

## CHECKLIST

This guidance document is to help companies understand the steps to prepare and complete the self-assessment. It is recommended that large companies begin these steps 1-2 weeks in advance to allow sufficient time to form your team and gather relevant data.

- ✓ **1. Designate a lead contact** to fill in the assessment on behalf of your company. This person will lead on coordinating with other teams to gather relevant information, create and manage your company log-in to the LGBTIQ+ Gap Tool, complete the assessment online, and share results within the company.
- ✓ **2. Identify other team members** to contribute to the assessment process. The tool covers company policies and practices related to leadership, workplace, marketplace, and community. This means you might need information from colleagues in Procurement; Human Resources; Diversity and Inclusion; Corporate Social Responsibility; Marketing; Product and Research Development, and Community or Government Relations.
- ✓ **3. Prepare to take the assessment.** Prior to starting the assessment, download this pdf and share among your assessment team. Gather relevant data and reports to complete the assessment. Pilot companies reported an average of 2-3 hours to prepare to take the assessment.
- ✓ **4. Complete the assessment online.** Use the information gathered by the assessment team to fill in the online assessment. Your answers will be saved as you go, and you can always come back and complete the assessment later. Pilot companies reported an average of 2-3 hours to complete the assessment.
- ✓ **5. Receive your results.** The PGLE tool platform will produce a results document that can be downloaded and shared. You can also download your company's responses to all questions. Results include an overall score, as well as progress across different approaches to women's empowerment. We encourage you to review results as a team to discuss strengths and opportunities, and to develop an action plan.
- ✓ **6. Consult relevant resources** to strengthen your approach. The tool will point you to resources that can support you in taking next steps.
- ✓ **7. Revisit the tool** to measure your progress.

Thank you for using the UN LGBTIQ+ Standards Gap Analysis Tool on behalf of your company and for taking this critical step to address women's empowerment!

# LGBTIQ+ Tool: Questionnaire

## 1. Does your company have leadership commitment and support for the rights of LGBTIQ+ people?

- No**, our company currently does not have leadership commitment and support, but:
  - We are interested in learning more.
  - We plan to take steps in the next year.
  - Some of the country offices or business units have taken steps.
  - None of the above.
- Yes**, our company has leadership commitment and support for the rights of LGBTIQ+ people.

### Commitment

- Has circulated an internal communication(s) and/or informal acknowledgement of the relevance of the rights of LGBTIQ+ people from senior leadership
- Has released a public written statement outlining our company's policy commitment to the rights of LGBTIQ+ people from senior leadership
- Has publicly expressed support for the UN Standards of Conduct (e.g. Partnership for Global LGBTIQ+ Equality — Commit to the Standards)

### Implementation

- Has adopted an organization-wide strategy and policy on LGBTIQ+ people endorsed by senior leadership
- Disseminates communications from senior leadership on addressing all 5 areas covered by the UN Standards of Conduct for Business on Tackling Discrimination against LGBTIQ+ people
- Senior leadership communicates their commitment and support for the rights of LGBTIQ+ people:
  - To employees
  - To other stakeholders (potential employees, suppliers, partners, etc.)
  - Addresses diversity within the LGBTIQ+ community, as part of senior leadership messaging.
- Provides frequent engagement opportunities for LGBTIQ+ employee resource groups

(ERGs) and LGBTIQ+ civil society organizations (CSOs) with senior leadership

Promotes company commitments to the rights of LGBTIQ+ people in public forums/events, with representation from senior leadership

### Measurement

Includes time-bound, measurable goals and targets in relation to the actions of senior leadership in the LGBTIQ+ strategy and policy

Has adopted formal accountability mechanisms to ensure senior leadership participation in progress in implementation and achieving goals of the strategy

### Transparency

Reports to the board on progress made and outcomes of strategy commitments and targets

Shares statements from leadership supporting the rights of LGBTIQ+ people, publicly

Reports publicly to company stakeholders on leadership participation in events supporting the rights of LGBTIQ+ people

N/A: Not desirable due to country context

## 2. Does your company have a policy commitment to meet its responsibility to respect human rights (e.g., a human rights, non-discrimination and/or equal opportunity policy), expressly including the rights of LGBTIQ+ people?

**No**, our company currently does not have a policy commitment expressly including the rights of LGBTIQ+ people, but:

We are interested in learning more.

We plan to take steps in the next year.

Some of the country offices or business units have taken steps.

None of the above.

**Yes**, our company has a policy commitment to meet its responsibility to respect human rights, expressly including the rights of LGBTIQ+ people and/or explicitly referring to sexual orientation, gender identity and expression and sex characteristics.

## Commitment

- Has an organization-wide policy that has explicit references to the rights of LGBTIQ+ people as part of a broader corporate policy, or a set of policies on human rights, non-discrimination and/or equal opportunity, specifically including:
  - Sexual orientation, including lesbian, gay and bisexual people
  - Gender identity, including trans people
  - Sex characteristics, including intersex people
- Has an organization-wide policy that has explicit references to the rights of LGBTIQ+ people in a stand-alone document
- Has an organization-wide policy that has explicit references to all 5 areas of the UN Standards of Conduct for Business on Tackling Discrimination against LGBTIQ+ people
- Has an organization-wide policy that has explicit references to the rights of LGBTIQ+ people that:
  - Was developed in consultation with LGBTIQ+ employees
  - Was developed in consultation with external stakeholders, including LGBTIQ+ civil society organizations
- Has policies on human rights, non-discrimination and/or equal opportunities that do not refer explicitly to LGBTIQ+ people and/or to sexual orientation, gender identity and expression and sex characteristics

## Implementation

- Communicates organization-wide policy to:
  - All employees
  - Other stakeholders (potential employees, suppliers, partners, etc.)
- Conducts trainings with all employees, including managers, on the policy
- Provides access to confidential grievance and resolution mechanisms for employees to report concerns and gaps in the implementation of the policy
- Some country offices or units have not taken any steps in relation to this question, as a result of the recommendations of a risk assessment based on the local context

### Measurement

- Includes time-bound, measurable goals and targets with responsibility assigned to designated roles within the company on implementation of the policy
- Includes accountability mechanisms to ensure progress in implementation and achieving goals of the strategy and policy
- Tracks progress on implementation of goals and targets in the organization-wide LGBTIQ+ policy
- Monitors compliance with human rights standards, and tracks violations of commitments and policies to respect the human rights of LGBTIQ+ people

### Transparency

- Reports publicly on progress on and violation of commitments and policies to respect the human rights of LGBTIQ+ people.
- Reports publicly to company stakeholders the total number of incidents of discrimination (related to the rights of LGBTIQ+ people) and corrective actions taken.
- Reports to the board the total number of incidents of discrimination (related to the rights of LGBTIQ+ people) and corrective actions taken.

