

Item 06 – GRI Topic Standard Project for Economic Impact – Competition exposure draft

For GSSB discussion and approval

Date	28 August 2025
Meeting	18 September 2025
Project	GRI Topic Standard Project for Economic Impact
Description	This document sets out the exposure draft of the GRI Topic Standard for Competition, including the explanatory memorandum summarizing the objectives of the project and the significant proposals contained within the draft. These are submitted for GSSB discussion and approval.

This document has been prepared by the GRI Standards Division 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

This explanatory memorandum sets out the objectives for the review of *GRI 206: Anti-competitive Behavior 2016*, the significant proposals contained in the exposure draft, and a summary of the GSSB's involvement and views on the development of the draft.

Objectives for the project

The objective of the economic impact project is to review and revise all GRI economic impact-related Standards and incorporate new issues to reflect stakeholder expectations for reporting the organization's impact on the economy. The economic impact 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 public inquiry, the GSSB, the working group, the GRI Standards Division, and other GRI divisions. Economic impact project details can be found in the [project proposal](#).

The review of *GRI 206: Anti-competitive Behavior 2016*, under Phase 2 of the economic impact project, aims to represent internationally agreed best practice and align with authoritative intergovernmental instruments related to an organization's impact on the economy, environment, and people, such as the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

As part of the GSSB Work Program 2023-2025, the Global Sustainability Standards Board (GSSB) identified the review of *GRI 206: Anti-competitive Behavior 2016* as a priority project for commencement in 2023. Since the GRI disclosures on anti-competitive behavior were last revised, the issue of competition has received significant attention in the global sustainable development agenda. In line with the [GSSB Due Process Protocol](#), a multi-stakeholder working group was established in January 2024 to contribute to the review and content development.

The revised GRI Anti-competitive Behavior Standard highlights the impacts that an organization has on market concentration, its consequences, and the actions the organization pursues to minimize and prevent the impacts.

For more information on the project, consult the [project website](#) and [Terms of Reference](#) of the [Working Group](#).

Significant proposals

The exposure draft, a revision of the *GRI 206: Anti-competitive Behavior 2016* Topic Standard, includes both revised disclosures and new disclosures, aligning with the project objectives outlined above. Notable changes and inclusions in this exposure draft are summarized below.

Title of the standard updated: The exposure draft proposes changing the title of the Standard to 'Competition' to align with the OECD Guidelines for Multinational Enterprises, which use the term 'Competition'. This change follows GRI's naming conventions, which prioritize authoritative instruments to ensure consistency across Standard titles.

Expansion of scope. The exposure draft expands the definition of anti-competitive behavior to include a broader range of practices beyond traditional behaviors, such as price fixing and market allocation, as well as predatory pricing and the abuse of dominant market power. The revised exposure draft includes practices such as monopsony, where dominant buyers exert excessive control over suppliers or labor markets. The exposure draft also highlights the systemic effects of these practices on stakeholders, including small and medium-sized enterprises (SMEs), workers, consumers, and investors.

New topic management disclosure COM-1. The purpose of this disclosure is to provide clarity on the systems in place for preventing anti-competitive behavior, and to show proactive management of competition-related impacts. It supplements Disclosure 3-3 in *GRI 3: Material Topics 2021* and

provides specific reporting requirements on the governance structures, policies, and internal practices designed to prevent such behavior.

Expanded requirements on legal actions regarding anti-competitive behavior in COM-2. This disclosure builds on Disclosure GRI 206-1 while introducing additional reporting requirements, including:

- reporting of legal actions must now be disaggregated into two categories: ongoing and completed;
- description of the main outcomes of completed actions, including: legal decisions, settlement agreements, policy changes, or changes in governance.

New disclosure on communication and training COM-3. Disclosure COM-3 requires the organization to report quantitative data on how it communicates and builds internal awareness around competition. It supports Disclosure COM-1 and enables stakeholders to evaluate the breadth and depth of organizational engagement on the topic. This disclosure ensures that prevention efforts reported in COM-1 are supported by measurable actions.

Expanded guidance for all disclosures. The exposure draft provides organizations with structured and detailed guidance for reporting on competition to align with evolving stakeholder expectations and GRI's system of Standards.

GSSB involvement and views on the development of this draft

The GSSB appointed one of its members as a sponsor for the review of *GRI 206: Anti-competitive Behavior 2016*. The GSSB sponsor observed the WG process and attended most of their meetings.

All GSSB meetings are recorded and made available on the [GSSB GRI YouTube channel](#).

