



Barbara Strozziiaan 336  
1083 HN Amsterdam  
The Netherlands  
[info@gssb.globalreporting.org](mailto:info@gssb.globalreporting.org)

## Transition to GRI Standards

### *Item 12 – Exposure draft of SRS 615: Public policy*

#### For GSSB approval

<b>Date</b>	22 March 2016
<b>Meeting</b>	5-7 April 2016
<b>Project</b>	Transition to GRI Standards
<b>Description</b>	As part of the move to become a standard setter, the Global Sustainability Standards Board (GSSB) has decided that the G4 Guidelines need to be transitioned to GRI Sustainability Reporting Standards. This paper presents an exposure draft of <i>SRS 615: Public policy</i> , for GSSB approval. Key changes are highlighted within comment boxes throughout this document. A summary of the key changes is provided in an <a href="#">Annex</a> .

This document has been prepared by the GRI Standards Division. It is provided as a convenience to observers at meetings of the Global Sustainability Standards Board (GSSB), to assist them in following the Board's discussion. 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](http://www.globalreporting.org).

1 **Sustainability Reporting Standard 615:**  
2 **Public policy 2016**

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## 17 Introduction

### 18 *A. Overview of the GRI Sustainability Reporting Standards*

19 The GRI Sustainability Reporting Standards (GRI Standards) are designed to be used by  
20 organizations to report about their impacts on the economy, the environment, and society.

21 The GRI Standards are structured as a set of interrelated standards. They are intended to be  
22 used together to help an organization prepare a sustainability report which is based on the  
23 Reporting Principles and focuses on material topics. This ensures that the organization provides  
24 a complete picture of its impacts in the report, and that the report includes contextual  
25 information to understand these impacts and how they are managed.

26 Organizations can also choose to use individual GRI Standards or their content to report on  
27 specific sustainability information.

28 **Figure 1 Overview of the set of GRI Standards**



29 The GRI Standards are divided into six series.

Series	Description
<b>100: Foundation</b>	<i>SRS 101: Foundation</i> is the starting point for using the set of GRI Standards. It is required to be complied with by any organization making a claim that its sustainability report has been prepared in accordance with the GRI Standards. <i>SRS 101</i> outlines the process to be followed in order to prepare a sustainability report using the GRI Standards. It also sets out the Reporting Principles for defining report content and quality, and specifies the different claims that an organization can make about its use of the GRI Standards.
<b>200: General disclosures</b>	<i>SRS 201: General disclosures</i> is used to report contextual information about an organization and its sustainability reporting practices. This includes information about an organization's profile, strategy, ethics and integrity, governance, stakeholder engagement practices, and reporting process.
<b>300: Management approach</b>	<i>SRS 301: Management approach</i> is used to report information about how an organization manages its material topics. This Standard is designed to be used together with each material topic, including those covered by the topic-specific Standards (series 400, 500, and 600), as well as other material topics identified by an organization. Applying <i>SRS 301</i> with each material topic allows an organization to provide a narrative description about how it manages the material topics and related impacts; this is in addition to reporting topic-specific disclosures.
<b>400, 500, and 600: topic-specific Standards</b>	The 400, 500, and 600 series are topic-specific Standards, which are used to report information on economic, environmental, and social topics (e.g., 'Water' or 'Indirect economic impacts'). An organization applies the Reporting Principles for defining report content from <i>SRS 101: Foundation</i> to identify its material economic, environmental, and social topics. These material topics form the basis for the sustainability report and determine which of the topic-specific Standards will need to be used.

## 30 *B. Responsibility for this Standard*

31 This Standard is issued by the Global Sustainability Standards Board (GSSB). It is part of the set  
32 of GRI Sustainability Reporting Standards (GRI Standards). The GSSB is an independent  
33 standard-setting body created by GRI. It has responsibility for setting globally-accepted  
34 sustainability reporting standards, according to a due process. More information on GRI's  
35 standard-setting process can be found here:

36 <https://www.globalreporting.org/information/about-gri/governance-bodies/Global-Sustainability-Standard-Board/Pages/default.aspx>  
37

38 Any feedback or comments on the GRI Standards can be submitted to  
39 [standards@globalreporting.org](mailto:standards@globalreporting.org) for the consideration of the GSSB.

## 40 *C. Scope*

41 *SRS 615: Public policy* sets out reporting requirements on the topic of public policy, including  
42 political contributions. It is part of the series of GRI Standards designed to elicit information  
43 about specific social topics.

44 This Standard applies to any reporting organization that has identified Public policy as a material  
45 topic, and wishes to report on its impacts related to this topic.

