

GRI Topic Standard Project for Labor - Forced Labor exposure draft

Comments to be received by 09 March 2026

This exposure draft of the GRI Labor Topic Standards is published for public comment by the Global Sustainability Standards Board (GSSB), the independent standard-setting body of GRI.

This exposure draft is intended to replace GRI 409: Forced or Compulsory Labor 2016.

Any interested party can submit comments on this draft by 09 March 2026 via this online survey.

As required by the <u>GSSB Due Process Protocol</u>, only comments submitted in writing and in English will be considered. Comments will be published on the GRI website and considered a matter of public record. Instructions on how to submit comments are outlined on the first page of the online questionnaire.

An explanatory memorandum preceding the exposure draft summarizes the objectives of the project and the significant proposals contained within this exposure draft.

This draft is published for comment only and may change before official publication.

EXPOSUII

For more information, please visit the <u>GRI Standards webpage</u>. For questions regarding the exposure draft or the public comment period, please send an email to labor@globalreporting.org

This document has been prepared by the GRI Standards Team and is made available to observers at meetings of the Global Sustainability Standards Board (GSSB). It does not represent an official position of the GSSB. Board positions are set out in the GRI Sustainability Reporting Standards. The GSSB is the independent standard setting body of GRI. For more information visit www.globalreporting.org.

Explanatory memorandum

- 2 This explanatory memorandum sets out the objectives for one of the exposure drafts of phase three of
- 3 the Labor project, including the review of the GRI 409: Forced or Compulsory Labor 2016, the
- 4 significant proposals contained in the exposure draft, and a summary of the GSSB's involvement and
- 5 views on the development of the draft.

6 Objectives for the project

- 7 The objective of the <u>labor project</u> is to review and revise all GRI labor-related Standards and
- 8 incorporate new issues to reflect stakeholder expectations for reporting labor-related impacts. In line
- 9 with the GSSB Due Process Protocol, a multi-stakeholder technical committee was established in
- 10 September 2022 to contribute to the review and content development.
- 11 Due to the focus on labor topics, a technical committee (TC) was formed with representation from
- workers, employers, and the International Labour Organization (ILO). Next to this tripartite technical
- committee, an advisory group (AG) was established with a broad stakeholder representation to advise
- 14 and assist the technical committee during the process.
- 15 The aim is to align with internationally agreed best practices, the latest developments, and relevant
- authoritative intergovernmental instruments related to human rights and labor conditions such as
- 17 International Labor Organization (ILO) Conventions and Recommendations; the United Nations (UN)
- 18 Guiding Principles on Business and Human Rights (Guiding Principles, UNGPs) and the Organization
- 19 for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.
- 20 The project reviews the current contents of existing GRI labor-related disclosures, and it also includes
- 21 new labor issues to reflect the stakeholders' expectations related to reporting impacts to provide
- 22 decent work that contributes to sustainable development, poverty alleviation, and dignity to workers.
- 23 The revised labor disclosures will facilitate the organization to disclose its impacts regarding:
 - How the organization manages labor impacts with employees, workers who are not employees and whose work is controlled by the organization, and workers in business relationships – enhances accountability and trust with workers and other stakeholders.
 - The implementation of international labor standards, including fundamental labor rights, by
 offering decent work and dignified working conditions, as well as the involvement of workers'
 representatives in developing and implementing policies.
 - Its approach to human rights is to provide decent work in terms of decent remuneration and working time, employment conditions, skills, career development, and work-life balance, improving workers' satisfaction and talent retention.

The labor project is divided into three sets of thematic Standards to allow targeted messaging and stakeholder engagement during the public comment periods. This ensures the workload is manageable for stakeholders and GRI reporters worldwide reviewing the draft Standards during the public comment periods.



24

25

26 27

28

29

30

31

32

33

34

37 Phase 1 – Employment practices and conditions

- 38 This set of Standards asks how the organization manages its employment conditions and
- 39 relationships. This includes working time, remuneration, employment practices such as recruitment,
- 40 performance management and termination, data, and worker privacy, as well as how the organization
- 41 responds to changes that substantially affect workers.
- 42 Set 1 comprises three Topic Standards and one Standard interpretation as follows:
- Employment

45

55

56

66

71

72

- Remuneration and Working Time
 - Significant Changes for Workers
- Control of work Standard interpretation to GRI 2
- 47 This first phase of exposure drafts was made available for discussion and approval at the May 2024
- 48 meeting of the GSSB. The public comment period was from 10 June to 4 October 2024,

49 Phase 2 – Working life and career development

- 50 This set of Standards focuses on the equal treatment and the development of an organization's
- 51 workers. It requests information on how the organization responds to the training and education
- 52 programs and their effectiveness, family-related policies at the workplace, and measures to provide
- work-life balance and an inclusive and diverse environment.
- 54 Set 2 includes the following Topic Standards:
 - Training and Education
 - Working Parents and Caregivers
- 57 This second set of labor exposure drafts was made available for discussion and approval at the
- February 2025 meeting. The public comment period was from 25 February to 29 April 2025.

59 Phase 3 – Workers' rights and protection

- This set of Standards focuses on four of the ILO's Fundamental Principles and Rights at Work. In
- 61 addition, it has a specific Standard to target the labor rights and working conditions for workers in
- business relationships with a due diligence approach.
- 63 Set 3 is divided into two and includes the following Topic Standards:

64 Subset 3-1 focused on Inclusion and equal opportunities at work

- Diversity and Inclusion
 - Non-discrimination and Equal Opportunity
- This subset 3-1 of labor exposure drafts was made available for discussion and approval at the June
- 68 2025 meeting. The public comment period was from 01 July to 15 September 2025.

69 Subset 3-2 focused on Rights and protections at work

- 70 Child Labor
 - Forced Labor
 - Freedom of Association and Collective Bargaining
- Labor Rights in Business Relationships
- 74 This subset 3-2 of the labor exposure drafts will be sent for discussion and approval by the GSSB on
- 75 19 November 2025. The public comment period is planned for early December 2025 until early March
- 76 2026.
- 77 For more information on the project, consult the <u>Project Proposal</u>, the <u>technical committee</u>, and
- 78 <u>advisory group</u> biographies.



Summary of the proposals

- 80 The scope of the workers in this exposure draft is the organization's employees and workers who are
- 81 not employees and whose work is controlled by the organization (hereafter, workers who are not
- 82 employees), and workers in business relationships. Workers who are not employees perform work for
- the reporting organization, but are not in a direct employment relationship. However, the reporting
- organization has control over their work. For example, agency workers, apprentices, and contractors.
- Workers in business relationships work for entities other than the reporting organization, such as
- suppliers, sub-contractors or other entities in its value chain including those beyond the first tier, who
- 87 perform work for the organization. The reporting organization does not control their work.
- 88 The exposure draft includes new disclosures and the review of GRI 409: Forced or Compulsory Labor
- 89 <u>2016</u>, in line with the project objectives set out above. Notable changes and inclusions in this
- 90 exposure draft are summarized below.

