



4 Workplace Culture

PolicyLink

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Learn more about the Alliance and the draft standards in our latest report, *Introducing the Business Standards for 21st Century Leadership: Public Consultation Report and Draft Standards* available at <https://corporateracialequityalliance.org/corporate-standards>.

Reviewing and Submitting Feedback

How to Navigate This Standard

Each draft standard begins with an overview, including:

- The outcome that the standard supports achieving
- The basic requirement of the standard
- A list of the currently proposed performance targets for the standard
- The value proposition of adopting the standard
- The most closely associated equity outcomes, showing how achievement of the standard contributes to positive societal impact
- A non-exhaustive list of related sustainability standards and frameworks

Following the overview is a glossary of key terms. Then, each performance target is presented with specific requirements, metrics, implementation guidelines, and resources. To support companies in getting started, suggested interim targets and metrics are included as well.

Navigation links are provided at the bottom of each page, beginning on page 5.

Submitting Feedback

This is a living document and your participation in strengthening this work is important to us. Alongside our ongoing research and testing with companies, we look forward to feedback on these questions:

- Is the standard clear and compelling?
- Do you agree that the performance targets for this standard cover critical ways for companies to address discrimination and exclusion, and advance socially responsible business practices within the given topic? If not, why not?
- Are there additional or alternative performance targets you recommend for this standard?
- What additional guidance, if any, would be helpful for a company to get started and/or make steady progress toward achieving this standard?

Submit your feedback by completing [this survey](#) (letter submissions will also be accepted) or attending one of our virtual roundtables. [Find more information here on providing your feedback.](#)

4 Workplace culture fosters inclusion and belonging for all.




Requirement

■ Cultivate and maintain a workplace culture of inclusion and belonging for all workers.

Performance Targets

- P4.1** A formal anti-bias and anti-racism policy is adopted and operationalized.
- P4.2** An anonymous reporting and communication channel is implemented for direct workers to raise issues.
- P4.3** Cultural norms embodying equity, inclusion, and belonging are adopted and operationalized.
- P4.4** Workers across demographic groups report feeling safe and a strong sense of fairness, inclusion, and belonging at work.
- P4.5** Voluntary separation rates across demographic groups are steadily decreasing if not already low.
- P4.6** Workforce controversies are rare and addressed promptly and effectively.

Associated Equity Outcomes

-  Balanced Power
-  Health and Well-Being
-  Inclusive Representation and Narrative Change

Key Connections

- SDGs 3, 8, and 10
- ESRS S1
- IFRS S1
- UNGPs 15, 16, 17(b), 19, 20(b), 21, 22, 24, 28, 29, and 31

Business and Societal Value Proposition

Nurturing an organizational culture where the workforce feels safe, meaningfully heard, and able to give their best is vital to business success.

It is also one of the most effective ways to invest in and retain a diverse workforce. This involves building a culture that is equitable, inclusive, and fosters belonging for all—from championing inclusive working norms to adopting practices that combat discrimination and exclusion.

The imperative to cultivate a culture of inclusion and belonging is profound. In one study, [51% of women from marginalized racial and ethnic groups](#) experienced racism in their current workplace and the numbers are higher for women with darker skin tones, queer women, and transgender women. Inequitable and noninclusive workplace cultures [negatively affect the health of workers](#), [hamper productivity](#), and [increase costs for companies](#), including costs due to absenteeism, attrition, and discrimination claims. Underinvesting in culture may also undermine investments in workforce diversity and negatively impact trust among current and prospective talent.

Investing in a workplace culture that fosters inclusion and belonging, on the other hand, supports companies in becoming [an employer of choice for all](#), better meets the expectations of [today's belief-driven workforce](#), and [increases business resilience, especially in tough economic times](#).

The performance targets for this Standard therefore focus on adopting essential policies and practices that help foster a culture of inclusion and belonging, plus key measures that help illuminate whether the company is on the right track. Other key aspects of culture are also in Standards 1, 2, 3, 5, 6, and 12.

Glossary

Belonging

The values, practices, and policies that ensure no person is left out of the circle of human concern. As defined by the [Othering & Belonging Institute](#), belonging “means more than having just access, it means having a meaningful voice and the opportunity to participate in the design of political, social, and cultural structures.” [Learn more here](#).

Contingent workers

Individuals who are contracted to provide labor for the company, whether part-time, full-time, or on a temporary basis, such as gig workers, self-employed individuals, or workers from staffing agencies and other vendors.

Controversies

Lawsuits, arbitration demands, or other formal complaints against the company brought by one or more stakeholders (such as direct workers, indirect workers, customers, end users, suppliers, affected communities, or competent authorities). This includes, but is not limited to, labor disputes, discrimination claims, customer or end user complaints, and human rights or civil rights issues, whether reported to the company or to competent authorities.

Demographics or demographic groups

Characteristics of a specific human population, such as geographic location, socioeconomic status, race, ethnicity, gender, sexual orientation, disability, and age.

Direct workers

Individuals who are in an employment relationship with the company, such as full-time and part-time employees.

Disaggregate

To collect and separate compiled data into smaller units or subcategories so that component parts can be isolated and examined for trends and patterns (e.g., data organized by specific racial and ethnic groups versus “people of color” as a single grouping).

Disparity

A statistically significant difference in access, opportunity, use, or outcomes for one or more **demographic groups** that has no valid justification (i.e., cannot be explained by legitimate, nondiscriminatory business reasons). Disparities are indicative of unequal treatment and/or opportunities. In the context of the Standards, disparities can be addressed by adopting new systems, policies, and practices that promote fairness for all people regardless of their background.

Diversity

Of a group, possessing variation on the basis of social demographics, such as across race, ethnicity, gender, sexual orientation, disability, and age (e.g., a diverse workforce).

Equity

Just and fair **inclusion** into a society in which all can participate, prosper, and reach their full potential. When everyone is treated fairly according to their needs and no group of people is given special treatment.

Gap analysis

A comparative analysis of the current state of a set of quantitative or qualitative factors against a given Performance Target, including the Guidelines. Conducting such an analysis is step one across every Performance Target.

Impact

The effect the company has or could have on its **stakeholders** over the short, medium, or long term through its activities, including its operations, products, services, and business relationships, whether positive or negative, intended or unintended. This term is intended to be equivalent to the defined term “impacts” in the [European Sustainability Reporting Standards](#) (ESRS).

Inclusion

The values, practices, and policies that ensure all people, across all social demographics, feel respected, safe, and valued, including and accommodating people who have historically been excluded such as due to their race, ethnicity, gender, sexual orientation, or disability. Inclusion values and leverages **diversity**, recognizing it as a source of strength for organizations.

