

Workforce Disclosure in 2021: Trends and Insights



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Join the WDI investor signatories

Since its establishment in 2016, the WDI has worked with institutional investors to improve corporate workforce transparency. Investor support has been vital in generating new workforce data, encouraging wider engagement with companies, and promoting a greater understanding of the workforce topics covered in the annual WDI survey.

Investors are increasingly realising the benefits of the WDI and contributing to its growth:



+25% investor signatories

The number of investor signatories increased by 25 per cent over the past year to a total of 65 institutions.



+62% investor engagment

Investor engagement with companies increased by 62 per cent, showing that more investment teams are becoming advocates of the WDI.



2X more likely to complete

With investor engagement, companies were twice as likely to complete the WDI survey in 2021.

Benefits of WDI membership

In return for a modest membership fee that is tiered according to the value of investors' assets, investor signatories receive full access to all workforce data submitted by companies, company disclosure scorecards and opportunities for engagement with companies on WDI data and workforce practices. Signatories also receive access to:

- exclusive resources;
- exclusive events;
- and the latest WDI research on workforce topics

All of this allows investors to make the most of the WDI's unique dataset



To support the WDI's work or to find out more about the benefits of membership please contact james.coldwell@shareaction.org.

There are currently 65 WDI investor signatories



































































































































Introduction to the WDI





Naïm Abou-Jaoudé CEO, Candriam

Foreword

Ask most CEOs what their firm's greatest asset is and they will tell you it's their employees. A company's workforce is where a business gets its main source of ideas and innovation. It creates and embeds a firm's corporate culture and identity, and drives resilience, growth, and performance.

However, despite the consensus around the importance of employees to the success of a business, there remains a substantial lack of corporate transparency on workforce data. Unlike reporting on the environment, companies have not shown the same level of willingness to act, effectively measure, and regularly report on their various workforce dynamics.

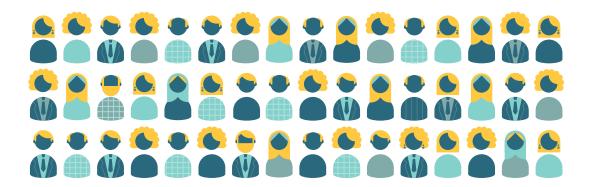
Clearly, all companies face challenges with their workforce, and every company is different. Gender pay gaps at all levels of a business exist. Diversity issues exist. Supply chains are complicated and can be global. Investors are fully aware it is unlikely many companies are getting everything right with the structure of their workforce. They understand there are complexities and unique issues to navigate. But, it is the desire of management teams to show willingness, and to make changes and improvements that will benefit a company – and indeed society – over the long term that matters most to shareholders.

Change and progress on these issues can only happen, however, if critical workforce data and information is made available to ensure policies and practices are aligned with international standards. As investors and shareholders, we want to support management teams in creating high performing companies, but also companies that are strong and resilient, and properly equipped to make a positive and sustainable impact on society as a whole.

It is for this reason that Candriam, and many other active asset managers that focus on sustainable and responsible investment, is an advocate of the WDI's annual survey. This is an exercise in bringing together investors and companies so we can enter into better informed and even more constructive dialogue to ensure workforce practices are collectively supportive for both the company and its most important stakeholders – its people.

Why safeguarding workforces is important

Effect on workers



In the wake of the COVID-19 pandemic, the vital role that workers around the world play in ensuring society can function is clearer than ever.

Many companies and their boards have responded to this. From introducing more flexible working, to better health and safety practices, to more robust supply chains, numerous organisations are recognising the value of their workers by improving practices and creating more equitable organisations. These changes allow workers to thrive.

However, for far too many workers, the experience of the pandemic has resulted in worse pay, worse conditions, and greater insecurity.¹ Sexual harassment and discrimination, payment of poverty wages and irresponsible sourcing practices have all persisted in organisations across the global economy, despite numerous pledges to 'build back better'. The consequences of this for the workforce are exacerbated by rising inequality and rocketing inflation in many countries around the world.

Effect on companies

Workers aren't alone in facing the harms of low-quality jobs. Companies that don't take steps to safeguard and support their workforce miss out on the benefits that responsible workforce practices bring:²

- improved worker engagement
- skill retention

productivity

overall competitiveness

Investors face greater risk exposure when their investee companies fail to recognise that their workforces are their greatest asset.

The ramifications of widespread inequality on growth and productivity create an economic context in which all stakeholders, from businesses to financial markets to workers alike, face real challenges.

Companies should identify, communicate and act upon these issues. Doing so will mean the ambitions to emerge from the pandemic as a fairer, more resilient, thriving society will become a reality.

Why the Workforce Disclosure Initiative is important

Corporate reporting initiatives fail to generate meaningful and comparable data on workforce issues at scale. The WDI was launched to rectify this through its rigorous and comprehensive survey of companies' workforce practices on a broad range of key issues.

Investors need a comprehensive picture of how companies are addressing decent work and human rights in the workplace. To achieve this, the WDI's disclosure framework goes beyond the traditional scope of risks to business and has a wider scope that includes the impacts organisations have on their workforce.



By generating a large volume of high-quality data on companies' workforces, the WDI enables its investor signatories to drive improvements in corporate workforce policies and practices.

Investors have access to company data across 13 sections of the survey, covering topics such as wage levels, health and safety, workers' rights and training and development. Investor engagement and company participation in the WDI survey promotes better workforce practices in companies' direct operations and supply chains, benefitting workers and leading to better outcomes for companies and investors.



The WDI is the most comprehensive workforce disclosure framework in the world today.

The survey promotes more ambitious disclosure standards for companies around the world. It is continuously updated to encourage greater company disclosure around emerging and challenging areas of workforce practices.



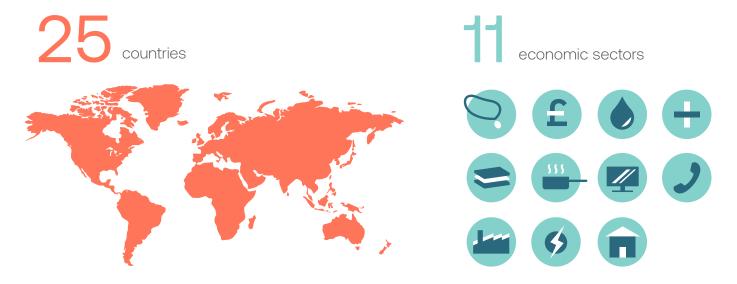
Workforce Disclosure Initiative 2021 overview



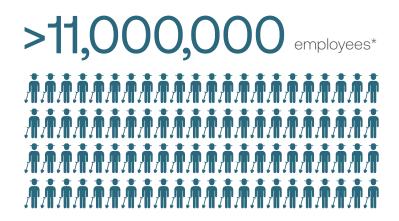
In 2021:



Submissions came from:



...and covered:



\$13 trillion

US dollars in combined market capitalisation





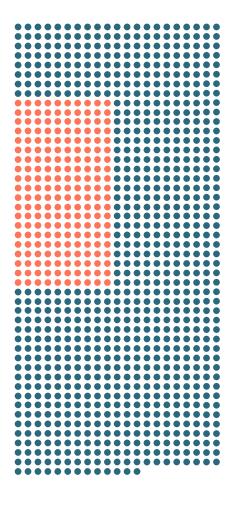
Company recruitment

Company selection

- In 2021, WDI investor signatories requested that 1,000 of the largest publicly listed companies from around the world take part in the WDI reporting cycle, an increase of 35 per cent from last year.
- Of those 1,000, the WDI team selected 408 'core' companies to receive tailored and focused engagement.

Company selection was based on a combination of:

- Market capitalisation
- Significance of the company (in terms of sector, local market and scale)
- As well as those of specific interest to the WDI investor group



Company engagement

With the addition of investor engagement, 575 companies had direct contact with the WDI in 2021.



Consumer Discretionary was the 'most engaged' sector for the second year in a row, with the number of investor engagements increasing by 68 per cent.



U.S companies were again the 'most engaged', with the number of investor engagements increasing by 29 per cent.

Workforce data in an evolving landscape

Sustainable development goals and the WDI

If we are to meet the ambitious agenda set by the Sustainable Development Goals by 2030, innovative collaboration within the private sector must grow.

It is only by harnessing the power of the investment community and corporations that we will tackle some of the most challenging problems the world faces today.

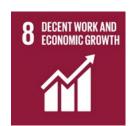
While the WDI's focus is on Goal 8 and how we "promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all", the reality is that good work also supports ending poverty (Goal 1), gender equality (Goal 5), industry, innovation and infrastructure (Goal 9), reduced inequalities (Goal 10) and peace, justice and strong institutions (Goal 16).



















Environmental, social and governance principles and the WDI

Recognition within the investment system of the importance of integrating environmental, social and governance (ESG) factors into investment analysis and stewardship is growing year on year. The value of ESG data is growing too, with total global assets operating on ESG issues expected to double in the next five years.⁵ As a result, the risks associated with poor workforce management, which falls under both the 'social' and 'governance' aspects of ESG, can no longer be ignored by the investment community or companies themselves.

