Equity, Diversity and Inclusion (EDI) Toolkit Resource:
Guide to Developing a Corporate EDI Strategy

MIHR RHIM

MINING INDUSTRY
HUMAN RESOURCES COUNCIL

LEADERSHIP AND STRATEGY

INDICATOR 1

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Guide to Developing a Corporate Equity, Diversity and Inclusion (EDI) Strategy

TSM Equitable, Diverse and Inclusive Workplaces Protocol[1] Relevance:

(Corporate Criteria)   (Facility Criteria)   (Facility Criteria)

This guide helps organizations understand how to meet the requirements described in the TSM Equitable, Diverse and Inclusive Workplaces Protocol. Note that the advice in this guide is generally based on achieving Level A criteria of Indicator 1 of the Protocol. Advice on achieving other criteria levels (B, AA and AAA) is noted throughout where applicable.

What is an EDI Strategy?

- A set of clear objectives, planned actions and evaluative measures that align, direct, structure and resource an organization's EDI efforts.

Why is an EDI Strategy important?

- Supports fulfillment of EDI commitments.

- Integrates EDI across organizational structures and functions.

- Provides for appropriate resource allocation, identifies responsibility centres and designates accountability.

Impacts and Benefits

- Facilitates a cohesive approach to EDI linking values, commitments, policy, process, culture, training, communications, production and performance.

- Enables all organizational stakeholders to understand corporate EDI goals, actions, performance and, importantly to see their role in strategy implementation.

1   See: Towards Sustainable Mining: Equitable, Diverse and Inclusive Workplaces Protocol

EDI are important "strategic priorities and shared values for the mining sector, contributing to safe and respectful workplaces that are free from physical and psychological harm."[2]

Mining companies can leverage EDI to drive innovation, talent attraction and retention, as well as value for investors and other communities of interest. Developing a corporate EDI strategy[3] will help to drive systemic change through clear objectives, planned actions and measurement of results. The strategy shows how the organization integrates EDI into its core priorities, structures, systems and processes and that it is an important, aligned activated corporate value.

To establish an equitable, diverse and inclusive workplace in line with the Mining Association of Canada's Towards Sustainable Mining Program, mining companies can leverage three key tools: the corporate commitment to EDI, a related action plan and a corporate EDI strategy. Through the commitment statement, an organization signals how it approaches EDI and how EDI relates to its core functions. The action plan describes the steps a company will take to turn the commitment into reality and how success will be measured. The corporate EDI strategy sets out the directions and approaches to fulfilling the EDI commitment, including objective setting, resourcing and identifying roles and responsibilities. Combined, these three elements can help companies understand their current state, identify their vision of a future state and map out how to move toward that desired future.

Using this Guide

This guide provides a roadmap for mining industry employers developing a corporate strategy for EDI. A corporate EDI strategy outlines approaches to fulfilling the organization's EDI commitment; developing and implementing action plans with timelines and accountabilities; aligning communications; providing training; and monitoring and evaluating the effectiveness and impacts. The strategy describes how the organization will advance equity, diversity, and inclusion through workplace culture, policies, procedures and practices.

Throughout the process of developing a corporate EDI strategy, consider how to align it with overall organizational strategies and objectives. Proactive employers implement their EDI strategy by providing related supports that inform and empower management and employees to sustain and advance EDI in the workplace.

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2   The Mining Association of Canada, TSM Framework on Equitable, Diverse, and Inclusive Workplaces.
3   Note that some organizations may begin with an initial action plan that may evolve into or become part of a corporate strategy.

TSM EDI Protocol, Indicator 1:
LEADERSHIP AND STRATEGY (Corporate Criteria)

LEVEL B CRITERIA

LEVEL B	CRITERIA 1

CORPORATE COMMITMENT

Making a corporate commitment to EDI is an important step when fostering an equitable, diverse and inclusive workplace culture. The commitment may be expressed as a formal statement or may be a general understanding of how and why the company prioritizes EDI synthesized across different corporate areas, policies, activities and communications, for example. It may also be incorporated into an overarching corporate strategy. Regardless of format, the commitment shapes the company's EDI efforts and directs the next steps, including an action plan.