- 91 Forced labor policies and assessment for the organization's activities: Under this new
- 92 management disclosure, organizations are required to report their forced labor policies for employees
- 93 and workers who are not employees and report their alignment with authoritative intergovernmental
- 94 instruments (GRI FL 1-a). In addition, they must describe the processes used to prevent and address
- 95 forced labor, such as recruitment and labor practices to protect employees and workers who are not
- 96 employees, and monitoring of third parties involved with recruitment or supply of workers (GRI FL 1-
- 97 b). Organizations shall also describe their assessment processes for identifying activities at a higher
- 98 risk of forced labor, including the criteria used and the input from stakeholders (GRI FL 1-c). The
- 99 disclosure further asks for a description of worker representative involvement in developing.
- implementing, and evaluating forced labor policies (GRI FL 1-e).
- 101 Forced labor policies and assessment for business relationships: Under this new management
- disclosure, organizations are expected to describe their forced labor policies for business
- relationships and report their alignment with authoritative intergovernmental instruments. In addition,
- organizations shall report whether they have written agreements with business relationships related to
- forced labor (See GRI FL 2-a and 2-b). Organizations shall describe their assessment processes to
- identify business relationships at a higher risk of forced labor incidents, including the criteria and the
- 107 views of stakeholders or their representatives (GRI FL 1-c). Organizations must report on their
- approach to engaging with their business relationships to prevent forced labor, including incentives
- 109 offered (See GRI FL 1-d).
- 110 Access to effective grievance mechanisms: Organizations are expected to report how employees,
- 111 workers who are not employees, and workers in business relationships can access effective
- 112 grievance mechanisms when forced labor incidents occur (See GRI FL 1-e and GRI FL 2-e).
- 113 Organizations' activities at a higher risk of forced labor: this disclosure builds on Disclosure 409-
- 114 1 and requests organizations to report the types of activities at higher risk of forced labor by region
- and to describe actions taken to address the higher risk of forced labor (See GRI FL 3).
- 116 Business relationships at a higher risk of forced labor: this disclosure also builds on Disclosure
- 117 409-1, and organizations are expected to report the number of business relationships identified as
- having a higher risk of forced labor, the types of business relationships, and the action taken to
- address forced labor risks (See GRI FL 4).
- 120 New topic disclosure on forced labor incidents and actions taken : Organizations are expected
- to report the total number of forced labor incidents and a breakdown of the total number by region. In
- addition, for each region, the type of forced labor incidents and the number of employees and workers
- who are not employees affected must be provided. Organizations must describe the actions taken to



- address each incident type, including remediation and prevention measures, as well as actions to address the root causes of incidents.
- 126 New topic disclosure on forced labor incidents and actions taken in business relationships:
- Organizations are expected to report the number of incidents and a breakdown of the total number by
- 128 region. In addition, the type of forced labor incidents found in business relationships and the number
- 129 of workers affected by region. Organizations must describe the actions taken to address each incident
- 130 type, including remediation and prevention measures, as well as actions to address the root causes of
- incidents. Finally, organizations shall report the number of business relationships terminated due to
- 132 forced labor incidents (See GRI FL 6).
- 133 More extensive guidance throughout the draft: The exposure draft provides organizations with
- 134 example templates for presenting information in the tables of Disclosures FL 3 to FL 6 and examples
- to facilitate implementation of the disclosures.

136 GSSB involvement and views on the development of 137 this draft

- 138 The GSSB appointed one of its members as a GSSB sponsor and technical committee member for
- this project. The member left the GSSB at the end of last year and continued as a technical
- 140 committee member, actively participating in the technical committee process and attending all
- meetings. Another technical committee member became a GSSB board member during the standards
- development process, ensuring GSSB's close involvement.
- 143 The GSSB has been regularly updated on the progress of the labor project.
- The exposure draft was approved by the GSSB on 19 November 2025.
- 145 All GSSB meetings are recorded and made available on the GSSB GRI YouTube channel.

Note on reading this document

- 147 This document includes generic text used in all GRI Standards. This text is highlighted in grey and
- cannot be changed please do not comment on this text.
- 149 Underlined terms in the draft Standard indicate terms for which definitions have been provided. Most
- of these terms are already defined in the GRI Standards Glossary these are highlighted in grey and
- 151 cannot be changed. The proposed new definitions are not highlighted in grey and are open for
- 152 review.



153 GRI CL: Forced Labor 202X

Content

155	Introduction	7
156	1. Topic management disclosures	11
157	Disclosure FL 1 Policies and assessment for the organization's activities	11
158	Disclosure FL 2 Policies and assessment for business relationships	15
159	2. Topic disclosures	18
160	Disclosure FL 3 High-risk activities	18
161	Disclosure FL 4 High-risk business relationships	19
162	Disclosure FL 5 Incidents in the organization's activities	20
163	Disclosure FL 6 Incidents in business relationships	23
164	Glossary	26
165	Bibliography	31
	EXPOSUITE OR OF THE OR OF	



Introduction

166

170

171

172173

174

175 176

177

178

181

- 167 *GRI FL: Forced Labor 202X* contains disclosures for organizations to report information about their impacts related to forced labor, and how they manage these impacts.
- The Standard is structured as follows:
 - Section 1 contains two disclosures, which provide information about how the organization manages its impacts related to forced labor.
 - Section 2 contains four disclosures, which provide information about the organization's impacts related to forced labor.
 - The Glossary contains defined terms with a specific meaning when used in the GRI Standards. The terms are underlined in the text of the GRI Standards and linked to the definitions.
 - The Bibliography lists authoritative intergovernmental instruments and additional references used in developing this Standard.
- The rest of the Introduction section provides a background on the topic, an overview of the system of GRI Standards and further information on using this Standard.

Background on the topic

- 182 This Standard addresses the topic of forced labor.
- Forced labor, as defined by the International Labour Organization (ILO) Forced Labour
- 184 Convention (No. 29) [3], refers to all work or service which is exacted from any person under the
- menace of a penalty and for which the person has not offered themselves voluntarily.
- 186 'Work or service' refers to all forms of work, service, or employment occurring across all activities,
- 187 industries, and sectors. It covers both formal and informal work, whether legal or illegal. The concept
- of menace includes the threat of penalty; it may involve direct or indirect coercion, such as dismissal,
- retaliation, or wage withholding, and is directed at the victim, their family, or co-workers. 'Offered
- 190 voluntarily' refers to the free and informed consent of a worker to take a work and their freedom to
- 191 leave at any time, with reasonable notice in accordance with national laws or collective agreements.
- 192 Forced labor can include debt bondage, where workers are forced to work for little or no pay to repay
- a loan or are forced into debt in order to access work; prison labor without free and informed consent
- and when the conditions of work do not approximate those of free labor relationships; human
- 195 trafficking for exploitation, often across borders; and exploitative labor contracts, for example, that
- bind migrant workers through excessive fees and lack of freedom to change employers.
- 197 Forced labor falls within the scope of modern slavery. Modern slavery is an umbrella term used to
- describe situations of exploitation in which a person cannot refuse or leave due to threats, violence,
- 199 coercion, deception, and/or abuse of power. The term encompasses a range of practices, including
- forced labor, debt bondage, human trafficking, forced marriage, and serfdom. The concept of modern
- 201 slavery is employed to emphasize the shared elements across these exploitative practices and to
- 202 promote coordinated actions by governments, organizations, and other stakeholders to prevent,
- address, and ultimately eliminate them [13].
- The elimination of all forms of forced or compulsory labor is a fundamental principle of the
- 205 International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- 206 [2]. Organizations are expected to protect any person, of any age, gender, or nationality, from forced
- 207 labor.
- 208 According to the UN Guiding Principles on Business and Human Rights [11] and the ILO Tripartite
- 209 Declaration of Principles concerning Multinational Enterprises and Social Policy [8], organizations are
- 210 expected to take immediate and effective measures within their own competence to secure the
- 211 prohibition and elimination of forced or compulsory labor.



- 212 This Standard covers the organization's employees, workers who are not employees and whose work
- 213 is controlled by the organization, hereafter 'workers who are not employees', and workers in <u>business</u>
- 214 <u>relationships</u>. Workers who are not employees perform work for the organization but are not in an
- 215 employment relationship with the organization. Control of work implies that the organization directs
- 216 the work performed or has control over the means or methods for performing the work. Workers in
- 217 business relationships work for organizations other than the reporting organization but perform work
- 218 for the organization, such as suppliers. The reporting organization does not control their work. See the
- 219 Control of Work Standard Interpretation to GRI 2: General Disclosures 2021 for more information.

System of GRI Standards

- 221 This Standard is part of the GRI Sustainability Reporting Standards (GRI Standards). The GRI
- 222 Standards enable an organization to report information about its most significant impacts on the
- economy, environment, and people, including impacts on their <u>human rights</u>, and how it manages
- these impacts.

220

- The GRI Standards are structured as a system of interrelated standards that are organized into three
- 226 series: GRI Universal Standards, GRI Sector Standards, and GRI Topic Standards (see Figure 1 in
- this Standard).