### 3. Does your company conduct human rights due diligence (HRDD) to identify, prevent and mitigate adverse impacts on the rights of LGBTIQ+ people?

- No**, our company currently does not conduct HRDD, or does conduct HRDD, but does not currently include the rights of LGBTIQ+ people in the HRDD process, but:
  - We are interested in learning more.
  - We plan to take steps in the next year.
  - Some of the country offices or business units have taken steps.
  - None of the above.
- Yes**, our company conducts HRDD for actual and potential negative impacts on the human rights of LGBTIQ+ people

### Commitment

- Has a policy or public written statement to conduct HRDD that includes actual and

potential negative impacts on the human rights of LGBTIQ+ people, specifically addressing:

- Sexual orientation, including lesbian, gay, and bisexual people
- Gender identity and expression, including trans people
- Sex characteristics, including intersex people

### **Implementation**

- Has a strategy to identify and assess actual and potential impacts on the human rights related to:
  - Sexual orientation and faced by lesbian, gay and bisexual people
  - Gender identity and expression, and faced by trans people
  - Sex characteristics, and faced by intersex people
- Has a strategy to identify and assess actual and potential impacts on the rights of LGBTIQ+ people as a result of business activities or through business relationships:
  - That is specific to their industry
  - That is specific to their local contexts of operations
  - That is specific to their set of partners and stakeholders
- Engages with external stakeholders including LGBTIQ+ civil society organizations, as part of the HRDD process.
- Integrates the findings of the assessment and takes steps to prevent these impacts from occurring, to mitigate their likelihood and severity, to use leverage within business relationships and to provide remedy where impacts nevertheless occur

### **Measurement**

- Monitor and tracks the effectiveness of the processes for assessing and addressing these impacts

### **Transparency**

- Reports publicly on the actual and potential impacts that have been identified

- Reports publicly about how the business addresses impacts and risk

#### 4. Does your company have an effective grievance, remediation, resolution, and non-retaliation process?

**No**, our company currently does not have remediation mechanisms, or our company does have remediation mechanisms, but do not explicitly address the specific needs of the LGBTIQ+ community, but:

- We are interested in learning more.
- We plan to take steps in the next year.
- Some of the country offices or business units have taken steps.
- None of the above.

**Yes**, our company has grievance, remediation, resolution, and non-retaliation mechanisms to resolve any adverse human rights impacts they might have caused or contributed to, which address the specific needs of the LGBTIQ+ community.

##### Commitment

- Has a policy or public written statement that details the grievance, remediation, resolution, and non-retaliation process, which is inclusive of LGBTIQ+ people

##### Implementation

- Has grievance, remediation, resolution, and non-retaliation mechanisms in place for employees to report discrimination or other concerns, that are inclusive of and accessible to LGBTIQ+ people
- Offers confidential and effective grievance, remediation, resolution, and non-retaliation mechanisms to
- Own employees
  - Employees of suppliers and other business partners
  - Community stakeholders
- Develops grievance, resolution, and non-retaliation mechanisms as it relates to the rights of LGBTIQ+ people in consultation with
- Employee Resource Groups (ERGs), including LGBTIQ+ ERGs

External LGBTIQ+ organizations

Ensures grievance mechanisms:

Are legitimate, accessible, predictable, equitable, transparent, rights-compatible, enable continuous learning, and are based on engagement and dialogue

Include protections for whistleblowers

Managed by an independent third party

Ensures employees, suppliers and the public are aware of how to access the grievance, remediation, resolution, and non-retaliation process

Trains teams involved in the grievance, remediation, resolution, and non-retaliation process in diversity and inclusion, specifically the rights of LGBTIQ+ people, so they are better able to deal with reports of discrimination

### Measurement

Collects and analyzes actual or potential adverse impacts identified in relation to LGBTIQ+ people

Collects and analyzes corrective actions taken (number of incidents) in relation to LGBTIQ+ people

### Transparency

Reports publicly on the total number of incidents in relation to LGBTIQ+ people

Reports on the corrective actions taken in relation to LGBTIQ+ people on a regular, predictable schedule

**5. Does your company have a non-discrimination and equal opportunity policy, either stand-alone or clearly included in a broader corporate policy, that explicitly includes sexual orientation, gender identity, gender expression, and sex characteristics?**

**No**, our company currently does not have a non-discrimination and equal opportunity policy, or our company does have a non-discrimination and equal opportunity policy, but it does not expressly

include sexual orientation, gender identity, gender expression, and sex characteristics, but:

- We are interested in learning more.
  - We plan to take steps in the next year.
  - Some of the country offices or business units have taken steps.
  - None of the above.
- Yes**, our company has a non-discrimination and equal opportunity policy that explicitly includes sexual orientation, gender identity, gender expression, and sex characteristics.