46 SRS 615 can be used by an organization of any size, type, sector, or geographic location.

## 47 *D. Using this Standard*

### 48 Requirements, recommendations, and guidance

49 Throughout the GRI Standards, specific terms are used to signify requirements,  
50 recommendations, and guidance.

- 51 • **Requirements:** These are mandatory instructions and are denoted using '**shall**.' These  
52 can include process or methodology requirements, as well as disclosure requirements  
53 (i.e., information to be reported).
- 54 • **Recommendations:** These are cases where a particular course of action is  
55 encouraged or recommended, but not required. They are denoted using '**should**.'
- 56 • **Guidance:** These sections include background context and examples to help  
57 organizations better understand the requirements. They also describe possible,  
58 achievable, or allowed scenarios for reporting information; these are signified using  
59 '**can**'. A different background color denotes 'Guidance' sections throughout the GRI  
60 Standards. Guidance is not required, but organizations are encouraged to consult the  
61 'Guidance' sections whenever it is useful.

62 A reporting organization needs to comply with all relevant requirements in order to claim that  
63 its report has been prepared in accordance with the GRI Standards. See Table 2 of SRS 101:  
64 *Foundation* for more information. It is not necessary to comply with recommendations or  
65 guidance in order to make an 'in accordance' claim.

## 66 *E. Normative references*

67 The documents below are normatively referenced in this Standard and are required to be used  
68 together for its application. For documents with a date given, only the listed version applies. For  
69 undated references, the latest version of the document applies.

- 70 *SRS 101: Foundation*
- 71 *SRS 301: Management approach*
- 72 *GRI Standards Glossary of terms*

## 73 *F. Effective date*

74 SRS 615: Public policy becomes effective for all reports published on or after 1 January 2018.  
75 Earlier adoption of this Standard is encouraged.

76 **G. Background context**

77 In the context of the GRI Standards, the social dimension of sustainability concerns an  
78 organization's impacts on the social systems within which it operates.

79 SRS 615 addresses the topic of public policy. This includes an organization's participation in the  
80 development of public policy, and activities such as lobbying, and making financial or in-kind  
81 contributions to political parties, politicians, or causes.

82 While an organization can positively support the public political process and encourage the  
83 development of public policy that benefits society at large, this can also bring risks associated  
84 with corruption, bribery, and undue influence, among others. Organizations need to ensure such  
85 behavior is avoided, and that any public policy positions are in line with their stated policies,  
86 sustainability goals, or other public positions.

**Commented [SD1]:**  
**Type of change:** Clarification [Clarifying topic descriptions]

Source:  
G4 RPSD p. 64; G4 IM pp. 142, 209

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## 87 SRS 615: Public policy

### 88 1. Management approach disclosures

#### 89 Reporting requirements

90 1.1 The reporting organization shall report its management approach for public policy as  
91 specified in *SRS 301: Management approach*.

#### 92 **Guidance 1.1**

93 Reporting on the management approach, as well as completing topic-specific disclosures for all material  
94 topics, is required for any organization that wishes to make a claim of being in accordance with the GRI  
95 Standards. The management approach is a narrative explanation of how an organization manages the topic,  
96 associated impacts, and stakeholders' reasonable expectations and interests.

97 This Standard is therefore designed to be used together with *SRS 301: Management approach* in order to  
98 provide a full disclosure of an organization's impacts for a given topic. SRS 301 specifies how to report on  
99 an organization's management approach and what information to include.

#### 100 Reporting recommendations

101 1.2 The reporting organization should **report**:

102 1.2.1 the lobbying and public policy issues that have the focus of the organization; and

103 1.2.2 its stance on these issues, and any differences between its lobbying positions and  
104 any stated policies, sustainability goals, or other public positions.

#### Commented [SD2]:

**Type of change:** Clarification

Guidance added to explain the new structure.

#### Commented [SD3]:

**Type of change:** Change in instructive verb

#### Original wording:

**Describe** the significant issues that are the focus of the organization's participation in public policy development and lobbying.

**Provide** the organization's core position for each of the identified issues, and **describe** any significant differences between lobbying positions and stated policies, sustainability goals, or other public positions.

Source: G4 IM p. 209

105 **2. Topic-specific disclosures**

106 **Political contributions**

107 **Guidance**

108 The purpose of this disclosure is to identify the reporting organization’s support for political causes.

109 Direct or indirect contributions to political causes can present corruption risks, because they can be used  
 110 to exert undue influence on the political process. Many countries have legislation that limits the amount an  
 111 organization can spend on political parties and candidates for campaigning purposes. If an organization  
 112 channels contributions indirectly through intermediaries, such as lobbyists or organizations linked to  
 113 political causes, it can improperly circumvent such legislation.