WDI investor signatories are increasingly aware of the damage poor workforce management can have on company performance and the COVID-19 pandemic has served to focus attention on companies' workforce practices. However, while the 'S' of ESG is gaining growing recognition, this increased momentum must continue if we are to address the pressing challenges we face. Similarly, some companies are aware of the role workers play in contributing to their value, but improvements to policies and practices lag behind.

Emerging standards and mandatory reporting

As the focus on sustainability grows, the value of internationally recognised reporting standards is increasingly clear. If formulated effectively, global standards could help to drive progress towards a financial system that better addresses the critical environmental and social challenges the world faces. Progress is being made towards making this a reality through both the European Union's Corporate Sustainability Reporting Directive (CSRD) and the IFRS Foundation's International Sustainability Standards Board.

The WDI has a key role to play in driving rigorous mandatory standards and has already supported the international standards development process.

This includes participation in the European Financial Reporting Advisory Group's Project Taskforce, helping to develop the technical reporting standards for the CSRD. The WDI also regularly engages with other reporting frameworks and standard setters. This ensures that other initiatives provide investors and other stakeholders with the information they need to understand how companies are treating their workers, and to drive improvements in corporate practice.

This report sets out a summary of the findings from the 2021 WDI reporting cycle, including:

- trends in company reporting by sector and geography;
- the average level of the survey that was completed;
- and insights from the different sections of the survey.

Six thematic findings were identified, covering reporting and good practice, governance and worker engagement, human rights, diversity and inclusion, inequality, and supply chain transparency.

Number of responding companies

2021

173 participating companies

2020

141 participating companies

2019

118 participating companies

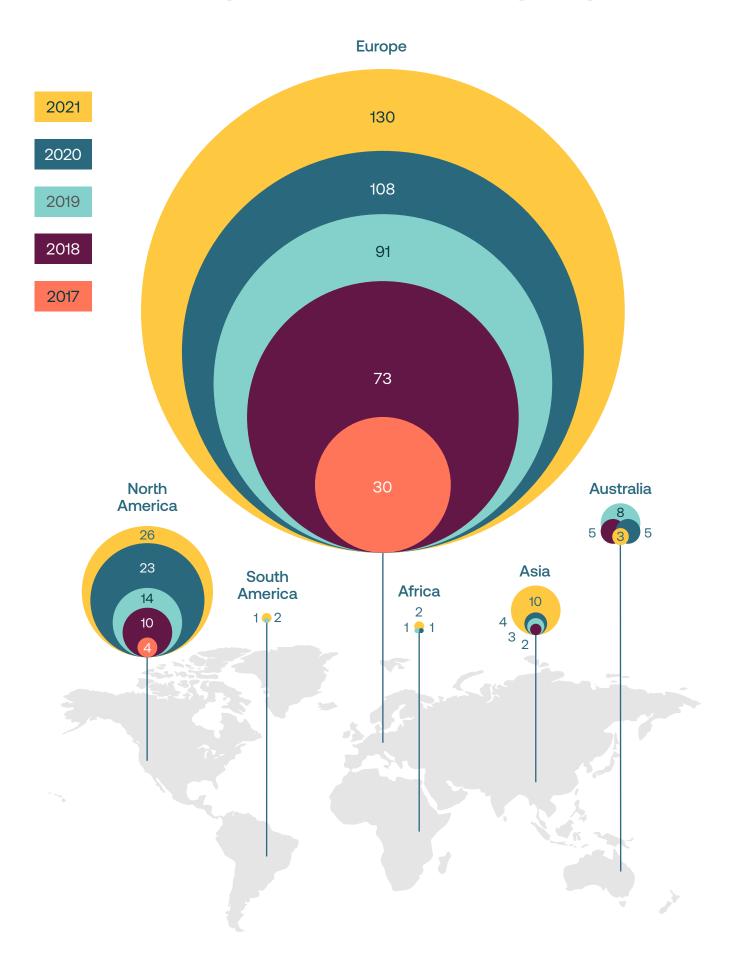
2018

90 participating companies

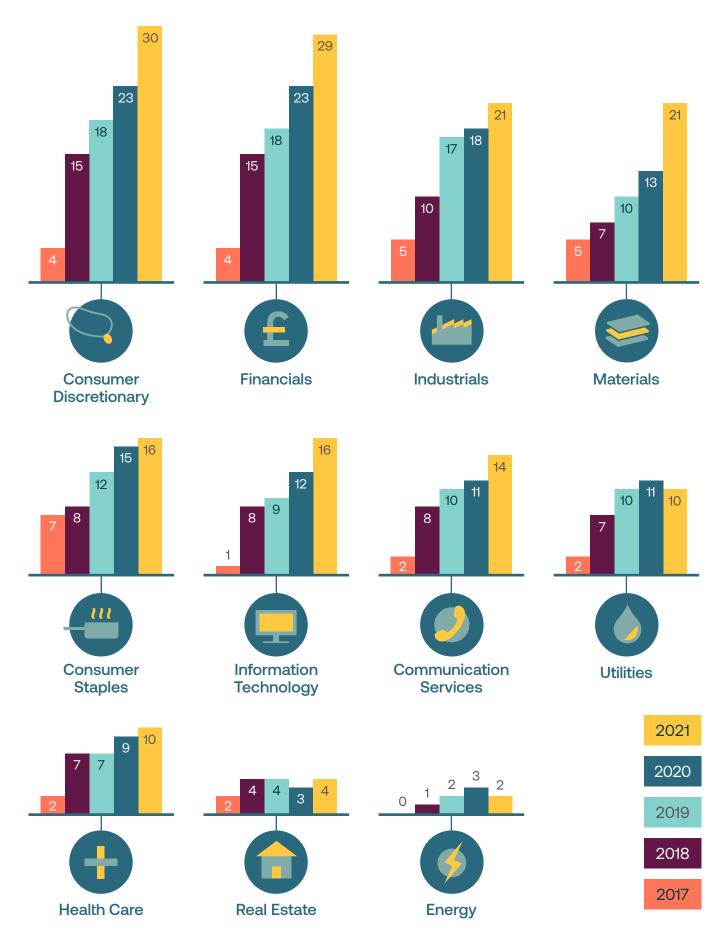
2017

34 participating companies

Responding companies by geography



Responding companies by sector



Making more workforce data available







The WDI survey includes:

135
questions

240 data points

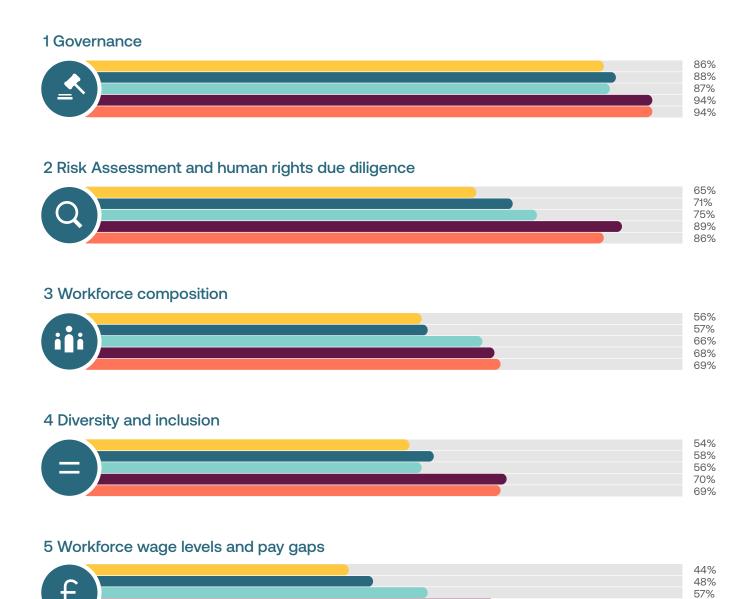
across 13 thematic sections

The survey is designed to challenge companies' workforce data collection. As a result, only 65 per cent of the total survey was completed in 2021 on average. Participation in the survey helps companies to think about the data they collect, how they manage their workforce and how this could be improved in the future. In 2021, new questions were added on prison labour, workforce surveillance and diversity and inclusion.

68%

The longer companies take part in the WDI survey, the more of it they complete



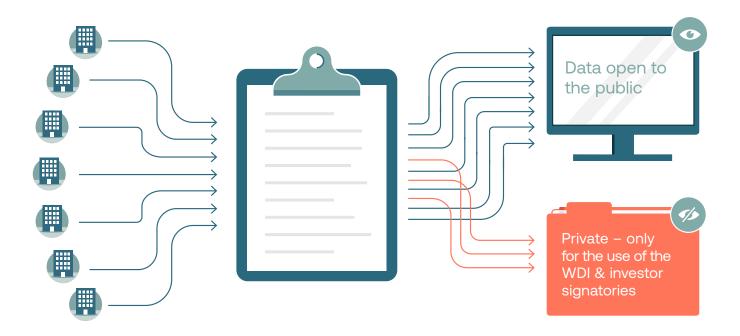


89%

6 Stability 54% 62% 60% 58% 7 Training and development 55% 71% 72% 81% 76% 8 Health, safety and wellbeing 51% 58% 59% 67% 72% 9 Worker voice and representation 61% 64% 72% 87% 81% 10 Grievance mechanisms 58% 63% 71% 83% 85% 11 Supply chain transparency 37% 44% 48% 59% 67% 12 Responsible sourcing 74% 82% 77% 91% 94% 13 Supply chain working conditions 55% 64% 61% 83%

Publishing WDI data

Companies are encouraged to make as much data submitted through the WDI survey available to the public as possible to demonstrate their openness on these issues and so that companies can learn from each other on workforce reporting and management. This can, however, act as a barrier to participation, because some organisations are nervous about putting this information into the public domain. To mitigate this, over the last five years, companies have had the option to share some data publicly or to investor signatories only.



