

Survey questions list

GRI Sector Standard Project for Financial Services Exposure drafts public comment questionnaires



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1. Introduction

Thank you for taking part in the public consultation of the GRI Sector Standards project for Financial Services, which includes three Standards: banking, capital markets and insurance.

The Sector Standards for Financial Services are published for public comment by the <u>Global</u> <u>Sustainability Standards Board (GSSB)</u>, the independent standard-setting body of GRI, in line with the GSSB Due Process Protocol.

Any interested party can submit comments on the exposure drafts using this online questionnaire. You are welcome to provide feedback on any of the exposure drafts for banking, capital markets, and insurance, or on all of them.

Note: The exposure drafts are published for public consultation only, and their content may change before the final versions of the Standards are released for use.

Access the GRI Financial Services exposure drafts in the following links:

Banking Standard
Capital Markets Standard
Insurance Standard

A summary of the project's objectives and the significant proposals can be found in the <u>Explanatory</u> <u>Memorandum</u>.

Feedback can be submitted until 31st of May 2025.

Please provide all feedback via the survey in English. If using this survey or commenting in English is not feasible, please reach out to financialservices@globalreporting.org for support.

For further details, you can visit the project website or read our Frequently Asked Questions.

Instructions for providing feedback

- Please read through the exposure drafts in their entirety before submitting your responses.
- You are welcome to provide feedback on any of the exposure drafts for banking, capital markets, and insurance, or on all of them.
- Questions marked with an asterisk (*) must be answered before you can proceed.
- You can go back to the previous page to review or change your responses.
- When responding to the questions, please provide where possible:
 - the line number(s) of the text or reference number of the disclosure which your comment concerns;
 - o a rationale or supporting explanation for your comment;
 - o when relevant an alternative wording suggestion;
 - any relevant authoritative instruments or information where we can access further resources.
- It is not necessary to answer all the questions in the questionnaire; only those relevant to you.
- The final question in the survey gives you the opportunity to submit any additional comments or suggestions.
- Before submitting the questionnaire, you can choose to have a copy of your responses emailed to you.





For more information about the project, please visit the project webpage. If you have any questions about providing feedback via questionnaire or the public consultation period, please email financialservices@globalreporting.org

2. Respondent details

As required by the <u>GSSB Due Process Protocol</u>, all comments received in English will be reviewed and considered a matter of public record.

Comments will be published on the GRI website along with the name of the individual or the organization submitting the comment, country represented, and stakeholder constituency. These personal details will not be used or processed for any other purposes by GRI other than informing the development of the Sector Standards. For more information, read GRI's privacy policy.

Please confirm whether you agree to have your name (for individual submissions) or your organization's name (for organizational submissions), country, and stakeholder constituency published with your comments on the GRI website. If you do not agree, your comments will not expressly be considered by the GSSB *

- Agree
- · Do not agree

Please confirm whether you agree to GRI contacting you to clarify your responses and/or to follow up on comments submitted through this survey. *

- Agree
- · Do not agree

First name *

Last name *

Are you responding on behalf of an organization? *

- Yes
- No

Organization name *

Email address *

Country - Please indicate the country you/your organization represent *

Constituency* [Academic / Assurance provider / Business / Consultant / Government / Investor / Labor representative / Market regulator / Non-governmental organization / Rating agency / Standard setter / Stock exchange / Student / Trade or industry association / Other (please specify)]

Note that if this submission is on behalf of an organization, the name of the organization will be published, and not the name of the individual person making this submission.





3. Questions

Do you want to provide feedback to the Banking exposure draft? *

The Sector Standard for banking will apply to organizations undertaking any of the following:

- Consumer banking
- Commercial banking
- Corporate banking
- Investment banking
 - Yes
 - No

After completing this questionnaire, you will also have the option to answer the capital markets and/or insurance questionnaire.

Do you want to provide feedback to the Capital Markets exposure draft? *

The Sector Standard for capital markets will apply to organizations undertaking any of the following:

- Asset ownership
- Asset management
- Wealth management
- Custodian activities
- Investment advisory
 - Yes
 - No

After completing this questionnaire, you will also have the option to answer the insurance questionnaire.

Do you want to provide feedback to the Insurance exposure draft? *

The Sector Standard for insurance will apply to organizations undertaking any of the following:

- Life insurance
- Non-life insurance
- Reinsurance
- Insurance intermediation, for example, by agents and brokers
 - Yes
 - No





3.1 Survey Questions for the banking exposure draft

Scope of the exposure draft

We recommend having the Banking exposure draft open while responding the questionnaire.

Section 1, 'Sector this Standard applies to' (page 4), outlines the scope of the Standard.

The Sector Standard for banking will apply to organizations undertaking any of the following:

- consumer banking;
- commercial banking;
- corporate banking;
- investment banking.

This Standard can be used by any organization in the banking sector, regardless of size, type, geographic location, or reporting experience.

Q1. For this Standard, is the sector's scope clear and practical?

- Yes
- No

Are there any other activities or types of organizations that should fall within the scope of this Standard? Please suggest what could be improved.

Reporting on investment activities

Disclosures on impacts arising from investment activities are most relevant to the capital markets sector. However, recognizing that many organizations in the banking sector also undertake investment activities, related disclosures have been included in the banking exposure draft. This approach aims to streamline reporting by enabling organizations in the banking sector with investment activities to report on these through a single Sector Standard.

Q2. Do you agree with the inclusion of investment activities in the Banking Sector Standard?

- Yes
- No

If not, please explain.

Disclosures on incorporating sustainability in banking and investment (p. 15)

Through the provision of products, services, and investments, organizations in the banking sector can be involved with the impacts of their customers and investees and their respective value chains on the economy, environment, and people, including human rights. The exposure draft includes disclosures for banking organizations that focus on incorporating sustainability in banking and investment and assessing and managing impacts from institutional customers and investees (see pages 15-18,





Disclosures XX.0.1 - XX.0.10). These disclosures aim to provide meaningful information on how impacts are assessed and managed, including roles, responsibilities, and processes for incorporating sustainability in banking and investment. All organizations in the banking sector reporting in accordance with GRI Standards are expected to report these disclosures.

Q3.a. Is what this section covers clear?

- Yes
- No.

If not, please explain what could be revised and how.

