# CCLA Corporate Mental Health Benchmark Global 100+



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2024



## Contents



Engagement, awareness and action are the cornerstones of the CCLA Corporate Mental Health Benchmark. It is these three things that will drive and sustain consistent and measurable change for the benefit of employees, companies and investors alike. The benchmark's logo is designed to give the tool a clear identity and to enable companies and investors to signal their commitment to supporting healthy workplaces. It is available for use by benchmark companies and by signatories to the global investor statement on workplace mental health. Please email amy.browne@ccla.co.uk.

Illustrations by Millie Nice www.millienice.com

Acknowledgements	3
Executive summary	4
Chapter 1 Company ranking	9
Chapter 2 Performance analysis	14
Chapter 3 Question-by-question breakdown and case studies	25
Chapter 4 About the benchmark	67
Chapter 5 Alignment with international frameworks and norms	71
Chapter 6 A vision for company and investor action	73
Appendix 1 2024 benchmark assessment criteria	75
Appendix 2 List of global companies covered by the 2024 benchmark	78
Appendix 3 Recommended reading	81
Glossary	82
Endnotes	84

#### A note on currencies quoted in this report

All values quoted from published research are stated in their original currency. For relevance to a global audience, however, the values are also shown in US dollars.

The exchange rates used are mid-market rates and are accurate at the time of writing:

	GBP (£)	USD (\$)
GBP (£)	1.0	1.3
USD (\$)	0.8	1.0

## Acknowledgements

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We would like to thank the following for their support of this project and their contribution to the design and development of the CCLA Corporate Mental Health Benchmark.

#### First, the Expert Advisory Panel:

- Elizabeth Sheldon, CCLA (co-chair)
- Lord Dennis Stevenson CBE (co-chair)
- Dr Richard Caddis, Rolls-Royce
- Paul Farmer CBE, Age UK
- Remi Fernandez, Principles for Responsible Investment
- Dr Sarah Hughes, Mind
- Dr Shekhar Saxena, Harvard T.H. Chan School of Public Health
- Dr Junko Umihara, Showa Women's University

Second, the **53 benchmarked companies** that took the time to engage with the assessment process.

Third, the **55 global investors** that support CCLA's engagement efforts on this topic.

Finally, at CCLA, Dr James Corah and Peter Hugh Smith, and at Chronos Sustainability, Dr Rory Sullivan, Dr Nathan Williams, Chup Priovashini and the team of analysts who undertook the company assessments.

here has been a significant rise in the popularity and profile of environmental, social and governance (ESG) investing in recent years. Most ESG fund managers select and invest in companies with good ESG ratings. The result is a 'clean' portfolio that feels comfortable.

While it is important to avoid investing in the companies that cause the most harm to the environment and our communities, or those that could be reputationally damaging to our clients, we believe that investing only in ESG leaders is unlikely to have a positive impact on the planet or society. In buying a company that is already a leader in sustainability, investors are simply providing liquidity to another investor that wishes to sell. How, then, should we judge efforts to invest sustainably? Surely this should be by how they affect the real world.

Failure to take action on the climate, erosion of social cohesion and public health crises all represent system-wide dangers, not only to portfolios but also to the environment and the functioning of society. These issues cannot be solved by a single investor in dialogue with a single investee company. They require sustained collaboration and a universal approach to stewardship.

CCLA does not own shares in every company in this benchmark. However, through our systemic, 'greater good' approach to company engagement, we aim to do our bit in making the world a better place.

### Executive summary

he scale of the global mental health challenge is daunting: evidence suggests that 15% of working-age adults have a mental disorder and that \$1 trillion is lost to the world economy each year because of the impact - mostly on lost productivity - of depression and anxiety.<sup>1</sup> The good news is that there is a strong financial case to be made for companies looking to promote and protect the mental health of their workers. It has been estimated that investing in mental health interventions at work yields an average return to employers of £4.7 (\$6.1) for every £1 (\$1.3) spent.<sup>2</sup> Furthermore, for employees, the workplace underpinned by a culture supportive of good mental health - can be an important source of connection and purpose.<sup>3</sup> All parties stand to gain.

The CCLA Corporate Mental Health Benchmark assesses the extent to which companies are managing both the opportunities and risks associated with workplace mental health. In 2024, we assessed 119 global companies based on their public disclosures to understand the degree to which they are taking a holistic and structured approach to supporting mental wellbeing at work. This report details the findings from the benchmarking process.

Through our annual corporate benchmarking programme and accompanying investor engagement initiative, we aim to increase awareness, to help share good practice and ultimately to drive positive change in employee mental health.

Over 21 million employees – the combined workforce of the 119 global companies covered by the 2024 benchmark

#### CCLA

#### Global investor statement on workplace mental health

As long-term institutional investors, we believe that protecting and promoting good workplace mental health is a business imperative, relevant not only to a company's

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ors, we believe that
workplace mental health
t not only to a company's
it also to its bottom line.
responsible investors, and consistent th our fiduciary duty to our beneficiaries, a will seak to use the findings of the ZLA Corporate Mental Health Benchmarks encourage companies to take the lowing actions:
Acknowledge workplace mental health as an important consideration for the business and for its employees.
Signal board and senior management commitment to promoting mental health in the workplace, recognise the link between mental health and 'good work' principles, and encourage a culture of
openness on mental health.
Publish a commitment to workplace mental health in a policy statement (or equivalent) together with a description of the scope of this commitment and of the governance and management processes in place to ensure the policy is effectively implemented and monitored.
Set objectives and targets to improve workplace mental health.
Report annually on progress against

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# The global investor coalition on workplace mental health

Already, the CCLA Corporate Mental Health Benchmark is starting to serve as an important engagement tool and an accountability mechanism for a growing global coalition of institutional investors and asset owners. The global investor statement on workplace mental health<sup>4</sup> was launched in July 2022 with 29 founding signatories representing \$7 trillion in assets under management. As this report goes to press, the investor statement has 55 investor signatories with a combined \$9.8 trillion in assets under management.

Given the level of engagement we are already seeing – both from companies covered by the benchmark and from investors – we are confident that the benchmark will continue to provide incentives for the world's largest businesses to improve.

## Performance overview

# 12 companies moved up a performance tier

Promisingly, 12 companies improved sufficiently over the past year to move up a performance tier, to the implied benefit of almost 1.5 million workers.

# 87 companies remain in the same tier

A total of 87 companies remain in the same performance tier as last year. While some improved their score, any uplift was insufficient to result in a change of tier.

For the first time, companies in tier 4 outnumber tier 5

For the first time, the percentage of companies in performance tier 4 outnumbers the percentage in tier 5 (worst). While this trend should be celebrated, it is disappointing that 42 companies are in the lowest performance tier in 2024. Just five companies in the top two tiers

Just five companies are ranked in the top two performance tiers, suggesting that only around 600,000 of the 21 million employees in the benchmarked companies work for businesses with a mature strategic approach to workplace mental health.

# Company and investor engagement

# 53 companies

(of 119) engaged with the benchmarking process.

- 53 engaged directly with CCLA over the past year.
- 26 of these also reviewed their preliminary assessment, with many providing substantive comments.

# 52 investors

with \$8.7 trillion in assets under management supported engagement efforts by co-signing letters issued to companies in October 2023.

• Nineteen of these investors engaged directly with companies throughout the year on mental health, often independently of CCLA.

# \$9.8 trillion

The global investor coalition on workplace mental health has grown to 55 investors with a combined \$9.8 trillion in assets under management (August 2024).

• Since its launch in July 2022 with just 29 founding signatories, the coalition's growth in investor support demonstrates an increasing awareness by investors of mental health as a material business concern.



## Key insights into the mental health of Global 100+ companies

#### Almost all companies provide mental health support services to employees.

Investment in the provision of mental health support to employees is near universal – 98% of businesses report on at least one service offering. Examples include employee assistance programmes, access to clinical counselling and therapy sessions, and subscriptions to digital mental health apps.

#### Most companies are raising awareness of mental health among their workforces.

Just over three quarters (78%) disclose details of awareness-raising initiatives, such as internal communications campaigns and whole-workforce training.

#### Less than a quarter of companies disclose that mental health training is provided to line managers.

Just 24% of companies disclose the provision of mental health training to line managers – only marginally higher than in 2023 (22%). Mental health training is a key intervention recommended in the 2022 WHO guidelines on mental health at work,<sup>5</sup> and managers are ideally placed to direct individuals to relevant support resources that might prevent progression to long-term sickness.

#### Just 13% of companies publish a CEO statement on workplace mental health.

As the highest-ranking officers charged with the management of an organisation, CEOs are uniquely placed to champion mental health and set the tone from the top.

#### Companies are broadly failing to link workplace culture – or good work – and mental health.

Most businesses outline commitments on at least some elements of good work – such as diversity, equity and inclusion (DEI), fair pay and financial wellbeing, flexible working and career progression. However, there is widespread failure to acknowledge the impact of the resultant working culture on mental wellbeing. For example, although all of the assessed companies publish a DEI commitment, only 15% make the connection with mental health in the workplace.



# Our recommendations for employers

We encourage all listed companies, regardless of size, location, or industry, to review the findings in this report. Specifically, we recommend the following:



### Chapter 1 Company ranking

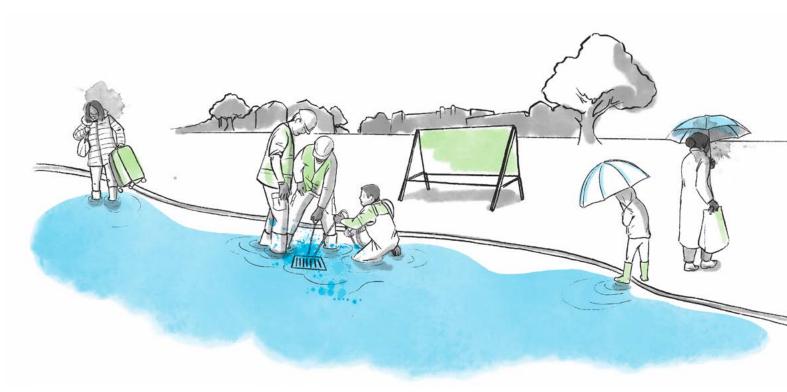
The companies in this global benchmark were selected based on a set of specific considerations, including market capitalisation, workforce size and previous inclusion in the benchmark.

