WDi
Workforce Disclosure Initiative

Workforce Disclosure in 2019: Trends and Insights

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 and increasing understanding of the salience of topics covered within the annual WDI survey.

Investors are increasingly realising the benefits of the WDI:
- In 2019, 100 per cent of sampled signatories reported the WDI data as useful
- Over 80 per cent used the data to influence their exchanges with companies

As the programme enters its fourth year, the WDI is moving to a self-sustaining funding model, by charging a modest membership fee for investors wanting to continue as signatories. Fees are tiered according to the value of investors' assets, with a lower rate for asset owners. The WDI will continue to be funded by philanthropic grants in addition to investor fee income.

By continuing to support the WDI, investors can demonstrate their unequivocal commitment to the 'S' of Environmental, Social and Governance principles. Investor signatories receive full access to all data submitted by companies, company disclosure scorecards and multiple opportunities to shape the WDI as it grows.

To support the WDI's work or to ask questions about benefits of membership please contact james.coldwell@shareaction.org or call +44 (0) 20 3137 5878.

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Front page photo by Sol on Unsplash

Foreword

By Vincent Kaufman and Matthias Narr, Ethos

Dear reader,

The current Coronavirus crisis significantly disrupts the world as we know it, from our daily lives to the global economy. It also reveals the importance of protecting workforces and building resilient supply chains. By promoting transparency regarding corporate policies and practices that define the lives of workers around the globe, the Workforce Disclosure Initiative (WDI) aims to improve the quality of jobs in companies' direct operations and supply chains. Encouraging companies to better look after their staff and suppliers is a means to prevent social unrest and extreme political outcomes, thus essential for stable societies and markets. For long-term oriented institutional investors, it is crucial to integrate into investment decisions reliable and comparable data on how our investee companies manage their workforce.

Greater workforce transparency is essential to make progress. In some jurisdictions the regulator has taken note and introduced legislation requiring greater disclosure of workforce topics such as the 'Devoir de Vigilance' in France or the 'Transparency in Supply Chains Act' in California. Here in Switzerland we are currently debating whether to introduce mandatory human rights due diligence to protect workers in global supply chains. However, none of this legislation allows investors to compare companies located in different countries. This is where the WDI plays a very important role. The constructive engagement between investors and companies within the WDI results in common indicators and standardised data sets on workforce topics. This in turn builds understanding of workforce issues, leading to better outcomes for workers and companies alike. For this reason, we commend the 118 companies which have taken part in the 2019 survey and contributed to this push for workforce transparency.

Decent working conditions both within companies and across supply chains have been an important part of Ethos Foundation's work since its creation more than 20 years ago. In fact, Ethos was launched by pension funds with the goal of fostering long term investment approaches that take into account not just the needs of shareholders but of all stakeholders. Ethos is grateful to have such a valuable tool at hand for its dialogues with companies. We are proud to continue to support the WDI while it enters its next phase. We are hopeful that in the future even more companies will participate and we are convinced that an ever increasing number of investors will use the WDI data in their investment and stewardship activities.

Happy reading!

Vincent Kaufman
CEO, Ethos

Matthias Narr
Senior Engagement Manager, Ethos

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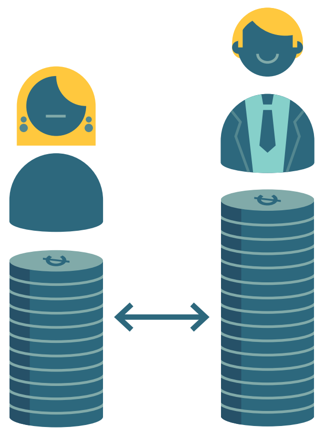
Introduction

Why safeguarding workforces is important

Global inequality has doubled over the last decade[1]...

...precarious work is increasingly becoming the new norm...



...and it will be 100 years before we close the gender pay gap[2]

Investors are more interested than ever in data on the specific steps companies and their boards are taking to safeguard their workforces and supply chain relationships.

Despite progress in improving working conditions and pay in some parts of the world, there remains a huge gap in the amount of meaningful and publicly available corporate data on workforce matters worldwide.

As the world braces for the biggest shock to the global economy in living memory caused by Covid-19, the impact on the most vulnerable workers globally can already be felt. With estimates that up to 195 million jobs could be lost as a result of the virus in the coming year[3], the fair treatment of workers has never been more important. While the response of governments will be a major determinant in averting job losses, the way businesses respond is also instrumental in the protection of jobs and livelihoods, and ensuring safe working conditions. At this time, investors are more interested than ever in data on the specific steps companies and their boards are taking to safeguard their workforces and supply chain relationships[5]. Investors increasingly recognise that firms taking positive steps in this regard will be more resilient in the current crisis and better equipped to succeed in the future.

Why is the Workforce Disclosure Initiative important?

By increasing the volume and quality of data on workforce governance structures, risk management, health and safety, and other related practices, we enable investors to push companies to improve their policies and practices.

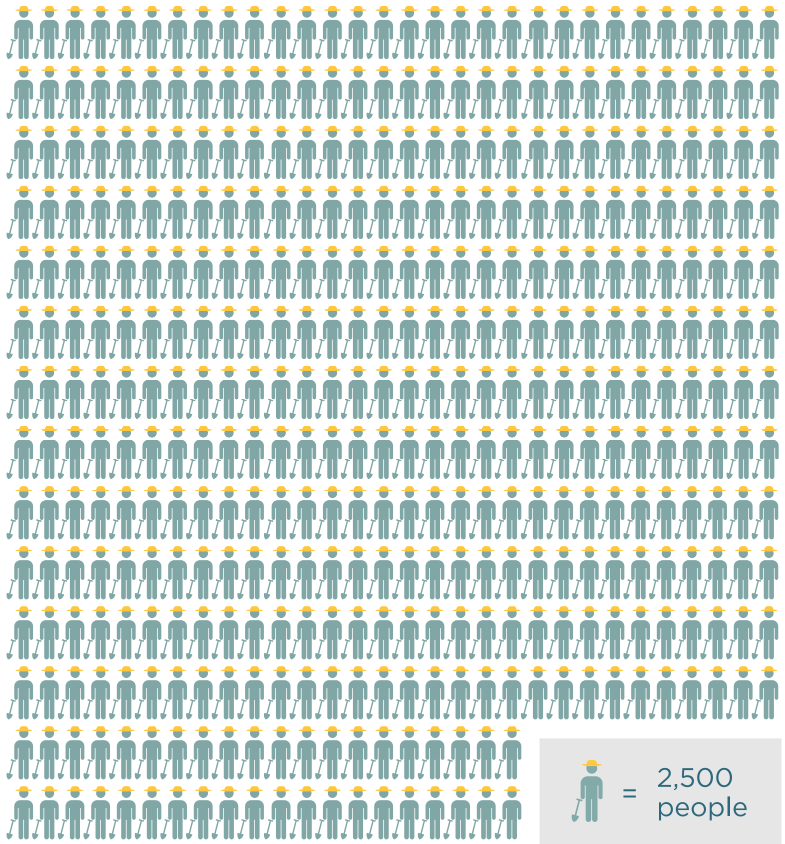
The Workforce Disclosure Initiative (WDI) was launched in 2016 to do precisely this. By bringing together almost 140 investors with $14 trillion assets under management, we harness their power to encourage companies to provide public data to the 10 sections of the survey, which covers wage levels, turnover, development opportunities and more.

The Workforce Disclosure Initiative in its third year:

The WDI welcomed submissions from 118 companies

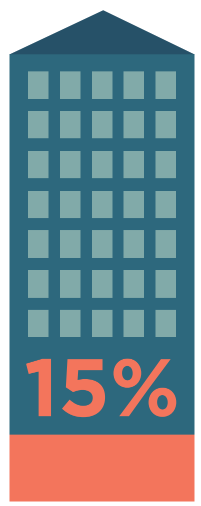
Submissions came from 17 countries, including first time submissions from South Africa, Brazil and Russia

For the third year in a row, we saw 11 sectors report to the WDI[5]



Submissions covered 10 million employees in companies' direct operations and many more in supply chains.

But we know for the WDI to be a true success, we must reach even more companies – and the workers they represent – in the coming years. With just 15 per cent of companies approached in 2019 completing the survey, we need to see more pressure from the WDI investor signatories in 2020 to increase the amount of data being reported on the workforce.



This report sets out a summary of the findings from the 2019 WDI reporting cycle, including trends companies are reporting by sector and geography, average levels of survey completeness and insights by section. Six thematic findings were identified based on governance, stability, Living Wages, grievance mechanisms, contingent workers and sourcing practices.

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 social cohesion, poverty and inequality (Goal 10) and ends harmful gender stereotypes (Goal 5).