LEVEL B	CRITERIA 2

ACTION PLAN

The TSM Protocol calls for an action plan regarding how the company will address the criteria of the TSM EDI Protocol, Indicator 1, Level A Criteria involves assessment, identification of gaps, and decision-making. Using the corporate commitment to EDI as a guide, take stock of current corporate efforts (i.e., workplace culture, policies, procedures, and practices) to support an equitable, diverse, and inclusive workplace. Compare the current efforts with those described in the Level A Criteria to identify any gaps. Use the results to inform the decisions needed to meet that level and to move forward.

**TSM EDI Protocol, Indicator 1:
LEADERSHIP AND STRATEGY** (Corporate Criteria)

LEVEL A CRITERIA

LEVEL A	CRITERIA 1

CORPORATE COMMITMENT

Making a corporate commitment that aligns with the TSM Framework on Equitable, Diverse, and Inclusive Workplaces[4] demonstrates a company's strategic priorities and value for EDI. It shows the company's dedication to providing a safe and respectful workplace that is free from physical and psychological harm. A corporate EDI commitment statement describes how and why the company prioritizes equity, diversity and inclusion. It communicates organizational understanding of EDI, the nature of the commitment, the range or scope of application, as well as implementation and accountability measures. An existing corporate EDI strategy may already include a formal EDI Commitment Statement. If not, consider developing a statement to provide clarity to EDI action plans. See the *Tipsheet on How to Develop a Corporate EDI Commitment Statement* for detailed advice.

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4   See TSM Framework on Equitable, Diverse, and Inclusive Workplaces for more detail.

LEVEL A / CRITERIA 2

ENGAGEMENT

The development of a corporate EDI strategy will benefit from engaging multiple voices, including a cross-section of people who bring diverse perspectives and experiences to the process. Internally, engaging corporate leadership, as well as other EDI champions, aids in building buy-in throughout the organization. Assigning a dedicated group or committee for developing the EDI strategy helps to maintain momentum and is another approach. A holistic approach to stakeholder engagement includes seeking input, feedback, or advice from internal and/or external communities of interest,[5] including workers and managers from various internal departments, functions or lines of business and from a cross-section of individuals who bring diverse perspectives and experiences. This approach ensures that important stakeholder voices are heard and considered in the strategy development process and builds buy-in for when finalizing and implementing the strategy.

LEVEL A / CRITERIA 2A

SETTING OBJECTIVES

A corporate EDI strategy includes internal objectives that are supported by actions.

Setting EDI strategy objectives is a process that begins with taking stock of efforts already in place and identifying gaps. Analysis of current EDI efforts against desired outcomes as well as the desired state informs new directions to be taken. A comprehensive set of objectives that incorporates both current and future desired states can then be developed. Manage the expectations of stakeholders by setting realistic objectives that can be accomplished in the timeframe allotted with measurable impacts. A common approach is to use the widely respected SMART goals framework. SMART goals are specific (narrow focus), measurable (quantitative and qualitative targets), achievable (possible), relevant (connected to organizational strategy) and time-bound (set beginning and end dates).

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5   See the *Guide to Community Identity and Collaboration* and the brochure on *Engaging Communities of Interest* for more detailed advice.

Suggested guidelines for developing objectives for a corporate EDI strategy include:

- Review the overall corporate vision and strategy to identify opportunities for building alignment with respect to the EDI strategy, enhancing corporate outcomes.
- Set specific, achievable, measurable objectives based on fulfilling the corporate EDI commitment and aligning with TSM, as appropriate.
- Allocate appropriate budgets and resources to accomplish the objectives, being mindful of other business commitments.
- Plan to integrate EDI into organizational operations by identifying the need for policies, procedures, culture change, training and evaluation.
- Define roles, responsibilities and accountabilities, including leadership portfolios, strategic positions/areas of responsibility as well as committees/groups.
- Engage with and obtain input from a cross-section of individuals who bring diverse perspectives and experiences, including labour organizations, workers and communities of interest.[6]
- Ensure compliance with relevant legislation (e.g., human rights, labour law, occupational health and safety) and reporting requirements (e.g., Environmental, Social and Governance (ESG), public disclosures).
- Address communications, including target audiences and their information needs.
- Establish a review schedule (e.g., annual internal reviews and revising when needed) and report results on progress to leadership.