We assessed 119 companies this year compared to 110 companies in 2023. A full list of the companies is available in Appendix 2. We removed Unilever from the global benchmark – although it continued to feature in the UK version – and added 10 new companies. The new companies are indicated on page 11. The 119 companies in this benchmark represent 10 industry sectors, which are classified using the Global Industry Classification Standard (GICS) as:

- communication services
- consumer discretionary
- consumer staples
- energy
- financials
- health care
- industrials
- information technology
- materials
- utilities.

The benchmark spans 19 countries of domicile: Australia, Belgium, Canada, China, Denmark, France, Germany, Hong Kong, India, Ireland, Japan, Netherlands, Saudi Arabia, South Korea, Spain, Switzerland, Taiwan, United Kingdom and United States.

We conducted independent company assessments and quality assurance between 3 June and 3 July 2024. We then invited all companies to review their preliminary assessment during July before we finalised the scores in August.

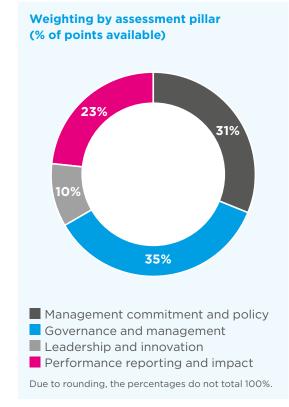


### Assessment methodology

The benchmark evaluates companies against 27 assessment criteria based on the information publicly available during the assessment period. The criteria cover four thematic pillars:

- management commitment and policy
- governance and management
- leadership and innovation
- performance reporting and impact.

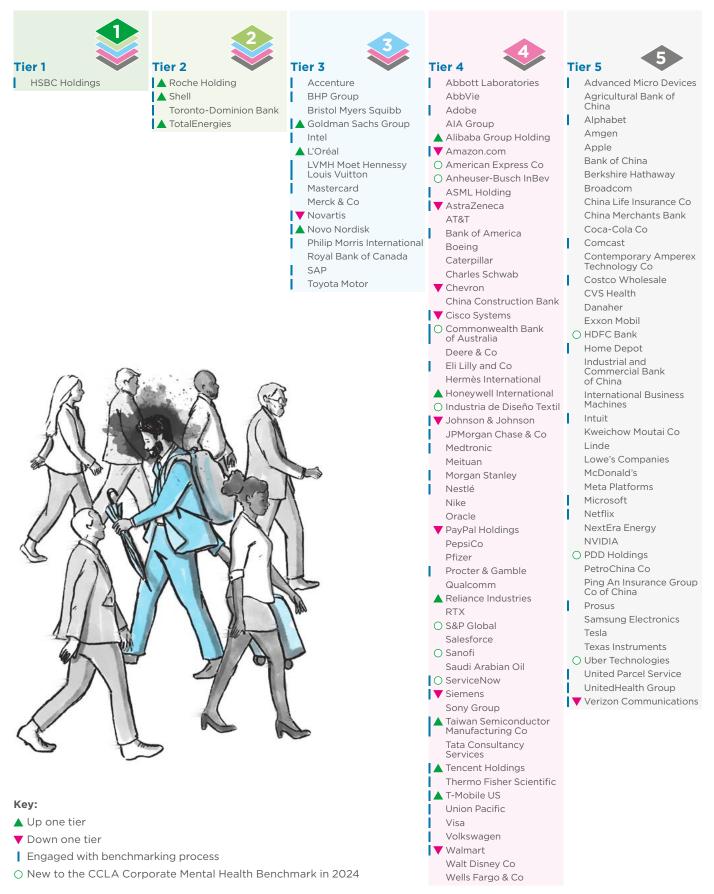
Each pillar is weighted as illustrated (see Appendix 1 for the full benchmark assessment criteria). The tier rankings are based on each company's overall score as a percentage of the maximum score available. Companies are ranked across five performance tiers (set out below). This allows us to evaluate the performance of businesses in the benchmark based on the maturity of their approach to workplace mental health. The framework recognises that every company is at a different stage in the journey towards integrating mental health into its business strategy and reporting.



Tier	Overall performance score range	Tier description
	81%-100%	Companies are leading the way on workplace mental health management and disclosure
2	61%-80%	Companies are well on the way to demonstrating a strategic approach to workplace mental health management and disclosure
3	41%-60%	Companies are on the way to developing robust systems for workplace mental health management and disclosure
4	21%-40%	Companies are on the journey and have begun to formalise their approach to workplace mental health management and disclosure
5	0%-20%	Companies are at the start of the journey to adopting a formal approach to workplace mental health management and disclosure

### Tier ranking

Companies are listed in alphabetical order within each tier.

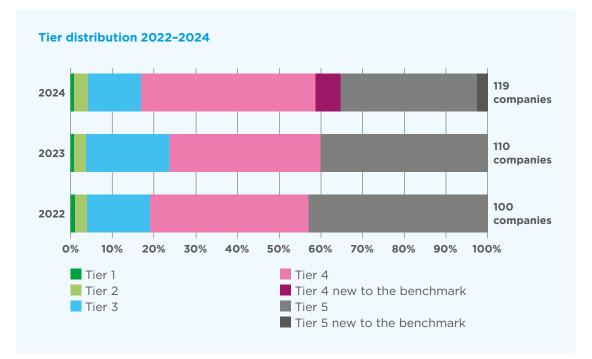


Our discussions with some of the assessed companies suggest that the level of corporate reporting on workplace mental health may not fully reflect the activity taking place 'on the ground'. A lack of reporting renders it difficult for investors to assess companies accurately on the effectiveness of their management controls or their relative performance on mental health. Through repeating the assessment process annually, we aim to encourage greater disclosure on – and enrich understanding of – the business risks and opportunities presented by workplace mental health.

We hope the findings of our annual assessments will demonstrate to companies how they can improve their approach and sustain a management focus on workplace mental health.

### Tier distribution

This chart shows the change in the percentage of companies in each performance tier over the past three years.



### Average scores

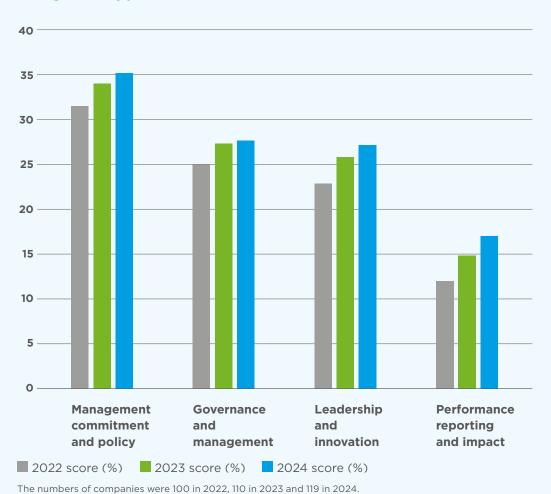
#### **Overall average score**

The overall average score of a company in the Global 100+ benchmark is 28% (28% in 2023), which demonstrates continuity in corporate performance – albeit with much room for improvement. For the 99 companies that have appeared in the benchmark over the past three years (i.e. excluding new entrants to, and departures from, the benchmark), the overall average score has increased from 24% in 2022 to 29% in 2024. Ten companies were added to the Global 100+ benchmark this year. The overall average score for these companies is 22%.

#### Average score by assessment pillar

The chart below shows the year-on-year changes in average score across the four assessment pillars. It indicates that there has been some progress each year for all pillars – even if marginal for governance and management between 2023 and 2024.

As we would expect at this relatively early stage of the benchmark, the companies are continuing to achieve a higher average score in management commitment and policy compared to the other pillars. This indicates that the companies are still focusing their efforts on formalising their management commitments on mental health.

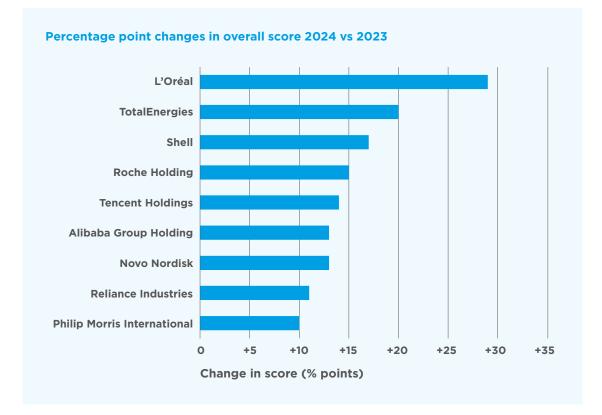




### Chapter 2 Performance analysis

### Top improvers 2024 vs 2023 (by overall score)

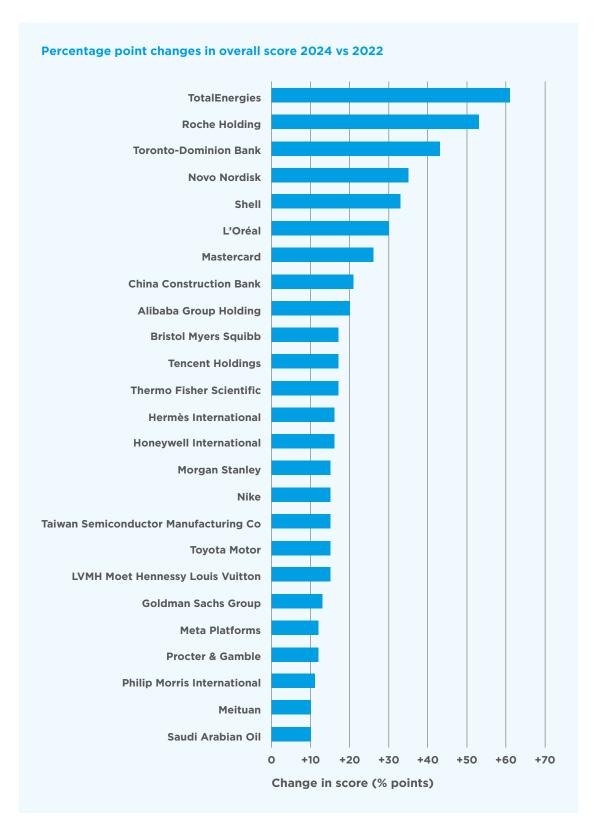
The following companies improved against the assessment criteria by 10 or more percentage points between 2023 and 2024. The chart shows the most improved companies first.





