2 Internal Infrastructure

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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.

2 Internal infrastructure is established for long-term success.

Requirement

Establish and maintain the internal infrastructure necessary to advance equity and inclusion, combat discrimination, and adopt socially responsible business practices.

Performance Targets

P2.1 All business units have appropriate resources to fulfill their annual priorities on advancing equity, inclusion, and socially responsible business.

P2.2 Key leaders and teams are coordinated and aligned.

P2.3 Physical and virtual spaces are accessible for all.

P2.4 People-related data is disaggregated and analyzed across demographic groups.

P2.5 Human rights assessments integrating equity considerations are conducted regularly.

P2.6 An independent third-party civil rights audit is undertaken on a regular basis.

Associated Equity Outcomes

Equitable Governance and Leadership

Accountability Through Transparency

Reckoning and Repair

Key Connections

- SDGs 5, 8, 10, and 16
- ESRS 2 and S1
- IFRS S1
- UNGPs 11, 15-22, 23(a) and (b)

Business and Societal Value Proposition

Advancing equity and inclusion, combating discrimination, and adopting socially responsible business practices across the enterprise are long-term efforts.

It is therefore vital for companies to establish the appropriate internal infrastructure to sustain their efforts—from the allocation of human and budgetary resources to adopting key data analytics, due diligence, and assessment practices. Consistent focus and investment may also protect the company in tough economic times: In a study of the 2008 Great Recession, companies that stayed the course in their inclusion efforts *flourished financially,* while those that did not suffered significant financial losses.

Adopting this Standard will help companies ensure resources are allocated properly, organizational focus is aligned, and course-correction can occur with greater agility. Proactively investing in internal infrastructure also signifies the long-term thinking necessary for business resilience and sustainable value creation that drives shareholder value while serving all of the company's stakeholders.

Without the appropriate internal infrastructure, companies risk underperforming against their goals, creating internal confusion, eroding trust, wasting valuable resources, and missing the opportunity to address issues before they become serious business risks. Moreover, meaningful and consistent progress in advancing equity, inclusion, and social responsibility is unlikely without the appropriate internal infrastructure in place.

The performance targets for this Standard therefore focus on appropriately resourcing the company's efforts, ensuring key teams are working in alignment, and establishing the necessary data and assessment practices to support long-term success.

Glossary

Civil rights

The rights of individuals to "be free from unfair treatment or discrimination in the areas of education, employment, housing, credit, voting, public accommodations, and more—based on certain legally protected characteristics identified in a variety of state and federal laws," as defined by civil rights leader Laura W. Murphy. In the U.S., Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act of 1990, and the Age Discrimination in Employment Act of 1967 are the key civil rights laws applicable to businesses, and together they prohibit employment discrimination based on race, color, religion, sex, national origin, disability, and age.

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.

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.

Form EEO-1

A mandatory annual data collection by the U.S. Equal Employment Opportunity Commission (EEOC) that requires all private sector employers with 100 or more employees, and federal contractors with 50 or more employees meeting certain criteria, to submit demographic workforce data, including data by race/ethnicity, sex, and job categories to the EEOC. Learn more here.

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.

Human rights

The range of rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. These rights are listed in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights) and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. These rights are elaborated further in international human rights instruments focusing on the rights of indigenous peoples; women; national or ethnic, religious, and linguistic minorities; children; people with disabilities; and migrant workers and their families. The role of business respecting these rights is set out in the UN Guiding Principles on Business and Human Rights (UNGP) and the Ten Principles of the UN Global Compact.

Human rights assessment

A human rights assessment identifies and assesses actual or potential adverse human rights impacts with which a company may be involved through its own activities or as a result of its business relationships. (UNGP Principle 18)

Human rights due diligence

Human rights due diligence means assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed. Human rights due diligence includes, but is not limited to, human rights assessments. (UNGP Principles 17 and 18-21)

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.

Indirect workers

Individuals performing work in the company's value chain, including (i) through suppliers of products or services used in the development of the company's products and services; (ii) business partners, such as resellers, distributors, systems integrators, and marketers of the company's products and services; and (iii) vendors and any other individuals, entities, or groups the company uses and relies on to operate the company and execute its business model, from conception to delivery, consumption, and end-of-life of the company's products and services. This term is intended to align with the defined term "value chain worker" in the ESRS.

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.](#)"

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.

Low-income communities

Communities where many residents are economically insecure. In the U.S., economic insecurity means living on income at or below 200% of the federal poverty level, which is equivalent to $30,120 annually for a single individual household or $62,400 annually for a family of four in 2024. [See the 2024 poverty thresholds here](#).

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.

People of color and communities of color

The term **people of color** includes all people who are of a race/ethnicity other than non-Hispanic white. This includes people who are Black, Indigenous (or Native American), Asian American and Pacific Islander, Latinx, Arab-Middle Eastern American, multiracial, and immigrants of color. The term **communities of color** refers to groups of people of color within neighborhoods, cities, or regions.

Salient or saliency

Salience refers to the **human rights** that are at risk of the most severe adverse **impacts** as a result of the company's activities or business relationships. [Learn more here](#).

A human rights *saliency* assessment identifies and prioritizes a company's actual and potential adverse human rights impacts based on their scope (number of people impacted), scale (gravity of the impact), and remediability (whether those impacted can be restored).

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.