T

Mandatory public data

The WDI asks 54 questions where the responses are made available to the public by default through the WDI website. Companies can, however, choose to make more data available publicly. In 2021, 65 per cent of companies' responses were submitted under the "public" option. With each year, the WDI increases the number of mandatory public questions to ensure the quantity of publicly available, comparable workforce data increases.

Private data

For all questions which aren't marked as "mandatory public", companies have the choice whether they submit their answer publicly or to the signatory investors only. Data submitted in this way is only available to WDI investor signatories to help target their engagement activities on workforce issues with companies they currently invest in or may invest in in the future. The full dataset is also used by the WDI team in its analysis, reports, and research.





To demonstrate the WDI's commitment to publicly reported workforce data in 2021, we compared how much information was available in the public domain between responding and non-responding companies. Using companies' annual reports, sustainability reports, public policies and 401K disclosures, the WDI survey was completed for a group of 169 non-responding companies. By comparing how complete each section of the survey was for these 169 to the 173 responders, we were able to determine how much more information participating companies were publishing through the WDI than is traditionally made available.

This research revealed that companies who complete the WDI survey are making two and a half times as much data available than those who do not complete the survey.

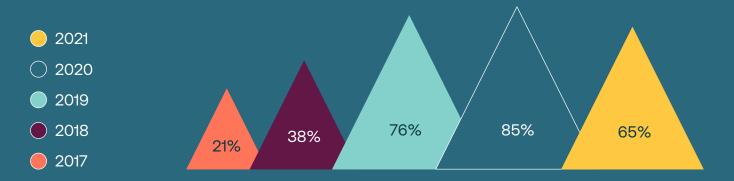
The COVID-19 pandemic impacted how much data companies made publicly available

In 2021, more companies provided more data to the WDI than ever before. However, it appears that the onset of the COVID-19 pandemic in 2020 (the year that this year's survey data refers to) led to companies choosing to make a lower proportion of data publicly available.

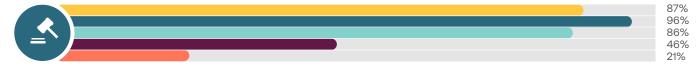
The disruption caused by the pandemic created significant challenges for workforce management. It therefore seems that as a result, companies were less willing to publicly disclose data that may show negative outcomes for workers.



Percentage of WDI survey data made public⁷



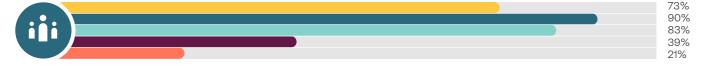
1 Governance



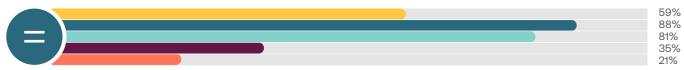
2 Risk Assessment and human rights due diligence



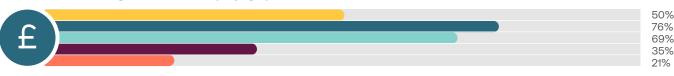
3 Workforce composition



4 Diversity and inclusion



5 Workforce wage levels and pay gaps



6 Stability 55% 83% 64% 37% 21% 7 Training and development 61% 81% 74% 31% 21% 8 Health, safety and wellbeing 68% 91% 82% 49% 21% 9 Worker voice and representation 67% 85% 75% 36% 21% 10 Grievance mechanisms 64% 73% 67% 36% 21% 11 Supply chain transparency 50% 80% 69% 29% 21% 12 Responsible sourcing 71% 91% 88% 40% 21% 13 Supply chain working conditions8 55% 77% 67%

Insights from the WDI



On average, European companies provided the most workforce data⁹

	Italy - 4 companies		80%
i ů l	Spain - 6 companies		76%
	Netherlands - 5 companies		75%
	United Kingdom - 66 compani	es	72%
	France - 20 companies		72%
	Germany - 12 companies	62%	,
* *	Australia - 3 companies	60%	
+	Switzerland - 5 companies	58%	
*	Canada - 7 companies	57%	
	Japan - 4 companies	52%	
+	Sweden - 4 companies	48%	
	USA - 19 companies	47%	
	Belgium - 3 companies	43%	

Energy, utilities, and real estate companies are leading the way in workforce transparency

Energy – 2 companies	85%
Real Estate – 4 companies	77%
Utilities - 10 companies	77%
Consumer Staples – 16 companies	72%
Health Care - 10 companies	70%
Financials - 29 companies	67%
Consumer Discretionary – 30 companies	65%
Communication Services – 14 companies	64%
Industrials – 21 companies	59%
Materials - 21 companies	59%
Information Technology - 16 companies	59%

Top workforce opportunities and human rights issues reported by companies in 2021

Top workforce opportunities



Top workforce risks



Findings from WDI 2021 data

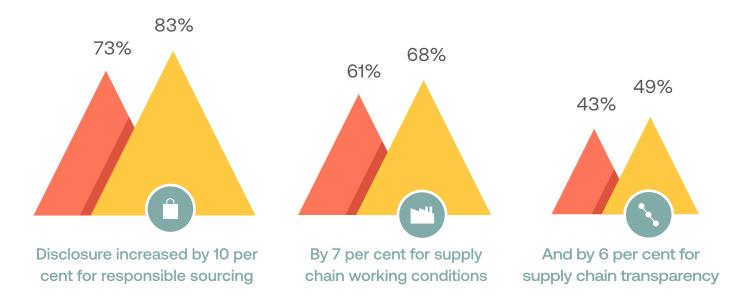


Thematic findings: Improvements

Increased disclosure scores

The ramifications of the pandemic are still being felt by companies across the world. Yet many organisations have demonstrated their commitment to greater transparency by reporting to WDI, and even increasing the levels of data they provide. This was especially noticeable in the provision of supply chain data.



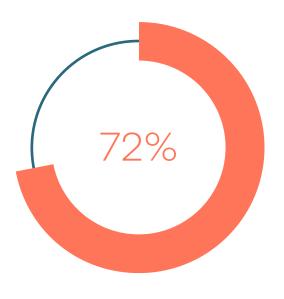


These sections have previously received some of the lowest levels of disclosure, making these improvements even more notable.

Core indicators

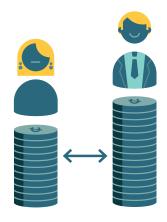
Another encouraging development this year was the extent to which companies are providing the most crucial workforce data points. Analysis of the WDI's core indicators revealed that companies answered, on average, 72 per cent of these questions.

The core indicators capture the fundamental data companies need to be able to understand and improve the conditions of their workforce, highlighting the progress being made where disclosure is most pressing.



Thematic findings: Areas for improvement

Progress at a standstill



Despite the improvements, there is still a long way to go. For many topics in the survey, progress is at a standstill. There was no change in the average levels of data provided on training and development or workforce wage levels and pay gaps, and disclosure on governance decreased. The global economy faces the greatest levels of uncertainty for many years. Transparency on how workers are paid and their talents developed, and how corporate leadership is responding to these challenges, is more important than ever.

The findings of the 2021 survey highlighted just how valuable workforce transparency is

Across many topics in the survey, more workforce data was consistently linked to better workforce practices and outcomes for workers. This applied to the maturity of workforce reporting. Companies that had been taking part in the WDI for longer employed practices linked to better workforce management. It was also demonstrated when looking at diversity and inclusion. Companies that had a deeper understanding of how diverse their organisations are were more likely to exhibit more inclusive practices. The role of data in improving practices also extended to the supply chain. Companies that had more information on the structure of their supply chain were better placed to respond to supply chain workers' needs.



Overview of findings

The following findings are based on companies' responses to the WDI survey. While they provide an invaluable insight into these organisations' approaches to managing their workforce, they aren't necessarily representative of the practices of all companies, beyond those that took part in the survey.

1

Companies that engage in workforce reporting for longer demonstrate better workforce practices.

2

Many companies take a top-down approach to workforce management, failing to match disclosure with worker engagement.

3

Companies are more able to effectively identify risks to human rights than they are to take steps to address them.

4

Organisations with a better understanding and implementation of diversity were also more inclusive.

5

Despite the risks that inequality poses to companies and their workforces, businesses lack the basic data needed to tackle it. 6

When companies understand their supply chain, conditions for workers are more likely to be improved.