### Top improvers 2024 vs 2022 (by overall score)

The following companies improved against the assessment criteria by 10 or more percentage points between 2022 and 2024. The chart shows the most improved companies first.



### Top performers by assessment pillar

Here we list the companies that achieved the highest scores in 2024 by assessment pillar.

#### Management commitment and policy

Position	Company
1	Toronto-Dominion Bank
2	SAP
3	Roche Holding
4	Novartis
5	Shell
= 6	HSBC Holdings
= 6	Novo Nordisk
= 6	BHP Group
= 6	Philip Morris International
10	TotalEnergies

#### Leadership and innovation

Position	Company
= 1	Amazon.com
= 1	HSBC Holdings
3	BHP Group
= 4	Morgan Stanley
= 4	Shell
= 6	Alibaba Group Holding
= 6	Bank of America
= 6	L'Oréal
= 6	Accenture
= 10	AT&T
= 10	Johnson & Johnson
= 10	Meta Platforms
= 10	Nike
= 10	Wells Fargo & Co

#### Governance and management

Position	Company
1	TotalEnergies
2	Toronto-Dominion Bank
3	HSBC Holdings
4	Philip Morris International
5	Novartis
= 6	Toyota Motor
= 6	Roche Holding
= 6	Shell
9	L'Oréal
= 10	SAP
= 10	LVMH Moet Hennessy Louis Vuitton

#### Performance reporting and impact

Position	Company
1	HSBC Holdings
= 2	TotalEnergies
= 2	Roche Holding
= 2	LVMH Moet Hennessy Louis Vuitton
= 5	China Construction Bank
= 5	Merck & Co
= 7	Goldman Sachs Group
= 7	Intel
= 7	ĽOréal
= 7	Philip Morris International
= 7	Taiwan Semiconductor Manufacturing Co
= 7	Toyota Motor
= 7	SAP

### Company performance by assessment pillar

The following chart indicates the performance of each company in the benchmark across the four assessment pillars. The companies are listed in alphabetical order.

Company	Tier	Management commitment and policy	Governance and management	Leadership and innovation	Performance reporting and impact
Abbott Laboratories	4				
AbbVie	4				
Accenture	3				
Adobe	4				
Advanced Micro Devices	5				
Agricultural Bank of China	5				
AIA Group	4				
Alibaba Group Holding	4	•			
Alphabet	5				•
Amazon.com	4	•			
American Express Co*	4		•		•
Amgen	5				
Anheuser-Busch InBev*	4	•	•		
Apple	5	•			
ASML Holding	4	•	•	•	
AstraZeneca	4	•	•	•	•
АТ&Т	4	•	•		•
Bank of America	4	•	•	•	•
Bank of China	5	•	•	•	•
Berkshire Hathaway	5		•	•	
BHP Group	3	•	•	•	•
Boeing	4		•	•	•
Bristol Myers Squibb	3	•	•	_	•
Broadcom	5		•	•	
Caterpillar	4		•	•	•
Charles Schwab	4		•	•	
Chevron	4		•	•	
China Construction Bank	4		•	•	
China Life Insurance Co	5		•	•	•
China Merchants Bank	5	•	•	•	•
Cisco Systems	4		•	•	•
Coca-Cola Co	5	•	•	•	•
Comcast	5	•	•	•	•
Commonwealth Bank of Australia*	4			•	•
Contemporary Amperex Technology Co	5		•	•	•
Costco Wholesale	5		•	•	•
CVS Health	5		•		•
Danaher	5		•	•	•
Deere & Co	4		•	•	•

**Key:** First quintile Second quintile Third quintile Fourth quintile Fifth quintile \*These companies are new to the CCLA Corporate Mental Health Benchmark in 2024.

Company	Tier	Management commitment and policy	Governance and	Leadership and	Performance reporting and impact
Company Eli Lilly and Co	4		management	innovation	
Exxon Mobil	5				
Goldman Sachs Group	3				
HDFC Bank*	5				
Hermès International	4				
	5				
Home Depot Honeywell International	5				
	1				
HSBC Holdings Industria de Diseño Textil*	4				
	4 5				
Industrial and Commercial Bank of China					
Intel					
International Business Machines	5				
Intuit	5				
Johnson & Johnson	4				
JPMorgan Chase & Co	4		•	•	•
Kweichow Moutai Co	5		•		•
L'Oréal	3		•		•
Linde	5	•	•		•
Lowe's Companies	5	•		•	
LVMH Moet Hennessy Louis Vuitton	3			•	
Mastercard	3		•	•	
McDonald's	5	•	•	•	•
Medtronic	4	•	•	•	•
Meituan	4	•	•	•	•
Merck & Co	3		•	•	•
Meta Platforms	5		•	•	•
Microsoft	5			•	
Morgan Stanley	4				
Nestlé	4				
Netflix	5		•	•	•
NextEra Energy	5	•	•	•	•
Nike	4		•	•	•
Novartis	3	•		•	•
Novo Nordisk	3		•	•	•
NVIDIA	5		•	•	•
Oracle	4		•	•	•
PayPal Holdings	4	•	•	•	•
PDD Holdings*	5	•	•	•	•
PepsiCo	4				-
PetroChina Co	5				-
Pfizer	4				

**Key:** First quintile Second quintile Third quintile Fourth quintile Fifth quintile \*These companies are new to the CCLA Corporate Mental Health Benchmark in 2024.

Company	Tier	Management commitment and policy	Governance and management	Leadership and innovation	Performance reporting and impact
Philip Morris International	3				
Ping An Insurance Group Co of China	5				
Procter & Gamble	4				
Procter & Gamble Prosus	5				
Qualcomm Reliance Industries	4				
	2				
Roche Holding	2				
Royal Bank of Canada	3				
	4				
S&P Global*	4				
Salesforce	4				•
Samsung Electronics	5	•		•	
Sanofi*	4				
SAP	3	•	•	•	
Saudi Arabian Oil	4		•		
ServiceNow*	4			•	
Shell	2	•	•		•
Siemens	4	•	•	•	
Sony Group	4	•	•		
Taiwan Semiconductor Manufacturing Co	4		•		
Tata Consultancy Services	4				
Tencent Holdings	4				
Tesla	5		•	•	
Texas Instruments	5		•		
Thermo Fisher Scientific	4	•	•	•	
I-Mobile US	4	•			
Foronto-Dominion Bank	2				
TotalEnergies	2	•		•	
Toyota Motor	3			•	
Jber Technologies*	5	•		•	
Jnion Pacific	4	•	•		•
Jnited Parcel Service	5	•	•	•	
JnitedHealth Group	5	•	•	•	
/erizon Communications	5	•			
Visa	4				
Volkswagen	4				
Walmart	4				
Walt Disney Co	4				
Wells Fargo & Co	4				

**Key:** First quintile Second quintile Third quintile Fourth quintile Fifth quintile

\*These companies are new to the CCLA Corporate Mental Health Benchmark in 2024.

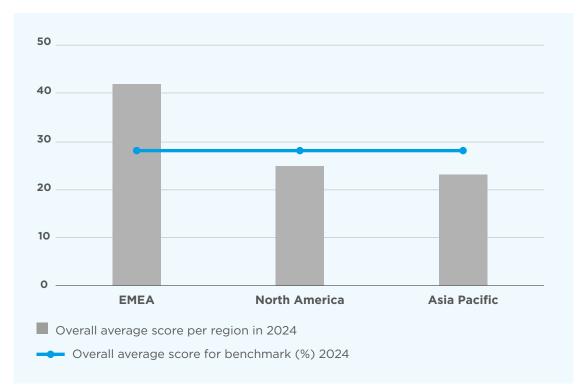
### Geographical analysis

Of the three regions represented in the Global 100+ benchmark, EMEA (Europe, the Middle East and Africa) is the top performer. As set out in the table below, the companies in this region achieved an overall average score of 42% compared with the benchmark average for all 119 companies of 28%.

Continuing the trend revealed in 2023, EMEA performed very significantly above the overall benchmark average, while North America performed below the average and Asia Pacific performed even more below the average. 61% of the companies in the benchmark are domiciled in the North American region.

Geographic region	Overall average score (%) 2024	Overall average score (%) 2023	Number of companies in 2024
EMEA	42	41	23
North America	25	26	73
Asia Pacific	23	20	23
All companies	28	28	119

Please refer to Appendix 2 for a full list of companies and countries of domicile.



### Sectoral analysis

The six largest sectors in the Global 100+ benchmark represent 84% of the companies evaluated in 2024.<sup>1</sup> Of these sectors, health care is performing the strongest. This sector achieved an overall average score of 33% compared with the overall benchmark average of 28%.