228 Universal Standards: GRI 1, GRI 2 and GRI 3

- 229 GRI 1: Foundation 2021 specifies the requirements that the organization must comply with to report in
- accordance with the GRI Standards. The organization begins using the GRI Standards by consulting
- 231 *GRI 1*.
- 232 GRI 2: General Disclosures 2021 contains disclosures that the organization uses to provide
- 233 information about its reporting practices and other organizational details, such as its activities,
- governance, and policies.
- 235 GRI 3: Material Topics 2021 provides guidance on how to determine material topics. It also contains
- disclosures that the organization uses to report information about its process of determining material
- topics, its list of material topics, and how it manages each topic.

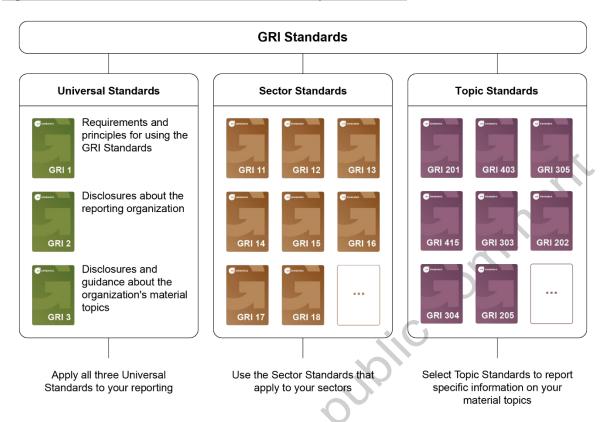
238 Sector Standards

- The Sector Standards provide information for organizations about their likely material topics. The
- organization uses the Sector Standards that apply to its sectors when determining its material topics
- and when determining what to report for each material topic.

242 Topic Standards

- 243 The Topic Standards contain disclosures that the organization uses to report information about its
- impacts in relation to particular topics. The organization uses the Topic Standards according to the list
- of material topics it has determined using GRI 3.





247

248

249

250251

252

253

254

255

256257

258259

260

261262

263

264

Using this Standard

This Standard can be used by any organization – regardless of size, type, sector, geographic location, or reporting experience – to report information about its <u>impacts</u> related to forced labor. In addition to this Standard, disclosures that relate to this topic can be found in:

- GRI CL: Child Labor 202X
- GRI EMPL: Employment 202X
 - GRI LRBR: Labor Rights in Business Relationships 202X
 - GRI NDEO: Non-Discrimination and Equal Opportunity 202X
 - GRI REWO: Remuneration and Working Time 202X
 - GRI TRED: Training and Education 202X
 - Control of Work Standard Interpretation to GRI 2: General Disclosures 2021
 - GRI 403: Occupational Health and Safety 2018

An organization reporting in accordance with the GRI Standards is required to report the following disclosures if it has determined forced labor to be a material topic:

- Disclosure 3-3 in GRI 3: Material Topics 2021.
- Any disclosures from this Topic Standard that are relevant to the organization's impacts related to forced labor (Disclosure FL 1 through Disclosure FL 6).
- See Requirements 4 and 5 in GRI 1: Foundation 2021.
- 266 Reasons for omission are permitted for these disclosures.
- If the organization cannot comply with a disclosure or with a requirement in a disclosure (e.g., because the required information is confidential or subject to legal prohibitions), the organization is required to specify the disclosure or the requirement it cannot comply with, and provide a reason for



270 271	omission together with an explanation in the GRI content index. See Requirement 6 in GRI 1 for more information on reasons for omission.
272 273 274 275 276	If the organization cannot report the required information about an item specified in a disclosure because the item (e.g., committee, policy, practice, process) does not exist, it can comply with the requirement by reporting this to be the case. The organization can explain the reasons for not having this item, or describe any plans to develop it. The disclosure does not require the organization to implement the item (e.g., developing a policy), but to report that the item does not exist.
277 278 279 280 281	If the organization intends to publish a standalone sustainability report, it does not need to repeat information that it has already reported publicly elsewhere, such as on web pages or in its annual report. In such a case, the organization can report a required disclosure by providing a reference in the GRI content index as to where this information can be found (e.g., by providing a link to the web page or citing the page in the annual report where the information has been published).
282	Requirements, guidance and defined terms
283	The following apply throughout this Standard:
284 285	Requirements are presented in bold font and indicated by the word 'shall'. An organization must comply with requirements to report in accordance with the GRI Standards.
286	Requirements may be accompanied by guidance.
287 288	Guidance includes background information, explanations, and examples to help the organization better understand the requirements. The organization is not required to comply with guidance.
289 290	The Standards may also include recommendations. These are cases where a particular course of action is encouraged but not required.
291	The word 'should' indicates a recommendation, and the word 'can' indicates a possibility or option.
292 293	Defined terms are <u>underlined</u> in the text of the GRI Standards and linked to their definitions in the <u>Glossary</u> . The organization is required to apply the definitions in the Glossary.
	EXPOSUIRE AIRAIL
	ETPO I



1. Topic management disclosures

- An organization reporting in accordance with the GRI Standards is required to report how it manages
- each of its material topics.

294

302

303

309

310

311 312

313

- 297 An organization that has determined forced labor to be a material topic is required to report how it
- 298 manages the topic using Disclosure 3-3 in GRI 3: Material Topics 2021. The organization is also
- required to report any disclosures from this section, Disclosure FL 1 through Disclosure FL 2, that are
- 300 relevant to its impacts related to forced labor.
- 301 This section is therefore designed to supplement and not replace Disclosure 3-3 in GRI 3.

Disclosure FL 1 Policies and assessment for the

organization's activities

- 304 REQUIREMENTS
- 305 The organization shall:
- a. describe its forced labor policies for <u>employees</u> and workers who are not employees,
 including whether and how they align with authoritative intergovernmental instruments;
- 308 b. describe processes to prevent and address forced labor, including:
 - i. how forced labor policies are applied in decision-making about its activities;
 - ii. how its recruitment and labor practices protect employees and workers who are not employees, especially <u>vulnerable</u> or <u>under-represented social groups</u>;
 - iii. monitoring of third parties involved with recruitment or supply of employees and workers who are not employees;
- 314 c. describe the assessment process to identify activities at higher risk of forced labor 315 incidents, including:
- 316 i. the criteria used;
- ii. how it incorporates the views of stakeholders;
- d. describe how its employees and workers who are not employees can access effective grievance mechanisms when forced labor incidents occur in the organization's activities;
- e. describe how worker representatives are involved in developing, implementing, and evaluating forced labor policies.
- 322 **GUIDANCE**
- For clarity, the term 'workers who are not employees' refers to workers who are not employed by the
- 324 organization but whose work is controlled by the organization. See the Control of Work Standard
- 325 Interpretation to GRI 2: General Disclosures 2021 for more information.
- 326 In the context of this disclosure, risk refers to the likelihood of forced labor incidents occurring in the
- organization's activities. It does not refer to risk to the organization.
- 328 Guidance to FL 1-a
- 329 The organization should report whether its forced labor policies pay specific attention to workers from
- vulnerable or under-represented social groups, such as migrants, women, children, young workers, or
- 331 low-skilled or illiterate workers.
- 332 The organization should describe how it ensures that migrant workers' working conditions are as
- favourable as those of local workers, and if they can enter into and terminate employment freely and
- voluntarily, giving reasonable notice in accordance with national law or collective agreements, without
- 335 the threat of a penalty.



- The organization should report whether its forced labor policies are available in relevant languages
- and describe how they are communicated in a manner that reflects the different needs of
- 338 stakeholders. For example, policies may be translated into local languages for migrant workers.
- The organization should describe how the assessment process reported under FL 1-c has informed the actions taken.
- 341 Authoritative intergovernmental instruments related to forced labor include:
 - ILO Declaration on Fundamental Principles and Rights at Work [2]
 - ILO Forced Labour Convention (No. 29) [3]
 - ILO Abolition of Forced Labour Convention (No. 105) [1]
 - ILO Protocol of 2014 to the Forced Labour Convention (P029) [6]
 - ILO Forced Labour Recommendation (No. 203) [4]

Guidance to FL 1-b-ii

342

343

344

345

346

347348

349

350 351

352

353

354

355

356

357

358

365

366 367

368 369

370

371

372

373

374 375

376

377

378

379 380 Examples of recruitment and labor practices to protect employees and workers who are not employees from forced labor include:

- ensuring the free and voluntary signing of clearly written employment contracts that state the terms and conditions of work, notice periods, and rights and responsibilities of the worker;
- providing copies of the contracts with workers in a language they understand;
- having termination policies that state clear notice periods, that all work is voluntary, and that
 workers have the freedom to terminate their contractual relationship with reasonable notice
 and without penalties;
- ensuring workers keep their personal documentation (e.g., identity documents, passports, and resident permits) and maintain freedom of movement;
- prohibiting deductions or fees related to recruitment or retaining work.
- 359 See references [5], [12] and [14] in the Bibliography.
- The organization should report whether and how its non-compete clauses in written contracts respect the freedom of employees and workers who are not employees to leave and seek other work. This includes ensuring that non-compete clauses are limited in scope, duration, and geography. The organization can also explain the reasons for having the clauses, such as legitimate interests (e.g., protection of confidential information or client lists).

