



Non-discrimination & Equality Analysis Tool

OVERVIEW

Non-discrimination is a fundamental human right. Every worker and job seeker has the right to freely pursue employment opportunities, realise their full potential and be treated equally, regardless of any attributes other than their ability to do the job.

Non-discrimination is rooted in Articles 1 and 2 of the Universal Declaration of Human Rights, which Principle 1 of the UN Global Compact calls on businesses to respect. In turn, Principle 6 specifically requires businesses to uphold the elimination of discrimination in respect of employment and occupation. Promoting workplace non-discrimination and equality - and embedding these principles throughout business operations - is an important step in tackling inequality and eliminating discrimination worldwide.

This anonymous and confidential self-assessment tool allows companies to assess the effectiveness of their policies and practices related to workplace non-discrimination and equality. The tool guides you through a structured set of questions across thirteen key performance areas.

TOPICS & QUESTIONS IN THE TOOL

1. Policy Commitment

Does your company have a policy commitment to workplace non-discrimination and equality?

- ☐ No, our company does not yet have a policy commitment to workplace non-discrimination and equality
 - ☐ We are interested in learning more
 - ☐ We plan to take steps in this area in the next year
 - ☐ Some of our subsidiaries, regional or national offices have developed policies on workplace non-discrimination and equality
 - ☐ None of the above
- ☐ Yes, our company has a policy commitment to workplace non-discrimination and equality

- ☐ Our company has a policy commitment to non-discrimination in all aspects of employment and occupation, with specific reference to:
 - ☐ Age
 - ☐ Gender
 - ☐ Nationality
 - ☐ Ethnicity
 - ☐ Sexual orientation and gender identity
 - ☐ Race
 - ☐ Religion
 - ☐ Colour
 - ☐ Caste
 - ☐ Language
 - ☐ Disability
 - ☐ HIV/AIDS status
 - ☐ Marital status
 - ☐ Union membership
 - ☐ Political affiliation
 - ☐ Parental status and/or family responsibilities
 - ☐ Personal characteristics that are not relevant to genuine job requirements
- ☐ Our policy prohibits discrimination in relation to all aspects of the employment relationship, including recruitment and hiring, job assignment, compensation (including wages and benefits), working conditions and terms of employment (including reasonable adaptation of the workplace in relation to disabilities), access to training and professional development opportunities, promotion, termination of employment or retirement and disciplinary measures
- ☐ Our policy commitment prohibits work-related violence and harassment, including gender-based violence and harassment
- ☐ Our policy commitment includes a reference to relevant international standards
- ☐ Our policy commitment is publicly available
- ☐ Our policy commitment is approved at the most senior level of the company
- ☐ Our policy commitment makes clear the company's expectations towards personnel, business partners, and other parties directly linked to its operations, products or services
- ☐ Our policy commitment clarifies what types of support and resources are available to employees
- ☐ Our policy was developed with input from both internal experts and external specialists
- ☐ Our policy was developed on the basis of consultation with employees and worker representatives
- ☐ Our policy is communicated to all employees
- ☐ Our policy is communicated to all employees during recruitment and as

- part of our onboarding process
- ☐ Our policy has appropriate internal accountability for its implementation

2. Leadership Commitment and Strategy

Does your company have leadership commitment and support for non-discrimination and equality?