Intersectionality

The interconnected nature of inequality across social categorizations, such as race, ethnicity, gender, sexual orientation, disability, and class, which in turn results in overlapping and interdependent systems of discrimination or disadvantage for a given individual or group of people. As described by professor [Kimberlé W. Crenshaw](#) of Columbia Law School, who coined the term over 30 years ago, intersectionality is “[a lens... for seeing the way in which various forms of inequality often operate together and exacerbate each other.](#)”

Job function or type

The core set of activities or tasks an individual completes as part of the responsibilities of their position at the company, including daily duties, projects, and defined areas of oversight or management.

Leaders or leadership

Senior leaders, as defined below, plus:

- Middle management, including people managers who have oversight of, but are not directly managing, non-managerial workers; and
- Any other internal leaders with decision-making power over non-managerial workers.

Material decision

A decision made by the company that has or could have a significant **impact** on profitability/shareholder value and/or one or more of its stakeholder groups, including **direct workers, contingent workers**, indirect workers, customers, end users, communities, and society at large. This includes, among other things, the health and safety of the company's and its suppliers' workplaces; the health, safety, accessibility, and pricing of products and services; the environmental impacts of the company's and its suppliers' operations; and any practices that could result in excluding marginalized or underinvested groups from fair opportunities.

Non-managerial roles or workers

Independent contributors and other **direct workers** who do not oversee the company's operations or other workers, including but not limited to entry-level and frontline roles.

Psychological safety

The values, practices, and policies that effectuate a shared belief among members of a group (such as teams and organizations) that it is safe to express ideas, raise issues, ask questions, provide feedback, and admit mistakes without fear of retaliation or other negative consequences. [Learn more here](#) and [here](#). Team psychological safety is a term coined by professor [Amy C. Edmondson](#) of Harvard Business School based on 30-plus years of research.

Senior leaders or senior leadership

- Officers as defined in the company's bylaws;
- Named executive officers as defined under U.S. Securities and Exchange Commission reporting rules;
- C-Suite or equivalent senior leaders; and
- Leaders with overall ownership and responsibility for department or divisional budgets.

Stakeholders

Individuals and groups who have an interest in the policies and practices of companies not only because they are affected by them, but also because they have rights to be respected and protected by companies, e.g., workers' rights to fair wages, consumers' rights to safe products, suppliers' rights to transparency, investors' rights to be informed of material facts, communities' rights to clean and safe neighborhoods, and society's rights to a healthy environment, among others.

Underrepresented groups

A **demographic group** whose representation in a given setting or context is disproportionately low relative to their numbers in the general population. Historically underrepresented demographic groups in the private sector include people of color, women, LGBTQ+ people, and people with disabilities. The company should strive to maintain a current understanding of the demographic groups who may be underrepresented in the organization (whether in particular **job types** or at particular career levels) and/or in its industry, and take concrete action to promote equal opportunities for all.

Voluntary separation

The end of the employment relationship between a **direct worker** and the company, as initiated by the direct worker on their own accord. Voluntary separations include resignations, retirement, sickness, or death.

Voluntary separation rate

The percentage of voluntary separations of **direct workers** during a defined period, including new hires, calculated as the total number of voluntary separations, divided by the total number of direct workers at the beginning of the period, multiplied by 100.

PERFORMANCE TARGET 4.1

A formal anti-bias and anti-racism policy is adopted and operationalized.

Requirement

Codify and operationalize an enterprise-wide anti-bias and anti-racism policy.

Metric

One anti-bias and anti-racism policy consistent with the guidelines.

Share Progress & Achievement

Disclosure available to the public of the company's adoption of and commitment to the policy, either on the company's website or in an annual report (or other publicly available filing). Update disclosure in the event of substantial policy changes.

Rationale, Tips, and Guidelines**RATIONALE:**

Bias and discrimination in the workplace is a common issue that negatively **impacts** workers, [including affecting their health and wellness](#) and their career prospects. Workplace bias and discrimination also holds companies back from achieving their highest potential. Multiple studies have calculated the costs to U.S. companies to be in the billions of dollars annually, including costs from [attrition, disengagement, and less innovation](#). Black workers in particular are [two to four times more likely than other workers to perceive unfair treatment](#), but they are not alone: 16% of Asian workers, 17% of Hispanic/Latinx workers, and 8% of white workers have felt unfairly treated in the workplace due to their race or ethnicity. Proactively combating all forms of bias and discrimination is therefore essential to cultivating an equitable and inclusive workplace culture where everyone feels a sense of belonging. It is also essential to ensuring equal opportunities for all. Doing so starts with setting a strong foundation in a formal anti-bias and anti-racism policy and operationalizing the policy across the enterprise.

IMPLEMENTATION TIPS:

1. The policy should be in writing and formally approved by the most senior leader(s) with oversight of workplace culture and workforce wellbeing, as reflected by their signature(s) on the policy.
2. The policy should contain the following:
 - a. The company's commitment to a workplace free from bias and discrimination and an explanation of how the company's commitment aligns with its purpose, values, and goals, including having an equitable and inclusive workplace where all workers feel a sense of belonging. (Note: If the company does not already have a formal anti-harassment policy, also incorporate a commitment to a workplace

free from harassment.)

- b. The explicit prohibition of bias and discrimination based on race, ethnicity, gender, sexual orientation, disability, age, religion, national origin, socioeconomic status, and any other social category or protected characteristic.
- c. Named leadership accountability for adherence to the policy across the company, including the following expectations of all leaders:
 - i. Modeling the policy in daily practice.
 - ii. Promptly acting when issues are raised.
 - iii. Protecting those affected by discrimination.
- d. How and where to report issues, including one or more anonymous communication channels.
- e. How reported issues will be handled, monitored, and addressed.
- f. Regular reviews of business and workplace policies and practices against the principles of combating bias and discrimination of all forms.
- g. A commitment to support, promote, resource, and empower employee resource groups (ERGs) to foster a greater sense of community and belonging, promote their voice in the business, and position such groups as well-resourced catalysts of positive change.
- h. A requirement of regular anti-bias and anti-racism training for all leaders, including within new hire orientation and other regular learning and development programming. (Note: For senior leaders, consider aligning the cadence with Target 3.2 on senior leadership

skill building.)

- i. A commitment to annually provide training and other learning opportunities related to combating bias and discrimination that are easily accessible to all direct workers.
 - j. The process by which the policy, and ongoing adherence to it, will be periodically reviewed, including adequate resources for training.
3. Review the policy and the manner in which adherence is operationalized on an annual basis.
 4. At least annually, share the policy across the workforce, including how it is operationalized, how to raise issues related to it, and how to access learning opportunities.