Long- and Short-Term Objectives

EDI strategy development involves identifying and setting both long- and short-term objectives. While long-term objectives keep efforts focused, short-term objectives ensure continued activity, spur motivation and momentum as well as provide ongoing opportunities for improvement. Long-term strategic objectives are high-level (i.e., big picture) and may take several years to achieve—generally at least three years and potentially longer, up to five years. Short-term objectives align with the long-term strategic objectives but set specific, measurable performance targets that can be achieved within one to two years.

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6   See the *Guide to Community Identity and Collaboration* and the brochure on *Engaging Communities of Interest* for more detailed advice.

Examples of objectives for an organizational EDI strategy include:

Indicator 1, Level A, Criteria 2a:

Internal goal	Increase the proportion of underrepresented groups (i.e., women, Indigenous peoples, persons with disabilities, newcomers, etc.) in the workforce.
Long-term objectives	**Increase the recruitment of underrepresented groups by 10% within five years.** **Measures:** number of applications and hires; annually (quantitative data) **Increase the retention of underrepresented groups with 5+ years service by 10% within five years.** **Measures:** number of workers retained; annually (quantitative data)
Short-term objective	**Establish new relationships with organizations that serve underrepresented groups to enhance and increase job applications by 20% within two years.** **Measures:** number of new organizational relationships and the quality of applicants referred (i.e., that meet the job criteria); every six months (quantitative and qualitative data) **Measures:** number and quality of applications and hires; every six months (quantitative data)

Indicator 1, Level A, Criteria 5:

Internal goal	Decrease the number and severity of EDI-related issues or incidents occurring in the workplace.
Long-term objectives	**Establish a rigorous process of issue reporting, response, resolution and remediation.** **Measures:** yes/no and feedback from complainants; annually (qualitative and quantitative data) **Decrease the number and severity of EDI-related issues or incidents occurring by 50% within five years.** **Measures:** number of issues and type of issue (progressive discipline required- yes/no, discipline and issue severity scale); annually (quantitative data)
Short-term objective	**Decrease the number and severity of EDI-related issues or incidents occurring by 25% within two years.** **Measures:** number of issues and type of issue (progressive discipline required- yes/no, discipline and issue severity scale); every six months (quantitative data) **Reduce the impact of EDI-related issues on individuals.** **Measures:** feedback from individuals impacted including subjects, witnesses and other workers, mental health practitioners every six months (qualitative data) and yes/no re: related programs, such as trauma-informed approaches

LEVEL A | **CRITERIA 2B**

TRAINING AND AWARENESS PROGRAMS

Provide EDI training and awareness programs for all workers and management that support EDI competency development and the corporate EDI objectives. Offering new training as well as refresher learning opportunities helps to raise awareness and set expectations re respectful, inclusive workplace cultures while keeping EDI top-of-mind.

LEVEL A | **CRITERIA 2C**

REVIEW AND REPORTING

Plan for ongoing improvements by establishing a process to regularly review and report on the strategy. The corporate lead for the EDI strategy (e.g., Human Resources, Occupational Health and Safety, Innovation, etc.) can establish a process for collecting data relevant to the short- and long-term EDI objectives. Plan to review the results of the corporate EDI strategy regularly, with an annual review at minimum. Engage with and obtain input during the strategy review from a cross-section of individuals who bring diverse perspectives and experiences, including labour organizations, workers and communities of interest,[7] to ensure relevance and enhance buy-in. Those involved in data collection will want to know the nature of the data requested, the format and the schedule of reporting.[8] The results of the annual review undertaken by management are shared with the corporate leadership to ensure they remain up-to-date with progress against EDI objectives and are prepared to address any needed implementation changes. The findings of each review will show patterns that can help to establish benchmarks and future targets.[9]