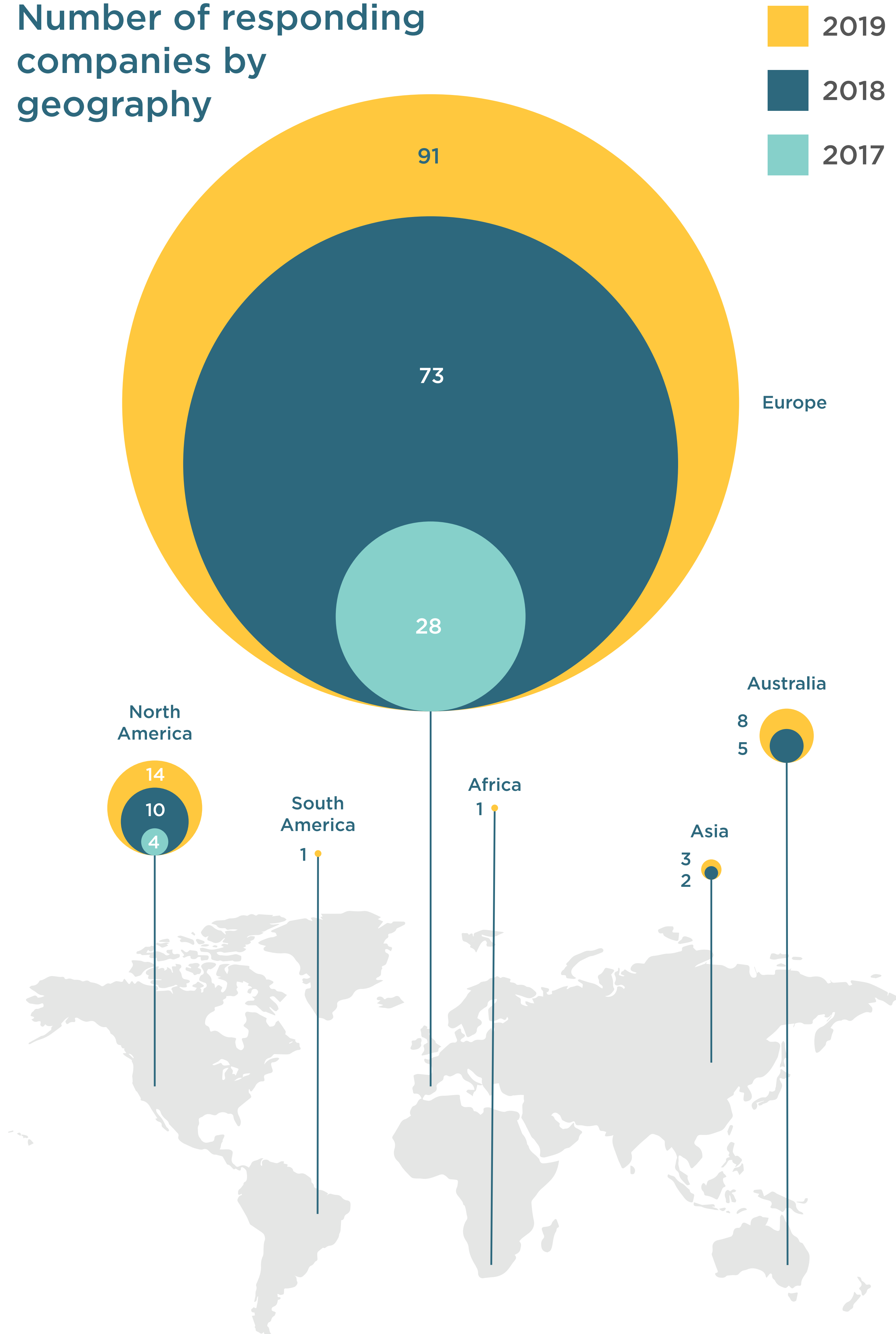
Environmental, social and governance (ESG) principles

With interest in environmental, social and governance (ESG) principles increasing year-on-year, the risks associated with poor workforce policies and practices can no longer be ignored by the investment community or companies themselves. Some investors – especially WDI investor signatories – are increasingly aware of the damage poor workforce management can have on company performance, but there is still a long way to go before the "S" of ESG gets the attention it deserves. Similarly, some companies are aware of the role workers play in contributing to their value, but improvements to policies and practices lag behind this realisation.

Workforce disclosure at a glance

More companies each year are submitting data to the Workforce Disclosure Initiative. In 2019, 118 companies completed the WDI survey, an increase of more than 30 per cent compared with 2018.

Number of responding companies by geography



Number of participating companies by sector

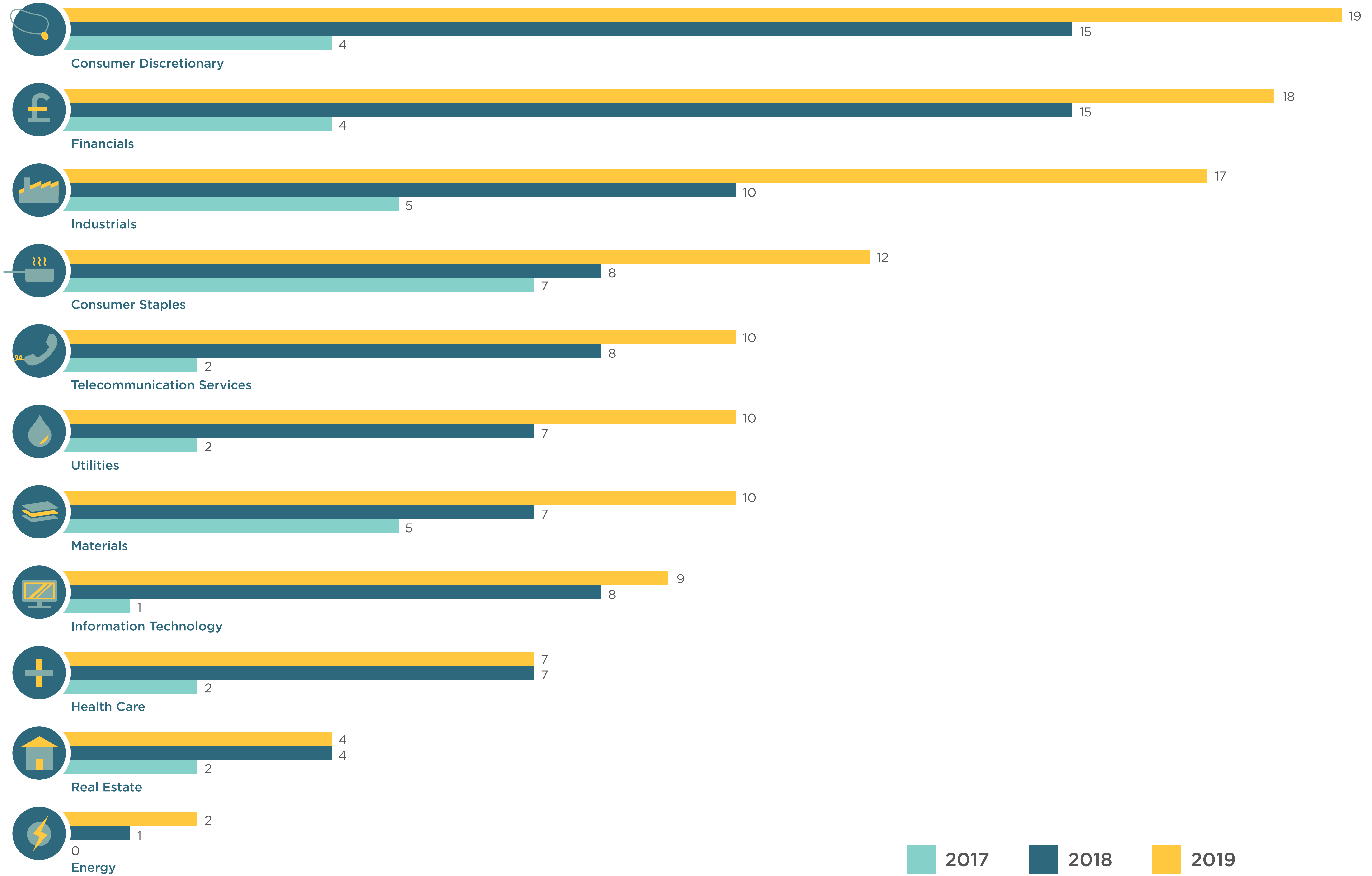
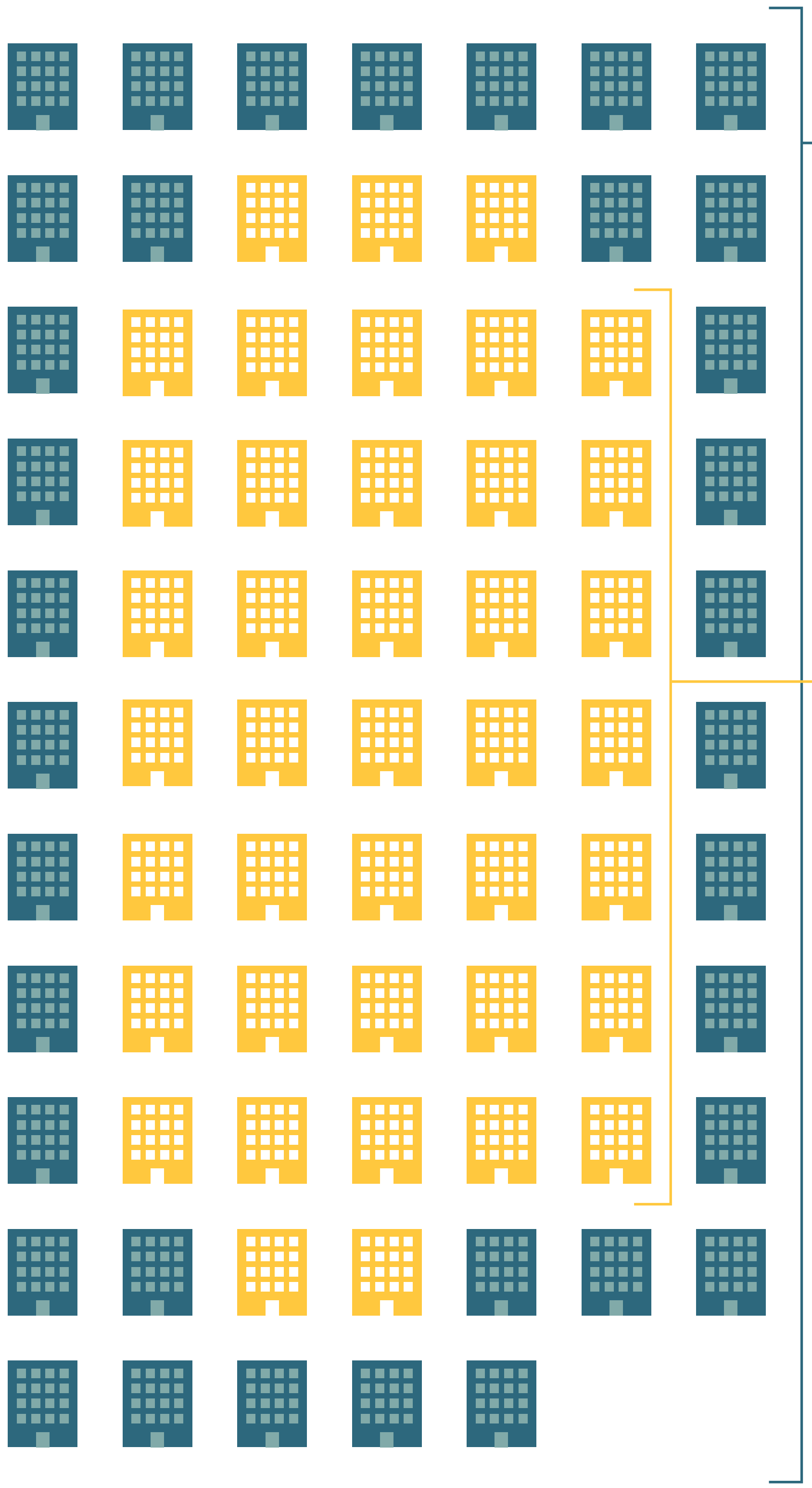