When we analyse the scores by assessment pillar, we observe that:

- Health care significantly outperforms the pillar benchmark average on management commitment and policy, and also performs above the pillar benchmark average for governance and management, and leadership and innovation.
- Consumer staples performs above the pillar benchmark average on management commitment and policy, governance and management, and performance reporting and impact.
- Financials performs above the pillar benchmark average on leadership and innovation, and performance reporting and impact.
- Information technology is the lowestperforming sector on leadership and innovation.
- Consumer discretionary and industrials perform below the pillar benchmark averages across all four pillars.

and policy (%)	and management (%)	and innovation (%)	reporting and impact (%)	average score (%)
48	33	30	17	33
39	30	27	20	30
35	28	29	20	29
33	26	23	17	26
30	26	24	16	25
22	22	25	16	21
35	28	27	17	28
	39 35 33 30 22	39       30         35       28         33       26         30       26         22       22	393027352829332623302624222225	3930272035282920332623173026241622222516

### Comparison with 2024 UK benchmark

While it is not the intention to compare the findings of the UK 100 and Global 100+ benchmarks in detail, it is interesting to observe that UK companies achieved an overall average score of 41% (40% in 2023) compared to 28% for global companies (28% in 2023).

1 Sectors with fewer than 10 companies (namely communication services, energy, materials and utilities) have been excluded from the analysis to minimise sampling errors. Refer to Appendix 2 for a full list of companies by sector.



### Performance by assessment criteria

We analysed year-on-year changes in scoring for each question to better understand where companies are making progress and, conversely, to highlight areas of limited or no progress. We will continue to carry out this analysis in future years.

Refer to Appendix 1 for the full assessment criteria.

The following assessment criteria showed a marked (i.e. over five percentage points) improvement in the proportion of companies scoring maximum points.

Question number	Question text	Companies scoring maximum points (2024) (%)	Companies scoring maximum points (2023) (%)	Points difference (%)
156	Has the company developed formal initiatives or programmes to raise awareness of mental health in the workplace that extend beyond employees and contingent workers (e.g. to customers and/or suppliers)?	24	10	+14
	For context, question 15a: Has the company developed formal initiatives or programmes to raise awareness of mental health in the workplace?			
16	Does the company provide access to mental health services and support either internally or externally?	84	78	+6
22	Does the company provide examples of employee communications on workplace mental health?	36	30	+6
Key:		and innovation e reporting and im	npact	

The following assessment criteria showed a marked (i.e. over five percentage points) deterioration in the proportion of companies scoring maximum points.

Question number	Question text	Companies scoring maximum points (2024) (%)	Companies scoring maximum points (2023) (%)	Points difference (%)
12b	Has the company assigned day-to-day operational management responsibility for workplace mental health?	21	27	-6
21b	Does the company engage customers and/or suppliers in initiatives or programmes aimed at promoting positive mental health?	9	15	-6
	For context, question 21a: Does the company participate in industry or academic initiatives or partnerships aimed at promoting positive workplace mental health?			
Key:		nip and innovation ance reporting and im	npact	

#### Top-performing assessment criteria

The following table shows the questions on which companies scored highest in 2024.

Question number	Question text	Companies scoring maximum points (%)
1	Does the company acknowledge workplace mental health as an important concern for the business?	45
5	Does the company have a clear management commitment to encouraging a culture of openness on mental health?	29
7	Does the company support the principles of good work by having a formal commitment to fair pay and financial wellbeing?	29
15a	Has the company developed formal initiatives or programmes to raise awareness of mental health in the workplace?	56
16	Does the company provide access to mental health services and support either internally or externally?	84
22	Does the company provide examples of employee communications on workplace mental health?	36
Key:	<ul> <li>Management commitment and policy</li> <li>Governance and management</li> <li>Leadership and inno</li> <li>Performance report</li> </ul>	



#### Bottom-performing assessment criteria

The following table highlights the questions on which companies performed least well in 2024. All four pillars are represented.

Question number	Question text	Companies scoring maximum points (%)
8	Does the company support the principles of good work by having a formal position on board-employee information and consultation?	1
13	Has the company set objectives or targets for the management of mental health in the workplace?	5
18b	Does the company adapt mental health programmes to local contexts? <sup>1</sup>	4
20	Does the company independently assure its mental health management system against a recognised framework or standard? <sup>2</sup>	0
21a	Does the company participate in industry or academic initiatives or partnerships aimed at promoting positive workplace mental health?	3
24	Does the company report on progress against its objectives or targets related to mental health?	3
25a	Does the company report on the proportion of line managers that are trained in workplace mental health?	4
Key:	<ul> <li>Management commitment and policy</li> <li>Governance and management</li> <li>Leadership and inno</li> <li>Performance report</li> </ul>	

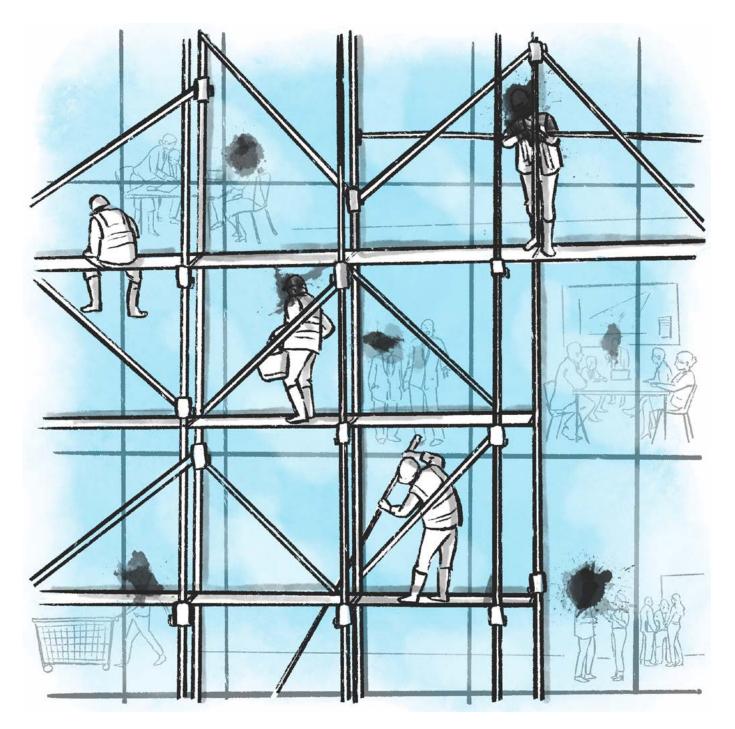
- 1 This question is new to the 2024 benchmark. See the question-by-question breakdown (Chapter 3) for additional information.
- 2 This question was revised for the 2024 benchmark. See the question-by-question breakdown (Chapter 3) for additional information.

## Chapter 3 Question-by-question breakdown and case studies

This section of the report looks in detail at the 27 criteria against which companies were assessed. It reflects on the findings from the data and provides examples of current and leading practice on workplace mental health.

Good practice is evident in company reporting across all five performance tiers, and in all regions, as illustrated in the following pages. We hope that the featured case studies will inspire companies to develop and improve their own approaches to managing and reporting on workplace mental health.

For each of the 27 criteria, the percentage of companies scoring full points, zero points or partial points is indicated in the accompanying graph.



### Management commitment and policy



# Q1. Does the company acknowledge workplace mental health as an important concern for the business?

Acknowledging mental health as a business issue is an important first step in implementing a comprehensive approach to workplace mental health. It is good practice for companies to describe the business drivers for developing an effective approach to the management of mental health in the workplace.

#### **Benchmark findings**

We are pleased to note that 95% of the assessed companies (95% in 2023) continue to acknowledge workplace mental health as an important business issue. Of all the companies, 45% (43% in 2023) describe the business risks or opportunities related to mental health in the workplace. The companies that recognise the significance of mental health in organisational success typically reference business drivers including talent attraction, employee retention and workforce productivity.

Here are two examples of companies that publicly signal their commitment to workplace mental health as a business issue and describe the related drivers.

#### **Bank of America**

#### Region: North America



**G** Not only are employers uniquely positioned to influence a positive shift in the mental well-being of their employees – as full-time employees spend an average of 50% of their waking life at their place of work – but employers have also recognized that creating a supportive environment for employee mental health makes good business sense. Poor employee mental health drives negative outcomes in the workplace, from low engagement to diminished productive capacity to greater rates of absenteeism ... A strong system of support for workplace mental health can not only reduce employee turnover, saving employers time and money associated with recruiting and training new employees, but also increase workforce satisfaction and productivity, and help an employer stand out in attracting and retaining high-quality talent.

Bank of America, 'A path to better workplace mental health: reorienting approaches and priorities'  $^{\rm 6}$ 

#### Amgen

#### Region: North America

**G** People are not one-dimensional, and neither is their wellness. To help our employees bring their best selves to work and life every day, we invest in their well-being as well as their family's well-being, including physical, mental and financial health. Why it's important: Well-being plays a critical role in employee engagement, performance and retention. It also helps make our employees, their families and Amgen stronger and more resilient.

Amgen, '2023 environmental, social & governance report'<sup>7</sup>



# Q2. Is there a statement from the CEO signalling the company's leadership commitment to workplace mental health?

CEOs can play a vital role in driving a culture of openness and transparency around mental health. It is good practice for company leaders to demonstrate their personal commitment to mental wellbeing in the workplace.

#### **Benchmark findings**

Of the companies assessed, only 13% (17% in 2023) publish a CEO statement on promoting workplace mental health.

We recognise that some companies cite website quotes or statements from other executive sponsors, such as the chief medical officer, in support of their mental health approach. While we acknowledge the importance of these commitments, the benchmark looks to the CEO – as, typically, the highest-ranking officer of a company – to champion mental health and to signal the importance of the topic to the leadership team. During the assessment process, some companies referenced evidence of CEO commitments on thirdparty websites. While CEO engagement with external stakeholders on mental health is commendable, the benchmark aims to encourage comprehensive reporting on the issue in the company's own public disclosures for maximum transparency.

