going beyond representation) OR The contribution of the board to racial equity is part of the regular review of board performance.*

Having the board conduct a regular review of the policy (CREA 1.3) is basic good governance. We recommend that additionally, companies should be prepared to explain to stakeholders what actions the board has taken in response to its regular review findings. TSIC & EIRIS RES A.03 captures a critical point that the board's oversight of equity in the workplace should be part of board performance review.



Category 2: Hiring, Promotion, Dismissal

This category addresses anti-discrimination efforts relating to the entire employee lifecycle—from hiring to performance evaluation and promotion, to dismissal.

The academic literature is clear that organizational and regulatory attention to diversity is most visible and institutionalized in recruitment, and comparatively weaker and less transparent in promotion and dismissal processes.⁸⁸ One study reviews the literature and concludes that minorities experience lower job stability and fewer promotion opportunities, even when hired into similar positions, indicating discrimination beyond hiring.⁸⁹ The difference also be attributable to the fact that internal processes (evaluation, promotion, pay) are often less transparent and harder to study.

In terms of hiring practice, experts note a tendency to overemphasize training for human resources professionals, whereas training alone—without systems-level changes in recruitment, evaluation, and policy—is insufficient to achieve meaningful diversity or inclusion outcomes.⁹⁰ In a widely cited *Harvard Business Review* article, Dobbin and Kalev argue that compliance-oriented tools should be abandoned in favor of changes to recruitment systems, including broadening recruitment, using targeted recruitment, and redesigning evaluations.⁹¹ Accordingly, the salient topics we propose below call attention to relevant aspects other than training, while not dismissing training altogether.

3. Hiring Process: Job Announcement

Frameworks: 5

The hiring process includes two key decision moments where biases can manifest: 1) crafting and disseminating the job announcement; and 2) candidate screening, interviewing and selection. The job announcement—the focus of this topic—is the first point of contact for candidates. Poorly designed announcements can erect barriers that can shape who is likely to apply.

In 2022, Rights CoLab conducted research using large language models to uncover financially material human capital topics and metrics and identified discriminatory job announcement practices harming older workers and formerly incarcerated peoples as having financially material consequences.⁹² The research uncovered a shareholder proposal submitted by North Star Asset Management to Microsoft explaining why a company’s failure to actively recruit formerly incarcerated people is a material risk.

The tight tech labor market means that employers must not only rewrite the hiring and retention playbook but also cast a wider net by diversifying



the technology talent pool. Concurrently, companies, including Microsoft, seek to implement racial equity commitments. Given the disproportionately high incarceration rates of Black and Brown people in the US and case study evidence that formerly incarcerated employees can have lower turnover and better attendance and disciplinary records compared to their peers without criminal records, recruiting fair chance employees can help ease labor market constraints and advance racial equity goals.⁹³

Only five frameworks in the tracker include indicators related to job announcements and the visibility of opportunities to a broad pool of candidates. These indicators assess how companies promote awareness of openings and outline specific elements of job postings that organizations should consider incorporating into their recruitment strategies.

B Lab JEDI is notable for encouraging companies to review job descriptions for inclusive language and requirements; CREA for its detailed guidance on de-biasing job announcements by prioritizing skills over pedigree; and AIMA & Albourne Diversity and Inclusion Questionnaire (2020 – AIMA & Albourne) for highlighting the value of partnering with nonprofits to reach marginalized communities:

B Lab JEDI 2.g.1 *The company implements all of the following inclusive hiring practices... d) It analyzes its job description language and requirements to ensure they are inclusive and equitable.*

CREA 5.1 *Recruitment policies and practices cast the net wide for talent from all backgrounds...Debias job descriptions, including using gender-neutral position titles and pronouns, avoiding or balancing gendered terms, using ADA-compliant⁹⁴ language, ensuring qualifications are job-related, and clearly delineating between absolute job requirements versus “nice to have” requirements...Implement skills-based hiring, including removing immaterial and outdated skills from job descriptions and unneeded academic and professional degree requirements for all roles (not just entry-level roles)...Become a fair chance employer...*

AIMA & Albourne B.3 *Does the Firm engage with non-profit organizations or programs that promote the recruitment and retention of women and/or minorities? Please provide a list of relevant organizations and programs.*

ILPA 20.8 and CREA 5.1 address the need to take measures to widen the applicant pool in general, without specifying the job announcement. ILPA 20.8 calls on companies to analyze the hiring process to detect bias and correct it when it is found so as to widen the applicant pool “beyond traditional sources.” Similarly, in support of increasing the percentage of applications “from well-qualified underrepresented groups annually,” CREA 5.1 calls for appropriate recruiter training for internal recruiters, which we recommend be extended also to external recruiters.⁹⁵



4. Hiring Process: Screening

Frameworks: 7

The human mind has a need for shortcuts—the so-called cognitive bias—to process large volumes of information.⁹⁶ Hiring managers tend to gravitate towards candidates that remind them of themselves (affinity bias) or look for names of elite universities or well-known companies. These biases are often unconscious and rooted in personal experiences and societal and cultural norms. Moreover, with the widespread adoption of AI screening tools, additional measures need to be taken to mitigate biases—human or technological—in candidate screening.

The use of AI tools to conduct screening assessments in hiring processes is rapidly becoming the norm. The World Economic Forum reports that almost 88% of companies worldwide already use some form of AI for initial candidate screening.⁹⁷ AI-based screening is conducted for resume review, video interviews, and skill tests among other uses. Yet, these AI hiring tools often embed and potentially reinforce biases, as they are trained on historical recruitment practices and can lead to further re-entrenchment of existing human prejudices.⁹⁸ In response, US states recognizing the growing incidence of AI enabled hiring discrimination have passed legislation to mitigate these harms: Amendment to 1979 Illinois Human Rights Act (2024),⁹⁹ Colorado Artificial Intelligence Act (2024),¹⁰⁰ New York Local Law 144 (2021),¹⁰¹ and Amendment to the 1959 California Fair Employment and Housing Act (2025).¹⁰² These regulations typically require employers to provide notice to interested applicants of the use of AI tools, institute AI-specific risk management policies, and place an obligation on employers to avoid algorithmic discrimination.

It is surprising, therefore, that only four frameworks in our tracker—CREA; the World Benchmarking Alliance Digital Inclusion Benchmark (WBA Digital), which has a place in our tracker because it addresses this topic; ILO Global Business and Disability Network, Model Self-Assessment Tool (ILO-GBDN); and WDI—contain indicators to address harms stemming from the use of AI screening tools.

CREA 5.2 on workforce diversity details the inclusive and standardized screening procedures companies should adopt to actively mitigate bias in the worker screening and selection process. It includes ensuring demographic data associated with any applicant is not included in the package of materials received by interviewers and other decision makers and specifies how employers can test their AI programs for biases and structural barriers:

CREA 5.2 *Avoid AI-enabled resume screening programs unless the company has assessed such tools to confirm that its use does not result in bias or disparate impact based on any protected characteristics.*



CREA 6.5 builds upon the approach established by CREA 5.2 by embedding human accountability as a safeguard in AI-enabled employment decision-making. Specifically, it requires companies to:

- i. Assess any automated or AI-enabled tools used to manage workers or the workplace to confirm there is no bias or disparate impact based on any protected characteristics.*
- ii. Widely communicate the necessity and purpose of such tools to all workers.*
- iii. Ensure a seasoned HR leader or other relevant leader provide final review of any employment related decision-making powered by such tools.*

WBA Digital requires companies to implement “ethical AI practices that respect human rights,” recognizing that AI and other frontier technologies may pose “social risks to privacy, discrimination, and job security.” The benchmark defines ethical AI practices to include aligning company practices with regional or international AI frameworks, carrying out timely AI-related human rights impact assessments, and disclosing company AI governance mechanisms. ILO-GBDN outlines expectations for barrier-free recruitment screening processes for workers with disabilities, ensuring the accessibility of “automated e-recruitment, assessments using Artificial Intelligence, interviews, skill tests and/or gamified assessments.”

WDI 7.11 calls for disclosure on “how the company uses artificial intelligence in workforce management, including in recruitment, performance management and workplace decisions.” The indicator can surface how AI is shaping hiring and employment decisions but doesn’t set expectations for how bias should be identified or mitigated.

Beyond AI considerations, many experts stipulate that a diverse recruitment panel is necessary as a safeguard against bias.¹⁰³ Two frameworks in our tracker have indicators that address a diverse panel: UN Women and UN Global Compact’s Women’s Empowerment Principles (WEPs) on “ensur[ing] gender-balanced interview panels during hiring processes;” and CREA Standard 5.3 on “establish[ing] a demographically diverse panel of interviewers including across race, ethnicity, and gender” when multiple interviews are conducted with a single candidate. It should be noted, however, that as with any diversity and representation targets, the mere existence of panel diversity does not automatically deliver equitable outcomes. In particular, field studies in academia and medicine suggest diverse panels can mitigate individual biases through multiple perspectives, leading to broader evaluations and better hires, *only if* training and norms to avoid in-group favoritism or conflict are in place.¹⁰⁴

While not specifically addressing recruiters or hiring panels, ILPA 20.16 asks firms to describe any training the Firm provides to employees, and suggests the topics to be



addressed by training, including inclusive leadership, systematic racism, unconscious bias and/or harassment. It also calls attention to the importance of skilled training providers, training frequency, and the roles that receive the training.

Disability accommodations, addressed below in Topic 10 for workers once hired, should also be integrated into fair recruitment processes. In some countries, such as the UK, employers may not legally ask about health conditions but must inquire whether candidates require reasonable adjustments—a practice highlighted in B Lab Fair Work 1.1. Beyond equipping prospective employees with tools to succeed, reasonable accommodations should be provided during the recruitment process itself, as stipulated in CREA 5.2.

WEP usefully highlights due diligence and remediation processes to identify and address incidents of discriminatory screening:

WEP 3 (b) *Has due diligence and remediation processes in place to identify and address violations of recruitment policies that are based on gender discrimination...*

Yet companies should consider all potential forms of screening bias beyond gender, including disability, race, age, and other forms of bias.

5. Promotion Process: Performance Assessment

Frameworks: 15

Career progression also tests the idea of meritocracy, as performance reviews are a common point where bias frequently creeps in. Research shows, for instance, that women are often promoted at a slower rate than men.¹⁰⁵ To mitigate this, companies should adopt standardized and transparent performance assessment processes and establish clear advancement roadmaps to reduce bias. Ensuring equal access to career development opportunities, discussed in Topic 9, is also essential.

Among the fifteen frameworks that address this topic, most rely on representation indicators that call for disclosure of promotion rates by demographic group. For example,

AIMA & Albourne B.6 *In the last 3 years, provide the average percentage of the Firm's employees that were promoted who were in the following categories:*

- a. female
- b. racial/ ethnic minority
- c. cother minority groups

CREA 5.5 encourages companies, “on at least an annual basis and in conjunction with promotion cycles,” to measure and analyze promotion and internal hire rates across demographic groups, while noting that “for large companies, measuring more frequently (such as quarterly) is recommended” to surface disparities early.



Companies need to track demographics at different job levels as a means of detecting problems, which is the subject of Topic 16 of this Roadmap. However, for this and many other topics a sole focus on representation should be secondary to having in place clear and transparent processes that can prevent bias. Only CREA and GRI indicators focus on standardized performance review procedures to prevent bias. Both frameworks point to the essential elements of those procedures and a regular review to identify the individuals who might be passed over for performance review. CREA 5.3 emphasizes “skills-based and consistent criteria” for performance review procedures and developing career ladders for roles at all levels:

CREA 5.3 *The company establishes standardized, regular, and transparent performance assessment procedures company-wide, including requiring people managers to assess team performance in an equitable and inclusive manner using skills-based and consistent criteria....The company has skills-based career ladders and job competencies for all job types and levels, including ensuring entry-level and frontline roles have one or more avenues for advancement.*

The GRI indicator on performance management systems, GRI EMPL (Employment) 4, emphasizes the need for impartiality and objectivity, refers to an appeals process, and includes both employees and non-employee workers.

GRI EMPL 4 a. *describe its performance management system for its employees and for workers who are not employees, including how it:*

- i. ensures it is objective and impartial;*
- ii. respects the fundamental principles and rights at work;*
- iii. contains an appeals process.*

GRI EMPL 9 further delves into workers who may be excluded from the performance review process asking companies to report “the total number of workers who are not employees who received a performance review during the reporting period,” as well as “the reasons why employees and workers who are not employees did not receive a performance review.”

6. Dismissal Process

Frameworks: 7

While the DEI literature often emphasizes hiring over other lifecycle stages, discriminatory practices also taint dismissal decisions. For example, research shows less attractive employees face higher firing risk despite equivalent skills.¹⁰⁶ Yet only seven frameworks address fairness in firings.