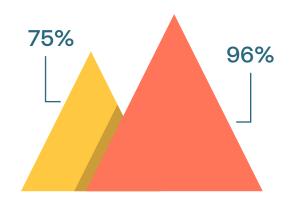
Finding 1

Companies that engage in workforce reporting for longer demonstrate better workforce practices

Companies are increasingly expected to provide comprehensive sustainability data and widespread mandatory ESG reporting is becoming a reality. Effective reporting provides investors with the information they need to understand how a company is treating its workforce and the associated impacts this has on company performance. It also gives companies the tools to create happier, more productive, and fairer workplaces.

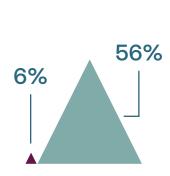
Greater transparency is essential for corporate accountability. However, calls for more information are often accompanied by questions around whether gathering this data drives changes in companies' practices. Data from the 2021 survey showed that not only does consistent responding to the WDI lead to higher levels of disclosure; it also appears to be correlated with improved workforce practices.

The longer companies respond to the WDI survey, the more likely they are to conduct human rights due diligence.

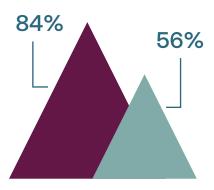


75 per cent of first-time responders conduct human rights due diligence, compared to 96 per cent of fifth-time responders. Due diligence is essential for effectively identifying and responding to risk.

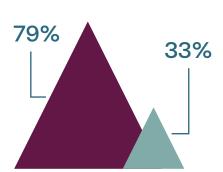
In 2021, responding companies that conduct due diligence are:



Significantly less likely to use prison labour.



More likely to explain how they monitor supplier human rights performance against their supplier code of conduct.

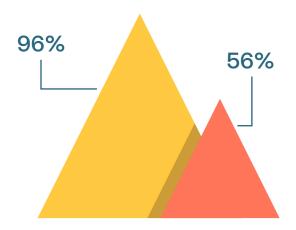


Much more likely to explain how they are improving conditions for workers in the supply chain.

Workforce disclosure correlates with an increased ability to identify risk

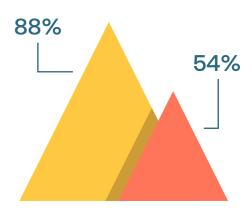
Fifth-time responders

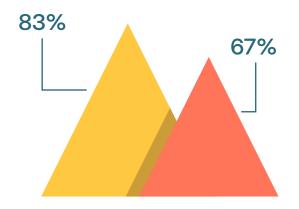
First-time responders



96 per cent of companies who have taken part in the WDI survey for five years explained the products, services, and raw materials at particular risk of forced labour, modern slavery and human trafficking. This is compared to 56 per cent of first-time responders.

88 per cent of fifth-time responders explained the company's operating locations, business lines and workforce demographics where health and safety risks and injuries are reported to be higher. This is compared to 54 per cent of first-time responders.

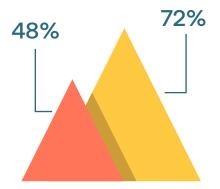




The more advanced risk identification linked to longer disclosure to the WDI is also correlated with the uptake of more effective human rights practices. Of the companies that conduct human rights due diligence, 83 per cent of fifth-time responders explained how they are taking action on at least one salient human rights issue, compared to 67 per cent of first-time responders.

Data from the 2021 survey suggests companies that have been responding to the WDI for a longer period may be more diverse, inclusive, and equal organisations

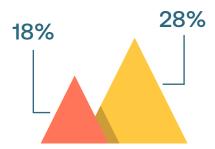
When companies have an accurate understanding of how inequalities are manifesting in the organisation, this can spur on more meaningful action. This was reflected in this year's data.



There was a link between taking part in the WDI for longer and both providing more data on gender and ethnicity pay gaps and having smaller pay gaps. 48 per cent of first-time responders provided their gender pay gap, with an average pay gap of 20.4 per cent. 72 per cent of fifth-time responders gave this data, with an average gender pay gap of 14.3 per cent.



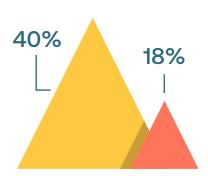
There was less of a difference in disclosure on ethnicity pay gaps, where 17 per cent of first-time responders provided this compared to 20 per cent of fifth-time responders.



However, fifth-time responders' ethnicity pay gaps were significantly lower at 18 per cent, compared to an average pay gap of 28 per cent for first-time responders.

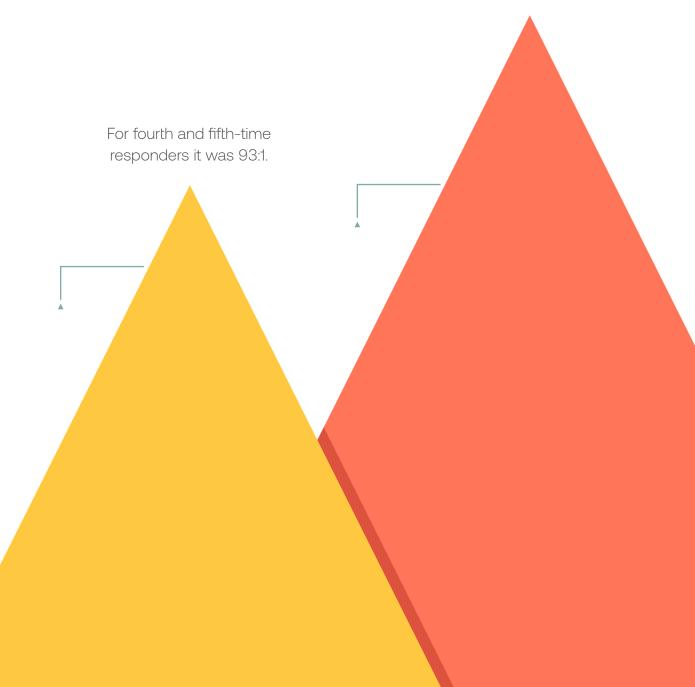
A similar pattern can be seen when looking at pay fairness more broadly

More than double the proportion of fifth-time responders pay employees a living wage in more than one of their significant operating locations. 40 per cent of fifth-time responders did so, compared to 18 per cent of first-time responders.



The average CEO to median worker pay ratios:

For first and second-time responders it was 123:1



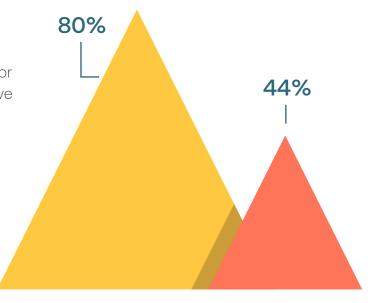
The improved practices associated with longerterm disclosure extended throughout companies' supply chains.

Collecting supply chain data can be particularly challenging due to complex, multitiered structures and the prevalence of suppliers in jurisdictions where labour rights protections are less advanced. The risk of some of the most severe violations of workers' rights is, however, often most pressing in supply chains. By rectifying the lack of data in this area, companies can identify risks more effectively in order to improve conditions for workers.



Twice the proportion of fifth-time responders reported identifying instances of forced labour, modern slavery, and human trafficking in their supply chains (16 per cent) than first-time responders (eight per cent). Low instances of modern slavery may initially seem positive. However, given the scale of these practices, not identifying modern slavery often reflects a failure to carry out effective due diligence, rather than better working conditions.

Companies that had taken part in the WDI for longer are also better at creating a supportive environment for tackling human rights risks in the supply chain. Nearly double the proportion of fifth-time responders monitor whether supply chain workers have access to a grievance mechanism (80 per cent) than first-time responders (44 per cent).



Finding 2

Many companies take a top-down approach, failing to match disclosure with worker engagement.

Building a productive, engaged workforce requires leadership from the highest levels of authority in a company. Effective governance should be supported by inclusive, comprehensive engagement with workers themselves. As well as supporting effective workforce management, worker engagement in the form of collective bargaining and freedom of association are fundamental human rights. Supporting them is an essential (and often legal) requirement for a responsible employer.

Effective governance is the cornerstone of improved workforce practices. If senior leadership and the board aren't engaged on workforce issues, bringing about positive change for workers will be challenging, if not impossible. Responding companies continued to recognise this.

Companies continue to do well when it comes to disclosure on governance.



This section had the highest average response rate of the WDI survey, at 89 per cent.

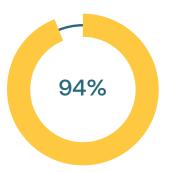


Some indicators had near-universal responses. For example, 98 per cent of companies explained which workforce topics are subject to board-level oversight.

There's also evidence that companies are widely implementing key governance practices, particularly policies.



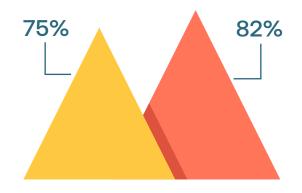
89 per cent of responding companies reported having a commitment to respect internationally recognised human rights.



94 per cent had a commitment to prohibiting, identifying, and preventing forced labour, modern slavery and human trafficking in their direct operations and supply chain.

Despite these achievements, companies' governance practices are far from perfect. WDI data shows some significant gaps when it comes to worker engagement.