Businesses that recognise the importance of CEO leadership use a variety of communication channels to demonstrate this support. These channels include statements from the CEO in sustainability reports or on company websites, and corporate policies signed by the CEO.

Here are two examples of a company CEO signalling leadership on mental health.

**87**%

Yes

13%

No

#### **Bristol Myers Squibb**

Region: North America

**Supporting the health and wellbeing of our workforce is a top priority at BMS.** To ensure we have the appropriate resources in place to meet the current and future needs of our employees, we consistently assess the programs and resources needed to support their physical, emotional, work life and financial wellbeing.

Christopher S. Boerner (Board chair and CEO), Bristol Myers Squibb, 'Building a better future: Bristol Myers Squibb 2023 ESG report'<sup>8</sup>

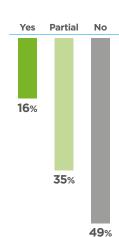
#### Accenture

Region: EMEA

**G** We want our people to feel they are Net Better Off for working at Accenture. This strategy has four dimensions – people feeling healthy and well, physically, emotionally and financially; feeling connected with a sense of belonging; feeling their work has purpose; and feeling they are continuing to build market-relevant skills.

Julie Sweet (Chair and Chief Executive Officer), Accenture, 'Annual report 2023'9





# Q3. Does the company publish an overarching corporate mental health policy (or equivalent)?

It is good practice for companies to formalise their approach to workplace mental health in a policy (or equivalent document). While the existence of a policy (or equivalent) does not guarantee its implementation, the absence of a policy signals that workplace mental health is not a high priority for the business.

#### **Benchmark findings**

We found that 51% of the assessed companies (50% in 2023) publish a formal policy statement, either as a standalone mental health policy or integrated into another corporate policy or disclosure. Out of all the companies, 16% (19% in 2023) provide a detailed description of the processes in place to ensure that the policy is effectively implemented.

A comprehensive policy should include the following:

- a clear statement of why workplace mental health is important to the business (including both the business case and the ethical case for action)
- a commitment to comply with relevant legislation

- a clear position regarding expected standards of workplace mental health
- a description of the processes put in place to ensure the policy is effectively implemented (e.g. senior management oversight, a plan for continuous improvement, performance monitoring and corrective actions if the policy is not being effectively implemented)
- a commitment to continuous improvement and public reporting on performance
- signposts to other corporate commitments which support mental health and 'good work', such as on diversity and inclusion, fair pay, employee consultation and career progression.

During the benchmark research, we found that several companies publish a health and safety policy but do not explicitly include mental health within the scope of their commitments. We encourage companies either to incorporate mental health within these existing policies or to define a standalone policy dedicated to the topic.

Here is one example of a company's policy disclosure.



#### L'Oréal

Region: EMEA





### MENTAL HEALTH RISK

of L'Oréal employees and how we address it

#### **UNDERSTANDING THE RISK**

According to the World Health Organisation, mental health is a state of mental well-being that enables people to cope with the stresses of life, realise their abilities, learn and work well, and contribute to their community<sup>(14)</sup>. Mental health was consistently raised as a major risk across all markets in the workshops held as part of the saliency assessment in 2020-2022. In addition, COVID-19 had detrimental effects

on mental health and long-lasting repercussions, such as psychological distress and symptoms of depression, anxiety or post-traumatic stress<sup>(15)</sup>.

Mental health of employees in our own operations was therefore identified as one of L'Oréal's salient Human Rights risks.

#### **PREVENTION AND MITIGATION**

L'Oréal has a long history of caring for its people. In 2013, we launched our "Share & Care" programme, defining and implementing a worldwide common set of minimum benefits and social practices, going beyond the law in many areas. Its four pillars set out ambitious guidelines and commitments for health, social protection, worklife balance and workplace wellbeing across the globe. The programme also encourages local "social innovation laboratories" for each country to develop initiatives that meet local needs.

On the health pillar, the requirements include:

- The implementation of an Employee Assistance Programme (EAP) or alternative psychological support;
- · Prevention and information campaigns on mental, emotional and physical health;
- · A local policy in each subsidiary aimed at protecting victims of domestic violence.

Our social innovation program "Share & Care" introduced the concept of personal ecology in 2021, to allow every employee to perform at the highest level for the long term.

The "Share & Care" programme has led to the establishment of a research partnership with the International Labour Organization (ILO).

Country Human Relations Directors must report yearly on the implementation of the "Share & Care" programme and action plans must be developed based on the country-level and subsidiary-level assessments. Internal and external audits are undertaken regularly

to check progress.

#### Understanding our risks through the Copenhagen **Psychological Ouestionnaire**

In 2018-19, L'Oréal endeavoured to create a more holistic approach with a stronger emphasis on mental health. To understand our risks, we selected the Copenhagen Psychosocial Questionnaire (COPSOO) a scientific tool for assessing mental stress and strain at work $^{(16)}$ . Pilots of COPSOQ were run in 2019-2020 in France. with more than 4,000 employees having access to the survey. The results showed that the main negative factor related to work/life balance.

#### Conducting employee surveys to collect their perceptions

The Global Leadership Survey is used every year, where more than 2000 L'Oréal managers are evaluated by their peers, the results of which impact their bonus. Questions relating to mental health have now been added, for example, asking employees if they feel their manager has the capacity to create an environment of psychological safety.

l'Oréal also has an annual anonymous employee engagement survey, called PULSE, which includes questions on mental health. In 2022, based on the results of the PULSE survey, L'Oréal started using the 'Wellbeing Index', shared with employees and managers, to measure whether its people feel good in their work. This index includes guestions relating to stress levels at work, respect and work-life balance.

(14) https://www.who.int/news-room/fact-sheets/detail/mental-health-strengthening-our-response/?gclid=CjwKCAiA3aeqBhBzEiwAxFiOBtDIIK4r4PO\_ n3Zl2wrJQyuPk48wAtSyNLxO4sMqCauf179z7jmFFRoCy48QAvD\_BwE (14) https://w

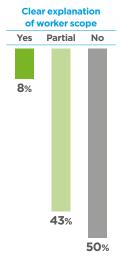
(16) The COPSOQ has been recognised by the EU Occupational Safety and Health Agency and cited in reference documents of the WHO and ILO has been recognised by the EU Occupational Safety and Health Agency and cited in reference documents of the WHO and ILO

L'Oréal, 'Human rights report'<sup>10</sup>

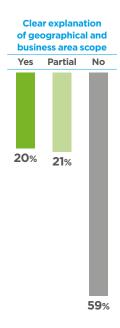
<sup>(15)</sup> https://www.who.int/news-room/feature-stories/detail/the-impact-of-covid-19-on-mental-health-cannot-be-made-light-of

# Q4. a) Does the policy statement (or equivalent) provide a clear explanation of worker scope?b) Does the policy statement (or equivalent) provide a clear

explanation of geographical and business area scope?



Due to rounding, the percentages do not total 100%.



Understanding the scope of a policy is vital in understanding the breadth of a company's commitment to action on workplace mental health. To score highly for this question, companies must apply a universal approach to managing mental health at work that covers all employees and contingent workers (e.g. contractors, interns, gig workers and temporary staff) across all geographies and business activities.

#### **Benchmark findings**

We found that 51% of the companies have published a formal mental health policy. In relation to the first part of this question, 8% of all benchmarked companies (9% in 2023) provide a clear definition of worker scope that extends beyond employees to include contingent workers. An additional 43% (41% in 2023) either indicate that the scope is limited to employees or refer more broadly to, for example, 'our people'. In these latter cases, it is difficult to determine whether a company's corporate commitments on mental health extend to all workers.

Concerning the second part of this question, 20% of all benchmarked companies (20% in 2023) clearly state that their policy covers all business areas and geographies. An additional 21% (20% in 2023) either imply the scope but do not explicitly define it or describe only a partial scope in terms of business operations.

Here are two examples of companies providing clear definitions of the worker or geographical scope of their mental health policies.

#### Novo Nordisk

#### Region: EMEA

**We employ more than 50,000** people worldwide, all of which we have a clear commitment to provide a healthy and safe working environment for. Supporting safety, physical health and mental wellbeing is fundamental to personal and professional growth. We offer a healthy and engaging workplace, supported by a comprehensive Health and Safety programme. To this end, we have implemented our Health and Safety management system across our entire global organisation to ensure such conditions for all employees and contractors. 55

Novo Nordisk, 'Sustainable business: social'<sup>12</sup>

#### Region: EMEA

Prosus

**f** The objective of this policy is to set out our commitment to a safe and healthy work environment for everyone involved in our operations and the principles that apply throughout the Group. ... We are committed to providing a safe and healthy environment for employees, contractors and visitors across our operations. ... All Group companies must ... ensure their OHS [occupational health and safety] programme is risk-based and designed and implemented to include both physical health and safety hazards, as well as mental health and well-being considerations.

Prosus, 'Occupational health and safety policy'<sup>11</sup>

# Q5. Does the company have a clear management commitment to encouraging a culture of openness on mental health?

A culture that encourages openness and dialogue around mental health and works towards eliminating stigma will enhance the effectiveness of the company's workplace mental health strategy and support the strategy's implementation. This question looks for companies that make clear statements indicating a management commitment to develop a culture that:

- proactively changes the way people think and act about mental health by raising awareness and challenging mental health stigma
- encourages two-way conversations about mental health and highlights the support available at all stages of employment
- empowers employees to champion mental health and positively model mental health in the workplace.

#### **Benchmark findings**

We found that just 29% of the assessed companies (31% in 2023) publicly commit to encouraging a culture of openness on mental health. Companies that recognise the importance of a supportive culture highlight their commitments within corporate policies, reports or relevant website pages.

Some companies describe initiatives that are deliberately designed to encourage a culture of open dialogue on mental health. This question, however, is looking for evidence of a formal management commitment.

Here are two examples of companies setting out clear commitments to encouraging a culture where mental ill-health in the workplace is destigmatised.