Overall, dismissal indicators do not define standards for equitable termination, instead focusing on turnover rates. A representative example is a SASB indicator found in



several industry standards, such as E-Commerce, which asks companies to disclose:

SASB CG-EC-330a.2 (1) *Voluntary turnover rate for all employees* (2) *involuntary turnover rate for all employees*

Other indicators request data on employee departures or disaggregating turnover by identity group, employment type, or contract type (AIMA & Albourne, GIIN IRIS +, WDI, GEWE). These indicators can capture separation patterns, but do not address the fairness of dismissal practices or the quality of dismissal decisions. Just two frameworks do: GRI and CREA. GRI EMPL 6 points to several key elements of a transparent and fair dismissal policy, including the opportunity for appealing a termination decision:

GRI EMPL 6 *The organization shall:*

- a. *describe its termination policy for employees and workers who are not employees including:*
 - ii. *the valid reasons for termination listed in the policy;*
 - iii. *the procedure for termination for each reason for termination;*
 - iv. *any safeguards against wrongful and unfair termination;*
 - v. *the procedure for appeal against termination.*

Invoking ILO Convention 158 on Termination of Employment (1982), the guidance to this indicator emphasizes the relationship between termination and job security and provides a list of invalid reasons for termination.

The CREA framework addresses two additional elements of dismissal in CREA 5.3 and CREA 6.5. CREA 5.3 recognizes that the use of AI in termination decisions and processes risks introducing bias into decisions and calls for companies to avoid using it for this purpose.

CREA 5.3 *In separation practices, take at least the following concrete steps:*

- a. *Conduct exit interviews for all separations and include questions on whether the employee felt a sense of inclusion and belonging while employed at the company.*
- b. *Avoid automated/AI-enabled employment termination decisions and processes.*

CREA 6.5 calls attention to employment terms and post-employment restrictions as a dimension of fairness in workforce exit and transition. This practice can affect the security of the worker, and we return to it in Topic 13 on Social Protection.



Category 3: Equitable and Inclusive Workplace

This category focuses on the worker experience at the workplace and the equal provision of benefits and conditions needed for individuals to thrive in their jobs. It encompasses pay equity (or equal pay for work of equal value) across demographic groups, family leave, career development opportunities, and reasonable accommodations—the foundations of a healthy workplace culture.

7. Pay Equity between Identity Groups

Frameworks: 19

To foster a culture of meritocracy, people in comparable roles working under the same conditions should be paid the same, regardless of their gender, race, ethnicity, age, or disability—a principle known as “equal pay for equal work.”

Equal pay for equal work has been recognized by the ILO since 1919 and is a legal requirement in most jurisdictions worldwide.¹⁰⁷ This creates a near-universal mandate across UN member states, anchored by the UN Equal Remuneration Convention, 1951 (No. 100), ratified by 175 countries. In the US, key laws include the Equal Pay Act of 1963, which prohibits gender-based wage discrimination, and the Lilly Ledbetter Fair Pay Act of 2009, which treats each discriminatory paycheck as a new violation, extending statutes of limitations for claims.¹⁰⁸ In the EU, the 2023 Pay Transparency Directive combats gender pay gaps through salary ranges in job ads, bans on pay secrecy clauses, workers’ rights to pay information rights, mandatory gender pay gap reporting (starting 2027), and joint assessments for unexplained gaps exceeding 5%.¹⁰⁹

Nonetheless, differences in pay persist, for men and women for instance, doing jobs that are different but of equal value, pointing to patterns of continuous undetected discrimination despite the legal frameworks.¹¹⁰ According to the World Economic Forum 2025 Report, today women are still paid a mere 69% of what men are paid in equivalent roles.¹¹¹ Similarly, people of color earn consistently less than their white colleagues.¹¹² Hispanic and Black women still experience the widest gender pay gaps in the US, earning only 65 cents and 70 cents respectively for every dollar paid to white, non-Hispanic men.¹¹³

Pay equity is covered by over half of the frameworks, although there is wide variation in the indicators. AIMA & Albourne A.3 addresses pay gaps through a regulatory compliance lens, asking whether statutory or regulatory pay equity obligations apply in a firm’s jurisdictions and how adherence is assured. ESRS S1-15 mandates gender pay gap disclosure (for employees only) per European regulations,¹¹⁴ while GRI REWO



(Remuneration and Working Time) 5 requires disclosure of the gender pay gap in a manner similar to the UK's requirement for companies with over 250 employees.¹¹⁵

ESRS S1-15 40. *(97(a)(b) amended) The undertaking shall disclose:*

- a. the gender pay gap defined as the difference in average pay levels between female and male employees, expressed as a percentage of the average pay level of male employees; and...¹¹⁶

GRI REWO 5 *The organization shall:*

- a. *by significant locations of operation, report the percentage difference in average gross basic hourly pay of men and women for each employee category;*
- b. *report contextual information necessary to understand how the data has been compiled, including standards, methodologies, and assumptions used;*
- c. *report the definition used for 'significant locations of operation.'*

The WBA Gender Benchmark (WBA Gender) C01.c introduces an expectation for companies to seek out third party verification of a pay gap assessment.

Two racial equity frameworks in our tracker address racial pay gaps, which are regulated under general anti-discrimination laws. JUST Capital Corporate Racial Equity Tracker (JUST Capital) has five disclosure indicators on the frequency of pay gap analysis (without specifying adequacy), results, and pay ratios. TSIC & EIRIS RES B.02 calls for intersectional pay gap data—at a minimum by race and gender—and steps to close gaps. According to GRI, the finalized GRI REWO will include reporting against race/ethnicity and other demographic categories, as a recommendation, not a requirement.¹¹⁷ As noted above, frameworks focused on a single jurisdiction (e.g., JUST Capital and CREA in the US, TSIC & EIRIS in the UK) can more feasibly conduct racial gap analyses benchmarked against national demographics.

Five frameworks address corrective actions for identified pay gaps. WEP calls for disclosure on procedures to remediate pay inequalities, while guidance for REWO 1 Policies to determine remuneration, calls for taking “actions to ensure the principle of equal remuneration for work of equal value is applied to employees and workers who are not employees.” TSIC & EIRIS RES B.02 sets a higher standard by requiring publication of a plan and progress toward closing equity gaps. Similarly, WDI 5.4 calls for time-bound targets or KPIs, with measurement of progress to reduce pay gaps:

WDI 5.4 *What action has the company taken, or intends to take, to reduce pay ratios and gaps? State any KPIs and progress towards these, as applicable. Provide the percentage (%) of employees in the bottom, lower middle, upper middle, and upper pay quartiles by gender...The company is required to describe:*



- » *if the pay gaps are considered inequitable, the efforts the company is undertaking to assess the reasons for these gaps, e.g. undertaking a gender pay gap audit to further investigate any divergence;*
- » *any measurable and time-bound targets or KPIs set to assess and reduce pay gaps and/or improve the representation of disadvantaged worker groups in higher pay levels in the company.*

CREA 6.3 introduces “compensation adjustments and other concrete actions” to address pay disparities as part of risk management. It requires companies to account for legitimate factors like prior relevant experience and tenure in pay equity assessments, alongside leadership training and an annual budget reserve for remedies. This indicator, together with CREA 5.2, also emphasizes prevention by prohibiting hiring managers from asking about salary history and recognizing pay secrecy norms as contributors to wage discrimination.

8. Family Care Leave

Frameworks: 8

Caring for family members—whether children, elders, or siblings—is a basic necessity for working adults. Caregiving responsibilities often become a career inflection point, with negative stereotyping of carers—especially working mothers—causing trajectories to stall or decline. Family care leave not only gives workers time and security to support their families’ health and well-being, but it also promotes work–life balance and protects mental health without jeopardizing employment or financial stability. By enabling workers to step away from their jobs to provide care in a safe, lower-stress way, companies recognize the reality of unpaid care responsibilities, particularly for women who, as primary carers, still shoulder a disproportionate share of this work.

In some jurisdictions, laws impose a positive duty on businesses to proactively eliminate gender-based discrimination, treating access to parental leave as a key workplace adjustment that enables participation.¹¹⁸ Parental and other family care leave fosters a supportive, human-centered work environment and constitutes a key investment in society’s future,¹¹⁹ which is why most countries mandate some form of paid family leave. Although there is no federal statute against family responsibility discrimination (FRD), this form of discrimination is recognized in roughly half the US states and in Executive Order 13152, signed by President Clinton on May 2, 2000.¹²⁰ FRD is also recognized in Europe under the EU Work–Life Balance Directive (Directive 2019/1158), which grants workers specific rights related to parenting and caregiving, such as paternity, parental, and carers’ leave, and flexible working arrangements, and protects them against less favorable treatment or dismissal for exercising those rights. Denying workers equal access to adequate paid time off and reintegration support can lead to discrimination against adults with caregiving responsibilities, for example



through missed promotions or pay gaps. Monitoring leave uptake is also crucial, as it can reveal whether men, particularly as secondary carers, forgo benefits out of fear of discrimination and career penalties.

Just fourteen indicators across eight frameworks address family care leave, focusing on the availability of paid leave (beyond the legal minimum), eligibility criteria, and uptake rates. These indicators primarily target parental leave (including adoption), with only four addressing carer leave more broadly to encompass other family care.¹²¹

Starting with parental leave, as statutory paid primary and secondary carer leave varies significantly across jurisdictions, the WBA Gender indicator establishes a minimum global expectation drawn from ILO Convention No. 183 (Maternity Protection Convention) that companies provide at least 14 weeks of paid leave for the primary caregiver and at least two weeks for the secondary caregiver. For B Lab JEDI 2.k.1 parental leave is one of six paid leave options (to be certified a company must offer at least three of the six); it stipulates 18 weeks parental leave, which is encouraged under ILO Recommendation 191 accompanying the convention.¹²²

GRI PARE (Working Parents and Caregivers) 2 requires disclosure of leave uptake data, disaggregated by entitled employees who actually took it, significant location (as defined by the entity), and retention rates post benefit use.

GRI PARE 2 *The organization shall:*

- a. *report, for each significant location of operation, the percentage of employees entitled to:*
 - ii. *paid maternity leave that took paid maternity leave;*
 - iii. *paid paternity leave that took paid paternity leave;*
 - iv. *paid parental leave that took paid parental leave and a breakdown by gender;*
- b. *report, for each significant location of operation, the average number of paid weeks an employee takes for leave as an absolute number and percentage of the maximum number of weeks of paid leave for...*
 - iii. *maternity leave;*
 - iv. *paternity leave;*
 - v. *parental leave and a breakdown by gender;*
- c. *report the retention rate of employees that remain in an employment relationship one year after returning from maternity and paternity leave;*¹²³
- d. *report the definition used for 'significant locations of operation';*
- e. *report contextual information necessary to understand how the data has been compiled, including standards, methodologies, and assumptions used.*

This indicator along with GEWE's GE100.L and GE100.N and CREA 6.2 address retention and promotion of workers who took parental leave, and UN RISD SDPI II.B.10



calls for companies to ensure “smooth transition assistance to/ from extended leaves.” In contrast, the November 2025 amended ESRS S1-14 draft eliminated the requirement to disclose the percentage of entitled employees who took family-related leave as part of its caregiver entitlement indicator. By removing visibility into how effectively family leave provisions ease the caregiving burden on mothers/primary caregivers, the exposure draft reduces visibility into discrimination risks.

Turning to family leave more broadly, GRI PARE 1, GEWE 103.F, and CREA 6.2 extend benefits to all workers.¹²⁴ GRI PARE 1 requires disclosure on family leave policies, including efforts to encourage the uptake of leave benefits, reintegration support, working arrangements, and the worker representative involvement—all covering “employees and workers who are not employees.” GEWE 103.F applies to part-time, short-term, contract, seasonal, or temporary workers, with evidence of consistent, fair application of policies to non-full time employees. CREA 6.2 mandates carer and parental leave for all direct workers, notably addressing non-discrimination for atypical families through parity-achieving caregiver benefits and intentionally inclusive definitions of spouses, domestic partners, and parents. Only one framework, SDPI, specifically refers to “elder care” as part of the family care leave that full and part time workers should be entitled to:

SDPI II.B.10 Caregiving support programmes

This indicator recognizes the need for some level of support for an employee’s caregiving needs associated with prekindergarten, pre-teen and elder care.

It calls for provisions in corporate compensation and benefits programmes that allow employees to periodically suspend or reschedule their work without penalty or compromise to their employment status in order to provide care to their dependents.