Q3.b. Do you agree with the placement of this section before the likely material topics in the Standard?

- Yes
- No

If not, please explain what could be revised and how.

Q3.c. Is the information requested in Disclosures XX.0.1 – XX.0.10 meaningful in understanding how banking organizations incorporate sustainability and assess and manage impacts related to their customers and investees?

- Yes
- No

If not, please explain why and what could be improved.

Likely material topics

Section 2, 'Likely material topics' (pages 19-75), lists 22 likely material topics for the banking sector. 'Likely material topics' encompass the sector's most significant impacts and are therefore likely to be material for most banking organizations to report publicly.

'Impact' refers to the effect the sector or organizations operating in the sector have, or could have, on the economy, environment, and people. Impacts can be positive or negative. Organizations can be involved with negative impacts through their activities or as a result of their business relationships (see GRI 1: Foundation 2021 for more information about key concepts).

When determining its material topics, a reporting organization in the banking sector needs to review each topic described in the Standard and decide if it is material for it to report based on its specific circumstances.

Not all topics listed in the Standard may be material for all organizations in the banking sector. For organizations reporting in accordance with the GRI Standards, if any of the topics included in the Standard are deemed not material, the organization lists them in the GRI Content Index and provides a short explanation of why they are not material. Other topics not listed in the Standard may be relevant to an organization based on its impacts or context and should also be reported on.





Overview of likely material topics - Banking

| Likely material topics |
|---|
| 1. Climate change |
| 2. Biodiversity |
| 3. Water and effluents |
| 4. Waste |
| 5. Financial health and inclusion |
| 6. Customer privacy and data security |
| 7. Marketing and labeling |
| 8. Local communities and rights of Indigenous Peoples |
| 9. Conflict-affected and high-risk areas |
| 10. Non-discrimination and equal opportunity |
| 11. Forced or compulsory labor |
| 12. Child labor |
| 13. Freedom of association and collective bargaining |
| 14. Occupational health and safety |
| 15. Employment |
| 16. Remuneration and working time |
| 17. Significant changes for workers |
| 18. Economic impacts |
| 19. Prevention of corruption and financial crime |
| 20. Anti-competitive behavior |
| 21. Tax |
| 22. Public policy |

Q4. Do the topics included in the exposure draft represent the banking sector's most significant impacts and are therefore likely to be material for most organizations in the sector to report?

- Yes
- No

If not, please explain which topics should not be listed as likely material for the sector or which topics or significant impacts are missing.

Reporting sub-sections: For reporters

Section 2, 'Likely material topics' (pages 19-75), also lists relevant disclosures for the banking sector to report on each topic. These disclosures are partly derived from existing GRI Topic Standards. However, where disclosures from Topic Standards do not exist or do not provide sufficient information about a banking organization's impacts in relation to a topic, additional sector recommendations and disclosures are listed.

If any of the listed disclosures are irrelevant to the organization's impacts, the organization is not required to report them.

Please note that questions 5.a to 5.e are specifically for reporters.





Q5.a. Are the disclosures listed in this exposure draft (the recommendations and disclosures in the reporting sections) relevant for most banking organizations to report?

- Yes
- No

If not, which disclosure(s) are not relevant and why? (Please include the number of the disclosure in your response).

Q5.b. Are the included additional sector recommendations and disclosures understandable?

- Yes
- No

If not, please identify which recommendations or disclosures are difficult to understand and what could be improved and include the number of the disclosure in your response.

Q5.c. Can the additional sector recommendations and disclosures be reported?

- Yes
- No

If not, specify which ones and why, considering data availability, capacity, digital tools, regulations, or confidentiality (Please include the number of the disclosure in your response).

Q5.d. Is it clear whether the disclosures listed in this exposure draft (the recommendations and disclosures in the reporting sections) apply to a banking organization's activities, its business relationships, or both?

- Yes
- No

If not, please explain and include the number of the disclosure in your response.

Q5.e. Are there any significant impacts on the economy, environment, or people that are not reflected in the reporting of this exposure draft but are relevant for most organizations in the sector?

- Yes
- No

If so, please explain what should be included and why.

Reporting sub-sections: For information users

Section 2, 'Likely material topics' (pages 19-75), also lists relevant disclosures for the banking sector to report on each topic. These disclosures are partly derived from existing GRI Topic Standards. However, where disclosures from Topic Standards do not exist or do not provide sufficient information about a banking organization's impacts in relation to a topic, additional sector recommendations and disclosures are listed.





The additional sector reporting enables organization to provide sufficient and relevant information about its impacts in relation to each material topic so users can make informed assessments and decisions about it.

Please note that questions 6.a to 6.b are specifically for information users.

Q6.a. Are the disclosures listed in this exposure draft (the recommendations and disclosures in the reporting sections) critical and useful for information users to understand an organization's impacts related to each topic?

- Yes
- No

If not, please explain what could be improved (Please include the number of the disclosure in your response).

Q6.b. Are there impacts currently not (sufficiently) covered by the disclosures in this exposure draft that you would expect to see reported by banking organizations?

- Yes
- No

If so, please explain what should be included and why.

Topic-specific questions - Climate change (p. 19)

This topic covers how organizations contribute to climate change, including the transition to a low carbon economy, climate change mitigation and adaptation, and securing a just transition. Reporting on this topic covers a banking organization's approach to managing climate change-related impacts, including its contribution to real economy decarbonization, its approach to customers' and investees' transition plans and just transition principles, and its contribution to climate change adaptation and resilience.*

* The likely material topic Climate change lists relevant disclosures from the Climate Change Topic Standard exposure draft. These disclosures are subject to change based on the final revisions to this Topic Standard, which is expected to be released in Q2 2025.

Q7.a. Are the disclosures listed (the recommendations and disclosures in the reporting section) likely to generate critical information on banking organizations' approach to climate change?

- Yes
- No

Is there anything missing? Please explain what could be revised and how and include the number of the disclosure in your response.





Q7.b. Does the proposed reporting meet transparency expectations for the sector regarding climate change?

- Yes
- No

If not, are there any gaps or additional information that should be included?

Topic-specific questions – Biodiversity (p. 24)

This topic covers an organizations' impacts on biodiversity, including genetic diversity, animal and plant species, and natural ecosystems. Reporting on this topic covers policies for providing products and services to customers and investees that can or could have an impact on biodiversity, including through the use of genetic resources, the actions of banking organizations to assess their portfolios and identify customers and investees with the most significant impacts on biodiversity, and actions of banking organizations to halt and reverse biodiversity loss.