LEVEL A | **CRITERIA 2D**

ROLES AND RESPONSIBILITIES

An initial mapping of ideas about roles, responsibilities, accountabilities and resources will reveal current strengths as well as gaps. A suggested approach for planning is to create a chart with space for:

- High-level goals (which could reflect desired outcomes).
- Objectives (separate or cascading from goals).
- Actions/activities (i.e., implementable steps).
- Timelines (including milestones).
- Responsibilities (both core and support).
- Area of accountability (i.e., department or corresponding executive).
- Resources/inputs (budget, people, other).
- Effectiveness (which could include outputs, impacts, evaluative data/measures).

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7   See the *Guide to Community Identity and Collaboration* for more information.
8   See brochure on *Gathering and Managing Sensitive Information* for guidance.
9   See the *Guide to Monitoring EDI Performance* for more information.

The action items section of an EDI strategy are specific statements about how the objectives and goals will be accomplished.[10] As part of a corporate EDI strategy, action items are fleshed out in detail, including specific steps, who is responsible, milestones and timelines. Further, appropriate funds and staffing assignments are dedicated to the initial rollout and the ongoing management of the action items. Responsibility for the process of regular review, identification of improvements needed, and readjustments is also an important assignment.

Accountabilities that cascade throughout the organization, including leadership, along with training and resources to support awareness, engagement and accountability are effective when developing a strategy. Establishing clear roles, responsibilities and accountabilities for EDI can be done with regard to temporary or one-time actions or can be made more permanent by incorporating them into job descriptions, performance reviews, i.e. leadership and staff competency profiles. If resources permit, companies can establish an EDI council or committee with ongoing accountability for supporting and/or implementing the corporate EDI strategy. Integrating responsibility and accountability for EDI into roles shows that it is a systemic element of operations and an ongoing corporate value.

LEVEL A · **CRITERIA 3**

COMMUNICATIONS

Communications planning is an essential element of a corporate EDI strategy for sharing information about the strategy and any planned changes that may arise due to the strategy. Identify communication goals for target populations, the types of information to be shared, messaging for each population and relevant outreach platforms. Sharing the strategy itself with workers and, where relevant, with external partners, communities of interest and potential investors helps to raise awareness of the corporate commitment to EDI and its EDI objectives. Information about the corporate EDI strategy can be communicated in a variety of accessible, culturally appropriate formats (e.g., through an intranet site, email blasts, town hall meetings, staff gatherings, leaders' communications, newsletters, etc.) for wide coverage. Messaging about the importance of EDI and its impacts on individuals, the organization and its communities of interest will help improve understanding of EDI issues and corporate responses to them.[11]

Some examples of communications objectives and actions include:

Ensure all workers are aware of and have access to the corporate EDI strategy by sharing it through multiple formats and access points.

Build internal understanding of the corporate EDI strategy by creating dedicated time for discussion of it on meeting agendas (e.g., corporate town hall meetings).

Raise awareness of the corporate EDI strategy with communities of interest and employee groups by attaching it to agreements or core communications/materials (e.g., with corporate vendors and other third parties).

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10   See the *Guide to Putting EDI into Action* for more information.
11   See the *Case for Advancing Equity, Valuing Diversity and Practising Inclusion in Mining* for more information

LEVEL A / **CRITERIA 4**

BOARD AWARENESS AND UPDATES

Board involvement in the corporate EDI strategy signals leadership commitment to the values of EDI. Sharing the corporate EDI strategy with the board and keeping the board informed of progress toward implementation creates buy-in and support for ongoing investment. Communicating news about the strategy and related plans can be accomplished through regular correspondence with the board or scheduled inclusion in board meeting information packages. An example of a related TSM-aligned objective would be to facilitate board awareness by sharing the corporate EDI strategy and ongoing updates on its implementation at quarterly board meetings.