All eight defined programmes listed below shall be offered to all full- and part-time employees:

- » *Paid parental leave for childbirth or adoption (both maternity and paternity) beyond legal minimum*
- » *Flextime and/or compressed work weeks*
- » *Teleworking*
- » *Access to on-site childcare facilities or subsidized services for longer-term care*
- » *Emergency back-up childcare services or subsidized support for short-term needs*
- » *Emergency back-up, paid leave or subsidized support for eldercare*
- » *Emergency back-up, paid leave or subsidized support for people with disabilities*
- » *Smooth transition assistance to/ from extended leaves.*



9. Career Development

Frameworks: 13

Every employee should have equal access to career development, training, and mentoring opportunities so they can advance their careers and have the necessary skills to pursue promotions.¹²⁵ Providing such opportunities is a widely accepted norm, and most companies claim to offer them. However, assessing who in fact has access to career development opportunities is essential to preventing bias; indicators that aren't explicit about including all workers may fail to expose disparities and discrimination. In addition to who has access, it's vital to track which workers actually participate in training and mentoring programs, paying particular attention to underrepresented groups. This helps to reveal whether all workers, including contingent workers, are truly benefiting equally from these initiatives.

Seven indicators address easily quantifiable training metrics, such as Coalition for Inclusive Capitalism's Embankment Project for Inclusive Capitalism Report (EPIC) on "total annual training hours per employee" and JUST Capital on "average hours of training or career development per employee". However, such indicators offer limited insight for investors, prospective employees or companies assessing workplace culture.

Three gender-specific frameworks and one race-specific framework introduce KPIs for equitable career development. WEP Q4 outlines "specific programmes to build the pipeline of qualified women for management or senior leadership positions," (e.g., mentoring, leadership coaching, professional networks) and requires "time-bound and measurable goals" for pipeline development. This is stronger than WBA Gender B02 or GEWE 102.G, which merely confirm professional development programs for women's advancement. MSCI Racial and Ethnic Diversity Dataset (MSCI Race) prioritizes "under-represented employees" for "internal mobility training or professional development."

WDI 7.3/7.4 requires a breakdown of training hours by gender and employee contract type to ensure equitable access. Business for Inclusive Growth (B4IG) Just Transition Indicators mandates a collaborative process to assess future skills needs and training gaps amid the green transition, with granular reporting on participation:

B4IG *Average hours of training per person that the organisation's employees have undertaken as a part of the ecological transition, by different groups (gender, age, ethnicity/race where applicable) and employee category.*

While these indicators speak to the need to level the playing field, a successful anti-bias approach to career development should make sure that training programs are



truly accessible to all workers, including contingent workers, to prevent deepening inequalities. Amended ESRS S1-12 requires a description of the training activities for the purpose of “continuous professional growth to upgrade employees’ skills and facilitate continued employability.” However, this indicator focuses solely on employees and overlooks key metrics such as actual participation rates, training effectiveness in promoting sustained employability, or extension of opportunities to contingent workers. None of these indicators bridges that gap.

The indicator that best represents this topic is CREA 5.3, which emphasizes overcoming obstacles, including systemic bias, in access to career development opportunities, a key driver of workplace discrimination. It specifies “establish[ing] accessible and widely communicated training and career development opportunities for all workers,” providing reasonable accommodations for workers with disabilities, and holding leaders accountable “to fostering a culture of career development, including by encouraging team members to participate in training and career development and ensuring their workloads allow for it.

10. Reasonable Accommodations

Frameworks: 10

All workers must have equal access to physical spaces, work processes, tools, and amenities to perform their jobs well. To achieve this, companies should address the needs of people with disabilities alongside those of women and gender non-conforming workers through reasonable accessibility and gender-equity accommodations. Below, we explore in turn how the frameworks address reasonable accommodations for each.

The term “people with disabilities” or “differently abled workers” should be understood not only as physical differences, but also sensory or cognitive differences (neurodivergence). The UN Convention on the Rights of Persons with Disabilities (CRPD, 2006), defines persons with disabilities as those with “long-term physical, mental, intellectual or sensory impairments” that, alongside barriers, hinder full and effective participation in society on an equal basis with others. Omitting any of these forms of disability from workplace policies make it more likely that managers will overlook needed adjustments to job design, communication, performance management, and environments. To create an inclusive workplace, a company needs to proactively design systems—from digital platforms and software to office layouts and communication protocols—with accessibility in mind. By removing the barriers for all workers to succeed, the company demonstrates that it respects diversity and strives to create a level playing field where success is determined by merit and capability.

Disability appears in 17 frameworks, but primarily as a representation indicator, (e.g., number or percentage of people with disabilities in the organization). Only four



frameworks advance beyond representation to confirm that companies provide accommodations ensuring workers with disabilities have equal access to opportunities.

The ILO-GBDN framework—the only one in our tracker dedicated to workforce disability—offers a comprehensive catalogue of accessibility practices across recruitment, day-to-day work conditions, training, technology, and the built environment. It highlights accommodations for disability in AI-driven recruitment, requires systems that “make it easy for employees with disabilities to request the tools and flexibility that they need in order to do their jobs,” and mandates routine assessments of whether reasonable adjustments are delivered effectively for candidates and employees. Additional indicators cover training accessibility, occupational safety and health policies referencing colleagues with disabilities, job-retention programs for newly disabled employees, digital accessibility, and procurement policies ensuring goods, services, and facilities are usable by persons with disabilities.

Yet ILO-GBDN has gaps: it focuses strictly on employees, unlike CREA 5.3 (extending accommodations to “all workers”) or GRI NDEO 1 (covering “employees and workers who are not employees”). It also omits internal communications tools (B Lab JEDI 2.l), external websites (B Lab JEDI 2.m), accessibility audits (CREA 2.3), which treat accessibility as systematically testable rather than assumed, and accessible design of company-controlled physical and virtual spaces (CREA 2.3). CREA 5.2 addresses recruitment accommodations—spanning the full employment lifecycle, like ILO-GBDN.

No framework explicitly addresses neurodivergence, despite World Economic Forum guidance noting that neurodivergent employees offer valued skills (pattern recognition, intense focus, creative problem-solving) but thrive only with tailored accommodations and inclusive cultures.¹²⁶ Hybrid working for disabilities is also absent, even as it becomes standard for knowledge jobs; upcoming standards may incorporate it—for example, UK Equality and Human Rights Commission guidance.¹²⁷

Turning to gender-equity accommodations, failure to set expectations for comprehensive and equitable support benefits can expose discrimination against new mothers/primary carers and gender non-conforming people, such as being overlooked for promotions or discrepancies in pay. Key measures include pregnancy support, on-site childcare, lactation rooms, menstrual hygiene access. Regulatory protections are patchy, with the strongest protections for pregnant women and new mothers.

ILO Convention 183 (2000) provides maternity protections, while the EU’s Pregnant Workers Directive (92/85/EEC), requires employers to evaluate risks to breastfeeding



workers and adjust conditions by, for example, prohibiting hazardous exposure. It also mandates suitable rest areas, which could include private lactation spaces.¹²⁸ In the US, the federal Pregnant Workers Fairness Act (PWFA), which came into effect 2023, requires employers with 15+ employees to provide lactation and other accommodations for known limitations related to pregnancy, childbirth, or related medical conditions—exempt only in cases of undue hardship.¹²⁹ More than 30 states had pregnant worker fairness laws prior to PWFA, many exceeding federal provisions.¹³⁰

Beyond maternity protections, the EU has no directive mandating gender-inclusive provisions, though anti-discrimination frameworks in some member states promote gender-neutral restrooms in public workplaces.¹³¹ In the US, alongside other anti-DEI executive orders, President Trump’s Executive Order 14168 (January 2025) defines sex as biological male/female and directs federal agencies to designate “intimate spaces” (e.g., bathrooms, locker rooms) by biological sex, rescinding prior gender-inclusion policies. This applies only to federal buildings—where transgender employees are now barred from preferred facilities, sparking lawsuits (e.g., ACLU class action by a National Guard civilian)—and does not extend to the private sector. Several states nonetheless require companies to provide access rights for transgender/nonbinary workers to use facilities matching their gender identity.¹³²

Just six frameworks address gender-inclusive amenities, to an extent. UN RISD SDPI II.B.10 specifies access to on-site childcare, while WEP and GEWE call for broad assessments of women’s health and safety needs. WEP 11 enables respondents to select from options regarding needs assessment, suggested provisions, and sex-disaggregated incident reporting, covering all workers, including contingent ones:

WEPs 11 *Does your company have an approach to address the specific health, safety, and hygiene needs of women at work and while commuting to work?*

Commitment

- a. *Has health and safety protocols that include explicit reference to the health, safety, and hygiene needs of women*

Implementation

- a. *Ensures adequate and safe toilet facilities for women that accommodate hygiene needs such as clean water and soap and disposal methods for feminine hygiene products*
- b. *Regularly checks company grounds to ensure they are adequately lit and secure*
- c. *Provides breastfeeding/pumping rooms that are clean and safe*
- d. *Provides access to transportation to and from work and while on business travel (including in environments where public transport is unsafe or unavailable)*



- e. *Provides training to staff on ergonomics, exposure to hazardous materials, and other occupational risks, taking into account the differential biological impacts of health and safety on women and men*
- f. *Provides personal protective equipment for both men and women, especially taking into consideration the needs of pregnant and nursing women*
- g. *Consults with male and female employees to determine if health, safety, and hygiene services and protections meet employee needs*

Measurement

- a. *Tracks health and safety incidents, disaggregated by sex*

Transparency

- a. *Reports publicly to company stakeholders health and safety incidents, disaggregated by sex*
- b. *Reports to the board health and safety incidents, disaggregated by sex*

GEWE 202.H sets out minimum women’s health and safety requirements for women employees (e.g., breastfeeding space, safe toilets with hygiene provisions like water, soap, and disposal), requiring recorded assessments and actions taken; and GEWE 103.S requires policies for inclusive physical environments (e.g., childcare), plus ongoing dialogue with stakeholders to track the impact of initiatives related to the physical work environment.

Only one indicator targets the needs of transgender workers, who are particularly vulnerable as explicit targets of anti-DEI campaigns: Human Rights Campaign Foundation’s Corporate Equality Index’s (HRC CEI) “Transgender Inclusion Best Practices” outlines specific measures for companies to take:

HRC CEI Criteria 3.c Transgender Inclusion Best Practices

Gender transition guidelines with supportive restroom, dress code and documentation guidance

Implementation of the at least one (1) of the following policies or practices

- » *Trans-inclusive restroom/facilities policy*
- » *Gender-neutral dress code*
- » *Policies/procedures that allow for optional sharing of gender pronouns*

Transgender rights remain poorly understood and accepted in many societies, as evidenced by their near-total omission from indicators across these frameworks—with this sole exception.¹³³



Category 4: Fostering Worker Security

Rising economic inequality further marginalizes already vulnerable workers, who are the first to be laid off in an economic downturn or amid advances in automation. Although women, migrant workers, racial and ethnic minorities, and others in low-wage or precarious jobs are most vulnerable to discrimination, DEI frameworks rarely address socioeconomic inequality. In the US, this disconnect largely stems from a cultural belief in individual responsibility over structural factors like race or wealth. A 2008 Brookings Institution report on economic mobility notes that Americans are more likely than people in other countries to attribute success to personal effort and skills¹³⁴—and less to family background and wealth—although other research points to demographic differences in the strength of views on hard work as the path to advancement.¹³⁵

Structural inequality and discrimination creates risks for companies, the broader economy, and large, diversified investors.¹³⁶ While companies on their own cannot address socio-economic inequality and cannot be held responsible for rectifying all historical injustices, businesses, as the primary economic unit of society, can be catalysts in reducing socio-economic inequality and fostering the security of their workers. There are three significant areas within a company’s purview where it can act: 1) adopting a living wage pay standard; 2) tracking and redressing the CEO-worker median pay gap; and 3) enhancing social protections through benefits policies.

11. Living Wage

Frameworks: 13

A living wage serves as a fundamental safeguard against socioeconomic inequality,¹³⁷ ensuring all workers—including from historically marginalized groups—earn enough to meet basic needs with dignity.¹³⁸ Conversely, sub-living wages perpetuate systemic income inequality.

Of the wage-related indicators in our tracker, 52% use a living wage standard. Two frameworks have indicators that refer to statutory minimum wage; however, these do not necessarily meet the living wage standards. For example, a SASB indicator anchors analysis to minimum-wage thresholds, asking companies to report the “Average hourly wage of...employees earning minimum wage, by region; (2) percentage of...employees earning minimum wage, by region.” GIIN IRIS+ OI6176 wage metric compares average wages to the local minimum wage, while other indicators track median or average wages (OI3480 and OI8791, respectively).

Most of the living wage indicators specify how living wage should be defined, adopting different approaches. CREA 6.1, for example, points to established methodologies



such as MIT living wage calculator, Anker, WageIndicator for determining living wage. B Lab Fair Work 2.8 considers a company to meet a fair wage standard where wages are set through collective bargaining, alongside several other possible approaches.¹³⁹ ESRS uses the term “adequate wages” reflecting EU terminology and the ILO’s 2024 wage-setting framework. Country context plays a significant role in many globally applicable frameworks. GRI REWO 4 facilitates living wage assessment by requiring disclosure of cost-of-living estimates and local minimum wages, thereby revealing any gap between statutory minimum wages and estimated living costs.