Guidance to FL 1-b-iii

If the organization uses third parties (e.g., employment agencies or contractors) to recruit or supply employees or workers who are not employees, it should describe how it monitors the following:

- the third parties' formal registrations, regulatory compliance, and certification by competent authorities;
- recruitment fees charged to workers, including those related to official documents and work permits;
- the types of contracts and working conditions, including remuneration, working time, and overtime, especially in high-risk regions of forced labor;
- documents requested from workers and whether they are withheld, restricting their movement or ability to leave work;
- monetary or non-monetary deposits (such as workers' documents);
- financial penalties imposed on workers who choose to leave work at any time;
- financial bonds offered to workers for an extended period, not constituting a potential for coercion or debt bondage;
- legal disputes or grievances against third parties.
- Examples of how to monitor third parties include rigorous screening, capacity-building on fundamental principles and rights at work, or auditing for social compliance. For more information on how third parties providing workers who are not employees can be monitored to ensure adherence to international labor standards, see the Guidance to EMPL 1-c in *GRI EPML: Employment 202X*.



- 385 See references [7] and [12] in the Bibliography.
- 386 Guidance to FL 1-c
- 387 The organization should report the scope of the risk assessment, such as the regions or sectors
- 388 included and the number of operations assessed.
- 389 The organization should report whether all its activities are included in the forced labor risk
- 390 assessment or whether it prioritizes certain activities. The organization should describe how the
- 391 assessment process is updated to reflect emerging risks or changes in its operations, or geographic
- 392 or societal contexts.
- 393 The organization should describe the methods used to identify activities at higher risk of forced labor
- 394 incidents, for example, economic, environmental, social, and human rights impact assessments,
- 395 grievance mechanisms, or using information from external sources, such as civil society
- 396 organizations. The organization should describe the sources and the evidence it has used to assess
- 397 the risk level.

404 405

406

407

408

409

410

411 412

413 414

415

416 417

418 419

420

422

423

424

425

- 398 The organization can report who conducts the assessment, for example, the organization itself,
- 399 external consultants, or NGOs. If the organization conducts the assessment itself, it can report which
- 400 departments conducted it.
- 401 See references [15] and [19] in the Bibliography.
- 402 Guidance to FL 1-c-i
- 403 Criteria to identify activities at higher risk of forced labor incidents include:
 - Region high-risk regions can be identified through credible sources such as the ILO and national labor inspectorates. Risk factors include poverty conditions and a lack of employment and educational opportunities.
 - Sector some sectors can have a higher prevalence of forced labor due to their activities, products, and production processes.
 - Product and production process certain products and production processes carry a higher risk of forced labor due to their nature, such as those providing seasonal or hazardous work, or because the work takes place at remote sites.
 - Business models and practices risks of forced labor can increase when organizations rely
 on third-party labor providers, focus on lowest-cost production, set short delivery timelines, or
 use home-based, informal, or subcontracted work.
 - Workforce demographics predominance of workers from vulnerable or under-represented social groups, such as migrant workers, women workers, and apprentices.
 - Track record activities with a history of poor performance on forced labor or weak human rights <u>due diligence</u> present a higher risk.
 - Allegations reports of forced labor allegations from the media and civil society can also signal higher-risk activities or organizations.
- 421 Forced labor risks from an assessment of an organization's activities include:
 - isolation of workers due to the nature of the work;
 - workers with irregular legal status;
 - excessive overtime;
 - reliance on employment agencies;
- extensive subcontracting;
 - presence of workers from vulnerable groups (e.g., migrants);
- presence of temporary workers;
- 429 See references [12], [15] and [19] in the Bibliography.
- 430 Guidance to FL 1-c-ii
- 431 Examples of stakeholders are workers, trade union representatives, community representatives, and
- 432 local NGOs.



- 433 The organization should describe how stakeholder views were collected, for example, through site 434 visits or interviews. Guidance to FL 1-d 435 436 Examples of grievance mechanisms include hotlines, web portals, in-person reporting, and 437 suggestion boxes. 438 Accessibility means that users are informed about grievance mechanisms and receive support if they 439 face barriers to using them. 440 The organization should describe whether and how grievance mechanisms are user-friendly for 441 workers. For example, the grievance mechanisms are accessible in local languages and designed for 442 workers who are less literate, using colors or pictures. The organization should describe how it clearly communicates reporting procedures for a forced labor 443 444 incident to employees and workers who are not employees in a way that they can understand. 445 The organization should describe how communities and other stakeholders can access effective 446 grievance mechanisms in cases of forced labor incidents. For more information on grievance mechanisms, see Disclosure 2-25 in GRI 2: General Disclosures 447 448 2021.
- 450 Guidance to FL 1-e

449

- Jagin Aicies. The organization can report the frequency of engaging with worker representatives in developing, 451
- 452 implementing, and evaluating forced labor policies.

See references [20] and [21] in the Bibliography.



Disclosure FL 2 Policies and assessment for business

454 relationships

455 **REQUIREMENTS**

459

467

- 456 The organization shall:
- 457 a. describe its forced labor policies for <u>business relationships</u>, including whether they align with:
 - i. authoritative intergovernmental instruments;
- 460 ii. the organization's forced labor policies for employees and workers who are not employees;
- b. report whether it has written agreements addressing forced labor with its business relationships, and if so, provide links to the agreements if publicly available;
- 464 c. describe the assessment process to identify business relationships at higher risk of forced
 465 labor incidents, including:
- 466 i. the criteria used;
 - ii. how the assessment incorporates the views of stakeholders;
- d. describe how it engages with its business relationships to prevent forced labor for workers in business relationships, including any incentives offered;
- e. describe how workers in business relationships can access effective grievance mechanisms in cases of forced labor incidents.

472 **GUIDANCE**

- This disclosure provides information about the organization's efforts to support the elimination of
- forced labor and engage collaboratively with business relationships to prevent forced labor incidents.
- For clarity, the term 'workers who are not employees' refers to workers who are not employed by the
- 476 organization but whose work is controlled by the organization. See the Control of Work Standard
- 477 Interpretation to GRI 2: General Disclosures 2021 for more information.
- 478 In the context of this disclosure, risk refers to the likelihood of forced labor incidents occurring in the
- 479 organization's business relationships. It does not refer to risk to the organization.

480 Guidance to FL 2-a

- 481 The organization should describe how its forced labor policy commitments are integrated into the
- 482 selection, approval, and evaluation processes of business relationships.
- 483 A strict zero-tolerance, compliance-based approach to addressing forced labor can be
- 484 counterproductive, as it may drive the issue underground leading business relationships to conceal
- 485 incidents to avoid losing contracts and increasing workers' vulnerabilities to forced labor conditions.
- The organization should report whether it promotes zero-tolerance policies on forced labor, and if so,
- 487 whether these approaches can lead to the termination of business relationships, which could limit
- 488 opportunities to address negative forced labor impacts. The organization should also report whether it
- 489 has assessed the potential negative impacts of zero-tolerance policies and how it mitigates them.
- The organization can report whether it integrates forced labor into its <u>human rights</u> policies or whether
- 491 it has a standalone policy document related to forced labor, such as a business code of conduct.
- 492 See references [15], [18] and [21] in the Bibliography.
- 493 Guidance to FL 2-a-i
- 494 The organization can describe how it promotes and invests in systems that align with authoritative
- 495 intergovernmental instruments across its business relationships to address forced labor effectively.