Photo by Marcos Paulo Prado on Unsplash

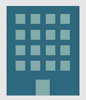
Top risks and opportunities reported by companies in 2019

Selection of companies



In 2019, the 137 WDI investor signatories requested 750 of the largest publicly listed companies from around the world take part in the WDI reporting cycle.

Of those 750, 390 ‘core’ companies were selected to received tailored and focused engagement.

 = 10 companies

Company selection was based on a combination of:

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

Making more workforce data available

Central to the WDI's mission is making more data on workforce policies and practices available publicly. The WDI encourages increased transparency on important areas of workforce reporting such as workforce composition (including contingent workers), wage levels and pay gaps, human rights due diligence processes and steps taken to monitor and address supply chain risks, that companies traditionally do not consistently disclose.

Releasing more workforce data into the public domain opens up company practice to increased scrutiny from investors, civil society organisations, media and consumers. It improves investor understanding of an organisation's approach to its workforce and can enable companies to learn from each other. Taken together these measures help increase the provision of good jobs and fair wages worldwide.

WDi

The WDI survey includes:

180	364
questions	data points

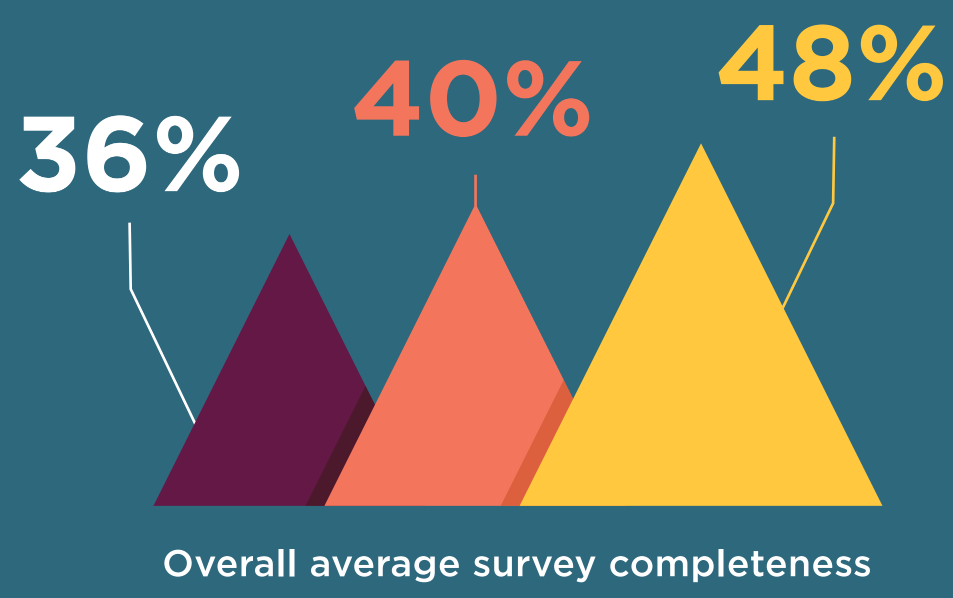
across 10 thematic sections

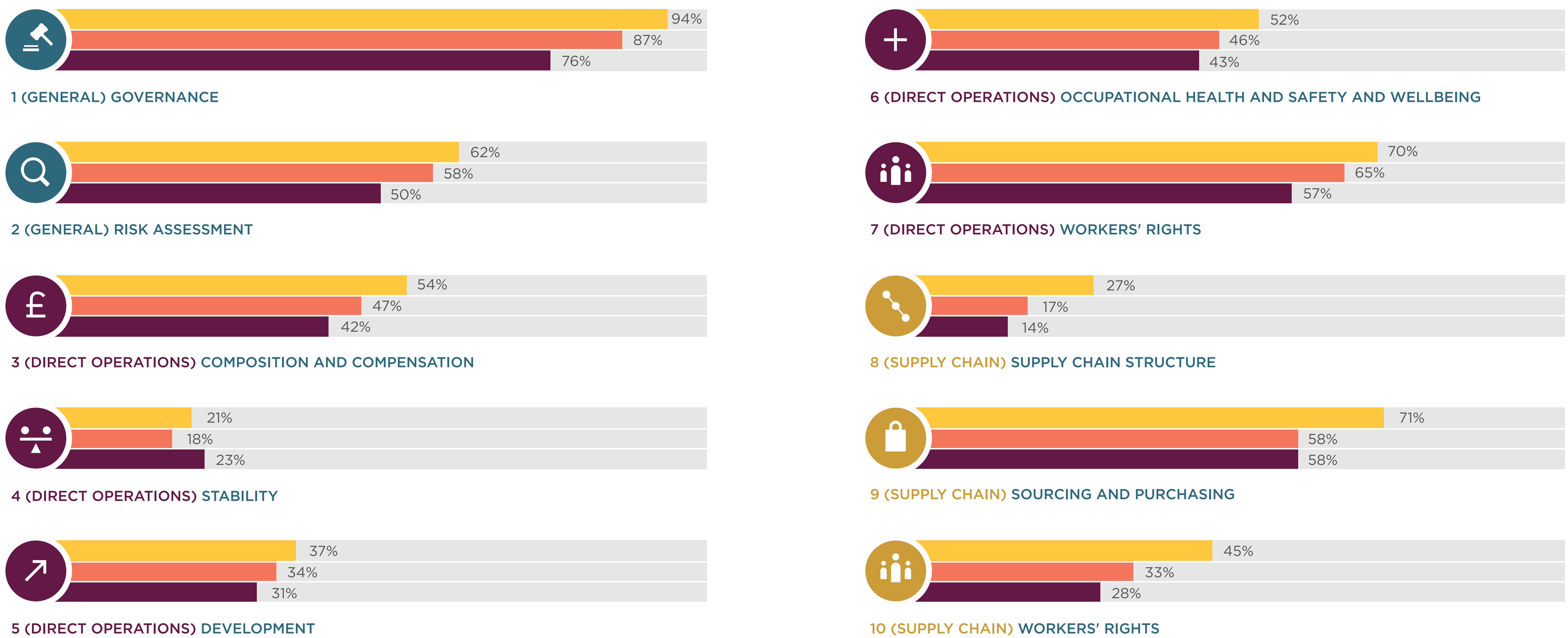
The survey is designed to challenge companies workforce data collection. As a result, only 40 per cent of the total survey was completed in 2019 on average. The challenging nature of the survey helps companies' think about what data they currently collect on their workforce and how this could be improved in the future.

