

GRI Revision of Economic Impact Topic Standards

Phase 2 - **Impact on institutions**

GRI 205: Anti-Corruption 2016

GRI 415: Public Policy 2016



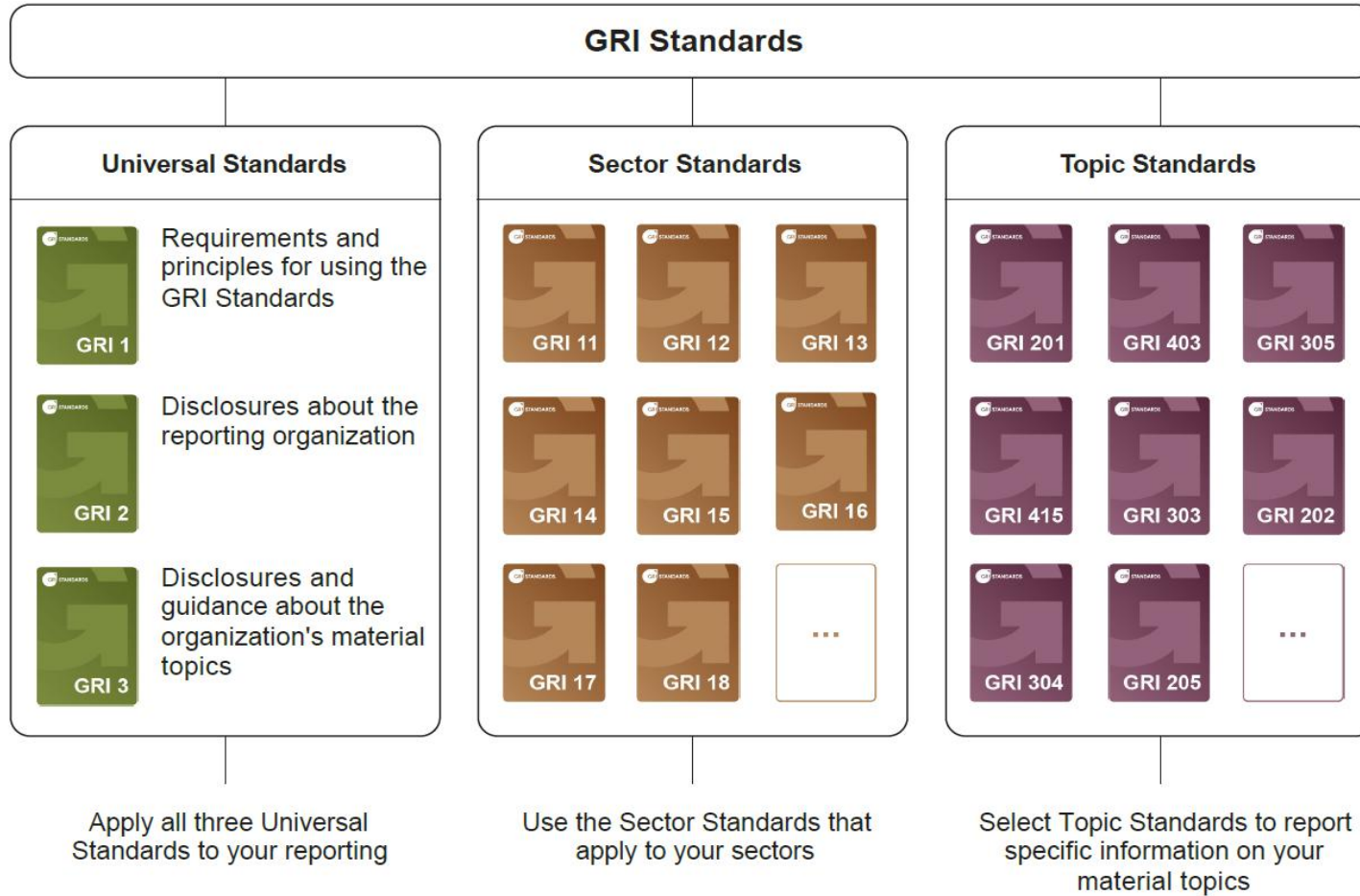
Agenda





GRI Topic Standards Project for Economic Impact - Overview -

Structure of GRI standards



Package Phase 2 Economic Impact Standards
← **GRI 205: Anti-Corruption 2016**
GRI 206: Anti-Competitive Behavior 2016
GRI 415: Public Policy 2016