Amended ESRS S1-9 alludes to the potential material risks of not paying an adequate wage—the measure of fair wages in the EU following the EU Adequate Minimum Wages Directive (2022)—by requiring companies to disclose whether employees are paid an adequate wage by location and where this is not the case to “disclose the countries and the percentage of employees concerned.”¹⁴⁰ B Lab Fair Work 2.8 and GRI REWO 4 go a step further by calling for actions taken or a commitment—in the case of B Lab, a “closure plan”—to address the living wage gap, while CREA 6.1, WBA Social 10, and Oxfam CIF A1.3 each call for a time-bound target for correction. WBA CHRB D.2.1 benchmarks companies according to whether they conduct a gap analysis between current wages and living wages, disclose a plan to close gaps, and maintain ongoing processes to “review, monitor and address any instances of payment below a living wage.”

In terms of coverage of the application of a living wage standard, only 4 of the 11 frameworks—GRI, CREA, WDI, WBA Social—call for living wage data on contingent workers:

GRI REWO 4 *the number of workers who are not employees who are paid at the local minimum wage.*

CREA 6.1 *Pay living wages to 100% of direct workers and, if applicable, take concrete steps to ensure living wages are paid to 100% of contingent workers.*

WDI 5.9 *How is the company working to improve wage levels for non-employee direct operations workers?*

WBA Social 10 *The company discloses a time-bound target for paying all workers a living wage or that it has achieved paying all workers a living wage.*

CREA 6.1 requires demographic analysis across “race, ethnicity, gender, sexual orientation, disability, and age,” offering insight into which segments of the workforce experience lagging wages. By contrast, Impact Investing Institute’s Just Transition Criteria (III) call to disclose only the “% employees provided with living wage (or equivalent)” does not reveal where disparities occur.



12. CEO-Worker Pay Gap

Frameworks: 8

Monitoring the pay gap between a company’s CEO and its workers reflects a socially responsible approach and a commitment to equity and inclusion. Although major companies tend to resist addressing executive pay,¹⁴¹ a large gap signals an inequitable distribution of resources, frequently reinforced by biases that cluster employees from marginalized groups in lower-wage positions. Tracking this ratio allows leadership to understand the economic conditions of their lowest-paid workers and can promote the adoption of measures—such as pay equity audits, fairer promotion practices, and higher minimum wages—that help combat discrimination and advance fairness across the workforce. This is especially important given growing evidence that although executive pay soars, this has not “trickled down” to the wider organization and the CEO–median worker pay gap continues to widen.¹⁴²

Only eight frameworks include indicators on the CEO-worker pay gap, and as with living wages, their measurement approaches vary. For example, ESRS S1-15 calls for disclosure of “the annual total remuneration ratio of the highest-paid individual to the median annual total remuneration for all employees (excluding the highest-paid individual),” whereas GIIIN IRIS+ OI1582 requests the ratio of the highest-paid full-time employee’s remuneration (including bonus and excluding benefits) to that of the lowest-paid full-time employee.

CREA 6.4 on CEO-to-median worker pay ratio requires companies to adopt a “compensation philosophy...based on promoting shared prosperity across the workforce.” It mandates integrating equitable compensation practices into executive pay design, alongside expanding worker ownership participation—a means of redistributing power and profit. Companies must also track the percentage of direct workers participating in company ownership, disaggregated by job type and level, and at least race, ethnicity, gender, sexual orientation, disability, and age.

GRI 2-21 stands out in calling for reporting on the “contextual information necessary to understand the data and how the data has been compiled.”

GRI 2-21 Annual total compensation ratio. *The organization shall:*

- a. *report the ratio of the annual total compensation for the organization’s highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individual);*
- b. *report the ratio of the percentage increase in annual total compensation for the organization’s highest-paid individual to the median percentage increase in annual total compensation for all employees.*
- c. *report contextual information necessary to understand the data and how the data has been compiled.*



13. Social Protection

Frameworks: 14

Social protection for workers—including social security, unemployment and sickness benefits and other income support when people cannot work or earn enough—directly supports anti-discrimination efforts. ILO core labor standards, notably Convention 111 on discrimination in employment, require businesses to promote equality of opportunity and treatment in access to employment, training, working conditions, and benefits, explicitly encompassing social protections.¹⁴³ Workers without basic social protections face economic precarity that can lead to human rights abuses, including child and forced labor. This principle is especially relevant for companies in natural resource extraction and agriculture with global operations and long supply chains, and as companies transition to a low carbon economy.

Most of the social protection indicators in our tracker address whether companies extend core benefits to protect workers from income loss during major life events across global operations. Some of these call for clarity on whether contingent workers are entitled to company-provided benefits. For example, an Oxfam CIF indicator addresses health care coverage for the most vulnerable workers:

Oxfam CIF A4.2 *The company explicitly discloses healthcare coverage for part-time, temporary, and seasonal employees.*

Other indicators address whether the benefits extend to particular identity groups, such as Human Rights Campaign Corporate Equality Index (HRC CEI) 2.b on LGBTQI+ inclusion. This indicator sets expectations for “equivalency in same- and different-sex domestic partner medical and soft benefits,” and “equal health coverage for transgender individuals without exclusion for medically necessary care.”

Ten frameworks frame social protection in terms of general well-being support. For example, WDI and ILPA evaluate health and well-being programs, flexible work arrangements, or coverage for services such as gender-affirming care and fertility treatments. CREA 6.2 on essential and affordable benefits recommends certain social protections, such as an employer-matched retirement savings plan, life and disability insurance, and financial wellness supports like student loan assistance, tuition reimbursement, and emergency cash assistance. WBA Gender D04.a assesses whether companies help suppliers ensure “a gender-responsive, safe and healthy work environment” and access to gender-responsive health information.

The just transition frameworks in our tracker link climate action to social protection, spotlighting how climate and economic restructuring disproportionately impact vulnerable workers. GRI-SICH, WBA Gender, WDI, and B4IG require companies to evaluate the risks and opportunities created by the shift to a low-carbon economy,



track redeployment or reskilling efforts, and report the percentage of workers receiving new labor opportunities within a particular time frame. For example, the B4IG indicator in this category asks for the actions the company is taking to upskill/reskill all workers in the context of the transition and “the average hours of training per person” across all employees disaggregated by gender, age, ethnicity/race. The indicator also asks for the “percentage of workers who report skills training as useful to transition into other employment, disaggregated between technical and soft skills,” thereby extending the scope of company responsibility beyond the entity itself to the well-being of the individual and society as a whole. Similarly, GRI SICH (Significant Changes for Workers) 1 calls for disclosure on training on the context of significant changes for workers:

GRI SICH 1 *The organization shall...*

b. describe any actions taken to mitigate the negative effects of significant changes for employees and workers who are not employees, including:

- i. redeployment;*
- ii. training for up- and reskilling;*
- iii. workforce planning;*

CREA 6.5 (also discussed in Topic 6, Dismissal Process) calls attention to the security of a worker beyond the moment of termination and directs companies to consider the conditions placed on workers to allow or prevent job mobility as a dimension of fairness in workforce exit and transition. Accordingly, the company should review employment terms and post-employment restrictions to ensure they are fair, proportionate, and grounded in legitimate business needs:

CREA 6.5

4.a At least every other year, conduct a review of standard employment terms (e.g., offer letter and/or employment agreement templates) to ensure any restrictions during and after employment are fair and based on valid business needs...

4.b Avoid employment terms that create barriers to job mobility, including non-compete agreements...stay-or-pay clauses.

Having geographical specificity is particularly pertinent in the case of social protection benefits, as it is a measure of a company’s risk exposure and also signals the company’s willingness to go above and beyond local requirements. The ESRS and GRI indicators both call for disclosure by location, as can be seen in the following language for the relevant indicator in each framework:

ESRS S1-10 *(74 amended) If the undertaking’s employees lack social protection through public programmes or through benefits offered by the undertaking itself, it shall disclose the countries of operation where the following major life events*



are not covered by existing social protection programmes:

- a. sickness;*
- b. unemployment starting from when the employee is working for the undertaking;*
- c. employment injury and acquired disability; and*
- d. maternity leave.*

GRI REWO 6 *The organization shall:*

- a. report whether it makes contributions to the following types of social protection for its employees by significant locations of operation;*
 - ii. medical and health care insurance; ii. sickness benefit...*
 - viii. retirement benefit...*
- 9. describe actions taken to increase social protection coverage for:*
 - x. employees;*
 - xi. workers who are not employees;*

The requirement to disclose on “actions taken to increase social protection coverage” makes GRI REWO 6 a particularly useful indicator.



Category 5: DEI Health Check

Having implemented all 13 anti-discrimination measures described above, companies must then verify that their program is delivering results. In this category, we highlight three topics that help companies track outcomes, identify gaps, and take steps to prevent future harm:

1. Implementing an effective incident reporting mechanism that allows individuals to raise discrimination-related concerns without fear of retaliation, alongside a grievance process that ensures issues are addressed promptly and fairly;
2. Systematically tracking and transparently disclosing discrimination-related complaints and the actions taken to resolve them, thereby demonstrating accountability, supporting continuous improvement, and building trust internally and with external stakeholders;
3. Establishing a comprehensive discrimination risk management system, focused in particular on the end-of-employment stage.

Together, these measures enable companies to rigorously assess the effectiveness of their DEI approach, reduce legal risks, and reinforce their commitment to the highest standards of fairness and equality.

14. Incident Reporting Channel

Frameworks: 16

A reporting channel is essential to exposing discrimination and reinforcing the organization's commitment to non-discrimination at every level. When effective, it provides workers with a safe, trusted, and reliable platform to voice concerns without fear of retaliation. The second element—prompt, impartial investigation of reported bias, unfair treatment, or harassment—ensures accountability and fosters a fair work environment.

Six indicators detail what constitutes a safe and trusted reporting channel—AIMA & Albourne E.2, GEWE 102.B, UN RISD SDPI II.B.12, IFC Environmental and Social Performance Indicators for Capital Markets–Corporates (IFC-ES-C), CREA 4.2, and GRI 2-26—emphasizing anonymity, protections against retaliation, and inclusion of survivors in designing the mechanism. The guidance for the GRI indicator, which asks for a description of the reporting mechanism, highlights these attributes plus others such as mechanism independence, how it is communicated to “intended users,” usage rates, and outcomes.



GRI 2-26 *The organization can report:*

- » *who the intended users of the mechanisms are;*
- » *how the mechanisms operate and which level or function in the organization is assigned responsibility for them;*
- » *whether the mechanisms are operated independently of the organization (e.g., by a third party);*
- » *the process through which concerns are investigated;*
- » *whether requests for advice and concerns raised are treated confidentially;*
- » *whether the mechanisms can be used anonymously.*

Additionally, the organization can report information about the effectiveness of the mechanisms, including:

- » *whether and how the intended users are informed about the mechanisms and trained on how to use them;*
- » *the accessibility of the mechanisms, such as the number of hours per day or days per week they are available, and their availability in different languages;*
- » *how the organization seeks to ensure it respects users' human rights and protects them against reprisals (i.e., non-retaliation for raising concerns);*
- » *how satisfied users are with the mechanisms and with the resulting outcomes;*
- » *the number and types of requests for advice received during the reporting period, and the percentage of requests that were answered;*
- » *the number and types of concerns raised during the reporting period, and the percentage of concerns that were addressed and resolved or found to be unsubstantiated.*

Although the scope of this Roadmap is limited to the direct workforce, it is worth highlighting CREA 8.2, which calls for including in the supplier code of conduct “a description of the process and manner of anonymous communication with the company through which concerns may be raised by suppliers, business partners, vendors, workers, or anyone else.” This covers all types of workers in the value chain beyond employees.

Beyond a safe and anonymous reporting channel, companies should also have in place a remediation process—and/or a grievance mechanism—as a means of investigating and resolving discrimination instances by providing restitution for those who have been harmed. Effective handling of grievances is necessary to prevent the recurrence of unfair practices.¹⁴⁴

Leading corporate accountability standards—namely the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational



Enterprises on Responsible Business Conduct—set clear criteria for effective grievance mechanisms, which most related indicators adopt. For example, WDI 10.3 emphasizes grievance channel quality by requiring companies to assess mechanisms against the effectiveness criteria in UNGP Principle 31: legitimate, accessible, predictable, equitable, transparent, and compatible with human rights. Likewise, ESRS S1-32(a) on grievance mechanisms incorporates the cause, contribute, or directly linked language from UNGP 13 to define the scope of company responsibility:

The undertaking shall describe its general approach to and processes to provide or cooperate in remediation where it has caused or contributed to a material negative impact on people in its own workforce.