Example Interim Targets

Note: these examples are not intended to be exhaustive. At launch, guidance on setting interim targets will be available.

- [Gap analysis](#) conducted of workplace policies and practices.
- New or updated anti-bias and anti-racism policy drafted and presented to applicable [senior leader\(s\)](#) for approval.
- Education and training on anti-bias and anti-racism policy for all [leaders](#) and across the company.

Example Interim Metrics

Note: some metrics may apply to more than one Example Interim Target; not necessarily one-to-one alignment.

- Record of gap analysis results shared with senior leadership.
- Final draft of new or updated anti-bias and anti-racism policy.
- Documentation of communication and training materials for all leaders.

Relevance to Other Frameworks

Coming with the launch of the final standards: mapping to other standards and frameworks addressing similar issues.

Resources

- [Exposé of Women’s Workplace Experiences Challenges Antiracist Leaders to Step Up](#) (Samantha E. Erskine, Sheila Brassel, and Kathrina Robotham, Catalyst, 2023)
- [Company Culture Is Everyone’s Responsibility](#) (Denise Lee Yohn, Harvard Business Review, February 2021)
- [Workplace Discrimination and Risk of Hypertension: Findings From a Prospective Cohort Study in the United States](#) (Jian Li, et al., Journal of the American Heart Association, April 2023)
- [Disrupt Bias Drive Value](#) (Sylvia Ann Hewlett, Ripa Rashid, and Laura Sherbin, Coqual, 2017)
- [Unconscious Bias Training That Works](#) (Francesca Gino and Katherine Coffman, Harvard Business Review, September–October 2021)
- [Select Task Force on the Study of Harassment in the Workplace](#) (Chai R. Feldblum & Victoria A. Lipnic, U.S. Equal Employment Opportunity Commission, June 2016)
- [Operational Recommendations Ethnic Diversity & Inclusion](#) (B4IG workstream on Diversity & Inclusion, Business for Inclusive Growth, October 2022)
- [The NLI Guide: How Culture Change Really Happens](#) (David Rock, Heidi Grant, and Mary Slaughter, Neuroleadership Institute, 2022)
- [The U.S. Surgeon General’s Framework for Workplace Mental Health & Well Being](#) (Office of the U.S. Surgeon General, U.S. Department of Health and Human Services, 2022)
- [Belonging Drivers & Elements: Primer](#) (Genevieve Smith, Jasmine Sanders, and Ishita Rustagi, Berkeley Haas Center for Equity, Gender & Leadership, 2022)

PERFORMANCE TARGET 4.2

An anonymous reporting and communication channel is implemented for direct workers to raise issues.

Requirement

Establish an anonymous reporting and communication channel accessible to all direct workers to report and receive support in resolving workplace issues, including unsafe working conditions, bias, harassment, and other discrimination.

Metric

At least one anonymous reporting and communication channel accessible to all direct workers consistent with the guidelines.

Share Progress & Achievement

Annual disclosure to the Board of the channel's utilization, the status of issues, manner of resolution, any trends, and concrete actions taken to address any trends.

Rationale, Tips, and Guidelines**RATIONALE:**

Ensuring that direct workers at all levels are easily able to safely report and receive support in resolving issues related to unsafe working conditions, bias, harassment, and other discrimination, supports the company's success by mitigating human capital risk. Doing so also meets the company's fundamental responsibility to cultivate a safe and supportive workplace culture for all.

While many companies have formal reporting channels for such workplace issues, [few workers use them](#) due to fear of retaliation and low trust that companies will address their issues fairly. Establishing anonymous reporting *and* communication channels—meaning workers need not disclose their identity in reporting an issue as well as in the process of resolving the issue—is key to use of internal complaint mechanisms. Consider, for example, that [46% of LGBT workers](#) have experienced unfair treatment at work at some point in their lives, yet few report such issues. Further, a report by the U.S. Equal Employment Opportunity Commission found that [70% of workers](#) who experience harassment based on their race, gender, disability, and other protected characteristics do not report such issues internally.

Unless workers feel safe in reporting issues—from risks to their physical and psychological safety to bias, harassment, and other discrimination—serious issues may go unchecked. And ultimately, unchecked issues cost workers and the company, including litigation costs and other drags on the bottom line such as [lower productivity](#), [increased turnover](#) and [even increased healthcare costs](#).

IMPLEMENTATION TIPS:

1. For smaller companies, if resources are limited, consider starting with implementing a one-way anonymous reporting tool (such as an ethics violation reporting system that includes reporting on other types

of workplace issues).

2. See the [draft data supplement for Standard 4 here](#) for helpful data on the workplace experiences of historically [underrepresented groups](#).

GUIDELINES:

1. The reporting and communication channel may be a technology tool (either a standalone tool or integrated into the company's broader ethics violation reporting system) and/or an [ombuds office](#) (an independent, informal, and neutral source of support for workers).
2. If a digital tool is selected, ensure it is accessible and usable by all, including by individuals with disabilities, and regardless of the location of workers (remote or on-site).
3. The channel must have controls to keep workers safe from retaliation, including protection of anonymity beginning from the submission of a report through all communications leading to the resolution of the issue to the satisfaction of the reporting worker. If a digital tool is selected, its functionality should include two-way end-to-end encrypted anonymous communication to facilitate the resolution of issues to the satisfaction of reporting workers.
4. Annually provide enhanced training for team members involved in the administration of the channel and the resolution of issues, including training on trauma-informed leadership, repairing harm, and preventing retaliation.
5. At least annually, promote awareness of the channel through enterprise-wide communications, in shared spaces, and across internal digital networks, including the following:
 - a. The purpose of the channel (i.e., to report and resolve unsafe working conditions, bias,

- harassment, and other discrimination).
- b. How to use the channel.
 - c. How anonymity will be protected.
 - d. How issues will be resolved.
 - e. Confirming that retaliation is prohibited.
6. Annually measure awareness of the 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 (see Target 4.4).
 7. 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.

Example Interim Targets

Note: these examples are not intended to be exhaustive. At launch, guidance on setting interim targets will be available.

- [Gap analysis](#) conducted of policies and practices related to reporting and resolving workplace issues.
- Human resources, legal, DEI, compliance, and other relevant teams collaborate to implement the communication channel.
- Training completed for [leaders](#) and other direct workers on the purpose of the communication channel, how to use it, and how reported issues will be managed and resolved to ensure workers are safe from retaliation.