GRI Topic standards project for Economic Impact: Objective

Background reading

- 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 review aims to represent internationally agreed best practice and align with authoritative intergovernmental instruments related to an organization’s impact on the economy, and institutions that govern market mechanisms such as the:
 - United Nations (UN)
 - Guiding Principles on Business and Human Rights (Guiding Principles, UNGPs) and
 - the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.
 - ...
- GRI also aims at **alignment and interoperability between GRI Standards and the ESRS**, where possible

GRI Topic Standards Project for Economic Impact Phases - Public Call End Dates

Background reading

- **Phase 1 (2025) - Distributed Performance**

- GRI 201: Economic Performance 2016

- **Phase 2 (April 2026) - Impact on institutions**

- GRI 206: Anti-Competitive Behavior
- GRI 205: Anti-Corruption
- GRI 415: Public Policy

- **Phase 3 - Economic multiplier, Job Creation and Goods and Services**

- GRI 202: Market Presence
- GRI 203: Indirect Economic Impacts
- GRI 204: Procurement

Project Overview

Q3 2023	● GSSB approval of the project proposal
Q1 2024	● Appointment of the Economic Impact Working Group. Bios available under Related documents
Q2 2024 – Q2 2025	● Content development by the Working Group (Phase 1 and Phase 2)
Q3 – Q4 2025	● Public comment period for Phase 1 Standard
Q3 2025	● GSSB approval of Phase 1 and Phase 2 standards for public exposure
Q1 2026	● Public comment period for Phase 2 Standards and analysis of public comments for Phase 1
Q1 2026 – Q2 2026	● Analysis of public comments for Phase 2 Standards
Q3 2026	● GSSB approval of final draft of Phase 1 Standard for publication
Q4 2026	● GSSB approval of final draft of Phase 2 Standard for publication



EFRAG's Rationale

Rationale for EFRAG's comment letter (1)

- EFRAG's mission statement : acting as the "European voice" in corporate reporting
- GRI Standards are referred to in CSRD (recital 43) as well as in draft ESRS 1 AR 5 of the revised ESRS and ESRS 1 para 131 of set 1; GRI being referred as a source of entity-specific information. In this respect, GRI Standards are relevant for ESRS and it is considered meaningful to contribute to the GRI public consultation to express the European views.

CSRD

(43) Sustainability reporting standards should be proportionate and should not impose an unnecessary administrative burden on companies that are required to use them. In order to minimise disruption for undertakings that already report sustainability information, sustainability reporting standards should take account of existing standards and frameworks for sustainability reporting and accounting where appropriate. Such existing standards and frameworks include the **Global Reporting Initiative**, the Sustainability Accounting Standards Board, the International Integrated Reporting Council, the International Accounting Standards Board, the Task Force on Climate-related Financial Disclosures, the Carbon Disclosure Standards Board, and CDP, formerly known as the Carbon Disclosure Project.

ESRS set 1

131. (b) complement its disclosures prepared on the basis of the topical **ESRS** with an appropriate set of additional disclosures to cover **sustainability matters** that are material for the undertaking in its sector(s), using available best practice and/or available frameworks or reporting standards, such as **IFRS industry-based guidance** and **GRI** Sector Standards.

Draft ESRS

AR 5 for para. 12
(Sources for entity-specific disclosures)

(131(b) amended) In developing its entity-specific disclosures, the undertaking may use available best practices, frameworks or reporting standards, such as IFRS industry-based guidance and GRI Standards (including GRI topic and sector standards).

Rationale for EFRAG's comment letter (2)

- EFRAG builds on a **longstanding collaboration with Global Reporting Initiative**, with the objective of ensuring alignment and interoperability between the GRI Standards and the ESRS. A tangible outcome of this successful cooperation was the publication in 2023 of both a **Memorandum of Understanding** and the **GRI–ESRS Interoperability Index**.
- EFRAG and GRI have committed to continue working together to deliver technical support for reporting companies. While, GRI has participated in the public consultation of the revised ESRS by sending a formal comment letter to EFRAG, the latter is taking steps to prepare its comment letter to GRI.
- GRI is a **voluntary reporting** regime with a high adaption rate worldwide.
 - Statistics for 2024 : Asia-Pacific (75%), Europe (71%), the Americas (70%), and the Middle East & Africa (64%) (source KPMG Survey 27/11/2024)