WBA Gender expands the coverage of access to grievance mechanisms to “employees as well as individuals and communities who may be adversely impacted by the company.” It also states that suppliers establish grievance mechanisms enabling their workers to raise complaints related to the supplier or the company’s operations. GRI 2-25 complements GRI 2-26 (channels for raising concerns) to form a complete system for communication, complaints, and resolution. It requires companies to describe “its commitments to provide for or cooperate in the remediation of negative impacts” and “its approach to identify and address grievances, including the grievance mechanisms that the organization has established or participates in.” Critically, it mandates disclosure on stakeholder involvement in the design, review, operation, and improvement of the mechanism, plus “how the organization tracks the effectiveness” of its grievance and remediation processes. The full indicator is set out below:

- GRI 2-25** *Processes to remediate negative impacts. The organization shall:*
- a. describe its commitments to provide for or cooperate in the remediation of negative impacts that the organization identifies it has caused or contributed to;*
 - b. describe its approach to identify and address grievances, including the grievance mechanisms that the organization has established or participates in;*
 - c. describe other processes by which the organization provides for or cooperates in the remediation of negative impacts that it identifies it has caused or contributed to;*
 - d. describe how the stakeholders who are the intended users of the grievance mechanisms are involved in the design, review, operation, and improvement of these mechanisms;*
 - e. describe how the organization tracks the effectiveness of the grievance mechanisms and other remediation processes, and report examples of their effectiveness, including stakeholder feedback.*



Surprisingly, only three frameworks on grievance mechanisms—WBA Social, Oxfam CIF, B Lab—and one on an anonymous reporting channel, CREA, explicitly extend these mechanisms to contingent workers. WBA Social 7.a, which inspired Oxfam CIF A10.7’s matching indicator,¹⁴⁵ requires mechanisms accessible to “all workers to raise complaints or concerns related to the company,” while CREA 4.2 calls for establishing the reporting channel for direct workers and then goes on to specify:

Though this Target applies to direct workers, if the company has a contingent workforce, it should also ensure such workers have the same or substantially similar avenues to raise and receive support in resolving issues they experience in connection with being contracted with the company.

Furthermore, while these indicators—and most others on reporting channels—address incident reporting and/or grievance mechanisms for all forms of corporate harm, four specifically target discrimination: AIMA & Albourne E.2, CREA 4.2, Just Capital, and GRI NDEO 1. For example,

GRI NDEO 1 *The organization shall...*

- c. *describe the actions taken to prevent, mitigate, and remediate discrimination, including violence and harassment of employees and workers who are not employees, especially those from vulnerable or under-represented social groups;*
- d. *describe how its employees and workers who are not employees have access to effective grievance mechanisms and other remediation processes related to incidents of alleged discrimination, violence, and harassment;*

Explicit reference to discrimination matters, as many employee handbooks omit dedicated reporting mechanisms for it.

15. Complaints & Controversies

Frameworks: 14

Tracking and analyzing discrimination-related complaints is essential for evaluating the effectiveness of a DEI strategy. Companies dedicated to building a discrimination-free workplace can systematically assess the number and types of incidents as part of a workplace culture diagnostic, which can help to support a shift from regulatory compliance and liability avoidance to proactive prevention.¹⁴⁶

Twelve of the indicators within the 14 frameworks addressing discrimination complaints and controversies focus on tracking the number and type of workforce incidents—and, in some cases, related financial liability. For example, amended ESRS S1-16 requires companies to disclose the following subtopics for their materiality assessments:



ESRS S1-16 *The undertaking shall disclose:*

- a. *subject to the relevant privacy regulations, the number of incidents of discrimination at work on the grounds of gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation, or other relevant forms of discrimination, including harassment, identified in the reporting period...*
- c. *the total amount of fines, penalties and compensation for damages recognised during the reporting period in the financial statements for incidents of discrimination and other human rights incidents.*

GRI NDEO 3 requires reporting on incidents by location, with added focus on the company's role in remediation and actions taken to prevent recurrence:

GRI NDEO 3 *The organization shall:*

- a. *report the total number and type of incidents related to discrimination, including violence and harassment, and a breakdown of the total number by region;*
- b. *for each region, describe the actions taken or planned to address each type of incident, including:*
 - i. *providing for or cooperating in the remediation of incidents;*
 - ii. *preventing incidents in the future.*

Oxfam CIF A9.4, related to violations of the US federal Equal Employment Opportunity (EEO) standards, draws attention to complaints and penalties for violating local laws or guidelines. IFC-ES-C highlights potential reputational harm by focusing on “public controversies,” including legal actions “involving working conditions (associations, collective agreements, labor laws, discrimination, equal remuneration, lack of equal opportunity, harassment).”

TSIC & EIRIS RES E.1 and CREA 4.6 focus on the management of complaints and controversies. TSIC & EIRIS RES E.1 adds a flag system for racial-equity cases, assigning a red flag for unresolved or severe incidents and a yellow flag when cases are:

TSIC & EIRIS RES E.1 *...well managed in the sense that they have been addressed publicly, affected stakeholders (or their representatives) have been engaged, disputes have been resolved, an agreed remedy has been provided where appropriate, and lessons have been learnt (and made public) from the allegations made.*

CREA 4.6 requires companies to track whether such controversies “steadily decrease in number compared against the last three years,” disaggregated at least by race, ethnicity, gender, sexual orientation, disability, and age. These are important elements of a comprehensive risk management system—the focus of our final topic.



16. Discrimination Risk Management

Frameworks: 19

This report advises companies to have in place clear and consistent workforce policies and processes and to de-emphasize representation metrics as part of an overall anti-discrimination strategy. Notwithstanding the fact that investors may want to see representation data for various employment levels of the company, we argue that it is more salient—and decision-useful—for companies to have in place an underlying discrimination risk management system.

Such a system should include regular analysis of demographic trends to identify, for instance, higher attrition rates or limited promotion among specific racial or gender minorities compared to other groups and uncover hidden patterns or pockets of discriminatory practices. These analyses should be combined with different tools of employee engagement (e.g. survey, focus groups, in-depth interviews), evaluation of DEI efforts, and regular assessment of workplace culture. Problems flagged by a grievance mechanism, for example, may be more than one-off incidents of unfair treatment, instead reflecting an organizational culture of discrimination—and it is only through recording and measuring them that hidden discrimination can be revealed.¹⁴⁷

When analyzing demographic trends of all workers at different tiers, managers should carefully choose the demographic categories they use, develop a process of organizational review where problems are identified and steps are taken to address these problems, and ensure the review takes place with sufficient frequency so that problems are quickly addressed. Senior executives and/or board members should be involved in the review; whether a company then decides to publish any of these figures is a separate strategic choice.

Tracking turnover rates is a prevalent indicator that appears in 16 frameworks, a reflection of investor interest in workforce stability.¹⁴⁸ Common elements of these indicators are counts of voluntary vs. involuntary exits (GIIN IRIS+ OI7225 and OI8431), turnover by gender (WDI 6.1), and turnover by race and gender (EPIC and Bloomberg). AIMA & Albourne B.7 addresses the trendline, asking for a three-year average share of departing employees who “were female, racial/ethnic minority, or other minority groups.” As You Sow & Whistle Stop Capital Workplace Equity Scorecard (AYS & WSC), a framework to assess company transparency, has an indicator that asks if the company has released the retention or turnover rates for specified racial and ethnic groups.

Despite companies’ heavy dependency on contingent workers, as is the case with other topics in this Roadmap, coverage of contingent worker turnover is spotty. Notably, ESRS does address contingent work in amended ESRS S1-5, which asks companies to disclose employee turnover rates alongside detailed workforce



composition data, including “the total number by headcount or full-time equivalent (FTE) of permanent employees (with a breakdown by gender), temporary employees (with a breakdown by gender), and non-guaranteed hours employees,” reported at country level. Likewise, GRI includes a range of employee types, including “temporary employees, non-guaranteed hours employees, full-time employees, and part-time employees,” in the context of organizational change in its indicators dedicated to circumstances of significant changes requiring redeployment of workers (GRI SIC 3).

Most diversity-related indicators focus on collecting demographic data on turnover, but they do not reveal how companies interpret, diagnose, or respond to disparities in non-majority group representation. To get under the hood of turnover numbers, GRI EMPL 7 addresses company use of worker feedback mechanisms by asking companies to track the most common reasons for voluntary turnover as well as the most common reasons for termination of employment. However, missing in this indicator is the subsequent step of potential actions that the company takes to address the particular problems that have been identified.

CREA 5.3, by contrast, calls for companies to incorporate exit interviews into separation practices and to ask whether employees felt a sense of inclusion and belonging, in order to surface underlying systemic issues that, if left unaddressed, can undermine workplace culture. Even before the point of exit, companies can gather worker input by providing channels for employee feedback, most commonly through survey instruments. Research consistently shows that experiences of workplace discrimination (for example, on the basis of race, gender, or age) are associated with higher turnover.¹⁴⁹

Climate surveys are a common method of employee engagement and assessment of workplace sentiment across the indicators, focusing on three aspects: 1) whether such surveys are conducted; 2) participation rates; and 3) results. For example, WDI 9.8 asks for “the percentage of employees who participated in the company’s most recent engagement survey or equivalent and the level of satisfaction indicated.” A SASB indicator for the Employee Engagement, Diversity & Inclusion disclosure topic requires companies to disclose “employee engagement as a percentage,” keeping the form of engagement open. It is noteworthy that none of the engagement indicators reference contingent workers directly. Eleven explicitly reference employees, with the remaining four indicators not specifying the aspects of the workforce that are surveyed.

Five frameworks—CREA, HRC CEI, EPIC, IIII, and ILPA—have indicators that signal what a meaningful worker feedback system entails and how companies should act on the data collected. An Impact Investing Institute Just Transition Criteria indicator asks for the number of “successful consultations,” defining successful as employee



engagement that is “intentional, ongoing, and meaningful.” HRC CEI focuses on whether the company makes it optional for employees to identify as LGBTQ+ in anonymous employee engagement or climate surveys.

Some of these engagement indicators focus on the presence or absence of a sense of inclusion, well-being, and belonging—key measures of workplace culture. For example, a Refinitiv indicator emphasizes using confidential surveys to assess “psychological safety”:

Refinitiv Employee wellbeing and health support which considers the needs of all employees, including those from Black and Ethnically Minoritised communities: (Scoring Range: 0 to 2)
Annual surveys, which ensure confidentiality and anonymity where appropriate, on employee wellbeing and psychological safety, with intersectional data analysis.

Similarly, two CREA indicators ask for the percentage by demographic group of all direct workers who report feeling “physically safe, psychologically safe, and a strong sense of fairness, inclusion, and belonging” (CREA 4.4), the percentage who annually report feeling represented, respected, and valued by their managers, and the percentage of senior leaders who annually report feeling confident in their abilities to foster a culture of equity, inclusion, safety, and belonging (CREA 3.4). ILPA 20.11 focuses on assessing “firmwide culture and describing how findings have been applied to changes in Firm policies, programs and processes.”

CREA 4.5 is the only indicator in the tracker that defines expectations for “equitable” voluntary turnover. It states that voluntary separation rates should be “below 20% annually, or steadily decreasing annually...across demographic groups,” and spotlights concrete follow-up actions, such as stay interviews and targeted interventions, when disparities or elevated rates appear. CREA 2.2 and 2.4 also focus on wider leader and team alignment and tracking demographics to understand trends in discrimination. This makes CREA the only framework that treats turnover as a signal of potential barriers to inclusion and a prompt for organizational change. WDI 6.3 also introduces year-over-year analysis by asking companies to explain significant increases or decreases across worker groups.

Caution should be exercised in combining employee engagement surveys with demographic data. Depending on the size and structure of the company, capturing demographic data in employee engagement surveys could compromise anonymity and thus the robustness of any valuable employee engagement results.

Many of the frameworks have indicators on periodic monitoring of specific DEI programs they have put in place to check if they are working, with some calling for follow up action where performance is lagging. For example,



GRI PARE 2 b. Report the **retention rate of employees that remain in an employment relationship** one year after returning from maternity leave;

ILO-GBDN Do you **routinely assess whether reasonable adjustments are delivered** efficiently and effectively for job candidates and for employees with disabilities?

TSIC & EIRS RES B.02 Disclosure of plan and action on closing the pay gap, **with mechanisms for tracking improvement.**

CREA 6.1 If there are living wage gaps for direct workers...**Annually analyzing whether there are disparities across demographic groups** (including at least across race, ethnicity, gender, sexual orientation, disability, and age) and adjusting plans to mitigate any disparities.)

Oxfam CIF A1.3 The company publicly discloses a time-bound action plan including assessments **and milestones towards a living wage commitment.**

WBA CHR B d) The company has a process in place to **regularly review, monitor and address any instances of payment below a living wage**

CREA 4.2 **Annually measure awareness of the [reporting and communication] channel and its efficacy** by soliciting anonymous feedback from direct workers, such as whether they are aware of its availability and feel safe reporting issues through the channel. Such measuring could be achieved through one or more targeted questions in annual culture and engagement surveys

While no single framework in our tracker offers an indicator or set of indicators capable of giving clear insight on the strength of a company's discrimination risk management system, which should include Topics 2-13, combined the above indicators begin to offer a partial picture of such a system.