Stakeholder-informed decision-making

The action or process of making decisions, especially **material decisions**, informed by the needs, expectations, and rights of the company's stakeholders—including **direct**, **contingent**,

and **indirect workers**; customers; end users; suppliers; shareholders; communities; and society at large. Stakeholder-informed decision-making recognizes that each of the company's stakeholders is essential to its success and honors the company's fundamental commitment to deliver value to all of its stakeholders. This is the foundation of socially responsible business.

Sustainability

As defined by the 1987 United Nations Brundtland Commission, "meeting the needs of the present without compromising the ability of future generations to meet their own needs." In the business context, it means a company's delivery of long-term value in financial, social, environmental and ethical terms. This includes recognizing and adhering to social thresholds, such as paying living wages across the workforce, in recognition of the essential role living wages play in cultivating and maintaining a healthy labor force and a stable society. It also includes ecological thresholds, such as limiting emissions and natural resource use, in recognition of the natural limits of our planet to support all life.

PERFORMANCE TARGET 2.1

All business units have appropriate resources to fulfill their annual priorities on advancing equity, inclusion, and socially responsible business.

Requirement

Annually allocate the appropriate financial and human resources for all business units to fulfill their priorities on advancing equity, inclusion, and socially responsible business.

Metric

Annual budget reflecting financial and human resources for all business units consistent with the guidelines.

Share Progress & Achievement

At least annual disclosure to the Board and workforce on how the company resources its strategy and goals to advance equity, inclusion, and socially responsible business.

Rationale, Tips, and Guidelines

RATIONALE:

One of the greatest barriers to progress in advancing equity, inclusion, and socially responsible business practices is insufficient resourcing behind company commitments. Without the appropriate financial and human resources in place, steady progress in advancing equity and inclusion, combating discrimination, and adopting socially responsible business practices across the enterprise is unlikely.

Too often, investments in these areas are treated as "nice to have" and therefore among the first to get cut during resource-constrained periods. The cost, however, is high—from losing hard-won gains to demotivating top talent, eroding the trust of stakeholders, falling behind peers, and compromising the company's credibility as an authentic champion of socially responsible business.

It is precisely in tough times that the company's investments in these areas matter most. Accordingly, this Target focuses on the importance of appropriately and consistently resourcing the company's efforts for the long-term, including being prepared for and persevering through tough times.

IMPLEMENTATION TIPS:

1. This Target does not aim to define how business units or departments should be staffed or organized. Some companies may establish resources for one or more dedicated individuals or groups within each business unit, others may have a centralized team that supports all business units.

2. Considering the appropriate resources for the company's efforts will be informed by how teams are currently organized and how they might work better together. Target 2.2 addresses relevant team connections and structure. Consider involving the same team members in the adoption of this Target.

3. Take care to ensure relevant team members are not overtaxed, burning out, or wearing too many hats in establishing priorities—not only is it detrimental to their well-being but it also hampers progress.

4. If priorities continue getting pushed out and/or the achievement of goals are lagging for one or more teams, it may be a sign they are insufficiently resourced. If this cannot be addressed promptly, consider a time-based plan to address resource issues over time.

GUIDELINES:

1. Annually determine the appropriate financial and human resources for all business units to achieve their priorities on equity, inclusion, and socially responsible business, including by taking the following concrete steps:

   a. Engage relevant **leaders** and team members to determine the resources needed to achieve their annual priorities.

   b. Ensure such resources are commensurate with being part of the core business strategy.

   c. Ensure such resources are consistent with Target 1.4 on leadership goals.

   d. Establish one or more alternative resourcing plans that are responsive to multiple scenarios in the event resources become constrained. Thinking ahead in this way can help mitigate the risk of overly aggressive cuts in down times and support relevant teams in adapting quickly to challenging circumstances.

2. At a minimum, all senior leaders should have the resources they need for building diverse teams and fostering an inclusive culture. (See Standard 4 on culture and Standard 5 on workforce diversity.)

3. Integrate final resource determinations in annual budgets at the company level and for each business unit (or department, as applicable).

4. In the event of a resource-constrained period, make good faith efforts to activate alternative resourcing plans before cutting support for any priorities.

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' resource allocations across business units.

➜ Financial and human resources increased or newly allocated for one or more business units to meet their annual priorities.

➜ Plan developed to consistently resource annual priorities across business units, including scenario planning for resource-constrained periods.

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**.

➜ Annual budget reflecting increased or newly allocated resources for one or more business units.

➜ Documentation of an enterprise-wide resourcing plan with multiple scenarios.

Relevance to Other Frameworks

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

Resources

[Study Finds that 62 Percent of Organizations Devote Little to No Resources to Diversity, Equity, and Inclusion](#) (BCSSW News, Boston College School of Social Work and SHRM, December 2022)

[How to Prepare Your Company For a Recession](#) (Claire Hastwell, Great Place To Work, February 2020)

[Now Is Not the Time to Give Up On DEI](#) (David Michels, Forbes, May 2023)

[The Essential Link Between ESG Targets & Financial Performance](#) (Marc W. Pfitzer, Harvard Business Review Magazine, September–October 2022)

[Integrated Thinking Principles: Value Creation through Organizational Resilience](#) (Value Reporting Foundation, August 2022)

[Transition to Integrated Thinking: A Guide to Getting Started](#) (Value Reporting Foundation, August 2022)

[Integrated Reporting Framework](#) (IFRS Foundation, January 2021)

PERFORMANCE TARGET 2.2

Key leaders and teams are coordinated and aligned.