- 496 For example, when selecting new business relationships, the organization can describe how it
- 497 requires a demonstration of compliance with authoritative intergovernmental instruments. This can
- 498 include reviewing the recruitment and termination practices of business relationships.

499 Guidance to FL 2-b

- 500 Examples of written agreements can include clauses in contracts, codes of conduct, sourcing policies,
- or purchase orders that provide guidance on how business relationships can effectively contribute to
- the elimination of forced labor.

503 Guidance to FL 2-c

- Requirement FL 2-c entails describing the assessment process to identify business relationships at
- 505 higher risk of forced labor incidents, in addition to the assessment process reported under LRBR 1-6
- 506 in GRI LRBR: Labor Rights in Business Relationships 202X. If the organization has described its
- assessment process for the risk of forced labor incidents under LRBR 1-c, it can provide a reference
- 508 to this information under FL 2-c and does not need to repeat the information.
- 509 When the organization has many business relationships, it should report how it identifies areas with a
- 510 higher risk of forced labor incidents and how it prioritizes their assessment. It should also report the
- general areas at higher risk, such as specific raw materials, processes, regions, or types of workers.

512 Guidance to FL 2-c-i

515 516

517

518 519

520

521 522

526

527 528

529 530

531 532

533

534

535

536 537

538 539

- In addition to the criteria mentioned in FL 1-c-i, some specifically related to business relationships include:
 - Human rights and risk management risks of forced labor increase in the absence of human rights policies and <u>due diligence</u> processes, as well as an over-reliance on social audits, the absence of <u>grievance mechanisms</u>, and poor visibility of complex <u>supply chains</u>.
 - Size of suppliers the size and formality of suppliers, particularly in high-risk sectors, can have a significant role in determining the risk of forced labor.
 - Sub-contractors use of sub-contractors can increase the likelihood of forced labor, particularly in lower-tier operations, such as tier 3 or 4, where oversight and compliance mechanisms can be weaker.
- The organization should describe any limitations or exclusions, for example, whether it has excluded business relationships from certain parts of its <u>value chain</u> when assessing the risk of incidents.
- 525 See references [15] and [19] in the Bibliography.

Guidance to FL 2-d

- Examples of engagement with business relationships to implement forced labor policies are:
 - Capacity building and support training, workshops, and guidance on identifying, preventing, and remediating forced labor risks, understanding policies and legal requirements, and developing internal systems, such as recruitment practices and grievance mechanisms.
 - Collaboration and continuous engagement ongoing dialogue and shared responsibility to address forced labor risks, exchange best practices, and foster continuous improvement through long-term partnerships.
 - Monitoring and feedback collecting and integrating feedback from business relationships and affected stakeholders, especially from affected workers or communities, into policy implementation and remediation.
 - Tailored engagement when many migrant workers are involved, development of tailored engagement activities to ensure recruitment and labor practices align with national laws and authoritative intergovernmental instruments.
- The organization can describe whether compliance with forced labor policy commitments is included in business relationship performance metrics.
- Examples of incentives offered to business relationships are preferential contracting for actions to prevent forced labor and recognition programs.



544	See references [9], [11] and [15] in the Bibliography.
545	Guidance to FL 2-e
546 547	The organization can include whether its grievance mechanism is linked to an operational-level grievance mechanism.
548 549 550	For example, the organization can describe how grievances received from a business relationship's hotline are referred to and jointly addressed through its own operational-level grievance mechanism ensuring consistent handling, oversight, and remediation of issues across its <u>value chain</u> .
551 552	See Guidance to FL 1-d for guidance on how to report on the accessibility of grievance mechanisms for forced labor incidents in business relationships.
553 554	For more information on grievance mechanisms, see Disclosure 2-25 in <i>GRI 2: General Disclosures</i> 2021.
555	See reference [9] in Bibliography.
	EXPOSURE ARM



2. Topic disclosures

- An organization reporting in accordance with the GRI Standards is required to report any disclosures
- from this section (Disclosure FL 3 through Disclosure FL 6) that are relevant to its impacts related to
- 559 forced labor.

556

560

578

579

580 581

582

583

584

Disclosure FL 3 High-risk activities

- 561 **REQUIREMENTS**
- 562 The organization shall:
- a. for each region, report the types of activities at a higher risk of forced labor;
- 564 b. describe actions taken to address the higher risks of forced labor.
- 565 **GUIDANCE**
- 566 Certain activities can have a higher risk of forced labor due to the region or sector in which an
- organization operates, as well as from broader social factors, such as poverty or a lack of
- 568 employment and educational opportunities.
- 569 Guidance to FL 3-a
- 570 Examples of high-risk activities include agricultural work (e.g., harvesting coffee), fishing, mining (e.g.,
- extraction), manufacturing tasks (e.g., assembly or sewing), service roles (e.g., domestic work), and
- 572 construction (e.g., bricklaying).
- 573 Guidance to FL 3-b
- 574 The organization should describe whether and how it prioritizes forced labor risks for prevention and
- 575 mitigation. It should also describe how actions are tailored to the specific risks identified and how their
- 576 effectiveness is evaluated.
- 577 Examples of actions include:
 - training to ensure <u>employees</u> and workers who are not employees understand forced labor policies and remediation protocols;
 - allocating adequate internal resources to respond effectively to forced labor incidents;
 - ensuring remediation actions are effectively implemented, monitored, and tracked;
 - engaging with workers, trade unions, law enforcement, community representatives, and civil society organizations to identify risks early;
 - participating in industry or sector initiatives to address higher risks of forced labor.
- If the organization uses prisoners for labor, it should describe how it ensures that the work is voluntary and that working conditions (e.g., remuneration and benefits, working time, and occupational health and safety) are comparable to those of free workers.
- See references [9], [10] and [14] in the Bibliography.



Disclosure FL 4 High-risk business relationships

590 **REQUIREMENTS**

- 591 The organization shall:
- 592 a. for each region, report the number of <u>business relationships</u> identified as having a higher risk of forced labor;
- 594 b. for each region, report the types of business relationships at higher risk of forced labor;
- 595 c. describe actions taken to address forced labor risks in these business relationships.
- 596 **GUIDANCE**

589

601

602

603 604

605

607

608

609

610 611

612

613

614

615

616

- 597 Guidance to FL 4-a and FL 4-b
- Types of business relationships can include suppliers, franchisees, licensees, joint venture partners, investors, clients, contractors, customers, and consultants.
- 600 See Table 1 for an example of how to present the information on FL 4-a and FL 4-b.

Table 1. Template for presenting information on the number and types of business relationships at higher risk of forced labor by region

	Number of high-risk business relationships	Types of business relationships at a higher risk of forced labor
Region A		
Region B		
Region C		
Region D		

The organization can report the results of its forced labor risk assessment, such as the regions or sectors identified as having higher risk.

Guidance to FL 4-c

- 606 Examples of actions to address forced labor risks in business relationships include:
 - communicating expectations and contractual requirements;
 - ensuring robust forced labor policies and processes across the <u>value chain</u>;
 - using leverage, such as through commercial influence and collaborative action, to prevent or mitigate forced labor risks;
 - providing capacity building and technical support to identify risks;
 - avoiding incentives that could inadvertently encourage business relationships to use forced labor;
 - collaborating with business relationships to implement remediation plans; and
 - adjusting purchasing practices to ensure fair lead times, stable contracts, and transparent pricing.
- The actions taken can include how the organization works together with its business relationships, either directly or through local or sector initiatives.
- See references [15], [16] and [21] in the Bibliography.



Disclosure FL 5 Incidents in the organization's activities

621 **REQUIREMENTS**

- 622 The organization shall:
- a. report the total number of forced labor incidents in the organization's activities, and a breakdown of this total by region;
- 625 b. for each region, report the types of forced labor incidents;
- c. for each region, report the number of <u>employees</u> and workers who are not employees
 affected by forced labor incidents;
- d. for each region, describe the actions taken or planned to address each type of forced labor incident, including:
- 630 i. providing for or cooperating in <u>remediation</u>;
 - ii. preventing future incidents;
- 632 iii. addressing root causes;
- 633 e. report contextual information necessary to understand how the data has been compiled, 634 including standards, methodologies, and assumptions used.