EFRAG's Approach

EFRAG Approach to the revised GRI standards

- **Draft interoperability analysis**
 - Sub-topic level mapping
 - Per GRI Standard :
 - Mapping at disclosure and datapoint level
 - Preliminary analysis of relevant EU law
- **Output**
 - **Public Comment Letter by early April**



Draft interoperability analysis

Sub-topical mapping – GRI to ESRS

Mapping between GRI Economic Impact Standards vs ESRS G1 subtopics

GRI revised standards	ESRS sub-topics	ESRS Coverage	Relevant EU law
GRI 206: Anti-competitive Behavior	Not covered – therefore EFRAG will not comment	Not covered – therefore EFRAG will not comment	Yes – EU competition law to ensure the proper functioning of the internal market
GRI 205: Anti-corruption	Anti-corruption and anti-bribery	Covered	Yes – as part of the EU’s anti-corruption policy framework, to combat and prevent corruption
GRI 415: Public Policy	Political influence, including lobbying activities	Covered	Yes – for instance EU Transparency Register for lobbying activities; regulation on funding of European political parties (political contributions)

Sub-topical mapping – ESRS to GRI

Mapping between ESRS G1 subtopics vs GRI Economic Impact Standards

ESRS	ESRS sub-topics	GRI standards	Coverage
G1	Corporate culture, including	/	Not covered
	Anti-corruption and anti-bribery	GRI xx: Corruption (ED)	Covered in Topic Standard
	Protection of whistle-blowers	GRI 2: General Disclosures	Covered in Universal Standard
	Animal welfare	GRI 13 : Agri, Aqua, Fishing	Covered in Sector Standard
	Political influence, including lobbying activities	GRI xx: Public Policy (ED)	Covered in Topic Standard
	Management of relationships with suppliers, including	GRI 308: Supplier Environmental Assessment 2016 GRI 414: Supplier Social Assessment 2016 GRI 204: Procurement Practices (Phase 3)	Covered in Topic Standards
	Payment practices, especially late payment to SMEs	/	Not covered



CORRUPTION (COR)

Overview of Corruption (COR) Draft Standard

- The ED proposes
 - **A revised scope of the term 'corruption'**. Expanded beyond traditional forms such as bribery, facilitation payments, and fraud to include emerging practices such as the abuse of digital data and the involvement of intermediaries acting on behalf of the organization.
 - Note: definition deleted from glossary of the standard, but added in the section 'Background on the topic'
 - Include **new top management disclosure** and **expands guidance**

Definition : comparison GRI 2016- GRI ED

GRI 2016 : glossary	GRI ED : background on the topic
<p>'abuse of entrusted power for private gain', which can be instigated by individuals or organizations</p> <p>Source : Transparency International, 2011</p> <p>Note: Corruption includes practices such as bribery, facilitation payments, fraud, extortion, collusion, and money laundering. It also includes an offer or receipt of any gift, loan, fee, reward, or other advantage to or from any person as an inducement to do something that is dishonest, illegal, or a breach of trust in the conduct of the enterprise's business. <u>This can include cash or in-kind benefits, such as free goods, gifts, and holidays, or special personal services provided for the purpose of an improper advantage, or that can result in moral pressure to receive such an advantage</u></p>	<p>Abuse of entrusted power for private gain (source Transparency International, 2025)</p> <p><u>Corruption can occur within an organization directly, by its governance body members, employees, and workers, or indirectly through intermediaries, such as associations working on behalf of the organization.</u> Corruption can take many forms, including bribery, facilitation payments, fraud, extortion, collusion, and money laundering. It also includes the offer or receipt of gifts, loans, fees, rewards, or other advantages as an inducement to engage in conduct that is dishonest, illegal, or represents a breach of trust. Other forms of corruption may involve the abuse of digital data, embezzlement, trading in influence, abuse of function, illicit enrichment, concealment, and obstruction of justice.</p>

Definition: comparison GRI - ESRS

- ESRS separates corruption and bribery, while GRI considers bribery as form of corruption.
- GRI explicitly expands the scope beyond traditional forms – ESRS includes a non-exhaustive list of practices