Conclusion

We researched and wrote this report amid significant volatility in a rapidly evolving landscape, marked not only by an anti-DEI offensive in the US, but also by calls in the EU to simplify reporting standards, which led to the removal of basic DEI-related indicators. While anti-ESG efforts had been underway for several years in the US, 2025 marked the unleashing of a multi-prong government attack on DEI. Fearing the loss of favor with the administration, many US multinationals reconsidered their DEI programs and strategies—rebranding them or, in some cases, executing full U-turns and retreating from public commitments—creating reverberations worldwide.

Despite the heated political environment, investors still need decision-useful information to inform their strategies, and corporate DEI approaches remain vital to resilience, long-term planning, and overall business health. Businesses and economies function best when individuals can attain a meaningful job and realize their potential at the workplace, free from discrimination. Economic performance and innovation can be achieved when the rules of the road are fair for all, and companies reward hard work and integrity regardless of a person’s identity or background. Companies that aspire to “meritocratic workplaces” must actively work to dismantle these biases and barriers.

Whereas our 2022 study revealed that there is little consensus about what DEI should entail, amidst today’s polarized context, confusion about DEI has only intensified. This report argues that an anti-discrimination strategy cannot achieve a fair, merit-based workplace if it is primarily focused on hitting a numerical representation target. The pathway towards a more resilient and inclusive workplace—one that aligns with an organization’s diverse consumers, employees, investors, and other stakeholders and can withstand any legality test¹⁵⁰—lies in establishing well-designed, fair, and transparent procedures to actively reduce bias in hiring, promotion, and termination processes, and ensuring that essential workplace processes, conditions, and benefits needed for individuals to thrive in a work environment are accessible to all prospective and current workers. With today’s trend of increasing reliance on contingent workers, robust DEI programs are especially important to address rising worker precarity.

This report’s Roadmap outlines 16 essential elements that investors should look for to understand whether companies are building a discrimination-free workplace culture. It offers companies a legally sound, operationally consistent, and decision-useful approach to navigate today’s polarized environment while advancing merit-based outcomes. For each element, we analyzed indicators across 35 influential sustainability frameworks (741 total indicators) to assess coverage gaps and strengths. Companies



may already implement some of these practices, but all 16 elements are necessary for a fair, thriving workplace.

While supply chains are out of scope for this Roadmap, the same considerations should apply to supply chains contexts. As we noted in the 2022 report, applying a discrimination lens to human rights impact assessments throughout the value chain is a potent way to identify supply chain risks and vulnerabilities.¹⁵¹ This is recognized in ESRS “Disclosure Requirement S2-2 Processes for engaging with value chain workers about impacts:

Where applicable, the undertaking shall disclose the steps it takes to gain insight into the perspectives of workers that may be particularly vulnerable to impacts and/or marginalised (for example, women workers, migrant workers, workers with disabilities).

For investors interested in accessing demographic data, we recommend that standard setters respond by designing disclosure indicators that capture demographic trends over time, disaggregated at least by gender and race as well as by location and employment tiers. However, both investors and standard setters should view representation data primarily as a signal—and potential warning—of underlying discrimination risks. To assess whether a company can effectively mitigate bias while sustaining a high-performing workforce, investors need evidence of a robust system for diagnosing workforce management issues, supported by a time-bound remediation plan (Topic 16). For example, a process that rigorously identifies and addresses pay inequities (Topic 7) provides stronger evidence of workplace resilience than demographics alone. Such a plan should be grounded in a comprehensive anti-discrimination policy covering all elements of this Roadmap (Topic 1), with explicit board and senior management accountability for oversight and implementation.

We hope that,

- / Investors find this Roadmap useful in determining decision-useful information on the health of the company’s workforce culture.
- / Companies will use this Roadmap to improve or restart their DEI strategy so that it is truly anti-discriminatory.
- / Standard setters elevate and refine the 16 topics in their standards; for those standard setters who need to consolidate the disclosures to 3 or 4, we recommend focusing on Topic 1, Anti-Discrimination Policy (Topic 1), Pay Equity (Topic 7), and Discrimination Risk Management (Topic 16).



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Appendix 1: Frameworks Covering Each Roadmap Topic

The “Actions to Take” recommendations of the Roadmap (pages 6-9) are derived from one of three processes: (1) synthesizing existing indicators; (2) adapting an existing indicator; or (3) adding our own where gaps exist. The indicators—and the rationale for any adaptations or additions—are elaborated (and often reproduced) in the relevant Topic discussion sections. Topics 1 (Anti-Discrimination Policy) and 16 (Discrimination Risk Management) primarily fall into the third category, as no framework has an indicator that provides comprehensive coverage of either topic as we have defined it, despite partial treatment across many frameworks.

Below, for each Roadmap topic, we list the specific indicators informing the “Actions to Take” section. We also identify all frameworks containing related indicators, matching the counts noted in the topic sections.

1. Anti-Discrimination Policy

Indicators informing Actions to Take: N/A

Frameworks addressing this topic (19)

AIMA & Albourne	GRI	SASB
B Lab	IFC	UN RISD SDPI
CREA	ILPA	WBA Social
Equileap	GIIN IRIS+	WDI
ESRS	Just Capital	WEP
ILO-GBDN	Oxfam CIF	
GEWE	Refinitiv	

2. Board Oversight

Indicators informing Actions to Take:

CREA 5.7, Oxfam CIF 039, TSIC & EIRIS RES A.03

Frameworks addressing this topic (19)

AIMA & Albourne	GRI	SASB
B Lab	IFC	UN RISD SDPI
CREA	ILPA	WBA Social
Equileap	GIIN IRIS+	WDI
ESRS	Just Capital	WEP
ILO-GBDN	Oxfam CIF	
GEWE	Refinitiv	



3. Hiring Process: Job Announcement

Indicators informing Actions to Take:

B Lab JEDI 2.g.1, CREA 5.1, AIMA & Albourne B.3

Frameworks addressing this topic (5)

AIMA & Albourne	ILPA
B Lab	IRIS
CREA	

4. Hiring Process: Screening

Indicators informing Actions to Take:

CREA 5.2, CREA 5.3, WEPs 3

Frameworks addressing this topic (7)

B Lab	WBA Digital
CREA	WDI
ILO-GBDN	WEP
ILPA	

5. Promotion Process: Performance Assessment

Indicators informing Actions to Take:

CREA 5.3, GRI EMPL 4, GRI EMPL 9

Frameworks addressing this topic (15)

AIMA & Albourne	GEWE	TSIC & EIRIS RES
AYS Race	GRI	UN RISD SDPI
AYS & WSC	GIIN IRIS +	WBA Gender
Bloomberg	JUST Capital	WDI
CREA	Refinitiv	WEP

6. Dismissal Process

Indicators informing Actions to Take:

CREA 5.3, GRI EMPL 6

Frameworks addressing this topic (7)

AIMA & Albourne	GIIN IRIS +
CREA	SASB
GEWE	WDI
GRI	



7. Pay Equity between Identity Groups

Indicators informing Actions to Take:

CREA 6.3, GRI REWO 1, WBA-Gender C01.c, WDI 5.4

Frameworks addressing this topic (19)

AIMA & Albourne	ESRS	TSIC & EIRIS RES
AYS & WSC	ILO-GBDN	UN RISD SDPI
B Lab	GRI	WBA Gender
Bloomberg	III	WDI
CREA	GIIN IRIS +	WEP
EPIC	JUST Capital	
Equileap	Oxfam CIF	

8. Family Care Leave

Indicators informing Actions to Take:

CREA 6.2, ESRS S1-14, GRI PARE 1, GRI PARE 2, GEWE 103.F

Frameworks addressing this topic (8)

B Lab	GEWE	UN RISD SDPI
Bloomberg	GRI	WBA Gender
CREA	ILPA	

9. Career Development

Indicators informing Actions to Take:

B4IG, CREA 5.3, WEP Q4

Frameworks addressing this topic (13)

B4IG	GEWE	WBA Gender
CREA	GRI	WDI
EPIC	JUST Capital	WEP
ESRS	MSCI Race	
ILO-GBDN	UN RISD SDPI	

10. Reasonable Accommodations

Indicators informing Actions to Take:

CREA 2.3, CREA 5.2, HRC CEI Criteria 3.c, ILO GBDN (multiple indicators)

Frameworks addressing this topic (10)

B Lab	ILO-GBDN	UN RISD SDPI
HRC CEI	GEWE	WEP
CREA	GRI	
ESRS	ILPA	



11. Living Wage

Indicators informing Actions to Take:

B Lab Fair Work 2.8, CREA 6.1, GRI REWO 4, Oxfam CIF A1.3, WBA CHRB D.2.1, WBA Social 10

Frameworks addressing this topic (13)

B Lab	III	WBA CHRB
CREA	GIIN IRIS +	WBA Social
Equileap	Oxfam CIF	WDI
ESRS	SASB	
GRI	UN RISD SDPI	

12. CEO-Worker Pay Gap

Indicators informing Actions to Take:

CREA 6.4, GRI 2- 21

Frameworks addressing this topic (8)

B Lab	GRI	UN RISD SDPI
CREA	GIIN IRIS +	WDI
ESRS	Oxfam CIF	

13. Social Protection

Indicators informing Actions to Take:

ESRS S1-10, GRI REWO 6

Frameworks addressing this topic (14)

B4IG	ILPA	UNCTAD
HRC CEI	GIIN IRIS +	WBA Gender
ESRS	Oxfam CIF	WDI
GEWE	SASB	WEP
GRI	UN RISD SDPI	

14. Incident Reporting Channel

Indicators informing Actions to Take:

GRI 2-25, GRI 2-26, GRI NDEO 1

Frameworks addressing this topic (16)

AIMA & Albourne	GRI	UN RISD SDPI
B Lab	IFC	WBA Gender
CREA	ILPA	WBA Social
Equileap	GIIN IRIS +	WDI
ESRS	JUST Capital	
GEWE	Oxfam CIF	



15. Complaints & Controversies

Indicators informing Actions to Take:

CREA 4.6, ESRS S1-16, GRI NDEO 3, TSIC & EIRIS RES E.1

Frameworks addressing this topic (14)

AIMA & Albourne	III	TSIC & EIRIS RES
CREA	ILPA	SASB
ESRS	GIIN IRIS +	WBA Gender
GRI	Oxfam CIF	WDI
IFC	Refinitiv	

16. Discrimination Risk Management

Indicators informing Actions to Take: N/A

Frameworks addressing this topic (19)

AIMA & Albourne	GEWE	Refinitiv
AYS & WSC	GRI	SASB
B Lab	HCMC	UN RISD SDPI
Bloomberg	HRC CEI	WBA Gender
CREA	III	WDI
EPIC	ILPA	
ESRS	GIIN IRIS +	



Appendix 2: About the Tracker

This mapping of DEI frameworks is neither exhaustive nor representative of all efforts to assess corporate DEI practices. To build this tracker, we started with the 21 frameworks mapped in our 2022 report, [What is DEI? Market Signals of Diversity, Equity and Inclusion](#), incorporated revisions where frameworks had been updated and added 15 frameworks—13 that were newly launched since 2022 plus two that we added that had relevant indicators for this research. Most of the frameworks are publicly available; we could not include frameworks from commercial ESG data providers (e.g., Sustainalytics, ISS) or research and consulting firms (e.g., McKinsey, Gartner) because they are not publicly available. While we accessed ISO (International Standards Organization) 30414 Human Resource Management for the 2022 report, we were unable to obtain the revised 2025 version and thus excluded it this time. This process resulted in 35 frameworks and 741 indicators in the tracker.

We selected only a small number of company surveys for mapping: AIMA, ILPA, and the Global Business and Disability self-assessment. The Disability Index, for example, features a highly detailed survey with over 150 questions designed to help companies “build a roadmap of measurable, tangible actions that they can take to achieve disability inclusion and equality.” We excluded it because it is an issue-specific questionnaire. Furthermore, its multi-part question structure complicates mapping and its indicators—up to four times more numerous than in other frameworks—would skew the analysis. Finally, we capture its core concepts through the Global Business and Disability Network’s framework, which aligns with the Disability Equality Index and has a comparable number of indicators to the others we mapped.

This mapping also does not cover DEI disclosure regulations of individual jurisdictions beyond the US and Europe, since the scope of this research is limited to US and European markets and to do so well would be unwieldy.¹⁵²

Below is a list of the frameworks, their stated purpose and the parts of each framework that we mapped. They are organized according to their geographic scope, a factor we considered in this analysis. The benchmarks and raters in the sample are indicated with an asterisk, and the weightings they use, if publicly available, are noted.