635 **GUIDANCE**

- In the context of this disclosure, an 'incident' refers to a legal action or complaint registered with the reporting organization or competent authorities through a formal process or an instance of noncompliance identified through established procedures. Established procedures to identify instances of non-compliance can include management system audits, formal monitoring programs, or grievance mechanisms. These procedures are usually embedded in the organization's management system in
- the form of a code of conduct or stated business principles.
- Examples of forced labor incidents include withholding wages, not paying <u>workers</u>, or retaining their
- identity documents to compel them to work against their will.
- The number of forced labor incidents can provide insight into the effectiveness of the organization's
- approach to preventing and addressing forced labor. Quantitative data, such as the number of
- 646 incidents, is unlikely to be sufficient on its own. For example, a low number of reported incidents could
- 647 indicate that few incidents occurred, or that people are unable or unwilling to report them. For this
- reason, contextual information should be provided to help users effectively interpret the data.
- An incident can refer to one worker affected or several workers affected.
- 650 If the organization cannot disclose specific information (e.g., because of workers' right to privacy), it
- can provide the information in an aggregated or anonymized form.
- The organization can report the status of the incident. For example, if a case is still open, in the
- 653 process of being resolved, or closed.
- A region can refer to a country or other geographic locations, such as a city or a world region.
- 655 This disclosure covers employees and workers who are not employees. For clarity, the term 'workers
- who are not employees' refers to workers who are not employed by the organization but whose work
- 657 is controlled by the organization. See the Control of Work Standard Interpretation to GRI 2: General
- 658 Disclosures 2021 for more information.
- 659 Guidance to FL 5-a, FL 5-b, and FL 5-d
- See Table 2 for an example of how to present the information on FL 5-a, FL 5-b, and FL 5-d.



Table 2. Template for presenting information on forced labor incidents and related actions by region

	Number of incidents	Type of incidents	Remediation actions	Preventive actions	Actions addressing root causes
Region A					
Region B					
Region C					
Region D					
Total					

- Types of forced labor incidents can include coercion in employment, debt bondage, forced overtime, the worst forms of child labor, and human trafficking.
- For each identified incident of forced labor, the organization can report the age and gender of employees or workers who are not employees affected, and whether they belong to any <u>vulnerable</u> or under-represented social groups.
- The organization can provide comparisons of the number of forced labor incidents with industry or regional data.
- The organization can also report whether an incident appears to be a recurrence or part of a systemic problem.

672 Guidance to FL 5-d-i

661

662

674

675 676

677

678

679

692

693

694

695 696

697

673 Examples of remediation actions for forced labor incidents include:

- ensuring the safe withdrawal of affected workers from forced labor and providing them with appropriate support services, such as psychosocial rehabilitation, education, and vocational training;
- facilitating the safe repatriation of migrant workers;
- providing access to viable economic alternatives or financial compensation;
- providing legal protection and fair entitlements to workers;
- The organization should describe how decisions regarding remediation of forced labor incidents are made, including identifying appropriate remedies and determining who is responsible for implementation (e.g., senior management, sustainability or human rights teams, in consultation with local partners).
- The organization should report whether and how it engages with governments to develop remediation efforts for forced labor incidents. The organization can report whether it engages with other relevant stakeholders to remediate forced labor incidents, such as trade unions, civil society, and international groups.
- The organization can describe how it monitors remediation outcomes and evaluates effectiveness.
- See references [12] and [14] in the Bibliography.

690 Guidance to FL 5-d-ii

- 691 Examples of actions to prevent forced labor incidents include:
 - ensuring that workers always have free access to their documentation, e.g., identity documents, passports, and resident permits;
 - ensuring that written contracts are provided to workers, indicating the terms and conditions, the voluntary nature of work, the freedom to leave and respective procedures, and any penalties that may be associated with a departure or cessation of work;
 - training human resources, compliance officers, and auditors to identify forced labor;



- implementing recruitment practices aligned with the ILO general principles and operational guidelines for fair recruitment, ensuring transparency and fairness when recruiting workers;
 - raising awareness of the risks of forced labor among workers.
- The organization can report whether it participates in any industry, multi-stakeholder, or collaborative initiatives to prevent forced labor.
- 703 See references [12] and [14] in the Bibliography.

704 Guidance to FL 5-d-iii

700

712

713

714

715

- This requirement provides information on the actions taken or planned to address systemic drivers of forced labor. This is different from the actions taken or planned to remediate specific forced labor incidents reported under FL 5-c-i.
- While common global patterns exist among the root causes of forced labor such as poverty, poor labor conditions, and weak law enforcement the ways these factors manifest are context-specific. Root causes are those specific contextual and structural factors that increase forced labor risks and manifest differently based on the regions, sectors, and products, including:
 - weak rule of law and poor enforcement of labor laws;
 - social norms and attitudes:
 - weak structural conditions for development and social protection;
 - poverty, inequality, and lack of access to basic services;
- inadequate social protections and vulnerability to economic shocks;
- conflict, climate, and other crises;
- 118 large informal economy;
- rural areas with inadequate infrastructure;
 - lack of understanding of what forced labor is among workers;
- using employment agencies for recruitment.
- Actions to address forced labor include supporting poverty-reduction initiatives, monitoring employment agencies, and providing training and skills programs to empower vulnerable workers, such as migrants.
- such as migrants.
- The organization should explain how the actions taken or planned to address the root causes of
- forced labor are prioritized and whether and how they are implemented in collaboration with
- 727 stakeholders, and how their effectiveness in reducing forced labor risks is monitored over time.
- 728 See references [12] and [21] in the Bibliography.



Disclosure FL 6 Incidents in business relationships

730 REQUIREMENTS

729

740

- 731 The organization shall:
- 732 a. report the total number of forced labor incidents in <u>business relationships</u>, and a breakdown of this total by region;
- b. for each region, report the type of forced labor incidents in business relationships;
- 735 c. for each region, report the number of workers in business relationships affected by forced labor incidents;
- d. for each region, describe the actions taken or planned to address each type of incident of
 forced labor in business relationships, including:
- 739 i. providing for or cooperating in <u>remediation</u>;
 - ii. preventing future incidents;
- 741 iii. addressing root causes;
- e. report the number of business relationships terminated due to forced labor incidents;
- 743 f. report contextual information necessary to understand how the data has been compiled, 744 including standards, methodologies, and assumptions used.

745 **GUIDANCE**

- In the context of this disclosure, an 'incident' refers to a legal action or complaint registered with the
- 747 reporting organization, business relationships or competent authorities through a formal process or an
- 748 instance of non-compliance identified through established procedures.
- An incident can refer to one worker affected or several workers affected.
- 750 The organization is expected to identify and monitor forced labor incidents in its business
- 751 relationships. For example, it can conduct audits or engage directly with business relationships to
- 752 identify potential or existing forced labor incidents.
- A region can refer to a country or other geographic locations, such as a city or a world region.
- 754 The organization can report the status of the incident. For example, if a case is still open, in the
- 755 process of being resolved, or closed.

756 Guidance to FL 6-a, FL 6-b and FL 6-d

- 757 See Table 3 for an example of how to present the information on FL 6-a, FL 6-b, and FL 6-d.
- Table 3. Template for presenting information on forced labor incidents and related actions in
 business relationships by region

1,45	Number of incidents	Type of incidents	Remediation actions	Actions addressing root causes
Region A				
Region B				
Region C				
Region D				
Total				



760 Guidance to FL 6-d

- 761 The organization can report whether its actions contribute to broader community efforts to eliminate
- 762 forced labor, for example, by participating in industry-level initiatives; cooperating with trade unions or
- law enforcement authorities; or supporting a national plan.

764 Guidance to FL 6-d-i

- The organization should report whether it encourages or requires its business relationships to provide
- for or cooperate in remediation when forced labor incidents are found. The organization should report
- 767 who is responsible for ensuring remediation measures are implemented across business
- 768 relationships.
- 769 See Guidance to FL 5-d-i for examples of actions to provide for or cooperate in the remediation of
- 770 forced labor incidents.