ESRS	GRI ED :
<p>Corruption: Abuse of entrusted power for private gain, which can be instigated by individuals or organisations. It includes practices such as facilitation payments, fraud, extortion, collusion, and money laundering. It also includes an offer or receipt of any gift, loan, fee, reward, or other advantage to or from any person as an inducement to do something that is dishonest, illegal, or a breach of trust in the conduct of the undertaking’s business. This can include cash or in-kind benefits, such as free goods, gifts, and holidays, or special personal services provided for the purpose of an improper advantage, or that can result in moral pressure to receive such an advantage.</p>	<p>Corruption: Abuse of entrusted power for private gain.</p> <p>Corruption can occur within an organization directly, by its governance body members, employees, and workers, or indirectly through intermediaries, such as associations working on behalf of the organization. Corruption can take many forms, including bribery, facilitation payments, fraud, extortion, collusion, and money laundering. It also includes the offer or receipt of gifts, loans, fees, rewards, or other advantages as an inducement to engage in conduct that is dishonest, illegal, or represents a breach of trust. Other forms of corruption may involve the abuse of digital data, embezzlement, trading in influence, abuse of function, illicit enrichment, concealment, and obstruction of justice.</p>
<p>Bribery: Dishonestly persuading someone to act in your favour by giving them a gift of money or another inducement.</p>	

BC23. There are many descriptions of corruption but it has been defined by the European Commission as the abuse of power for private gain. However, it wears many guises and may include bribery, trading in influence, the abuse of functions or position, nepotism, creation of monopolies, conflicts of interest, or uncontrolled revolving doors between the public and the private sectors. The effects of

- Interaction with other frameworks
 - **UN Convention against Corruption (UNCAC)** the Convention addresses various existing forms of corruption (such as bribery, embezzlement, trading in influence, abuse of functions), but it does not define corruption, and in so doing, enables States to be flexible in confronting other forms of corruption that may emerge in the future → *now aligned with the Draft GRI*.
 - **Financial Action Task Force (FATF)** : aligned with UNCAC approach
- **EU anti-corruption package**
 - No single definition – aligned with UNCAC approach

Background:

On 3 May 2023, the Commission adopted anti-corruption package. This includes a **proposal for a new Directive** on combating corruption by criminal law. On 2 December 2025, the Parliament and the Council reached a provisional agreement on the directive.

There is no single definition of corruption as corruption exists in different forms involving different participants. Indeed, corruption is an endemic phenomenon that takes multiple shapes and forms across all facets of society, for example bribery, embezzlement, trading in influence, trading of information, abuse of functions and illicit enrichment [27](#).

During the negotiations of UNCAC, United Nations States Parties carefully considered whether to develop a legal definition of corruption. It was concluded that any attempt at a comprehensive definition would inevitably fail to address some forms of corruption. As a consequence, the international community reached consensus on certain manifestations of corruption while leaving each State free to go beyond the minimum standards set forth in UNCAC [28](#)

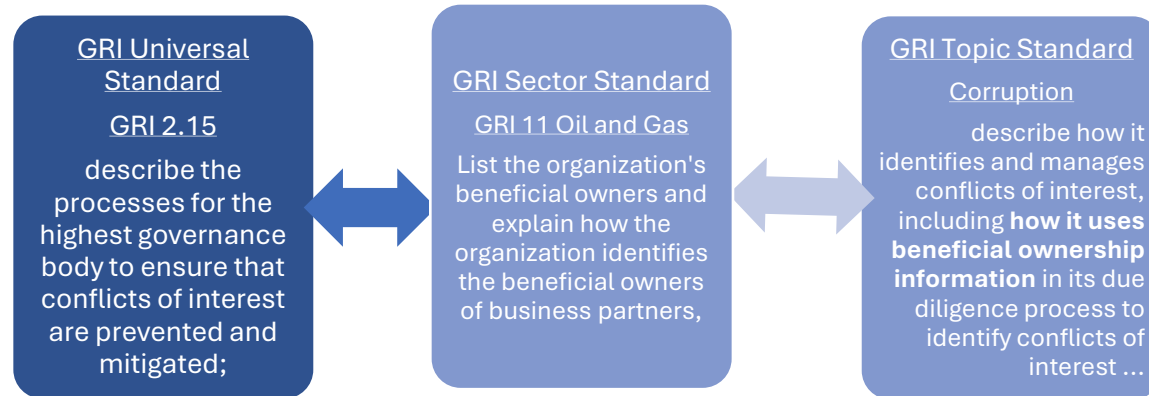
Overview of Corruption (COR) Draft Standard: Key changes from GRI 2016 to GRI 2025 ED and Interoperability with ESRS