Understanding how senior management address workforce issues is necessary, but not sufficient. Senior leadership has a distinct perspective that often doesn't reflect the reality of workers' everyday experiences throughout the organisation. Direct input from workers is, therefore, essential for good governance. However, data from the survey showed that many companies are failing to properly involve workers in decision-making.



A smaller proportion of companies reported board oversight of worker engagement this year (75 per cent) than in 2020 (82 per cent).

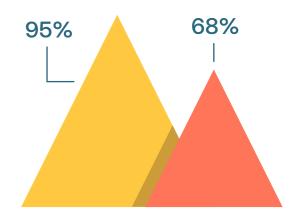
31%

66%

31 per cent of companies didn't explain how consultations with workers and/or representative bodies, including trade unions, helped the company identify its salient human rights issues.

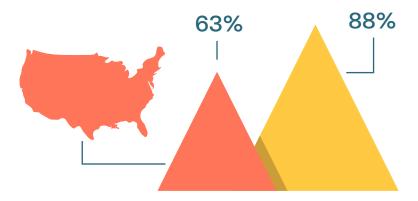
Two thirds of companies that reported using some form of workforce surveillance didn't explain how workers are involved in the design and implementation of these measures.

While 95 per cent of companies explained the process for obtaining workers' feedback, this drops to 68 per cent when asked to provide an example of how workers have influenced decision-making. This suggests that either companies aren't tracking the outcome of actions on worker input or aren't using these mechanisms to enable workers to have a genuine influence on company practice.





US companies provide very little information on worker voice and engagement.



US companies provided the least data on the company's process for consulting with workers on health and safety policies (63 per cent compared to an average of 88 per cent for all other countries).

They also had one of the lowest average levels of collective bargaining agreement coverage (19 per cent compared to 59 per cent for companies from all other countries).

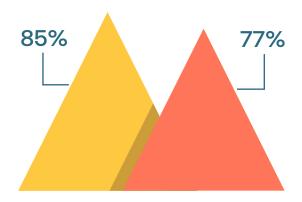
North American companies were the least likely to explain how consultations with workers and/or representative bodies helped the company identify salient human rights issues.

Finding 3

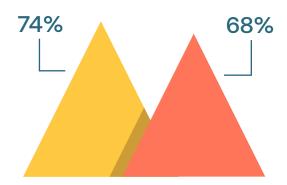
Companies are more able to effectively identify risks to human rights than they are to take steps to address them.

Under the UN Guiding Principles on Business and Human Rights and increasing national legislation, companies have a responsibility to respect human rights. The first step in doing this is identifying human rights risk. However, this information is of little value unless companies then use it to take meaningful action to address human rights impacts.

Companies' ability to identify human rights risks is improving.

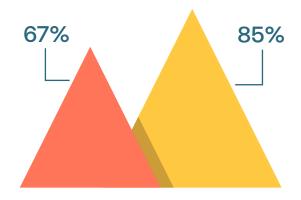


In 2021, 85 per cent of responding companies identified at least one salient human rights issue, compared to 77 per cent in 2020.



Similarly, 74 per cent of companies explained whether the company has identified any instances of forced labour, modern slavery, and human trafficking, up from 68 per cent in 2020.

Companies can also talk about processes to address risks. However, there are important gaps when it comes to data on specific instances of remedy.



Companies are increasingly providing data on how they're tackling salient human rights issues. 67 per cent of companies provided this data in 2020, increasing to 85 per cent in 2021. Virtually all companies provided details of the channel/mechanism that employees can use to raise complaints or concerns (98 per cent).

Nonetheless, when looking at more specific instances of remedy, gaps appear. Just 47 per cent of companies provided the number of grievances reported and only 36 per cent provide the number of grievances resolved. Similarly, over a third of companies (40 per cent) didn't provide any data on how they have provided or contributed to a remedy for a human rights grievance raised in the reporting period.

Information on risks is most useful when it's used to identify and respond to actual instances of poor treatment and rights abuses of workers. Failing to collect data on remedy prevents organisations from tracking where risks are manifesting into concrete harms and whether their approaches are effective.

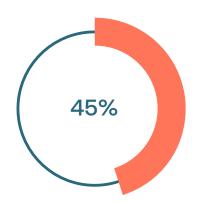
Data gaps relating to remedy are reflected in limitations in companies' practices.

Many companies aren't implementing the mechanisms necessary to provide an effective remedy for rights violations.



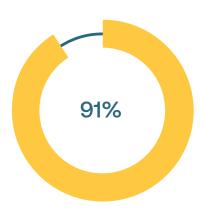
This potentially explains why disclosure on instances of remedy is lower. If many companies aren't implementing remedial measures, they can't gather or publish data on when remedy has been provided. 39 per cent of companies don't have a commitment to provide a remedy where the company has caused or contributed to adverse human rights impacts.

Similar shortcomings can be seen when it comes to grievance mechanisms.



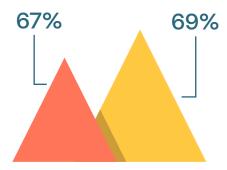
45 per cent of companies don't monitor whether supply chain workers have access to a grievance mechanism or didn't say whether they do. This is particularly concerning given the greater risks supply chain workers face of the most severe human rights risks, such as forced labour and human trafficking. Without access to a grievance mechanism, it is extremely unlikely companies will identify these violations, making the provision of remedy impossible.

The picture is more optimistic when considering the contingent workforce.



Contingent workers face greater human rights risks due to the greater levels of insecurity inherent to these roles. They are also often subject to less oversight, making access to grievance mechanisms even more important. 91 per cent of companies that provided details of the channel/mechanism through which employees can raise complaints or concerns stated that these were accessible to the company's non-employee direct operations workers.

When companies do provide mechanisms to support remedy, they aren't taking sufficient steps to monitor their effectiveness.

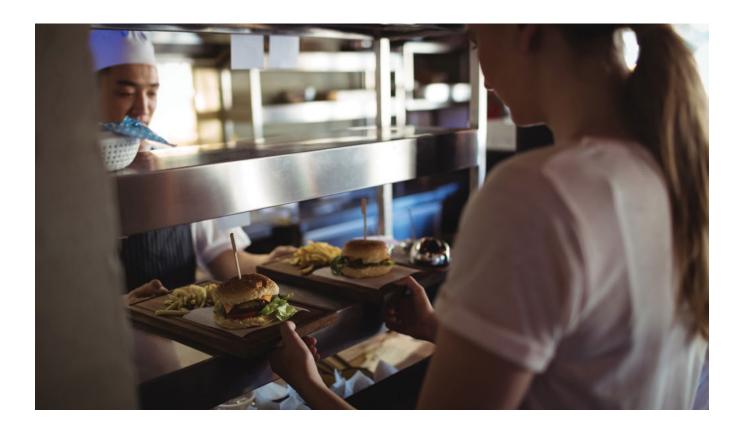


Despite good levels of disclosure on the steps companies are taking to tackle their salient human rights issues, there has been slow progress in the proportion of companies that are assessing the effectiveness of this. 67 per cent of companies provided this data in 2020, growing to 69 per cent in 2021.

A quarter of companies that conduct human rights due diligence didn't explain how the company has monitored the effectiveness of actions taken to address negative impacts on workers' rights. This calls into question the effectiveness of these companies' due diligence processes. Many companies are also failing to assess the success of the channel or mechanism through which employees can raise complaints or concerns.

59%

Just 59 per cent of companies that provided details on this assessed the effectiveness of these mechanisms against Principle 31 of the UN Guiding Principles on Business and Human Rights (UNGPs).



Finding 4

Organisations with a better understanding and implementation of diversity were also more inclusive.

Increasing diversity in companies is essential for repairing the historic marginalisation of many groups. However, unless organisations take steps to become genuinely inclusive, structural inequalities and systematic biases will continue to be reproduced in businesses. This makes companies' efforts at best, tokenistic, and at worse, actively exacerbates the inequalities they are meant to address.

Diversity data collection lays the foundation for creating inclusive organisations. However, many companies lack crucial information.

Companies can't make meaningful progress on diversity and inclusion unless they understand who is in their workforce and how they are being treated. Despite this, almost a quarter of companies (24 per cent) didn't provide the percentage of the company's total direct operations workforce within each age category.

This information was particularly poorly reported in IT companies, which had an average response rate of just 38 per cent. While this is disappointing, it isn't particularly surprising, given that tech companies have been at the forefront of numerous age-related discrimination disputes.¹⁰

Companies also didn't provide comprehensive data on indicators that demonstrate the success, or not, of diversity and inclusion initiatives. Responses on the rate of internal hires (as a percentage of total internal hires) by gender were very low across the board, with roughly half of companies failing to provide any data for either male or female workers.

54%

61%

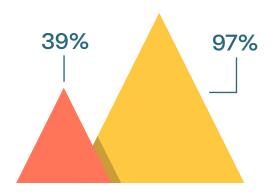
Similarly, over half of companies (54 per cent) didn't provide the number of discrimination and harassment incidents reported

...and even more (61 per cent) failed to explain the number of incidents resolved

This lack of data contrasts with the significantly more comprehensive information companies provided on the action the company has taken, or intends to take, to improve diversity and inclusion (which 99 per cent of companies responded to). As was the case in 2020, it appears that companies are still failing to take a sufficiently evidence-based approach to tackling diversity and inclusion, with the success of efforts to do so being heavily undermined with what appears to be, at best, an inconsistent picture of how equality manifests in companies.