Global

[AIMA & Albourne, Diversity and Inclusion Questionnaire \(AIMA & Albourne\) 2020](#)

- / D&I questionnaire for alternative investment managers
- / “The Alternative Investment Management Association (AIMA) is the global representative of the alternative investment industry, with around 2,100 corporate members in over 60 countries.”
- / **What we mapped:** All questions



B Lab, Standards v2 (B Lab) 2025

- / Certification standard consisting of seven Impact Topics that a company must meet to be certified as a B Corp. Companies must satisfy a set of baseline “Foundation Requirements” plus specified requirements under each Impact Topic that apply based on size, sector, and risk profile. Often the Standards offer multiple options for the company to satisfy the specified requirements.
- / “The B Lab Standards define social, environmental, and governance practices for purpose-driven businesses.”
- / **What we mapped:** Justice, Equity, Diversity & Inclusion (JEDI) and Fair Work (FW) indicators; Purpose & Stakeholder Governance (PSG), indicator 3, “adequate procedures to address stakeholder grievances”

*** Bloomberg, Gender-Equality Index (Bloomberg Gender) 2022**

- / Benchmark to track progress across companies on gender inclusion
- / “GEI participants are scored against five key pillars: leadership and talent pipeline, equal pay and gender pay parity, inclusive culture, anti-sexual harassment policies, and external brand. In addition to the pillars, exploratory questions were included in the Framework, allowing for other areas of the “S” to be explored. These questions, surveyed but not scored, covered other areas such as race and sexual orientation, gender identity and ethnicity.”
- / **What we mapped:** All indicators
- / **Weighting:** Scoring across the five pillars is weighted as follows: Disclosure: 30% (data completeness and transparency); Leadership & Talent Pipeline: 25%; Equal Pay & Gender Pay Parity: 20%; Inclusive Culture: 15%; Anti-Sexual Harassment Policies: 5%; External Brand 5%

Business for Inclusive Growth, Just Transition Indicators (B4IG) 2024

- / Disclosure indicators on how companies manage the social impacts of the ecological transition related to workers, communities, and consumers
- / “The objective of these indicators is to help companies identify, assess, and address the social impacts of the transition in companies’ own operations, their supply chains, and their business relationships.”
- / **What we mapped:** Indicators for: 1) Transparent planning process; 2) Employment, and 3) Upskilling and reskilling

Embankment Project for Inclusive Capitalism Coalition Report (EPIC) 2018

- / Open-source framework that helps businesses measure and evaluate long-term financial value and non-financial performance
- / “The Coalition for Inclusive Capitalism and EY brought together more than 30 global business leaders, including asset owners, managers, and companies representing almost \$30 trillion of assets under management (AUM), to develop a standardized, material, and comparable set of indicators for the measurement



of activities that create long-term value and that affect a broad range of stakeholders including customers, employees, suppliers, communities, and shareholders.”

- / **What we mapped:** Indicators from two sections: 1) “Human Capital Deployment,” which refers explicitly to diversity and marginalized groups, such as gender and age; and 2) “Diversity and Inclusion”

***Equileap, Gender Equality Scorecard (Equileap) 2016**

- / Assessment of a company’s gender equality performance at all levels
- / “The Equileap Gender Scorecard is inspired by the UN’s Women Empowerment Principles. For each gender criterion, one or several indicators have been identified to evaluate it. Last, a score and weighting has been allocated to each criterion to reflect that some issues may be more important for furthering gender equality than others.”
- / **What we mapped:** Equileap’s indicators are available only through a paid platform. Therefore, we mapped only the 19 Gender Equality Scorecard Criteria, which are published in the annual “Gender Equality Global Ranking & Report” available on Equileap’s website
- / **Weighting:** Unavailable

Global Impact Investing Network, IRIS + Standards (GIIN IRIS+) 2025

- / Impact measurement and management indicators designed mainly for the private equity industry
- / “Credible, comparable impact data are needed to inform impact investment decisions and drive greater impact results. IRIS+ solves for this by increasing data clarity and comparability, and it provides streamlined, practical, how-to guidance that impact investors need, all in one easy-to-navigate system. It is a free, publicly available resource managed by the Global Impact Investing Network (GIIN)—the global champion of impact investing.”
- / **What we mapped:** 64 indicators within the Diversity & Inclusion Impact Category, all of which are also covered by the framework’s Gender Lens and the Racial Equity Lens

Global Reporting Initiative, Universal Standards 2021 and Labor Topic Exposure Drafts (GRI) 2024-2025

- / Created as a “modular system of interconnected standards,” GRI 2: General Disclosures is a Core Standard within the Universal Standards, which all GRI reporters are required to use. The 400-series standards are topic-specific and are applied only when a company identifies the relevant topic as material. At the time of this research, the Topic Standard Project for Labor was undergoing revisions. The first phase of the Topic Standard Project for Labor on “Employment practices and conditions,” covering GRI SICH, GRI EMPL, and



GRI REWO, was open for public comment from June 10 to October 4, 2024. The second phase on “Working life and career development,” was open for public comment from February 25 to April 29, 2025, and included GRI PARE. The third phase, also on “Working life and career development,” was open for public comment from July 1 to September 15, 2025, and covered GRI NDEO and GRI DIVE. The Global Sustainability Standards Board (GSSB) is expected to formally approve all revised labor standards in mid-2026

- / “The GRI Standards represent global best practice for reporting publicly on a range of economic, environmental and social impacts. Sustainability reporting based on the Standards provides information about an organization’s positive or negative contributions to sustainable development.”
- / **What we mapped:** Diversity indicators in the GRI 2 General Disclosures (2021), and the Topic Standard for Labor Exposure Drafts: GRI REWO: Remuneration and Working Time (2024), GRI 2: General Disclosures (2021), GRI REWO: Remuneration and Working Time (2024), GRI EMPL: Employment (2024), GRI SICH: Significant Changes for Workers (2024), GRI PARE: Working Parents and Caregivers (2024), GRI TRED: Training and Education (2024), GRI NDEO: Non-Discrimination and Equal Opportunity (2024), and GRI DIVE: Diversity and Inclusion (2025)

IFRS Foundation, SASB Industry Standards, 2023

- / Industry-specific reporting standards. In 2022, the SASB Standards were integrated into the IFRS Foundation’s International Sustainability Standards Board (ISSB). Originally designed primarily for the US market, the IFRS Foundation undertook a process in 2023 to “globalize” these standards
- / “SASB Standards identify the subset of environmental, social, and governance issues most relevant to financial performance in each of 77 industries. They are designed to help companies disclose financially material sustainability information to investors.”
- / **What we mapped:** Employee Engagement, Diversity, and Inclusion indicators

*** ILO Global Business and Disability Network, Model Self-Assessment Tool (ILO-GBDN) 2022**

- / Tool for companies to gauge where improvements can be made so that they are more inclusive of people with disabilities. The tool is designed to be adapted for the needs of different countries
- / “Aligned with the 10 principles of the ILO Global Business and Disability Network (GBDN) Charter, this model self-assessment tool helps companies to identify areas for improvement in its efforts to become more inclusive of persons with disabilities. While the tool can be used as it stands, global companies or national business and disability networks might want to customize it to adapt the tool to the particular circumstances of the company and national contexts,



for instance by adding references to compliance with quota legislation, where it exists.”

- / **What we mapped:** All indicators
- / **Weighting:** Unavailable

ILPA, Due Diligence Questionnaire 2.0 (ILPA) 2021

- / Questionnaire to help private equity firms monitor the DEI progress of portfolio companies; last updated in 2021
- / “Since 2013 ... as the [private markets] industry has meaningfully evolved, ILPA seeks to ensure that the DDQ reflects emerging practices and norms, as well as transformation in technology, operating processes and industry best practices, all while maintaining a core focus on improving transparency, governance and alignment of interest between GPs and LPs.”
- / **What we mapped:** The “Diversity, Equity, and Inclusion” section

Impact Investing Institute, Just Transition Criteria (III) 2023

- / Just transition framework for impact investors
- / “In partnership with 21 global financial institutions, the Impact Investing Institute designed a ‘first of its kind’ practical tool for fund managers who want to invest in a transition to a net zero world that prioritises the needs of the planet and the people living on it.”
- / **What we mapped:** Criterion 3: Positive contribution towards just transition objectives

International Finance Corporation, ESG Performance Indicators (IFC) 2021

- / Disclosure framework designed for emerging markets. The indicators are organized by Institution Type (financial institutions and corporates) and ESG Issues (environmental and social; and corporate governance) and reflected in four documents:
 - / Environmental and Social (E&S) Performance Indicators for Capital Markets - Financial Institutions
 - / Corporate Governance Performance Indicators for Capital Markets - Financial Institutions
 - / E&S Performance Indicators for Capital Markets - Corporates
 - / Corporate Governance Performance Indicators for Capital Markets - Corporates
- / “IFC’s ESG Performance Indicators are a sustainability data framework aimed at reducing the ESG data reporting burden and enhancing sustainability reporting in emerging capital markets.”
- / **What we mapped:**
 - » Institution Type indicators: Board Diversity (5); Diversity in Senior Management (6); Executive Compensation (19).



- » ESG Issues indicators: Gender Equality (10); Non-discrimination and Equal Opportunity (11); Workers' Organizations (13), Formal Provisions to Avoid Sexual Harassment at Work (14)

MSCI, Workforce Gender Diversity Index (MSCI Gender) 2023

- / Scores how the MSCI IMI Top 700 Index of Japanese companies attract, retain, and promote women in the workplace. While data collection for this Index is limited to Japan, there is no mention in the methodology of Japan-specific considerations. Therefore, it could have global applicability
- / “The MSCI Workforce Gender Diversity data set is designed to provide relevant and comparable datasets on workplace gender diversity.”
- / **What we mapped:** All indicators
- / **Weighting:** The Gender Diversity Performance Interim Score is calculated as a simple average of all available metric scores for each company. A disclosure discount is subsequently applied to adjust the interim score, accounting for gaps or limitations in reported data

***Refinitiv, Diversity and Inclusion Ratings (Refinitiv) 2021**

- / Diversity and inclusion ratings provided for over 12,000 public companies
- / “Diversity and Inclusion (D&I) ratings powered by Refinitiv ESG data are designed to transparently and objectively measure the relative performance of companies against factors that define diverse and inclusive workplaces.”
- / **What we mapped:** All indicators
- / **Weighting:** Refinitiv selects 24 measures that are relevant to diversity and inclusion out of more than 630 measures available in Refinitiv’s ESG database. Each of these measures is allocated to one of four pillars: diversity, inclusion, people development and controversies. The measures are dynamically weighted according to their availability within an industry or country. Values for three of the four pillars are then calculated using a weighted average of their constituent measures. A value for the controversies pillar is calculated as a simple average of its constituent measures. The overall D&I score for each company is the simple average of the four pillar scores

UN Conference on Trade and Development, Core Indicators for Sustainability and SDG Impact Reporting (UNCTAD) 2023

- / Disclosure framework to support the advancement of the Sustainable Development Goals (SDGs)
- / “The core SDG indicators cover the economic, environmental, social and institutional areas. They were identified based on key reporting principles, main reporting frameworks and companies reporting practices.”
- / **What we mapped:** The framework has four focus areas: Economic, Environmental, Social, and Institutional. We mapped the Social and Institutional areas



UN Research Institute for Social Development, Sustainable Development Performance Indicators (UN RISD SDPI) 2022

- / ESG guidance framework to support organizations in achieving the SDGs
- / “The project’s aim was to develop methodologies and indicators to meaningfully measure and evaluate the performance of a broad range of economic entities in relation to the vision and goals of the 2030 Agenda for Sustainable Development.”
- / **What we mapped:** Tier 2. B. Contextualizing impact and disclosing transformation potential - Socioeconomic area

UN Women & UN Environment Programme –Finance Initiative, Gender Equality and Empowerment of Women (GEWE) 2024

- / Framework aligned with banks’ commitments under the Principles for Responsible Banking to help close the gender gap
- / “Through the inclusion of a holistic framework for action, indicators to track progress, checklists, indicators and case studies, the guidance aims to enable banks to: Prioritise women’s empowerment as a cornerstone of and pathway to gender equality; Establish a holistic understanding of the ways banks can advance gender equality and women’s empowerment across its value chain; Act as advocates for gender equality, accelerating the alignment of financial flows with SDG 5 setting new standards within the financial industry.”
- / **What we mapped:** GE100 indicators on employee demographics; GE101 on gender equality strategy; GE102 on core policies and practices; and GE103 on benefits packages.

UN Women & UN Global Compact ,Women’s Empowerment Principles (WEP) 2017

- / Set of Principles for businesses on how to advance gender equality and women’s empowerment in the workplace, marketplace, and community.
- / “18 multiple choice questions that draw from good practices from around the world-covering gender equality in leadership, workplace, marketplace, and community. Topics covered by the assessment include: commitment to a gender equality strategy, equal pay, recruitment, supporting parents and caregivers, women’s health, inclusive sourcing, and advocacy for gender equality in communities of operation.”
- / **What we mapped:** All indicators

Workforce Disclosure Initiative, Survey Guidance (WDI) 2025

- / Survey of workforce practices across operations and supply chains. WDI was acquired by Thomson Reuters Foundation from ShareAction in 2024
- / “Since its establishment in 2016, the WDI has worked with institutional investors to improve corporate workforce transparency. Investor support has been vital in generating new workforce data, encouraging wider engagement



with companies, and promoting a greater understanding of the workforce topics covered in the annual WDI survey.”