- ☐ No, our company does not yet have leadership commitment and support for non-discrimination and equality
 - ☐ We are interested in learning more
 - ☐ We plan to take steps in this area in the next year
 - ☐ Some of our subsidiaries, regional or national offices have taken steps to advance leadership commitment and strategy
 - ☐ None of the above
- ☐ Yes, our company has senior-level leadership commitment and support for non-discrimination and equality
 - ☐ Our company's leadership has circulated an internal communication outlining our commitment to non-discrimination and equality
 - ☐ Our company's leadership has made a public written commitment to non-discrimination and equality
 - ☐ We promote non-discrimination and diversity in our board, committee and management composition and seek to attract, recruit and retain diverse members
 - ☐ We have an organization-wide non-discrimination and equality plan or strategy that is endorsed by senior leadership and identifies specific areas where further improvement can be made
 - ☐ We have an organization wide non-discrimination and equality plan or strategy that outlines our rationale for advancing workplace non-discrimination and equality, including the business case and benefits to our organization ('why')
 - ☐ We have an organization wide non-discrimination and equality plan or strategy that articulates how non-discrimination and equality are integrated into our broader corporate sustainability efforts overall business performance goals
 - ☐ Our organization-wide non-discrimination and equality plan or strategy sets out clear, time-bound and measurable goals
 - ☐ Our company's senior leaders proactively advocate for non-discrimination and equality and promote our company's commitments publicly
 - ☐ Our organization-wide non-discrimination and equality plan or strategy includes formal accountability mechanisms for progress and outcomes on the plan or strategy
 - ☐ We report publicly on progress made under the plan or strategy
 - ☐ The assessment of our senior leadership team's performance is linked to the organization's progress on non-discrimination and equality

- ☐ We have a designated team or individual responsible for advancing workplace non-discrimination and equality, with the necessary seniority, resources and support to perform their role effectively
- ☐ Non-discrimination and equality are integral to our ongoing human rights due diligence efforts, in accordance with the UN Guiding Principles

3. Non-discrimination and Equality in Recruitment

Does your company have a strategy or formal approach to ensure non-discrimination and equal opportunity in relation to recruitment?

- ☐ No, our company does not yet have a strategy or formal approach to ensure non-discrimination and equal opportunity in relation to recruitment
 - ☐ We are interested in learning more
 - ☐ We plan to take steps in this area in the next year
 - ☐ None of the above
- ☐ Yes, our company actively promotes non-discrimination and equality in recruitment
 - ☐ The main focus of our approach is compliance with requirements under national/local legislation
 - ☐ Our company has measures in place to ensure that the recruitment process is based on clear and objective evaluation criteria relevant to the job
 - ☐ We regularly review job descriptions to ensure that they accurately reflect the responsibilities and qualifications required for each role and avoid language that may unintentionally introduce bias
 - ☐ Our company has measures in place to ensure that the composition of recruitment panels is as diverse as possible
 - ☐ Our company has measures in place to ensure that the interview shortlist is as diverse as possible while focused on merit (e.g. anonymising candidate information during shortlisting)
 - ☐ Our company has measures in place to ensure that job descriptions and advertising use inclusive language and images
 - ☐ Our company's commitment to non-discrimination and equality is reflected in all job advertisements, at all levels
 - ☐ Our company has measures in place to ensure that we use a wide range of recruitment channels, media and job boards in order to encourage diverse applicants
 - ☐ Our company has measures in place to ensure that where we use technology to screen candidates, the technology is vetted to ensure that it does not discriminate on the basis of personal characteristics that are not relevant to the job
 - ☐ We provide non-discrimination and equality training to recruitment panels and decision-makers
 - ☐ We actively invite candidates with disabilities to request any necessary

adjustments at every stage of the recruitment process

- ☐ We have taken steps to remove barriers to candidates with disabilities and provide reasonable adjustments at every step of the process (e.g. automated e-recruitment, assessments using Artificial Intelligence, interviews, skill tests and/or gamified assessments)
- ☐ We train our recruiters and hiring managers on how to make reasonable adjustments/accommodations to our recruitment processes, including online processes
- ☐ We take into account the needs of diverse groups when scheduling and conducting interviews (e.g. reasonable adjustments for people with disabilities; flexible scheduling for individuals with care responsibilities)
- ☐ We have measures in place to ensure that candidates are not required to provide medical information as part of the recruitment process, except where required by law
- ☐ We offer paid or supported internship and/or work experience programmes that support under-represented groups
- ☐ Our company takes proactive steps to attract and recruit under-represented groups into different roles (e.g. advertising campaigns to target under-represented groups; participation in jobs fairs for under-represented groups; partnerships with schools and universities to raise awareness of career opportunities for under-represented groups)
- ☐ We have time-bound and measurable targets to increase the recruitment of under-represented groups

4. Non-discrimination and Equality in Promotion, Training and Professional Development

Has your company taken steps to ensure non-discrimination and equal opportunity in relation to promotion, training and professional development?