### Commitment

- Has a non-discrimination and equal opportunity policy that explicitly includes:
  - Sexual orientation, and lesbian, gay and bisexual people
  - Gender identity and gender expression, and trans people
  - Sex characteristics and intersex people
- Has a non-discrimination and equal opportunity policy that was informed by:
  - Internal expertise (including LGBTIQ+ employees and/or trade unions)
  - External expertise (including LGBTIQ+ organizations)

### Implementation

- Communicates policy/policies to:
  - All employees
  - Other stakeholders (potential employees, suppliers, partners, etc.)
- Conducts trainings with all employees, including managers, on the policy/policies
- Provides access to confidential grievance and resolution mechanisms for employees to report concerns related to noncompliance with the policy
- Has a voluntary self-identification in place across operations and avoids LGBTIQ+ staff being forced to reveal or conceal their identity/ status within the workforce.
- Has a policy to recognize the gender identity of transgender staff, customers and other stakeholders based on the self-identification of the person, regardless of whether this is reflected in official documents

Has a policy to provide support to and to protect the rights of transgender staff who are transitioning

Has a policy that requires company staff to respect the name, pronouns, terms and gender used by the person concerned

Has nondiscriminatory dress codes.

Some country offices or units have not taken any steps in relation to this question, as a result of the recommendations of a risk assessment based on the local context

### Measurement

Includes time-bound, measurable goals to track progress on LGBTIQ+ inclusion and non-discrimination initiatives

### Transparency

Reports publicly on progress, successes, and challenges of LGBTIQ+ inclusion and non-discrimination initiatives

Reports to the board on the number of Employee Resource Groups, ally programs, executive leadership programs, etc.

## 6. Does your company have an approach to ensure LGBTIQ+ equality in recruitment, professional development and promotion processes?

**No**, our company currently does not have an approach, but:

We are interested in learning more.

We plan to take steps in the next year.

Some of the country offices or business units have taken steps.

None of the above.

**Yes**, our company has an approach to ensure LGBTIQ+ equality in recruitment, professional development and promotion processes.

### Commitment

Has a stand-alone policy or a commitment embedded in a broader corporate policy on

non-discrimination and equal opportunity, that specifically addresses LGBTIQ+ equality in recruitment, professional development and promotion processes

Has a stand-alone policy or a commitment embedded in a broader corporate policy that includes professional development opportunities for LGBTIQ+ people and supports the building of a pipeline of qualified LGBTIQ+ people for management and senior leadership level positions

## Implementation

Forbids mandatory disclosure of sexual orientation, gender identity, gender expression, or sex characteristics in job applications or during interview processes

Takes proactive steps to attract and retain LGBTIQ+ staff at all levels

Ensures job descriptions and recruitment communications use inclusive language

Includes a non-discrimination clause in vacancies that explicitly includes sexual orientation, gender identity, gender expression, and sex characteristics

Engages top and middle management in ensuring effective compliance with fair recruiting, professional development and promotion practices

Has due diligence and remediation processes in place to identify and address violations of recruitment, professional development and promotion policies that are based on discrimination against LGBTIQ+ people

Offers mentoring and development programs with specific support for LGBTIQ+ people, including:

Development training

Leadership coaching

Access to professional networks

Specific programs to build the pipeline of qualified LGBTIQ+ people for management/senior leadership level positions

Talent development schemes specifically targeting LGBTIQ+ people, or leveraging of programs offered externally

Some country offices or units have not taken any steps in relation to this question, as a result of the recommendations of a risk assessment based on the local context

## Measurement

- Tracks employee recruitment, promotions, reasons for turnover and professional development while respecting confidentiality, privacy, data security, and ensuring a do-no-harm approach
- Has time-bound and measurable goals and targets on ensuring LGBTIQ+ equality in recruitment, professional development and promotion processes
- Has annual targets for trainings, rotational programs, educational opportunities, mentorship programs, and leadership coaching related to LGBTIQ+ inclusivity
- Tracks progress through engagement with and feedback from LGBTIQ+ Employee Resource Groups.

## Transparency

- Reports to the board on the number and rate of new employee hires, promotions and employee turnover, including disaggregated data based on self-reported gender and sexual orientation, as well as the reasons for turnover
- Reports publicly to company stakeholders on the number and rate of new employee hires, promotions and employee turnover, including disaggregated data based on self-reported gender and sexual orientation, as well as the reasons for turnover
- Reports publicly to company stakeholders on the progress made towards the goals and targets of the company on ensuring LGBTIQ+ equality in recruitment, professional development and promotion processes

## 7. Does your company have an approach to ensure equal compensation regardless of sexual orientation, gender identity, gender expression or sex characteristics?

- No**, our company currently does not have an approach to ensure equal compensation to all staff, that explicitly includes sexual orientation, gender identity, gender expression or sex characteristics but:
  - We are interested in learning more.
  - We plan to take steps in the next year.
  - Some of the country offices or business units have taken steps.
  - None of the above.
- Yes**, our company has an approach to ensure equal compensation that explicitly includes sexual orientation, gender identity, gender expression or sex characteristics.

### Commitment

Has a stand-alone policy or a commitment embedded in a broader corporate policy that explicitly addresses equal pay regardless of sexual orientation, gender identity, gender expression or sex characteristics

### Implementation

Has procedures in place to remediate pay inequalities (including working with unions, staff representatives and LGBTIQ+ Employee Resource Groups)

Assesses other financial benefits including insurance benefits, bonuses, and retirement contributions when reviewing compensation

Some country offices or units have not taken any steps in relation to this question, as a result of the recommendations of a risk assessment based on the local context

### Measurement

Undertakes an objective LGBTIQ+ pay gap audit or evaluation by internal or external parties at least every five years to ensure jobs of equal value are remunerated equally regardless of sexual orientation, gender identity, gender expression or sex characteristics

### Transparency

Publicly discloses to company stakeholders the overall ratio and ratio by employee level of basic salary and remuneration of all employees, including disaggregated data based on self-reported gender and sexual orientation

Reports to the board the overall ratio and ratio by employee level of basic salary and remuneration of all employees, including disaggregated data based on self-reported gender and sexual orientation

## 8. Does your company extend the same benefits to LGBTIQ+ staff, including in relation to their partners, spouses, children, and other dependents as granted to all other employees?

**No**, our company currently does not extend the same benefits to LGBTIQ+ staff, including in relation to their partners, spouses, children, and other dependents, but:

- We are interested in learning more.
- We plan to take steps in the next year.
- Some of the country offices or business units have taken steps.
- None of the above.
- Yes**, our company extends the same benefits to LGBTIQ+ staff, including in relation to their partners, spouses, children, and other dependents as granted to all other employees.