- / **What we mapped:** Among the 13 sections of the survey, we mapped:
 - » Section 1 Governance: governance structure and management, board performance, and delegation of authority
 - » Section 2 Workforce Composition: structure and location of direct operations and contract types
 - » Section 4 Diversity and Inclusion: all topics
 - » Section 5 Workforce Wage Levels and Pay Gaps: all topics.
 - » Section 6 Stability: all topics
 - » Section 7 Workforce Development and Adaptation: training and development, the just transition, and technology, data, and automation
 - » Section 8 Health, Safety, and Wellbeing: mental health risks and safeguarding, worker wellbeing, and work-life balance
 - » Section 9 Worker Voice and Representation: freedom of association and collective bargaining, and worker voice
 - » Section 10 Grievance Mechanisms: covers grievance mechanisms

* **World Benchmarking Alliance, Gender Benchmark (WBA Gender) 2023**

- / Benchmark of 2,000 companies globally on gender-based discrimination across seven categories
- / “The Gender Benchmark has consciously sought to build on and align with the key existing standards, frameworks and indicators relevant to gender equality and women’s empowerment.”
- / **What we mapped:** All indicators
- / **Weighting:** WBA weights Governance and Strategy indicators (in relation to leadership, workplace, supply chain) the highest at 20%, followed by a 17.5% weighting each for Representation, Compensation and Benefits, Health and Well-being, and Violence and Harassment categories; and 5% weighting each for Marketplace and Community

* **World Benchmarking Alliance, Social Transformation Baseline Assessment (WBA Social) 2021**

- / An assessment of how 2,000 global companies address human rights and inequality
- / “Our Social Transformation Framework explains how we will assess and incentivize the 2,000 most influential companies to support the social transformation. It sets out expectations that companies should meet in order to leave no one behind, support the SDGs and help create a future that works for everyone.”
- / **What we mapped:** The following Core Indicators: CSI 10 Living wage fundamentals; CSI 11 Working hours fundamentals; CSI 12 Collective bargaining fundamentals; CSI 13 Workforce diversity disclosure fundamentals; and CSI 14 Gender equality and women’s empowerment fundamentals



- / **Weighting:** WBA weights CSI 10, CSI 13, CSI 14 one point each. Human rights due diligence indicators (CSI 4 and CSI 5), which we do not map, are weighted twice as much as all other indicators

* **World Benchmarking Alliance, Corporate Human Rights Benchmark (WBA CHRB) 2023**

- / A benchmark of 110-150 companies globally on human rights performance across five sectors
- / “The Corporate Human Rights Benchmark ranks companies globally on their human rights performance. It assesses what companies are doing to ensure respect for human rights—both within the ‘four walls’ of their business, as well as in their supply chains—through their policies, processes and practices, based on publicly available information.”
- / **What we mapped:** We mapped only Indicator D.2.1 on “Performance: Company human rights practices - Living wage
- / **Weighting:** All indicators within a measurement area are equally weighted, as are the elements within each indicator. To ensure comparability, element weights are proportionate to their number so that each indicator has a maximum achievable score of 1 (e.g., two elements weighted at 0.5 each; five elements weighted at 0.2 each). Indicator scores are calculated as the average of the element scores within that indicator. Scores are then normalized to a 0–100 scale

* **World Benchmarking Alliance, Digital Inclusion Benchmark Methodology (WBA Digital) 2026**

- / “A benchmark of 2,000 companies globally on digital inclusion across seven categories.”
- / “The aim of the Digital Inclusion Benchmark is to foster a trustworthy and inclusive digital transformation that respects human rights. This revised Digital Inclusion Benchmark methodology is used to assess and rank the world’s 200 most influential digital technology companies on their performance and impact across six measurement areas, inspired by the SDGs.”
- / **What we mapped:** Our mapping includes D02 Ethical artificial intelligence
- / **Weighting:** The benchmark assesses companies across five digital inclusion measurement areas, each composed of three indicators made up of 3–6 elements. Companies receive 1 point for each element that is met and 0 if unmet; all elements within an indicator are equally weighted. There is no partial credit. Each of the measurement areas carries equal weight in the overall benchmark score (16% each), while the Core Social Indicators are weighted at 20%. A company’s total score is the sum of its digital inclusion area scores and the Core Social Indicator score, with non-applicability determined based on business activities and industry context



UK and Europe

European Financial Reporting Advisory Group (EFRAG), European Sustainability Reporting Standards S1: Own Workforce Exposure Draft (ESRS) November 2025

- / The EU’s detailed rules for how companies must report on sustainability (ESG) information under the CSRD. This exposure draft incorporates feedback from a 90-day public consultation on an exposure draft published in July 2025. It represents a simplification of the standards that were originally adopted by the European Commission on July 31, 2023, as a Delegated Act under the CSRD and entered into force on January 1, 2024
- / “The objective of the [draft] Standard is...to ensure that the reporting requirements enable undertakings to disclose alignment with international and European human rights instruments and conventions, including the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights and the OECD Multinational Guidelines, the Charter of Fundamental Rights of the European Union, the Convention on Human Rights of the European Union, the European Social Charter (revised), EU policy priorities as set out by the European Pillar of Social Rights, and EU legislation, including the EU labour law acquis, the Sustainable Finance Disclosure Regulation and the EU taxonomy regarding sustainable finance, especially regarding the approach and reporting needs set out by the ‘minimum safeguards.’”
- / **What we mapped:** All of the indicators within the Draft Simplified S1 “Own Workforce” and indicator GOV 1 on “The role of the administrative, management and supervisory bodies in relation to sustainability” in ESRS 2 – General Disclosures

* The Social Investment Consultancy and EIRIS Foundation, Racial Equity Scorecard (TSIC & EIRIS RES) 2024

- / Ratings framework for assessing companies on their racial diversity data, targets, and practices to help investors drive change in public markets
- / “The scorecard contains 19 indicators across five themes for companies and can be used either as a standalone tool or to complement other environmental, social and governance (ESG) and diversity, equity and inclusion (DEI) indicators and benchmarks. There are four additional indicators specifically for asset owners with investment portfolios and asset managers in financial services. However, the scorecard is designed to be used in any sector or industry, with just one theme, Business Model, being sector specific. Each metric is scored using a points-based system, making it easy to evaluate your business.”
- / **What we mapped:** Two themes: (A) Governance and Strategy and (B) Workplace Culture and Agency
- / **Weighting:** Indicators are scored on scales ranging from 0–1 or 0–3, with higher



scores reflecting stronger policies, practices, and progress toward racial equity. The first four themes include “red flag” indicators that identify serious harmful actions or omissions requiring remediation, while the fifth theme applies a red or yellow flag to highlight current or past racial equity controversies that must be reviewed before assigning a final rating. The maximum attainable score is 26 for companies, 3 for portfolios, and 2 for asset managers

US

* [As You Sow, Racial Justice Scorecard 2024](#)

- / Scorecard for annually rating companies in the Russell 1000 by market capitalization in the US for performance on racial justice measures
- / “As You Sow’s Racial Justice team has examined the websites and social media platforms for each company in the Russell 1000 to determine if they made a racial justice statement, and how diversity, equity and inclusion are incorporated into their internal policies and external practices, including environmental justice.”
- / **What we mapped:** All indicators
- / **Weighting:** The Scorecard weights outcome-based action indicators 5x more than statement-based indicators. DEI department/leadership, promotion/retention/recruitment rates, and racial justice donations account for the top three more heavily weighted indicators

* [As You Sow & Whistle Stop Capital, Workplace Equity Scorecard 2025](#)

- / Scorecard for annually rating companies in the Russell 1000 across workplace issues
- / “The Workplace Equity Disclosure Initiative has reviewed the Russell 1000 constituent companies to identify which companies are currently releasing standardized, comparable and meaningful workplace equity data.”
- / **What we mapped:** All indicators
- / **Weighting:** The Scorecard weights disclosure indicators heavily to encourage company transparency; 25% of the overall score is solely based on whether the EEO-1 form was released

[ESG Data Convergence Initiative Metrics 2025](#)

- / Benchmark to drive convergence around sustainability indicators for private markets
- / “They focused on a data solution simple enough for the market to quickly adopt, broad enough to be applicable across all of private equity, and substantial enough to provide meaningful data.”
- / **What we mapped:** The following three categories (out of a total of eight): Diversity, Net new hires (the turnover metric), and Employee Engagement



Human Capital Management Coalition, Four Fundamental indicators (HCMC) 2021

- / Coalition of over 35 asset owners and asset managers in the United States and Europe (US\$6.6+ trillion AUM), which since 2020 has advocated with the US Securities and Exchange Commission for greater disclosure on human capital, focusing on these four indicators
- / “The HCMC believes that both universal, mandatory indicators and principles-based information are needed to provide investors with a complete picture of human capital management quality at individual companies. A balanced approach would allow investors to fully evaluate human capital management skills and identify risks and opportunities...The intent is that these four indicators work together to help investors evaluate a company’s human capital management skill and identify risks and opportunities.”
- / **What we mapped:** All indicators

* Human Rights Campaign, Corporate Equality Index (HRC CEI) 2025

- / LGBTQ+ benchmarking tool for US businesses
- / “Launched in 2002, the HRC Foundation’s Corporate Equality Index has become a roadmap and benchmarking tool for US businesses in the evolving field of lesbian, gay, bisexual, transgender and queer equality in the workplace. The HRC Foundation is committed to keeping the criteria for the CEI rigorous, fair and transparent by identifying emerging best practices that improve the experiences of LGBTQ employees of participating businesses. Equally important, we are committed to providing the resources and consultation that enable each business to attain a 100 percent rating.”
- / **What we mapped:** All indicators
- / **Weighting:** The combined indicators under Inclusive Family Benefits hold the most weight as a category (50 points); CEI is the only framework that deducts 25 points if companies fail to satisfy the Responsible Citizen criteria

* JUST Capital, Corporate Racial Equity Tracker (JUST Capital) 2022

- / Annual evaluation and ranking of the 100 largest US employers on racial equity measures
- / “JUST Capital has launched this Corporate Racial Equity Tracker to fill that gap and incentivize companies to take meaningful steps to advance racial equity. The first iteration offers an in-depth accounting of the state of disclosure by the 100 largest US employers, through 23 data points across six specific dimensions of racial equity.”
- / **What we mapped:** All indicators
- / **Weighting:** The data points are weighted by issues, with worker indicators weighted the most heavily at 39%, followed by communities at 20%, shareholders and governance at 19%, customers at 11%, and environment at 10%



MSCI, US Racial & Ethnic Diversity Data Set 2022 (MSCI-RACE)¹⁵³

- / Quantitative and qualitative data with a focus on race/ethnicity representation at the workforce and leadership levels for US companies. Unlike the frameworks of most other commercial data providers, this framework is publicly available
- / “The US Racial and Ethnic Data Set provides information on companies’ disclosure practices and policies with regards to racial and ethnic diversity. The coverage universe is the USA IMI [Investable Market Indexes] Index, i.e., approximately 2360 companies.”
- / **What we mapped:** All indicators

Oxfam America, Corporate Inequality Framework (Oxfam CIF) 2024

- / Framework to understand how large US corporations contribute to inequality trends
- / “Our framework attempts to find a middle ground between embracing this complexity while keeping the data manageable, and useful for interested stakeholders. Taking a holistic approach, we apply a variety of inequality lenses (economic, social, political, environmental) and analyze different assessment levels (policy, performance, disclosure). The result is a holistic Corporate Inequality Framework (CIF) that analyzes corporations across 78 indicators divided into four pillars: People, Power, Profits, and Planet.”
- / **What we mapped:** Pillar I: People; Pillar II: Power

PolicyLink, FSG, & JUST Capital, Corporate Racial Equity Alliance (CREA) 2024

- / Also called the Business Standards for 21st Century Leadership, is a voluntary framework of 14 standards developed by CREA, a coalition led by PolicyLink, FSG, and JUST Capital. This is the first edition of the CREA Standards, which will be finalized and launched in 2026. For analytical consistency in certain instances with CREA’s permission in this report we adapted the language of the standards.¹⁵⁴
- / “The development of corporate performance standards to advance equity, inclusion, and socially responsible business practices. Informed by extensive research and consultations with hundreds of stakeholders, the standards provide businesses with a clear roadmap to advance equity and inclusion, combat discrimination, and embody the best of socially responsible business within their organizations and across society.”
- / **What we mapped:** Standard 1 Governance and Leadership; Standard 2 Internal Infrastructure; Standard 3 Leadership and Board Skills; Standard 4, Culture; Standard 5 Workforce Diversity; and Standard 6 Job Quality





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