GRI Draft Proposal		Changes from 2016 GRI standard	Notes on Interoperability Analysis with ESRS
Topic management disclosure	COR-1 Prevention of corruption	Updated/ New Approach to preventing corruption; governance structures responsible for overseeing anti-corruption practices; business partners at risk, beneficial ownership in due diligence. (note: previously recommendations)	ESRS 2 IRO and GOV Both the GRI and ESRS have general, sector-agnostic topic management disclosures. G1-2 Actions ESRS has a more principle-based approach with the GDR-A and the DP requiring the undertaking's procedures to detect, investigate, and respond to allegations or incidents related to corruption or bribery. GRI is more granular with more detailed specifications.
Topic disclosure	COR-2 Functions and business partners assessed for corruption	Updated Expansion of the scope (from operations to organizational functions and business partners)	G1-1 and G1-2 GRI requires not only the disclosure of at-risk functions but also business partners
	COR-3 Incidents of corruption and actions taken	Updated Additions to increase granularity (breakdowns by country and by outcome; workers who are not employees; qualitative information; contextual information on how data has been compiled).	G1-4 GRI DR is wider in scope and more granular. The main divergence lies in the guidance on 'confirmed incidents'. GRI adopts a broader mandatory scope than Revised ESRS, by requiring the disclosure of all confirmed incidents of corruption, regardless of whether they result in formal legal proceedings, including incidents confirmed through internal investigations. By contrast, the Revised ESRS narrows mandatory disclosure to legally finalized outcomes only. >< GRI is silent on action taken to address breaches in procedures and standards of anti-corruption and anti-bribery.
	COR-4 Communication and training on anti-corruption	Updated Additions (workers who are not employees); Deletions (of breakdowns by country; mandatory breakdown by type of business partner and employee category; recommendations to the whole standard).	G1-2 Simplified ESRS only requires reporting on training actions (more restrictive in scope and no metrics). GRI also includes metrics on coverage of communication regarding policies / procedures.

GRI ED 2025 and ESRS ED November 2025: key areas

GRI	GRI Rationale	ESRS	ESRS Rationale
Functions (previously: operations)	Focus expanded from operations to functions and business partners	Functions and/or roles (Amended ESRS) (Set 1: functions)	The wording was revised to promote more focused disclosure, by clarifying that not all roles of a given function may be at risk.
Business partners (previously: operations)	Reflects increased alignment with value chain transparency and OECD due diligence expectations	/	Note: Was considered in the first draft Business Conduct 2022: included for training, confirmed incidents DA 2023: included as may for confirmed incidents
Conflicts of interest (already included in 2016 as "should", but now mandatory as "shall")	Elevates conflict-of-interest governance as a key element in preventing corruption impacts.	/	Considered in the ESRS Set 1 BfC as an aspect of corruption (cfr. EU policy approach) Was considered in sector-specific (FIs, ...)
Beneficial ownership information, as part of conflict of interest due diligence (previously: not included)	Alignment with FATF principles	/	Was considered sector-specific (OG, MQC, ...) and in first draft Business Conduct 2022

Beneficial ownership across the GRI



- The notion of beneficial ownership appears in the topic and sector standard.
- The identification of beneficial ownership is a prerequisite for its use.
- Given that beneficial ownership is now treated as a sector-agnostic element, it would be more conceptually consistent for the corruption standard to focus on whether and how the organization identifies beneficial ownership as part of its due-diligence process to identify conflicts of interest.