Example Interim Metrics

Note: some metrics may apply to more than one Example Interim Target; not necessarily one-to-one alignment.

- Record of gap analysis results shared with [senior leadership](#).
- Documentation of implementation plans.
- Documentation of communication and training materials for leaders.

Relevance to Other Frameworks

Coming with the launch of the final standards: mapping to other standards and frameworks that address similar issues.

Resources

[Do Your Employees Feel Safe Reporting Abuse and Discrimination?](#) (Lily Zheng, Harvard Business Review, October 2020)

[Why Every Leader Needs to Worry About Toxic Culture](#) (Donal Sull, et al., MIT Sloan Management Review, March 2022)

[Promoting a Culture of Open Communication Through Anonymous Hotlines](#) (Strategic Management Services, LLC, April 2018)

[LGBT People’s Experiences of Workplace Discrimination and Harassment](#) (Brad Sears, et al., UCLA School of Law Williams Institute, September 2021)

[Understanding the Effects of Discrimination in the Workplace](#) (Ellyn Maese and Camille Lloyd, Gallup, May 2021)

[One in Four Black Workers Report Discrimination at Work](#) (Camille Lloyd, Gallup, January 2021)

[The Trust Gap: Expectation vs Reality in Workplace Misconduct & Speak Up Culture](#) (Vault Platform, 2021)

[Strengthening Accountability for Discrimination](#) (Jenny R. Yang and Jane Liu, Economic Policy Institute, January 2021)

[2023 Trust Survey: 9 Key Findings and Lessons for Business Executives](#) (PwC, 2023)

PERFORMANCE TARGET 4.3

Cultural norms embodying equity, inclusion, and belonging are adopted and operationalized.

Requirement

Codify, promote, and practice cultural norms embodying [equity](#), [inclusion](#), and [belonging](#) for all.

Metrics

Policy metric: One culture code (or code of conduct) consistent with the guidelines.

Practice metrics: Percentage of [direct workers](#) highly rating (i) the culture code and (ii) its embodiment in practice in annual culture and engagement surveys, [disaggregated](#) across [demographic groups](#) and business units (in compliance with applicable laws).

Share Progress & Achievement

Annual disclosure to the workforce of culture and engagement survey results, including sentiments about the culture code and successes and/or areas for improvement in day-to-day practice.

Annual disclosure to the Board of the percentage of direct workers highly rating the culture code and its embodiment in practice, disaggregated across demographic groups and business units.

Avoid sharing disaggregated demographic data when group sizes are too small to ensure individual anonymity (typically $N < 25$).

Rationale, Tips, and Guidelines

RATIONALE:

A culture code formalizes in writing the ways of working that are valued and should be adhered to by workers at all levels—from how decisions are made to incentivizing issue-spotting and promoting productive and respectful daily interactions. It serves the purpose of establishing clear working norms that foster equity, inclusion, and belonging for all, which in turn helps ensure that everyone feels safe, respected, motivated, and valued. [With the workplace among the most important sources of community for workers](#), this is more important than ever. Doing so is also the company's [best defense against compliance risk](#) and consistent with investor expectations of [more proactive efforts to create inclusive cultures](#). It also supports the company's overall success: [According to one study](#), “[c]ompanies that proactively manage culture demonstrate revenue growth over a 10-year period that is, on average, 516% higher than those who do not.”

IMPLEMENTATION TIPS:

1. Many companies already have a formal code of conduct. The guidelines below may be incorporated in such existing documents.
2. The most successful culture code is one that is shaped with input from the workforce, fully supported by leaders, and meets the needs of workers at all levels, especially [non-managerial workers](#).
3. A sample culture code consistent with the guidelines below will be included with this Target upon the launch of the final Standards.

GUIDELINES:

1. The culture code should be in writing, address at least the seven topics listed below, and developed through engagement with workers at all levels.
2. **Culture code topics:** At a minimum, the culture code should cover each of the seven topics listed below. A few examples are provided for each topic, though they are not intended to be exhaustive.
 - a. **Values, purpose, and goals**, such as:
 - i. All teams will connect their annual goals to the company's values, purpose, and organizational goals.
 - ii. All direct workers will connect their annual individual goals to the company's values, purpose, and overall goals.
 - b. **Sense-making and issue-spotting**, such as:
 - i. Ideas and feedback from non-managerial workers regarding ways to optimize, improve, and innovate are valued and incentivized, and inform senior leaders' decisions.

- ii. Identifying and raising issues promptly are valued and incentivized.
- c. **Decision-making**, such as:
 - i. Direct workers will have the opportunity to provide advice or input regarding [material decisions](#) that affect their work environment and conditions of work.
 - ii. Leaders will seek input from non-managerial workers prior to making certain decisions regarding job quality and worker experience (such decisions determined collaboratively and informed by what is most important to workers).
- d. **Meetings and other interactions**, such as:
 - i. All workers will be treated with respect and dignity.
 - ii. Everyone has a role to play in combating bias and subtle acts of exclusion (also known as microaggressions).
 - iii. Continuous learning will be supported through availability of ongoing training.
 - iv. [Inclusive meeting norms](#) and norms around other daily interactions are established and published company-wide (such as not interrupting others, taking time to seek input from all attendees, and ensuring multiple ways for all to engage).
- e. **Navigating internal and external crises** (e.g., internal crises, such as layoffs and restructuring; external crises, such as wars and other conflicts), such as:

- i. Space will be created for workers to process internal and external crises.
- ii. Communications will be frequent and clear in times of crises. (See Target 12.3 on communication preparedness.)
- iii. Leaders will demonstrate competency in having difficult conversations and taking clear stances. (See Target 3.2 on leadership skill building.)
- f. **Celebrations**, such as:
 - i. Culture champions and strong allyship are celebrated and rewarded.
 - ii. Heritage months and cultural holidays based on interfaith calendars will be acknowledged and celebrated.
- g. **Rest**, such as:
 - i. Rest is valued and all workers are required to take time off to do so.
 - ii. From time to time, the company takes collective rest (such as reset weeks and holiday shutdown periods).
 - iii. Working through holiday periods is discouraged.
- 3. Broadly share the culture code across the workforce, including with [contingent workers](#), through enterprise-wide communications and posting it in highly visible shared spaces and digital networks.
- 4. If multiple languages are spoken at the company, translate the culture code into such languages as well.
- 5. On an annual basis, direct workers (especially non-managerial workers) should have the opportunity to provide feedback on what is working well in the

culture code, what needs to improve, and ideas they may have to continue advancing equity, inclusion, and belonging. Such feedback may be sought via culture and engagement surveys (see Target 4.4).