Q8.a. Are the disclosures listed (the recommendations and disclosures in the reporting section) likely to generate critical information on banking organizations' approach to biodiversity and how they manage related impacts?

- Yes
- No

Is there anything missing? Please explain what could be revised and how and include the number of the disclosure in your response.

Q8.b. Does the proposed reporting meet transparency expectations for the sector regarding biodiversity?

- Yes
- No

If not, are there any gaps or additional information that should be included?

Topic-specific questions – Financial health and inclusion (p. 32)

This topic covers an organization's approach to promoting financial health and inclusion. Reporting on this topic includes actions and processes aimed at improving access to and usage of banking products and services for identified targeted customer groups, as well as policies related to de-risking.

Q9.a. Is the content of this topic clear? Are there impacts missing from the topic description? If so, please explain what could be revised and how.

Q9.b. Are the disclosures listed (the recommendations and disclosures in the reporting section) likely to generate critical information on banking organizations' approach to financial health and inclusion, and how they manage related impacts?

- Yes
- No





Is there anything missing? Please explain what could be revised and how and include the number of the disclosure in your response.

Q9.c. Are the additional sector recommendations related to de-risking practices (XX.5.1) feasible for organizations to report?

- Yes
- No

Do they reflect transparency expectations for the banking sector regarding de-risking? Please explain what could be revised and how.

Topic-specific questions - Customer privacy and data security (page 36)

This topic covers an organization's impacts on customer privacy and the loss of customer data. Reporting focuses on the organization's approach to cybersecurity, customer data privacy, and data sharing with third parties, as well as how customers are informed about data usage in analytics. It also includes substantiated complaints related to privacy breaches and data losses.

Q10.a. Is the content of this topic clear? Are there impacts missing from the description? If so, please explain what could be revised and how.

Q10.b. Are the disclosures listed (the recommendations and disclosures in the reporting section) likely to generate critical information on banking organizations' approaches and impacts on customer privacy and data security?

- Yes
- No

Is there anything missing? Please explain what could be improved and include the number of the disclosure in your response.

Topic-specific questions – Local communities and rights of indigenous peoples (p. 41)

This topic covers socioeconomic and human rights impacts on local communities and the rights of Indigenous Peoples, including in relation to cultural heritage and community health. These impacts can stem from providing loans and investing in infrastructure projects and economic activities leading to, for example, environmental degradation, displacement, involuntary resettlement, or changes in land use. Reporting on this topic focuses on managing the impacts the organization is involved with through their customers and investees.

Q11.a Is the content of this topic clear? Are there impacts missing from the description? If so, please explain what could be revised and how.





Q11.b. Additional sector recommendation XX.8.1 suggests organizations describe their approach to managing impacts from customers and investees on local communities and rights of Indigenous Peoples, including quality assessments of customers and investees' stakeholder engagements, safeguarding human rights defenders, and direct engagement with affected stakeholders.

This additional sector recommendation is currently included for the topic of local communities and rights of Indigenous Peoples. Should it also be included for other human rights topics? If so, which topics?

Topic-specific questions – Conflict-affected and high-risk areas (p. 44)

This topic covers an organization's approach and impacts related to operating in or providing services to customers and investees in conflict-affected and high-risk areas. Reporting on this topic addresses due diligence expectations and adherence to international humanitarian law for customers and investees, portfolio exposure, and contextual information on how lending and investment portfolios are exposed to these areas, and the organization's approach to providing products and services to investees in the defense sector.

Q12.a. Is the content of this topic clear? Are there impacts missing from the description? If so, please explain what could be revised and how.

Q12.b. Are the disclosures listed (the recommendations and disclosures in the reporting section) likely to generate critical information on banking organizations' approach and impacts related to conflict-affected and high-risk areas, including due diligence expectations and adherence to international humanitarian law?

- Yes
- No

Is there anything missing? Please explain what could be improved and include the number of the disclosure in your response.

Topic-specific questions - Economic impacts (page 65)

This topic covers an organization's impacts on economic systems, including the economic well-being of their stakeholders through operations, the quality of products and services, and business relationships at local, national, and global levels. Reporting includes the direct economic value generated and distributed and financial assistance received from governments, including interventions during financial crises.

Q13.a. Is the scope of this topic clear? Are there impacts missing from the description? If so, please explain what could be revised and how.

Q13.b How do banking organizations affect economic systems through their products, services, and investments? Please explain your answer.





Q13.c. Are the disclosures listed (the recommendations and disclosures in the reporting section) likely to generate critical information on banking organizations' impacts on economic systems and how they manage related impacts?

- Yes
- No

Is there anything missing? Please explain what could be improved and include the number of the disclosure in your response.

Topic-specific questions – Prevention of corruption and financial crime (p. 67)

This topic covers the impacts of corruption and financial crime, focusing on how banking organizations can prevent related activities through their services and business relationships. Reporting on this topic covers procedures and operations assessed for risk of corruption and financial crime, training, communication of policies and procedures, and incidents of corruption and financial crime.

Q14.a. Is the content of this topic clear? Are there impacts missing from the description? If so, please explain what could be revised and how.

Q14.b. Are the disclosures listed (the recommendations and disclosures in the reporting section) likely to generate critical information on banking organizations' approaches and impacts on preventing corruption and financial crime?

- Yes
- No

Is there anything missing? Please explain what could be improved and include the number of the disclosure in your response.

Topic-specific questions – Public and customer health and safety (p. 71 of the insurance exposure draft)

Public and customer health and safety is a likely material topic in the exposure draft of the Insurance Sector Standard. This topic addresses how insurance organizations utilize their risk expertise beyond their core business to support public and customer health and safety, including through product and service design, incentives, awareness-raising on risks, and collaboration with stakeholders on disaster preparedness. In addition, the topic addresses how organizations in the insurance sector can be involved with impacts related to health and safety through their business relationships (e.g., insuring or investing in organizations that manufacture tobacco).

While this topic is tailored for the insurance sector, an adapted version for the banking sector could address their involvement with public health and safety impacts through both business relationships (e.g., lending to or investing in organizations involved with negative impacts on health and safety) and their activities (e.g., fire safety, security, disability, and safe access for customers in bank branches).