Requirement

Proactively ensure key leaders and teams (including DEI, human rights, civil rights, and sustainability teams) are coordinated in their efforts and aligned in their strategies and goals through multiple concrete steps.

Metric

Number of coordination and alignment approaches adopted consistent with the guidelines.

Share Progress & Achievement

At least annual disclosure to the workforce and Board of cross-team coordination, goals alignment, challenges, and progress made.

Rationale, Tips, and Guidelines

RATIONALE:

All functions and departments that focus on managing, supporting, and tracking the company's treatment of and impact on stakeholders should be working in alignment to advance equity and inclusion and champion socially responsible business practices. Such functions and departments may go by varying names, but should include teams focused on DEI, human rights, civil rights, and sustainability. Such teams not only share common goals but also have the potential for greater impact when working together in mutually reinforcing ways. The alternative—working in silos—risks misalignment on goals and unnecessary competition for resources and attention.

IMPLEMENTATION TIPS:

1. The goal of this Target is for all relevant teams to understand how their respective goals and initiatives relate to each other and support the company's overarching equity, inclusion, and social responsibility strategies.

2. Because this Target aims to break down silos and ensure that no function or team is operating in conflict with (or independently of) the company's objectives, it is advisable to be over-inclusive regarding the individuals, teams, and leaders to include in adopting this Target.

3. Getting started could involve relevant functional leads or departments spending time getting to know each team's work and building relationships.

4. Be ready to iterate and adapt over time as teams grow and evolve and as circumstances change.

GUIDELINES:

1. Proactively ensure key leaders and teams are coordinated in their efforts and aligned in their

strategies and goals by (a) bringing together the right individuals and teams and (b) adopting multiple coordination and alignment approaches as outlined below.

2. On bringing together the right individuals and teams, take the following concrete steps:

   a. Include employee resource groups, DEI councils, the corporate philanthropy team, and any other social impact-focused teams, as applicable.

   b. If the company does not have dedicated leaders or teams focused on DEI, human rights, civil rights, and/or sustainability, then senior leaders and team members in each business unit should determine how they will connect DEI, human rights, civil rights, and sustainability within their work. This may involve assigning responsibility to an individual or group within each business unit.

   c. Include operational functions (e.g., legal, compliance, procurement, human resources) wherever they are typically involved or desire to be involved to ensure the successful implementation of overall strategies.

3. On coordination and alignment approaches, adopt at least one approach from each of the four categories below. The approaches are focused on increasing cross-functional interaction, sharing knowledge and resources, defining shared goals, and establishing clear reporting lines. They are not intended to be exhaustive. Engage team members in adapting and designing additional approaches suited to the company's unique context.

a. Establish and increase regular interaction, such as:

    i. Regularly holding informal group gatherings to foster increased understanding and stronger working relationships.

    ii. Establishing a regular cadence of communications across teams on goals, initiatives, progress made, and lessons learned.

    iii. Establishing a regular cadence of meetings across teams to deepen relationships, learn from each other, and build mutually reinforcing strategies.

b. Share knowledge and resources, such as:

    i. Establishing a shared repository for teams to stay abreast of each other's work, share knowledge and resources, and track shared goals.

    ii. Establishing a shared repository for the workforce containing information and resources on how teams are working together and ways teams can support each other.

    iii. Ensuring internal and external communications about DEI, human rights, civil rights, and sustainability work demonstrate how teams are connected and working in concert.

c. Define and operationalize shared goals, such as:

    i. Annually developing shared goals that together reach the entire enterprise and adopting team strategies that contribute to achieving those goals.

    ii. Regularly presenting progress on shared goals to senior leadership and the Board.

    iii. Developing a collective map of how shared goals and team strategies adhere or contribute to the United Nations (UN) Sustainable Development Goals (SDGs), the Universal Declaration of Human Rights (UDHR), and the UN Guiding Principles on Business and Human Rights (UNGPs).

d. Establish clear reporting lines, such as:

    i. Establishing one or more dotted-line reporting structures.

    ii. Establishing a cross-functional committee with decision-making authority.

    iii. Establishing a centralized team.

4. Annually evaluate the sufficiency of teams included and the efficacy of coordination and alignment approaches by soliciting feedback from relevant teams and designing improved approaches based on their feedback.

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 organizational structure and cross-team coordination and alignment.

➔ Three of the coordination and alignment approaches adopted from the guidelines.

➔ Over five coordination and alignment approaches adopted from the guidelines.

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 plans to adopt one or more of the approaches in the guidelines.

➔ Number of coordination and alignment approaches adopted from the guidelines.

Relevance to Other Frameworks

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

Resources

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

Making it Stick: A Guide for Establishing Effective DEI Infrastructure (W.K. Kellogg Foundation Expanding Equity Program, W.K. Kellogg Foundation, October 2023)

Blueprint for Corporate Sustainability Leadership (UN Global Compact, 2010)

Integrated Thinking Principles: Value Creation through Organizational Resilience (Value Reporting Foundation, August 2022)

The Essential Link Between ESG Targets & Financial Performance (Marc W. Pfitzer, Harvard Business Review Magazine, September–October 2022)

Embracing the Pilot Mindset: A Guide to Use Pilots to Improve DEI Initiative Success (W.K. Kellogg Foundation, October 2023)

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

PERFORMANCE TARGET 2.3

Physical and virtual spaces are accessible for all.