#### BHP Group

#### Region: Asia Pacific

Mental Health has been a company priority at BHP since 2015. A big focus of our strategy to date is to acknowledge and destigmatise and support those experiencing mental ill health.

BHP Group, 'Wellbeing resources'13

#### Commonwealth Bank of Australia



Yes

29%

No

71%

Region: Asia Pacific

We are committed to creating a positive and supportive workplace which helps our people be their best. This includes creating a mentally healthy workplace where our culture is supportive for those experiencing mental ill-health and provides our people opportunities to thrive.

Commonwealth Bank of Australia, '2023 annual report'<sup>14</sup>



#### Q6-11. The benchmark's 'good work' indicators

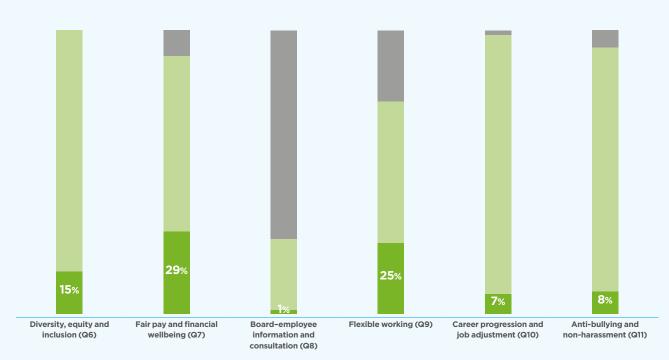
Good working conditions can help to prevent new mental health problems arising and support people with existing conditions to get on in work and thrive. The benchmark methodology is mapped against international standards and management frameworks for workplace mental health, recognising six 'good work' principles that underpin good working conditions:

- Diversity, equity and inclusion (Question 6)
- Fair pay and financial wellbeing (Question 7)
- 3. Board-employee information and consultation (Question 8)
- 4. Flexible working (Question 9)
- 5. Career progression and job adjustment (Question 10)
- Anti-bullying and non-harassment (Question 11)

#### It is good practice for companies to signal their commitment to these principles through relevant workplace standards or policies, and to link these commitments explicitly to supporting workplace mental health.

Across all six questions, we see examples of good practice where companies are making a clear link between their management commitments and mental health. Notably, one company scored maximum points across all 'good work' indicators: HSBC Holdings. Overall, the highest-scoring area is fair pay and financial wellbeing, where just under a third of companies (29%) scored maximum points.

#### Summary of findings: 'good work' policy commitments



No or limited evidence of policy commitment

Clear policy commitment

Clear policy commitment with explicit link to workplace mental health

# Q6. Does the company support the principles of good work by having a formal commitment to diversity, equity and inclusion (DEI)?

A clear position on DEI demonstrates that a company values the benefits that differences bring and is committed to fair and equal treatment of people. A diverse work culture that resembles the diversity that exists in society can support talent attraction and retention, encourage innovation and idea exchange, and optimise service levels. DEI has received growing board attention in recent years because of new disclosure standards, increased investor interest in companies setting representation targets, and heightened public interest in and support for racial justice. Best practice diversity and inclusion programmes recognise the importance of DEI in supporting a culture of good workplace mental health.

#### **Benchmark findings**

Of the assessed companies, 15% (16% in 2023) have published DEI statements that are explicitly linked to mental health. These companies recognise that providing a diverse, equitable and inclusive workplace is important in creating the conditions in which people can thrive and where individuals do not feel excluded because of mental ill-health.

Here are two examples of companies demonstrating a clear link between their commitment to DEI and mental health.

#### Meta Platforms



Partial

85%

No 0%

Yes

15%

#### Region: North America

**G** We are committed to building a diverse, equitable and inclusive workplace in which everyone feels like they belong and is empowered to bring their authentic self to work. ... Embracing diversity, equity and inclusion means we ... invest in the physical, mental and emotional wellbeing of our employees through ongoing education around inclusion and diversity initiatives.

Meta Platforms, 'Build responsibly: the Meta Code of Conduct'^{15}

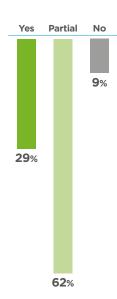
#### Accenture

Region: EMEA



G Our support for mental health and wellness accelerates our culture of equality and helps everyone to thrive.

Accenture, 'Our commitment to inclusion & diversity'<sup>16</sup>



# Q7. Does the company support the principles of good work by having a formal commitment to fair pay and financial wellbeing?

Employers play an important role in improving the financial wellbeing of their workers. This includes paying people sufficiently and fairly; offering secure, good-quality jobs; and providing benefits that extend the value of people's pay. It is also good practice for companies to encourage informed choices around spending, saving and investing through financial guidance, support and education for employees.

#### **Benchmark findings**

Of the benchmarked companies, 29% (25% in 2023) publish a formal policy that recognises the link between financial wellbeing and mental health. Companies that best recognise the impact of financial concerns on mental health not only commit to being equitable employers in terms of fair pay but also take a broad approach to supporting financial wellbeing. Publicised examples of support include personalised financial coaching and financial wellness assessments.

Here are two specific examples.

#### Merck & Co



#### Region: North America

Financial well-being is a sense of security and, for some, a feeling of control over day-to-day and longterm finances. Finances can affect a person's mental and physical well-being, so we're committed to providing the benefits, tools and resources for this important element of overall well-being.

Merck & Co, '2022-2023 annual well-being report'<sup>17</sup>

#### PepsiCo

#### Region: North America

**Me know financial stress impacts** both the physical and emotional well-being of our employees. Healthy Money, our financial wellbeing program, addresses this stress by building financial literacy for our employees, their families and the communities where we operate. Healthy Money provides support for a variety of financial situations, including managing day-to-day finances (budgeting, debt management and savings), establishing good money habits for family finances and preparing for retirement. 55

PepsiCo, 'Employee well-being'18

# Q8. Does the company support the principles of good work by having a formal position on board-employee information and consultation?

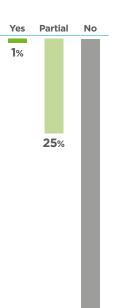
Employees can thrive at work when they are kept informed of the strategic decisions taken by the board and when they feel that their voice is being heard by the highest decision-makers in the company. Board information and consultation involve the board not only sharing information with employees but also listening to their concerns before making important business decisions. While there are certain scenarios where employers are legally obliged to inform and consult with employees (such as redundancy), companies that take a broader approach to employee consultation can cultivate an employee base that understands and values the company's particular culture and strategy. This guestion looks for companies that recognise the interconnectedness between boardemployee information and consultation, and workplace mental health.

It is important to clarify that employee engagement and pulse surveys are evaluated elsewhere in the benchmark (see Question 19). Question 8 looks specifically for evidence of a commitment to board-level engagement with employees on topics covering business strategy, culture and values.

#### **Benchmark findings**

We found that 26% of the assessed companies (38% in 2023) report on boardemployee information and consultation. Similarly to last year, the decrease in the percentage of companies reporting on board-employee dialogue is likely to be explained, to a large extent, by our methodological refinement. We continue to emphasise workforce engagement specifically by the board rather than by the company more generally. Only 1% of companies (4% in 2023) acknowledge the importance of board consultation with employees as a key driver of good mental health.

Here is an example of a company linking board-employee information and consultation with mental health.



74%

#### **HSBC** Holdings

**Employees** 

#### Region: EMEA



We want to continue to be a positive place to work and build careers, with the success of the Group's strategy dependent upon having motivated people with the expertise and skills required to deliver it.  Employee events, including leadership forums, webcasts, townhalls, global jams, off-sites and employee Exchanges, as well as events that form part of the workforce engagement non-executive Director programme

 Interaction with respective employee resource groups across multiple events in many jurisdictions
 Participation in the annual Non-Executive Director

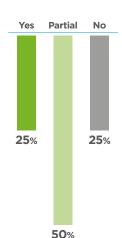
Summit in Hong Kong

 Meeting with colleagues across jurisdictions allowed the Board to hear first-hand the employee voice on important issues.

 These interactions helped to ensure continued connectivity with the workforce, and inform the Board's decision making around people-specific matters. Employee engagement also helps the Board to put into perspective employee Snapshot survey results.

Meeting with employee directors of Group subsidiaries helped to assure the Board that a consistent approach to governance has been adopted across the Group.

HSBC Holdings, 'Annual report and accounts 2023'<sup>19</sup>



# Q9. Does the company support the principles of good work by having a formal position on flexible working?

Flexible working can benefit all employees, including those with caring responsibilities. Employers that encourage a work-life balance recognise that flexible working allows people greater control over how they meet work and non-work demands. As such, flexible working can be an important way to improve employee satisfaction and overall workforce retention.

#### Benchmark findings

Of the companies assessed, 75% (75% in 2023) publish a formal commitment to flexible working. A quarter (25%) of companies (26% in 2023) explicitly link the benefits of flexible working with supporting workplace mental health. During the assessment process, we noted that several companies refer to work-life balance in the context of flexible working. Although we believe this balance to be a desirable outcome for employees, we encourage companies to more explicitly acknowledge the links with mental health.

Here are two examples of companies recognising the role of flexible working in contributing to a healthy working environment.

#### AbbVie



**G** Workplace flexibility in where and when we work has always been at the core of AbbVie's commitment to employee work-life well-being. We understand that flexibility looks different for everyone, so we work together to support flexibility to create a win-win for AbbVie employees, teams, patients and customers. Our hybrid work model, Where We Work, enables eligible employees to work remotely on average two days per week, helping sustain high performance, productivity and engagement.