Q15. Do you consider an adapted version of this topic to be material for the banking sector?

- Yes
- No

If so, what specific impacts might banking organizations have regarding this topic?

Open questions

Q16. Are there any proposed disclosures for which data is currently not available, not possible to collect, or difficult to obtain over time? Please explain and include the number of the disclosure in your response).

Q17. Are there any other comments or feedback you would like to provide about the banking exposure draft?

This is the end of the Banking exposure draft questionnaire.

Would you like to provide feedback to the capital markets questionnaire?

The Sector Standard for capital markets will apply to organizations undertaking any of the following:

- Asset ownership
- Asset management
- Wealth management
- Custodian activities
- Investment advisory
 - Yes
 - No

After completing this questionnaire, you will also have the option to answer the insurance questionnaire.

Would you like to provide feedback to the insurance questionnaire?

The Sector Standard for insurance will apply to organizations undertaking any of the following:

- Life insurance
- Non-life insurance
- Reinsurance
- · Insurance intermediation, for example, by agents and brokers
 - Yes
 - No





3.2 Survey Questions for the capital markets exposure draft

Scope of the exposure draft

We recommend having the Capital Markets exposure draft open while responding the questionnaire.

Section 1, 'Sector this Standard applies to' (page 4), outlines the scope of the Standard.

The Sector Standard for capital markets will apply to organizations undertaking any of the following:

- asset ownership;
- asset management;
- wealth management;
- custodian activities;
- investment advisory

This Standard can be used by any organization in the capital markets sector, regardless of size, type, geographic location, or reporting experience.

Q1.a. For this Standard, is the sector's scope clear and practical?

- Yes
- No

Are there any other activities or types of organizations that should fall within the scope of this Standard? Please suggest what could be improved.

Q1.b Is your organization an asset owner?

- o No
- Yes Please consider and respond to the following:

Are there any impacts or expectations specific to asset owners' activities missing or not accurately described in the exposure draft? Please explain why and what could be improved.

Disclosures on incorporating sustainability in investment (page 15)

Through their investments, organizations in the capital markets sector can be involved with the impacts of their investees and their respective value chains on the economy, environment, and people, including human rights. The exposure draft includes disclosures for capital market organizations that focus on incorporating sustainability in investment and assessing and managing impacts from investees (see pages 15-18, Disclosures XX.0.1 to XX.0.11). These disclosures aim to provide meaningful information on how impacts are assessed and managed, including roles, responsibilities, and processes for incorporating sustainability in investment. All organizations in the capital markets sector reporting in accordance with GRI Standards are expected to report these disclosures.





Q2.a Is what this section covers clear?

- Yes
- No

If not, please explain what could be revised and how.

Q2.b Do you agree with the placement of this section before the likely material topics in the Standard?

- Yes
- No

If not, please explain what could be revised and how.

Q2.c Is the information requested in Disclosure XX.0.1 to Disclosure XX.0.11 meaningful in understanding how capital market organizations incorporate sustainability and assess and manage impacts related to their investees?

- Yes
- No

If not, please explain why and what could be improved.

Likely material topics

Section 2, 'Likely material topics' (pages 19-70), lists 22 likely material topics for the capital markets sector. 'Likely material topics' encompass the sector's most significant impacts and are therefore likely to be material for most capital market organizations to report publicly.

'Impact' refers to the effect the sector or organizations operating in the sector have, or could have, on the economy, environment, and people. Impacts can be positive or negative. Organizations can be involved with negative impacts through their activities or as a result of their business relationships (see <u>GRI 1: Foundation 2021</u> for more information about key concepts).

When determining its material topics, a reporting organization in the capital markets sector needs to review each topic described in the Standard and decide if it is material for it to report based on its specific circumstances.

Not all topics listed in the Standard may be material for all organizations in the capital markets sector. For organizations reporting in accordance with the GRI Standards, if any of the topics included in the Standard are deemed not material, the organization lists them in the GRI Content Index and provides a short explanation of why they are not material. Other topics not listed in the Standard may be relevant to an organization based on its impacts or context and should also be reported on.





Overview of likely material topics - Capital markets

| Likely material topics |
|---|
| 1. Climate change |
| 2. Biodiversity |
| 3. Water and effluents |
| 4. Waste |
| 5. Financial health and inclusion |
| 6. Customer privacy and data security |
| 7. Marketing and labeling |
| 8. Local communities and rights of Indigenous Peoples |
| 9. Conflict-affected and high-risk areas |
| 10. Non-discrimination and equal opportunity |
| 11. Forced or compulsory labor |
| 12. Child labor |
| 13. Freedom of association and collective bargaining |
| 14. Occupational health and safety |
| 15. Employment |
| 16. Remuneration and working time |
| 17. Significant changes for workers |
| 18. Economic impacts |
| 19. Prevention of corruption and financial crime |
| 20. Anti-competitive behavior |
| 21. Tax |
| 22. Public policy |

Q3. Do the topics included in the exposure draft represent the capital markets sector's most significant impacts and are therefore likely to be material for most organizations in the sector to report?

- Yes
- No

If not, please explain which topics should not be listed as likely material for the sector or which topics or significant impacts are missing.

Reporting sub-sections: For reporters

Section 2, 'Likely material topics' (pages 19-70), also lists relevant disclosures for the capital markets sector to report on each topic. These disclosures are partly derived from existing GRI Topic Standards. However, where disclosures from Topic Standards do not exist or do not provide sufficient information about a capital market organization's impacts in relation to a topic, additional sector recommendations and disclosures are listed.

If any of the listed disclosures are irrelevant to the organization's impacts, the organization is not required to report them.

Please note that questions 4.a to 4.e are specifically for reporters.





Q4.a. Are the disclosures listed in this exposure draft (the recommendations and disclosures in the reporting sections) relevant for most capital market organizations to report?

- Yes
- No

If not, which disclosure(s) are not relevant and why? (Please include the number of the disclosure in your response).

Q4.b. Are the included additional sector recommendations and disclosures understandable?

- Yes
- No

If not, please identify which recommendations or disclosures and what could be improved and include the number of the disclosure in your response.

Q4.c. Can the additional sector recommendations and disclosures be reported?