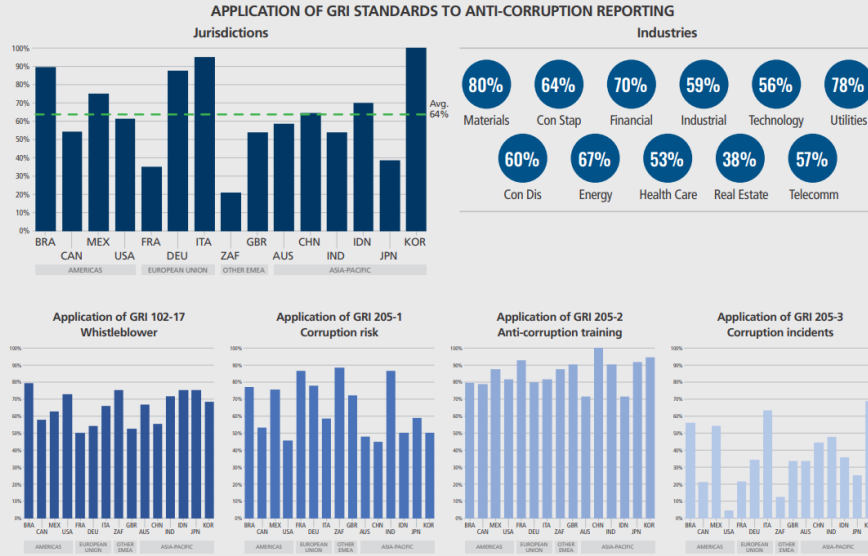
Transparency on beneficial ownership in EU :

Access to beneficial ownership information is restricted to certain categories of natural and legal persons by the Anti-Money Laundering legislation → If undertakings are not a) “obliged entities” carrying out customer due diligence, and b) do not qualify as having a “legitimate interest” to access this information, they may face limitations in accessing beneficial ownership information.

Application of Anti-Corruption Reporting Standards

- GRI Standards are the most commonly used for anti-corruption disclosure, but rates vary between jurisdictions
 - All companies in South Korea use the GRI standard along with most in Brazil (89%), Germany (88%) and Italy (95%)
 - France (35%) and South Africa (21%) – each of whom have mandatory anti-corruption reporting requirements - have low rates of GRI usage
- Specific anti-corruption GRI Standards are applied selectively
- Just 18% of companies that used the GRI Standards for anti-corruption disclosure applied all the three anti-corruption standards (GRI 205) and the whistle-blower standard (GRI 102-17)
 - GRI 205-2 is the most common disclosure in the GRI Standards – applied by 86% of companies that use GRI Standards
 - GRI 205-3 is the least common disclosure in the GRI Standards – applied by 42% of companies that use GRI Standards

*Companies were determined to apply the GRI Standards for anti-corruption disclosures if they used at least one of four standards: GRI 102-17, GRI 205-1, GRI 205-2, GRI 205-3.



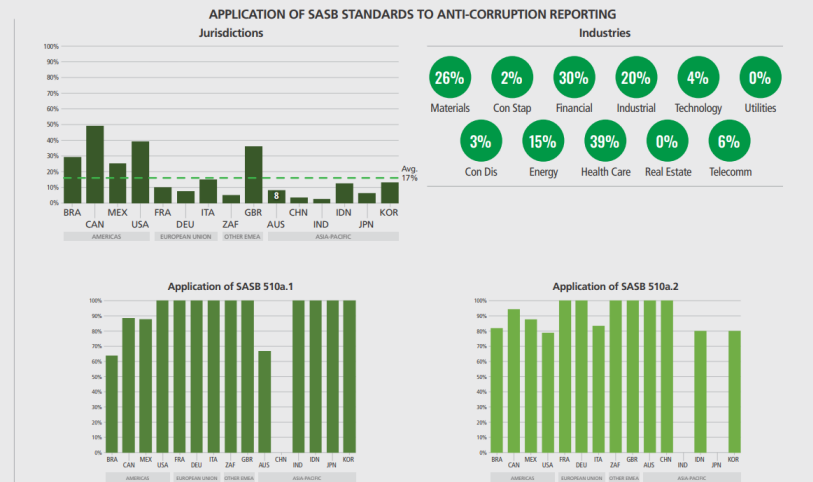
Source: IFAC, Transparency International UK and the World Economic Forum's Partnering Against Corruption, 2023

Application of Anti-Corruption Reporting Standards

- 17% of companies reviewed applied the SASB Standards—largely in the Americas and the UK
 - Metals & Mining
 - Oil & Gas – Exploration & Production
 - Oil & Gas – Services
 - Financials
 - Health Care
 - Infrastructure

- Most companies that use the SASB standards apply both parts
 - SASB 510a.1 is applied by 91% of companies that use SASB standards
 - SASB 510a.2 is applied by 86% of companies that use SASB standards

*Companies were determined to apply the SASB Standards for anti-corruption disclosures if they used at least one standard: SASB 510a.1, SASB 510a.2.