LEVEL A / **CRITERIA 5**

CORPORATE LEADERSHIP AWARENESS AND UPDATES

Monitoring and reporting on progress toward the corporate EDI objectives supports implementation and enables issues to be identified and resolved in a timely fashion. Putting a process in place to define/scope and regularly report to corporate leadership on the number and types of EDI issues is helpful when it comes to evaluating the effectiveness of the corporate EDI strategy. The process will name the role with responsibility for reporting to leadership and the inputs needed for each update. The report itself may take the form of a dashboard or chart of indicators that is updated and shared on a quarterly basis or other schedule. Reporting information should only be shared provided that confidentiality with respect to incidents and individuals – as well as anonymity, can be maintained. The ongoing collection of data also allows for benchmarking and observation of trends. Similarly, reporting to corporate leadership on the company's responses to EDI issues, resolutions and remediation of issues will reveal any gaps in policies and procedures. This type of information allows corporate leaders to act and make changes to improve the effectiveness of the processes supporting the EDI strategy and related action plans.[12] A potential objective here may be to facilitate leadership awareness of EDI issues through trend reports. Leadership awareness supports decision-making and could be part of realizing an EDI-related goal to decrease the number and severity of EDI-related issues or incidents occurring in the workplace.

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12   See the *Guide to Monitoring EDI Performance* for more information.

TSM EDI Protocol, Indicator 1:
LEADERSHIP AND STRATEGY (Corporate Criteria)

LEVEL AA CRITERIA

LEVEL AA	CRITERIA 1

STRATEGY IMPLEMENTATION

As a minimum level of engagement, a corporate EDI strategy that meets all of the Level A criteria will be developed and implemented. This includes:

- Aligning with the corporate commitment to EDI.
- Setting objectives as well as action plans to realize them.
- Addressing skills and knowledge gaps through training and awareness programs.
- Defining roles, responsibilities and accountabilities and allocating appropriate resources.
- Communicating the strategy to workers and external communities of interest.
- Creating and implementing processes to gather and monitor information on results and to keep the board and leadership informed of progress.

STRATEGY REVIEW

The corporate EDI strategy's goals and objectives provide areas of focus for periodic strategy reviews and updates. If not already defined within the corporate EDI strategy, a process and schedule for review can be established by the corporate lead for the EDI strategy (e.g., Human Resources, Occupational Health and Safety, Innovation, ESG, etc.).

Ongoing engagement of individuals and communities of interest, whether internal or external, in reviewing and updating the strategy helps to maintain its relevance and usefulness. Consult with a cross-section of individuals who bring diverse perspectives and experiences, including employee/union representatives and workers and communities of interest.[13] The reviews are used to address any needed implementation changes as needed. The stakeholders involved in reviewing and updating the strategy may take different forms:

a)   The review group may be the same as the team making the updates to the strategy.

b)   The review group may be different from the team making the updates to the strategy.

c)   The review group may be larger and more comprehensive as well as include the team updating the strategy.

A combination of approaches may be applied according to the life span of a strategy. For example, an annual or interim review may adopt approach a) and a review of the strategy at the end of its trajectory may involve approach c). An approach would be adopted with some consideration of the stakeholders and process initially involved in developing the strategy.

The process for review will address the key elements of:

•   Identifying the group that will make any updates to the corporate EDI strategy.
•   Defining a review schedule (e.g., twice yearly).
•   Collecting and analyzing data relevant to the EDI objectives.
•   Identifying the group that will review the data and analysis.
•   Consulting (i.e., surveys, focus groups, written feedback, etc.) with the review group to gather their input.
•   Consideration by the update group of the input and feedback on the effectiveness of the strategy.
•   Deciding on the updates needed.
•   Making updates to the corporate EDI strategy.

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13   See the *Guide to Community Identity and Collaboration* for more information.