Requirement

Proactively ensure company-controlled physical and virtual spaces are accessible for all through multiple concrete steps, including conducting an accessibility assessment and soliciting regular feedback from stakeholders.

Metrics

Documentation of accessibility assessment results for all company-controlled physical and virtual spaces.

Percentage of **direct workers** who report being able to access physical and virtual spaces to the same degree as their colleagues.

Share Progress & Achievement

Disclosure available to the public of the company's commitment to accessibility and the ways in which the company operationalizes its commitment, either on the company's website or in an annual report (or other publicly available filing).

Disclosure to the workforce of any concrete actions being taken to improve accessibility of physical and virtual spaces.

Rationale, Tips, and Guidelines

RATIONALE:

Without intentional investments in accessibility across the enterprise, efforts to advance equity, inclusion, and social responsibility will still be *exclusive*, because they will fail to include people with disabilities. Being an equal opportunity employer therefore requires a focus on disability inclusion alongside, and integrated within, advancing diversity, equity, and inclusion for all. Disability inclusion is also critical for the company's suppliers and customers, helping to ensure business opportunities are fair for all and that products can be accessed and enjoyed without barriers. The imperative to invest in accessibility has also never been stronger—companies that lead on disability inclusion also lead in financial performance.

Yet people with a disability who are actively seeking work are unemployed at twice the rate as other job seekers. Despite the groundbreaking enactment of the Americans with Disabilities Act in 1990, there is much more progress to be made to truly ensure equal opportunities for people with disabilities.

Investing in the accessibility of company-controlled physical and virtual spaces is one key area where more progress is needed. This includes providing accommodations to workers who need them (such as telecommuting options) and making modifications to spaces to ensure people with disabilities can independently navigate to the same degree as others (such as integrating accessibility into websites).

Doing so can have cascading positive effects for others as well as for the company, including attracting and retaining top talent; improving productivity and morale; expanding the

customer base; and improving supplier diversity. In short, investments in accessibility activate the curb-cut effect.

IMPLEMENTATION TIPS:

1. This Target is focused on the technical aspects of promoting accessibility to ensure that all people who access the company's physical and virtual spaces can do so with ease. In particular, it supports ensuring workers with disabilities are able to bring their best to the workplace to the same degree as their colleagues.

2. Regardless of the company's resources or size, making workplace accommodations for people with disabilities need not be a high cost exercise. Research shows that workers often may not require more than what may already be available to others in the organization, such as flexible work schedules, telecommuting options, and/or a restructured workstation.

3. Adopting Standards 3 (leadership and board skills), 4 (workplace culture), 5 (talent management), 6 (job quality), 7 (products and services), and 8 (value chain) are also vital for the company's disability inclusion efforts, including helping to ensure workplace culture is inclusive, opportunities to grow and advance are fair for all, benefits offerings meet all workers' needs, and products and services are accessible.

4. On the launch of the final Standards, this Target will aim to incorporate recognition for companies already achieving progress on leading disability inclusion benchmarks and standards, such as Disability:IN's Disability Equality Index.

GUIDELINES:

1. Proactively ensure company-controlled physical and virtual spaces are accessible for all by taking the concrete steps outlined below, related to (a) conducting accessibility assessments, (b) soliciting

feedback from stakeholders, (c) taking concrete action to address gaps in accessibility based on assessments and feedback, (d) regularly communicating on workplace accessibility, and (e) maintaining accessibility as physical and virtual spaces change over time.

2. On conducting accessibility assessments, take at least the following concrete steps:

   a. Conduct an initial assessment of the company's physical and virtual spaces to identify any gaps in accessibility, with at least the following in scope:

      i. Floor plans of all physical spaces with detailed notes on components that can be modified to make physical spaces more accessible.

      ii. Outdoor spaces, entry ways, and all signage and posters.

      iii. Internal- and external-facing IT and communications systems, including talent recruitment and vendor recruitment platforms/sites and related collateral, product/service marketing collateral and employee training practices.

      iv. Confirm all workplace technology tools are accessible and that assistive technologies the company may make available are in fact compatible with existing workplace technology tools.

      v. Assess emergency protocols as well as procedures for company-sponsored events and outings.

      vi. Check in with workers who have requested accommodations to confirm

they feel fully equipped to be successful.

   b. If the company engages a third-party firm to conduct or support its assessment(s), ensure the engagement is led and staffed by a seasoned and diverse team with demonstrated expertise in disability inclusion, including equitable stakeholder engagement.

3. On soliciting feedback from stakeholders, take at least the following concrete steps:

   a. For direct workers, annually solicit feedback on the accessibility of the workplace, including: (i) whether they feel they have the resources they need to be successful; (ii) whether they can comfortably access all physical and virtual work spaces to the same degree as their colleagues; and (iii) any ideas they have to improve accessibility.

   b. For suppliers, customers, and end users (as applicable), periodically solicit feedback on the accessibility of the company's physical and virtual spaces, including ideas they may have to improve accessibility.

   c. If soliciting feedback via a survey, follow the best practices for such surveys set forth in Target 4.4, including ensuring that all feedback is anonymous.

   d. If the company engages a third-party firm to conduct or support obtaining feedback from stakeholders, Guideline 2.b. applies.