- Yes
- No

If not, specify which ones and why, considering data availability, capacity, digital tools, regulations, or confidentiality (Please include the number of the disclosure in your response).

Q4.d. Is it clear whether the disclosures listed in this exposure draft (the recommendations and disclosures in the reporting sections) apply to a capital market organization's activities, business relationships, or both?

- Yes
- No

If not, please explain and include the number of the disclosure in your response.

Q4.e. Are there any significant impacts on the economy, environment, or people that are not reflected in the reporting of this exposure draft but are relevant for most organizations in the sector?

- Yes
- No

If so, please explain what should be included and why.

Reporting sub-sections: For information users

Section 2, 'Likely material topics' (pages 19-70), also lists relevant disclosures for the capital markets sector to report on each topic. These disclosures are partly derived from existing GRI Topic Standards. However, where disclosures from Topic Standards do not exist or do not provide sufficient information about a capital market organization's impacts in relation to a topic, additional sector recommendations and disclosures are listed.





The additional sector reporting enables organization to provide sufficient and relevant information about its impacts in relation to each material topic so users can make informed assessments and decisions about it.

Please note that questions 5.a to 5.b are specifically for information users.

Q5.a. Are the disclosures listed in this exposure draft (the recommendations and disclosures in the reporting sections) critical and useful for information users to understand an organization's impacts related to each topic?

- Yes
- No

If not, please explain what could be improved (Please include the number of the disclosure in your response).

Q5.b. Are there impacts currently not (sufficiently) covered by the disclosures in this exposure draft, but you would expect to see reported by capital market organizations?

- Yes
- No

If so, please explain what should be included and the rationale for inclusion.

Topic-specific questions – Climate change (page 19)

This topic covers how organizations contribute to climate change, including the transition to a low-carbon economy, climate change mitigation and adaptation, and securing a just transition. Reporting on this topic covers a capital market organization's approach to managing climate change-related impacts, including its contribution to real economy decarbonization, its approach to investees' transition plans and just transition principles, and its contribution to climate change adaptation and resilience.*

*The likely material topic 'Climate change' lists relevant disclosures from the Climate Change Topic Standard exposure draft. These disclosures are subject to change based on the final revisions to this Topic Standard, which is expected to be released in Q1 2025.

Q6.a. Are the disclosures listed (the recommendations and disclosures in the reporting section) likely to generate critical information on capital market organizations' approach to climate change?

- Yes
- No

Is there anything missing? Please explain what could be revised and how and include the number of the disclosure in your response.

Q6.b. Does the proposed reporting meet transparency expectations for the sector regarding climate change?

- Yes
- No

If not, are there any gaps or additional information that should be included?





Topic-specific questions – Biodiversity (page 24)

This topic covers organizations' impacts on biodiversity, including genetic diversity, animal and plant species, and natural ecosystems. Reporting on this topic covers policies for providing products and services to investees that can or could have an impact on biodiversity, including through the use of genetic resources. It also covers actions of capital market organizations to assess their portfolios, identify investees with the most significant impacts on biodiversity, and actions to halt and reverse biodiversity loss.

Q7.a. Are the disclosures listed (the recommendations and disclosures in the reporting section) likely to generate critical information on capital market organizations' approach to biodiversity and how they manage related impacts?

- Yes
- No

Is there anything missing? Please explain what could be revised and how and include the number of the disclosure in your response.

Q7.b. Does the proposed reporting meet transparency expectations for the sector regarding biodiversity?

- Yes
- No

If not, are there any gaps or additional information that should be included?

Topic-specific questions – Financial health and inclusion (page 31)

This topic covers an organization's approach to promoting financial health and inclusion. Reporting on this topic includes actions and processes aimed at improving access to and usage of investment products and services for identified targeted client and investee groups, as well as the percentage of assets under management allocated to micro-, small-, and medium-sized enterprises (MSMEs).

Q8.a. Is the content of this topic clear? Are there impacts missing from the topic description? If so, please explain what could be revised and how.

Q8.b. Are the disclosures listed (the recommendations and disclosures in the reporting section) likely to generate critical information on capital market organizations' approach to financial health and inclusion, and how they manage related impacts?

- Yes
- No

Is there anything missing? Please explain what could be revised and how and include the number of the disclosure in your response.





Topic-specific questions – Local communities and rights of Indigenous Peoples (page 39)

This topic covers socioeconomic and human rights impacts on local communities and the rights of Indigenous Peoples, including in relation to cultural heritage and health. These impacts can stem from investing in infrastructure projects and economic activities leading to environmental degradation, displacement, involuntary resettlement, or changes in land use. Reporting on this topic focuses on managing impacts from investees.

Q9.a. Is the content of this topic clear? Are there impacts missing from the description? If so, please explain what could be revised and how.

Q9.b. Additional sector recommendation XX.8.1 suggests organizations describe their approach to managing impacts from investees on local communities and rights of Indigenous Peoples, including quality assessments of investees' stakeholder engagements, safeguarding human rights defenders, and direct engagement with affected stakeholders.

This additional sector recommendation is currently included for the topic of local communities and rights of Indigenous Peoples. Should it also be included for other human rights topics? If so, which topics?

Topic-specific questions – Conflict-affected and high-risk areas (page 41)

This topic covers an organization's approach and impacts related to operating in or providing services to investees in conflict-affected and high-risk areas. Reporting on this topic addresses due diligence expectations and adherence to international humanitarian law for investees, portfolio exposure, contextual information on how investment portfolios are exposed to these areas, and the organization's approach to providing products and services to investees in the defense sector.

Q10.a Is the content of this topic clear? Are there impacts missing from the description? If so, please explain what could be revised and how.

Q10.b. Are the disclosures listed (the recommendations and disclosures in the reporting section) likely to generate critical information on capital market organizations' approach and impacts related to conflict-affected and high-risk areas, including due diligence expectations and adherence to international humanitarian law?

- Yes
- No

Is there anything missing? Please explain what could be improved and include the number of the disclosure in your response.





Topic-specific questions – Economic impacts (page 61)

This topic covers an organization's impacts on economic systems, including the economic well-being of their stakeholders through operations, the quality of products and services, and business relationships at local, national, and global levels. Reporting includes the direct economic value generated and distributed and financial assistance received from governments, including interventions during financial crises.