GRI COM: Competition 202X

exposure draft

Content

Introduction	5
Background on the topic	5
System of GRI Standards	6
Using this Standard.....	7
1. Topic management disclosures.....	9
Disclosure COM-1 Prevention of anti-competitive behavior.....	9
2. Topic disclosures.....	11
Disclosure COM-2 Legal actions regarding anti-competitive behavior.....	11
Disclosure COM-3 Communication and training on competition.....	12
Glossary.....	13
Bibliography	15

Introduction

GRI COM: Competition 20XX contains disclosures for organizations to report information about their competition-related impacts, and how they manage these impacts. The disclosures enable an organization to provide information on policy, procedures and incidents regarding their anti-competitive behavior and monopoly practices.

The Standard is structured as follows:

- [Section 1](#) contains one disclosure, which provides information about how the organization manages its competition-related impacts.
- [Section 2](#) contains two disclosures, which provide information about the organization's competition-related impacts.
- 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

This Standard addresses the topic of competition.

Competition refers to a market environment in which organizations independently strive to attract customers, deliver goods and services efficiently, and achieve business objectives such as profits, sales, or market share [2].

When an organization behaves in line with local and national competition laws and regulations, and engages transparently with regulators and competitors, its behavior can have positive impacts such as promoting innovation, efficiency, consumer choice, greater support for small and medium-sized enterprises (SMEs), and well-functioning markets [1].

Conversely, when an organization behaves in a way that goes against local and national competition laws and regulations, for example when an organization engages in practices to maintain or increase their market position and profits, often without delivering lower prices or higher-quality goods or services to consumers, this is considered anti-competitive behavior [2]. Anti-competitive behavior is unethical and often illegal and can have a negative impact on consumers, other organizations, and the broader economy. Common examples of anti-competitive behavior include collusion, price fixing, bid rigging, and the abuse of dominant market power.

Anti-competitive behavior can also affect market structures by restricting competition, leading to or entrenching monopoly and monopsony dynamics. A monopoly refers to a market where one seller holds a dominant position and which can involve practices such as limiting market entry, setting prices below cost, or using scale to reduce competition. A monopsony refers to a market where one or a small number of buyers have significant influence over many sellers, which can affect market outcomes, for example by lowering the prices paid to suppliers or reducing wages for workers.

Ultimately, anti-competitive behavior undermines sustainable development by weakening trust in markets, reducing economic efficiency, and disrupting the fair use of resources needed for long-term social, economic, and environmental well-being. Competition laws and regulatory authorities seek to prevent such practices, but negative impacts are often experienced by stakeholders before regulatory scrutiny, highlighting the importance of transparency and proactive management of competitive behavior.

See references [1] and [2] in the Bibliography.

System of GRI Standards

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

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

Universal Standards: GRI 1, GRI 2 and GRI 3

[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 [GRI 1](#).

[GRI 2: General Disclosures 2021](#) contains disclosures that the organization uses to provide information about its reporting practices and other organizational details, such as its activities, governance, and policies.

[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.