114 **Reporting requirements**

115 2.1 The reporting organization shall report the following information for **Disclosure 615-1**:

Disclosure 615-1	
a.	Total monetary value of financial and in-kind political contributions made directly and indirectly by the reporting organization, with a breakdown by country and recipient/beneficiary.
b.	If applicable, how the monetary value of in-kind contributions was estimated.

116 2.2 The reporting organization shall **calculate** financial political contributions in compliance  
 117 with national accounting rules, where these exist.

**Commented [SD4]:** Source: G4 IM p. 210

**Commented [SD5]:** Source: G4 IM p. 210

**Commented [SD6]:**  
**Type of change:** Change in instructive verb  
  
**Original wording:**  
**Calculate** financial political contributions in accordance with national accounting rules (where these exist).  
  
 Source: G4 IM p. 210

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118

## References

Commented [SD7]: Source: G4 IM pp. 237-242

119 The following documents informed the development of this Standard. It is recommended that  
120 the reporting organization be familiar with these documents, as they can improve understanding  
121 of this Standard.

- 122 1. Organisation for Economic Co-operation and Development (OECD) Principles,  
123 'Principles of Corporate Governance', 2004.
- 124 2. Organisation for Economic Co-operation and Development (OECD) Recommendation,  
125 'Recommendation of the Council on Principles for Transparency and Integrity in  
126 Lobbying', 2010.

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## 127 Annex I. Summary of key changes for SRS 615: Public policy

128 This section summarizes changes made to this GRI Standard compared to the G4 Guidelines. These can include the following types:

- 129 • Change in location
- 130 • Clarification – changes or additions to text to improve clarity
- 131 • Employee/worker terminology revision
- 132 • Changes to instructive verbs – to clarify the intent of guidance text that comes from the G4 Implementation Manual
- 133 • Deleted text – the text is duplicated, unnecessary or obsolete
- 134 • Other

135  
136 Each of these changes is listed in the tables below and highlighted within comment boxes throughout this Standard.

137 A number of structural and other minor changes have been applied globally throughout the GRI Standards. These include new Introduction sections or  
138 minor wording changes to the disclosure requirements. These changes are explained in greater detail in the following document [reference to be provided];  
139 they are not listed in this summary of changes. This document [reference to be provided] also provides rationales for those clarifications that have been  
140 applied globally throughout the GRI Standards (e.g., clarifying the definition of Boundary, clarifying topic descriptions).

### 141 Legend

142 The source of original G4 text is:

143 G4 RPSD = [G4 Guidelines – Reporting Principles and Standard Disclosures](#)

144 G4 IM = [G4 Guidelines – Implementation Manual](#)

<b>Changes in location, clarifications, employee/worker terminology, and other</b>				
<i>SRS clause number</i>	<i>SRS section</i>	<i>Type of change</i>	<i>Description or rationale</i>	<i>Source of original G4 text</i>
N/A	Introduction G	Clarification	Clarifying topic descriptions.	G4 RPSD p. 64 G4 IM pp. 142, 209
Guidance I.1	Management approach disclosures	Clarification	Guidance added to explain the new structure.	N/A

<b>Changes to instructive verbs</b>				
To clarify the intent of guidance text that comes from the G4 Implementation Manual				
<i>SRS clause number</i>	<i>SRS section</i>	<i>SRS wording</i>	<i>Original G4 text</i>	<i>Source of original G4 text</i>
1.2	Management approach disclosures	The reporting organization should also report:  the lobbying and public policy issues that have the focus of the organization; and  its stance on these issues, and any differences between its lobbying positions and any stated policies, sustainability goals, or other public positions.	<b>Describe</b> the significant issues that are the focus of the organization's participation in public policy development and lobbying.  <b>Provide</b> the organization's core position for each of the identified issues, and <b>describe</b> any significant differences between lobbying positions and stated policies, sustainability goals, or other public positions.	G4 IM p. 209
2.2.1	Political contributions	The reporting organization shall:  calculate financial political contributions in compliance with national accounting rules (where these exist)	<b>Calculate</b> financial political contributions in accordance with national accounting rules (where these exist).	G4 IM p. 210

<b>Deleted text</b>	
<b>Deleted text</b>	<b>Source of original G4 text</b>
<p><i>[The following text from the G4 Implementation Manual has been deleted because it duplicates Disclosure 615-1-a]</i></p> <p>Identify in which countries and to which political parties, politicians or causes financial and in-kind political contributions have been made directly or indirectly by the organization.</p>	G4 IM p. 210
<p><i>[The following text from the G4 Implementation Manual has been deleted because it duplicates Disclosure 615-1-a]</i></p> <p>The value of in-kind political contributions is to be estimated.</p>	G4 IM p. 210

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