771 Guidance to FL 6-d-ii

- 772 Examples of actions to prevent future incidents in business relationships include strengthening
- 773 supplier requirements, providing reasonable contractual terms for goods and services purchased from
- 774 business relationships; providing training and capacity building on preventing forced labor,
- 775 collaborating with local communities or NGOs, enhancing monitoring mechanisms to improve
- 776 recruitment practices, and enhancing <u>due diligence</u> for business relationships operating in conflict-
- affected and high-risk areas or in remote areas.
- 778 See Guidance to FL 5-b-ii for more examples of actions to prevent forced labor incidents.

779 Guidance to FL 6-d-iii

- 780 This requirement provides information on the actions taken or planned to address systemic drivers of
- 781 forced labor. This is different from the actions taken or planned to remediate specific forced labor
- 782 incidents reported under FL 6-b-i.
- The organization can describe how it considers the broader social, economic, and cultural context in
- 784 which forced labor incidents occur and adapts its actions to address systemic drivers.
- 785 See Guidance to FL 5-d-iii for a list of root causes of forced labor.
- 786 Examples of actions to address the root causes of forced labor in business relationships include:
 - participating in initiatives that reduce poverty rates when workers earn less than the cost of living:
 - coordinating, monitoring, and remediation services with public systems;
 - capacity building to identify and prevent incidents;
 - linking incidents to social protection, education, and child welfare services; increasing <u>supply</u> <u>chain</u> traceability on hidden or informal production where forced labor may occur;
 - supporting national action plans against forced labor;
 - raising awareness of forced labor and modern slavery;
- 795 See references [12] and [21] in the Bibliography.

796 Guidance to FL 6-e

787

788 789

790

791 792

793

794

798

799

800

801 802

803

804

- 797 The organization can report:
 - the types of business relationships terminated (e.g., <u>suppliers</u>, contractors, sub-contractors, distributors, franchisees);
 - the criteria for termination (e.g., repeated non-compliance, lack of cooperation with remediation, severity of incident);
 - whether termination occurred immediately upon discovery of a forced labor incident or after remediation;
 - steps taken to address the negative impacts of termination on affected workers and local communities.



- Where no business relationships were terminated due to forced labor incidents, a brief statement of this fact is sufficient to comply with the requirement.
- 808 See reference [17] in the Bibliography.

EXPOSINE draft for public comment



Glossary 809 This glossary provides definitions for terms used in this Standard. The organization is required to 810 811 apply these definitions when using the GRI Standards. The definitions included in this glossary may contain terms that are further defined in the complete 812 813 GRI Standards Glossary. All defined terms are underlined. If a term is not defined in this glossary or in 814 the complete GRI Standards Glossary, definitions that are commonly used and understood apply. basic salary 815 fixed, minimum amount paid to an employee for performing his or her duties 816 Note: Basic salary excludes any additional remuneration, such as payments for overtime working or 817 818 bonuses. 819 business partner 820 entity with which the organization has some form of direct and formal engagement for the purpose of 821 meeting its business objectives 822 Source: Shift and Mazars LLP, UN Guiding Principles Reporting Framework, 2015; modified 823 Examples: affiliates, business-to-business customers, clients, first-tier suppliers, franchisees, joint venture partners, investee companies in which the organization has a shareholding position 824 Note: Business partners do not include subsidiaries and affiliates that the organization controls. 825 826 business relationships 827 relationships that the organization has with business partners, with entities in its value chain including 828 those beyond the first tier, and with any other entities directly linked to its operations, products, or 829 services 830 Source: United Nations (UN), Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework, 2011; modified 831 Note: Examples of other entities directly linked to the organization's operations, products, or services 832 833 are a non-governmental organization with which the organization delivers support to a local 834 community or state security forces that protect the organization's facilities. 835 due diligence 836 process to identify, prevent, mitigate, and account for how the organization addresses its actual and 837 potential negative impacts 838 Source: Organisation for Economic Cooperation and Development (OECD), OECD Guidelines for Multinational Enterprises, 2011; modified 839 United Nations (UN), Guiding Principles on Business and Human Rights: Implementing the United 840 Nations "Protect, Respect and Remedy" Framework, 2011; modified 841 842 Note: See section 2.3 in GRI 1: Foundation 2021 for more information on 'due diligence'. 843 employee 844 individual who is in an employment relationship with the organization according to national law or 845 practice 846 forced or compulsory labor 847 all work and service that is exacted from any person under the menace of any penalty and for which 848 the said person has not offered herself or himself voluntarily 849 Source: International Labour Organization (ILO), Forced Labour Convention, 1930 (No. 29); modified



- Note 1: The most extreme examples of forced or compulsory labor are slave labor and bonded labor,
- but debts can also be used as a means of maintaining workers in a state of forced labor.
- 852 Note 2: Indicators of forced labor include withholding identity papers, requiring compulsory deposits,
- and compelling workers, under threat of firing, to work extra hours to which they have not previously
- 854 agreed.
- 855 grievance
- perceived injustice evoking an individual's or a group's sense of entitlement, which may be based on
- law, contract, explicit or implicit promises, customary practice, or general notions of fairness of
- 858 aggrieved communities
- 859 Source: United Nations (UN), Guiding Principles on Business and Human Rights: Implementing the
- 860 United Nations "Protect, Respect and Remedy" Framework, 2011
- 861 grievance mechanism
- 862 routinized process through which grievances can be raised and remedy can be sought
- 863 Source: United Nations (UN), Guiding Principles on Business and Human Rights: Implementing the
- 864 United Nations "Protect, Respect and Remedy" Framework, 2011; modified
- Note: See Guidance to Disclosure 2-25 in GRI 2: General Disclosures 2021 for more information on
- 866 'grievance mechanism'.
- 867 human rights
- 868 rights inherent to all human beings, which include, at a minimum, the rights set out in the *United*
- 869 Nations (UN) International Bill of Human Rights and the principles concerning fundamental rights set
- 870 out in the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights
- 871 at Work
- 872 Source: United Nations (UN), Guiding Principles on Business and Human Rights: Implementing the
- 873 United Nations "Protect, Respect and Remedy" Framework, 2011; modified
- Note: See Guidance to 2-23-b-i in GRI 2: General Disclosures 2021 for more information on 'human
- 875 rights'.
- 876 impact

885

886 887

888

889 890

891

- effect the organization has or could have on the economy, environment, and people, including on their
- 878 human rights, which in turn can indicate its contribution (negative or positive) to sustainable
- 879 development
- 880 Note 1: Impacts can be actual or potential, negative or positive, short-term or long-term, intended or
- unintended, and reversible or irreversible.
- 882 Note 2: See section 2.1 in GRI 1: Foundation 2021 for more information on 'impact'.
- 883 Indigenous Peoples
- 884 Indigenous Peoples are generally identified as:
 - tribal peoples in independent countries whose social, cultural and economic conditions distinguish them from other sections of the national community, and whose status is regulated wholly or partially by their own customs or traditions or by special laws or regulations;
 - peoples in independent countries who are regarded as indigenous on account of their descent from the populations which inhabited the country, or a geographical region to which the country belongs, at the time of conquest or colonization or the establishment of present state boundaries and who, irrespective of their legal status, retain some or all of their own social, economic, cultural and political institutions.
- Source: International Labour Organization (ILO), *Indigenous and Tribal Peoples Convention*, 1989 (No. 169)