The longer companies take part in the WDI, the more of the survey they are able to complete

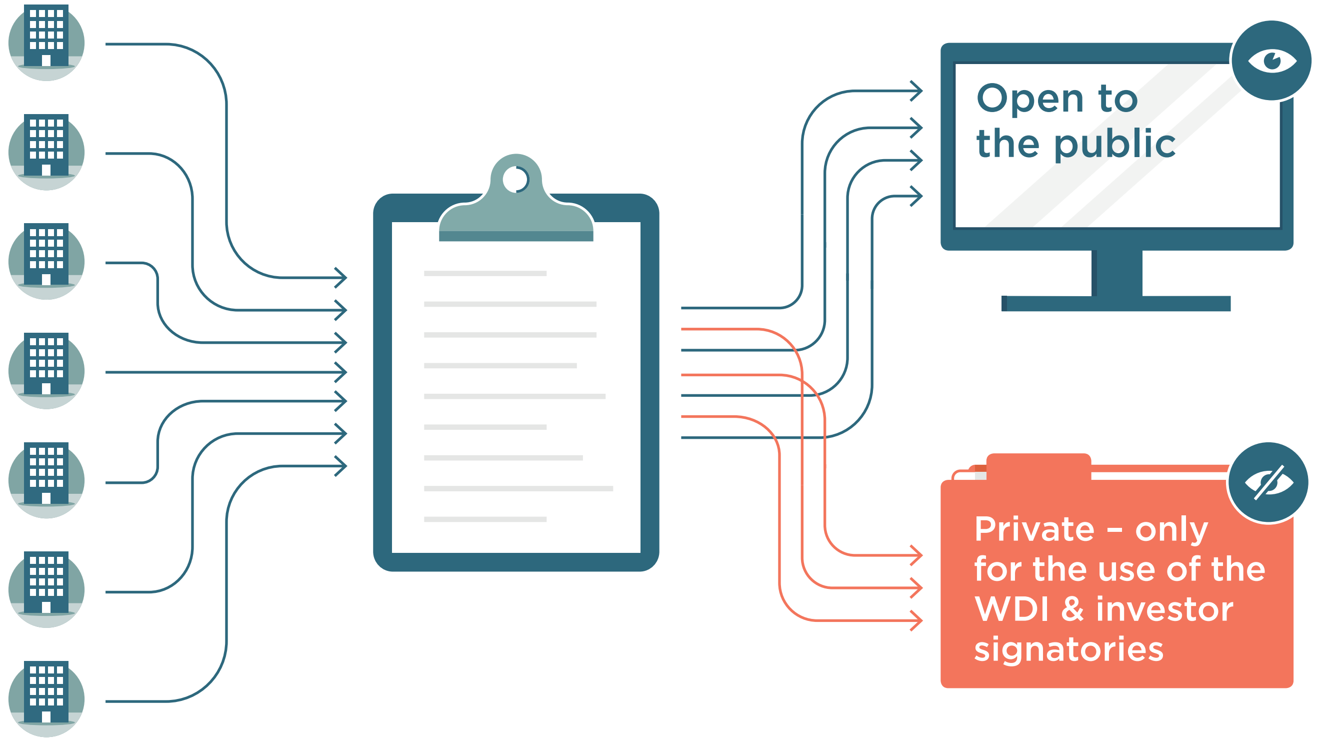
This graph shows the trends in the percentage of the WDI survey questions completed (by survey section) for companies responding for a third year in a row compared to companies responding for a second time and first time responders

- Companies participating for the third time
- Companies participating for the second time
- Companies participating for the first time

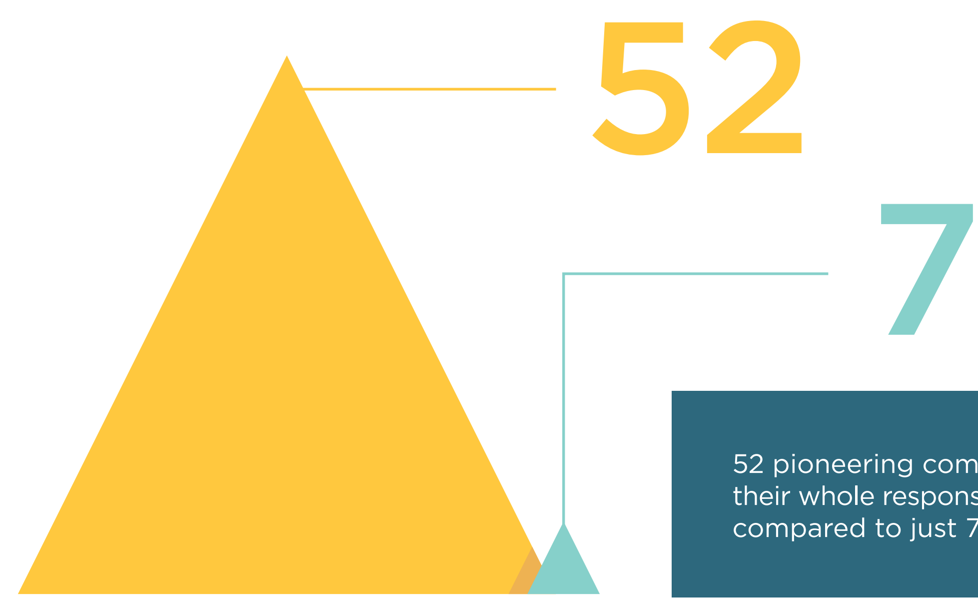




Public versus private data collected by the WDI



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 three years, companies have had the option into share data publicly or privately.



52 pioneering companies made their whole response public in 2019 compared to just 7 in 2018

Mandatory public data

The WDI asks 34 questions, the responses to which are made available to the public through the WDI website.

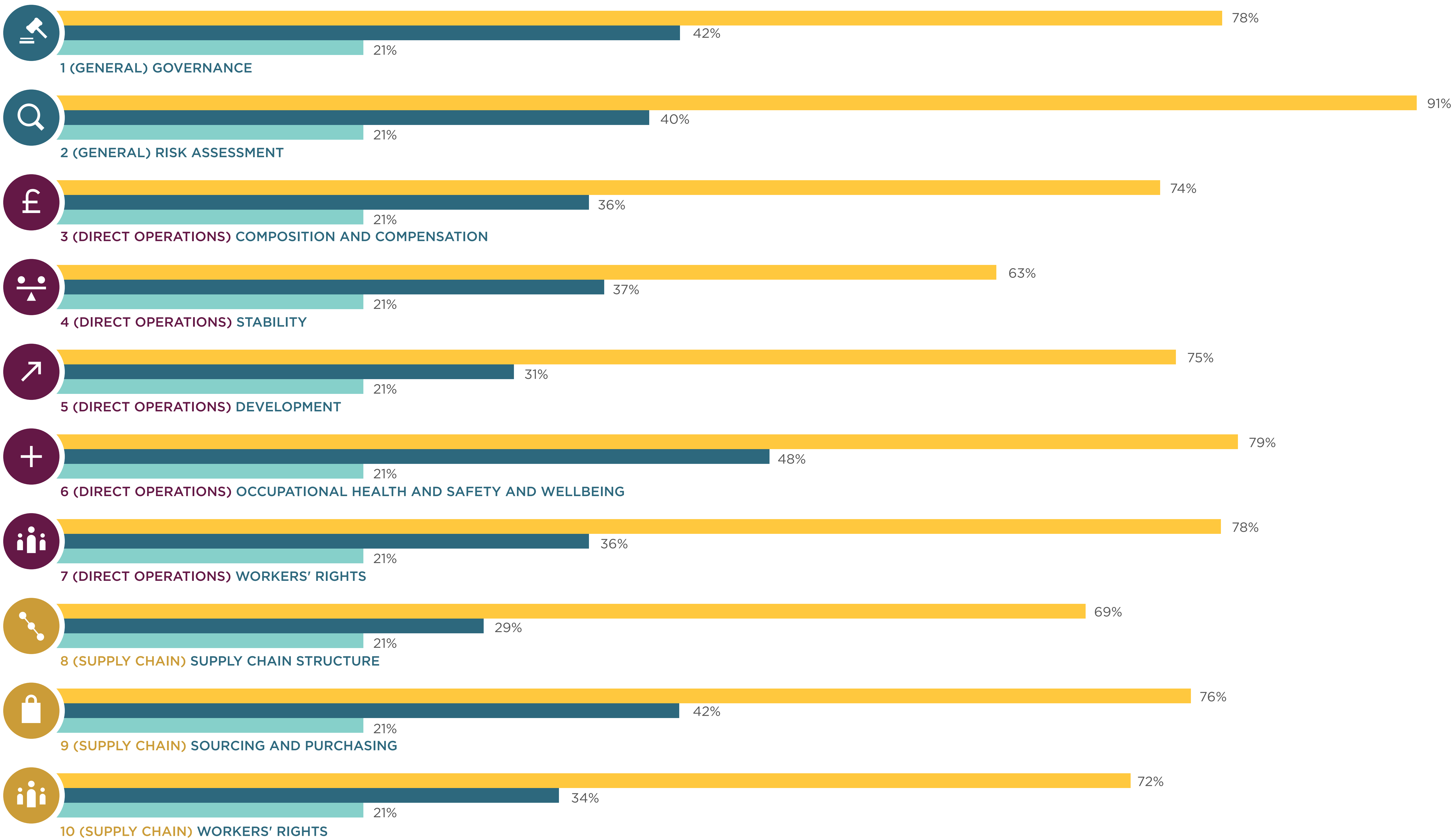
Companies can choose to make more data available publicly however. In 2019, 32 per cent of data submitted was done so under the "public" option.