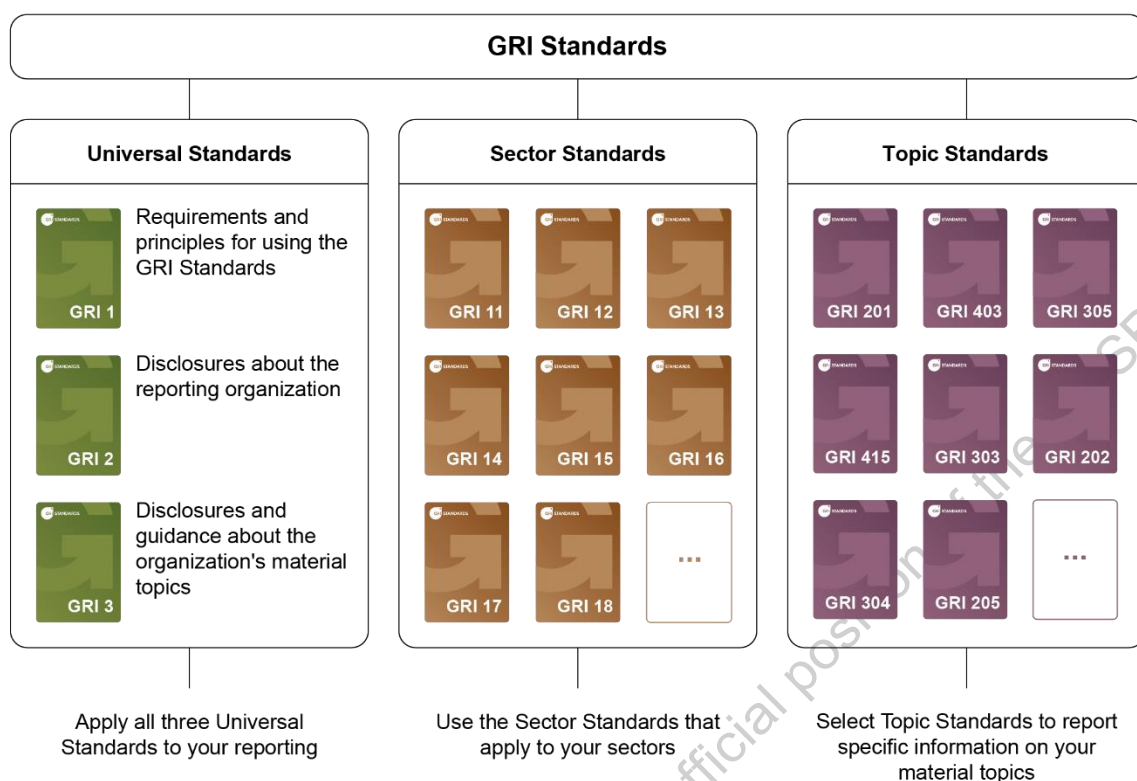
Sector Standards

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.

Topic Standards

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](#).

Figure 1. GRI Standards: Universal, Sector and Topic Standards



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 competition-related impacts.

An organization reporting in accordance with the GRI Standards is required to report the following disclosures if it has determined competition 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 competition-related impacts (Disclosure COM-1 through Disclosure COM-3).

See [Requirements 4 and 5 in GRI 1: Foundation 2021](#).

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 omission together with an explanation in the GRI content index. See [Requirement 6 in GRI 1](#) for more information on reasons for omission.

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.

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).

Requirements, guidance and defined terms

The following apply throughout this Standard:

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.

Requirements may be accompanied by guidance.

Guidance includes background information, explanations, and examples to help the organization better understand the requirements. The organization is not required to comply with guidance.

The Standards may also include recommendations. These are cases where a particular course of action is encouraged but not required.

The word 'should' indicates a recommendation, and the word 'can' indicates a possibility or option.

Defined terms are underlined in the text of the GRI Standards and linked to their definitions in the [Glossary](#). The organization is required to apply the definitions in the Glossary.

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.

An organization that has determined competition to be a material topic is required to report how it manages the topic using [Disclosure 3-3 in GRI 3: Material Topics 2021](#). The organization is also required to report any disclosure from this section (Disclosure COM-1) that is relevant to its competition-related impacts.

This section is therefore designed to supplement – and not replace – Disclosure 3-3 in *GRI 3*.

Disclosure COM-1 Prevention of anti-competitive behavior

REQUIREMENTS

The organization shall:

- a. report the governance bodies or individual roles responsible for overseeing and implementing anti-competitive behavior policies and procedures, and their responsibilities;
- b. describe its approach to communication and training on anti-competitive behavior, including:
 - i. the type and content of the communications and training;
 - ii. the frequency of the communications and training;
 - iii. training requirements for governance body members and employees at a higher risk of non-compliance with anti-competition laws and regulations.

GUIDANCE

This disclosure provides insight into the organization's approach to preventing anti-competitive behavior, including who is responsible for oversight and how the organization ensures that the members of governance bodies and employees in roles at higher risk of anti-competitive conduct have the necessary knowledge and guidance to avoid such behavior.

Guidance to COM-1-a

Oversight of anti-competitive behavior includes activities such as approving and updating policies, assessing risks of anti-competitive conduct, reviewing strategic decisions for compliance, and managing responses to allegations or investigations by regulatory bodies.

This can be done through:

- Board oversight: board committees (e.g., audit or risk committees) often have responsibility for compliance oversight, including anti-competition issues.
- Internal controls and audits: regular audits of sales, procurement, and pricing practices to check for non-compliance, such as price coordination or bid rigging.

[Disclosures 2-12 and 2-13 in GRI 2: General Disclosures 2021](#) require information on the highest governance body's role in overseeing the management of the organization's impacts and how it delegates responsibility for this. If the organization has described the roles and responsibilities of the governance bodies involved in overseeing anti-competitive behavior under Disclosures 2-12 and 2-13, it can provide a reference to this information.

Guidance to COM-1-b

Policies on training and education of employees are covered in the Disclosure TRED-1 Training and education policies of the *GRI draft Standard Training and education* [under revision]. If the organization has reported its approach to training on anti-competitive behavior in TRED-1, the organization can provide a reference to this information.

Guidance to COM-1-b-i

237 Communication on anti-competitive behavior refers to the organization's efforts to share information
238 and conduct awareness-raising activities, internally and externally, to ensure that stakeholders
239 understand its anti-competition policies and procedures. Types of communication include emails,
240 annual reports or briefing sessions by compliance officers.