Example Interim Targets

Note: these examples are not intended to be exhaustive. At launch, guidance on setting interim targets will be available.

- [Gap analysis](#) conducted of workplace cultural norms.
- New culture code (or updated code of conduct) drafted and finalized in collaboration with workers at all levels.
- More than half of business units use the culture code and report working better together via annual culture and engagement surveys.
- More than half of direct workers highly rate the culture code and affirm its embodiment in day-to-day work and interactions via annual culture and engagement surveys.

Example Interim Metrics

Note: some metrics may apply to more than one Example Interim Target; not necessarily one-to-one alignment.

- Record of gap analysis results shared with [senior leadership](#).
- Documentation of culture code (or code of conduct).
- Percentage of business units using the culture code and reporting working better together.
- Percentage of direct workers highly rating the culture code and affirming its embodiment in day-to-day work and interactions.

Relevance to Other Frameworks

Coming with the launch of the final standards: mapping to other standards and frameworks that address similar issues.

Resources

[Understanding the Effects of Discrimination in the Workplace](#) (Ellyn Maese and Camille Lloyd, Gallup, May 2021)

[How the Best Bosses Interrupt Bias on Their Teams](#) (Joan C. Williams and Sky Mihaylo, Harvard Business Review Magazine, November–December 2019)

[Disrupt Bias Drive Value](#) (Sylvia Ann Hewlett, Ripa Rashid, and Laura Sherbin, Coqual, 2017)

[Fighting Backlash to Racial Equity Efforts](#) (Rosalind M. Chow, et al., MITSloan Management Review, June 2021)

[Infographic: Diversity + Inclusion = Better Decision Making at Work](#) (Erik Larson, Cloverpop, accessed May 2024)

[New Research: Inclusive Decision-Making Increases Performance of Diverse Global Companies](#) (Erik Larson, Cloverpop, September 2017)

[Research: People Can Learn to Recognize Their Racial Privilege](#) (Anyi Ma, Sean Fath, and Ashleigh Shelby Rosette, Harvard Business Review, August 2022)

[What Is Psychological Safety?](#) (Amy Gallo, Harvard Business Review, February 2023)

[Creating Psychological Safety for Black Women at Your Company](#) (Agatha Agbanobi and T. Viva Asmelash, Harvard Business Review, May 2023)

[Curriculum: Bridging to Belonging](#) (Blueprint for Belonging, Othering & Belonging Institute, accessed May 2024)

[Company Culture Is Everyone's Responsibility](#) (Denise Lee Yohn, Harvard Business Review, February 2021)

[The U.S. Surgeon General's Framework for Workplace Mental Health & Well Being](#) (Office of the U.S. Surgeon General, U.S. Department of Health and Human Services, 2022)

[Quality Jobs Framework](#) (Jobs for the Future, 2023)

[Empowering Workplace Culture Through Recognition](#) (Gallup and Workhuman, 2023)

[Diversity Wins: How Inclusion Matters](#) (Sundiatu Dixon-Fyle, et al., McKinsey, May 2020)

[Advancing DEI Initiatives: A Guide for Organizational Leaders](#) (Gallup, 2022)

[Global Culture Survey 2021: It's Time to Take Action](#) (PwC, 2021)

[The NLI Guide: How Culture Change Really Happens](#) (David Rock, Heidi Grant, and Mary Slaughter, Neuroleadership Institute, 2022)

[The Yin and Yang of Organizational Health](#) (Lili Duan, Rajesh Krishnan, and Brooke Weddle, McKinsey, November 2017)

[Inclusive Workplaces Focus on Management Practices That Matter, Not Fluff](#) (Aaron De Smet, Drew Goldstein, and Ruth Imose, McKinsey, June 2021)

PERFORMANCE TARGET 4.4

Workers across demographic groups report feeling safe and a strong sense of fairness, inclusion, and belonging at work.

Requirement

Annual culture and engagement survey scores reflect 80% or more of [direct workers](#) across [demographic groups](#) reporting feeling physically safe; [psychologically safe](#); and a strong sense of fairness (i.e., [equity](#)), [inclusion](#), and [belonging](#).

Metric

Percentage of direct workers reporting feeling (i) physically safe; (ii) psychologically safe; and (iii) a strong sense of fairness, inclusion, and belonging, [disaggregated](#) across [demographic groups](#) (in compliance with applicable laws).

Share Progress & Achievement

Annual disclosure to the workforce of survey results and any actions being taken to improve results over time, including ways the workforce can contribute.

Annual disclosure to the Board of survey results and progress toward achieving the Target, including (i) current and last three years' survey results, disaggregated across demographic groups and departments, (ii) whether there are [disparities](#) across any groups or departments, and (iii) any concrete actions being taken to improve performance.

In all cases, avoid sharing disaggregated demographic data when group sizes are too small to ensure individual anonymity (typically N < 25).

Rationale, Tips, and Guidelines

RATIONALE:

It is long-established that a healthy and positive workplace culture benefits both workers and companies, [including contributing to the company's financial results](#) and [fostering greater innovation](#). It is also essential to attracting and retaining a diverse workforce. Regular and meaningful measurement of direct workers' engagement and sentiments of workplace culture will help the company succeed across all of its goals, especially in cultivating a culture of inclusion and belonging for all workers.

IMPLEMENTATION TIPS:

1. Many companies already employ culture and engagement surveys on an annual or other periodic basis. The guidelines below may be incorporated in such existing practices.
2. Standards 1, 2, 3, 5, 6, and 12 include other key aspects of workplace culture—from corporate purpose and values to cross-functional collaboration, leadership skills, talent management practices,

incentive structures, and communications. Making progress across those Standards will support success here.

3. A sample culture and engagement survey consistent with the guidelines below will be included with this Target upon the launch of the final Standards.