### Commitment

- Has a stand-alone policy or a commitment embedded in a broader corporate policy that ensures the same benefits for employees' partners, spouses, children, and other dependents, regardless of sexual orientation, gender identity, gender expression or sex characteristics
- Has a stand-alone policy or a commitment embedded in a broader corporate policy that recognizes the health, insurance and sanitation needs of LGBTIQ+ people
- Has a paid parental and/or family leave or caregiver policy that is inclusive of LGBTIQ+ employees

### Implementation

- Communicates policy/policies to:
  - All employees
  - Other stakeholders (potential employees, suppliers, partners, etc.)
- Provides the same benefits in relation to partners, spouses, children, and dependents, regardless of gender, sexual orientation, gender identity and expression and sex characteristics
- Has conducted a benefits audit/gap analysis in collaboration with relevant ERGs and/or external LGBTIQ+ groups as well as by engaging with employees to:
  - Review any gaps in benefits related to partners, spouses, children, and other dependents of LGBTIQ+ staff across its operations
  - Review whether benefits are unequally provided domestically
  - Review whether benefits are unequally provided internationally
  - Review if health, insurance, safety, and sanitation services and protections meet employee needs

- Has alternative solutions to address benefits gaps in relation to LGBTIQ+ staff, including in relation to their partners, spouses, children, and other dependents in countries where there are legal restrictions and/or gaps in the protection of LGBTIQ+ persons
- Offers affirmative transgender-inclusive healthcare benefits and removes all broad exclusions to coverage across plan offerings
- Provides options for private insurance packages that cover the specific health needs of LGBTIQ+ people, where these are not adequately covered by existing plans
- Some country offices or units have not taken any steps in relation to this question, as a result of the recommendations of a risk assessment based on the local context

### Measurement

- Has time-bound and measurable goals and targets on achieving equal benefits for LGBTIQ+ staff, including in relation to their partners, spouses, children, and other dependents
- Tracks or monitors gaps in benefits
- Tracks the types of health services, insurance, and sanitation services that are provided at the workplace
- Measures uptake of benefits disaggregated by gender and LGBTIQ+ status.

### Transparency

- Reports publicly to company stakeholders on gaps in benefits and corrective actions taken.
- Reports publicly to company stakeholders on the uptake or use of benefits by employees disaggregated by gender and LGBTIQ+ status.

## 9. To ensure an environment free of discrimination, violence and harassment, does your company have an approach to preventing, protecting against and eliminating discrimination, harassment (external or internal) and violence directed against LGBTIQ+ individuals?

- No**, our company currently does not have an approach to preventing, protecting against and eliminating discrimination, harassment and violence directed against LGBTIQ+ individuals, but:
  - We are interested in learning more.

- We plan to take steps in the next year.
- Some of the country offices or business units have taken steps.
- None of the above.
- Yes**, our company has an approach to preventing, protecting against and eliminating discrimination, harassment (external or internal) and violence directed against LGBTIQ+ individuals.

### Commitment

- Has a stand-alone policy or a commitment embedded in a broader corporate policy that states zero tolerance of all forms of violence at work (including while on business-related travel, in client relations, or business-related relocation) that explicitly includes LGBTIQ+ people. The policy explicitly addresses discrimination, violence and harassment based on:
  - Sexual orientation, including against lesbian, gay and bisexual people
  - Gender identity and expression, including against trans people
  - Sex characteristics, including against intersex people

### Implementation

- Communicates publicly their approach to ensuring an environment free of harassment, discrimination, and violence, explicitly including LGBTIQ+ people
- Communicates policy and/or commitment to:
  - All employees
  - Other stakeholders (potential employees, suppliers, partners, etc.)
- Works in collaboration with LGBTIQ+ ERGs and/or external LGBTIQ+ groups to identify and address gaps in the prevention of and response to discrimination, harassment or violence against LGBTIQ+ people.
- Provides regular training on zero tolerance of all forms of harassment, discrimination, and violence to all employees, that explicitly includes:
  - Sexual orientation and lesbian, gay and bisexual people
  - Gender identity and expression, and trans people
  - Sex characteristics and intersex people
- Assesses risks specific to LGBTIQ+ employees, whether domestically or internationally, analyzing travel exposures, developing commuting policies, and educating employees on

### safety risks

- Provides support or protection services to employees in relation to harassment, discrimination and violence, including intimate partner violence and ensures that services are explicitly inclusive of LGBTIQ+ employees
- Ensures that relocation practices for all staff, regardless of their sexual orientation, gender identity or sex characteristics, deliver awareness of any risks or other reduced rights considerations for LGBTIQ+ people, and provides guidance on those risks
- Provides safe and non-discriminatory access to bathrooms, changing rooms and other single-sex facilities, irrespective of gender identity, gender expression, sexual orientation, sex characteristics
- Some country offices or units have not taken any steps in relation to this question, as a result of the recommendations of a risk assessment based on the local context

### Measurement

- Tracks or monitors instances of discrimination, harassment or violence against LGBTIQ+ workers, whether they occur internally or externally

### Transparency

- Reports publicly to company stakeholders the total number of incidents of harassment, discrimination, and violence (related to the rights of LGBTIQ+ people) and corrective actions taken

## 10. Does your company have an approach to train staff to raise their awareness of human rights concerns faced by LGBTIQ+ people, and ensure they are aware of their responsibility to respect and uphold human rights?

- No**, our company currently does not have an approach to train staff to raise their awareness of human rights concerns faced by LGBTIQ+ people, but:
  - We are interested in learning more.
  - We plan to take steps in the next year.
  - Some of the country offices or business units have taken steps.
  - None of the above.

**Yes**, our company has an approach to train staff to raise their awareness of human rights concerns faced by LGBTIQ+ people, and ensure they are aware of their responsibility to respect and uphold human rights.