4. Concrete action is required if there are accessibility gaps or opportunities to improve based on the assessments and/or feedback from stakeholders. The company should determine the most appropriate course of action based on its circumstances and widely communicate the actions it has taken or will

undertake to address such feedback.

5. On at least an annual basis, ensure all direct workers are aware of and know how to request reasonable accommodations by proactively making accommodation options known through company-wide communication channels.

6. In the event physical and/or virtual spaces change in ways that could affect accessibility (e.g., office upgrades, renovations, moves, or new digital tools or systems), integrate an accessibility assessment in connection with making such changes and take concrete action to maintain accessibility in the course of such changes.

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 accessibility policies and practices.

➔ Scope of initial accessibility assessment finalized and assessment team engaged.

➔ Initial plan prepared to improve accessibility of physical and virtual spaces based on the outcome of the initial assessment.

➔ One or more concrete actions taken to improve accessibility of physical and virtual spaces based on workforce feedback.

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 scope of work for initial accessibility assessment.

➔ Documentation of time-based plan(s) to improve accessibility of physical and virtual spaces.

➔ Documentation of concrete action(s) taken to improve accessibility based on stakeholder feedback.

Relevance to Other Frameworks

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

Resources

The Disability Inclusion Imperative (Accenture, Disability:IN, and American Association of People with Disabilities, 2023)

Getting to Equal: The Disability Inclusion Advantage (Accenture, Disability:IN, and American Association of People with Disabilities, 2018)

Guidance on the Americans with Disabilities Act (ADA) Accessibility Standards (U.S. Access Board, accessed May 2024)

Guidance on the Architectural Barriers Act (ABA) Accessibility Standards (U.S. Access Board, accessed May 2024)

Developing an Accessible Workplace (Society for Human Resources Management, accessed May 2024)

Executive Order on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce (Joseph R. Biden Jr., White House Executive Order 14035, June 2021)

Providing an Accessible Workplace (Special Operations Division, Office of Federal Operations, U.S. Equal Employment Opportunity Commission, accessed May 2024)

Creating an Accessible and Welcoming Workplace (Employer Assistance and Resource Network on Disability Inclusion, accessed May 2024)

Costs and Benefits of Accomodation: Low Cost, High Impact Report (Job Accommodation Network, April 2024)

What Every Employer Should Know About Hiring and Engaging People With Disabilities (Ruby Storm Green, Great Place to Work, February 2023)

2023 Disability Equality Index Report (Disability:IN and American Association of People with Disabilities, 2023)

Accessibility Fundamentals Overview (Web Accessibility Initiative, World Wide Web Consortium, accessed May 2024)

WCAG 2 Overview (Web Accessibility Initiative, World Wide Web Consortium, accessed May 2024)

WCAG 3 Introduction (Web Accessibility Initiative, World Wide Web Consortium, accessed May 2024)

The Curb-Cut Effect (Angela Glover Blackwell, Stanford Social Innovation Review, Winter 2017)

PERFORMANCE TARGET 2.4

People-related data is disaggregated and analyzed across demographic groups.

Requirement

Where aligned with data privacy compliance obligations and any applicable laws on the storage and tracking of demographic data, **disaggregate** and analyze people-related data across **demographic groups**.

Metrics

Process metric: All people-related data repositories contain and use demographic disaggregation functionality.

Practice metric: People-related data analytics are informed by disaggregated data.

Share Progress & Achievement

Annual public disclosure of **Form EEO-1** (or equivalent).

At least annual disclosure to the Board of people-related data analytics disaggregated across demographic groups (e.g., workforce diversity, culture and engagement survey results, supplier diversity, customer/end user experience).

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

Rationale, Tips, and Guidelines

RATIONALE:

Greater rigor in gathering and analyzing data is a key component of knowing where the company stands against its **impact** goals and whether meaningful progress is being made. A fundamental step is disaggregating and analyzing people-related data across demographic groups (in line with data privacy compliance obligations and any applicable laws on the storage and tracking of demographic data).

Adopting data disaggregation as a business practice will help in ensuring there are no **disparities** across stakeholder demographic groups and, if any arise, will support the company in taking concrete action to address such disparities. Data disaggregation will also directly support the company's efforts in assessing performance across the Standards, including related to talent management, supplier practices, and stakeholder engagement.

IMPLEMENTATION TIPS:

1. Ensure team members understand what to do and not do from a data privacy compliance and equity perspective, including that stakeholders should be informed of, and consent to, any data that is collected about them.

2. If the company is already subject to governmental reporting requirements involving disaggregated people-related data (e.g., Form EEO-1), external disclosures should not require a significant resource investment.

3. This Target **does not** call for the re-identification of any de-identified data. Such data is not in scope.

GUIDELINES:

1. Step one is carefully understanding the scope and quality of existing people-related data, ensuring compliance with relevant privacy and data protection laws, and ensuring the company is engaging equitably with **stakeholders** who may be providing their data.

2. At a minimum, this Target requires disaggregating and analyzing people-related data:

   a. Related to the composition of the **direct workforce**;

   b. Across race, ethnicity, gender, sexual orientation, disability, and age; and

   c. With an **intersectional** lens.