LEVEL AA / **CRITERIA 3**

WORKER UPDATES

Sharing updates on the implementation of the corporate EDI strategy with workers helps to keep them informed of progress toward meeting EDI objectives and of leadership's ongoing commitment to EDI. Communicating with workers about the number and types of EDI issues being reported and the company's response mechanisms raises awareness of the reporting policies and processes in place and their effectiveness.[14] Worker awareness supports behavioural changes and could be part of realizing an EDI-related goal to decrease the number and severity of EDI-related issues or incidents occurring in the workplace. A short-term objective could be increasing worker awareness of the EDI values,[15] with an accompanying long-term objective of decreasing the number of EDI-related issues occurring.

LEVEL AA / **CRITERIA 4**

OBJECTIVES FOR CORPORATE LEADERSHIP MANAGEMENT

Building on the general corporate EDI objectives and establishing objectives for equitable, diverse and inclusive recruitment, retention, and representation among corporate leadership demonstrates organizational commitment to EDI values. Public reporting on the progress of these efforts creates transparency around related company processes and their effectiveness.

Working in consultation with the board, the corporate lead for the EDI strategy (e.g., a committee, Human Resources, Occupational Health and Safety, Innovation, ESG, etc.) may oversee the development of the objectives, which will involve engaging a cross-section of individuals who bring diverse perspectives and experiences, including labour organizations and workers and communities of interest[16]. Goal setting will address targets for leadership role attraction and recruitment, retention and representation. Following a review of the diversity of current leadership, related objectives could include:

Long-term objectives

Increase the recruitment of underrepresented groups for leadership roles by 10% within five years.
Measures: number of applications and hires; annually (quantitative data)

Increase the retention and job satisfaction of underrepresented groups in leadership roles by 10% with 5+ years service within five years.
Measures: number of leaders retained; annually (quantitative data) and job satisfaction survey establishing baseline and evaluating change annually (satisfaction survey gathering qualitative and quantitative data)

Short-term objective

Establish new relationships with organizations that serve underrepresented groups to increase job applications from candidates by 20% within two years.
Measures: number of new organizational relationships and the quality of applicants referred (i.e., do they meet the job criteria); every six months (quantitative and qualitative data)

Measures: number of applications and hires; every six months (quantitative data)

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14   See the *Guide to Monitoring EDI Performance* for more information.
15   See the postcard on *Fostering an EDI Workplace Culture.*
16   See the *Guide to Community Identity and Collaboration* for more information.

TSM EDI Protocol, Indicator 1
LEADERSHIP AND STRATEGY (Corporate Criteria)

LEVEL AAA CRITERIA

LEVEL AAA / **CRITERIA 1**

INDEPENDENT REVIEW

Conducting an independent review of the corporate EDI strategy will provide an unbiased, objective analysis of its effectiveness. The review will address the purpose of the strategy, which is to cultivate an equitable, diverse and inclusive workplace. It is a means of influencing workplace culture to achieve a positive, sustainable state. The analysis of the strategy's outcomes and impacts will inform future updates to the strategy and associated action plans. An independent external review, conducted at least every three years, covers:

LEVEL AAA / **CRITERIA 1A**

WORKPLACE CULTURE

The scope of the review of workplace culture will align with the corporate EDI strategy, its objectives, and priorities as identified by management and workers. While there are many models of corporate culture, the common indicators focus on shared values and behaviours. These may be observed in many ways, such as worker sense of empowerment (e.g., comfort level with reporting an EDI issue), job satisfaction (a predictor of retention) or trends in EDI issues being reported. An example of objectives related to workplace culture include:

Long-term objective

Improve workers' sense of empowerment by 10% within five years.
Measures: annual survey, exit interviews, focus groups; annually + (quantitative and qualitative data)

Short-term objective

Increase organizational score for worker job satisfaction by 20% within two years.
Measures: results of questions on job satisfaction in annual and pulse surveys; annually + (quantitative data)

Potential data collection methods are varied and may include anonymous surveys, focus groups, exit interviews or semi-structured conversations with individual workers and managers. The results of the review will be used by management and corporate leadership to inform future efforts and, potentially, to update the corporate EDI strategy.