### Commitment

- Has a commitment to explicitly include references to the rights of LGBTIQ+ people in diversity and inclusion training and awareness-raising initiatives
- Develops awareness-raising and training programmes in consultation with:
  - Internal expertise (including LGBTIQ+ employees and/or trade unions)
  - External expertise (including LGBTIQ+ civil society organizations)

### Implementation

- Communicates policy and/or commitment to:
  - All employees
  - Other stakeholders (potential employees, suppliers, partners, etc.)
- Provides mandatory training, including on unconscious bias, aimed at helping to shape inclusive behaviours for staff and managers to raise awareness of human rights concerns faced by LGBTIQ+ people and ensure that they are aware of their responsibility under company policy to respect and uphold the rights of LGBTIQ+ people, which specifically includes:
  - Sexual orientation and lesbian, gay and bisexual people
  - Gender identity and expression, and trans people
  - Sex characteristics and intersex people
- Integrates gender identity and expression, sexual orientation and sex characteristics in professional development, skills-based or other leadership training that includes elements of diversity and/or cultural competency
- Training programs are developed in consultation with LGBTIQ+ ERGs and/or external LGBTIQ+ groups.
- Profiles internal LGBTIQ+ role models and brings in external role models, when appropriate, for talks, events or workshops.
- Protect the rights of transgender staff who are transitioning by providing training and guidance to managers and colleagues in respect to gender identity and gender expression

Some country offices or units have not taken any steps in relation to this question, as a result of the recommendations of a risk assessment based on the local context

### Measurement

Has time-bound and measurable goals and targets on reaching a high level of employee awareness of human rights concerns faced by LGBTIQ+ people and awareness of their responsibility to respect and uphold human rights

Tracks or monitors participation in diversity trainings that explicitly include LGBTIQ+ people

Tracks or monitors the level of awareness by employees of human rights concerns faced by LGBTIQ+ people and awareness of their responsibility to respect and uphold human rights

### Transparency

Reports publicly to company stakeholders in relation to progress towards meeting the goals and targets on employee awareness of human rights concerns faced by LGBTIQ+ people and awareness of their responsibility to respect and uphold human rights

Reports to the board the average number of training hours on non-discrimination and equal opportunity that specifically prohibits harassment and discrimination because of sexual orientation, gender identity, gender expression or sex characteristics

## 11. Does your company have an approach to ensure data and information related to the sexual orientation, gender identity, gender expression or sex characteristics of employees are kept confidential and secure?

**No**, our company currently does not have an approach to ensure data and information related to the sexual orientation, gender identity, gender expression or sex characteristics of employees are kept confidential and secure, but:

We are interested in learning more.

We plan to take steps in the next year.

Some of the country offices or business units have taken steps.

None of the above.

**Yes**, our company has an approach to ensure data and information related to the sexual orientation, gender identity, gender expression or sex characteristics of employees are kept confidential and secure.

### Commitment

- Has a commitment or policy to respect and support the right to privacy of all persons, including by keeping any information relating to the sexual orientation, gender identity, gender expression, or sex characteristics of individuals confidential and secure, and not revealing such information to third parties, including authorities, without the express authorization of the individual concerned
- Adopts policies to support and protect the rights of transgender staff who are transitioning, including allowing transgender employees to modify company records, including those related to their name, title, gender, appearance
- Adopts safety and security protocols to mitigate risks and to respond to incidents of breaches of confidentiality, privacy, data security in relation to data on sexual orientation, gender identity, gender expression, or sex characteristics

### Implementation

- Has a voluntary self-identification in place across operations and avoids LGBTIQ+ staff being forced to reveal or conceal their identity/ status within the workforce.
  - N/A Not desirable due to country context
- Ensures that personal data related to sexual orientation, gender identity, gender expression, and sex characteristics are encrypted and kept confidential except for instances where the express and explicit permission of the individual concerned is obtained.
- Ensures the appropriate data removal mechanisms, which allow LGBTIQ+ employees who have voluntarily self-identified their sexual orientation, gender identity, gender expression, or sex characteristics to request removal of such information from company data systems.
- Ensures changes to employee gender identity and pronoun selections are incorporated across all corporate systems.
- Some country offices or units have not taken any steps in relation to this question, as a result of the recommendations of a risk assessment based on the local context

### Measurement

- Tracks progress towards implementation of effective systems on data protection, safety, confidentiality, privacy and encryption of data relating to sexual orientation, gender identity,

gender expression, and sex characteristics.

Monitors incidents of LGBTIQ+ staff being forced to reveal or conceal their identity or LGBTIQ+ status within the workforce.

Monitors data breaches that include information relating to the sexual orientation, gender identity, gender expression, or sex characteristics of individuals to third parties, including authorities.

### Transparency

Informs individuals of any data breaches that include their information relating to sexual orientation, gender identity, gender expression, or sex characteristics.

Reports publicly on data breaches that include information relating to the sexual orientation, gender identity, gender expression, or sex characteristics of individuals to third parties, including authorities.

Reports on data in relation to sexual orientation, gender identity, gender expression, or sex characteristics in ways that do not violate LGBTIQ+ employees' right to privacy, to identify areas where LGBTIQ+ inclusion can be improved

## 12. Does your company take proactive measures to create a positive and affirmative environment in their organization so that LGBTIQ+ people feel included and valued in the workplace?

**No**, our company currently does not have an approach to create a positive and affirmative environment in their organization so that LGBTIQ+ people feel included and valued in the workplace, but:

We are interested in learning more.

We plan to take steps in the next year.

Some of the country offices or business units have taken steps.

None of the above.

**Yes**, our company takes proactive measures to create a positive and affirmative environment so that LGBTIQ+ people feel included and valued in the workplace.