- ☐ No, our company has not yet taken steps to ensure non-discrimination and equal opportunity in relation to promotion, training and professional development
 - ☐ We are interested in learning more
 - ☐ We plan to take steps in this area in the next year
 - ☐ None of the above
- ☐ Yes, our company has taken steps to ensure non-discrimination and equal opportunity in relation to promotion, training and professional development
 - ☐ The main focus of our approach is compliance with requirements under national/local legislation
 - ☐ Our company has measures in place to ensure that the promotion process at all levels is transparent and grounded in merit, using clear and objective criteria
 - ☐ We have measures in place to ensure that teams with responsibility for making decisions on promotions are as diverse as possible and are provided with non-discrimination and equality training

- ☐ We have specific programmes in place to build the pipeline of under-represented groups for leadership roles
- ☐ We offer mentoring programmes with support for under-represented groups
- ☐ We have time-bound and measurable targets to increase the proportion of under-represented groups in management and leadership roles
- ☐ We offer leadership coaching for under-represented groups
- ☐ We offer access to professional networks (internal and external) for under-represented groups
- ☐ We offer development trainings, rotational programmes, and educational opportunities with support for under-represented groups
- ☐ Our company has measures in place to ensure professional development and training opportunities are available and accessible to all workers at all levels
- ☐ Our company has adopted objective performance metrics and has measures in place to minimise biases in performance evaluations
- ☐ Our company has measures in place to ensure that disciplinary procedures are applied consistently, avoiding dismissal based on personal characteristics or criteria that are not relevant to job performance

5. Non-discrimination in Compensation and Benefits

Does your company have a strategy or formal approach to ensure non-discrimination in relation to compensation and benefits?

- ☐ No, our company does not yet have a strategy or formal approach to ensure non-discrimination in relation to compensation and benefits
 - ☐ We are interested in learning more
 - ☐ We plan to take steps in this area in the next year
 - ☐ None of the above
- ☐ Yes, our company has a strategy or formal approach to ensure non-discrimination in relation to compensation and benefits
 - ☐ The main focus of our approach is in compliance with requirements under national/local legislation
 - ☐ Our company has measures in place to ensure equal pay for work of equal value
 - ☐ We have processes in place to review and address pay inequalities (including working with workers' representatives)
 - ☐ We have processes in place to review other financial benefits when reviewing compensation, including e.g. bonuses, insurance benefits, retirement contributions
 - ☐ We conduct regular pay audits to identify pay disparities based on demographic factors (e.g. gender, race)

- ☐ We implement clear and transparent compensation structures, clearly communicating to all personnel how compensation is determined, including base pay, bonuses and incentives

6. Working Conditions and Terms of Employment

Does your company offer working conditions and terms of employment that support non-discrimination and equality?