LEVEL AAA / **CRITERIA 1B**

LEADERSHIP EDI COMPETENCY

The competency of corporate leadership related to EDI and the workplace is a key part of a workplace culture review, given the importance of leadership commitment to EDI values and the success of the corporate EDI strategy. Establishing relevant EDI competencies, supporting their practice through training and professional development and evaluating their effectiveness can be carried out in any number of ways, including through performance reviews. The results of the review can be used to identify knowledge or competency gaps and inform leadership competency development plans.

LEVEL AAA / CRITERIA 2

IMPLEMENTATION OF INDICATORS 2 AND 3

The corporate EDI strategy will include consideration and implementation of the requirements of Indicators 2 and 3 of the TSM Protocol at all offices and sites. The inclusion of these indicators demonstrates a comprehensive approach to EDI that covers action planning at the individual facility level as well as active monitoring and reporting on corporate EDI performance. Sharing information and communicating expectations with offices and sites will assist with preparations for meeting the requirements of Indicators 2 and 3 across the organization. Support for facilities as they develop plans to act on the corporate EDI strategy can address how they:

- Establish facility-level EDI objectives.
- Engage with communities of interest.
- Validate job candidate identity and status.
- Integrate EDI into strategic processes, including performance management.
- Monitor and report data.

LEVEL AAA / CRITERIA 3

BOARD AND MANAGEMENT

An advanced level of engagement with EDI calls for the establishment of related comprehensive board and management structures, accountabilities, responsibilities and reporting processes. These structures enable the corporate EDI strategy to be implemented, monitored and measured for assessment of effectiveness. Potential approaches include:

- Management shares EDI goals, objectives and data on outcomes and impacts with the board for awareness and discussion.
- The board establishes its own committee responsible for monitoring corporate EDI trends and making recommendations.
- Management and the board define a public reporting strategy (i.e., what will be reported, how often and by whom).
- Management and the board participate in periodic independent external reviews of their EDI competency.

LEVEL AAA / CRITERIA 4	**PUBLIC REPORTING OF ISSUES**

PUBLIC REPORTING OF ISSUES

Public reporting on the number and types of EDI issues occurring within a company demonstrates transparency and a willingness to share information on progress. Decisions on what information to share publicly will influence the type of data collected by the organization.[17] While confidentiality and anonymity regarding the reported issues are paramount, the nature of any issues arising provides valuable data on the effectiveness of the corporate EDI strategy and the company's ongoing commitment to realizing its EDI values.

The corporate lead(s) for the EDI strategy (e.g., a committee, Human Resources, Occupational Health and Safety, Innovation, ESG, etc.) can support the development of reporting objectives and the gathering of related information. These may include establishing targets for issue response and resolution timing; a schedule for facility issue data collection and sharing; or raising awareness of the issue reporting mechanisms in place.

The channels for public reporting on EDI issues vary widely and may include information on the company's website, in the company's annual report, traditional or social media, or through blogs or editorials.

ONGOING MANAGEMENT OF CORPORATE LEADERSHIP

Objectives for equitable, diverse and inclusive recruitment, retention, and representation among corporate leadership were established to meet the criteria of Level AA. Plans for continual improvement demonstrate ongoing organizational commitment to EDI values.[18]

Working in consultation with the board, management determines the objectives and corresponding data or information that will be shared publicly. The next steps to making improvements are also identified and shared publicly. Similar to public reporting on EDI issues, channels for sharing vary widely and may include information on the company's website, in the company's annual report, traditional or social media, or through blogs or editorials.

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17 See the *Guide to Monitoring EDI Performance* for more information.
18 See brochure on *Gathering and Managing Sensitive Information* for guidance.

Review Outcomes and Monitor Performance

It is important for organizations to establish procedures and processes for tracking the results of their EDI strategy in order to maintain engagement, monitor progress, make timely adjustments to plans, learn from challenges and report on successes. Data on the outcomes and impacts of the EDI strategy are shared with management and the board to facilitate understanding and decision-making. Such data is also critically important to internal and independent reviews of the corporate EDI strategy and related objectives, plans, processes and procedures.