Q11.a. Is the scope of this topic clear? Are there impacts missing from the description? If so, please explain what could be revised and how.

Q11.b. How do capital market organizations affect economic systems through their products, services, and investments? Please explain your answer.

Q11.c. Are the disclosures listed (the recommendations and disclosures in the reporting section) likely to generate critical information on capital market organizations' impacts on economic systems and how they manage the related impacts?

- Yes
- No

Is there anything missing? Please explain what could be improved and include the number of the disclosure in your response.

Topic-specific questions – Prevention of corruption and financial crime (page 63)

This topic covers the impacts of corruption and financial crime, focusing on how capital market organizations can prevent such activities through their services and business relationships. Reporting on this topic covers procedures and operations assessed for risk of corruption and financial crime, training, communication of policies and procedures, and incidents of corruption and financial crime.

Q12.a. Is the content of this topic clear? Are there impacts missing from the description? If so, please explain what could be revised and how.

Q12.b. Are the disclosures listed (the recommendations and disclosures in the reporting section) likely to generate critical information on capital market organizations' approaches and impacts on preventing corruption and financial crime?

- Yes
- No

Is there anything missing? Please explain what could be improved and include the number of the disclosure in your response.





Topic-specific questions - Public policy (page 69)

This topic covers an organization's approach to public policy advocacy and the impacts that can result from the influence an organization exerts. Reporting on the topic focuses on political contributions and resources allocated to public policy engagement.

Q13.a. Do you think the section 'Disclosures on incorporating sustainability in investment' on pages 15-18 should include additional disclosures on public policy beyond those covered in this likely material topic? Please explain.

Q13.b. If yes, should disclosures follow the structure of the disclosures on incorporating sustainability in investment, which highlights different organizational features (governance, roles and responsibilities, and actions taken)?

Topic-specific questions – Public and customer health and safety (page 70 of the <u>insurance exposure draft</u>)

Public and customer health and safety is a likely material topic in the exposure draft of the Insurance Sector Standard. This topic addresses how insurance organizations utilize their risk expertise beyond their core business to support public and customer health and safety, including through product and service design, incentives, awareness-raising on risks, and collaboration with stakeholders on disaster preparedness. In addition, the topic addresses how organizations in the insurance sector can be involved with impacts related to health and safety through their business relationships (e.g., insuring or investing in organizations that manufacture tobacco).

While this topic is tailored for the insurance sector, an adapted version for the capital markets sector could address their involvement with public health and safety impacts through business relationships, such as investing in organizations involved with negative impacts on health and safety.

Q14. Do you consider an adapted version of this topic to be material for the capital markets sector?

- Yes
- No

If so, what specific impacts might capital market organizations have regarding this topic?

Open questions

Q15. Are there any proposed disclosures for which data is currently not available, not possible to collect, or difficult to obtain over time? Please explain and include the number of the disclosure in your response.

Q16. Are there any other comments or feedback you would like to provide about the capital markets exposure draft?

This is the end of the Capital Markets exposure draft questionnaire.





Would you like to provide feedback to the insurance questionnaire?

The Sector Standard for insurance will apply to organizations undertaking any of the following:

- Life insurance
- Non-life insurance
- Reinsurance
- · Insurance intermediation, for example, by agents and brokers
 - Yes
 - No

3.3 Survey Questions for the Insurance exposure draft

Scope of the exposure draft

We recommend having the Insurance exposure draft open while responding the questionnaire.

Section 1, 'Sector this Standard applies to' (page 4), outlines the scope of the Standard.

The Sector Standard for insurance will apply to organizations undertaking any of the following:

- life insurance:
- non-life insurance;
- reinsurance;
- insurance intermediation, for example, by agents and brokers.

This Standard can be used by any organization in the insurance sector, regardless of size, type, geographic location, or reporting experience.

Q1.a. For this Standard, is the scope of the sector clear and practical?

- Yes
- No

Are there any other activities or types of organizations that should fall within the scope of this Standard? Please suggest what could be improved.

Q1.b. Is your organization engaged in reinsurance activities?

- o No
- Yes Please consider and respond to the following:

Are there any impacts or expectations specific to reinsurance missing or not accurately described in the exposure draft? Please explain why and what could be improved.

Q1.c. Is your organization engaged in insurance intermediation activities (e.g., agents, brokers)?

- o No
- Yes Please consider and respond to the following:





Are there any impacts or expectations specific to insurance intermediation missing or not accurately described in the exposure draft? Please explain why and what could be improved.

Reporting on investment activities

Disclosures on impacts arising from investment activities are most relevant to the capital markets sector. However, recognizing that many organizations in the banking sector also undertake investment activities, related disclosures have been included in the banking exposure draft. This approach aims to streamline reporting by enabling organizations in the banking sector with investment activities to report on these through a single Sector Standard.

Q.2 Do you agree with the inclusion of investment activities in the Insurance Sector Standard?

- Yes
- No

If not, please explain.

Disclosures on impacts from customers and investees (page 16)

Through the provision of products, services, and investments, organizations in the insurance sector can be involved with the impacts of their customers and investees and their respective value chains on the economy, environment, and people, including human rights. The exposure draft includes disclosures for insurance organizations that focus on assessing and managing impacts from institutional customers and investees (see pages 16-18, Disclosures XX.0.1 to XX.0.6). These disclosures aim to provide meaningful information on how organizations assess and manage these impacts in their insurance and investment portfolios. All organizations in the insurance sector reporting in accordance with the GRI Standards are expected to report these disclosures in accordance with the GRI Standards.

Q3.a. Is what this section covers clear?

- Yes
- No

If not, please explain what could be revised and how.

Q3.b. Do you agree with the placement of this section before the likely material topics in the Standard?

- Yes
- No

If not, please explain what could be revised and how.

Q3.c.Is the information requested in Disclosure XX.0.1 to XX.0.6 meaningful in understanding how insurance organizations assess and manage impacts related to their institutional customers and investees?

- Yes
- No





If not, please explain why and what could be improved (Please include the number of the disclosure in your response).

Likely material topics

Section 2, 'Likely material topics' (pages 19-74), lists 23 likely material topics for the insurance sector. 'Likely material topics' encompass the sector's most significant impacts and are therefore likely to be material for most insurance organizations to report publicly.