895 local community 896 individuals or groups of individuals living or working in areas that are affected or that could be affected 897 by the organization's activities 898 Note: The local community can range from those living adjacent to the organization's operations to 899 those living at a distance. 900 material topics 901 topics that represent the organization's most significant impacts on the economy, environment, and 902 people, including impacts on their human rights Note: See section 2.2 in GRI 1: Foundation 2021 and section 1 in GRI 3: Material Topics 2021 for 903 904 more information on 'material topics'. 905 mitigation 906 action(s) taken to reduce the extent of a negative impact 907 Source: United Nations (UN), The Corporate Responsibility to Respect Human Rights: An Interpretive 908 Guide, 2012; modified 909 Note: The mitigation of an actual negative impact refers to actions taken to reduce the severity of the 910 negative impact that has occurred, with any residual impact needing remediation. The mitigation of a potential negative impact refers to actions taken to reduce the likelihood of the negative impact 911 912 occurring. 913 remedy / remediation 914 means to counteract or make good a negative impact or provision of remedy 915 Source: United Nations (UN), The Corporate Responsibility to Respect Human Rights: An Interpretive 916 Guide, 2012; modified 917 Examples: apologies, financial or non-financial compensation, prevention of harm through injunctions 918 or guarantees of non-repetition, punitive sanctions (whether criminal or administrative, such as fines), 919 restitution, restoration, rehabilitation 920 remuneration 921 basic salary plus additional amounts paid to a worker 922 Note: Examples of additional amounts paid to a worker can include those based on years of service, 923 bonuses including cash and equity such as stocks and shares, benefit payments, overtime, time 924 owed, and any additional allowances, such as transportation, living and childcare allowances. severity (of an impact) 925 926 The severity of an actual or potential negative impact is determined by its scale (i.e., how grave the impact is), scope (i.e., how widespread the impact is), and irremediable character (how hard it is to 927 928 counteract or make good the resulting harm). 929 Source: Organisation for Economic Cooperation and Development (OECD), OECD Due Diligence 930 Guidance for Responsible Business Conduct, 2018; modified 931 United Nations (UN), The Corporate Responsibility to Respect Human Rights: An Interpretive Guide, 2012; modified 932

Note: See section 1 in GRI 3: Material Topics 2021 for more information on 'severity'.

individual or group that has an interest that is affected or could be affected by the organization's



stakeholder

activities

933934

935

- 937 Source: Organisation for Economic Cooperation and Development (OECD), OECD Due Diligence
- 938 Guidance for Responsible Business Conduct, 2018; modified
- 939 Examples: business partners, civil society organizations, consumers, customers, employees and
- other workers, governments, local communities, non-governmental organizations, shareholders and
- other investors, suppliers, trade unions, vulnerable groups
- 942 Note: See section 2.4 in GRI 1: Foundation 2021 for more information on 'stakeholder'.
- 943 supplier
- 944 entity upstream from the organization (i.e., in the organization's supply chain), which provides a
- 945 product or service that is used in the development of the organization's own products or services
- 946 Examples: brokers, consultants, contractors, distributors, franchisees, home workers, independent
- 947 contractors, licensees, manufacturers, primary producers, sub-contractors, wholesalers
- 948 Note: A supplier can have a direct <u>business relationship</u> with the organization (often referred to as a
- 949 first-tier supplier) or an indirect business relationship.
- 950 **supply chain**
- 951 range of activities carried out by entities upstream from the organization, which provide products or
- 952 services that are used in the development of the organization's own products or services
- 953 sustainable development / sustainability
- 954 development that meets the needs of the present without compromising the ability of future
- 955 generations to meet their own needs
- 956 Source: World Commission on Environment and Development, *Our Common Future*, 1987
- 957 Note: The terms 'sustainability' and 'sustainable development' are used interchangeably in the GRI
- 958 Standards.
- 959 under-represented social group
- 960 group of individuals who are less represented within a subset (e.g., a body or committee, employees
- 961 of an organization) relative to their numbers in the general population, and who therefore have less
- 962 opportunity to express their economic, social, or political needs and views
- Note 1: Under-represented social groups may include minority groups.
- 964 Note 2: The groups included under this definition depend on the organization's operating context and
- are not uniform for every organization.
- 966 value chain
- 967 range of activities carried out by the organization, and by entities upstream and downstream from the
- 968 organization, to bring the organization's products or services from their conception to their end use
- Note 1: Entities upstream from the organization (e.g., <u>suppliers</u>) provide products or services that are
- 970 used in the development of the organization's own products or services. Entities downstream from the
- 971 organization (e.g., distributors, customers) receive products or services from the organization.
- Note 2: The value chain includes the supply chain.
- 973 vulnerable group
- 974 group of individuals with a specific condition or characteristic (e.g., economic, physical, political,
- 975 social) that could experience negative impacts as a result of the organization's activities more
- 976 <u>severely</u> than the general population
- 977 Examples: children and youth; elderly persons; ex-combatants; HIV/AIDS-affected households;
- 978 <u>human rights</u> defenders; <u>indigenous peoples</u>; internally displaced persons; migrant <u>workers</u> and their
- 979 families; national or ethnic, religious and linguistic minorities; persons who might be discriminated
- against based on their sexual orientation, gender identity, gender expression, or sex characteristics



991	worker representative
989 990	Note: In the GRI Standards, in some cases, it is specified whether a particular subset of workers is required to be used.
986 987 988	Examples: employees , agency workers, apprentices, contractors, home workers, interns, self-employed persons, sub-contractors, volunteers, and persons working for organizations other than the reporting organization, such as for suppliers
985	person that performs work for the organization
984	worker
983	Note: Vulnerabilities and impacts can differ by gender.
981 982	(e.g., lesbian, gay, bisexual, transgender, intersex); persons with disabilities; refugees or returning refugees; women

worker representative

992

993

994

995

996

997

998

person who is recognized as such under national law or practice, whether they are:

- a trade union representative, namely, a representative designated or elected by trade unions or by members of such unions; or
- an elected representative, namely, a representative who is freely elected by the workers of the undertaking in accordance with provisions of national laws, regulations, or collective agreements, whose functions do not include activities which are recognized as the exclusive prerogative of trade unions in the country concerned.

workers' Re, Source: International Labour Organization (ILO), Workers' Representatives Convention, 1971 (No. 999 1000



Bibliography

- This section lists authoritative intergovernmental instruments and additional references used in
- developing this Standard.

1001

- 1004 Authoritative instruments:
- 10.05 1. International Labour Organization (ILO), Abolition of Forced Labour Convention, 1957 (No. 105).
- International Labour Organization (ILO), Declaration on Fundamental Principles and Rights at
 Work, 1998.
- 1008 3. International Labour Organization (ILO), Forced Labour Convention, 1930 (No. 29).
- 1009 4. International Labour Organization (ILO), Forced Labour Recommendation, 2014 (No. 203).
- 1010 5. International Labour Organization (ILO), *Migration for Employment Convention (Revised)*, 1949 (No. 97).
- 1012 6. International Labour Organization (ILO), Protocol to the Forced Labour Convention, 2014 (P029).
- International Labour Organization (ILO), *Private Employment Agencies Convention*, 1997
 (No.181).
- International Labour Organization (ILO), Tripartite Declaration of Principles concerning
 Multinational Enterprises and Social Policy, 2022.
- 1017 9. Organisation for Economic Cooperation and Development (OECD), OECD Due Diligence
 1018 Guidance for Responsible Business Conduct, 2018.
- 10. Organisation for Economic Cooperation and Development (OECD), OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, 2023.
- 1021 11. United Nations (UN), Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework, 2011.

1023 Additional references:

- 1024 12. International Labour Organization (ILO), Combating Forced Labour: A Handbook for Employers and Business, 2015.
- 13. International Labour Organization (ILO), Walk Free, and International Organization for Migration (IOM), *Global Estimates of Modern Slavery: Forced Labour and Forced Marriage*, Geneva, 2022.
- 1028 14. International Labour Organization (ILO), Helpdesk: Business, Forced Labour, 2024.
- 15. International Labour Organization (ILO), ILO-IOE Child Labour Guidance Tool for Business: How
 to Do Business With Respect for Children's Right To Be Free from Child Labour, 2015.
- 1031 16. International Labour Organization (ILO), Supplier Guidance on Preventing, Identifying and Addressing Child Labour, 2020.
- 1033 17. Organisation for Economic Cooperation and Development (OECD), *Responsible contracting and responsible exit: the case of child labour*, 2025.
- 1035 18. Save The Children and the Centre for Child Rights and Business, *Child Rights Risk in Global Supply Chains: Why a Zero-Tolerance Approach is not Enough*, 2023.
- 19. The Centre for Child Rights and Business, Tool 6: Information to collect from suppliers for child labour risk mapping, accessed 16 October 2025.
- 1039 20. United Nations (UN), OHCHR Accountability and Remedy Project: Improving Accountability and Access to Remedy in Cases of Business Involvement in Human Rights Abuses, 2025.
- 1041 21. United Nations Children's Fund (UNICEF), Child Labour and Responsible Business Conduct: A
 1042 Guidance Note for Action, 2022.