### Commitment

Has committed to creating and maintaining a positive and affirmative environment in which LGBTIQ+ people feel included and valued in the workplace

## Implementation

- Has initiatives on an inclusive, positive, and affirmative work environment explicitly including:
  - Sexual orientation, including lesbian, gay and bisexual people
  - Gender identity and expression, including trans people
  - Sex characteristics, including intersex people
- Has an officially-sponsored Employee Resource Group (ERG) for LGBTIQ+ employees.
- Supports efforts by LGBTIQ+ employees to create their own informal staff groups and extend the same opportunities to them for extracurricular activities as they would to any other group.
- Demonstrates active role modeling, ensuring that some LGBTIQ+ employees are in positions of visibility and/or leadership.
- Designates employees responsible for LGBTIQ+ inclusion responsible for enforcing anti-discrimination policies and enacting diversity and inclusion commitments.
- Has ally program(s) in place to provide support and advocate for LGBTIQ+ employees in the workplace
- Some country offices or units have not taken any steps in relation to this question, as a result of the recommendations of a risk assessment based on the local context

## Measurement

- Includes time-bound and measurable goals on creating and maintaining a positive and affirmative environment in which LGBTIQ+ people feel included and valued in the workplace and monitors progress on meeting these targets
- Engages with LGBTIQ+ ERGs and/or external LGBTIQ+ organizations to assess and measure areas for where inclusive programs could be improved.

## Transparency

- Reports publicly on best practices for inclusion initiatives and on areas where progress could be improved to promote public discussions among peers on LGBTIQ+ inclusion.

**13. Does your company have an approach to identify, prevent, and mitigate risks to the human rights of LGBTIQ+ people in the marketplace (including suppliers or distributors, customers, and other business relationships)?**

- No**, our company does not currently have an approach to identify, prevent, and mitigate risks to the human rights of LGBTIQ+ people in the marketplace, but:
  - We are interested in learning more.
  - We plan to take steps in the next year.
  - Some of the country offices or business units have taken steps.
  - None of the above.
- Yes**, our company has an approach to identify, prevent, and mitigate risks to the human rights of LGBTIQ+ people in the marketplace.

**Commitment**

- Has a commitment or policy to identify, prevent, and mitigate risks to the human rights of LGBTIQ+ people in the marketplace (including suppliers or distributors, customers, and other business relationships)
- Has a supplier or distributor code of conduct that explicitly includes requirements on non-discrimination based on sexual orientation, gender identity and expression and sex characteristics

**Implementation**

- Assesses whether through their operations or business relations the company is causing or contributing to violence, bullying, intimidation, ill-treatment, incitement to violence, discrimination or other abuses against LGBTIQ+ people
- Ensures regular consultation with local LGBTIQ+ CSOs to identify, prevent, and mitigate risks to the human rights of LGBTIQ+ people in the marketplace
- Collaborates with suppliers, business partners and within its own industry and beyond to address risks to the human rights of LGBTIQ+ people
- Has mechanisms to ensure your company has a diverse base of suppliers that includes LGBTIQ+ or LGBTIQ+-supportive suppliers

Encourages suppliers and distributors to have an LGBTIQ+ equality strategy or policy that addresses nondiscrimination, equal pay for equal work, and health and safety of LGBTIQ+ workers

Has robust due diligence or assessment processes for suppliers and distributors to ensure they are not causing or contributing to adverse human rights impacts, including for LGBTIQ+ people. Where such efforts do not meet relevant standards, assesses the impact of terminating business relationships with such business partners or suppliers, unless doing so might itself lead to adverse human rights impacts

Some country offices or units have not taken any steps in relation to this question, as a result of the recommendations of a risk assessment based on the local context

### Measurement

Tracks and monitors the effectiveness of measures to address potential risks to the human rights of LGBTIQ+ people in the marketplace (including suppliers or distributors, customers, and other business relationships)

Sets procurement targets and/or goals for the amount and percentage spend with LGBTIQ+-owned/supportive businesses

Includes LGBTIQ+ equality criteria in standard auditing protocols, supplier scorecards, supplier self-assessment or other supply chain management tools

### Transparency

Reports to the board on action plans and progress against action plans on a periodic basis

Reports publicly to company stakeholders on percentage spend with LGBTIQ+-owned/supportive businesses

Reports publicly on risks to the human rights of LGBTIQ+ people in the marketplace (including suppliers or distributors, customers, and other business relationships)

## 14. Does your company have policies and processes in place to ensure the responsibility to respect the rights of LGBTIQ+ people in the local communities in which it operates?

**No**, our company currently does not have policies and processes in place to ensure the responsibility to respect the rights of LGBTIQ+ people in the local communities in which it operates,

but:

- We are interested in learning more.
  - We plan to take steps in the next year.
  - Some of the country offices or business units have taken steps.
  - None of the above.
- Yes**, our company does have policies and processes in place to ensure the responsibility to respect the rights of LGBTIQ+ people in the local communities in which it operates.

### Commitment

- Has a stand-alone policy or a commitment embedded in a broader corporate policy that addresses respecting the rights of LGBTIQ+ people in the communities in which it operates.

### Implementation

- Assesses whether through their operations or business relations the company is causing or contributing to violence, bullying, intimidation, ill-treatment, incitement to violence, discrimination or other abuses against or human rights risks of LGBTIQ+ people in the local communities
- Ensures regular consultation with local CSOs including, if present, LGBTIQ+ CSOs to:
  - Receive feedback on the impact of company operations
  - Raise awareness of specific experiences and needs of LGBTIQ+ people in local communities of operation
- Provides LGBTIQ+ equality training to facilitators of community consultations
- Provides financial or pro-bono support for programmatic LGBTIQ+ equality work including for LGBTIQ+ organizations working in locations where the company operates
- Some country offices or units have not taken any steps in relation to this question, as a result of the recommendations of a risk assessment based on the local context

### Measurement

- Tracks and monitors the effectiveness of measures to address potential risks of business operations to the human rights of LGBTIQ+ people in local communities in which it operates
- Tracks financial contributions to global and/or grassroots level organizations that are working to empower LGBTIQ+ people.

Tracks LGBTIQ+ stakeholder engagement and participation in community consultations.

### Transparency

Reports to the board on the percentage of operations with local community engagement that includes LGBTIQ+ participation.