Identifying the scope of data to be collected, data collection methods and reporting mechanisms are the initial steps. The scope and data collection methods to be used are informed by input from a cross-section of individuals who bring diverse perspectives and experiences, including labour, workers and communities of interest. While facilities are recommended to report demographic information publicly, it is important to observe confidentiality and privacy laws. The *Guide for Mining Companies on Monitoring and Reporting EDI Performance* provides detailed advice on tracking progress towards objectives and evaluation of effectiveness.

Conclusion

This Guide to Developing a Corporate EDI Strategy provides a roadmap for engaging an organization and the people involved with it in developing an EDI strategy that meets the requirements of the TSM EDI protocol. A corporate EDI strategy, including goals, objectives, actions, accountabilities, resources, timelines and monitoring/evaluation supports the implementation of a corporate EDI commitment statement or policy and other elements as the organization moves toward becoming more equitable, diverse and inclusive.[19]

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19   See the Tipsheet on Developing a Corporate EDI Commitment Statement for more information.

Steps to Develop and Sustain a Corporate EDI Strategy[20]

An ongoing process of action, monitoring review and updating:

Engagement
- Supports the development of a robust strategy, buy-in, implementation and review.
- Enhances credibility and capacity to effectively implement.

Review and Monitor
- Establish data monitoring processes
- Identify indicators of progress + impact, Internal and external measures (qualitative, quantitative)
- Define reporting formats/ timelines

Reporting
- Identify types of EDI issues to report
- Establish reporting schedule, scope, guidelines for confidentiality, anonymity.
- Analyse for policy implementation gaps.
- Support awareness among corporate leaders.

Communications
- Identify internal and external audiences and related goals for sharing information re: EDI Strategy development, implementation, review/ monitoring.
- Plan for clear, accessible, culturally-appropriated communications.
- Use different communication methods and formats to reach specific audiences effectively.
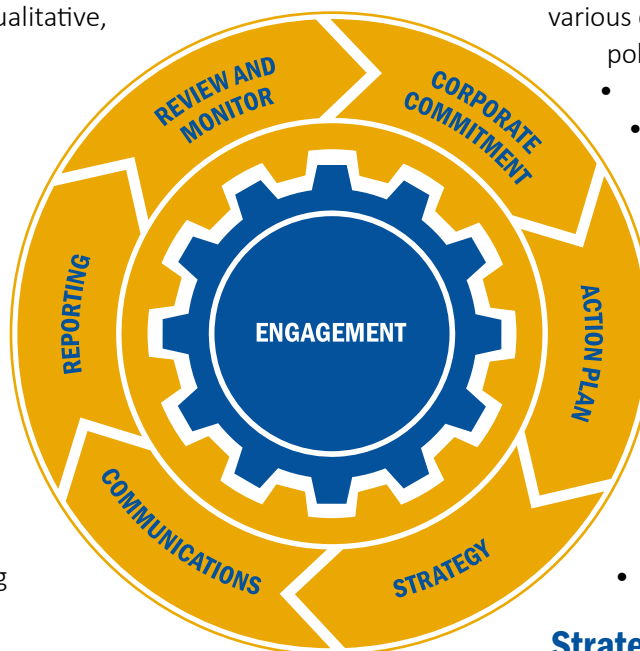
Corporate Commitment
- Important for internal and external audiences.
- May reside in one statement or be part of various corporate tools e.g. values, policies, code of conduct.
  - Keep concise and high level.
  - Use plain language
  - Map to action plan, corporate strategy

Action Plan
- Align with corporate commitment.
- Take stock of current corporate efforts.
- Compare against TSM EDI Level A criteria to identify gaps.
- Plan actions to address gaps.

Strategy
- Includes goals, objectives, actions and training, performance measures, review.
- Infuses EDI into organization by clearly associating roles, responsibilities, accountabilities and resources to EDI goals, objectives etc.

Gear diagram center: ENGAGEMENT
Surrounding segments: REVIEW AND MONITOR, CORPORATE COMMITMENT, ACTION PLAN, STRATEGY, COMMUNICATIONS, REPORTING

20   See the *Guide to Developing a Corporate EDI Strategy* for more details.