Private data

For all questions which are not marked as "mandatory public", companies have the choice whether they submit their answer publicly or privately.

Data submitted privately is only available to WDI investor signatories to help target their engagement activities on workforce issues with companies they invest in.

Percentage of answers that were made public by survey section



The level of information made public in 2017 is the same for each section of the survey because in that year, companies could only choose to make their whole response private or public. 7 out of the 34 companies decided to submit their whole response publicly.

Photo by Wynand van Poortvliet on Unsplash

Data collected by the WDI versus data already publicly available

To demonstrate the WDI's commitment to publicly reported workforce data in 2019, 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 78 non-responding companies.

By comparing how complete each section of the survey was for these 78 to the 118 responders, we were able to determine how much more information participating companies were publishing through the WDI than is traditionally made available online (see pages 26-27). This research revealed that companies who complete the WDI survey are making 23 per cent more data available than those who do not complete the survey.

Sector trends and public data

Consumer sectors (discretionary and staples) - covering anything from food and beverage to apparel and automobiles - are reporting more workforce data than other sectors.

Companies across all 11 sectors appear in the top quartile for the amount of information they provide to the WDI survey, but there are a number of sectors sharing less data, including Industrials, Financials and Information Technology. There is no clear trend that suggests one sector is reporting more data publicly, but sectors reporting low levels of information (Industrials and Financials) appear to be more reluctant to make data available through the public option too.

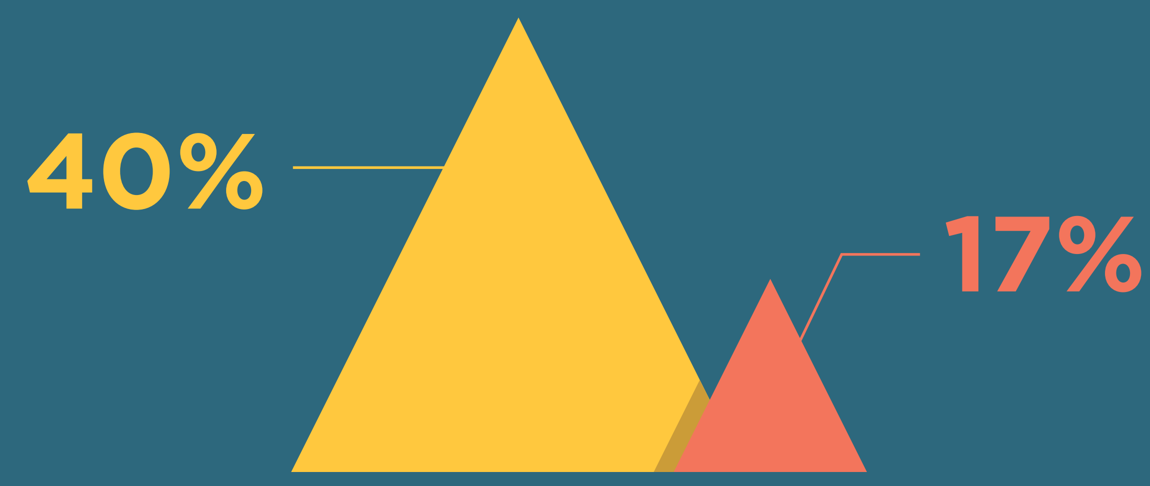
This suggests that companies from all sectors are capable of reporting workforce data, and that there do not appear to be any sector-based preconditions or limitations for high levels of completion. The more data companies disclose to the WDI survey the more data they tend to make public, which suggests an important correlation between how company confidence changes as it shares more data on workforce increases (see page 18-19).

Percentage of questions completed in each survey section

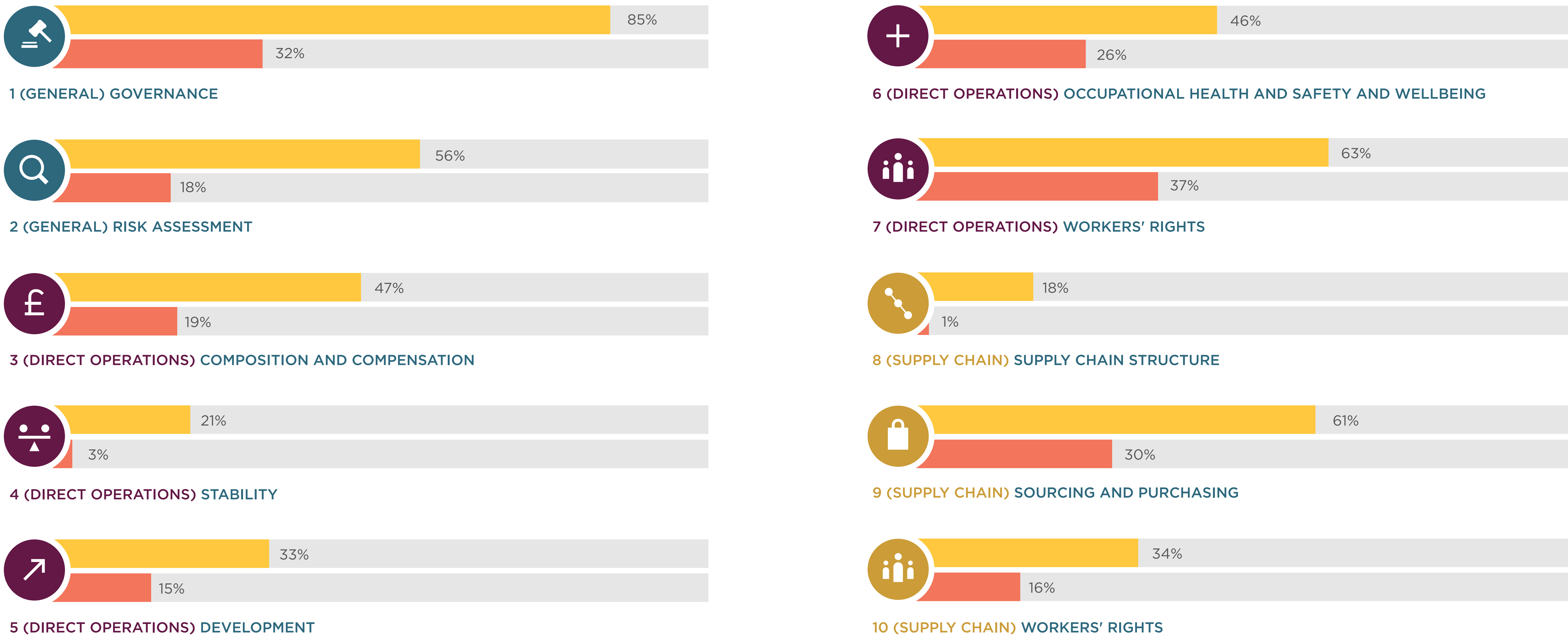
This graph shows how completing the WDI survey encourages companies to disclose more information than they would have done through sustainability and annual reports alone. This helps potential investors to learn more about companies' workforce and supply chain practices and helps companies to identify potential risks in their practices.

By companies participating in the WDI

By companies not participating in the WDI



Overall average survey completeness



Findings from the 2019 WDI data

1. Companies provide data on their workforce governance structures, but share limited information on the internal accountability mechanisms

2. Companies are reluctant to provide data on staff turnover

3. The concept of a Living Wage is not universally understood by companies

4. Companies are willing to submit more data against workforce metrics for permanent employees than for their contingent workforce

5. Companies do not appear to be collecting detailed data relating to social dialogue mechanisms, undermining their ability to monitor labour relations

6. Companies generally have in place policy-level commitments on responsible sourcing and supply chain workers' rights but are less able to provide data on how these commitments are implemented

FINDING 1

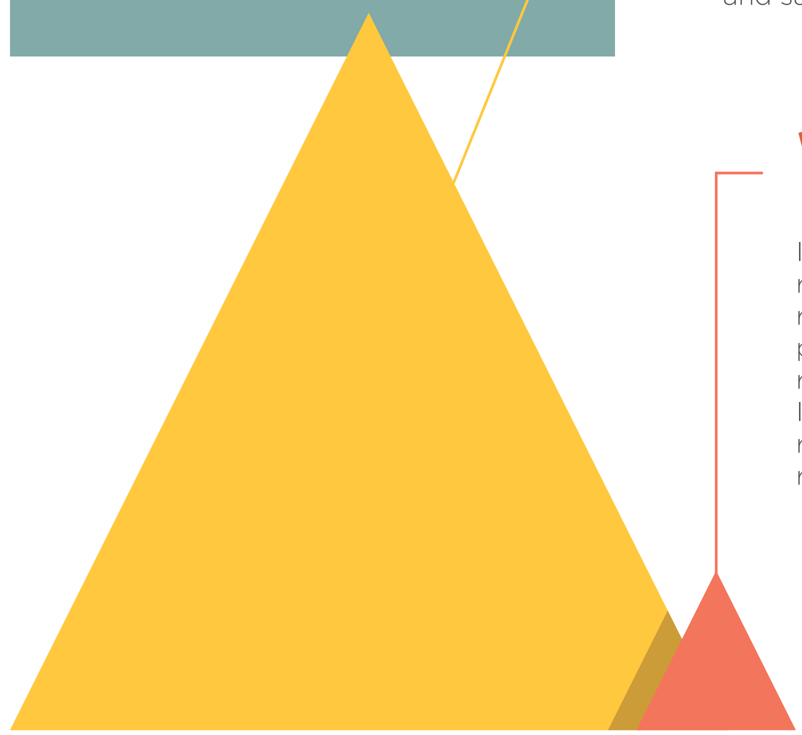
Companies provide data on their workforce governance structures, but share limited information on internal accountability mechanisms

Governance mechanisms provide a framework to manage, organise and direct workforce operations. Effective governance mechanisms ensure decision-makers are accountable for overall performance of a company.