AbbVie, '2023 ESG action report'20

#### **Novartis**

#### Region: EMEA



**G** As Novartis continues to evolve into a focused medicines company, we understand the need to move to a hybrid working model. We want to build strong connectivity while continuing to offer our people flexibility in how they work. True hybrid working is about adapting the work environment to the work to be done. In our case, our work can change the course of millions of individual lives. Our unbossed working environment offers flexibility to how people work, where appropriate. This is enhancing wellbeing and collaboration, whilst fostering connectedness, developing our talent, stimulating creativity and driving innovation.

Novartis, 'We are inspiring our people'21

# Q10. Does the company support the principles of good work by having a formal position on career progression and job adjustment?

Good workplaces can support good mental health throughout an individual's career by offering them opportunities to make progress and enhance their career pathways. Good workplaces can also provide opportunities to make reasonable adjustments to work schedules, duties and workload when mental health concerns arise.

#### **Benchmark findings**

Almost all (99%) of the companies assessed (93% in 2023) report on their commitment to career progression and job adjustment but only 7% (10% in 2023) clearly link these commitments to workplace mental health. Question 10 looks for companies that not only commit to providing career development opportunities but also commit to accommodating job adjustments and providing additional support as needed on mental health grounds. Examples could include commitments to incorporate mental health into induction processes or performance review processes, or to adjust work schedules or roles to accommodate mental health needs.

Here are two examples of companies linking career progression and job adjustments with mental health.

#### Medtronic



**G** Supporting our wellbeing is fundamental to our Company's values. Employee wellbeing means, in part, that we each feel valued as a contributor and have a sense of belonging within our Company. It means that we get timely and honest feedback about our work and our professional development.

Medtronic, 'Our Code of Conduct'22

#### Sanofi



**G** Performance Impact is our approach to continuously driving and assessing employee performance. Embedding our Play to Win behaviors, Performance Impact is designed to help everyone have a greater impact and enjoy a purposeful career. It focuses on setting stretch goals aligned with the business and creating a feedback culture through regular check-ins for delivering the greatest impact, as well as a stronger individual and collective performance. It consists of 'key moments in time' that guide employees through the year:

- 1. Agile stretch goal setting and priority alignment during January.
- 2. Three regular check-ins between employees and managers, focusing conversations on wellbeing topics, career development and progress on goals.
- 3. Holistic impact level assessment at the end of the year. 55

Sanofi, 'Employee benefits & wellbeing: our global approach'23



Partial

No 1%

Yes



86%

# Q11. Does the company support the principles of good work by having a formal position on anti-bullying and non-harassment, or equivalent?

Difficult relationships at work can be stressful and make a job harder to cope with. Important frameworks and publications on workplace mental health, such as the ISO 45003 standard<sup>24</sup> and the World Health Organization's guidelines on mental health at work,<sup>25</sup> provide clear links between good work and the absence of bullying and harassment in the workplace. We encourage companies to implement organisational practices aimed at mitigating the impacts of these negative behaviours, and to respond actively and appropriately when incidents of bullying or harassment occur.

#### **Benchmark findings**

We found that 94% of the benchmarked companies (92% in 2023) publish a formal position on anti-bullying and nonharassment. However, only 8% (11% in 2023) of companies link their policy commitment to workplace mental health by, for example, acknowledging the adverse impact of such behaviours on mental wellbeing.

Here is an example of a company linking non-harassment with mental health.

#### **Toronto-Dominion Bank**

Region: North America



**G** TD unconditionally prohibits and will not tolerate, ignore or condone harassment, discrimination or violence (including sexual harassment/violence), collectively referred to as 'Unacceptable Behaviour'. We recognise that Unacceptable Behaviour can negatively impact our colleagues' mental health and overall well-being.

Toronto-Dominion Bank, 'TD's approach to mental health in the workplace'26



Q12. a) Has the company assigned board or senior management responsibility for workplace mental health?b) Has the company assigned day-to-day operational management responsibility for workplace mental health?

Both oversight and implementation responsibilities are important when managing mental health in the workplace. Oversight is necessary to ensure that senior management is aware of the business implications of workplace mental health and is prepared to intervene when needed (e.g. if there are tensions between the organisation's workplace mental health policy and other business objectives). It can be the case, however, that those charged with oversight are somewhat removed from the details of how to manage workplace mental health effectively on the ground. It is important that specific individuals or committees are made responsible for ensuring that the workplace mental health policy is appropriately implemented and that workplace mental health is effectively managed.

#### **Benchmark findings**

Of the companies assessed, 28% (31% in 2023) disclose details of high-level oversight in the form of board or senior manager responsibility for mental health

strategy and development. Meanwhile, 21% of benchmarked companies (27% in 2023) publish information on day-to-day management responsibility for workplace mental health – with this responsibility typically residing within the health and safety or human resources function. A few companies have appointed wellbeing managers or similar specialist roles to maintain operational responsibility for workplace mental health.

Just over half of the assessed companies (51%) publish a formal policy statement on mental health at work. However, the majority of the companies in the benchmark have yet to describe any governance structures they have put in place to ensure the effective implementation of these policy commitments.

Here are two examples of companies that have assigned strategic oversight or operational responsibility for workplace mental health.

4

Region: North America

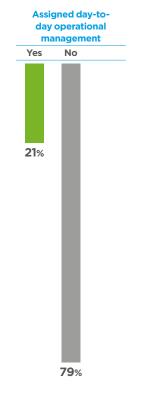
Walmart

**G** Under its charter, the CMDC [Compensation and Management Development Committee of the Board] has responsibility for reviewing and advising management regarding Walmart's human capital management strategies, and the CMDC and the Board oversee Walmart's workforce strategy, which includes the strategic priorities of inclusion, well-being, growth, and digital transformation. Management regularly presents to the CMDC and to the Board regarding workforce development; compensation; benefits; recruiting and retention; training and education; culture; and belonging, diversity, equity, and inclusion at all levels of the company.

Walmart, 'Notice of 2024 annual shareholders' meeting'27

Assigned board or

senior management oversight



#### SAP

Region: EMEA



"Understanding and respecting people's needs in regard to their health, safety and well-being pays off, as it keeps them happy and resilient to thrive in the Future of Work."

Dr. Natalie Lotzmann

Global Vice President HR, Chief Medical Officer, Head of SAP Global Health, Safety, and Well-Being People & Operations | Future of Work

SAP, 'Health, safety & well-being commitment statement'28

# Q13. Has the company set objectives or targets for the management of mental health in the workplace?

Objectives and targets are the point at which policy commitments are translated into action, and resources and responsibilities are allocated for their implementation. Investors place significant emphasis on published objectives as a sign of a company's commitment to continuous improvement on a specified business issue. Investors also recognise that published objectives provide an important accountability mechanism as they create an expectation that companies will publish updates on progress against their stated commitments.

#### **Benchmark findings**

We found that just under a fifth (19%) of assessed companies (19% in 2023) publish clear mental health-related objectives. Only 5% of the companies (1% in 2023) clearly describe the steps they are taking to achieve these targets. Examples of reported objectives and targets include ones relating to workforce participation in wellness programmes, the expansion of EAP (employee assistance programme) coverage and the number of mental health first aiders trained.

Here is an example of a company that publishes mental health-related objectives and targets.

#### Shell

Region: EMEA



**G** Our five-year goals are to attain a survey participation rate of over 80% and to achieve survey data that shows over 50% of our employees adopting behaviours that optimise mental health and wellbeing. The survey data will also inform our ongoing work and commitment to build a workplace culture that supports the mental wellbeing of employees. ...

To optimise programme participation and adoption of healthy behaviours, the survey and toolkit are rolled out and scaled in lines of business by Programme Leads. These employees act as champions for the programme and for mental wellbeing within their businesses and facilitate employee feedback into the programme's continuous improvement cycle.

Line Managers and Programme Leads, whose teams are entering the programme, are offered two training modules in building psychological safety in their businesses and having conversations about mental health with their teams. This training aims to build a supportive workplace culture and reduce sigma around stress, burnout and mental ill health so that employees feel safe to ask for support and to access professional mental health services.

Shell, 'Employee health and wellbeing'29

Partial

14%

No

81%

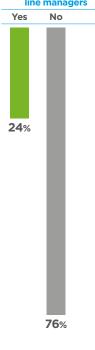
Yes

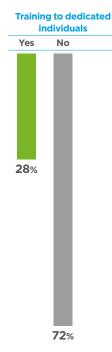
5%

#### Q14. a) Does the company provide mental health training to line managers?

b) Does the company provide mental health training

to dedicated individuals (e.g. mental health first aiders)?





Effectively implementing a workplace mental health policy relies on competent managers to oversee the process. It also relies on companies nominating dedicated individuals who are empowered to become points of contact for those experiencing mental ill-health or emotional distress and to nurture a positive environment for mental health within the organisation. Line managers and other designated individuals trained in mental health awareness are equipped to listen, reassure and respond appropriately to workers experiencing mental ill-health. Having such designated roles within an organisation means that early signs of distress are more likely to be spotted. These people will also be better able to direct individuals to relevant support resources that might prevent progression to long-term sickness.

It is important to clarify that we regard mental health training for all employees as a way of raising awareness. This means that workforce training is covered elsewhere in the benchmark (see Question 15). Question 14 looks specifically at equipping line

managers and designated individuals with the knowledge and skills to take appropriate and timely action on mental health issues in the workplace.

#### **Benchmark findings**

We found that 24% of assessed companies (22% in 2023) currently report on the provision of training to line managers, and that 28% (26% in 2023) provide evidence of training to dedicated individuals, such as mental health first aiders. This data indicates a lack of corporate investment in equipping front-line employees to promote positive mental wellbeing and to support colleagues in times of mental distress. We urge companies to invest in mental health training for managers, in particular, to align with the World Health Organization's guidelines on how best to support worker mental wellbeing.<sup>30</sup>

Here are two examples of companies publishing details of their mental health training for line managers or designated colleagues.