Reports publicly to company stakeholders on the percentage of operations in local community engagement, impact assessments, and/or development programs

Reports on financial contributions to global and/or grassroots level organizations that are working to empower LGBTIQ+ people.

## 15. Does your company have an approach to assess potential adverse impacts on the LGBTIQ+ community when developing products and/or services?

**No**, our company currently does not have an approach to assess potential adverse impacts on the LGBTIQ+ community when developing products and/or services, but:

We are interested in learning more.

We plan to take steps in the next year.

Some of the country offices or business units have taken steps.

None of the above.

**Yes**, our company has an approach to assess potential impacts on the LGBTIQ+ community when developing products and/or services.

### Commitment

Has a stand-alone policy or a commitment embedded in a broader corporate policy that ensures products and services are developed for the needs of all consumers, regardless of sexual orientation, gender identity, gender expression or sex characteristics

### Implementation

Assesses differential impacts on LGBTIQ+ communities when developing products and/or services, including on

Sexual orientation, including lesbian, gay and bisexual people

Gender identity and expression, including trans people

Sex characteristics, including intersex people

Conducts market research on the specific product and/or service needs of LGBTIQ+ people.

Engages with LGBTIQ+ stakeholders to understand whether products or services discriminate or adversely impact against LGBTIQ+ people, including

Internal LGBTIQ+ ERGs

External LGBTIQ+ organizations

LGBTIQ+ customers and/or clients

Ensures products or services are not withheld from individuals or groups based on sexual orientation, gender identity and sex characteristics

Develops products and/ or services that specifically target or meet the needs of LGBTIQ+ people, including

Sexual orientation, including lesbian, gay and bisexual people

Gender identity and expression, including trans people

Sex characteristics, including intersex people

Some country offices or units have not taken any steps in relation to this question, as a result of the recommendations of a risk assessment

### **Measurement**

Tracks and monitors the effectiveness of measures to address potential risks of business operations to the human rights of LGBTIQ+ people in relation to products and/or services

### **Transparency**

Communicates publicly to company stakeholders its commitment to ensure products and services are developed with needs of LGBTIQ+ people in mind.

Communicates to the board its commitment to ensure products and services are developed with the needs of LGBTIQ+ people in mind.

## 16. Does your company have an approach to responsible marketing that considers LGBTIQ+ equality?

- No**, our company currently does not have an approach to responsible marketing that considers LGBTIQ+ equality, but:
- We are interested in learning more.
  - We plan to take steps in the next year.
  - Some of the country offices or business units have taken steps.
  - None of the above.
- Yes**, our company has an approach to responsible marketing that considers LGBTIQ+ equality.

### Commitment

- Has a stand-alone responsible marketing policy or a commitment embedded in a broader corporate policy that addresses the portrayal of LGBTIQ+ people and LGBTIQ+ equality, free from negative or harmful stereotypes and narratives

### Implementation

- Has a marketing approach that seeks to challenge existing norms and promote positive images of LGBTIQ+ people, specifically around
- Sexual orientation, including lesbian, gay and bisexual people
  - Gender identity and expression, including trans people
  - Sex characteristics, including intersex people
- Consults with focus groups to ensure marketing approaches are not perpetuating harmful or negative stereotypes and narratives about LGBTIQ+ people
- Ensures diversity in marketing and advertising teams/ departments
- Some country offices or units have not taken any steps in relation to this question, as a result of the recommendations of a risk assessment

### Measurement

- Tracks the number of marketing complaints that relate to LGBTIQ+ stereotyping or

negative portrayals of LGBTIQ+ people.

Tracks engagement with inclusive marketing and advertising campaigns.

### Transparency

Communicates publicly to company stakeholders its commitment to not perpetuate negative and harmful stereotypes and narratives about LGBTIQ+ people

Communicated to the board its commitment to not perpetuate negative and harmful stereotypes and narratives about LGBTIQ+ people

## 17. Does your company actively advocate for LGBTIQ+ equality?

**No**, our company currently does not actively advocate for LGBTIQ+ equality, but:

We are interested in learning more.

We plan to take steps in the next year.

Some of the country offices or business units have taken steps.

None of the above.

**Yes**, our company actively advocates for LGBTIQ+ equality.

### Commitment

Has a commitment or a stand-alone policy or a commitment embedded in a broader corporate policy that addresses embedding LGBTIQ+ equality in public advocacy

### Implementation

Assesses possible public advocacy on LGBTIQ+ equality and makes decisions based on the “do no harm” approach by

Carrying out a risk-assessment of impact on employees and LGBTIQ+ communities in relation to the contemplated public advocacy effort

Meaningfully engaging with local LGBTIQ+ organizations where public advocacy is being contemplated on LGBTIQ+ equality to identify what are constructive and helpful approaches

Mitigate risks of negative impacts on employees and communities

- Engages in public advocacy on behalf of and in support of the rights of LGBTIQ+ people, specifically addressing
  - Sexual orientation and the human rights of lesbian, gay and bisexual people
  - Gender identity and expression and the human rights of trans people
  - Sex characteristics and the human rights of intersex people
- Advocates for the removal of legal barriers that restrict the rights of LGBTIQ+ people and empowerment
- Engages with and provides financial support to civil society organizations at the global and/or grassroots level that are working to empower LGBTIQ+ people
- Engages in inclusive sponsorship of events and initiatives that increase the positive visibility of LGBTIQ+ communities
- Officially sponsors and encourages participation, including senior-level participation, at Pride events to demonstrate support for LGBTIQ+ employees
- Shares best practices in LGBTIQ+ advocacy between organizations and in the public domain (e.g., at the Annual UN Forum on Business and Human Rights)
- Some country offices or units have not taken any steps in relation to this question, as a result of the recommendations of a risk assessment

### **Measurement**

- Has time-bound and measurable goals on positive advocacy actions at global, regional, national, and local levels of company operations
- Tracks and monitors compliance with ensuring risk assessments and prior consultation with local LGBTIQ+ communities prior to carrying out advocacy in the public sphere

### **Transparency**

- Reports publicly on advocacy actions taken.