3. In collecting people-related data, take the following concrete actions:

   a. Determine and document the scope and type of people-related data that is relevant and **salient** for the company to gather, prioritizing the interests and voices of workers, suppliers, customers, end users, and communities, along with shareholders.

   b. Update relevant forms for data collection to allow voluntary submission of demographic information, in compliance with data privacy laws.

   c. With respect to direct workers, ensure they are informed of the opportunity to self-identify, the purpose of doing so, and how confidentiality will be protected. See the following guides on how to promote self-identification with due care for key team members: LGBTQ+ inclusive self-ID and disability inclusive self-identification.

4. In analyzing people-related data, take the following concrete actions:

    a. Apply an intersectional lens in the analysis of disaggregated people-related data.

    b. If there are disparities across demographic groups, promptly and carefully determine why and take concrete action to mitigate such disparities.

    c. On at least an annual basis, disaggregated internal reports should be produced to keep senior leaders apprised of the company's progress against its stated goals. However, avoid sharing demographic data when group sizes are too small to ensure individual anonymity (typically N < 25).

5. In any reporting on disaggregated people-related data:

    a. Senior leadership should be aligned on the format, channels, and cadence of internal and external reporting of disaggregated data.

    b. For external disclosures, ensure the information is available in a form and location that is clear and accessible to all stakeholders, including but not limited to shareholders.

6. Where possible, disaggregating and analyzing demographic data related to **contingent workers**, customers, end users, **indirect workers**, and other stakeholders is also important, subject to data privacy compliance obligations and any applicable laws on the storage and tracking of demographic data.

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 people-related data disaggregation practices.

➔ People-related data *collection* is disaggregated consistent with the guidelines and data privacy compliance obligations.

➔ People-related data *analysis* is disaggregated consistent with the guidelines and data privacy compliance obligations.

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**.

➔ One or more data collection forms evidencing fields for voluntary submission of demographic information by stakeholders (e.g., direct workers, suppliers, customers, and end users, as applicable).

➔ One or more internal people-related dashboards reflect analyses informed by disaggregated data.

Relevance to Other Frameworks

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

Resources

How to Effectively — and Legally — Use Racial Data for DEI (Lily Zheng, Harvard Business Review, July 2023)

Recommendations from the Equitable Data Working Group (Equitable Data Working Group, White House Executive Order 13985 Equitable Data Working Group, 2023)

Companies Disclosing Their EEO-1 Reports Saw Higher 2022 Returns (Mona Patni, JUST Capital, March 2023)

Companies Disclosing the Gold Standard of Workforce Diversity Data – the EEO-1 Report or Similar Intersectional Data – More Than Tripled between 2021 and 2022 (Matthew Nestler, Aleksandra Radeva, and Ian Sanders, JUST Capital, 2022)

Counting a Diverse Nation: Disaggregating Data on Race and Ethnicity to Advance a Culture of Health (Victor Rubin, et al., PolicyLink, 2018)

Civil Rights Principles for the Era of Big Data (Civil Rights Privacy and Technology Table, 2020)

Health Equity: Everyone Counts (P Braveman, et al., Robert Wood Johnson Foundation, May 2022)

An Employer Guide To LGBTQ+ Inclusive Self-Id (Human Rights Campaign Foundation, accessed May 2024)

Collecting LGBT+ Data for Diversity: Initiating Self-ID at IBM (M. V. Lee Badgett, Center for Employment Equity, University of Massachusetts Amherst, accessed May 2024)

Encouraging Self-Identification (AskEARN, Employer Assistance and Resource Network, accessed May 2024)

PERFORMANCE TARGET 2.5

Human rights assessments integrating equity considerations are conducted regularly.

Requirement

Regularly conduct **human rights assessments** consistent with a formal **human rights** policy that integrates equity considerations within a **human rights due diligence** framework.

Metrics

Policy metric: One human rights policy consistent with the guidelines.

Practice metric: Documentation of human rights assessment findings consistent with the guidelines.

Share Progress & Achievement

Disclosure available to the public of the company's commitment to human rights and its policy adoption, either on the company's website or in an annual report (or other publicly available filing).

Annual disclosure to the Board of significant findings and concrete actions taken in relation to human rights due diligence and saliency assessments, including risk register.

Rationale, Tips, and Guidelines

RATIONALE:

Advancing equity and inclusion and combating discrimination go hand-in-hand with respecting and protecting human rights. Since the United Nations Human Rights Council unanimously endorsed the UN Guiding Principles on Business and Human Rights (UNGPs) in 2011, a growing number of businesses have embraced the UNGPs, including by adopting human rights policies and conducting human rights due diligence, including assessments. Such practices embody the fundamental responsibility of all businesses to respect the human rights of their stakeholders "regardless of their size, sector, operational context, ownership and structure."

This Target affirms the importance of such practices and aims to ensure that equity considerations are embodied within them. Ultimately, there should be no light between respecting human rights, advancing equity and inclusion, and combating discrimination—they are mutually reinforcing and essential components of socially responsible business.

IMPLEMENTATION TIPS:

1. For companies new to this practice, start by getting to know the UNGPs, learning from peers, and raising internal awareness about the benefits of adopting this Target before diving into formal implementation. See the Resources list for several great starting points.

2. For smaller companies, there are multiple resources to support getting started, including this Companion Note from the UN Office of the High Commissioner for Human Rights.

3. A common critique of human rights assessments and associated practices (such as supply chain audits) is that they can become "check-the-box" exercises that fail to identify **salient** issues. One example is identifying and addressing child labor in the supply chain. Accordingly, in implementing the company's policies and practices, take time to understand the common pitfalls.