Companies responded to the governance section questions better than any of the other WDI themes in 2019. Most participating companies name the individual (or body) responsible for workforce matters; the workforce themes and areas they are responsible for; and the process for cascading responsibility from the highest level of accountability to others in the organisation, and back up the chain again.

Disclosure was also high when companies were asked to explain how they assess the performance of those responsible for workforce matters. This is important since performance assessment is an important element of governance regimes, ensuring those responsible for delivering positive business and social outcomes are accountable for delivering agreed targets and strategies.

However, although most companies reported using workforce-related key performance indicators (KPIs), the 2019 data highlights an important distinction, and potential gap, in the governance and performance management regimes of participating companies.
For instance:



63%

63 per cent of companies said performance measures were used primarily to assess the company's sustainability or non-financial performance (interestingly, no company reported the consequences of failing to meet these KPIs). The company's performance is usually reported in annual or sustainability reports, and typically, only against a subset of KPIs (such as health and safety or diversity).

14%

In contrast, 14 per cent of companies reported using KPIs to determine remuneration policies, linking performance with individual remuneration or bonus packages[7]. In these instances, performance is reported in the annual remuneration report.

Companies are using KPIs as a tool to incentivise, and ultimately shape, individual and collective behaviour in the organisation.

While the numbers are still low, the WDI can see a growing number of companies integrating workforce related issues into their financial incentive structures. This suggests that more companies recognise the centrality of workers to the success of the business, and are prepared to reward performance that is geared toward longer term timelines and generating positive outcomes for all stakeholders.

It is worth noting that 32 per cent of companies reported either little or no information regarding their approach to performance assessment on workforce issues[8].

Companies that are not actively involved in measuring their performance on key workforce topics may appear to lack sufficient oversight of workforce management and undermine the credibility of a company's commitments to workforce issues and their integration into the company's business plan.

Photo by Yunming Wang on Unsplash

FINDING 2

Companies are reluctant to provide data on staff turnover

All companies need a sound understanding of staff turnover as it provides a litmus test for a wider set of workforce issues, such as how effective a company is at retaining workers, improving worker satisfaction and inclusivity at work. This is essential from a financial perspective too, so that companies can anticipate and budget for the costs and investment associated with losing and hiring new workers.

Turnover rates are particularly insightful when they are reported by gender, age or seniority

This helps to identify strengths in retention strategies, but also alert companies to systemic issues affecting different groups of workers. Although the number of participating companies providing turnover data has increased since 2018, (with 67 per cent of companies disclosing a turnover rate aggregated across all workers) it decreases when companies are asked to report turnover by different worker groups.

This suggests that a large number of companies may not be systematically monitoring, or are prepared to share disaggregated turnover data.

Of the 118 participating companies:

53% reported by gender

34% reported by age

26% reported by seniority level

16% reported by contract type[9]

The data also suggests that companies are reluctant to share information regarding changes to turnover

For instance, when asked if turnover had changed since the last reporting period only 47 per cent of companies provided an explanation as to why the rate of turnover had changed over the previous 12 months and much of this data was evasive and unclear.

When asked if the company anticipated any changes to turnover in the next 12-24 months, 50 per cent of companies did not respond. Of those that did provide data, only 25 companies provided a clear and decisive indication of the likely change and the reasons for this.

The remaining companies were more ambiguous, with many citing external environmental conditions without explicitly stating the likely impacts to workers.

The responsibility of companies

At a time of unprecedented economic and environmental upheaval, dramatic changes to the size and composition of workforces are likely.

> **Leading companies should live up to their wider social responsibility by being transparent about potential changes to business models so that workers, unions and investors are well informed of the impact.**

Crucially, this provides stakeholders with the opportunity to work with companies to develop effective mitigation strategies to protect workers and their livelihoods.

FINDING 3

The concept of a Living Wage is not universally understood by companies

Decent wages and the fair distribution of pay throughout an organisation are essential for creating equitable and productive working environments. A company's approach to pay, particularly for those in lowest paid roles, can demonstrate its commitment to addressing systemic issues such as inequality.

A Living Wage is defined as a wage sufficient to meet the basic standards of living, which will vary by country and local living standards. This is a well-established concept and currently used by a growing number of benchmarks globally[10]. However, progress on a universally accepted calculation has yet to be reached or endorsed by an international body like the International Labor Organisation (ILO).

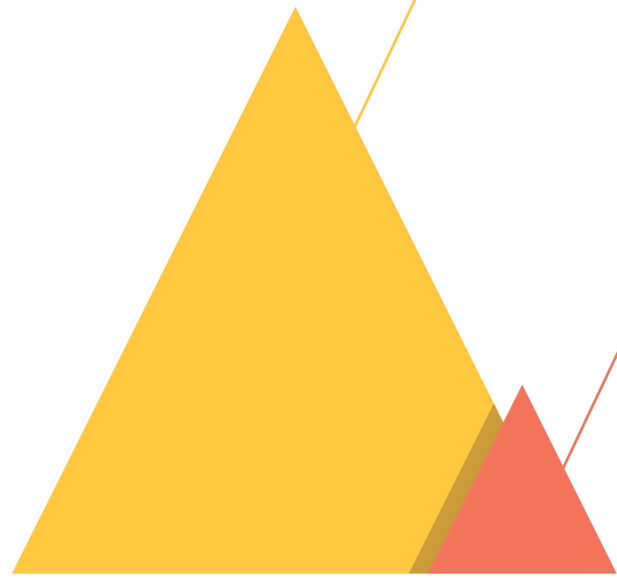
In 2019, much like previous years, company responses suggest confusion over the concept of a Living Wage with many companies not fully understanding how it differs from legal minimum wage requirements. While 33 per cent of companies (from 12 different geographies) reported paying a Living Wage in all their global operations, many of these companies referred only to local minimum wages requirements. Some companies go further to suggest that the concept of Living Wages does not exist outside of the UK.

With 40 per cent of companies choosing not to respond when asked if they paid a Living Wage to workers in their direct operations, it can be inferred that companies are reluctant to disclose whether they pay these rates.

FINDING 4

Companies are willing to submit more data against workforce metrics for permanent employees than for their contingent workforce

Non-standard forms of employment that rely on temporary contracts, non-guaranteed hours, and third-party contractors have increased in recent years[11]. Yet, the amount of data available on this growing part of the workforce is often low.



75%

75 per cent of companies disclosed the percentage of their direct operations workforce engaged on a permanent contract.

25%

However, only 25 per cent disclosed the percentage of workers on non-guaranteed or short hour contracts.

While contingent or temporary work for some workers can provide higher rates of pay and more flexibility, it often offers limited job security, in-work benefits and training opportunities.

As media reports have exposed, contract workers are more vulnerable than permanent workers, with many without access to sick-leave or medical benefits[12]. In some sectors, such as healthcare and food distribution, there are contract workers who have also been designated key workers due to the critical role they play in ensuring our societies can continue to operate. Companies' treatment of these workers is now firmly in the spotlight.

Recognising the vulnerabilities of some temporary contract workers (whether engaged directly by the company or a third party), the WDI survey asks companies to disclose data against various workforce metrics for both their contingent workforce and their employees.