Despite the benefits of comprehensive diversity and inclusion data, information on ethnicity continues to lag behind.

Some of the most significant data gaps related to ethnicity.



Less than half as many companies provided the percentage of the company's total direct operations workforce in leadership positions by race or ethnicity (39 per cent) compared to gender (97 per cent).

43%

Even when accounting for companies that are legally prohibited from collecting this data in any of their operating locations, 43 companies didn't provide any data whatsoever.

49%

Similarly, almost half of companies (49 per cent) provided no data on internal hires (as a percentage of total internal hires) by race or ethnicity, essential information for companies to identify whether diversity and inclusion efforts are making a difference.

There was a strong link in terms of both disclosure and practice on gender and ethnicity pay gaps that suggests pay disparities should be tackled holistically.

Every company that didn't provide data on the gender pay gap also didn't provide data on the ethnicity pay gap, suggesting that companies only move on to address ethnicity when they have first considered gender. Prioritising some aspects of data collection over others is often a necessity in large, complex global organisations, and so to some extent, this is understandable. However, WDI data revealed a strong link between the gender and ethnicity pay gaps that highlight the importance of not taking a siloed approach to these issues.

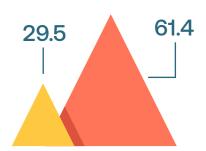
Among WDI responders, companies with high gender pay gaps (in the top 25 per cent of reported gender pay gaps in the WDI survey) are almost five times as likely to also have a high ethnicity pay gap (in the top 25 per cent of reported ethnicity pay gaps in the WDI survey).

More diverse organisations seem to also be more inclusive.

There appears to be a correlation between greater diversity and lower levels of discrimination and harassment.

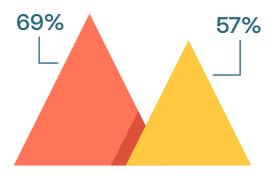


More diverse leadership was correlated with an increase in resolved incidents of discrimination and harassment. Companies with over 30 per cent female representation on boards had a higher percentage of discrimination and harassment incidents resolved (79 per cent on average) than those with below 30 per cent female representation on boards (55 per cent on average).



Similarly, companies with internal hire rates for women of over 50 per cent had less than half the average number of reported incidents of discrimination and harassment (29.5 incidents on average) than those with rates below 50 per cent (61.4 incidents on average).

Higher incidents of discrimination and harassment pose risks for companies. In this year's survey, companies with lower numbers of resolved incidents of discrimination and harassment also had higher voluntary and involuntary turnover rates for women.



There also seemed to be a positive relationship between collecting diversity data and the implementation of inclusive practices. For example, companies that provided data on the number of female workers earning wages equal to or just above the legal minimum wage were more likely to have a shared parental leave policy above the statutory minimum (69 per cent) than those that didn't (57 per cent).

Finding 5

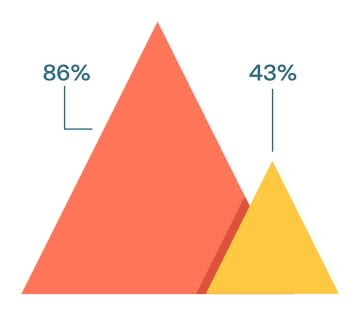
Despite the risks that inequality poses to companies and their workforces, businesses lack the basic data needed to tackle it.

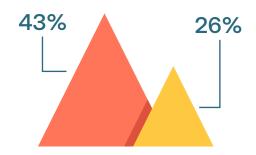
Under pressure to increase profits, many companies have adopted business practices that have widened social and economic gaps. This poses significant risks to workers and companies. For some workers, this manifests as precarious employment, with a lack of benefits and security. For others, it emerges in low pay and extreme pay disparities. Companies also suffer from inequality. It limits productivity and innovation, destabilises supply chains, constrains consumer spending and growth, breeds political instability, and jeopardises license to operate.¹¹

Companies' understanding of more precarious workers doesn't match that of more secure employees.

Despite making an increasing proportion of the workforce, ¹² contingent workers face often severe inequalities compared to their permanently secured counterparts. Lower wages, more limited access to benefits and insecure forms of employment all widen the gap in social and economic opportunities for these workers. ¹³ The differences in treatment of contingent and permanent workers were reflected in the WDI data:

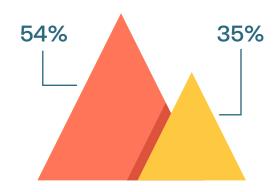
86 per cent of companies provided the proportion of their workforce that are employees but only 43 per cent provided the proportion that are on contingent contracts.





43 per cent of companies provided turnover data for indefinite staff compared to only 26 per cent for fixed-term workers.

54 per cent of companies provided some data on average training hours for indefinite workers but only 35 per cent had equivalent data for fixed-term workers.



Even though the precarious nature of contingent work excludes workers from growth and shared prosperity, wage level data on the contingent workforce is particularly scarce.

Contingent workers are more likely to experience job insecurity and in-work poverty than their permanently employed counterparts.¹⁷ Yet, companies aren't providing enough data to understand or rectify this imbalance. Almost half of companies (49 per cent) didn't explain how the company is working to improve wage levels for non-employee direct operations workers.

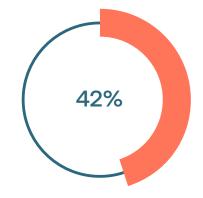
49%

Disclosure on wage levels and pay gaps more broadly is also low, despite the central role wages play in driving inequality.

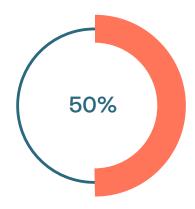
The current distribution of income and wealth leaves hundreds of millions of people struggling to meet their basic needs and to live well. Low wages drive inequality, increase the risk of worker poverty and financial hardship.^{14, 15} They can also lead to higher absentee rates, lower staff engagement and higher staff turnover for companies.¹⁶



Despite this, the section of the WDI survey on workforce wage levels and pay gaps had the lowest response rate in the entire survey, at 55 per cent.



Only 42 per cent of companies explained the proportion of male and female employees whose salary is equal to or just above the legal minimum wage.

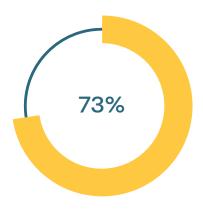


Half of companies provided data on the percentage of male and female employees in the bottom, lower middle, upper middle and upper pay quartiles.

Many companies continue to fail to pay workers enough for a decent standard of living.



Living wages are essential for ensuring workers don't live in poverty and starting to address economic inequalities. However, 32 per cent of companies didn't provide data on the extent they pay their employees a living wage.



73 per cent of companies did, however, report paying a living wage in all their operating locations. While this seems positive, the content of companies' answers suggests that in practice, the extent to which a living wage is being paid may be much lower.

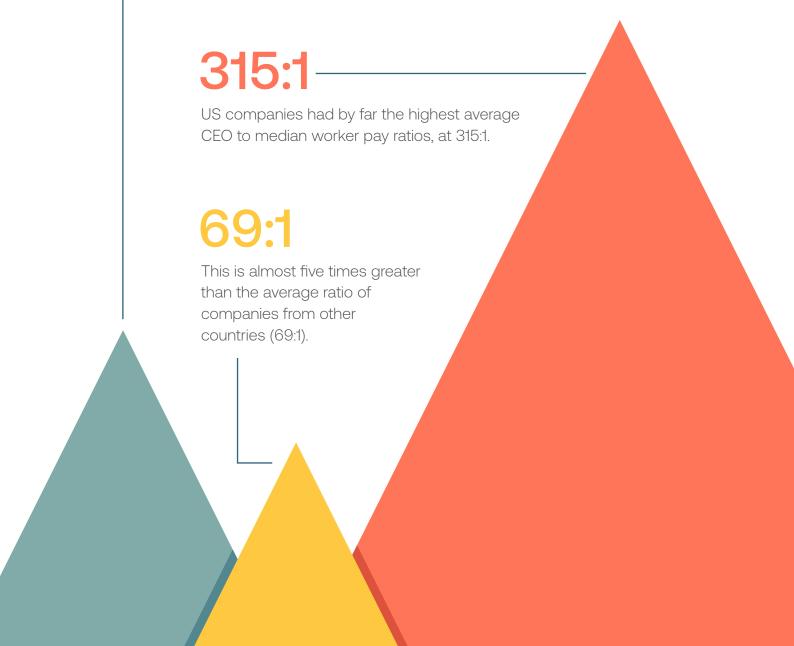
When companies provided information about the process for identifying living wage levels, the majority continued to refer to legal minimum wages. Given the fact that in many countries, legal minimum wages aren't enough to cover a basic standard of living for workers, this data suggests there is still much further go to before companies have a widescale impact on income inequality.