241 Types of training on anti-competitive behavior include general awareness sessions, role-specific
242 training for high-risk functions or business partners, induction training for new hires, and refresher
243 courses to reinforce understanding over time.

244 The content of the communication refers to whether it covers the organization's internal anti-
245 corruption policies and procedures, provides technical knowledge, or conveys other related
246 information aimed at preventing anti-competitive behavior.

247 Requirement COM-1-b-i is related to Disclosure TRED-2 Types and content of training and education
248 of the *GRI draft Standard Training and education 202X* [under revision]. If the information reported by
249 the organization in Disclosure TRED-2 covers the type and content of training on anti-competitive
250 behavior, the organization can provide a reference to this information.

251 The organization can report how it identifies the need for communication and training based on risk
252 assessments, internal audits, whistleblower reports, or external investigations. The organization can
253 describe the mechanisms it uses to evaluate the effectiveness of the communication and training.

254 **Guidance to COM-1-b-iii**

255 Examples of employees at a higher risk of non-compliance include those in contact with business
256 partners, competitors, or trade associations, as well as members of governance bodies responsible
257 for strategic decisions.

258 The organization can describe the mechanisms it uses to evaluate the effectiveness of the
259 communication and training.

2. Topic disclosures

An organization reporting in accordance with the GRI Standards is required to report any disclosures from this section (Disclosure COM-2 through Disclosure COM-3) that are relevant to its competition-related impacts.

Disclosure COM-2 Legal actions regarding anti-competitive behavior

REQUIREMENTS

The organization shall:

- a. report the total number of legal actions regarding anti-competitive behavior and non-compliance with competition laws and regulations in which the organization has been identified as a participant, and a breakdown of this total by:
 - i. ongoing;
 - ii. completed;
- b. describe the main outcomes of completed legal actions, including any decisions or judgments;
- c. report contextual information necessary to understand how the data has been compiled, including standards, methodologies, and assumptions used.

GUIDANCE

Legal actions are publicly disclosed cases relating to an organization's non-compliance with applicable anti-trust, anti-monopoly, or competition laws. Legal actions are initiated by public authorities, regulators, or other third parties such as other organizations or employees, as a result of investigations, or legal proceedings.

Guidance to COM-2-a

Ongoing legal actions regarding anti-competitive behavior refers to cases that have been formally initiated but have not yet reached a final resolution within the reporting period. For example, an investigation by a competition authority into alleged price-fixing that is still underway.

Completed legal actions regarding anti-competitive behavior refer to cases that have been resolved during the reporting period through a final judgement, settlement, dismissal or other formal closure. For example, a court ruling resolving allegations of abuse of market dominance or bid-rigging.

Guidance to COM-2-b

Examples of outcomes of completed legal actions include:

- fines or settlement amounts paid to regulators or consumers;
- changes to internal policies or procedures;
- consequences for the members of the governance body, such as the replacement of governance body members.

Disclosure 2-27 Compliance with laws and regulations in *GRI 2: General Disclosures 2021* requires reporting information on significant instances of non-compliance with laws and regulations, including fines. If the organization has reported this information under Disclosure 2-27, it can provide a reference to this information.

Disclosure COM-3 Communication and training on competition

REQUIREMENTS

The organization shall:

- a. report, in head count, the total number and percentage of employees that received communication on its anti-competition policies and procedures and a breakdown of this total by significant functions;
- b. report, in head count, the total number and percentage of governance body members that received communication on its anti-competition policies and procedures and a breakdown of this total by significant functions;
- c. report, in head count, the total number and percentage of employees that completed training and education on its anti-competition policies and procedures and a breakdown of this total by significant functions;
- d. and the members of the governance body members that completed training and education on its anti-competition policies and procedures and a breakdown of this total by significant functions;
- e. report the definition used for 'significant functions'.

GUIDANCE

Communication and training on competition policies and procedures, as well as competition law, can help prevent anti-competitive behavior and ensure consistency in compliance across the organization. According to the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, employees should be aware of relevant competition laws and regulations, and in particular, training should be provided for relevant members of the governance body.

Functions refer to the main activities and processes that an organization performs to achieve its objectives. These include core functions, which directly generate income or deliver value such as manufacturing, sales, finance, and procurement, and support functions, which enable and facilitate the operation of core functions, for example: marketing, human resources, research and development, and distribution.

Significant functions refers to areas of the organization where decisions or activities could create or influence risks of anti-competitive behavior. These may be the same across different disclosures or vary depending on the organization's impacts. For example, governance body members making decisions on mergers, procurement teams applying predatory pricing practices, or sales functions engaging in market allocation.