- ☐ No, our company does not offer working conditions and terms of employment that support non-discrimination and equality
 - ☐ We are interested in learning more
 - ☐ We plan to take steps in this area in the next year
 - ☐ Some of our country offices or business units have taken steps
 - ☐ None of the above
- ☐ Yes, our company offers terms and conditions of employment that support non-discrimination and equality
 - ☐ The main focus of our approach is in compliance with requirements under national/local legislation
 - ☐ We offer flexible working hours (where permitted by roles and operational circumstances), which give individuals greater freedom to manage care-giving responsibilities, health conditions and other personal circumstances
 - ☐ We offer remote / hybrid working options (where permitted by roles and operational circumstances)
 - ☐ We offer part-time working arrangements (where permitted by roles and operational circumstances)
 - ☐ We offer paid sick leave that exceeds requirements under national/local legislation
 - ☐ We offer paid parental leave that exceeds requirements under national/local legislation (equally available to both parents)
 - ☐ We offer paid maternity leave that exceeds requirements under national/local legislation
 - ☐ We offer paid paternity leave that exceeds requirements under national/local legislation
 - ☐ We offer paid leave for IVF/fertility treatment, adoption and surrogacy support that exceeds requirements under national/local legislation
 - ☐ We offer paid leave for carers that exceeds requirements under national/local legislation
 - ☐ We offer paid gender affirmation leave
 - ☐ We offer flexible holidays to accommodate diverse cultural and religious holidays
 - ☐ We provide additional support for parents and individuals with care-giving responsibilities (e.g. breastfeeding facilities, childcare vouchers, onsite

- childcare, referrals for aged care services)
- ☐ Our leave policies are inclusive of LGBTIQ+ employees and we provide the same benefits in relation to partners, spouses, children and dependents, regardless of gender, sexual orientation, gender identity and expression and sex characteristics (or we have alternative solutions where there are legal restrictions and/or gaps in the protection of LGBTIQ+ individuals)
- ☐ We routinely assess whether reasonable adjustments are delivered efficiently and effectively for job candidates and for employees with disabilities
- ☐ We ensure confidentiality of personal health and disability-related information, including requests for reasonable adjustments
- ☐ We ensure that dietary restrictions are taken into account in social and work-related events
- ☐ We design, maintain, and adapt our spaces to meet or exceed accessibility standards and guidelines for people with disabilities, such as ISO 2154
- ☐ We schedule social and work-related events with regard for caregiving responsibilities
- ☐ We provide a designated quiet space for prayer or religious observances
- ☐ We include work-related violence, harassment, and psychosocial risks in our workplace OSH management systems, with procedures to identify hazards, assess associated risks and put in place corresponding risk controls.
- ☐ Our workplaces offer sanitary facilities that meet the needs of diverse groups, including people of diverse genders and people with disabilities

7. Grievance, Remediation and Retaliation

Does your company have an inclusive and effective grievance mechanism, providing access to remedy and preventing retaliation, that takes into account the needs of diverse groups?

- ☐ No, our company does not yet have an inclusive and effective grievance mechanism, providing access to remedy and preventing retaliation that takes into account the needs of diverse groups
 - ☐ We are interested in learning more
 - ☐ We plan to take steps in this area in the next year
 - ☐ None of the above
- ☐ Yes, our company has an inclusive and effective grievance mechanism, providing access to remedy and preventing retaliation
 - ☐ We have an internal whistleblower mechanism in addition to our grievance mechanisms
 - ☐ Our company allows workers lodging concerns or complaints to participate in hearings held with respect to that concern/complaint and ensures that they are informed of the outcome of the resolution process

- ☐ We have appointed a committee / a team that is responsible for hearing, processing, and settling concerns/complaints and includes workers' representatives
- ☐ We provide non-discrimination, anti-violence, and anti-harassment training - including on discrimination-based violence and harassment - to teams responsible for administering grievance mechanisms.
- ☐ We have a written procedure for how concerns and complaints are received, processed and settled, which takes into account the needs of diverse groups
- ☐ We have protocols in place to assure the strict confidentiality of all complaints
- ☐ We have measures in place to enable workers to lodge anonymous complaints
- ☐ We have measures in place to ensure safety and non-retaliation for complainants, whistle-blowers and witnesses
- ☐ We have measures in place to offer appropriate support to survivors of work-related violence and harassment (e.g. counselling, additional leave)
- ☐ We investigate all complaints of work-related violence and harassment and take appropriate preventative and disciplinary action, including reporting of criminal actions to the appropriate authorities
- ☐ Workers, including temporary and contract workers, are encouraged to submit concerns/complaints regarding the company's activities and impact and can do so without threat of retaliation by management or other workers

8. Training and Awareness Raising

Does your company have a training and awareness-raising programme on non-discrimination and equality?