4. Adopting Target 2.2 (on coordinated and aligned teams) will support success here, especially related to incorporating equity considerations into human rights policies and practices.

5. Conducting regular human rights assessments and a periodic civil rights audit (as called for in Target 2.6) may seem like more than is necessary, but each is important and serves a distinct purpose. For example, human rights assessments are often global in scope or focused on a specific product, service, or technology, whereas civil rights audits focus on the U.S.

GUIDELINES:

1. If the company does not already have a human rights policy, codify its commitment to respect human rights by adopting a formal written policy, including the following:

   a. An explicit commitment to respect human rights across all operations and business relationships;

   b. The manner in which the company will operationalize its commitment, including by adopting **human rights due diligence**.

   c. The business practices that are prohibited by the policy, including child labor and forced labor.

   d. The practices that the company will adopt to further operationalize its commitment, including transparency and governance practices.

2. The human rights policy should be formally approved by the most senior leader(s) with oversight of social

impact, value chain, or compliance matters, as reflected by their signature(s) on the policy. (The policy may be integrated with an existing policy and/or another policy required under these Standards.)

3. Consistent with the human rights policy and the company's broader framework of human rights due diligence, establish and document the cadence of the company's regular human rights assessments.

   a. Though this Target does not dictate a particular cadence—as the regularity and depth with which assessments should be conducted will depend on the company's context and the human rights risks identified—ensure the cadence is consistent with best practices in the company's industry.

4. In conducting regular human rights assessments, take the following concrete steps:

   a. If the company engages a third-party firm to conduct or support the assessment, ensure the following:

      i. The firm can articulate and tangibly demonstrate how it avoids the common pitfalls of such assessments (as noted in the implementation tips above).

      ii. The engagement is led and staffed by a seasoned and diverse team with demonstrated expertise in human rights and equity, including equitable stakeholder engagement.

   b. Incorporate equity considerations in the company's stakeholder engagement efforts, including the following:

      i. In general, follow best practices in equitable community engagement (see

Target 10.1).

      ii. Respect stakeholders' time and expertise by providing them ample time to review relevant materials and offering reasonable compensation or other consideration. Not all will need or accept consideration, but making such an offer demonstrates the company's recognition of the value it receives from stakeholder time and input.

      iii. Seek stakeholder input on the positive outcomes the company ought to strive for and ultimately achieve.

      iv. In the company's management of actual or potential human rights risks, focus on equitable outcomes alongside (not subordinate to) risk mitigation efforts.

      v. Ensure stakeholder engagement is not limited to, or predominantly reliant on, current or former philanthropic grantees.

   c. Incorporate and track relevant findings in a risk register (i.e., a formal method of tracking risks and the manner in which they are being mitigated), which the Board should have visibility into at least annually. (See Target 1.3 on Board oversight.)

5. If the company already conducts materiality assessments, it can integrate the human rights assessment within it as long as the expectations of a human rights saliency assessment are met (e.g., that impacts on all potentially relevant human rights are considered and that affected stakeholders are equitably engaged).

6. Enabling and providing effective remedy for stakeholders who experience human rights abuse is a

core component of this Target (see UNGP 15 and 22). In the event an assessment reveals that the company has caused or contributed to a negative impact on stakeholders, remedy means reckoning with and repairing harm—most simply, *making things right*. Doing so can take multiple forms, but at the very least should include establishing grievance mechanisms and clear processes for how the company will remedy any human rights abuses by restoring affected stakeholders to the situation they would have been in absent the human rights abuse, such as through compensation, restitution, or rehabilitation.

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 human rights policies and practices.

➜ Human rights policy adopted and initial human rights assessment conducted for one or more products, geographic markets, or business relationships.

➜ Enterprise-wide human rights saliency assessment completed and risk register created.

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 human rights assessment findings.

➜ Documentation of human rights saliency assessment and risk register (or similar method of tracking and managing risks).

Relevance to Other Frameworks

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

Resources

Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Frameworks (United National Human Rights, Office of the High Commissioner, United Nations, 2011)

Doing Business with Respect for Human Rights: A Guidance Tool for Companies (Global Perspectives Project, Global Compact Network Netherlands, Oxfam, and Shift, 2016)

Companion Note II to the Working Group's 2018 Report to the General Assembly (A/73/163) - Corporate Human Rights Due Diligence (Working Group on Business and Human Rights, (United National Human Rights Special Procedures, October 2018)

A Guide for Business: How to Develop a Human Rights Policy (Lucy Amis, Office of the United Nations High Commissioner for Human Rights, 2015)

Principle One of the UN Global Compact: Human Rights (UN Global Compact, Ten Principles of the UN Global Compact, accessed May 2024)

Principle Two of the UN Global Compact: Human Rights (UN Global Compact, Ten Principles of the UN Global Compact, accessed May 2024)

Blueprint for Corporate Sustainability Leadership (UN Global Compact, 2010)

Tackling Inequality: An Agenda for Business Action (The Business Commission to Tackle Inequality, World Business Council for Sustainable Development, May 2023)

Online Library: Human Rights, Labour and Social Sustainability (UN Global Compact, accessed May 2024)

Materiality and Salience (BSR FAQ, Business for Social Responsibility, November 2022)

Stakeholder Engagement (BSR FAQ, Business for Social Responsibility, April 2023)

Salient Human Rights Issues (UN Guiding Principles Reporting Framework, Shift and Mazars, September 2017)

Reckoning, Repair, and Change (Veronica Borgonovi, FSG, 2019)

CEO Guide to Human Rights (WBCSD Secretariat, et al., World Business Council for Sustainable Development, October 2020)

We Did a Human Rights Impact Assessment. Here's What We're Doing Next (Twitch, Twitch Interactive, April 2023)

Priority Recommendations of the Wells Fargo Human Rights Impact Assessment and Actions in Response (Wells Fargo, February 2022)

Human Rights in Supply Chains: A Call for a Binding Global Standard on Due Diligence (Human Rights Watch, May 2016)

PERFORMANCE TARGET 2.6

An independent third-party civil rights audit is undertaken on a regular basis.