Percentage of companies disclosing workers they have by contract type:

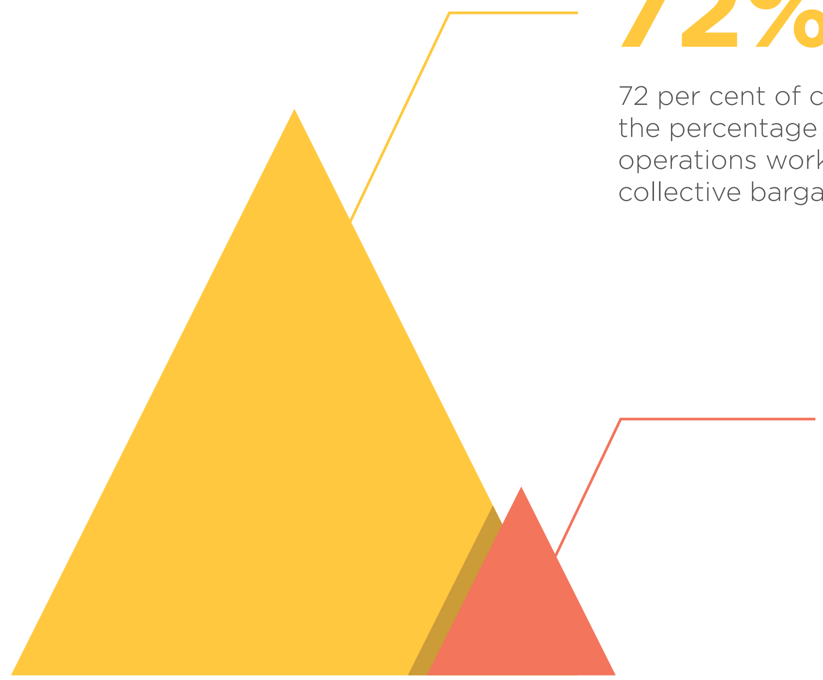
Permanent	Temporary
89%	78%
Non-guaranteed or short hours	**Third party**
30%	39%

Despite reporting wide use of contingent workers, only 9 per cent of companies disclose separate training data for these workers. It is difficult to determine whether training opportunities are limited for non-permanent employees or if companies are not collecting data in this format.

FINDING 5

Companies do not appear to be collecting detailed data relating to social dialogue mechanisms, undermining their ability to monitor labour relations

Freedom of association and collective bargaining are fundamental rights at work and essential mechanisms for maintaining good labour relations. Workers must also have access to a grievance mechanism(s) to raise concerns and enable access to a solution if abuses do occur. Companies should be monitoring workers' access to these rights to prevent abuses and ensure that issues are addressed promptly before they lead to industrial relations disputes, operational disruption and reputational damage.



72%

72 per cent of companies disclosed the percentage of their direct operations workforce covered by collective bargaining agreements

27%

Only 27 per cent provided a geographic breakdown of coverage by location (by country or region).

This is a significantly lower rate of disclosure than that of companies providing a location-by-location breakdown for their direct operations.

The average number of operating locations disclosed was 32.

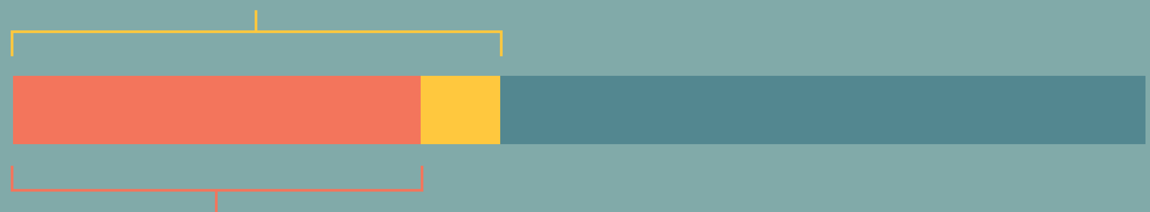
The average number of locations for which companies provided the percentage of collective bargaining coverage was just three.

Only five companies gave the rate of collective bargaining coverage for over 40 per cent of their direct operating locations.

The vast majority of companies (97 per cent) disclosed a policy commitment to provide a grievance mechanism

94 per cent provided details of their grievance mechanism(s).

Notably, less than half of companies revealed the number of grievances raised by direct operations workers (48 per cent) during the reporting period



Only 74 per cent of these also disclosed the number of grievances resolved

53 per cent provided data on how they measure the effectiveness of their grievance mechanism(s) so that it aligns with the UN Guiding Principles on Business and Human Rights (UNGPs).

> If workers do not trust the available grievance mechanism, this undermines its functionality and the prospect of resolving grievances and providing workers with access to remedy.

This low rate of disclosure is concerning given that 18 companies referred to "line managers" and 24 to their whistleblowing process when providing details on their grievance mechanism(s) indicating that careful monitoring is required to ensure that such mechanisms are indeed legitimate, accessible, predictable, equitable, transparent, and compatible with human rights within the meaning of the UNGPs.

Photo by Arron Choi on Unsplash

FINDING 6

Companies generally have in place policy-level commitments on responsible sourcing and supply chain workers' rights, but are less able to provide data on how these commitments are implemented

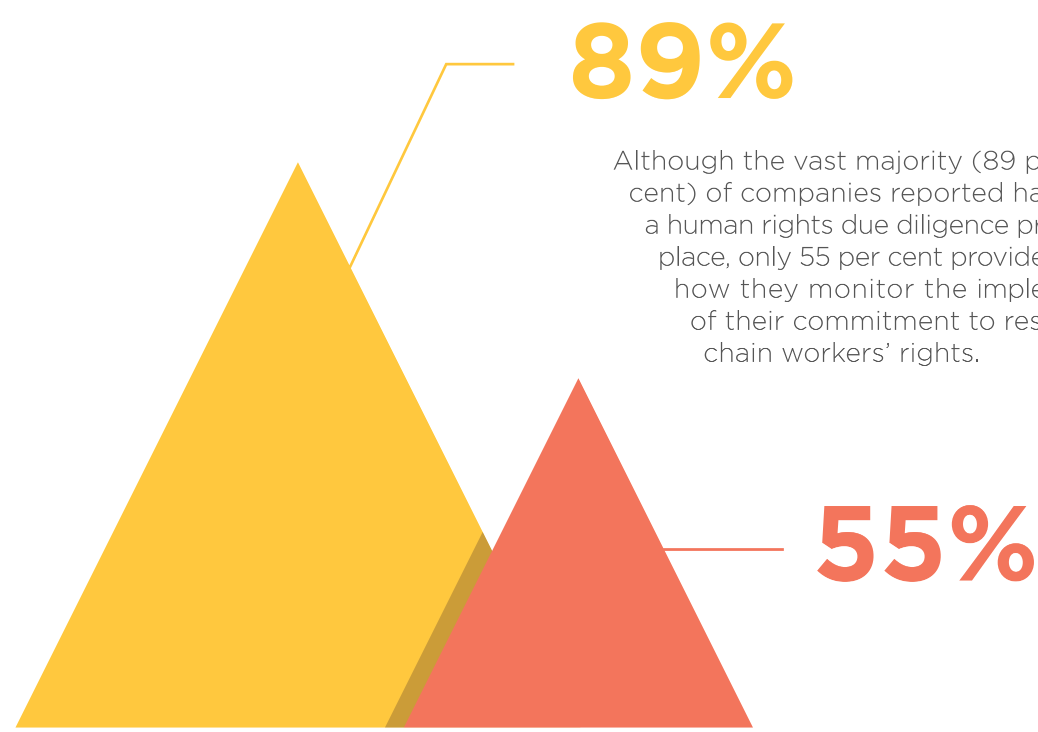
Companies have a responsibility to respect the human rights of their workforce; from preventing workplace discrimination and harassment to safeguarding workers' rights and providing a safe working environment. This responsibility should be integrated into every aspect of company strategy, including how goods and services are sourced. For example, the sourcing strategies of large companies can significantly impact on their suppliers' ability to provide decent working conditions for their workforce. Companies should commit to respecting supply chain workers' rights and monitor the implementation of these commitments by regularly reviewing their own sourcing practices as well as supplier labour standards.

79 per cent have a public commitment to respect key supply chain workers' rights

90 per cent have a responsible sourcing policy

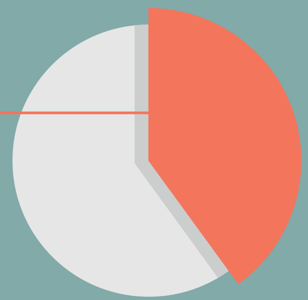
In 2019, 79 per cent of companies reported that they had a public commitment to respect key supply chain workers' rights, such as freedom of association and collective bargaining, and access to a grievance mechanism. A similarly high number of companies (90 per cent) reported that they have a responsible sourcing policy[13].

However, the number of companies providing data declines as companies are asked to provide data on how they implement these policy commitments; for example, providing detail on how they monitor whether suppliers meet these contractual commitments to respect workers' rights, and assess the impact of company sourcing practices.



Although the vast majority (89 per cent) of companies reported having a human rights due diligence process in place, only 55 per cent provided data on how they monitor the implementation of their commitment to respect supply chain workers' rights.

Companies' responses on sourcing behaviour and practices



Only 43 per cent of companies disclosed data when asked if they were assessing the impact of their sourcing behaviour on the company's ability to meet responsible sourcing and workers' rights commitments. Here, most companies referred to supplier audits.

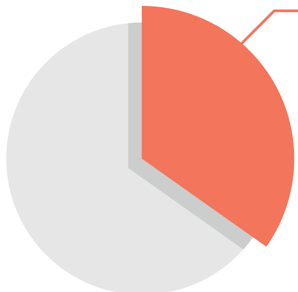
15

Only 15 companies suggest they critically reflect on the limitations of supplier audits, or disclosed whether non-conformance issues are evaluated as part of a wider internal assessment, to identify drivers of supplier non-conformance within the company's own sourcing practices.