- ☐ No, our company does not yet have a training and awareness-raising programme on non-discrimination and equality
 - ☐ We are interested in learning more
 - ☐ We plan to take steps in this area in the next year
 - ☐ None of the above
- ☐ Yes, our company has a training and awareness-raising programme on non-discrimination and equality
 - ☐ Our company has implemented mandatory executive education and training on non-discrimination and equality
 - ☐ Our company has implemented mandatory manager training on non-discrimination, inclusion and anti-harassment (including how to support employee well-being and career development for diverse groups)
 - ☐ Our company has implemented mandatory training and awareness raising on non-discrimination and equality for all staff (including during induction)

- ☐ Our company has implemented mandatory preventative training for all staff in relation to work-related violence, harassment and retaliation (including during induction)
- ☐ Our company regularly communicates the organizational and business benefits of our non-discrimination and equality policies
- ☐ Basic intersectionality concepts are introduced in all of our non-discrimination training and awareness-raising programmes

9. Internal Engagement and Inclusive Work Culture

Does your company take proactive steps to foster an inclusive work culture?

- ☐ No, our company does not yet have measures in place to foster an inclusive work culture
 - ☐ We are interested in learning more
 - ☐ We plan to take steps in this area in the next year
 - ☐ Some of our subsidiaries, regional or national offices have taken steps in relation to people who may be at risk, based on the local context
 - ☐ None of the above
- ☐ Yes, our company takes proactive steps to foster an inclusive work culture
 - ☐ Our company engages with workers and their representatives on non-discrimination and equality issues, including representatives of diverse groups
 - ☐ Our company consults with workers and their representatives to determine if our policies and practices meet the needs of diverse groups
 - ☐ Our company undertakes regular employee well-being surveys and analyses survey results by different demographic groups
 - ☐ Our company has encouraged and supported the creation and operation of official Employee Resource Groups for diverse groups
 - ☐ Our company has encouraged and supported the efforts of diverse groups to create informal staff groups
 - ☐ Our company proactively highlights and celebrates role models from diverse groups, including those in leadership roles

10. External Advocacy and Engagement

Does your company publicly advocate and engage with external stakeholders on non-discrimination and equality?

- ☐ No, our company does not yet publicly advocate and engage with external stakeholders on non-discrimination and equality
 - ☐ We are interested in learning more
 - ☐ We plan to take steps in this area in the next year

- ☐ None of the above
- ☐ Yes, our company publicly advocates and engages with external stakeholders on non-discrimination and equality
 - ☐ Our company has engaged in dialogue on public policy in relation to non-discrimination and equality
 - ☐ Our company has joined public advocacy campaigns and/or advocated the business case for improving non-discrimination and equality in public forums
 - ☐ We have formed partnerships with other companies or organizations to make more progress on non-discrimination and equality
 - ☐ Our company participates in dialogue, consultation and information exchange on non-discrimination and equality with external partners
 - ☐ Our company engages with external stakeholders including civil society organizations representing groups at risk of discrimination and exclusion, as part of our Human Rights Due Diligence (HRDD) process
 - ☐ Our company actively seeks engagement with affected stakeholders who have intersecting experiences of discrimination, including international organizations, workers' organizations, civil society and local communities
 - ☐ Our company provides financial support to civil society organizations at the global and/or grassroots level that are working to promote non-discrimination and equality, including those who are focused on equal opportunity and non-discrimination for specific groups

11. Monitoring, Reporting and Disclosure

Does your company monitor, report and disclose its non-discrimination and equality performance?