Requirement

Undertake an independent third-party **civil rights** audit on a regular basis, informed by the company's context and the scope of any prior audits.

Metric

Civil rights audit report dated within a period consistent with the guidelines.

Share Progress & Achievement

Disclosure available to the public of the civil rights audit report, either on the company's website or in an annual report (or other publicly available filing).

(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:

A comprehensive civil rights audit considers the broad array of actual and potential civil rights impacts a company may have on a variety of stakeholders, and may include a review of the company's workforce, products, services, community impact, and more. The purpose of a civil rights audit is to (a) ensure compliance with civil rights laws and regulations; (b) advance equity and nondiscrimination in all aspects of a company's operations and practices; and (c) address concerns of **stakeholders**, where such concerns have been raised.

For companies interested in or just beginning to adopt the Standards, conducting a civil rights audit first can help inform what goals to set and where to deploy resources to make meaningful progress across all the Standards.

For companies that have already made progress across one or more standards, periodic civil rights audits remain a critical strategy to ensure all relevant issues are being addressed.

IMPLEMENTATION TIPS:

1. While a civil rights audit can be completed at any time, consider staging it before or after other periodic assessments (such as a human rights assessment, per Target 2.5), unless the company identifies efficiencies to be gained by conducting multiple assessments at the same time.

2. A civil rights audit is distinguishable from a legal investigation or risk assessment in that it is broader, encompassing not only whether the company is complying with civil rights laws but also whether the company is living up to its commitment to eliminate bias and discrimination in all aspects of the business.

3. Conducting human rights assessments (see Target 2.5) and a periodic civil rights audit may seem like

more than is necessary, but each is important and serves a distinct purpose. For example, civil rights audits focus on the U.S., whereas human rights assessments are often global in scope or focused on a specific product, service, or technology.

4. Ensuring key leaders and teams, such as human rights, civil rights, and sustainability leaders, are working together in close alignment (per Target 2.2) will help ensure these multiple work streams are coordinated and resources are used efficiently.

GUIDELINES:

1. To meet the requirements of this Target, follow the guidelines in the soon-to-be released civil rights audit standards (anticipated in June/July 2024). The civil rights audit standards will cover engaging a qualified independent auditor, carrying out the audit, and sharing the audit results with stakeholders. On the final launch of these Standards, the civil rights audit standards will be more fully integrated here.

2. Consistent with the forthcoming civil rights audit standards, establish and document the planned cadence of the company's civil rights audits, informed by the company's context and any prior audits.

   a. Though this Target does not dictate a particular cadence—as the regularity and depth with which audits should be conducted will depend on the company's context and the civil rights risks identified—ensure the cadence is consistent with best practices in the company's industry.

3. The outcome of the civil rights audit should include a formally approved and resourced plan to address any issues identified. The plan should take into account and integrate the company's existing progress and anticipated goals across the Standards.

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 civil rights audit practices, including the scope and outcome of any prior audits.

➔ Scope of initial (or next) civil rights audit determined and auditing team engaged.

➔ Audit completed and results shared with senior leadership and the Board.

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.

➔ Executed engagement letter with third-party auditor.

➔ Record of audit report shared with senior leadership and the Board.

Relevance to Other Frameworks

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

Resources

The Rationale for and Key Elements of a Business Civil Rights Audit (Laura W. Murphy, The Leadership conference on Civil and Human Rights and Ford Foundation, 2021)

What to Know About Civil Rights Audits: Q&A with Ronald Machen (KPMG, 2022)

What Every Multinational Company Should Know About . . . Navigating Economic Downturns through Racial Equity Audits (Byron J. McLain and Alexis M. Jackson, Foley & Lardner LLP, July 2023)

Racial Equity Audits: A New ESG Initiative (Ron S. Berenblat and Elizabeth R. Gonzalez-Sussman, Harvard Law School Forum on Corporate Governance, October 2021)

How Proactive Racial Equity Audits Can Increase Company Profits (Johnjerica Hodge and Ally Jordan, Bloomberg Law, November 2022)

Reckoning, Repair, and Change (Veronica Borgonovi, FSG, 2019)

The National Study of Workplace Equity (Samuel Bradley, Jr. and Marcie Pitt-Catsouphes, Boston College School of Social Work and SHRM, December 2022)

A Report to Citi On the Progress of Citi's Efforts to Address the Racial Equity Wealth Gap Through Its Action for Racial Equity (Covington, December 2022)

State Street Civil Rights Audit (Relman Colfax, 2023)

A Report to Wells Fargo & Company on its Efforts to Promote Racial Equity (Covington, December 2023)