

Mary Jo White, Chair  
Keith Higgins, Director Corporation Finance Division  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549

14 April 2015

**Subject: Feedback by GRI on the U.S. SEC Disclosure Effectiveness Review**

GRI would like to provide input for the ongoing revision of the disclosure requirements in Regulation S-K and Regulation S-X by the SEC Division of Corporation Finance.

GRI is the world's largest and most widely used standard in the field of non-financial reporting. While the SEC review does not explicitly focus on non-financial reporting, GRI believes that corporations can only provide a complete view of their risks and impacts by addressing both financial and non-financial aspects of their business. The 2015 World Economic Forum Global Risks report reinforces this perspective by pointing out that environmental and social risks are likely to occur and also carry with them the most significant negative impacts.<sup>1</sup>

Disclosure on these issues provides critical insights for investor decision-making. Investors require quality, comparable, consistent and relevant data to make informed decisions about investment choices. With thousands of corporate reporters in over 90 countries including the US, GRI is the global standard for such non-financial information. More than 22,000 reports have been registered in GRI's Sustainability Disclosure Database and 25 countries and regions reference GRI in their policies. GRI reporting continues to rise among US companies, especially large multinational firms subject to international disclosure requirements.

GRI's activities are two-fold: to produce and maintain the GRI reporting standard and to develop engagement activities, products and partnerships to enhance the value of non-financial reporting for organizations around the world.

The GRI Standard is developed via a multi-stakeholder process and is updated based on the needs of key stakeholders groups, including investors. The GRI Standard offers Reporting Principles relating to report quality and content, and Standard Disclosures (including indicators) for the preparation of sustainability reports by organizations, regardless of their size, sector or location. The GRI standard is developed in order to streamline reporting efforts and to minimize administrative burdens. In order to meet the needs of investors for consistent and comparable data, the GRI Content Index<sup>2</sup> serves as a useful navigation tool.

<sup>1</sup> WEF Insight report: Global Risks 2015 [http://www3.weforum.org/docs/WEF\\_Global\\_Risks\\_2015\\_Report.pdf](http://www3.weforum.org/docs/WEF_Global_Risks_2015_Report.pdf)

<sup>2</sup> <https://www.globalreporting.org/resource/library/Information-GRI-Content-Index.pdf>

While the majority of publicly traded companies are not issuing public reports about their material sustainability performance and impacts, the practice of reporting on sustainability information has become mainstream among the world's largest multinational companies, including those in America, and the practice is gaining acceptance throughout the world<sup>3</sup>

The ongoing review process on the Disclosure Effectiveness offers an opportunity to engage and support SEC in examining how non-financial information is relevant to investors as well as to listed companies. GRI looks forward to engaging in a dialogue with the SEC on this subject and providing any input or advice related to this vital review process.

Yours sincerely,

A handwritten signature in blue ink, consisting of a large, stylized 'M' followed by a horizontal line extending to the right.

Michael Meehan  
*Chief Executive, GRI*

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<sup>3</sup> The KPMG Survey of Corporate Responsibility Reporting 2013