In contrast, executives are paid significantly more than the average worker, particularly in the US.

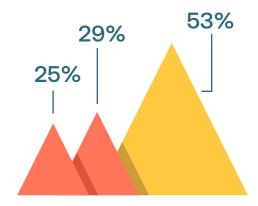
High CEO pay has been justified based on the link between executive performance and business success. In practice, however, this is not the case. CEO to median worker pay ratios aren't closely related to performance or shareholder returns and are higher in countries that have weaker institutions protecting workers.^{18, 19}

106:1

In the 2021 survey, the average company CEO to median worker pay ratio, at 106:1, remains high. This is despite the adverse impact high pay ratios have on employee morale, company performance and consumer preferences.²⁰

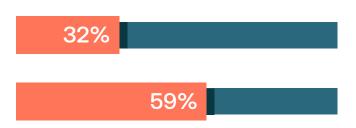


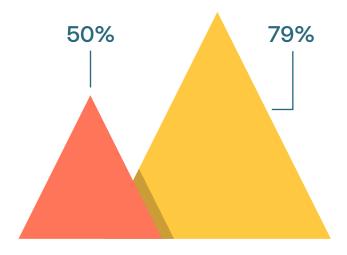
IT companies were some of the worst offenders when it came to addressing inequality.



Just 25 per cent of IT companies explained the proportion of male and female employees whose salary is equal to or just above the legal minimum wage. Only 29 per cent of IT companies provided wage level data by quartile, compared to 53 per cent of companies from all other sectors.

IT companies also fared particularly badly when it came to pay inequality linked to identity. The gender pay gap in the IT sector is 32 per cent, almost twice the overall average gender pay gap. The ethnicity pay gap in the IT sector is 59 per cent, about two and a half times the average ethnicity pay gap.





Similarly, IT companies had some of the lowest levels of understanding of the contingent workforce. IT was the sector least likely to explain how the company secures the right to freedom of association and collective bargaining for non-employee direct operations workers, a crucial mechanism for contingent workers to rectify disparities. 50 per cent of IT companies provided this data, compared to 79 per cent of companies from all other sectors.

Finding 6

When companies understand their supply chain, conditions for workers are more likely to be improved.

Decreased visibility, less stringent legal frameworks and downward pressures for cost and efficiency savings from buyers all create conditions in supply chains that significantly increase the risk of workers' rights violations. Increased transparency is an essential first step in addressing this, enabling companies to identify where risks are most acute and respond accordingly.



Companies continue to publish limited data on their supply chains.

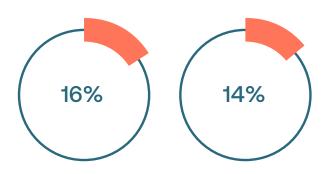
Understanding the structure and constitution of the supply chain is a necessary first step for any company looking to improve working conditions in the supply chain. However, less than half of WDI responders provided the number of first tier suppliers in the company's top 10 sourcing locations.

- Under a quarter stated that they collect data on the gender composition of the supply chain workforce.
- In addition, almost one in four companies didn't explain the specific products, services, and raw materials at particular risk of forced labour, modern slavery, and human trafficking.

North American companies provided particularly low levels of data here.

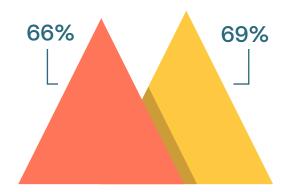


Companies from the USA (16 per cent) and Canada (29 per cent) were the least likely to disclose supply chain mapping of countries with five or more companies responding.

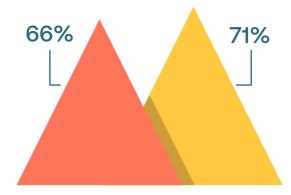


Companies from both countries also provided very little data on the number of first tier suppliers (16 per cent and 14 per cent respectively).

Progress is slowly being made on data addressing how companies are protecting and promoting supply chain workers' rights.



In 2021, slightly more companies described the measures in place to incentivise those responsible for the company's day-to-day sourcing decisions to effectively ensure the company meets responsible sourcing and workers' rights commitments (69 per cent, compared to 66 per cent in 2020).



Similarly, 71 per cent of companies described any steps or initiatives the company is taking to improve the working conditions of supply chain workers, an increase from 66 per cent in 2020.

Purchasing practices are often a key driver of worse conditions in the supply chain.



Positively, the proportion of companies explaining how they assess whether the company's purchasing practices allow a supplier to meet its workers' rights commitments also increased from 60 per cent in 2020 to 74 per cent in 2021. However, as was the case in 2020, most companies still spoke about their own responsible sourcing commitment and mechanisms to monitor supplier compliance, rather than identifying company purchasing practices that may be limiting suppliers' ability to meet these commitments.

Many companies don't explain how they are implementing crucial sourcing practices that promote better working conditions in the supply chain.



Improved supply chain practices require direct intervention from purchasing companies.

Less mature understandings of supportive workforce management, more lax legal frameworks in sourcing companies and a reduced capacity to implement good practices can all restrict the extent to which suppliers act responsibly.



However, 18 per cent of companies don't assess supplier performance against their own human rights commitments as part of the process for selecting new suppliers or can't say if they do. None of these companies described the process for monitoring or auditing supplier performance against a minimum set of labour standards, a basic first step in any responsible sourcing approach.

Many companies appear not to engage with suppliers on promoting workers' rights.



Just under 30 per cent of companies didn't explain the action the company has taken to build the capacity of its suppliers to mitigate and manage risks to workers' rights, including in their own supply chain.

When companies are transparent about their supply chains, they are more likely to have better supply chain practices.

Companies that provided more information on the structure of their supply chain had a clearer view of how they were promoting supply chain workers' rights, highlighting the central role of supply chain transparency in driving better practices.

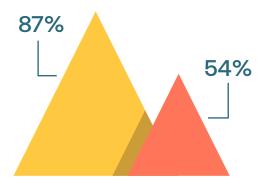
Companies that explained their efforts to map their supply chain provided significantly more data on how they are improving supply chain working conditions than those that don't. These companies were:

- **x4**
- Four times more likely to explain how they are promoting freedom of association and collective bargaining in their supply chains.
- **x2**
- Twice as likely to monitor whether supply chain workers have access to a grievance mechanism.
- x3

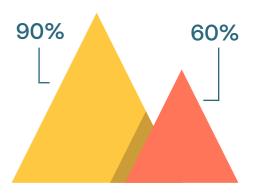
Three times more likely to explain how they are improving supply chain working conditions.



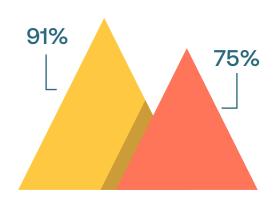
Data on the composition of the supply chain itself was also linked to a deeper understanding of responsible sourcing practices. Compared to companies that didn't explain the number of suppliers in the first tier of their supply chain, companies that provided this data were more likely to:



Explain how they incentivise those responsible for sourcing decisions to meet the company's responsible sourcing and workers' rights commitments (87 per cent compared to 54 per cent).



Assess the impact of sourcing commitments on suppliers' ability to meet workers' rights commitments (90 per cent compared to 60 per cent).



Assess supplier performance against human rights commitments (91 per cent compared to 75 per cent).



Provide data on steps to build supplier capacity to improve supply chain working conditions (98 per cent compared to 65 per cent).

References

Companies that completed the WDI survey in 2021 and their responses in 2020, 2019, 2018 and 2017

R = Responded D = Declined ? = No answer / = Not requested

Companies highlighted in yellow provided the most data to the WDI survey (or came in the top ten per cent in terms of the completeness of their response)

Organisation	2020	2019	2018	2017	Country	Sector
Abrdn	D	/	/	/	UK	Financials
Accor	R	?	?	/	France	Consumer Discretionary
Adidas	R	R	R	/	Germany	Consumer Discretionary
AIA Group	D	R	R	/	China	Financials
Air Liquide	?	?	R	/	France	Materials
AkzoNobel	?	D	?	/	Netherlands	Materials
Analog Devices	/	/	/	/	USA	Information Technology
Antofagasta	R	D	D	/	UK	Materials
Aristocrat	R	D	D	/	Australia	Consumer Discretionary
ASML Holding	R	R	R	/	Netherlands	Information Technology
ASOS	?	?	/	/	UK	Consumer Discretionary
Assa Abloy	R	R	/	/	Sweden	Industrials
Associated British Foods (ABF)	R	R	R	R	UK	Consumer Staples
AstraZeneca	R	R	R	R	UK	Health Care
AT&T	R	R	R	/	USA	Communication Services
Atos	R	R	R	/	France	Information Technology
BAE Systems	R	R	R	?	UK	Industrials