4

Only four companies provided examples of how they have, or are currently, changing sourcing practices as a result of an internal assessment such as a human rights due diligence or a procurement practice review.

Disclosing data resulting from the steps of a human rights due diligence process



Only 30 per cent of companies reported whether they had identified any risks to workers' rights in their tier one supply chains, even to report that none were identified.

The identification of risks is a crucial step to ensure that risks can be mitigated so this low level of disclosure is concerning.

Notably few companies gave information on a specific risk or negative impact (for example, identifying the country in which the risk or impact was identified or the worker demographic at risk) which limits stakeholders' ability to assess whether steps undertaken to mitigate the risks to human rights are appropriate.

Nonetheless, 30 per cent of companies did disclose steps taken in response to identified risks to supply chain workers' rights.

From the WDI data it is apparent that the onus is typically on the supplier to undertake corrective action and address non-conformance with the supplier codes of conduct although the response of five companies is indicative of a more collaborative approach by, for example, working with the supplier to help them attain the requisite standards.

Companies that completed the WDI Survey in 2019 and their responses in 2018 and 2017

★ These companies provided the most data to the WDI survey (or came in the top ten per cent in terms of the completeness of their response)

Company	2018	2017	Country	Sector
Adidas	Responded	Not requested	Germany	Consumer Discretionary
AGL Energy	Responded	Not requested	Australia	Utilities
AIA Group	Responded	Not requested	China	Financials
Airbus	Responded	Not requested	France	Industrials
Anglo American	Responded	Responded	UK	Materials
Ansell	Responded	Not requested	Australia	Health Care
ASML Holding	Responded	Not requested	Netherlands	Information Technology
Assa Abloy	Not requested	Not requested	Sweden	Industrials
ABF	Responded	Responded	UK	Consumer Staples
AstraZeneca	Responded	Responded	UK	Health Care
AT&T	Responded	Not requested	USA	Communication Services
Atos	Responded	Not requested	France	Information Technology
BAE Systems	Responded	No response	UK	Industrials
Barclays	No response	No response	UK	Financials
Bayer	No response	Not requested	Germany	Health Care
BBVA	Not requested	Not requested	Spain	Financials
BCE	Responded	Responded	Canada	Communication Services
Berkeley Group	No response	Not requested	UK	Consumer Discretionary
★ BHP	Responded	Responded	UK	Materials
BMW	No response	Not requested	Germany	Consumer Discretionary
BNP Paribas	Responded	Not requested	France	Financials
Brambles Limited	No response	Not requested	Australia	Industrials
★ BAT	Responded	Responded	UK	Consumer Staples
British Land	Responded	Responded	UK	Real Estate
BT	Responded	Responded	UK	Communication Services
Burberry	Responded	Responded	UK	Consumer Discretionary
CN	Responded	Responded	Canada	Industrials
CPR	Responded	Not requested	Canada	Industrials
Capgemini	No response	Not requested	France	Information Technology
Centrica	Responded	Responded	UK	Utilities
Cisco	Responded	Not requested	USA	Information Technology
CNH Industrial	No response	Not requested	Netherlands	Industrials
Commerzbank	Responded	Not requested	Germany	Financials
Compass Group	Responded	Responded	UK	Consumer Discretionary
ConvaTec	Responded	Not requested	UK	Health Care
Cranswick	Responded	Not requested	UK	Consumer Staples
Croda International	No response	Not requested	UK	Materials
★ Dexus	No response	Not requested	Australia	Real Estate
Direct Line	Responded	Not requested	UK	Financials
Dominion Energy	Not requested	Not requested	USA	Utilities
★ Enel	Responded	Not requested	Italy	Utilities
Eni	No response	Not requested	Italy	Energy
Epiroc	Not requested	Not requested	Sweden	Industrials
Essity	Not requested	Not requested	Sweden	Consumer Staples
Evonik	Not requested	Not requested	Germany	Materials
Evraz	Not requested	Not requested	Russia	Materials
Ferguson	Responded	Responded	UK	Industrials
Fujitsu	No response	Not requested	Japan	Information Technology
General Motors	No response	Not requested	USA	Consumer Discretionary
GlaxoSmithKline	Responded	Responded	UK	Health Care
Greggs	No response	Not requested	UK	Consumer Discretionary
H&M	Responded	Responded	Sweden	Consumer Discretionary
Hargreaves Lansdown	Responded	Not requested	UK	Financials
HSBC	Responded	Responded	UK	Financials
Iberdrola	Not requested	Not requested	Spain	Utilities
IHG	Responded	No response	UK	Consumer Discretionary
★ Imperial Brands	No response	No response	UK	Consumer Staples
★ Inditex	Responded	Responded	Spain	Consumer Discretionary
ING	Responded	Not requested	Netherlands	Financials
Intel	Responded	Not requested	USA	Information Technology
International Consolidated Airlines Group	Responded	Responded	UK	Industrials
ITV	No response	Not requested	UK	Communication Services
JP Morgan Chase	Responded	Not requested	USA	Financials
Jupiter Asset Management	Not requested	Not requested	UK	Financials
★ Kering	Responded	Not requested	France	Consumer Discretionary
Kingfisher	No response	Not requested	UK	Consumer Discretionary
KPN	Not requested	Not requested	Netherlands	Communication Services
Landsec	Responded	Responded	UK	Real Estate
★ Lloyds Banking Group	Responded	No response	UK	Financials
Louis Vuitton	Responded	Not requested	France	Consumer Discretionary
ManpowerGroup	Not requested	Not requested	USA	Industrials
Mastercard	Responded	Not requested	USA	Information Technology
Microsoft	Responded	Responded	USA	Information Technology
Mondi	Responded	Responded	UK	Materials
MTN Group	No response	Not requested	South Africa	Communication Services
National Grid	No response	No response	UK	Utilities

Nestlé	Responded	Responded	Switzerland	Consumer Staples
Nokia	Responded	Not requested	Finland	Information Technology
Orange	Responded	Not requested	France	Communication Services
Pearson	Responded	Not requested	UK	Communication Services
Persimmon	Responded	Not requested	UK	Consumer Discretionary
Philips	Responded	Not requested	Netherlands	Health Care
Prudential	Responded	Not requested	UK	Financials
★ Reckitt Benckiser	Responded	No response	UK	Consumer Staples
Relx	Responded	Responded	UK	Industrials
Rio Tinto	No response	No response	UK	Materials
Rolls-Royce Holdings	Responded	No response	UK	Industrials
RBS	Responded	Responded	UK	Financials
RWE	No response	Not requested	Germany	Utilities
Sainsbury's	Responded	Responded	UK	Consumer Staples
Saint Gobain	Responded	Responded	France	Industrials
Sanofi	Responded	Not requested	France	Health Care
Schneider Electric	Responded	Not requested	France	Industrials
SEGRO	Responded	Not requested	UK	Real Estate
SGS	No response	Not requested	Switzerland	Industrials
Sodexo	Responded	Not requested	France	Consumer Discretionary
South32	No response	Not requested	Australia	Materials
★ SSE	Responded	Responded	UK	Utilities
St. James's Place	No response	Not requested	UK	Financials
★ Standard Chartered	Responded	Responded	UK	Financials
Taylor Wimpey	Responded	Not requested	UK	Consumer Discretionary
Telstra	Responded	Not requested	Australia	Communication Services
Tesco	No response	No response	UK	Consumer Staples
The Toronto-Dominion Bank	No response	Not requested	Canada	Financials
Toyota Motor	Responded	Not requested	Japan	Consumer Discretionary
Tyson Foods	No response	Not requested	USA	Consumer Staples
★ Unilever	Responded	Responded	UK	Consumer Staples
United Utilities	Responded	Not requested	UK	Utilities
UPM-Kymmene	No response	Not requested	Finland	Materials
Vale	Not requested	Not requested	Brazil	Materials
Valeo	No response	Not requested	France	Consumer Discretionary
Veolia	Responded	Not requested	France	Utilities
Vinci	No response	Responded	France	Industrials
Volkswagen (VW)	Responded	Not requested	Germany	Consumer Discretionary
Westpac	Responded	Not requested	Australia	Financials
Wood Group	Responded	Not requested	UK	Energy
Woolworths Group	No response	Not requested	Australia	Consumer Staples
WPP	Responded	No response	UK	Communication Services

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5. The WDI sectors were identified based on an assessment of the most commonly used industry standards
6. Ibid
7. 14% of companies reporting using KPIs related to the direct operations to determine remuneration policies; 9% of companies reported using supply chain related KPIs to determine remuneration.
8. 32% companies reported little or no information on their approach in the direct operations; 40% of companies reported little or no information on their approach in the supply chain.
9. The WDI survey requests data on permanent, temporary, non-guaranteed and third party contract types.
10. Global Living Wage Coalition. What is a Living Wage? (2011) Available online at: https://www.globallivingwage.org/about/what-is-a-living-wage/
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13. It should be noted that companies provided this information in a variety of ways: from dedicated policy commitments on responsible sourcing, to sections or paragraphs in sustainability reports or supplier sourcing standards. A number of companies provided their supplier code of conduct, which in most cases simply outlined expectations of suppliers but did not contain any information on the company's responsibilities with regard to sourcing practices.

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Disclaimer

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