PUBLIC POLICY (PP)

Overview of Public Policy (PP) Draft Standard

- The revised GRI Public Policy Standard addresses a key gap in sustainability reporting by linking organizations' public policy engagement activities with their stated commitments and impacts.
 - **New** Topic Management Disclosure PP-1 on the public policy **position**
 - **New** Topic Management Disclosure PP-2 on public policy **alignment**
 - **Updated** Topic Disclosure PP-3 on public policy **engagement**
 - **Updated guidance**

Overview of Public Policy (PP) Draft Standard: Key changes from GRI 2016 to GRI 2025 ED and Interoperability with ESRS

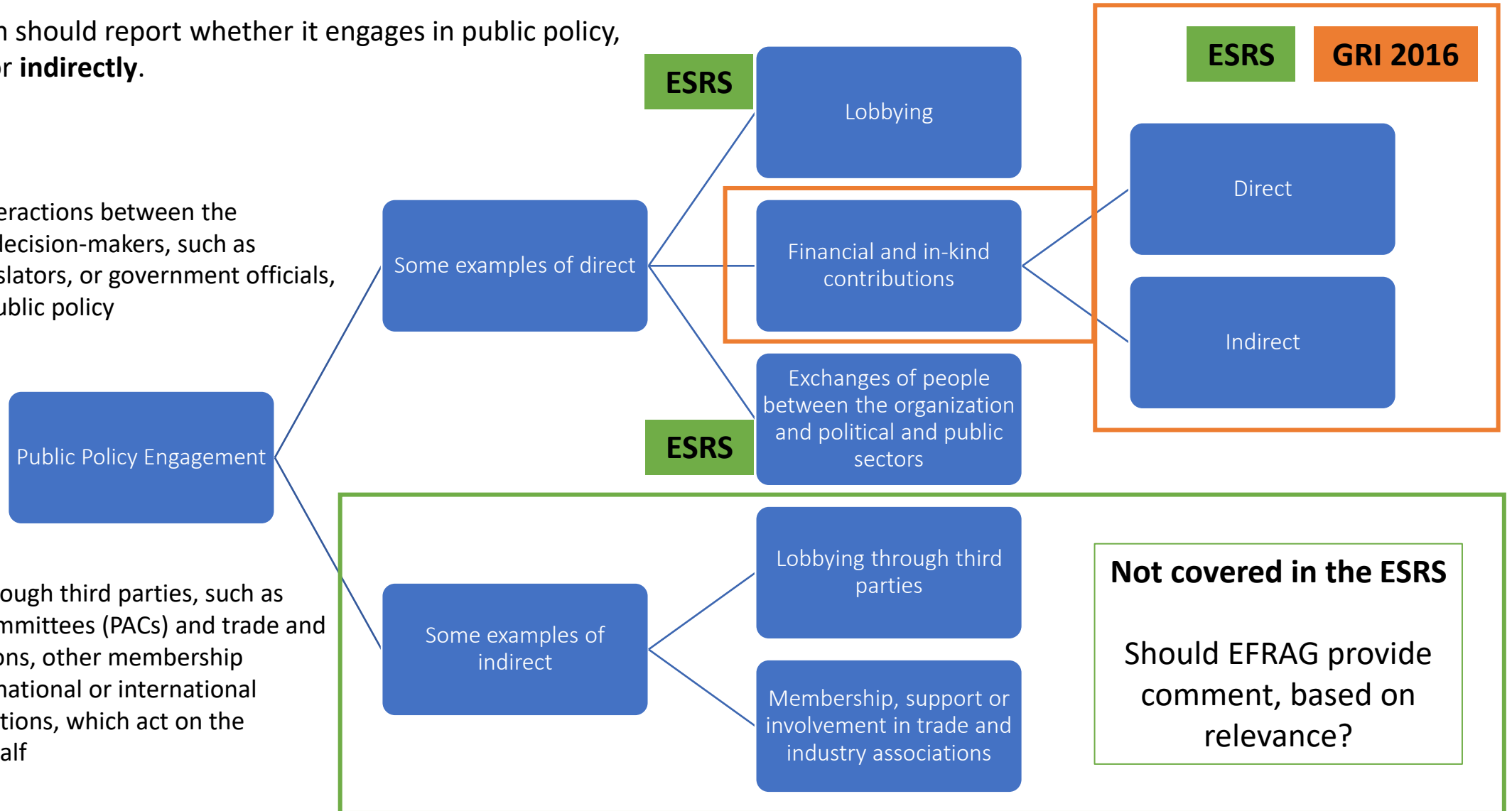
GRI Draft Proposal		Changes from 2016 GRI standard	Notes on Interoperability Analysis with ESRS
Topic management disclosure	PP1- Public policy position	New – DRs added to complement Disclosure 3-3 in GRI3 (note: previously recommendations)	G1-5 ESRS places stronger emphasis on the link between lobbying activities and the undertaking’s material sustainability IROs. GRI focuses more explicitly on transparency at policy-area level, including the relevance to the organization and its stakeholders, and consistency between policy positions and public commitments.
	PP2- Public policy alignment	New : It focuses on preventive and reactive arm to tackle misalignment. <ul style="list-style-type: none"> ○ Approach to ensure alignment between its public policy positions, publicly-stated policies and commitments, and public policy engagement activities ○ Approach to ensure alignment between its public policy positions and the public policy position of third parties Note: broad scope including (i) the parent entity and any subordinate entities across all countries and (ii) third parties	GOV-1 ESRS GOV-1 establishes a governance framework for oversight and accountability of all material sustainability IROs, including target-setting and monitoring at board level. GRI seeks transparency on the approach including systems, processes, and governance mechanisms ensuring consistency and alignment in public policy engagement, both internally and with third parties.
Topic disclosure	PP3 – Public policy engagement	Updated : It adds a focus on BROADER public policy activities than merely political contributions. Note: DP direct link with PP1 and PP2	G1-5 ESRS specifies which types of political influence should be disclosed. GRI provides a broader approach to public policy engagement, requiring detailed disclosure of engagement types, actors involved, and related expenditures, including methodological transparency. (See visualisation on the next slide)