The organization can report whether training and communication about anti-competitive behavior policies and procedures have been provided to any other persons or organizations than those covered by this disclosure, and, if so, to which persons or organizations.

See reference [1] in the [Bibliography](#)

Guidance to COM-3-a and COM-3-b

The organization can report the information under COM 3-a and COM 3-b for employees with a breakdown by country, employee type.

Receiving communication on anti-corruption policies and procedures refers to employees, workers, and governance body members being made aware of the organization's expectations, rules, and practices for preventing anti-competitive behavior, through channels such as policy documents, internal newsletters, or other awareness-raising activities.

Guidance to COM-3-c and COM-3-d

Completed anti-competitive behavior training means that the employees have fulfilled program requirements in terms of hours of attendance, activities, and assessments during the reporting period.

Glossary

This glossary provides definitions for terms used in this Standard. The organization is required to apply these definitions when using the GRI Standards.

The definitions included in this glossary may contain terms that are further defined in the complete [GRI Standards Glossary](#). All defined terms are underlined. If a term is not defined in this glossary or in the complete *GRI Standards Glossary*, definitions that are commonly used and understood apply.

business partner

entity with which the organization has some form of direct and formal engagement for the purpose of meeting its business objectives

Source: Shift and Mazars LLP, *UN Guiding Principles Reporting Framework*, 2015; modified

Examples: affiliates, business-to-business customers, clients, first-tier suppliers, franchisees, joint venture partners, investee companies in which the organization has a shareholding position

Note: Business partners do not include subsidiaries and affiliates that the organization controls.

business relationships

relationships that the organization has with business partners, with entities in its value chain including those beyond the first tier, and with any other entities directly linked to its operations, products, or services

Source: United Nations (UN), *Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework*, 2011; modified

Note: Examples of other entities directly linked to the organization's operations, products, or services are a non-governmental organization with which the organization delivers support to a local community or state security forces that protect the organization's facilities.

employee

individual who is in an employment relationship with the organization according to national law or practice

human rights

rights inherent to all human beings, which include, at a minimum, the rights set out in the *United Nations (UN) International Bill of Human Rights* and the principles concerning fundamental rights set out in the *International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work*

Source: United Nations (UN), *Guiding Principles on Business and Human Rights: Implementing the 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 rights'.

impact

effect the organization has or could have on the economy, environment, and people, including on their human rights, which in turn can indicate its contribution (negative or positive) to sustainable development

Note 1: Impacts can be actual or potential, negative or positive, short-term or long-term, intended or unintended, and reversible or irreversible.

Note 2: See [section 2.1 in GRI 1: Foundation 2021](#) for more information on 'impact'.

material topics

377 topics that represent the organization's most significant impacts on the economy, environment, and
378 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 more information on 'material topics'.

379 **supplier**

380 entity upstream from the organization (i.e., in the organization's supply chain), which provides a
381 product or service that is used in the development of the organization's own products or services

Examples:

brokers, consultants, contractors, distributors, franchisees, home workers, independent
contractors, licensees, manufacturers, primary producers, sub-contractors, wholesalers

Note: A supplier can have a direct business relationship with the organization (often referred to
as a first-tier supplier) or an indirect business relationship.

383 **supply chain**

384 range of activities carried out by entities upstream from the organization, which provide products or
385 services that are used in the development of the organization's own products or services

386 **sustainable development / sustainability**

387 development that meets the needs of the present without compromising the ability of future
388 generations to meet their own needs

Source: World Commission on Environment and Development, *Our Common Future*, 1987

Note: The terms 'sustainability' and 'sustainable development' are used interchangeably in the
GRI Standards.

390 **value chain**

391 range of activities carried out by the organization, and by entities upstream and downstream from the
392 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., suppliers) provide products or services that
are used in the development of the organization's own products or services. Entities
downstream from the organization (e.g., distributors, customers) receive products or
services from the organization.

Note 2: The value chain includes the supply chain.

394 **worker**

395 person that performs work for the organization

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

Note: In the GRI Standards, in some cases, it is specified whether a particular subset of
workers is required to be used.

397

398 Bibliography

399 Authoritative instruments:

- 400 1. Organisation for Economic Co-operation and Development (OECD), *OECD Guidelines for*
401 *Multinational Enterprises on Responsible Business Conduct*, 2023.

402 Additional references

- 403 2. Organisation for Economic Co-operation and Development (OECD), *Glossary of Industrial*
404 *Organisation Economics and Competition Law*, 1993.

This document does not represent an official position of the GSSB