- ☐ No, our company does not yet monitor, report and disclose its non-discrimination and equality performance
 - ☐ We are interested in learning more
 - ☐ We plan to take steps in this area in the next year
 - ☐ None of the above
- ☐ Yes, our company monitors, reports and discloses its non-discrimination and equality performance
 - ☐ Our company collects data and disaggregates results by gender and under-represented demographic groups in relation to:
 - ☐ Workforce composition (at different levels of seniority and in different functions)
 - ☐ Recruitment (including data on successful and unsuccessful candidates)
 - ☐ Leadership roles, leadership development programmes and promotions
 - ☐ Pay

- ☐ Training
- ☐ Attrition
- ☐ Grievances
- ☐ Incidents of gender-based violence and harassment
- ☐ Health and safety incidents
- ☐ % spend with suppliers and vendors
- ☐ Our company collects data on the number of employees (disaggregated by different demographic groups) that take advantage of:
 - ☐ Flexible working arrangements
 - ☐ Remote working arrangements
 - ☐ Maternity, paternity and parental leave
- ☐ We conduct regular audits and develop corrective action plans to address any gaps or concerns identified
- ☐ Our company reports to the board on progress on workplace equality and non-discrimination metrics
- ☐ Our company reports to employees on workplace equality and non-discrimination metrics, including incidents of discrimination and harassment and corrective actions taken
- ☐ Our company ensures data protection and confidentiality in relation to workplace equality and non-discrimination data
- ☐ Our company reports publicly on progress on and violation of commitments to - and policies on - non-discrimination and equality

12. Supplier Diversity

Does your company take active steps to engage or expand relationships with suppliers and vendors from diverse or under-represented groups throughout the value chain?

- ☐ Not applicable (our company does not have suppliers or vendors)
- ☐ No, our company does not yet take active steps to engage or expand relationships with suppliers and vendors from diverse or under-represented groups
 - ☐ We are interested in learning more
 - ☐ We plan to take steps in this area in the next year
 - ☐ We have some processes and systems in place in relation to particular groups, or in particular jurisdictions
 - ☐ None of the above
- ☐ Yes, our company takes active steps to engage or expand relationships with suppliers and vendors from diverse or underrepresented groups
 - ☐ Our company has a policy commitment to proactively source from businesses owned by diverse and under-represented groups
 - ☐ Our company sets targets or goals for the amount and percentage of money spent with businesses owned by diverse and under-represented groups

- ☐ Our company takes proactive steps to connect with and expand relationships with businesses owned by diverse and under-represented groups
- ☐ Our company provides training to diverse and under-represented groups to enable them to participate in formal bid processes
- ☐ Our company has partnerships with external organizations to improve outreach to suppliers from diverse and under-represented groups

13. Supplier Performance on Non-discrimination and Equality

Does your company take steps to encourage suppliers and vendors to promote workplace non-discrimination and equality in their own operations?

- ☐ Not applicable (our company does not have suppliers or vendors)
- ☐ No, our company does not take steps to encourage suppliers and vendors to promote workplace non-discrimination and equality in their own operations
 - ☐ We are interested in learning more
 - ☐ We plan to take steps in this area in the next year
 - ☐ We have some processes and systems in place in relation to particular groups, or in particular jurisdictions
 - ☐ None of the above
- ☐ Yes, our company takes steps to encourage suppliers and vendors to promote workplace non-discrimination and equality in their own operations
 - ☐ Our company has integrated different aspects of workplace non-discrimination and equality into procurement and sourcing requirements (e.g. Supplier Code of Conduct)
 - ☐ Our company integrates expectations for workplace non-discrimination and equality into supplier communications
 - ☐ Our company actively encourages suppliers and vendors to have a gender equality strategy or plan
 - ☐ Our company actively encourages suppliers and vendors to have goals and targets on workplace non-discrimination and equality
 - ☐ Our company offers support to suppliers and vendors for continuous improvement on workplace equality and non-discrimination outcomes
 - ☐ Our company includes criteria for non-discrimination and equality in standard auditing protocols, supplier scorecards or other supplier management tools
 - ☐ We work with suppliers and vendors to develop a corrective action plan if risks or challenges arise related to workplace non-discrimination and equality
 - ☐ We include non-discrimination and equality questions in supplier self-assessments