PP-3: changes and alignment with the amended ESRS

The organization should report whether it engages in public policy, either **directly** or **indirectly**.

Direct: involve interactions between the organization and decision-makers, such as policymakers, legislators, or government officials, which influence public policy

Indirect: occur through third parties, such as political action committees (PACs) and trade and industry associations, other membership associations, and national or international advocacy organizations, which act on the organization's behalf

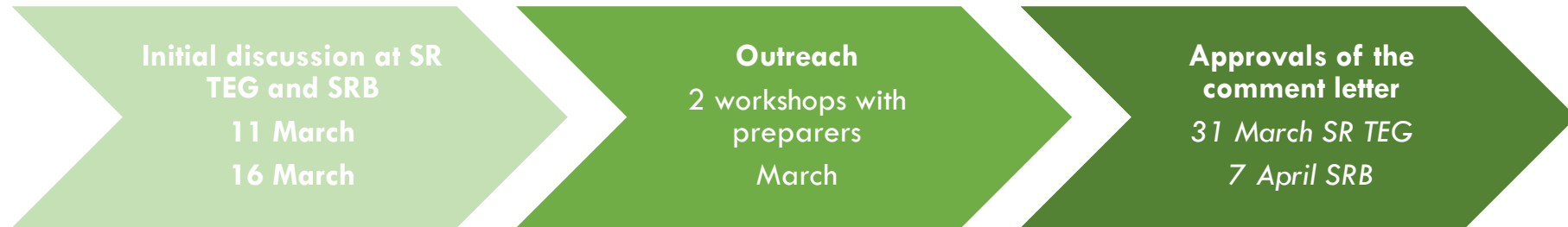


- EU Regulation (*EU, Euratom*) No 1141/2014 on the statute and funding of European political parties and European political foundations
 - Annual limit per donor per European political party, value of EUR 18.000
 - Donation means any cash offering, any offering in kind, ...
 - Other forms of donations: the provision below market value of any goods, services (including loans) or works, and/or any other transaction which constitutes an economic advantage for the European political party or the European political foundation concerned, with the exception of contributions from members and of usual political activities carried out on a voluntary basis by individuals;
- Member states : variation in country law regarding funding of national political parties
 - No cap on amount: Germany, Netherlands, Italy, ...
 - Prohibited : France, Belgium, ...



Next steps

Next steps





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