Ball Corporation	?	D	/	/	USA	Materials
Barclays	R	R	D	D	UK	Financials
Bayer	R	R	D	/	Germany	Health Care
BBVA	R	R	/	/	Spain	Financials
BCE	R	R	R	R	Canada	Communication Services
Beazley	R	?	?	/	UK	Financials
Berkeley Group	R	R	D	/	UK	Consumer Discretionary
BHP	R	R	R	R	UK	Materials
Biogen	R	?	?	/	USA	Health Care
BlackRock	/	/	/	/	USA	Financials
BMO Global Asset Management	R	/	/	/	UK	Financials
BMW	R	R	?	/	Germany	Consumer Discretionary
BNP Paribas	R	R	R	/	France	Financials
Bouygues	D	D	D	/	France	Industrials
British American Tobacco (BAT)	R	R	R	R	UK	Consumer Staples
Burberry	R	R	R	R	UK	Consumer Discretionary
CA Immo	/	/	/	/	Austria	Real Estate
Canadian National Railway (CN)	R	R	R	R	Canada	Industrials
Canadian Pacific Railway (CPR)	R	R	R	/	Canada	Industrials
Capgemini	R	R	?	/	France	Information Technology
Carlsberg	D	D	D	/	Denmark	Consumer Staples
Cellnex Telecom	?	/	/	/	Spain	Communication Services
Centrica	R	R	R	R	UK	Utilities
Cisco	R	R	R	/	USA	Information Technology
CNH Industrial	R	R	D	/	UK	Industrials
Compass Group	R	R	R	R	UK	Consumer Discretionary

ConvaTec	R	R	R	/	UK	Health Care
Crédit Agricole	R	?	?	/	France	Financials
Croda International	R	R	?	/	UK	Materials
DFS Furniture	?	/	/	/	UK	Consumer Discretionary
Diageo	R	D	D	R	UK	Consumer Staples
Direct Line	R	R	R	/	UK	Financials
Dominion Energy	R	R	/	/	USA	Utilities
DS Smith	D	D	D	/	UK	Materials
E.ON	?	D	?	/	Germany	Utilities
Enel	R	R	R	/	Italy	Utilities
Engie	R	?	R	/	France	Utilities
Eni	R	R	?	/	Italy	Energy
Essity	R	R	/	/	Sweden	Consumer Staples
Evraz	R	R	/	/	UK	Materials
Fast Retailing	R	?	/	/	Japan	Consumer Discretionary
Ferguson	R	R	R	R	UK	Industrials
Fresenius Medical Care (FMC)	D	D	D	/	Germany	Health Care
Fresenius SE & Co. KGaA	R	/	/	/	Germany	Health Care
Fresnillo	R	?	?	?	Mexico	Materials
Fujitsu	R	R	?	/	Japan	Information Technology
GlaxoSmithKline (GSK)	R	R	R	R	UK	Health Care
Grainger	R	?	/	/	UK	Real Estate
Gruppo TIM	?	?	?	/	Italy	Communication Services
H&M	R	R	R	R	Sweden	Consumer Discretionary
Hargreaves Lansdown	R	R	R	/	UK	Financials
Helios Towers	?	/	/	/	USA	Financials
Iberdrola	R	R	/	/	Spain	Utilities

IHG (InterContinental Hotels Group)	R	R	R	D	UK	Consumer Discretionary
Imperial Brands	R	R	D	D	UK	Consumer Staples
Inditex	R	R	R	R	Spain	Consumer Discretionary
ING	R	R	R	/	Netherlands	Financials
Intel	R	R	R	/	USA	Information Technology
International Consolidated Airlines Group	R	R	R	R	UK	Industrials
Intuit	R	?	?	/	USA	Information Technology
Johnson Matthey	D	D	?	/	UK	Materials
Jupiter Asset Management	R	R	/	/	UK	Financials
Kering	R	R	R	/	France	Consumer Discretionary
Kingfisher	R	R	D	/	UK	Consumer Discretionary
KPN	R	R	/	/	Netherlands	Communication Services
Landsec	R	R	R	R	UK	Real Estate
Lanxess	/	/	/	/	Germany	Materials
Legal & General	R	/	/	/	UK	Financials
Lloyds Banking Group	R	R	R	?	UK	Financials
London Stock Exchange Group	R	?	?	/	UK	Financials
LVMH	R	R	R	/	France	Consumer Discretionary
Mahindra & Mahindra	?	D	D	/	India	Consumer Discretionary
Marks & Spencer (M&S)	D	?	D	D	UK	Consumer Discretionary
Marriott International	?	D	?	/	USA	Consumer Discretionary
Marshalls Group	?	/	/	/	UK	Materials
Mastercard	R	R	R	/	USA	Information Technology
METRO AG	R	?	?	/	Germany	Consumer Staples
Microsoft		R	R		USA	Information Technology

Mondi	R	R	R	R	UK	Materials
Mowi	R	D	/	/	Norway	Consumer Staples
MTN Group	R	R	?	/	South Africa	Communication Services
National Express Group	?	?	?	/	UK	Industrials
National Grid	R	R	D	D	UK	Utilities
Natwest Group	R	R	R	R	UK	Financials
Nestlé	R	R	R	R	Switzerland	Consumer Staples
Nike	R	?	D	?	USA	Consumer Discretionary
Nokia	R	R	R	/	Finland	Information Technology
Novartis	D	D	D	/	Switzerland	Health Care
NVIDIA	/	/	/	/	USA	Information Technology
Orange	R	R	R	/	France	Communication Services
PayPal Holdings	R	?	?	/	USA	Information Technology
Pearson	R	R	R	/	UK	Communication Services
PensionBee	/	/	/	/	UK	Financials
Persimmon	R	R	R	/	UK	Consumer Discretionary
PostNL	R	/	/	/	Netherlands	Industrials
Prudential	R	R	R	/	UK	Financials
Puma	D	/	/	/	Germany	Consumer Discretionary
Quantum Advisors	/	/	/	/	India	Financials
Reckitt	R	R	R	?	UK	Consumer Staples
Redrow	?	?	?	/	UK	Consumer Discretionary
Relx	R	R	R	R	UK	Industrials
Rio Tinto	R	R	D	D	UK	Materials
Rolls-Royce Holdings	R	R	R	D	UK	Industrials
Safaricom	/	/	/	/	Kenya	Communication Services
Sainsbury's	R	R	R	R	UK	Consumer Staples

Saint Gobain	R	R	R	R	France	Industrials
Sanofi	R	R	R	/	France	Health Care
Santander	R	?	?	/	Spain	Financials
Schindler Holding	D	D	/	/	Switzerland	Industrials
Schneider Electric	R	R	R	/	France	Industrials
SEGRO	R	R	R	/	UK	Real Estate
Seven & i Holdings	?	?	?	/	Japan	Consumer Staples
SGS	R	R	?	/	Switzerland	Industrials
Singapore Telecommunications	?	?	D	/	Singapore	Communication Services
Societe Generale	?	?	?	/	France	Financials
Sodexo	R	R	R	/	France	Consumer Discretionary
Softcat	?	/	/	/	UK	Information Technology
Solvay	D	D	R	/	Belgium	Materials
Spirax-Sarco Engineering	R	/	/	/	UK	Industrials
SSE	R	R	R	R	UK	Utilities
St. James's Place	R	R	?	/	UK	Financials
Standard Chartered	R	R	R	R	UK	Financials
Svenska Handelsbanken	?	?	R	/	Sweden	Financials
Swiss Life Holding	?	D	D	/	Switzerland	Financials
Symrise	R	/	/	/	Germany	Materials
Taiwan Semiconductor Manufacturing Company	?	?	/	/	Taiwan	Information Technology
Taylor Wimpey	D	R	R	/	UK	Consumer Discretionary
Teck	R	D	/	/	Canada	Materials
Telefónica	R	?	?	/	Spain	Communication Services
Teleperformance	/	/	/	/	France	Industrials
Telstra	R	R	R	/	Australia	Communication Services

Tencent Holdings	R	?	?	/	China	Communication Services
Tesco	R	R	D	D	UK	Consumer Staples
The Gym Group	?	/	/	/	UK	Consumer Discretionary
The Toronto-Dominion Bank	R	R	?	/	Canada	Financials
TotalEnergies	R	?	?	/	France	Energy
Toyota Motor	R	R	R	/	Japan	Consumer Discretionary
Tyson Foods	R	R	?	/	USA	Consumer Staples
UCB	R	D	?	/	Belgium	Health Care
Umicore	R	D	/	/	Belgium	Materials
UniCredit	R	?	/	/	Italy	Financials
Unilever	R	R	R	R	UK	Consumer Staples
United Utilities	R	R	R	/	UK	Utilities
UPM-Kymmene	R	R	?	/	Finland	Materials
Vale	D	R	/	/	Brazil	Materials
Veolia	R	R	R	/	France	Utilities
Vinci	R	R	?	R	France	Industrials
Visa	R	?	?	/	USA	Information Technology
Vodafone	R	?	D	D	UK	Communication Services
Volkswagen (VW)	R	R	R	/	Germany	Consumer Discretionary
Waste Connections	R	?	/	/	Canada	Industrials
Wells Fargo	R	D	?	/	USA	Financials
Wheaton Precious Metals	?	?	/	/	Canada	Materials
Whitbread	D	D	D	/	UK	Consumer Discretionary
Woolworths Group	R	R	D	/	Australia	Consumer Staples
Zalando	?	?	/	/	Germany	Consumer Discretionary

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