'Impact' refers to the effect the sector or organizations operating in the sector have, or could have, on the economy, environment, and people. Impacts can be positive or negative. Organizations can be involved with negative impacts through their activities or as a result of their business relationships (see GRI 1: Foundation 2021 for more information about key concepts).

When determining its material topics, a reporting organization in the insurance sector needs to review each topic described in the Standard and decide if it is material for it to report based on its specific circumstances.

Not all topics listed in the Standard may be material for all organizations in the insurance sector. For organizations reporting in accordance with the GRI Standards, if any of the topics included in the Standard are deemed not material, the organization lists them in the GRI Content Index and provides a short explanation of why they are not material. Other topics not listed in the Standard may be relevant to an organization based on its impacts or context and should also be reported on.

Overview of likely material topics - Insurance

| Likely material topics |
|---|
| 1. Climate change |
| 2. Biodiversity |
| 3. Water and effluents |
| 4. Waste |
| 5. Financial health and inclusion |
| 6. Customer privacy and data security |
| 7. Marketing and labeling |
| 8. Local communities and rights of Indigenous Peoples |
| 9. Non-discrimination and equal opportunity |
| 10. Forced or compulsory labor |
| 11. Child labor |
| 12. Freedom of association and collective bargaining |
| 13. Occupational health and safety |
| 14. Employment |
| 15. Remuneration and working time |
| 16. Significant changes for workers |
| 17. Economic impacts |
| 18. Prevention of corruption and financial crime |
| 19. Anti-competitive behavior |
| 20. Tax |
| 21. Public policy |
| 22. Public and customer health and safety |
| 23. Incorporating sustainability in investment |





Q4. Do the topics included in the exposure draft represent the insurance sector's most significant impacts and are therefore likely to be material for most organizations in the sector to report?

- Yes
- No

If not, please explain which topics should not be listed as likely material for the sector or which topics or significant impacts are missing.

Reporting sub-sections: For reporters

Section 2, 'Likely material topics' (pages 19-74), also lists relevant disclosures for the insurance sector to report on each topic. These disclosures are partly derived from existing GRI Topic Standards. However, where disclosures from Topic Standards do not exist or do not provide sufficient information about an insurance organization's impacts in relation to a topic, additional sector recommendations and disclosures are listed.

If any of the listed disclosures are irrelevant to the organization's impacts, the organization is not required to report them.

Please note that questions 5.a to 5.e are specifically for reporters.

Q5.a. Are the disclosures listed in this exposure draft (the recommendations and disclosures in the reporting sections) relevant for most insurance organizations to report?

- Yes
- No

If not, which disclosure(s) are not relevant and why? (Please include the number of the disclosure in your response).

Q5.b. Are the included additional sector recommendations and disclosures understandable?

- Yes
- No

If not, please identify which recommendations or disclosures and what could be improved and include the number of the disclosure in your response.

Q5.c. Can the additional sector recommendations and disclosures be reported?

- Yes
- No

If not, specify which ones and why, considering data availability, capacity, digital tools, regulations, or confidentiality (Please include the number of the disclosure in your response).





Q5.d. Is it clear whether the disclosures listed in this exposure draft (the recommendations and disclosures in the reporting sections) apply to an insurance organization's activities, business relationships, or both?

- Yes
- No

If not, please explain and include the number of the disclosure in your response.

Q5.e. Are there any significant impacts on the economy, environment, or people that are not reflected in the reporting in this exposure draft but are relevant for most organizations in the sector?

- Yes
- No

If so, please explain what should be included and why.

Reporting sub-sections: For information users

Section 2, 'Likely material topics' (pages 19-74), also lists relevant disclosures for the insurance sector to report on each topic. These disclosures are partly derived from existing GRI Topic Standards. However, where disclosures from Topic Standards do not exist or do not provide sufficient information about an insurance organization's impacts in relation to a topic, additional sector recommendations and disclosures are listed.

The additional sector reporting enables organization to provide sufficient and relevant information about its impacts in relation to each material topic so users can make informed assessments and decisions about it.

Please note that questions 6.a to 6.b are specifically for information users.

Q6.a. Are the listed disclosures in this exposure draft (the recommendations and disclosures in the reporting sections) critical and useful for information users to understand an organization's impacts related to each topic?

- Yes
- No

If not, please explain what could be improved (Please include the number of the disclosure in your response).

Q6.b. Are there impacts currently not (sufficiently) covered by the disclosures in this exposure draft, but you would expect to see reported by insurance organizations?

- Yes
- No

If so, please explain what should be included and the rationale for inclusion.





Topic-specific questions - Climate change (page 19)

This topic covers how organizations contribute to climate change, including the transition to a low-carbon economy, climate change mitigation and adaptation, and securing a just transition. Reporting on this topic covers an insurance organization's approach to managing climate change-related impacts, including its contribution to real economy decarbonization, its approach to customers' and investees' transition plans and just transition principles, and its contribution to climate change adaptation and resilience.*

* The likely material topic 'Climate change' lists relevant disclosures from the Climate Change Topic Standard exposure draft. These disclosures are subject to change based on the final revisions to this Topic Standard, which is expected to be released in Q1 2025.

Q7.a. Are the disclosures listed (the recommendations and disclosures in the reporting section) likely to generate critical information on insurance organizations' approach to climate change?

- Yes
- No

Is there anything missing? Please explain what could be revised and how and include the number of the disclosure in your response.

Q7.b. Does the proposed reporting meet transparency expectations for the sector regarding climate change?

- Yes
- No

If not, are there any gaps or additional information that should be included?

Topic-specific questions - Biodiversity (page 25)

This topic covers organizations' impacts on biodiversity, including genetic diversity, animal and plant species, and natural ecosystems. Reporting on this topic covers policies for providing products and services to customers and investees that can or could have an impact on biodiversity, including through the use of genetic resources. It also covers actions of insurance organizations to assess their portfolios, identify customers and investees with the most significant impacts on biodiversity, and actions to halt and reverse biodiversity loss.

Q8.a. Are the disclosures listed (the recommendations and disclosures in the reporting section) likely to generate critical information on insurance organizations' approach to biodiversity and how they manage related impacts?

- Yes
- No

Is there anything missing? Please explain what could be revised and how and include the number of the disclosure in your response.





Q8.b. Does the proposed reporting meet transparency expectations for the sector regarding biodiversity?

