

# Transparency Criteria: Form 10-Ks



Here is the set of 28 criteria that companies can use to make their Form 10-Ks more transparent:

1. The document is available in PDF print format (not only a PDF of the HTML).
2. There is an interactive version that includes links to navigate to and from sections of the document, including table of contents.
3. There is a table of contents on page 2 with two levels (chapters and subsections) of detail.
4. The document follows a logical structure recommended by the SEC.
5. Each section of the report is labeled with the appropriate name from the regulations (i.e., “Risk Factors,” “Management Discussion and Analysis,” etc.).
6. Every page footer or header includes the company name, document title and year and relevant section.
7. The document includes a secondary color.
8. Item 1 – Business contains an overview of the company’s strategy.



9. Item 1 – Business includes a graphic to highlight company strategy.
10. Within Item 1, there is a direct link to the website hosting all of the company’s SEC filings.
11. Within the human capital management section, there is a subsection on diversity and inclusion.
12. Within the human capital management section, there is a subsection on employee recruitment and retention.
13. The company discloses employee turnover metrics.
14. Within the human capital management section, there is a subsection on employee training and development.
15. Within the human capital management section, there is a subsection on employee health, wellness and safety.
16. Within the human capital management section, there is a subsection on culture and engagement.
17. The company discloses global workforce statistics on gender.
18. The company discloses workforce statistics on race.
19. The “Risk Factors” section is broken into subsections by the type of risk.
20. The company discusses cybersecurity in the context of risk.
21. The company discloses whether the Board or applicable Board Committee receives reports or summaries of any cybersecurity risk assessments conducted by a third party.



22. The company discusses environmental issues in the context of risk.
23. The company discloses whether the Board or applicable Board Committee receives reports or summaries of any climate scenario risk assessments conducted by a third party.
24. The segments in the Business Overview are an exact match to the segments discussed in the MD&A.
25. The MD&A contains at least one graphic to highlight company performance.
26. The tables throughout the MD&A have titles.
27. The Notes to Consolidated Financial Statements have a dedicated table of contents.
28. The document contains a Glossary of Terms or Key Word Index.