GUIDELINES:

1. On at least an annual basis, conduct a culture and engagement survey of all direct workers measuring sentiments of physical safety, psychological safety, fairness, inclusion, and belonging in the workplace.
2. Follow these best practices in designing, deploying, and sharing the results of such surveys:
 - a. **Survey design:**
 - i. Ensure the survey is anonymous, easy to take, scientifically backed, and not associated with any external award or recognition.
 - ii. Include optional demographic questions to support disaggregated analysis of results across at least race, ethnicity, gender, sexual orientation, disability, age, geography, in-person versus remote, and by department, in all cases in compliance with applicable data privacy laws.
 - iii. Ensure third party survey providers clearly specify how their survey encompasses physical safety, psychological safety, fairness, inclusion, and belonging in the workplace.

b. Survey deployment:

- i. Broadly communicate the purpose of the survey, the desire for candid feedback, how anonymity will be honored, who will be able to review responses, and the level of detail that will be visible.
- ii. Provide dedicated (paid) time for direct workers to complete the survey, such as during regular meetings or other times during the regular workday.
- iii. Ensure [leaders](#) steer clear of any forms of coercion in encouraging participation. (Note that [participation rates at or close to 100% at medium to large organizations could indicate coercion.](#))

c. Survey results:

- i. Review responses by department and disaggregated across demographic groups, in compliance with applicable data privacy laws.
 - ii. Apply an [intersectional](#) lens in the analysis of results.
 - iii. Identify any disparities across demographic groups and on an intersectional basis, especially wherever there are low or mediocre scores.
 - iv. If demographic group sizes within departments are too small to protect the anonymity of respondents (typically N < 25), avoid sharing such data.
3. To meet this Target, achieve positive and strongly positive responses on each of physical safety, psychological safety, fairness, inclusion, and belonging questions from at least 80% of direct

workers across demographic groups, including at least across race, ethnicity, gender, sexual orientation, disability, and age.

4. Concrete action is required if there are any disparities in scores or if positive and strongly positive responses are collectively below 80% for the overall workforce. The company should determine the most appropriate course of action based on its circumstances, which may include the following:
 - a. Analyzing the data to determine whether there are any trends, such as higher or lower scores within a particular business unit, department, or location; or associated with a particular [job function or type](#), remote versus in-office workers, or frontline versus desk-based roles.
 - b. Ensuring leadership is accountable for cultivating a culture of safety, fairness, inclusion, and belonging (see Target 3.4). This may include providing leaders constructive feedback, developing a tailored action plan for improvement, and investing in coaching and ongoing professional development (see Target 3.2). Notwithstanding providing leaders with the time and resources to improve over time, ensure that recurring issues or significant problem areas are addressed right away. One of the fastest ways to erode trust and increase risk is to leave ongoing issues unaddressed.
5. When sharing survey results with the Board, share first with the committee that has oversight of talent practices, typically the compensation committee. (See Targets 1.2 and 1.3 on Board oversight.)
6. Though this Target applies to direct workers, if the company has a [contingent workforce](#), it should also measure the sentiments of such workers, though it may do so via alternative means if there are legal impediments to including contingent workers in the

same survey as direct workers.

Example Interim Targets

Note: these examples are not intended to be exhaustive. At launch, guidance on setting interim targets will be available.

- [Gap analysis](#) conducted of culture and engagement survey practices and past results.
- 60% or more of direct workers report feeling physically safe; psychologically safe; and a strong sense of fairness, inclusion, and belonging, with decreased (if any) disparities across demographic groups compared with prior years' results.
- 70% or more of direct workers report feeling physically safe; psychologically safe; and a strong sense of fairness, inclusion, and belonging, with few or no disparities across demographic groups compared with prior years' results.

Example Interim Metrics

Note: some metrics may apply to more than one Example Interim Target; not necessarily one-to-one alignment.

- Record of gap analysis results shared with [senior leadership](#).
- New or updated culture and engagement survey(s) consistent with the guidelines.
- Current and prior years' culture and engagement survey results, disaggregated across demographic groups.

Relevance to Other Frameworks

Coming with the launch of the final standards: mapping to other standards and frameworks that address similar issues.

Resources

[A Systems Approach to Worker Health and Wellbeing](#) (Joy Inouye and John Dony, The Campbell Institute, National Safety Council, 2017)

[2023 Workplace Wellness Research](#) (Mental Health America, 2023)

[Using Survey Data to Drive Inclusion and Leader Accountability](#) (Stephanie Andel and Caitie Jacobson, Dell, March 2023)

[How to Share Employee Engagement Survey Results](#) (Lexi Croswell, Culture Amp, accessed May 2024)

[Listen to Lead: Raise Retention and Boost Business](#) (Ford Foundation and Provoc, 2023)

[Intersectionality: When Identities Converge](#) (C. Ramos and S. Brassel, Catalyst, December 2020)

[Research: To Excel, Diverse Teams Need Psychological Safety](#) (Henrik Bresman and Amy C. Edmondson, Harvard Business Review, March 2022)

[State of the Global Workplace 2023 Report: The Voice of the World's Employees](#) (Gallup, 2023)

[In the Market: How to Harness the Benefits of Corporate Diversity](#) (Paritosh Bansal, Reuters, June 2023)

[2023 Edelman Trust Barometer Special Report: Trust at Work](#) (Edelman, 2023)

[Advancing Belonging in Organizations](#) (Genevieve Smith, Jasmine Sanders, and Ishita Rustagi, BerkeleyHaas Center for Equity, Gender & Leadership, Berkeley, accessed May 2024)

PERFORMANCE TARGET 4.5

Voluntary separation rates across demographic groups are steadily decreasing if not already low.

Requirement

Annually analyze [voluntary separation rates](#) of [direct workers](#) and take concrete action to steadily decrease such rates if not already below 20% across [demographic groups](#).

Metric

Current and past three years' voluntary separation rates [disaggregated](#) across at least race, ethnicity, gender, sexual orientation, disability, and age.

Share Progress & Achievement

Annual disclosure to the Board of voluntary separation rates and progress toward achieving the Target, including (i) current and last three years' rates, disaggregated across demographic groups and departments; (ii) whether there are [disparities](#) across any groups or departments; and (iii) concrete actions being taken to decrease rates, if not already low.

Avoid sharing disaggregated demographic data when group sizes are too small to ensure individual anonymity (typically $N < 25$).

Rationale, Tips, and Guidelines**RATIONALE:**

While voluntary separation rates may be a reflection of multiple factors, including broader economic and labor force trends, they are also a powerful indicator of the cultural health of an organization. [According to one study](#), a toxic corporate culture—characterized by workers feeling disrespected; unethical behavior; and a failure to promote diversity, equity, and inclusion—is the strongest predictor of voluntary separations and is many times more important than other factors.

In addition, high rates of voluntary separations (in general, [rates over 20%](#)) are costly to companies due to the loss of institutional knowledge, the organizational disruption, and the added costs of rehiring and training. Experts estimate that the average cost to replace an employee can range from [one-half to two times their annual salary](#). [According to one study](#), the cost of turnover (including voluntary separations) resulting from perceived unfair treatment on the basis of race or ethnicity alone cost U.S. companies [about \\$172 billion](#) over a five-year period. Accordingly, regularly measuring and taking concrete action to avoid high voluntary separation rates not only supports the company's overall success but also helps in identifying and addressing recurring cultural issues that may be barriers to building a culture of inclusion and belonging.

IMPLEMENTATION TIPS:

1. The terms “attrition” and “turnover” are often used interchangeably to refer to voluntary separations alone and/or to the combination of voluntary and involuntary separations. Whatever term the company may use, ensure there is internal alignment that this

Target focuses on *voluntary* separations only.

2. The company's efforts to make progress here can be connected to its efforts under Target 5.4, which focuses on tracking *both* voluntary and involuntary separation rates (collectively defined as turnover in the Standards) and Target 7.4, which focuses on identifying and addressing business model red flags.
3. Making progress on the other Targets in this Standard, as well as on Standards 3, 5, and 6, which are focused on leadership skills, talent management systems, and job quality, will also support success here.

GUIDELINES:

1. On at least an annual basis, measure and analyze voluntary separation rates of direct workers across demographic groups, including at least across race, ethnicity, gender, sexual orientation, disability, and age.
 - a. Disaggregate results by demographic groups and by business unit, department, geography, [job function or type](#), remote versus in-office workers, frontline versus desk-based roles (as applicable).
 - b. Apply an [intersectional](#) lens in the analysis of results.
 - c. Identify any disparities across demographic groups and on an intersectional basis.
 - d. Identify any trends, such as higher or lower rates within a particular business unit, department, or location; based on tenure; or associated with a particular job function, remote versus in-office workers, or frontline versus desk-based roles (as applicable).
 - e. For large companies, measuring more

frequently (such as quarterly or monthly) is recommended to more promptly identify and address potential issues.

2. To meet this Target, voluntary separation rates should either be (i) below 20% annually, or (ii) steadily decreasing annually, in each case, across demographic groups, including at least race, ethnicity, gender, sexual orientation, disability, and age.
3. Concrete action is required if there are any disparities in voluntary separation rates or if such rates are at or above 20% on an annual basis. The company should determine the most appropriate course of action based on its circumstances, which may include the following:
 - a. Conducting stay interviews and exit interviews to help determine the source of high separation rates for affected groups.
 - b. Implementing or adopting one or more actions based on learnings from stay and/or exit interviews.
 - c. Investing in offering more development and advancement opportunities (see Standard 5).
 - d. Investing in improving job quality (see Standard 6).
 - e. Making progress on Target 7.4 related to addressing business model red flags.
4. When sharing direct worker separation data with the Board, share first with the committee that has oversight of talent practices, typically the compensation committee. (See Targets 1.2 and 1.3 on Board oversight.)
5. Though this Target applies to direct workers, if the company has a [contingent workforce](#), it should also track voluntary separation rates of such workers,

including across demographic groups where possible, and take concrete action where the source of issues stems from the company's own policies and practices.

Example Interim Targets

Note: these examples are not intended to be exhaustive. At launch, guidance on setting interim targets will be available.

- [Gap analysis](#) conducted of current and last three years' voluntary separation rates.
- Demographic data gathering and disaggregation is implemented in the company's human resources information system (HRIS) in line with Target 2.4 (disaggregating people-related data).
- Annual goals set to steadily decrease voluntary separation rates and any disparities across demographic groups.

Example Interim Metrics

Note: some metrics may apply to more than one Example Interim Target; not necessarily one-to-one alignment.

- Record of gap analysis results shared with [senior leadership](#).
- HRIS reflects data disaggregated across demographic groups.
- One or more goals established to annually decrease voluntary separation rates.

Relevance to Other Frameworks

Coming with the launch of the final standards: mapping to other standards and frameworks that address similar issues.

Resources

[This Fixable Problem Costs U.S. Businesses \\$1 Trillion](#) (Shane McFeely and Ben Wigert, Gallup, March 2019)

[Toxic Culture Is Driving the Great Resignation](#) (Donald Sull, Charles Sull, and Ben Zweig, MIT Sloan Management Review, January 2022)

[SHRM Report Press Release: Racial Inequity Persists, Costs American Workplaces Billions Annually](#) (SHRM, May 2021)

[Why Every Leader Needs to Worry About Toxic Culture](#) (Donald Sull, et al., MIT Sloan Management Review, March 2022)

[Addressing Employee Burnout: Are You Solving the Right Problem?](#) (Jacqueline Brassey, et al., McKinsey, May 2022)

[Corporate America's Revolving Door for Black Employees](#) (Erica Pandey, Axios, November 2020)

[Black Workers Face Higher Levels of Workplace Attrition at Every Level](#) (McKinsey, June 2020)

[Organizational Culture and Employee Retention](#) (John E. Sheridan, The Academy of Management Journal, 1992)

[Job Openings and Labor Turnover \(JOLTS\) Home Page](#) (U.S. Bureau of Labor Statistics, accessed May 2024)

[The High Costs of Staff Turnover](#) (The Economist, September 2018)

[Are You Overlooking Your Greatest Source of Talent?](#) (Robin Erickson, Denise Moulton, and Bill Cleary, Deloitte Review, July 2018)

[Retaining Frontline Talent Through Career Mobility and Growth](#) (Deloitte, 2022)

PERFORMANCE TARGET 4.6

Workforce controversies are rare and addressed promptly and effectively.

Requirement

Annually analyze workforce [controversies](#), take concrete action to steadily decrease such controversies (if any) annually, and ensure those that occur are addressed promptly and comprehensively.

Metric

Number and types of workforce controversies for the current year and past three years, with [demographics](#) of affected workers and status of resolution.

Share Progress & Achievement

Annual disclosure to the Board of the (i) number, types, status, and manner of resolution of workforce controversies for the current and past three years, with demographics of affected workers; (ii) whether there are recurring issues and/or [disparities](#) across any groups or departments; and (iii) concrete actions being taken to reduce workforce controversies.

Avoid sharing disaggregated demographic data when group sizes are too small to ensure individual anonymity (typically $N < 25$).

(Disclosures related to this Target are not intended to require disclosure of any information under attorney client privilege or attorney work product protections.)

Rationale, Tips, and Guidelines**RATIONALE:**

Workforce-related controversies—from discrimination claims to safety incidents and labor disputes—can cause severe consequences for the affected workers, negatively impact workplace culture, and hamper the company’s overall success. In 2021 alone, workplace misconduct cost U.S. businesses and the economy an estimated [\\$8.5 billion just based on unproductive hours](#), with 15% of workers reporting taking time off work in the past 12 months (on average, 6 days) because they personally experienced or witnessed workplace misconduct. Adding in the costs of managing and resolving claims, addressing organizational disruption, and other stressors on the workforce, substantially increases these already negative business impacts. A high number of workforce controversies and frequently recurring types of controversies are also indicators of culture issues. Therefore, regularly tracking workforce controversies, taking concrete action to steadily decrease them, and ensuring those that occur are addressed promptly and comprehensively are all critical for the overall wellness of the workforce and the cultural health of the organization.

IMPLEMENTATION TIPS:

1. This Target recognizes that perfection is not always possible. While the company should always aim for zero workforce controversies, it is just as important to promptly and effectively address controversies if and when they arise.

2. Because workforce controversies do not typically happen at regular or expected intervals, and because the [impact](#) of controversies can be long-lasting, this Target considers performance over the last three years in addition to the current year.
3. Making progress on Targets 4.2 and 4.3, focused on implementing an anonymous reporting and communication channel and adopting new cultural norms, can help surface issues early on and contribute to reducing the incidence and severity of controversies.
4. See Targets 7.3, 8.4, and 10.5 for controversies related to customers and end users, indirect workers, and communities, respectively. The guidelines below are designed to be consistent with such Targets so they can be implemented together.
5. Though not the main focus of this Target, tracking material fines, sanctions, and compensation that the company pays to resolve workforce controversies is also important.

GUIDELINES:

1. This Target applies to both [direct workers](#) and [contingent workers](#).
2. Annually track and analyze the number, types, status, and manner of resolution of workforce controversies, including the demographics of affected workers at least across race, ethnicity, gender, sexual orientation, disability, and age.
 - a. Categorize controversies by their severity, including (i) the nature of the claim or issue, (ii) the impact on workers, (iii) the impact on the company, and (iv) whether they are due to policies and practices (i.e., systemic in nature) or rogue actors.

- b. Disaggregate controversies by demographic groups and by business unit, department, geography, job function or type, remote versus in-office workers, and frontline versus desk-based roles (as applicable).
 - c. Apply an intersectional lens in the analysis of results.
 - d. Identify any disparities across demographic groups and on an intersectional basis, such as in the outcomes of controversies.
 - e. Identify any trends, such as in severity or higher or lower rates within a particular business unit, department, or location; based on tenure; or associated with a particular job function, remote versus in-office workers, or frontline versus desk-based roles (as applicable).
 - f. For large companies, measuring more frequently (such as quarterly or monthly) is recommended to more promptly identify and address recurring issues.
3. To meet this Target, workforce controversies should be (i) addressed promptly and comprehensively and either (ii) steadily decreasing in number compared against the last three years, including across at least race, ethnicity, gender, sexual orientation, disability, and age, or (iii) [below the benchmark for the company's industry]. *(Note to reviewers: this guideline, in particular, is undergoing further research and testing.)*
4. Addressing controversies promptly and comprehensively requires the following:
- a. Promptly conducting fair and impartial investigations where necessary or advisable.
 - b. Taking prompt action in the event of inappropriate conduct.
 - c. Ensuring reporting workers and workers who cooperate with the investigation are not retaliated against.
 - d. Ensuring efforts to mitigate liability do not conflict with or hamper the company's responsibility to protect affected worker(s) and treat them fairly.
 - e. Where possible, confirming the satisfaction of affected workers in the resolution of controversies by soliciting their confidential feedback.
5. Concrete action is required if there are a high number of workforce controversies generally, or a high number of controversies in a particular department/location or of a particular type, or if there are any disparities in affected workers. The company should determine the most appropriate course of action based on its circumstances, which may include the following:
- a. Acting on troubling patterns (such as particular types of issues frequently arising or controversies arising from the same department(s)).
 - b. Ensuring that controversies are resolved equitably, discipline is consistent, and no undue favor is given to any particular team member.
 - c. Implementing or adopting one or more actions based on lessons learned, such as improving talent management approaches and/or how controversies are handled and resolved.
6. When sharing workforce controversy data with the Board, follow the lead of your Legal team or counsel

to ensure confidentiality and attorney client privilege are protected. (See Targets 1.2 and 1.3 on Board oversight.)

Example Interim Targets

Note: these examples are not intended to be exhaustive. At launch, guidance on setting interim targets will be available.

- **Gap analysis** conducted of the number, types, status, and manner of resolution of workplace controversies over the last three years.
- Legal and/or HR teams track workforce controversies, including the number, types, status, manner of resolution, and demographics of affected workers.
- **Leadership** training conducted on preventing and effectively addressing workforce controversies, informed by any recurring issues in the company's context.
- Meaningful year-over-year reduction in workplace controversies.

Example Interim Metrics

Note: some metrics may apply to more than one Example Interim Target; not necessarily one-to-one alignment.

- Record of gap analysis results shared with **senior leadership** and the Board.
- Data tracker with high-level stats of workforce controversies.
- Documentation of leadership training.
- Number and types of workforce controversies for the current year and past three years, with demographics of affected workers and status of resolution.

Relevance to Other Frameworks

Coming with the launch of the final standards: mapping to other standards and frameworks that address similar issues.

Resources

[The Trust Gap: Expectation vs Reality in Workplace Misconduct & Speak Up Culture](#) (Vault Platform, 2021)

[Strengthening Accountability for Discrimination](#) (Jenny R. Yang and Jane Liu, Economic Policy Institute, January 2021)

[How to Avoid Discrimination Lawsuits](#) (Matt Gonzales, SHRM, August 2022)

[Understanding the Effects of Discrimination in the Workplace](#) (Ellyn Maese and Camille Lloyd, Gallup, May 2021)

[One in Four Black Workers Report Discrimination at Work](#) (Camille Lloyd, Gallup, January 2021)

[Select Task Force on the Study of Harassment in the Workplace](#) (Chai R. Feldblum and Victoria A. Lipnic, U.S. Equal Employment Opportunity Commission, June 2016)

[U.N. Guiding Principles on Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Frameworks](#) (United Nations Human Rights, Office of the High Commissioner, United Nations, 2011)

[Companies are Spending Big Money to Cover Up Bullying and Discrimination in the Workplace—It’s Time for Shareholders to Know Exactly How Much](#) (Ariella Steinhorn, Amber Scolah, and Chelsey Glasson, Forbes Commentary, June 2023)

[To Make Lasting Progress on DEI, Measure Outcomes](#) (Lily Zheng, Harvard Business Review, January 2023)

[Sustainable Investing – Understanding Controversies](#) (Sustainalytics and Scotia iTrade, 2017)

[MSCI ESG Controversies and Global Norms Methodology](#) (MSCI ESG Research, MSCI, November 2023)

[Corporate Controversies That Defined 2022](#) (Sterling Carter, et al., ISS ESG, December 2022)

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