- Yes
- No

If not, are there any gaps or additional information that should be included?

Topic-specific questions – Financial health and inclusion (page 33)

This topic covers an organization's approach to promoting financial health and inclusion. Reporting on this topic includes actions and processes aimed at improving access to and usage of insurance products and services for identified targeted customer groups, as well as practices related to claims handling.

Q9.a. Is the content of this topic clear? Are there impacts missing from the topic description? If so, please explain what could be revised and how.

Q9.b. Are the disclosures listed (the recommendations and disclosures in the reporting section) likely to generate critical information on insurance organizations' approach to financial health and inclusion, and how they manage related impacts?

- Yes
- No

Is there anything missing? Please explain what could be revised and how and include the number of the disclosure in your response.

Topic-specific questions – Local communities and rights of Indigenous Peoples (page 41)

This topic covers socioeconomic and human rights impacts on local communities and the rights of Indigenous Peoples, including in relation to cultural heritage and health. These impacts can stem from insuring and investing in infrastructure projects and economic activities leading to environmental degradation, displacement, involuntary resettlement, or changes in land use. Reporting on this topic focuses on managing impacts from customers and investees.

Q10.a. Is the content of this topic clear? Are there impacts missing from the description? If so, please explain what could be revised and how.

Q10.b. Additional sector recommendation XX.8.1 suggests organizations describe their approach to managing impacts from customers and investees on local communities and rights of Indigenous Peoples, including quality assessments of customers and investees' stakeholder engagements, safeguarding human rights defenders, and direct engagement with affected stakeholders.

This additional sector recommendation is currently included for the topic of local communities and rights of Indigenous Peoples. Should it also be included for other human rights topics? If so, which topics?





Topic-specific questions – Economic impacts (page 60)

This topic covers an organization's impacts on economic systems, including the economic well-being of their stakeholders through operations, the quality of products and services, and business relationships at local, national, and global levels. Reporting includes the direct economic value generated and distributed and financial assistance received from governments, including interventions during financial crises.

Q11.a. Is the scope of this topic clear? Are there impacts missing from the description? If so, please explain what could be revised and how.

Q11.b. How do insurance organizations affect economic systems through their products, services, and investments? Please explain your answer.

Q11.c. Are the disclosures listed (the recommendations and disclosures in the reporting section) likely to generate critical information on insurance organizations' impacts on economic systems and how they manage related impacts?

- Yes
- No

Is there anything missing? Please explain what could be improved and include the number of the disclosure in your response.

Topic-specific questions – Prevention of corruption and financial crime (page 62)

This topic covers the impacts of corruption and financial crime, focusing on how insurance organizations can prevent related activities through their services and business relationships. Reporting on this topic covers procedures and operations assessed for risk of corruption and financial crime, training, communication of policies and procedures, and incidents of corruption and financial crime.

Q12.a. Is the content of this topic clear? Are there impacts missing from the description? If so, please explain what could be revised and how.

Q12.b. Are the disclosures listed (the recommendations and disclosures in the reporting section) likely to generate critical information on insurance organizations' approaches and impacts on preventing corruption and financial crime?

- Yes
- No

Is there anything missing? Please explain what could be improved and include the number of the disclosure in your response.





Topic-specific questions - Public and customer health and safety (page 70)

This topic covers impacts related to public and customer health and safety. The reporting for this topic focuses on how insurance organizations utilize their risk expertise beyond their core business to support public and customer health and safety, including through product and service design, incentives, awareness-raising on risks, and collaboration with stakeholders on disaster preparedness.

Q13.a. Is the scope of this topic clear? Are there impacts missing from the topic description? If so, please explain what could be revised and how.

Q13.b. Are the disclosures listed (the recommendations in the reporting section) likely to generate critical information on insurance organizations' approach to public and customer health and safety and how they manage related impacts?

- Yes
- No

Is there anything missing? Please explain what could be revised and how and include the number of the disclosure in your response.

Topic-specific questions - Incorporating sustainability in investment (page 72)

This topic explores how organizations in the insurance sector define and manage sustainability impacts through asset allocation and stewardship. Reporting on this topic focuses on how organizations assess and manage these impacts from investments, including roles, responsibilities, and processes for incorporating sustainability in investment.

Q14.a. Is the content of this topic clear? Are there impacts missing from the description? If so, please explain what could be revised and how.

Q14.b. Are the disclosures listed (the recommendations and disclosures in the reporting section) likely to generate critical information on insurance organizations' approach and impacts related to incorporating sustainability in investment?

- Yes
- No

Is there anything missing? Please explain what could be improved and include the number of the disclosure in your response.





Topic-specific questions - Conflict-affected and high-risk areas (page 44 of the <u>banking exposure draft</u> and page 41 of the <u>capital</u> markets exposure draft)

Conflict-affected and high-risk areas is a likely material topic in the banking and capital markets exposure drafts but not in the insurance exposure draft.

In the banking and capital markets exposure drafts, this topic covers an organization's approach and impacts related to operating in or providing services to customers and investees in conflict-affected and high-risk areas. Reporting on this topic addresses due diligence expectations and adherence to international humanitarian law for customers and investees, portfolio exposure and contextual information on how lending and investment portfolios are exposed to these areas, and the organization's approach to providing products and services to investees in the defense sector.

This topic was not deemed material for the insurance sector. Although the topic can be material for the investment activities of insurance organizations, it is less relevant for insurance activities. Insurance does not directly finance activities that could exacerbate conflict-related impacts but assesses and manages the risks to be supported or excluded.

Q15.a. Do you agree with the exclusion of this topic from the Insurance Sector Standard?

- Yes
- No

Q15.b. If you believe this topic should be included, please describe the impacts that insurance organizations might have on this topic.

Open questions

Q16. Are there any proposed disclosures for which data is currently not available, not possible to collect, or difficult to obtain over time? Please explain and include the number of the disclosure in your response.

Q17. Are there any other comments or feedback you would like to provide about the insurance exposure draft?

4. Thank you

Thank you for taking part in this survey.

We appreciate your time and greatly value your input. Check the box below to receive a copy of your answers. They will be sent to the email address you specify below. If you do not receive one, please check your spam folder.

By sending out this survey, you agree to the GRI Privacy Policy.

- Yes
- Send me a copy of my responses via email Enter your email address:

