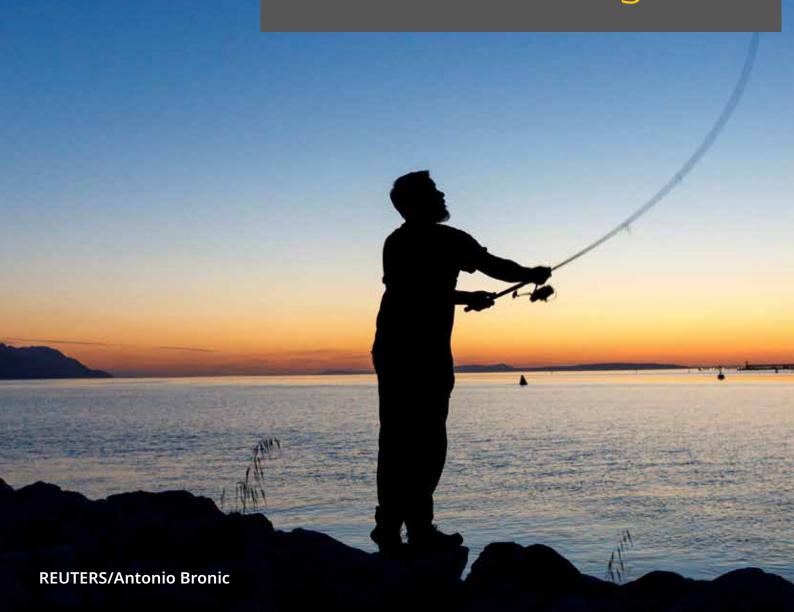
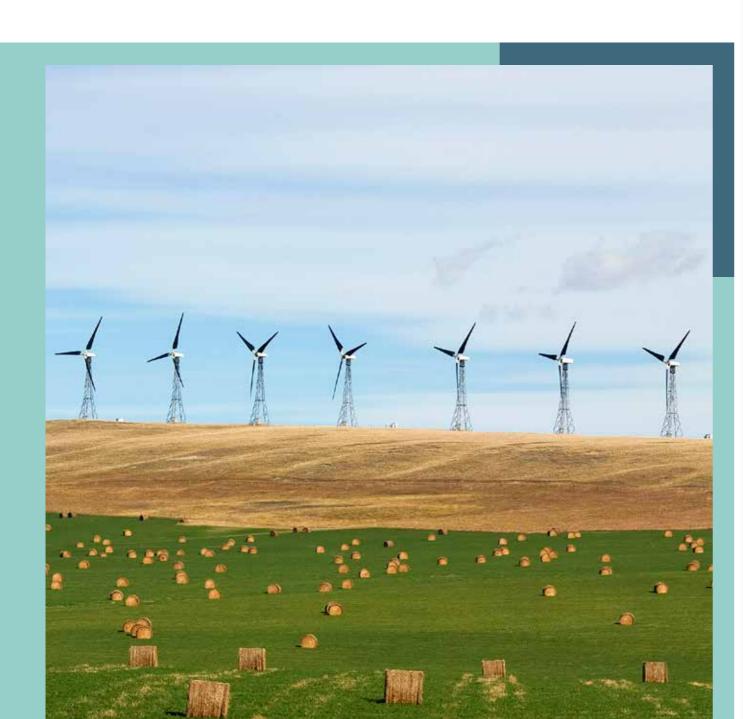




2024 Workforce Disclosure:

Trends and Insights





REUTERS/Todd Korol

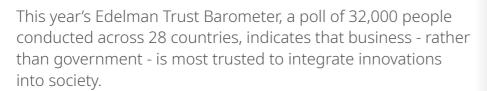
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Foreword

by Antonio Zappulla, CEO, Thomson Reuters Foundation



These findings are not surprising. They confirm a previous trend that sees the corporate sector enjoying higher levels of trust than governmental institutions.

But trust comes with responsibility.

Increasingly, large international corporations play a critical role in shaping better societies. After all, the market cap of some of the biggest companies trading on the stock market today is as big as the GDP of entire nations. Think of Amazon, Apple or Microsoft whose market cap reached over 2 trillion dollars, a valuation that's bigger than the GDP of Turkey, Sweden and the Netherlands.

This sheer economic power means that some of the world's largest corporations can affect change more quickly and – at times with even greater impact than governments. They can exert huge power over workers in their operations, supply chains and their surrounding communities.



Human rights and corporate transparency are deeply intertwined

Over the past year, the Thomson Reuters Foundation has been focused on improving data, transparency and accountability amongst businesses with the acquisition of a voluntary corporate disclosure platform, the Workforce Disclosure Initiative (WDI). This platform creates powerful insights into how some of the world's largest companies manage people in their operations and in their value chains. By encouraging a cycle of transparency and accountability, businesses can benchmark performance and identify areas for improvement, and investors can make better-informed decisions.

This report marks the first reporting cycle for WDI in its new home with us at the Thomson Reuters Foundation and we're delighted to see continued participation and engagement, with more countries represented this year.

Record engagement and participation

With the support of our investors, WDI approached a record 462 companies in 2024, actively engaging with 278 companies and receiving submissions from 144 companies hailing from across the globe, covering every sector and every continent.

We have been encouraged by the ongoing corporate support for our 2024 reporting cycle. This year, we received responses from companies across 25 countries - five more than last year - spanning all sectors and including more emerging markets, which have demonstrated a commitment to enhanced disclosure. We have also received first-hand accounts - which you can read below - from businesses on how improved transparency has significantly bolstered oversight and performance.

Key trends

This year's findings outline the continued importance of voluntary disclosure and transparency in a fast-changing environment for businesses. In some regions, reporting on ESG criteria has become a lightning rod for polarised political debate. At the same time, companies face increased scrutiny on the social or environmental causes with which they align themselves.

Despite this, there is a clear need for comprehensive and comparable data to mitigate risks and safeguard human rights as companies chart their way forward. That's why we were pleased to see a significant increase in companies prioritising oversight and transparency of their social impacts both within their direct operations and across their value chain. This has been driven in part by rising regulatory requirements, including the EU's Corporate Sustainability Reporting Directive (CSRD), Germany's Supply Chain Due Diligence Act and Norway's Transparency Act, all of which seek to protect human and labour rights in companies' value chains. Yet as workforce patterns shift, this year's WDI data identifies potential blind spots for companies when it comes to gig-economy workers, diversity reporting and regressions in certain aspects of human rights due diligence (HRDD).

Our investor coalition

The WDI's achievements are only possible through the support of investors, who use the data to inform their stewardship of companies. This year, 47 investors carried out engagement with companies on WDI's behalf. They have also lent their support in other ways, including participating in roundtables, and contributing to our broader work to encourage corporate transparency and accountability. In the past year, for example, WDI has supported the International Sustainability Standards Board (ISSB) in researching comprehensive social standards which best meet investor needs. This collaborative effort has fostered a sense of resilience and a common goal, amid a challenging time for responsible investment and responsible business.

Looking to the future

As we reflect on WDI's first reporting cycle at the Foundation, we look forward to continuing to grow and scale the platform and to embedding its insights into our work to shape more responsible business practices.

Alongside our investors, we are committed to empowering organisations to thrive while doing no harm. As the ethos of WDI demonstrates, it is only by working together that we can shape workforce practices that balance people and profit.

Thank you for your continued support.

Antonio Zappulla





Join the WDI investor signatories

Since its establishment in 2017, the WDI has worked with institutional investors to improve corporate workforce transparency. Investor support has been vital in generating new workforce data, encouraging wider engagement from companies, and promoting a greater understanding of the workforce topics covered in the annual WDI survey.

Investors are integral to the success of the WDI and actively contribute towards many areas of its work. 47 institutions with USD\$7.5 trillion AUM are part of the WDI signatory group. In 2024, signatories engaged 152 companies, encouraging them to take part in the WDI.

In return for a membership fee that is tiered according to the value of investors' assets, investor signatories receive full access to all workforce data submitted by companies, company disclosure scorecards and opportunities for engagement with companies on WDI data and workforce practices. Signatories also receive access to exclusive resources, events and the latest WDI research on workforce topics to help them make the most of WDI's unique data set.

Our investors all share a desire for better, and more consistent reporting on workforce practices and together they present a formidable coalition. Without their work engaging companies and encouraging them to take part in the survey, this report would not be possible. This year we would like to offer particular credit to Liontrust Asset Management, Ethos Foundation, and Border to Coast Pension Partnership, who engaged the most companies during the disclosure period.

For the most up to date list of signatories, please find the full list here.

To support the WDI's work or to find out more about the benefits of membership please contact Ed Long, Head of Investor Engagement at ed.long@thomsonreuters.com.

Current investor signatories

Boston Trust Walden Principled Investing.	Domini. Investing for Good.	MFS° Investment Management	Amundi
Australian Super	Banco Posta Fondi sgr	Barrow Cadbury Trust	BRUNEL Pension Partnership
CCLA GOOD INVESTMENT	THE CHURCH OF ENGLAND PENSIONS BOARD	CANDRIAM INVESTORS GROUP	CAST LEFI ELD®
DANA Investment Advisors	₩ ESG-AM	edentree trestment management	ethos
FRIENDS PROVIDENT Foundation	Greenbank	Guy's & St Thomas' Foundation	HSBC (Global Asset Management
HERMES	IG4 CAPITAL	INDEPENSENT FRANCHISE PARTNERS*	OSEPH ROWNTREE CHARTABLE TRUST
Lankelly Chase	Local Authority Pension Fund Forum	LPP Local Pensions Partnership	NorthernLGPS The Callective Asset Tool Canadas Manchester Manageride and West Torkshipe Pension Funds
NORTHSTAR ASSET MANAGEMENT Progressive Weeth Management Since 1996	pka **	PALATINE (I	Pension
POLUNIN	SRPMI RAILPEN	Schroders	SCOTTISH WIDOWS
PENSIONS PARTNERSHIP	QUANTUM	SAUL	
nest	SYCO M@re am	USS	UNISON
vision super	COLUMBIA THREADNEEDLE INVESTMENTS	Crédit 🚱 Mutuel	LIONTRUST





Investor perspective



Voluntary disclosures like the WDI are a vital tool for investors in the sustainability space, even as the regulatory landscape evolves in EU and abroad. A 2023 study by Deloitte found that 83% of institutional investors believe voluntary disclosures ISSB framework, on the other hand, provide critical insights beyond mandatory reporting.

Sustainability reporting initiatives like ESRS/CSRD, ISSB, etc. will make reporting on extra financial metrics obligatory for all corporates, but their implementation timelines can be lengthened and shifted, and disclosure requirements can be reassessed, becoming less comprehensive or leaving out crucial details.

The European Commission adopted the ESRS framework in July 2023, but it has yet to be transposed into national legislations by many EU countries. Furthermore, many industry players (i.e., SMEs or nonEU firms) will not be required to disclose for as far as up to 2029. ESRS S2 KPIs, which cover workers in the value chain, are allowed to be omitted during the first two years of implementation. The current remains weak on social KPIs given their strong focus on financial materiality.

In light of the growing backlash against ESG, voluntary disclosures are becoming even more critical. As scepticism rises about the relevance and accuracy of ESG metrics, transparent voluntary disclosures can help rebuild trust. By proactively disclosing ESG data, companies demonstrate accountability and offer deeper insights into their environmental, social, and governance impacts. This not only reassures investors but also aligns with the growing trend of responsible investing, which reached \$35 trillion globally by 2022.

The WDI is essential in the social disclosure landscape, providing consistency and investor-relevant data.

Through year-on-year reporting, the WDI enables investors to track progress and establish a company's direction of travel. The WDI's focus on investor-determined data points ensures that the disclosed information aligns directly with investor priorities. Additionally, its emphasis on value chain and contract worker reporting is crucial, addressing labour practices and social risks often overlooked in mandatory frameworks. This comprehensive approach gives investors a better understanding of the social aspects of corporate performance, leading to more informed investment decisions.



Deepshikha Singh

Head of Stewardship and **Deputy Head of Sustainable Investment Research**

Crédit Mutuel Asset Management, Groupe La Française

WDI's approach

WDI is dedicated to promoting corporate transparency by encouraging companies to disclose comprehensive workforce-related data.

Our approach is centred around the detailed survey which enables companies to identify risks and opportunities within their direct operations and supply chains. This approach involves close collaboration with both companies and investors.

As we continue to expand our global reach and refine our research methodologies, we are setting robust standards in workforce transparency and driving positive changes across industries and regions.



Our mission

To foster corporate transparency through the promotion, collection and reporting of social data, identifying risks and opportunities, and prompting corrective actions

Outcomes

For companies: Enhanced transparency leading to better operational decisions and improved workforce practices

For investors: Access to reliable data supporting informed, responsible and sustainable investment decisions

Globally: Driving transformative change towards more equitable, transparent, and sustainable workforce practices

WDI activities

Conduct tailored and focused investor engagement

Define targeted company list¹ and conduct tailored and focused company engagement

Create a comprehensive 13-section survey on worker rights

Pre-populate survey with companies' publicly available data to facilitate the process

Support companies, guiding them through the survey process and promoting transparency

Investors collaborate with WDI to encourage company participation

Investors provide feedback to ensure the survey aligns with investment needs





Companies participate in the WDI survey and disclose relevant operational and supply chain data

Outputs

- Reports
- Scorecards
- Thematic briefings
- Financial materiality analysis
- Policy analysis
- Feedback call
- Webinars
- Case study
- Transparency awards...



WDI analyses collected data and conducts thematic research

WDI data at a glance

Responding companies had a combined market capitalisation of

US\$9 trillion

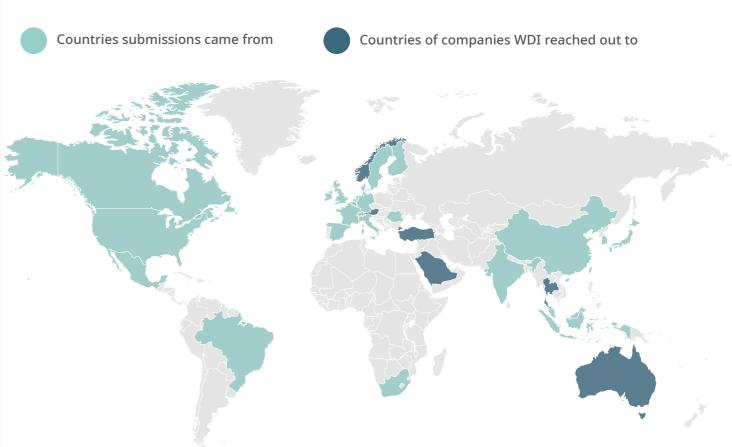
companies submitted

companies approached

engaged



Submissions came from 25 countries across 5 continents



8 million employees

in companies' direct operations and many more in supply chains are covered in submissions.













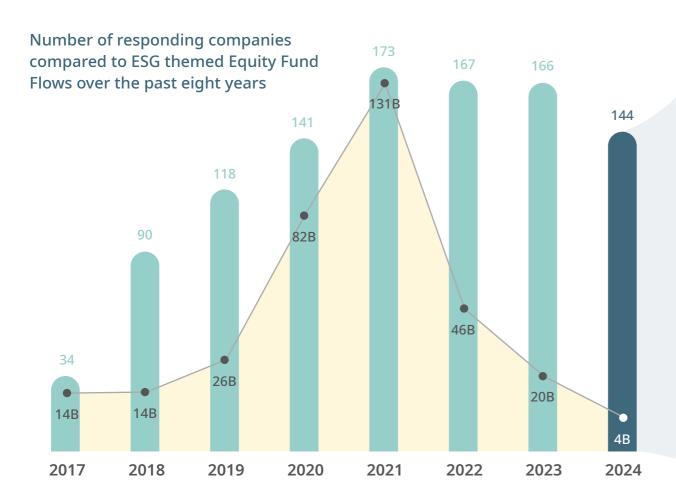




For the eighth year in a row, we saw all economic sectors report to WDI

WDI has demonstrated its ongoing appeal and resilience during its 2024 cycle, attracting 144 submissions

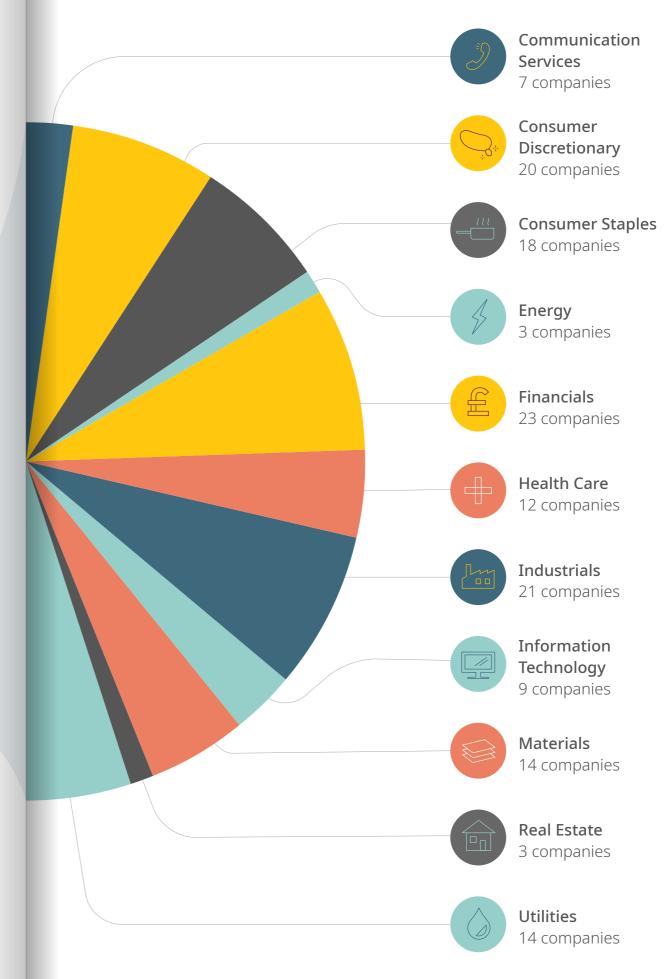
This comes come amid challenging times for corporate ESG and workforce reporting in general. Companies around the world are feeling the pressure of resource constraints due to ongoing financial instability, shifting stakeholder priorities, and value chain disruptions exacerbated by geopolitical tensions. The drop in the number of companies responding to the WDI survey follows a similar trend to ESG-themed equity fund flows on a global level. Both began to decline in 2022, but the drop in fund flows has been much more dramatic due to stakeholders continuing to assess the effectiveness and value of ESG initiatives and reporting.



ESG themed Equity Fund Flows

Number of WDI responding companies

2024 participating companies by sector



Retention was slightly lower this year, mainly due to upcoming mandatory disclosures

As ever, there were companies who have partaken in the WDI survey previously who this year opted not to return. The retention rate in 2024 was 77%, slightly lower than that of last year.

To effectively understand their motivations and challenges, we ask companies who opted not to partake in the WDI survey to share their reasons why. Many cited limited resource and conflicting priorities as a reason. Many also cited waiting for upcoming mandatory reporting requirements as a leading reason. As the US SEC, the EU, and other jurisdictions take strides in developing mandatory sustainability reporting requirements, many businesses are

adopting a wait-and-see approach, delaying voluntary reporting.
However, others view these upcoming mandates as a principal reason for engaging with the WDI, with six companies returning after a hiatus. This may be because the survey's design, which complements and interoperates with other frameworks, allows companies to refine and improve their workforce reporting ahead of mandatory disclosures.

As the "gold standard" of social reporting, therefore, the WDI has ongoing appeal for companies genuinely seeking to understand their impact on their workforce.



Despite these challenges, there have been many positive trends that have emerged from this year's cycle



WDI has received impressive support, with 11 new first-time responder companies joining, enhancing our global representation.

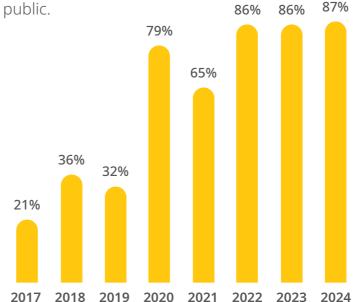
We attracted submissions from 25 different countries, compared to 20 last year

The addition of Indonesia, Ireland, Singapore, South Korea and Taiwan is a positive sign, indicating that our international reach and the respect for our brand as a global initiative is growing.²



Companies opted to make more information public this year than ever before³

While only 38% of the survey is mandatorily made public by the WDI, companies chose to make 87% of information





The Asia region saw stable or increased company disclosure rate throughout the WDI survey

This likely reflects a significant regional drive in ESG accountability and transparency for companies.

The IT sector demonstrated clear improved disclosure

From a sector perspective, companies from the IT sector improved disclosure from an average of 47% to 54% this year.



2024 disclosure scores by section



The business case for WDI

WDI collaborates with companies, investor signatories, lawyers, and civil society leaders to promote adoption of robust, workercentric disclosure standards and ultimately foster more responsible business practices. The survey is continuously updated to encourage greater company disclosure around emerging, evolving and challenging areas of workforce practices.

To ensure value-add, the WDI ensures that the survey aligns with other major disclosure frameworks and regulations. This reduces the reporting burden on companies. The WDI survey questions are mapped against:

























Specifically, the WDI aligns with the following Sustainable Development Goals:































Alignment with standard setters

WDI often works closely with standard setters, sharing knowledge and expertise on workforce metrics. Over the last year, WDI contributed to the ISSB's development of its 2-year work plan by coordinating a comprehensive investorbacked response to the ISSB's 2023 Consultation on Agenda Priorities. Here we set out how important it was for the standard setting body to prioritise research into social topics.

WDI also has a close level of alignment with mandatory reporting laws around the world, including most recently the Business Responsibility and Sustainable Reporting (BRSR) regulations mandated by the Securities and Exchange Board of India (SEBI), which WDI's core indicators have a 48% alignment with. This legislation was first rolled out in 2023/24 for the top 250 listed entities and eventually will include the top 1000 listed entities by 2026/27.

Unique insights

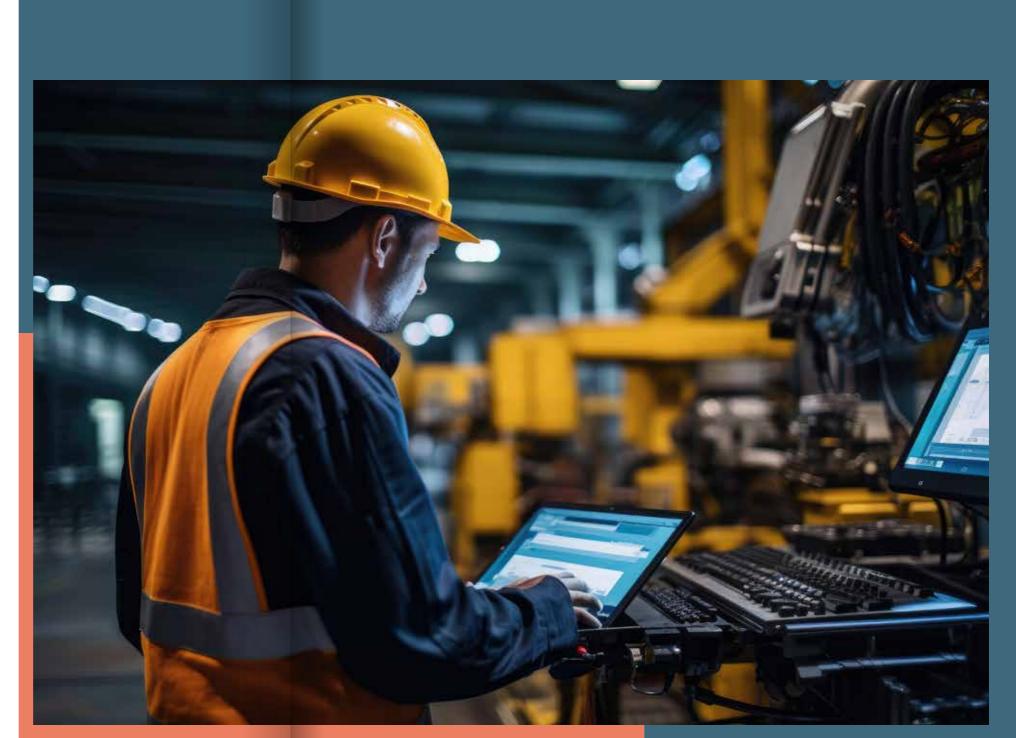
While the WDI aims to align with other disclosure frameworks, its unique strength lies in its comprehensive coverage of workforce issues, which surpasses other frameworks. This is because the WDI methodology takes a broad approach to traditional business risks, encompassing a wide range of impacts organisations have on their workforce, both within their direct operations and across the supply chain.

Value-add

By participating in the WDI survey, companies identify blind spots and improve performance by providing unique insights into social activities, enhancing workforce conditions, and upholding worker rights. Participation also demonstrates that companies are industry leaders due to their commitment to transparency, ethics, and accountability. Through this they can build trust with stakeholders, attract top talent, and secure long-term investor confidence.

Thought leadership

WDI investor signatories are thought leaders on responsible investment when it comes to workforce issues. Through the initiative, investors partake in roundtables, workshops and webinars on workforce issues. They also play an active role in WDI company selection and survey development, ensuring our resources best reflect investors' strategic priorities.

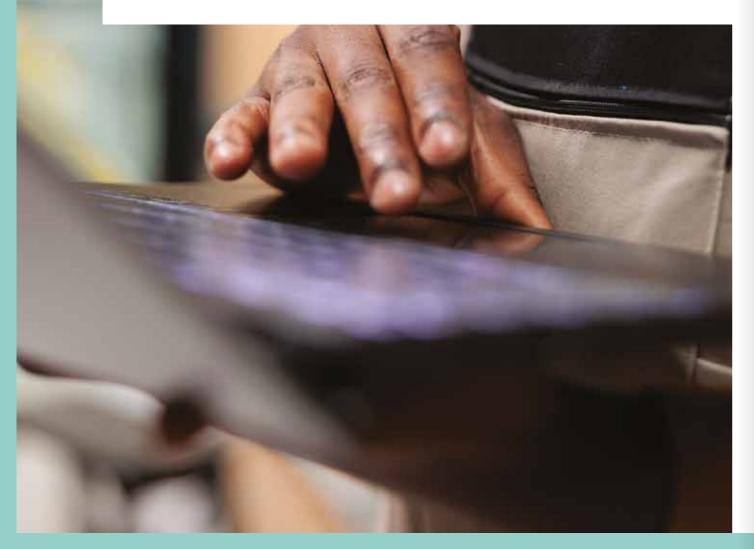




Company case study

Centrica: Driving transparency and investor confidence

Since the inception of the WDI, Centrica has voluntarily participated in its annual submission. This commitment aligns with the company's broader ESG objectives, as workforce matters have become increasingly central to Centrica's corporate responsibility agenda.



The challenge

Traditionally, corporate reporting has emphasised environmental and governance issues, with less focus on social aspects, particularly workforce-related matters. This created a gap in transparency around policies, processes, and performance concerning both employees and supply chain workers. Addressing this gap was essential not only to align with evolving investor expectations but also to demonstrate Centrica's commitment to supporting a fair and inclusive workforce.

The approach

Centrica recognised the potential of the WDI to provide a comprehensive framework for reporting on workforce issues. By participating in WDI's annual submission, Centrica sought to enhance its disclosures, focusing on key areas such as Diversity, Equity, and Inclusion (DEI), the Just Transition, and the implications of emerging technologies like Gen-AI. The WDI survey's adaptive structure allowed Centrica to continually refine its workforce reporting practices. This dynamic approach enabled the company to incorporate new insights and align its policies with industry best practices. Importantly, the WDI's structure has facilitated Centrica's readiness for compliance with the Corporate Sustainability Reporting Directive (CSRD), positioning the company as a leader in workforce transparency.

The outcome

- Improved Workforce Reporting: The initiative has helped Centrica better articulate its workforce policies and actions, enhancing the company's ability to report in a structured and comprehensive manner.
- Investor Confidence: Through the provision of comparable data on workforce issues, Centrica has supplied investors with the insights needed to make informed decisions regarding partnerships and investments.
- Alignment with Regulatory Standards:
 Participation in the WDI has also supported Centrica's preparedness for upcoming regulatory requirements, notably CSRD, further reinforcing the company's commitment to ESG principles.

WDI operates successfully not just by bringing value to companies, but also to investors. By generating a broader range of high-quality workforce data from more organisations, the WDI enables its investor signatories to drive improvements in corporate workforce policies and practices. Investors gain access to company data across 13 survey sections, covering wage levels, health and safety, workers' rights, and training and development.

Investor case study

Quantum

Quantum introduced and adopted an integrity screen to filter out unsuitable actors from its investments in 1996. The initial integrity screen, comprising 10-15 parameters, proved useful in navigating governance issues in the Indian markets. As the aspects of sustainability evolved, Quantum began incorporating additional integrity parameters, focusing more granularly on governance, social, and environmental aspects, ultimately developing a +200 parameter integrity check in 2015.



While the integrity screen has continued to evolve towards greater effectiveness, Quantum sought to deepen its understanding of workforce-related aspects and was introduced to the Workforce Disclosure Initiative (WDI).

In November 2020, Quantum became the first Indian firm to join the Workforce Disclosure Initiative (WDI). The objective was to reflect internally, gaining a comprehensive understanding of workforce-related issues from an expert organization that delves deeply into these aspects and drives researchled practical outcomes. These in-depth insights have significantly influenced the company's thought process.

The WDI assessment extends beyond a simple checklist approach, scrutinizing key areas such as human capital development, human rights, diversity and inclusion, supply chain, and health and safety aspects. Quantum's self-assessments have enabled the company to closely examine workforce-related nuances, understand the challenges

faced by companies, and identify the measures needed for improvement. This process has enhanced Quantum's disclosures and practices by identifying gaps and implementing actionable solutions. The company's commitment to periodic reviews has driven continuous improvement.

Over time, through collaboration and learnings, Quantum has refined its integrity screen to enhance its assessment of companies. The company has also leveraged these insights to engage with investee companies, ensuring they are on a path of improvement in terms of disclosures and practices.

Quantum's understanding of various workforce aspects, informed by WDI research and discussions with the WDI team, has enabled the company to identify the right measures and avoid any attempts by corporates at greenwashing, gender washing, or hog washing, thereby making its assessments more robust.

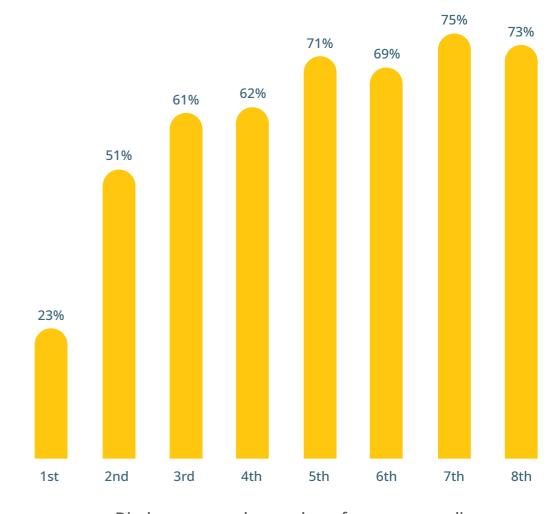
Initiatives like WDI play a crucial role in providing the necessary expertise and tools to help governments, regulators, and investors gain comprehensive knowledge and answers to emerging questions as they progress towards embracing sustainability.

Quantum values its partnership with WDI, which has helped evolve its thinking on various workforcerelated issues. In turn, Quantum has contributed an emerging market perspective to guide WDI's research and create solutions that help measure, assess, and improve workforce aspects.





The longer companies take part in the WDI, the more of the survey they complete⁴



Disclosure score by number of years responding

The survey is designed to challenge companies' workforce data collection. As a result, 62% of the total survey was completed in 2024 on average. Participation in the survey helps companies to think about the data they collect, how they manage their workforce and how this could be improved in the future.

Crucially, the longer companies partake in the WDI survey, the more data they are able – or willing to provide. Second-time responders provided more than double the data submitted by first-time responders, and more than three times as much as information non-responders are publishing. Meanwhile those who have participated for eight years running provided 73% of the data, more than three times as much as first-time responders.

Key 2024 workforce trends

The global workforce is currently undergoing significant changes, exposing workers to new risks and opportunities while exacerbating existing ones. Global transformations (including the rise of automation and the net-zero transition) offer opportunities for workers worldwide while also endangering certain areas of employment.

Rising geopolitical instability is having a heavy impact on the global workforce, with over 95 million people now either refugees or having been internally displaced because of violent conflict, heightening their chances of being exploited.⁵ The rise of the gig-economy also poses fresh risks and opportunities to workers through its volatile and transient nature of work. Many of these factors are colluding to exacerbate global inequality, with recent research finding that 4.8 billion people have become poorer than they were in 2019.⁶



The rise of the gig-economy

The rise of the gig economy is reshaping working patterns and raising questions about business responsibilities towards employees. Companies are increasingly using contingent workers to meet talent gaps and for cost efficiency amidst economic uncertainties. There has been growing concern over this subsect of workers, as they are often more at risk of worker rights abuses due to the lack of protections and benefits that permanent employees receive, such as health insurance, paid leave, and job security. Comprehensive workforce reporting can spotlight these vulnerabilities and encourage businesses to safeguard gig workers' rights. Research from Vienna University of Economics and Business suggests that a large gig economy harms wage growth for all and has led to a wage growth slowdown in Europe. By leveraging workforce data, businesses can ensure more fair treatment and better working conditions for gig workers, ultimately contributing to a more sustainable and profitable labour market.7

Global transformations are rapidly changing how the global workforce operates

This is particularly the case when it comes to the transition to automation and to a net-zero economy. Many organisations are using AI to help streamline the workforce, such as BT which aims to replace 10,000 staff with AI within 7 years.8 In some cases, AI is also exacerbating global inequalities by increasing skill disparities, displacing low-skilled workers, and perpetuating biases in AI systems. Research shows AI investment boosts income for the wealthiest households, while leaving lower-income households behind.9 Additional research demonstrates that 82% of businesses are increasing investment in AI, despite half being unclear about its true business impact and the roadmap for its integration. 10 If companies do not track AI's workforce effects, identify reskilling needs, and ensure equitable AI benefits, they will fail to adequately protect and prepare employees for the technical transition.

Similarly, the shift to a net-zero economy is both creating new jobs, such as in green technology, and threatening jobs reliant on fossil fuels. The International Energy Agency estimates that nearly \$5 trillion in annual investment is needed by 2030 to achieve net-zero emissions. To navigate these changes, companies must invest in training and reskilling employees to ensure an equitable transition and workforce sustainability.





Mass displacement affecting company HRDD

The Global Peace Index (GPI) reported 56 active conflicts in 2024, the most since the end of World War II. A resulting 95 million people are now either refugees or have been internally displaced. Climate change is also contributing to mass displacement, with a predicted 216 million people having to migrate within their own countries by 2050. Displaced populations, such as refugees and internally displaced persons, are particularly vulnerable to trafficking and forced labour due to their precarious situations and lack of legal protections. A recent case study on Sudan, for example, found that key risk factors for trafficking include lack of protection, widespread displacement, limited access to education and health services, and precarious food security, all resulting from conflict-induced forced displacement.

This has increased pressure on companies to enhance their HRDD processes and workforce protections across value chains, ensuring they do not partake in workforce abuse and are actively addressing any issues that arise. Amid rising modern slavery risks, NGOs like Anti-Slavery International have published guidance to help businesses mitigate labour exploitation and improve HRDD processes. Comprehensive HRDD disclosure is crucial for measuring HRDD implementation success and communicating this to stakeholders, helping to build trust and bolster a responsible business reputation.

Shifting stakeholder pressure

The last few years have seen companies face wider pressure from key stakeholders like investors and legislators to improve their HRDD processes and better account for, and protect, their workers, particularly across the value chain. This is primarily manifesting itself through mandatory corporate reporting regulations, such as the Corporate Sustainability Reporting Directive in Europe and the Business Responsibility and Sustainability Report format in India. In this complex climate, reporting on—and taking concrete steps to improve—working conditions is critical for ensuring that workers can access meaningful, rewarding jobs where their human rights are respected. Investors too are recognising the risks and opportunities workforce management poses to a business' long-term stability and is putting pressure on companies to share more comprehensive and comparable workforce and human rights data.

Finally, consumers themselves are exercising their right as stakeholders to demand greater transparency from companies on workforce issues, particularly in those companies which have high customer engagement and high visibility from brand and marketing efforts. Global conflicts often intensify these demands. For example, during recent geopolitical tensions, consumers in various regions have actively boycotted companies perceived as supporting one side of a conflict. Companies like Unilever and McDonald's reported business impacts in several markets where consumer sentiment shifted due to their perceived affiliations with warring countries. This demonstrates how global tensions can have direct consequences on corporate performance and reputations, highlighting the need for businesses to be more attuned to consumer perceptions in a volatile geopolitical landscape.¹⁵

Thematic findings

- While reporting on gender is generally improving, key areas of diversity reporting remain low, including disability and non-binary reporting
- Oversight of direct workforce is improving in certain areas, although crucial gaps remain with the contingent workforce
- For the second year in a row, US disclosures have stagnated or regressed
- Certain key areas of HRDD & value chain transparency are improving
- Companies with a high level of competition and customer exposure tend to have higher disclosure rates
- Regions with increased mandatory reporting requirements often have better disclosure rates



Finding 1

While reporting on gender is generally improving, key areas of diversity reporting remain low, including disability and non-binary reporting



Global frameworks like the United Nations Guiding Principles on Business and Human Rights (UNGPs) and regional laws such as the Gender Pay Gap Reporting regulations in the UK mandate that businesses should ensure equal access to decent work for all employees, irrespective of gender, race, religion, or sexuality. *These factors have collectively driven improvements* in Diversity & Inclusion (D&I) reporting. However, despite these advancements, gender reporting has garnered the most attention from companies and stakeholders, resulting in the most noticeable improvements occurring in this area. Other aspects of diversity, such as race and ethnicity, disability, and non-binary reporting, often do not receive the same level of attention, putting workers in these groups at increased risk of marginalisation.

Gender reporting tends to have the highest level of disclosure across all D&I questions

One contributing factor for this could be prolific awareness and advocacy of the subject. Also, the comparatively straight forward measurability and clear metrics and benchmarks of gender reporting means existing corporate reporting frameworks often prioritise gender diversity, contributing to more robust gender reporting practices.

The WDI survey responses also seem to follow this pattern, particularly in areas of high visibility like the gender divide in leadership positions.



98% of companies were able to provide this data broken down **by gender**



67% of companies were able to provide this data broken down **by ethnicity**



28% of companies were able to provide this data broken down **by disability**

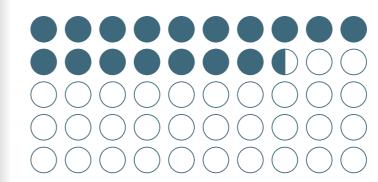




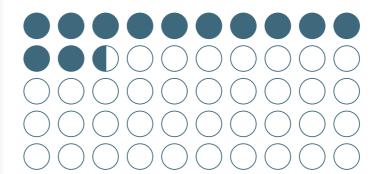
95% of companies were able to provide data on the **overall gender breakdown** of permanent and fixed-term employees within their direct operations.

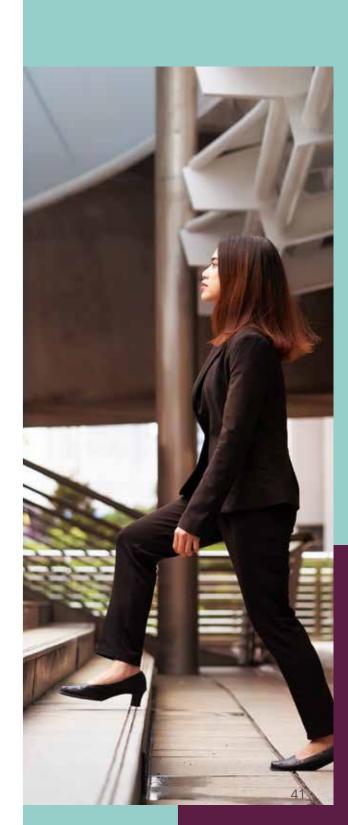
The disclosure rate dropped when it came to reporting the gender composition of contingent and value chain workers.

Only **35%** of companies **provided any data on the gender balance for each contract type within the contingent workforce,** including for contractors, agency workers and franchise workers.



Equally, only **25%** of companies **claimed to collect data on the gender composition of its value chain workforce**.





Positively, there are areas of gender reporting which have improved from 2023.

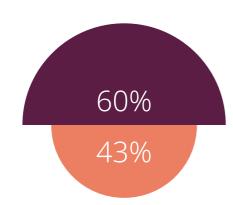
Oversight of gender across the contingent workforce appears to have improved, with **gender data on non-employee direct operations contract** jumping to 35% from 29% in 2023.

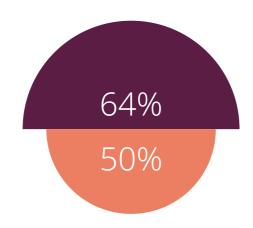
The rate of disclosure has improved slightly when it came to turnover rates, with 43% of companies sharing their involuntary turnover rate for female workers in 2022, 57% in 2023, and 60% in 2024.

There is a similar patten with voluntary turnover, with 50% of companies sharing their involuntary turnover rate for female workers in 2022, 63% in 2023 and 64% in 2024.









This is instrumental data if companies want to achieve equality in their companies, as it speaks to the job security women feel in comparison to men.



The priority of gender reporting over other areas of D&I is particularly evident when it comes to pay gaps.

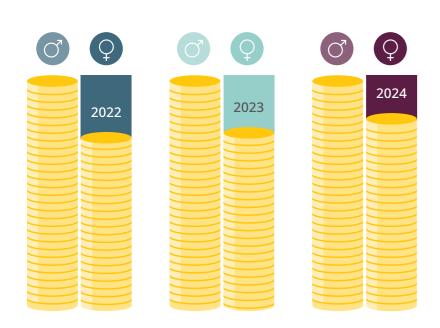
In 2024, 74% of companies disclosed their gender pay gap data, compared to 53% of companies disclosing the race ethnicity pay gap. This drop in the disclosure rate comes despite only 24% companies claiming that they are prohibited from collecting race data.



43

According to the WDI survey, companies are taking steps to close the gender pay gap

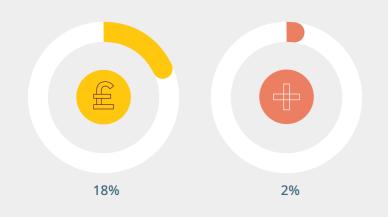
The overall gender pay gap continues to decrease, from 15% in 2022, to 13.7% in 2023 to 10% in 2024.¹⁶

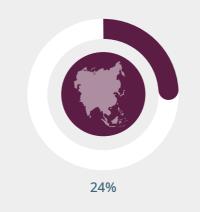


While the averaged overall gender pay gap in 2024 was 10%, the median of gender pay gap was only 6%. This is a positive sign, showing that half of the companies have successfully kept their gender pay gap below 6%. This suggests that many companies are making significant progress in closing the gender pay gap, even though a few companies were pulling the averaged gender pay gap upwards.

It should be noted that gender pay gap differed across sectors and regions.

The financial sector has the highest gender pay gap at 18% on average, and health care companies have the lowest gender pay gap at 2% on average. Regionally, Asia has the worst performance for gender pay gap with 24% on average and 14% of median.



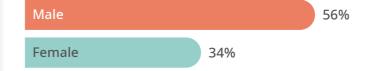


The mean average percentage of female and male employees in the bottom, lower middle, upper middle, and upper pay quartiles.





Upper middle quartile



Lower middle quartile



Bottom quartile

Male		49%
Female	439	6



Despite a strategic awareness of the need for diversity, company disclosure drops when it comes to other aspects of D&I

Many companies are appearing to prioritise diversity at a strategic level.





78% of companies shared detail on what action the company has taken, or intends to take, to improve diversity and inclusion.



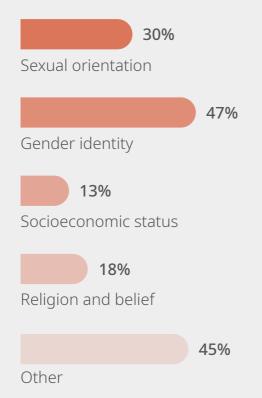
76% of companies claimed to be taking action, or intending to take action, to increase diversity in leadership positions.

77%

77% of companies claimed to have a public policy on discrimination and harassment.

These ambitions, however, are challenging to deliver without appropriate oversight and transparency when it comes to diversity categories in the workforce.

Concerningly, many companies do not appear to have this. To the right is a breakdown of any additional diversity data collected by companies and shows that data collection on other diversity categories to be low.

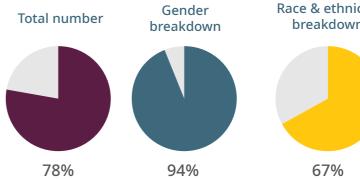


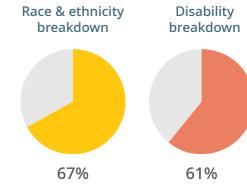
In general ethnicity and disability reporting significantly lag behind reporting figures on age and gender.

This lack of oversight of ethnicity and disability reporting can be detected in the reporting on workforce composition.

Whereas **78%** of companies could provide the total number of employees in the company's direct operations and **94%** could provide at least some information on the overall gender breakdown of their direct operations workforce.

This dropped to **67%** when companies were asked to share the same data by race and ethnicity. The rate of disclosure dropped again to **61%** when companies were asked to provide the percentage of persons with disabilities in the company's total direct operations workforce.





Data collection on gender beyond the binary continues to be low.



While 94% shared data on the percentage of permanent employees in direct operations workforce that were female and 71% for male, just 29% provided the percentage of permanent employees who were non-binary and each of those responded 0%, marking a lack of oversight.



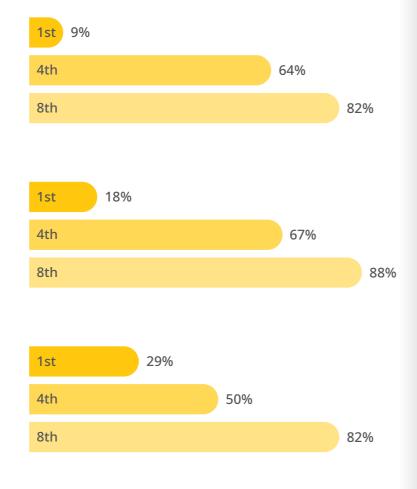
Equally, while 50% of companies shared their internal hire rate for men and women, just 24% of companies did for its non-binary employees, and again their numerical answer was 0%.

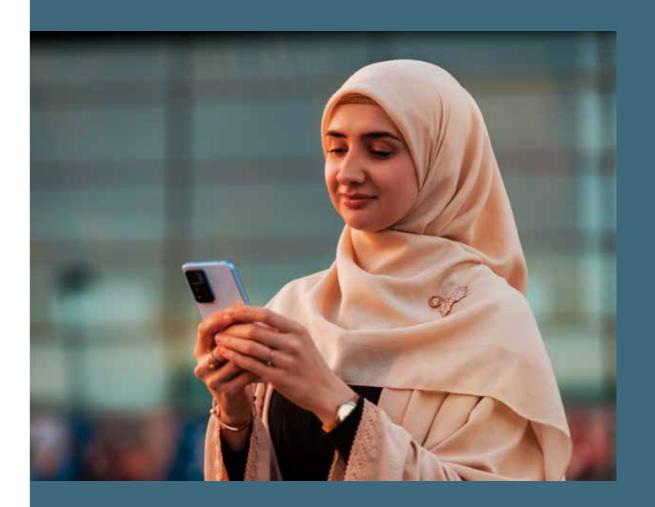
Ethnicity and disability disclosure levels are often affected by the number of times a company has partaken in the survey

9% of first-time responders **provided data on their ethnicity pay gap**, compared to 64% of forth-time responders and 82% of eight-time responders.

18% of first-time responders **provided** data on percentage of the company's total direct operations workforce by race or ethnicity, compared to 67% of forth-time responders and 88% of eight-time responders.

29% of first-time responders **provided**data on the percentage of persons
with disabilities in the company's total
direct operations workforce, compared
to 50% of forth-time responders and
82% of eight-time responders.







Finding 2

Oversight of direct workforce is improving in many areas, although crucial gaps remain with the contingent workforce

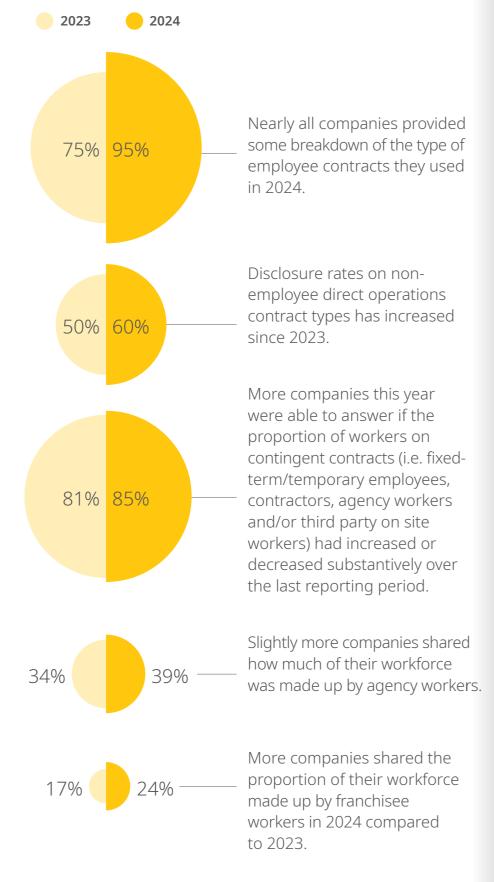


Companies have started to prioritise workforce data, focusing not only on the demographic composition of their workforce but also on employees' access to essential rights, such as a living wage and company grievance mechanisms. Without a complete understanding of the workforce, companies cannot identify which workers are at a higher risk of discrimination or abuse. Recognising these inequalities is crucial for implementing effective changes. One particularly vulnerable subsect of the workforce is those on contingent employment contracts, such as those on short or fixed-term contracts, agency workers, consultants, and freelancers. These workers often have more precarious contract types with reduced access to worker rights. With the rise of the gig economy and an increasing reliance on contingent workers, companies cannot afford blind spots when it comes to this critical subsect of the workforce.

Areas of improved oversight of workforce

Ostensibly, company data collection on many areas of the composition of its workforce, both with direct and non-direct employees, has improved from last year. This is particularly the case with providing a breakdown of workers by contract type.





Company oversight improved when reporting on gender diversity within the workforce.

Gender data on non-employee direct operations contract, for example, jumped to 35% from 29% in 2023



Companies were also marginally better this year at providing gender data for most contract types than in 2023 (above 70% response rate in 2024 for the main employee contract types, vs just below 70% in 2023)



More companies demonstrated an understanding of their workforce's access to crucial worker rights.



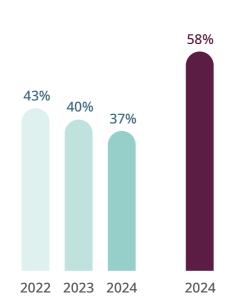
90% of companies provided the percentage of employees covered by collective bargaining agreements for all locations in the direct operations in 2024, compared to 85% in 2023.

This is crucial information because access to collective bargaining is an essential means for workers to address labour issues and facilitate collective solutions to ensure necessary worker rights like fair wages.

Positively, while slightly fewer companies this year (79% compared to 81% in 2023) shared detail on what extent the company pays its employees a living wage or above, significantly more companies (62% in 2024 compared to 56% in 2023) provided detail on how the company is working to improve wage levels for non-employee direct operations workers.

Blind spots when it comes to the contingent workforce, including fixed-term workers¹⁷

In spite of some positive signs of companies increasing their oversight and understanding of their contingent workforce (set out above), there are still concerning data gaps. Such an example includes training data.



Training data around fixed-term workers remains very low: 37% (40% in 2023 and 43% in 2022). These workers can be some of the most vulnerable and employers should be taking responsibility for training and developing them.

Comparatively, training data for permanent employees was significantly higher, with 58% of companies providing the average number of hours of training provided to permanent employees in 2024.



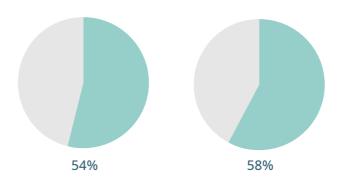
Positively, the difference in hours of training between for permanent employees and fixed-term employees in 2024 was relatively small, with permanent employees receiving an average of 31 hours and fixed-term employees receiving 27.

Recording training data for contractor workers is increasingly important as the use of contractors rises and the global workforce undergoes significant transformations, such as the rise of automation and the transition to net-zero.

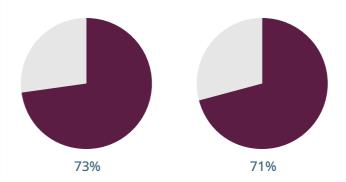
Workforce training is key to preparing the workforce for these transitions and by not recording contractor access to training there is a risk of leaving this subsect behind and exacerbating inequality.

Comprehensive training data ensures that all workers, regardless of employment status, are equipped with the necessary skills to adapt to new technologies and workforce practices, fostering a more sustainable and resilient global workforce.

Crucial areas of health and safety data concerning the contingent workforce are lacking.



There's still not enough information on **ill health and injuries, as well as fatalities for contingent workers**: only 54% and 58% provided information respectively. These are some of the most vulnerable workers with the riskiest work environments so disclosure on this information is important.



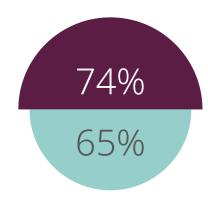
Comparatively, **health and safety data for permanent employees** in 2024 was significantly higher, with 73% of companies reporting the number/rate of recordable work-related injuries or ill health and 71% reporting the number and/or rate of fatalities as a result of work-related injury for permanent employees.

As the use of contingent workers increases globally, companies need to have greater oversight of their health and safety data, including injuries and fatalities. Without this oversight, companies cannot genuinely claim to understand their overall health and safety environment. Moreover, contingent workers often lack the same access to sick pay or union support as permanent employees, making them more vulnerable when incidents do occur.

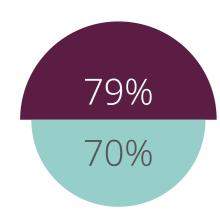


There is a worker rights gap when it comes to the contingent workforce

Many companies demonstrate worse practices when it comes to the contingent workforce.

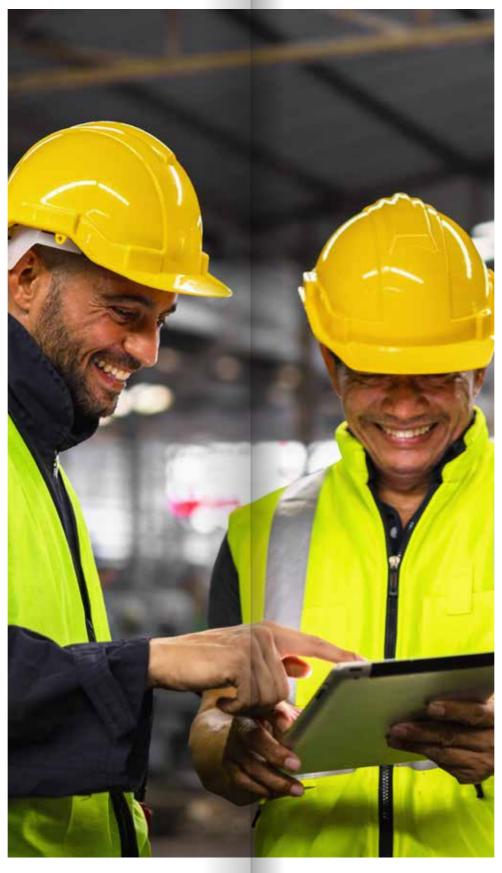


Contingent workers are less likely to have access to company grievance mechanisms or to collective bargaining agreements. 65% of companies claim that contingent workers can access company grievance mechanisms compared to 74% for permanent employees.



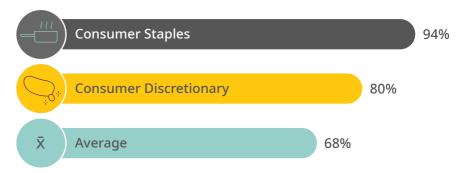
This marks a drop in contingent worker access to company grievance mechanisms from last year, where 70% of companies claim that contingent workers can access company grievance mechanisms, compared to 79% for permanent employees.

Without access to these crucial worker voice mechanisms, workers' position in the workforce become more precarious and insecure. This can be detected in 2024 by the fact that the mean turnover rate for contingent employees was more than double that of permanent workers, with companies having a mean turnover rate of 16% for permanent employees compared to 36% for contingent employees.



There are cases of good practice.

94% of Consumer Staples companies shared information on how the company secures the rights of non-employee direct operations workers to collective bargaining; the Consumer Discretionary sector follows at 80% response rate. This was significantly above the average disclosure rate of 68%.



At a regional level, UK and European countries¹⁸ have the highest response rate on how the company secures the rights of non-employee direct operations workers to collective bargaining, at 77% and 75% respectively.



Eight-time responders had a significantly higher response rate about how the company secures the rights of non-employee direct operations workers to collective bargaining, with just 9% first-time responders providing data, compared to 76% of eight-time responders.



Finding 3

For the second year in a row, US disclosures have stagnated or regressed



In the past decade ESG has been given increasing weight and impetus, with more and more US companies integrating ESG criteria into their business strategies. Parallel to this, resistance to ESG has arisen from subsects of the US business and political community who question the tangible benefits of ESG investments and reporting. Recent Morningstar research has found that investors are continuing to pull money out of sustainable funds in the US at a disproportionally high rate compared to other regions.¹⁹ While this pressure affects all aspects of ESG, it is particularly pronounced when it comes to social topics, where the lack of standardised metrics can make the measurability and comparability of workforce issues challenging. Amid this environment, some US business leaders are deprioritising ESG reporting and are ultimately sharing less social data.

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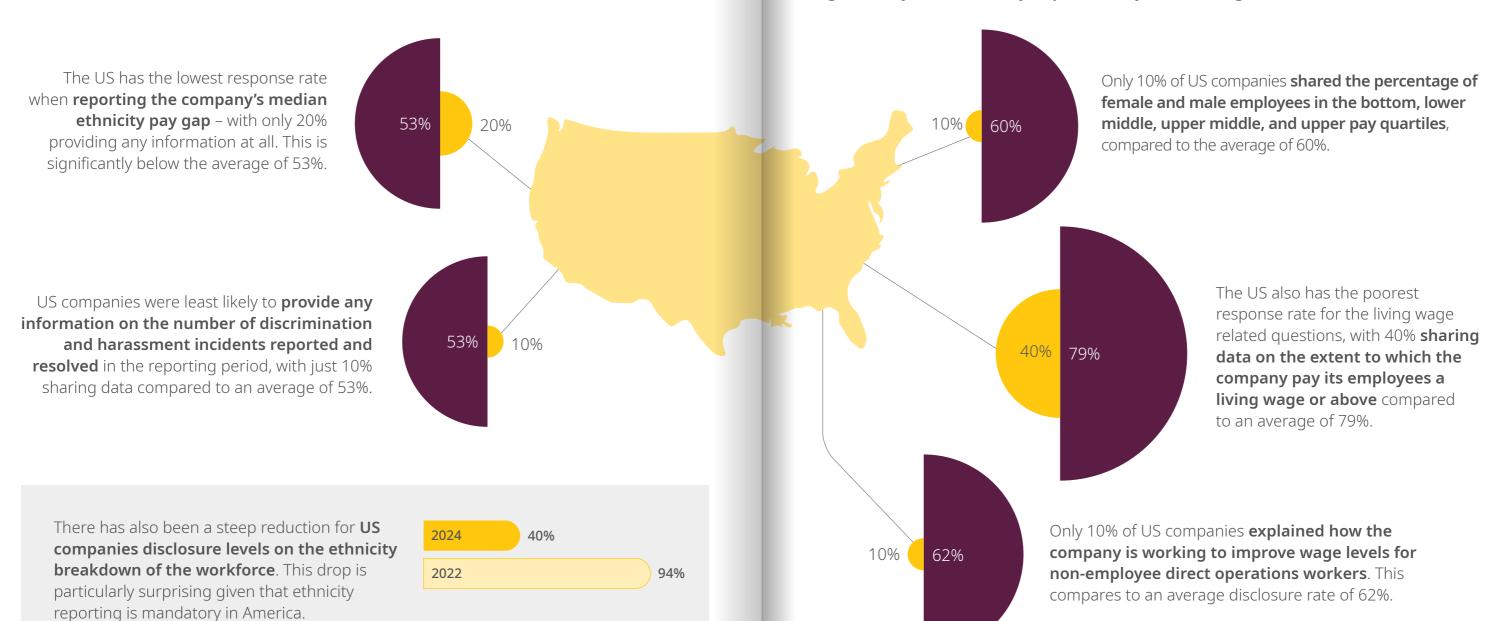
There is a notable drop in US workforce disclosure

Within the US, subsects of the business and investor community question the value-add of ESG initiatives and favour free-market principles which make them adverse – in some cases – to ESG regulation. This movement has gained traction in the past five years and can be detected in recent global sustainable fund flow analysis, which shows that in the second quarter of 2024, the US had an outflow of USD 4.7 billion, the most of any region in the world. The challenging ESG climate in the country could be contributing to the difficulties US companies face in participating in the WDI survey.



This is particularly the case when it comes to ethnicity and diversity reporting.

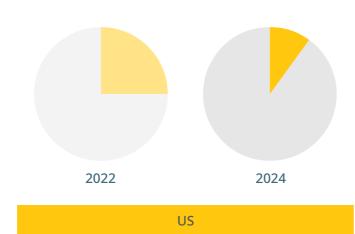
This is a pattern that recurs across the WDI 2024 survey, with US companies significantly the least likely to provide any data on wage levels.



In some cases, workforce practices have also regressed



Fewer US companies claimed to publish the results of their value chain mapping this year, just 10% compared to **25%** in 2022. On average, **47%** of all companies claim to publish their value chain mapping, so this is below average.



It is important to note that disclosure on this topic has dropped across the board, with the rate of those publishing their value chain mapping dropping from 57% in 2023 to 47% in 2024. This could imply that ESG pressure is global and has not just affected US companies.

Publishing value chain mapping is a crucial way of building trust with workers, customers and investors, and is an example of good practice. When it comes to worker voice, there has also been a regression in US companies.



The US has the **mean** of **15%** of employees covered by collective bargaining agreements compared to an average mean for all companies of **51%**.



The **median** in the US is lower at **15%** compared to an average median of **53%**, meaning that half of US companies has less than 15% employees covered by collective bargaining.

The percentage of US employees covered by collective bargaining agreements has dropped by 5% since 2022.



The regression in this section indicates a possible lack of prioritisation of workforce reporting from US companies than in previous years. Many US companies this year, for example, opted to partake only in the core indicators of the WDI survey alluding perhaps to resource constraints or shifting priorities when it comes to reporting on workforce issues.²⁰

Finding 4

Certain key areas of HRDD & value chain transparency are improving



Human Rights Due Diligence (HRDD) is becoming a standard practice for businesses, particularly in regions with robust regulatory frameworks such as the European Union, where legislation like the proposed Corporate Sustainability Due Diligence Directive (CSDDD) mandates comprehensive HRDD processes covering both direct operations and the value chain. There are also numerous national laws mandating due diligence, such as the German Supply Chain Due Diligence Act and Norway's Transparency Act. By implementing HRDD, companies can proactively manage human rights risks, ensuring ethical practices and building trust across their value chains.

Companies are showing a high level of HRDD oversight at a strategic level

The percentage of companies that answered whether or not they carry out regular HRDD has stayed consistently high over recent years:

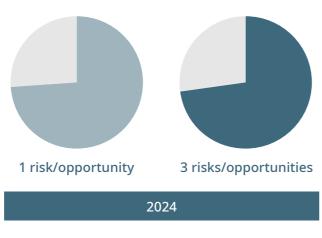


Of those that answered, the percentage of companies that claimed that they do carry out regular HRDD has increased since 2020:



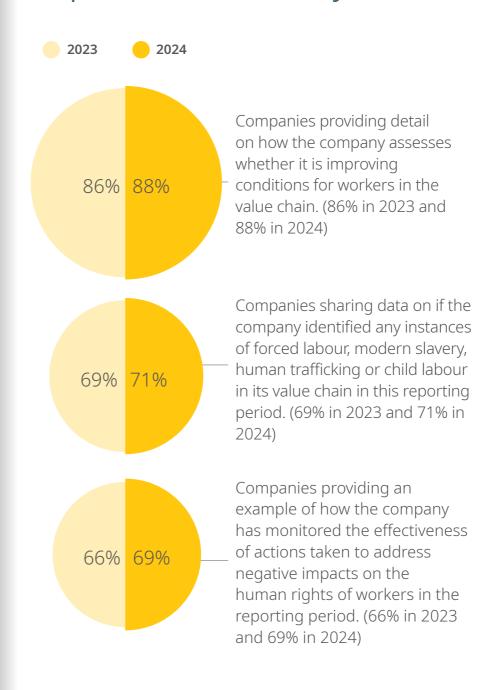
When asked to provide details on salient human rights issues relating to workers' rights in the company's value chain, **only** 7% of companies were unable – or unwilling to answer the question.

Positively, there is not a large drop-off when asking companies to identify **one** and **three** workforce risks/opportunities in its direct operations and/or supply chain. In 2024, 74% identified at least one and 73% identified three. In 2023, 80% identified at least one opportunity and 78% identified three.





There were areas of slight HRDD disclosure improvement from last year



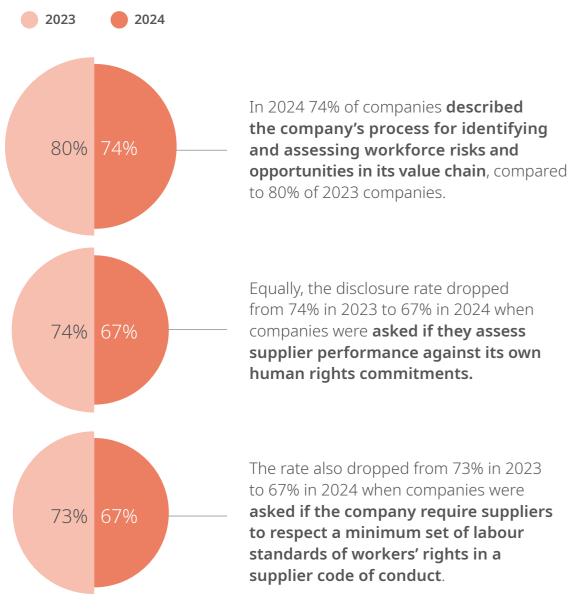
Positively, the rate of disclosure also improved on companies providing the average length of relationship the company has with its direct suppliers, from 43% in 2023 to 45% in 2024.

This was a new question added to the survey last year. As short-lived supplier relationships are a key indicator of the likelihood of poor practices in the value chain, the fact disclosure has gone up from last year is a positive sign.





Despite this improvement, there were other areas where company oversight of working conditions in its value chain had regressed



Disclosure on HRDD processes and practices vary according to sector



Materials firms improved compared to their 2023 cohort in providing actions to salient human rights issues in the value chain. In 2024, 71% of firms provided at least one action; 71% provided at least two and 71% provided three. In 2023, these numbers were lower at 59%, 59% and 59%.



companies there was a big drop-off in companies who provided at least one workforce opportunity between 2024 and 2023. In 2023, 95% of Industrials firms provided at least one opportunity and 85% provided three – in 2024 these numbers dropped to 67% and 62%.



There was a drop-off in IT companies providing categories for their value chain human rights issues. In 2023, for a first, second and third category, the disclosure rates were 92%, 92% and 85% in 2024 the corresponding figures were 70%, 60% and 50%.



Consumer Staples were the best performing sector in providing actions to human rights issues in their value chain in 2024, as they were in 2023. 94% provided at least one action in 2024, compared to 95% in 2023.

A high level of HRDD disclosure does not necessarily correspond with the quality of HRDD processes

While almost all companies claim to carry out HRDD, the effectiveness of the HRDD process is defined by its ability to identify risks to workers within direct operations and across value chains.

It is therefore concerning that in 2024, only 12% of companies claimed to identify any instances of forced labour, modern slavery, human trafficking or child labour in its value chain, despite 71% of companies answering the question.

Given the complexity of global supply chains, it is almost impossible for a company not to have some kind of forced labour in its supply chain.²¹ This data therefore implies that **59%** of companies' HRDD failed to pick up on any of these instances.

A similar thing can be detected in the identification of prison labour within the value chain. Only 8% of companies shared that their HRDD had identified cases of prison labour, despite 66% of companies answering the question.

It is notable that **more than a third (34%) of companies failed to share data on this question at all**, implying they either didn't have this data, or were unwilling to share it publicly.



As publishing this kind of data is a key indicator of a company's commitment to the transparency required to improve working conditions and protect workers, this data omission is dangerous for companies.

Effective HRDD needs worker input to function effectively, yet there is evidence to suggest that companies are not referring enough to worker voice in their HRDD processes.

Worker engagement is the lynchpin of effective HRDD as it allows companies to capture social risks as they happen from the people they are happening to. Regular worker feedback also allows businesses to learn if their human rights policies and initiatives are having any tangible effect on the working conditions of employees across the value chain.



In 2023, the numbers were 91% and 73% respectively.



Finding 5

Companies with a high level of competition and customer exposure tend to have higher disclosure rates



Companies with a high level of competition, including retail and consumer goods companies, often have a greater reliance on brand and marketing to connect with consumers and encourage customer loyalty.

Research from Mckinsey indicates that companies whose primary customers are individual consumers are subject to higher levels of public scrutiny and more often more beholden to public opinion, in many cases resulting in higher levels of transparency. This differs from companies delivering essential services like water and electricity. Due to the critical role they play in public health and safety, and the significant infrastructure required to deliver their services, these companies often have a higher level regulation and significantly less market competition. This shifts their strategic priorities toward safety and reliability and can result in less emphasis on voluntary reporting of workforce and human rights topics.

Finding 5 Finding 5

Throughout the survey, Consumer Discretionary and Consumer Staples companies have a comparatively high disclosure rate



Consumer Discretionary

Average

When responding on governance questions, for example, consumer discretionary companies had an average disclosure rate across all questions of 89%, compared to the average of 75%. This had improved from 2023, where the consumer discretionary sector disclosure rate for governance was 76%.

Consumer staples had the highest disclosure rate across three sections of the survey:

- Worker voice (85%)
- Responsible sourcing (90%)
- Value chain transparency (88%)

It also had the second highest disclosure rate in a further three sections:

- Risk assessment (88%)
- Diversity and inclusion (71%)
- Grievance mechanisms (72%)

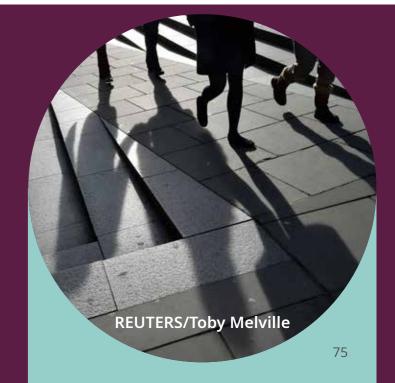


Consumer discretionary and consumer staples companies were the most likely to share what action has the company taken, or intends to take, to improve diversity and inclusion, with a disclosure rate of 90% and 94% respectively, compared to the average disclosure rate of 78%.²³ Utilities companies were least likely to answer this question, with a disclosure rate of 64%.



Consumer discretionary and consumer staples companies have the highest response rate on how the company secure the rights of non-employee direct operations workers to collective bargaining, with an 80% and 94% disclosure rate respectively. This is compared to the average disclosure rate of 68%. Industrial companies were the least likely to respond to this question, with a 52% disclosure rate.

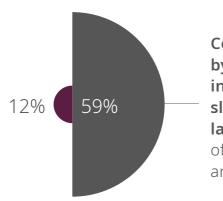




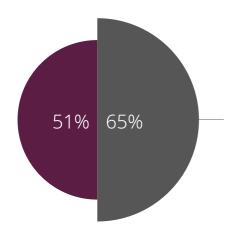
Finding 5 Finding 5

Consumer staples disclosure is particularly high when it comes to disclosure across the value chain.

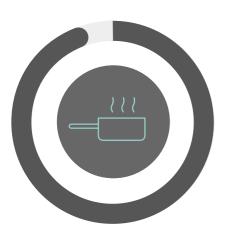




Consumer staples companies were by far the most likely to identify instances of forced labour, modern slavery, human trafficking or child labour in its value chain, with 59% of companies doing so compared to an average of 12%.



Consumer staples companies were the most likely to explain how they are confident prison labour isn't used in the value chain, with a 65% rate compared to the average of 51%.

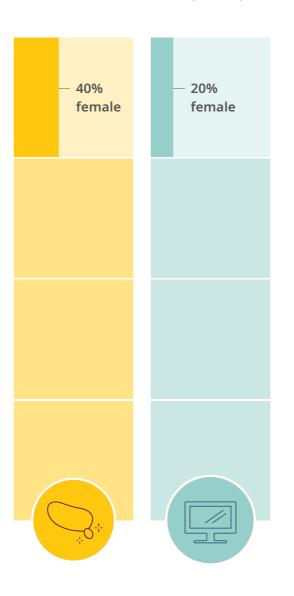


Consumer staples was the best performing sector in **providing at least** one action to address human rights issues in their value chain in 2024 (94%), as they were in 2023 (95%).

In fact, consumer staples companies' disclosure improved here in 2024 with 88% of firms providing at least 3 actions compared to 84% in 2023.



Consumer discretionary companies performed well when it came to pay gaps.



Consumer discretionary companies' gender pay gap was slightly lower than average, at 8% compared to the general average of 10% and appeared to have a lower glass ceiling that other sectors. For example, on average, women made up 40% of the upper pay quartile in consumer discretionary companies, compared to the worst performing sector here (tech) where only 20% females were at upper pay quartile.

Consumer discretionary companies had an average ethnicity pay gap of -3% compared to the general average of 16%. Other sectors with inversed ethnicity pay gaps here was healthcare, with an ethnicity pay gap of -13% and consumer staples with -5%.

This high rate of disclosure may be affected by the fact that consumer goods companies operate in a highly competitive market, where customer demands and preferences play a crucial role in shaping business strategies. These companies are pressured to innovate continuously, respond to trends (like sustainability), and offer competitive pricing to maintain their market share.²⁴

Finding 5 Finding 5

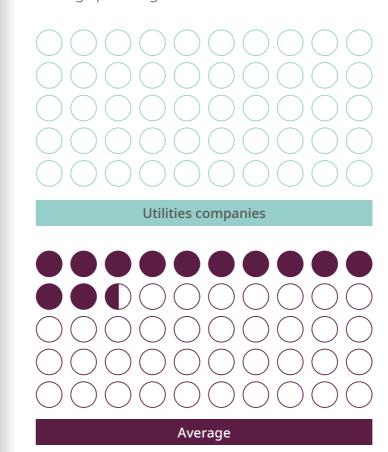
Contrastingly, utilities companies demonstrated low levels of disclosure across the survey

Utilities companies, including those who provide electricity and water, often operate as natural monopolies due to the high infrastructure costs and significant economies of scale involved. Generally, these do not experience the same level of consumer pressure like consumer goods industry.²⁵ This can affect the emphasis these sectors place on voluntary reporting of workforce and human rights topics compared to sharing more pertinent data to do with health, safety and efficiency of services.



There were also data gaps when it came to value chain data.

No utilities companies claimed to collect data on the gender composition of its value chain, significantly below the average of 25%. This is despite utilities companies often having sprawling international value chains.



Only 64% of utilities companies require suppliers to respect a minimum set of labour standards of workers' rights in a supplier code of conduct, or similar.

64% of utilities companies provided details on what action the company has taken to build the capacity of other entities in its value chain to mitigate and manage risks to workers' rights, significantly lower than the average of 72%.



Finding 6

Regions with increased mandatory reporting requirements often have better disclosure rates



Growing public awareness and investor demand has spurred a wave of legislation requiring companies to report on various aspects of their social activities, such as the gender pay gap and efforts to identify and eradicate modern slavery in their value chains. However, this legislation is not uniform and varies across regions. The European Union, for instance, has established of the strongest regulations, such as the EU Non-Financial Reporting Directive (NFRD) and recent Corporate Sustainability Reporting Directive (CSRD). The UK has also maintained robust standards post-Brexit, while India, China, and Australia have all introduced legislation mandating social activity reporting. The positive impact of these legislative measures on reporting practices is evident in the WDI survey, which show improved transparency and accountability among companies in areas which have mandatory disclosure rules.

European and UK companies have demonstrated a comparatively high disclosure rate

Both the European Union and the UK generally have robust corporate disclosure regulations, particularly concerning governance and risk assessment. This is reflected in their above average disclosure levels.

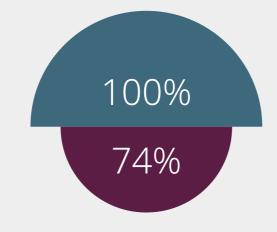
Regionally, European* and UK companies were the best performers when answering governance questions. Across this section, Europe* had an average disclosure rate of 78%, and the UK 87%. Other regions averaged 61%.



Equally, in many cases the European Union and the UK appear to have the greatest oversight of their workforce, both within their direct operations and across the value chain.

European* companies have much better oversight of where in the world their direct operations workers are: 81% of European* companies provided a location breakdown, compared to 57% average for all other regions. This is a key basic metric to understanding an organisation's workforce.

European* and UK firms were also the most likely to report actions to address human rights issues in the value chain, as they were across the whole section typically, with 75% and 85% respectively providing at least one action – compared to an average of 48% elsewhere.

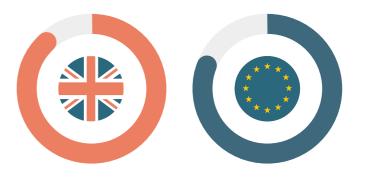


100% of European* companies provided details on the their efforts to map their supply chains (including beyond the first tier). Compared to an average of 74%.

Both the UK and the European Union have regulations mandating that companies report on diversity and inclusion (D&I) and gender-related metrics.

In the EU, the NFRD and CSRD both require large companies to provide data in this area, while the UK's Equality Act 2010 and the Gender Pay Gap Reporting law in 2017 mandates companies to report their gender pay gap.

88% of UK companies and 81% European* companies provided D&I improvement action data, the highest of any region.

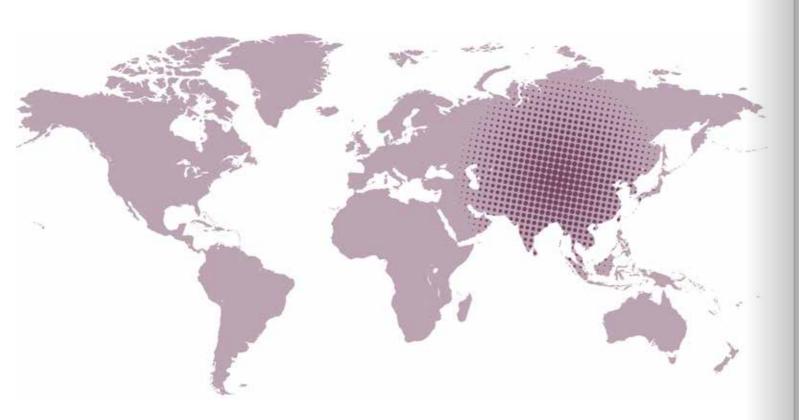


There are positive signs that a strong legislative framework leads to improved D&I results, with the UK leading in terms of gender pay gap with 11% mean and 9% median.

* WDI's definition of "European" throughout this report refers to European countries excluding the UK and Russia.

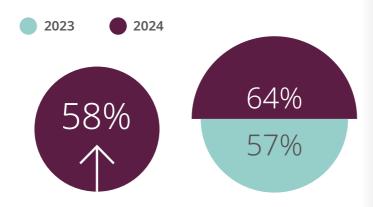


Disclosure in Asia has improved amid increased ESG regulation across the region



There has been a notable increase in legislation and regulatory measures in various Asian countries aimed at improving workforce and human rights corporate reporting, including the Occupational Safety, Health and Working Conditions Code (2020) in India and the Employment Promotion Law of the People's Republic of China (2007).

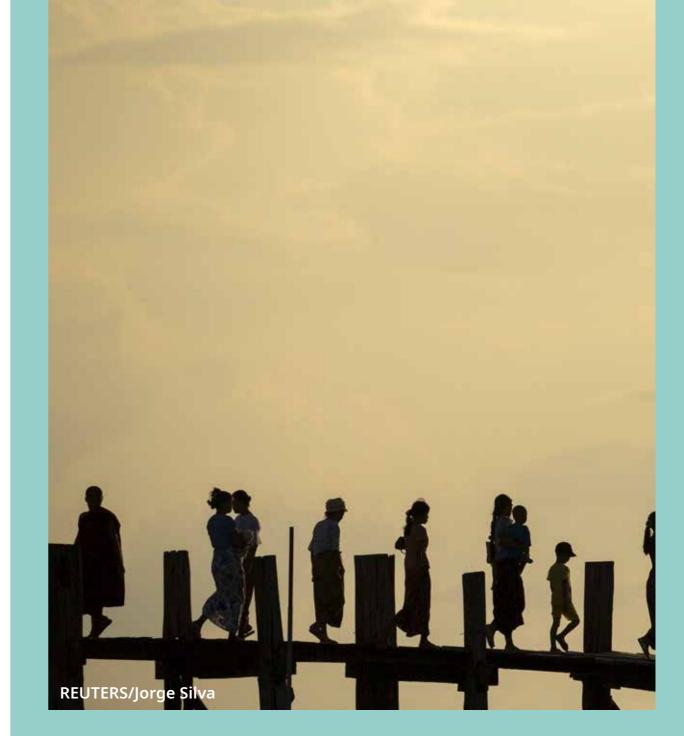
This increased legislative pressure appears to have an impact on company transparency in the region.



The number of Asian companies partaking in the WDI survey this improved from 57% in year is up 58% from last year.

Asian companies' disclosure level 2023 to 64% in 2024.

Overall, Asian companies were the only region to either improve or retain their disclosure levels from last year.





Textual insights

Introduction

This year, we started to experimentally explore the use of Natural Language Processing (NLP) techniques— specifically word frequency generation and sentiment analysis— to extract meaningful insights from the free-text responses provided by companies in our survey. This marks the first time we've applied these methods, aiming to shed light on qualitative data that might have been previously overlooked.

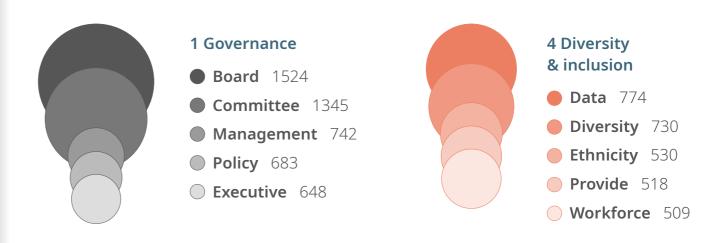
We converted our word frequency analysis into 13 word clouds, each representing a different section of the survey. These visualisations can be found in full in the appendix of this report. The word clouds offer a visual snapshot of the most frequently mentioned keywords across the 13 sections of our survey. By highlighting the top 5 keywords in each section, our word frequency analysis gives a quick and intuitive grasp of the key themes and topics that are on respondents' minds.

Beyond identifying what's being discussed, we also wanted to understand how respondents feel about these topics. That's where sentiment analysis comes in. By assigning sentiment scores to each section, we can see which topics generate more positive or negative emotions. This added layer of insight helps us not just to see the focus areas, but also to gauge the overall mood surrounding them.

The methodologies behind these analyses involved cleaning and processing the text data, applying lemmatisation to normalise the words, and using the VADER sentiment analysis tool to quantify the emotional tone. The result is a clearer, more nuanced understanding of the feedback we've gathered, which we believe will be valuable for investors as they assess the sentiments and priorities expressed by these companies.

diversity inclusion strategy modern bus slavery event diversity inclusion and the strategy modern bus slavery are strategy modern before an are strategy modern bus slavery are strategy modern before an are strategy modern bus slavery are strategy modern

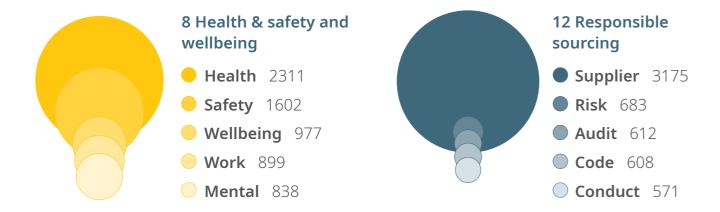
Top 5 most used words per section

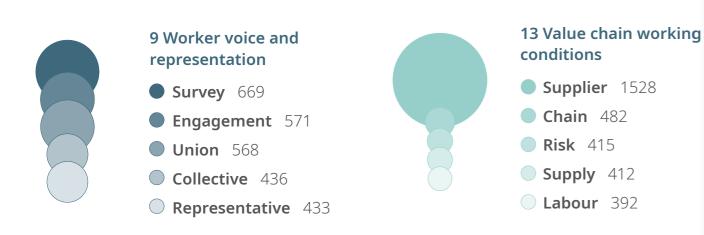


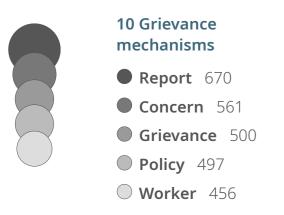












Insights

In 2024, the dominant cross-section themes emerging from the word frequency analysis were governance & risk management, employee wellbeing & development and diversity & inclusion.

Unsurprisingly, risk is a dominant word in each section. Company strategy typically pivots around the minimisation of risk – either actual or potential – to ensure regulatory compliance, stakeholder confidence and sustainable growth. While reference to risk appears in almost every section, however, reference to opportunity is more muted, even in areas like workforce development. This indicates that sourcing workforce opportunities is less of a priority or driving factor for companies than minimising risk.

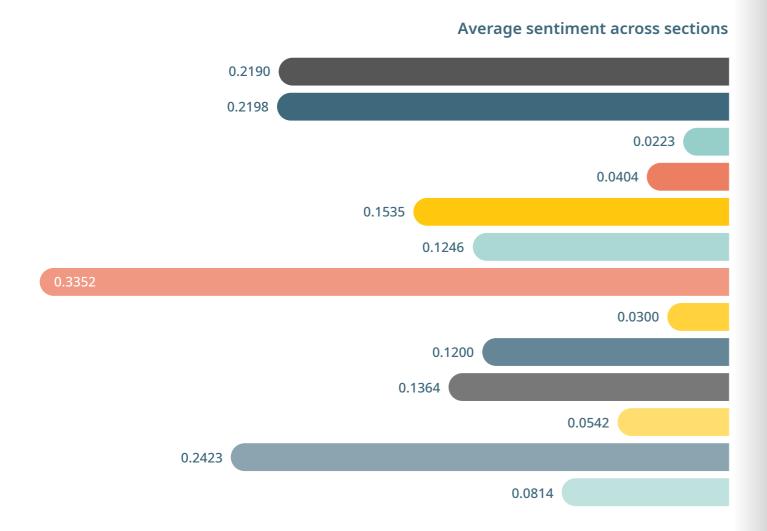
It is a positive sign that reference to employee wellbeing & development was so prevalent throughout the report, as it indicates that most companies are viewing threats to employee wellbeing as a direct threat to business operations. This assumption is a crucial driver leading to companies providing decent work to all its employees. This focus on employee wellbeing has not always been so prevalent, but business leaders are coming to understand that issues like industrial action, high turnover rates and absenteeism have a vast impact on business productivity, thus directly impacting company

profits. This is leading them to view employee wellbeing and development as a priority risk and opportunity to the company.

D&I regularly features as a priority topic for companies when considering the workforce. Many business leaders prioritise diversity for the opportunity it offers to help attract and retain top talent, to enhance innovation and enhance market competitiveness. It is also governed by the need to adhere to various anti-discrimination, inclusivity and human rights regulations and it is a hot button topic with investors and consumers. However, while this D&I focus is ostensibly present as a company priority, this is not always backed up by comprehensive workforce data, marking a disconnect between company strategy and company delivery of that strategy.

Within the sections, there were positive results, such as the high level of focus companies give mental health when discussing employee wellbeing and development, an area historically marginalised. Equally, companies regularly referred to worker access to unions when discussing worker voice. This is reassuring in an era dominated by news stories of big corporations opposing or pressuring unions in a bid to keep labour costs low and avoid potential industrial action.

Sentiment Analysis



Sentiment analysis of each section allows us to understand which aspects of workforce management companies are communicating positively, neutrally and negatively about. This illustrates which aspects companies feel like they understand and view as areas of opportunity, compared to areas which are clearly challenging for companies to collect and analyse data and/or view as areas of potential risk. It is important to note that as companies are using corporate terminology, positive sentiment score will be low and is only useful data in mapping sentiment differences between each section²⁶.

In 2024, companies communicated generally positively, with just one neutral scored section for workforce composition. Within the positive

responses, governance, risk assessment & HRDD, D&I, wage levels & pay gaps, health & safety and value chain transparency were moderately positive, stability, worker voice, grievance mechanism and value chain working conditions were positive, and workforce development & adaption, and responsible souring were very positive.

It's surprising that responses to D&I were only moderately positive, considering it offers businesses significant opportunities for improved recruitment, innovation, services, and results. The neutral tone suggests WDI companies view D&I as both a risk and an opportunity, likely due to politicised backlash, stakeholder pressure, high costs, and challenges in measuring results.

- 1 Governance
- 2 Risk assessment and human rights due diligence
- 3 Workforce composition
- 4 Diversity and inclusion
- 5 Workforce wage levels & pay gaps
- 6 Stability
- 7 Workforce development and adaptation
- 8 Health, safety and wellbeing
- 9 Worker voice and representation
- 10 Grievance mechanisms
- 11 Value chain transparency
- 12 Responsible sourcing
- 13 Value chain working conditions



The high level of sentiment associated with stability is also a positive finding here, as stability is often a marginalised topic when it comes to investors and other stakeholders, despite it being crucial to the long-term sustainability of a company. This increased focus and oversight by companies of staff turnover and employment stability is supported by the fact that the disclosure rate on stability in the WDI survey has gone up significantly to 64% since 2022, prior to which its consistency has some of the lowest disclosure rates in the whole survey.

It is notable that workforce development and adaptation had such a high level of sentiment, given that many view it as a leading risk to the global workforce due to the rapidly evolving nature of work. The rise of automation and the transition to a net-zero economy are changing the way businesses operate and therefore are wreaking significant changes to the skills needed by the global workforce. Without training, companies cannot adequately prepare their workforce for these transformations and so are at risk. It is possible that the positive sentiment is due to there being less established and standardised metrics and language when reporting on these topics. This ambiguity allows companies to use more emotive and optimistic phrasing when discussing workforce development and adaptation.

Appendix

Company selection

In 2024, WDI investor signatories requested that 1,000 of the largest publicly listed companies from around the world take part in the WDI reporting cycle.

Of those 1,000, the WDI team selected 400 'core' companies to receive tailored and focused engagement. With the addition of investor engagement, 421 companies had direct contact with the WDI. For the fifth year in a row, Consumer discretionary was the sector that was the most engaged, receiving 32 tailored investor engagements. US companies were again the 'most engaged' by geography, with 39 investor engagements.

Company selection was based on a combination of:

- Market capitalisation
- Significance of the company (in terms of sector, local market and scale)
- As well as those of that are priorities for the WDI investor group

Number of companies by region

Regional spread	2024	2023	2022	2021	2020	2019	2018	2017
North America	14	19	22	25	23	14	10	4
South/Latin America	3	6	2	3	0	1	0	0
Africa	3	3	2	2	1	1	0	0
Europe (excluding UK)	53	126	128	130	108	91	73	30
Asia	19	12	9	10	4	3	2	0
Australia	0	0	2	3	5	8	5	0
UK	52	66	62	66	56	51	41	23

Top workforce opportunities and human rights issues reported by companies in 2024

Top workforce opportunities

- Diversity and inclusion
- Attracting and retaining talent
- Health & safety and wellbeing

Top workforce risks

- Health & safety and wellbeing
- Human rights
- Diversity and inclusion

Disclosure score by sector

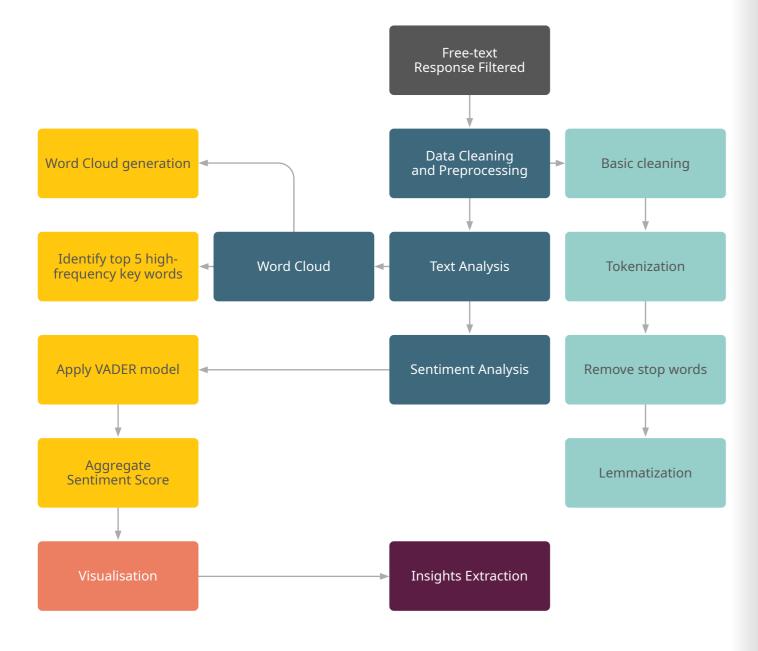
Region	Averaged 2024 disclosure score	Averaged 2023 disclosure score	Averaged 2022 disclosure score
Africa	57%	37%	65%
Asia	64%	57%	63%
Europe (excluding UK)	60%	62%	66%
South/Latin America	52%	47%	88%
North America	67%	42%	55%
UK	73%	71%	75%

Disclosure score by region

Sector	Averaged 2024 disclosure score	Averaged 2023 disclosure score	Averaged 2022 disclosure score
Communication Services	63%	69%	74%
Consumer Discretionary	66%	60%	66%
Consumer Staples	71%	71%	73%
Energy	76%	66%	86%
Financials	62%	64%	67%
Health Care	61%	66%	66%
Industrials	56%	65%	63%
Information Technology	54%	48%	56%
Materials	59%	58%	64%
Real Estate	70%	65%	70%
Utilities	62%	57%	83%

Text Data Exploration

Natural Language Process Methodology



1 Governance



2 Risk assessment and human rights due diligence



3 Workforce composition



4 Diversity and inclusion



5 Workforce wage levels and pay gaps



95

6 Stability

average gender control of new action formation previous year new average gender control of new action of new actio

7 Workforce development and adaptation



8 Health, safety and wellbeing



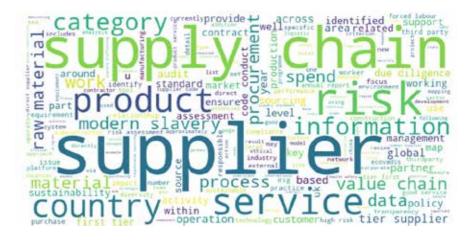
9 Worker voice and representation



10 Grievance mechanisms



11 Value chain transparency



12 Responsible sourcing



13 Value chain working conditions



Participating companies in 2024 and their responses in previous years



Highlighted 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)

Responded

D Declined

? No answer

/ Not requested

Company name	2024	2023	2022	2021	2020	2019	2018	2017
A2A	R	/	/	/	/	/	/	/
ABN Amro	R	?	R	?	?	?	/	/
Acer	R	?	?	/	/	/	/	/
Adani Energy Solutions Limited (AESL)	R	R	/	/	/	/	/	/
Adani Power	R	R	/	/	/	/	/	/
Air Liquide	R	R	R	R	?	?	R	/
Alibaba Group	R	R	D	?	?	?	?	/
Assa Abloy	R	R	R	R	R	R	/	/
Associated British Foods (ABF)	R	R	R	R	R	R	R	R
Assura plc	R	R	/	/	/	/	/	/
AstraZeneca	R	R	R	R	R	R	R	R
AT&T	R	R	R	R	R	R	R	/
Atos	R	R	R	R	R	R	R	/
BAE Systems	R	R	R	R	R	R	R	?
Ball Corporation	R	R	R	R	?	D	/	/
Bank Central Asia	R	?	?	?	/	/	/	/
Bayer	R	R	R	R	R	R	D	/
Beazley	R	R	R	R	R	?	?	/
Berkeley Group	R	R	R	R	R	R	D	/
BNP Paribas	R	R	R	R	R	R	R	/
Bouygues	R	R	?	R	D	D	D	/
British American Tobacco (BAT)	R	R	R	R	R	R	R	R
Burberry	R	R	R	R	R	R	R	R

Canadian National Railway (CN)	R	R	R	R	R	R	R	R
Capgemini	R	R	R	R	R	R	?	/
Carlsberg	R	R	R	R	D	D	D	/
Carrefour	R	R	R	?	?	?	?	?
Cellnex Telecom	R	R	R	R	?	/	/	/
Centrica	R	R	R	R	R	R	R	R
CESC LTD	R	?	/	/	/	/	/	/
CNH Industrial	R	R	R	R	R	R	D	/
Compass Group	R	R	R	R	R	R	R	R
Continental	R	R	R	?	D	?	?	/
ConvaTec	R	R	R	R	R	R	R	/
Cosco Shipping Ports	R	R	/	/	/	/	/	/
CPFL Energia	R	R	R	?	/	/	/	/
Cranswick	R	R	R	?	R	R	R	/
Crédit Agricole	R	R	R	R	R	?	?	/
Croda International	R	R	R	R	R	R	?	/
CSN	R	R	?	?	/	/	/	/
Danone	R	R	R	?	D	D	D	/
Engie	R	R	R	R	R	?	R	/
Fast Retailing	R	R	R	R	R	?	/	/
Federated Hermes	R	R	?	/	/	/	/	/
Firstsource Solutions Limited	R	/	/	/	/	/	/	/
Fresenius SE & Co. KGaA	R	R	R	R	R	/	/	/
Fresnillo	R	R	R	R	R	?	?	?
GlaxoSmithKline (GSK)	R	R	R	R	R	R	R	R
Grainger	R	R	R	R	R	?	/	/
Greggs	R	R	R	?	D	R	D	/
Hargreaves Lansdown	R	R	R	R	R	R	R	/
Helios Towers	R	R	R	R	?	/	/	/
Holcim	R	D	D	?	D	?	R	D
HSBC	R	R	R	?	R	R	R	R
Hyundai Department Store Co.Ltd	R	D	/	/	/	/	/	/

Iberdrola	R	R	R	R	R	R	/	/
IHG (InterContinental Hotels Group)	R	R	R	R	R	R	R	D
Imperial Brands	R	R	R	R	R	R	D	D
Inditex	R	R	R	R	R	R	R	R
Infineon Technologies	R	R	?	?	?	?	?	/
Intel	R	R	R	R	R	R	R	/
International Consolidated Airlines Group	R	R	R	R	R	R	R	R
International Distribution Services	R	R	R	D	?	?	?	/
Investec	R	R	?	?	?	?	?	/
Johnson Matthey	R	R	D	R	D	D	?	/
KBC	R	R	R	D	?	?	?	/
Kering	R	R	R	R	R	R	R	/
Kingfisher	R	R	R	R	R	R	D	/
KPN	R	R	R	R	R	R	/	/
Lanxess	R	R	R	R	/	/	/	/
Loblaw Companies	R	R	R	D	/	/	/	/
LVMH	R	R	R	R	R	R	R	/
Mahindra & Mahindra	R	R	R	R	?	D	D	/
Marks & Spencer (M&S)	R	R	R	R	D	?	D	D
Medtronic	R	?	?	D	D	D	D	/
Meiji Holdings	R	R	?	/	/	/	/	/
Merck Group	R	R	D	D	D	?	/	/
MFS Investment Management	R	R	R	/	/	/	/	/
Microsoft	R	R	R	R	R	R	R	R
Mobico	R	R	R	R	?	?	?	/
Mondi	R	R	R	R	R	R	R	R
MTN Group	R	R	R	R	R	R	?	/
National Grid	R	R	R	R	R	R	D	D
NatWest Group	R	R	R	R	R	R	R	R
Nedbank	R	R	?	?	/	/	/	/
Nestlé	R	R	R	R	R	R	R	R

Nokia	R	R	R	R	R	R	R	/
NVIDIA	R	R	R	R	/	/	/	/
PayPal Holdings	R	R	R	R	R	?	?	/
Pegatron	R	/	/	/	/	/	/	/
PensionBee	R	R	R	R	/	/	/	/
Poste Italiane	R	R	?	/	/	/	/	/
PostNL	R	R	R	R	R	/	/	/
PPHE Hotel Group	R	R	R	?	?	/	/	/
Prudential	R	R	R	R	R	R	R	/
Prysmian	R	R	?	?	?	?	?	/
Puma	R	?	D	R	D	/	/	/
Quantum Advisors	R	R	R	R	/	/	/	/
Reckitt	R	R	R	R	R	R	R	?
RELX	R	R	R	R	R	R	R	R
Rio Tinto	R	R	R	R	R	R	D	D
Rolls-Royce Holdings	R	D	R	R	R	R	R	D
RWE	R	R	D	D	R	R	?	/
Sainsbury's	R	R	R	R	R	R	R	R
Sampo OYJ	R	R	R	?	?	?	?	/
Sanofi	R	R	D	R	R	R	R	/
Saregama	R	/	/	/	/	/	/	/
Sartorius Stedim Biotech	R	R	R	/	/	/	/	/
Schneider Electric	R	R	R	R	R	R	R	/
Schroders	R	R	R	/	/	/	/	/
SEGRO	R	R	R	R	R	R	R	/
Serco Group	R	R	?	?	?	?	?	/
Seven & i Holdings	R	R	R	R	?	?	?	/
Severn Trent	R	R	?	?	?	?	?	/
Sika	R	R	D	?	D	D	?	/
Snam	R	R	?	/	/	/	/	/
Sodexo	R	R	R	R	R	R	R	/
Softcat	R	R	R	R	?	/	/	/

Spirax-Sarco Engineering	R	R	R	R	R	/	/	/
SSE	R	R	R	R	R	R	R	R
St. James's Place	R	R	R	R	R	R	?	/
STMicroelectronics	R	R	D	?	?	?	?	/
Sun Art Retail Group	R	R	R	/	/	/	/	/
Tecan	R	R	R	/	/	/	/	/
Teck	R	R	R	R	R	D	/	/
Telecom Plus	R	R	/	/	/	/	/	/
Telefónica	R	R	R	R	R	?	?	/
Teleperformance	R	D	R	R	/	/	/	/
Tesco	R	R	R	R	R	R	D	D
The Gym Group	R	D	D	R	?	/	/	/
Top Glove	R	/	/	/	/	/	/	/
TotalEnergies	R	R	R	R	R	?	?	/
Tyson Foods	R	R	R	R	R	R	?	/
UCB	R	R	R	R	R	D	?	/
Umicore	R	R	R	R	R	D	/	/
United Utilities	R	R	R	R	R	R	R	/
UnitedHealth	R	?	?	?	?	D	?	/
UPM-Kymmene	R	R	R	R	R	R	?	/
Veolia	R	R	R	R	R	R	R	/
Vinci	R	R	R	R	R	R	?	R
Visa	R	R	R	R	R	?	?	/
Vodafone	R	R	R	R	R	?	D	D
Waste Connections	R	R	R	R	R	?	/	/
XP Power	R	R	/	/	/	/	/	/

Endnotes

- 1 Company selection was based on a combination of: Market capitalisation, significance of the company (in terms of sector, local market and scale) as well as those of that are priorities for the WDI investor group
- 2 Despite there being six new countries partaking in the survey, the overall number is 25 due to Luxembourg dropping out
- 3 For all questions which aren't marked as "mandatory public", companies have the choice to submit their answer publicly or to the signatory investor group only. Data submitted in this way is only available to WDI investor signatories to help focus engagement activities, inform voting policies and decisions, and further support wider research objectives related to investment portfolios. The full data set is also used by the WDI team in its analysis, reports, and research.
- 4 For all questions which aren't marked as "mandatory public", companies have the choice to submit their answer publicly or to the signatory investor group only. Data submitted in this way is only available to WDI investor signatories to help focus engagement activities, inform voting policies and decisions, and further support wider research objectives related to investment portfolios. The full data set is also used by the WDI team in its analysis, reports, and research.
- Walk Free. (2024). Modern slavery risks rise as greatest number of global conflicts since WWII. https://www.walkfree.org/news/2024/modern-slavery-risks-rise-as-greatest-number-of-global-conflicts-since-wwii/
- 6 World Economic Forum. (2024, February). Inequality in developing countries: Women and the economy. https://www.weforum.org/agenda/2024/02/inequality-developing-countries-women-oxfam/
- 7 London Loves Business. (2024). Gig economy jobs stifle wage growth across Europe. https://londonlovesbusiness.com/gig-economy-jobs-stifle-wage-growth-across-europe/
- 8 The Guardian. (2023, May 18). BT to cut jobs: Telecoms group reduces workforce. https://www.theguardian.com/business/2023/may/18/bt-cut-jobs-telecoms-group-workforce
- 9 Bank for International Settlements. (2024). On the international consequences of the rise in global interest rates: BIS Working Papers No. 1135 (p.3). https://www.bis.org/publ/work1135.pdf
- 10 IT Brief. (2024). Half of businesses unclear on AI impact despite high investment. https://itbrief.co.uk/story/half-of-businesses-unclear-on-ai-impact-despite-high-investment
- 11 McKinsey & Company. (2024). Our future lives and livelihoods: Sustainable, inclusive, and growing. https://www.mckinsey.com/featured-insights/sustainable-inclusive-growth/our-future-lives-and-livelihoods-sustainable-and-inclusive-and-growing
- 12 World Bank. (2023, December 18). 2023 in nine charts: A growing inequality. https://www.worldbank.org/en/news/feature/2023/12/18/2023-in-nine-charts-a-growing-inequality
- 13 Global Partners Governance. (2024, August). Impact of conflict on modern slavery and human trafficking in Sudan. https://gpgovernance.net/wp-content/uploads/2024/08/Impact-of-Conflict-on-MSHT-in-Sudan_EN-Aug2024.pdf

- 14 Anti-Slavery International. (2023). HRDD guidance: Addressing modern slavery in global supply chains (Final version). https://www.antislavery.org/wp-content/ uploads/2023/05/HRDD_Guidance_FINALsm2.pdf
- 15 Reuters. (2024, September 4). From apartheid to Gaza, consumer boycotts have hit major companies over the years. https://www.reuters.com/business/retail-consumer/apartheid-gaza-consumer-boycotts-have-hit-major-companies-over-years-2024-09-04/
- 16 Since WDI transferred to the Thomson Reuters
 Foundation, we have identified a minor error in gender
 pay gap data submitted prior to the initiative's transfer.
 Due to inconsistencies in how companies responded to
 the gender pay gap question, WDI reports for 2017 2022
 overestimated the average gender pay gap of participating
 companies. We have reanalysed the data for 2023 and
 2024 and provided corrected figures in this report,
 including an accurate yearly comparison. If you have any
 questions, please get in touch with wdi.trust.org
- 17 The contingent workforce refers to those workers not on a permanent contract i.e. those who are hired on a perproject or fixed-term basis. Contingent workers include fixed-term/temporary workers, non-guaranteed hours employees, contractors, agency workers and any third party on site workers not on a fixed-term contract.
- 18 WDI's definition of "European countries" in this instance and throughout the report refers to European countries excluding the UK and Russia.
- 19 Morningstar. (2024). Global ESG flows. https://assets.contentstack.io/v3/assets/blt4eb669caa7dc65b2/blt18dd898943dd6d27/66abf0adb3480c965b14d575/Global ESG Flows Q2 2024 Report (2).pdf
- 20 It is important to note here that this data drop does not necessarily translate to a lack of oversight from North American (specifically US) companies, rather it suggests that many US companies have opted this year to partake only in the core indicators of the WDI survey, so their disclosure levels drop for that reason. Instead, it may speak more to a strategic decision from US companies are making not to prioritise transparency over workforce issues within the current climate.
- 21 CCLA. (2020). Engagement expectations: Find it, fix it, prevent it An investor project to tackle modern slavery (p. 4). https://www.ccla.co.uk/documents/modern-slaveryengagement-expectations/download?inline=true]
- 22 McKinsey & Company. (2024). How to prepare for a sustainable future along the value chain. https://www.mckinsey.com/industries/consumer-packaged-goods/our-insights/how-to-prepare-for-a-sustainable-future-along-the-value-chain
- 23 WDI has removed energy (disclosure rate of 100%) due to the smallness of its sample size
- 24 McKinsey & Company. (2024). How to prepare for a sustainable future along the value chain. https://www.mckinsey.com/industries/consumer-packaged-goods/our-insights/how-to-prepare-for-a-sustainable-future-along-the-value-chain
- 25 Investopedia. (n.d.). How strongly does government regulation impact the utilities sector? https://www.investopedia.com/ask/answers/070915/how-strongly-does-government-regulation-impact-utilities-sector.asp
- 26 Scores for the sentiment analysis range from a minimum of -1 to a maximum of 1

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