## 18. Does your company work with other companies, CSOs, and/or local organizations to collectively challenge discriminatory laws and practices?

**No**, our company currently does not work with other companies, CSOs, and/or local organizations to collectively challenge discriminatory laws and practices, but:

- We are interested in learning more.
- We plan to take steps in the next year.
- Some of the country offices or business units have taken steps.
- None of the above.

**Yes**, our company works with other companies, CSOs, and/or local organizations to collectively challenge discriminatory laws and practices.

### Commitment

Has a stand-alone policy or a commitment embedded in a broader corporate policy that addresses embedding LGBTIQ+ equality in corporate social responsibility activities, philanthropy, and partnerships.

### Implementation

Assesses possible collective action on LGBTIQ+ equality and makes decisions based on the “do no harm” approach by

Carrying out a risk-assessment of impact on employees and LGBTIQ+ communities in relation to the contemplated collective advocacy effort

Meaningfully engaging with local LGBTIQ+ organizations where collective advocacy is being contemplated on LGBTIQ+ equality to identify what are constructive and helpful approaches

Mitigate risks of negative impacts on employees and local communities

Consults with external stakeholders including companies, CSOs, and/or local organizations to understand the spectrum of opportunities for collective action to support/empower LGBTIQ+ people and challenge discriminatory laws and practices.

Engages in collective advocacy actions, either directly organized by the company or organized and sponsored by a third party, to advance protection of LGBTIQ+ people and challenge discriminatory laws and practice

Participates in multi-stakeholder initiatives around LGBTIQ+ topics, at global or local levels

Partners with local LGBTIQ+ CSOs, charities and/or social enterprises working in regions of operation to support their efforts

Some country offices or units have not taken any steps in relation to this question, as a result of the recommendations of a risk assessment

### Measurement

Has time-bound, measurable goals and targets on the impacts it seeks to achieve for the LGBTIQ+ community when developing and implementing collective actions on LGBTIQ+ equality and corporate social responsibility activities, philanthropy, and partnerships

Tracks and monitors compliance with ensuring risk assessments and prior consultation with local LGBTIQ+ communities prior to carrying out collective actions on LGBTIQ+ equality

### Transparency

Reports publicly on collective actions on LGBTIQ+ equality and the number of beneficiaries from corporate social responsibility activities, philanthropy, and partnerships that publicly identify as LGBTIQ+

Reports to the board on collective actions on LGBTIQ+ equality and the number of beneficiaries from corporate social responsibility activities, philanthropy, and partnerships that publicly identify as LGBTIQ+

## 19. Does your company take available legal steps to question, challenge, delay, and resist government orders that might lead to human rights violations against LGBTIQ+ people?

**No**, our company currently does not take available legal steps to question, challenge, delay, and resist government orders that might lead to human rights violations against LGBTIQ+ people, but:

We are interested in learning more.

We plan to take steps in the next year.

Some of the country offices or business units have taken steps.

None of the above.

**Yes**, our company takes available legal steps to question, challenge, delay, and resist government orders that might lead to human rights violations against LGBTIQ+ people.

### **Commitment**

Has a policy commitment to meet its responsibility to respect human rights, expressly including the rights of LGBTIQ+ people

### **Implementation**

Assesses possible available legal steps to question, challenge, delay, and resist government orders that might lead to human rights violations against LGBTIQ+ people and makes decisions based on the “do no harm” approach by

Carrying out a risk-assessment of impact on employees and LGBTIQ+ communities in relation to the contemplated legal steps

Meaningfully engages with local LGBTIQ+ organizations to identify constructive approaches and to

Mitigate risks of negative impacts for employees and local communities.

Has developed localized approaches or policies in relation to discriminatory local laws.

Some country offices or units have not taken any steps in relation to this question, as a result of the recommendations of a risk assessment based on the local context

### **Measurement**

Monitors local laws and policies that may lead to human rights violations against LGBTIQ+ people.

Tracks and monitors compliance with ensuring risk assessments and prior consultation with local LGBTIQ+ communities prior to questioning, challenging, delaying and resisting government orders that can lead to human rights violations against LGBTIQ+ people.

### **Transparency**

Reports publicly on the approach to local laws and policies that may lead to human rights violations against LGBTIQ+ people

## **20. Does your company engage in dialogue, consultation and information exchange on issues relating to the rights of LGBTIQ+ communities with subject matter experts**

**such as local CSOs, activists, public health advocates, community advocates, or other types of external stakeholders?**

**No**, our company currently does not engage in dialogue, consultation and information exchange on issues relating to the rights of LGBTIQ+ communities, but:

- We are interested in learning more.
- We plan to take steps in the next year.
- Some of the country offices or business units have taken steps.
- None of the above.

**Yes**, our company engages in dialogue, consultation and information exchange on issues relating to the rights of LGBTIQ+ communities.

**Commitment**

Has a commitment to engage social dialogue, consultation and information exchange with LGBTIQ+ communities and organizations

**Implementation**

Engages with CSOs, unions, and other representatives of vulnerable LGBTIQ+ populations to better understand risks and impacts to LGBTIQ+ communities at the:

- Local level
- Regional level
- National level
- Industry level

Has procedures to incorporate feedback into its own policies and decision-making and better address the needs of the LGBTIQ+ community.

Participates in and responds to government consultations in relation to the rights of LGBTIQ+ people

Leverages corporate networks, events, awards, and recognitions to establish a voice on the rights of LGBTIQ+ people

Some country offices or units have not taken any steps in relation to this question, as a result of the recommendations of a risk assessment based on the local context

## Measurement

- Has time-bound and measurable goals and targets related to the social dialogue, consultation and information strategy on issues relating to the rights of LGBTIQ+ communities is incorporated into decision-making
- Tracks progress towards goals and targets related to the social dialogue, consultation and information strategy on issues relating to the rights of LGBTIQ+ communities is incorporated into decision-making

## Transparency

- Reports publicly on feedback received in social dialogue that may inform best practices on LGBTIQ+ inclusion.