

# Transparency Criteria: ESG Reports



Here is the set of 71 criteria that companies can use to make their ESG reports more transparent:

1. The company publishes an ESG report or provides a website that summarizes its ESG activities, in either case that is updated at least annually or bi-annually (for companies that publish multiple reports and/or provide website disclosure, the company must provide a summary or highlights document with direct, clearly-identified links to information across its other reports/website).
2. The company provides an interactive document with links to navigate to and from sections of the document, including table of contents.
3. Every page footer or header includes the company name, document title and year and relevant section.
4. The document includes a one-page table of contents that includes two levels of hierarchy.
5. The document has an “about this report” section that gives context for understanding narrative and numbers in the report including at a minimum: the report dates; boundaries (geographic or other); and voluntary ESG frameworks or standards used.



6. The company provides a contact for ESG-related information or questions.
7. The company states whether it has a Chief Sustainability Officer or similarly titled position and who that position reports to.
8. The document includes an introductory letter discussing how ESG is integrated into company strategy from either the CEO, the Board or Chief Sustainability Officer (or equivalent).
9. The mission, vision or purpose is disclosed somewhere within the introductory pages.
10. The company discusses how its overall ESG strategy aligns with the company's mission, vision or purpose.
11. The "about the company" section includes, at a minimum: an overview of products/services; areas of operations and number of employees.
12. The "about the company" section includes graphics or other visual elements.
13. An overview of ESG "materiality" includes how "material" ESG topics were determined and prioritized.
14. Stakeholder engagement is discussed, including stakeholder groups engaged, type of engagement and frequency.
15. Within the introductory pages of the report (or of each applicable section), the document includes a summary of its ESG commitments/ goals and progress to date.
16. Graphics or other visuals are used throughout the report to show performance against key quantitative goals (at least three goal-related graphics).



17. ESG strategy is presented as aligned with UN Sustainable Development Goals.
18. The document includes an overview of the company's overall strategy and policies related to the environmental issues identified in its report.
19. The document discusses the board's role in oversight of climate risks and opportunities.
20. The company explains how it identifies, prioritizes and manages climate risks and opportunities.
21. Climate risk scenario analysis results are presented or shared via a link to a separate report.
22. Scope 1 and 2 emissions data is reported year-over-year (unless inaugural report).
23. Scope 3 emissions data for reporting year are disclosed.
24. Greenhouse gas/carbon emissions reduction targets are quantitatively disclosed.
25. The company discloses that Greenhouse gas/carbon emission targets have been approved (or are in process of review) by the Science-Based Targets Initiative (SBTi).
26. The company shares how it will meet Scope 1 and Scope 2 goals and targets.
27. The company shares how it will meet Scope 3 goals and targets.
28. \*The company discusses its approach to biodiversity.
29. \*The company discusses its approach to circularity/waste (recycling/ reducing waste).



30. The company discusses expectations of suppliers to adhere to its environmental standards.
31. \*The company discusses its approach to water management.
32. The document includes an overview of the company's overall strategy and policies related to the social topics identified in its report.
33. Company culture and values are presented.
34. Global workforce statistics (full time, part time, and by region) are presented.
35. The company provides a link to its latest EEO-1 report.
36. There is a section or subsection on diversity, equity and inclusion.
37. DE&I goals are disclosed.
38. DE&I progress against goals are disclosed.
39. The company provides a summary of its actions around its DE&I goals and targets.
40. Graphics are included to represent gender at the board, senior leadership and associate levels.
41. Graphics are included to represent race/ethnicity at board, senior leadership and associate levels.
42. Pay audits and/or pay equity (how often, how gaps are fixed, etc.) are discussed.
43. Voluntary and involuntary turnover rates are disclosed.



44. There is a section or subsection on employee training and development.
45. \*There is a section or subsection on employee safety.
46. There is a section or subsection on employee wellness, well-being or mental health.
47. There is a section or subsection on employee engagement.
48. The document includes an overview of the company's strategy and commitment to human rights.
49. There is a link or summary of the company's human rights policy.
50. There is a link or summary of the company's supplier code of conduct.
51. Supply chain audit processes are disclosed.
52. The company discusses how it gives back to communities in which it does business and/or employees live (volunteering, philanthropy and foundations, employee giving, partnerships, etc.).
53. The dollar amount of charitable giving, by type, in the current reporting year is disclosed.
54. The document includes an overview of the company's overall approach to governance topics identified in its report.
55. The document discusses the board's oversight of the ESG topics discussed in the report, including board committee oversight.
56. A table, graphic or other visual elements are used to depict ESG board oversight.



57. The company explains how its enterprise risk management (ERM) process includes the assessment/evaluation of ESG topics.
58. The company discusses its ethics and compliance culture.
59. The company states whether it has a Chief Compliance Officer or similarly titled position and who that person reports to.
60. The document includes a summary of the topics covered in the code of ethics/code of conduct or list of related policies.
61. Open reporting process is discussed, including anonymous reporting programs and anti-retaliation policies.
62. Ethics/code of conduct training requirements are disclosed, including who is trained and how often.
63. The company provides an overview of its overall strategy and policies relating to cybersecurity.
64. The company states whether it has a Chief Information Security Officer or similarly titled position and who that person reports to.
65. Information security (cyber/data privacy) training is disclosed, including who is trained and how often.
66. \*Discussion of approach to product safety, including methods for reporting complaints.
67. Policies related to political activity or public policy engagement are disclosed.
68. The company provides a list of trade association memberships, engagement in national or international ESG processes, or other partnerships around material ESG issues, especially those related to industry sector (e.g., involvement in climate policy or SEC disclosure regulations).



69. The company provides a third-party assurance/verification letter(s) for, at a minimum, GHG emissions.
  70. The company provides a SASB index and TCFD index, or alternatively an ISSB (IFRS) Index.
  71. GHG methodology is explained, including at a minimum: what standards followed (such as GHG Protocol) to understand assumptions; financial, operational or other type of control used; entities/assets excluded and why; and any other assumptions needed to understand full context of GHG emissions shared in report.
- \* Denotes criteria applicable to certain industries (topics aligned with SASB industry standards, unless identified by the company as a low priority topic).