#### **Goldman Sachs Group**

Region: North America



**We are continuing to develop a global cohort of Mental Health First Aiders** (MHFAiders). In 2023, we trained 600 MHFAiders, and we are on track to reach our goal of 1,000 MHFAiders by the end of 2024. These colleagues receive internationally recognized and certified training to be better able to connect our people to mental health and resilience resources in times of need.

Goldman Sachs Group, '2023 people strategy report: people, teamwork, and excellence'31

# line managers

Training to

#### **TotalEnergies**

Region: EMEA



Secondary prevention consists of raising awareness among all employees with an MHR [Mental Health Risks] prevention kit. ... [The kit] consists of a methodological guide for site managers and two practical guides for managers and employees. ...

Aware of the key role played by managers in the psychological equilibrium and mental health of their employees, the Company is making them aware of their role in preventing these risks on a daily basis and of the impact of the working environment on the well-being of their employees. ...

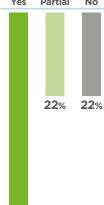
Managers are responsible for the development of their team and the attention paid to the workplace and to the well-being of their employees on a daily basis, in addition to the management of the activity. A training program allows them to develop their skills from the moment they take up a management position and throughout their subsequent career. This course is made up of a common core that includes awareness of mental health risks in particular.

TotalEnergies, 'Universal registration document 2023'32



Q15. a) Has the company developed formal initiatives or programmes to raise awareness of mental health in the workplace? b) Has the company developed formal initiatives or programmes to raise awareness of mental health in the workplace that extend beyond employees and contingent workers (e.g. to customers and/or suppliers)?

#### Formal initiatives or programmes developed Yes Partial No



**Customers and/or** 

suppliers involved?

No

56%

Yes

24%

In addition to having a clear policy on mental health in the workplace, companies should develop and implement initiatives aimed at raising awareness and promoting an understanding of workplace mental health.

#### **Benchmark findings**

Of the companies assessed, 56% (60% in 2023) report multiple awareness-raising initiatives or programmes. Several companies have mature initiatives aimed at increasing awareness and encouraging proactive and preventative behaviours through, for example, internal awareness campaigns and wider workforce training sessions. Encouragingly, almost a quarter (24%) of the benchmarked companies (10% in 2023) now provide evidence of initiatives that extend beyond the workforce to partners in the value chain.

Here is an example of one company's internal awareness-raising initiatives and an example of another company's initiative to raise awareness of mental health in the value chain.

#### Oracle





As part of 'My Wellbeing, My Life', we run monthly wellbeing campaigns, such as cancer awareness, sleep training, mindfulness, and mental health awareness. As part of Mental Health Awareness month, for example, we ran two a series of popular webinars to encourage employees and managers to take proactive steps to improve their mental wellbeing. ... We use SLACK as a wellbeing communication channel, with approximately 2,000 employees now following the channel with high levels of engagement. A monthly wellbeing employee newsletter 'My Wellbeing, My Life', together with a dedicated website, contain all the available resources in one place.

Oracle, 'Encouraging vitality and a healthy quality of life'<sup>33</sup>

#### Meituan





**Solution** We regard couriers' physical and mental health as a priority. ... We have set up courier's [sic] mental health counselling hotline and mental health miniclasses, helping them relieve pressure and negative emotion in their daily work and life, and maintaining a positive and optimistic mindset in a scientific and comprehensive manner. **35** 

Meituan, '2023 annual report'<sup>34</sup>

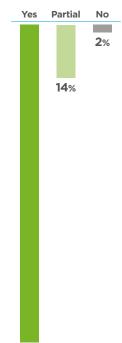
# Q16. Does the company provide access to mental health services and support either internally or externally?

It is important for companies to provide appropriate support on mental health to workers through internal or external resources. In addition to companies having a clear policy on mental health in the workplace, we encourage them to develop and implement a systematic programme of activity that supports this policy.

#### **Benchmark findings**

We are pleased to note that 84% of the assessed companies (78% in 2023) provide employees with access to multiple (as opposed to single) mental health support services. It is encouraging that employers are continuing to report on a variety of support initiatives to suit the varying needs of their workforce. We also note that the percentage of companies publishing details of at least one mental health service or support initiative remained consistently high between 2023 (95%) and 2024 (98%). Such services include EAPs (employee assistance programmes), clinical counselling and digital wellbeing apps.

Here are two examples of companies providing access to mental health services and support.



84%

#### Qualcomm

Region: North America

#### Mental Health Resources

#### Employee Assistance Program (EAP)

Provides quick and easy access to confidential counseling and referral services to help deal with daily work and life challenges. It's available at no cost to employees, their dependents and household members.

#### meQuilibrium

Designed to help you discover simple techniques to build personal and organizational resilience and shift your response to stressful thoughts and situations.

#### Rethink

Rethink provides 24/7 access to tools and support for family members and providers working with children who are facing learning, social, or behavioral challenges, or a developmental disability. All services and tools are provided at no cost.

Qualcomm, 'US benefits'<sup>35</sup>

# 4

#### AT&T

Region: North America

We offer services and opportunities for all employees to take care of their mental health, including:

- Employee Assistance Program: AT&T's Employee Assistance Program (EAP) provides professional and confidential assistance to employees and their families who experience work-related or personal challenges.
- Supplemental Therapy Program: In addition to our core EAP, we have expanded therapy visits through a supplemental program focused on getting our employees quicker access to high-quality, outcomes-based short-term therapy.
- Resilience & Mindfulness Service: We offer a digital resilience building and mindfulness service to help employees focus on stress and anxiety management, work on exercises for building resilience, and ultimately focus on their emotional needs.

AT&T, 'Human capital management'<sup>36</sup>



Q17. Does the company encourage openness about mental health and offer appropriate workplace adjustments to workers who require them throughout their career life cycle (e.g. during recruitment, on-boarding, career development, performance reviews and return to work)?

Mentally healthy workplaces design employment processes with accessibility in mind, enabling individuals with existing mental health conditions to access employment opportunities and to request appropriate workplace adjustments, such as skills training, management support and flexible working.

This question looks to assess whether companies encourage communication and provide support on mental health throughout the employment life cycle and make reasonable adjustments when required.

We encourage employers to adopt a holistic approach to mental health and consider the support that can be provided at all stages of an individual's career with the company. Support should start at the point of recruitment and continue through the induction programme, performance management reviews, conversations about career progression, and, where applicable, meetings about returning to work or about job adjustments. This question looks for evidence of management processes rather than stated management commitments.

#### **Benchmark findings**

We found that 9% of the assessed companies (10% in 2023) report on how mental health is considered during employment, citing initiatives such as including mental health discussions in performance reviews and partnering with a third party to support employees with re-entry to work after mental health leave. It seems likely that this is an under-reported topic as companies may not be systematically capturing data internally, making it difficult to publish externally.

Some companies report on workplace accessibility and recruitment in relation to disability. It is not always clear in the reporting, however, that mental health is included in the company's definition of disability. We encourage companies to clarify that mental health is specifically considered in discussions involving workplace accommodations.

Here is an example of a company's mental health support for employees during the career life cycle. 91%

Yes

9%

No

#### Hermès International

#### Region: EMEA

**C** The House of Hermès pays constant attention to the well-being and physical and mental health of all employees, in particular by helping them to balance their professional activity and their personal life. As part of this ambition, on 19 July 2023, Hermès signed a Group agreement with all of the representative trade unions at Group level (CFDT, CFE-CGC, CGT, FO) on balancing the various times of life. The main measures of this agreement came into force on 1 January 2024 in all Group companies in France. These measures aim to better support those who are faced with certain personal situations impacting their daily professional life (caregivers looking after a loved one with a loss of autonomy, due to illness, disability or age; parents; people in vulnerable situations). For these three aspects, various measures were negotiated, taking care to provide responses adapted to the diversity of the situations encountered. [For example] for caregiver employees: By providing an information and assistance platform for the most common situations, offering flexibility in more demanding situations, and freeing up time through financial support in the most difficult situations.

Hermès International, '2023 universal registration document'37

Q18. a) Are employees given the opportunity to directly contribute to the design or development of workplace mental health initiatives? b) Does the company adapt mental health programmes to local contexts?

 Employees

 contribute to mental

 health initiatives

 Yes
 No

 13%

87%

Adapt programmes

to local contexts

No

Yes

**4**%

It is good practice for companies to encourage and enable employees to contribute directly to the design and/or development of mental health initiatives as this can support a culture of openness about mental health. It is also good practice for companies to adapt mental health programmes to local contexts based on an assessment of local needs and workforce diversity.

#### **Benchmark findings**

Among the companies assessed, 13% (15% in 2023) report that employees have directly contributed to the design and/or development of workplace mental health initiatives. This question does not look for evidence of employee participation in voluntary initiatives but instead seeks evidence of activities that are instigated or enhanced by employees. The most oft-cited examples from benchmarked companies are activities undertaken by mental healthfocused employee resource groups.

Question 18b, on adapting mental health programmes to local contexts, is a new indicator for the benchmark this year. We added it in order to align the methodology more closely with a policy brief published by the World Health Organization (WHO) and the International Labour Organization on the WHO guidelines on mental health at work.<sup>38</sup> We note that 4% of companies provide sufficient evidence to score the newly available five points for this question. An example of an adaptation includes the provision of small group sessions with a therapist to discuss critical local events. This question looks for companies to go beyond simply reporting on different initiatives in varying geographies and instead to describe how they vary their programmes to meet local needs.

Here is an example of a company involving employees in the design and implementation of a workplace mental health initiative and an example of a company adapting mental health programmes to local contexts.

#### **Toronto-Dominion Bank**

#### Region: North America



**Solution** We encourage colleagues to lead and contribute to mental health initiatives in the workplace. For example, as part of our 2023 Mental Health Awareness Month campaign, our colleague-led North American Customer Operations Black Experience and People with Disabilities committees hosted an intersectional webinar 'Mental Health and the Black Experience', available to all colleagues. ...

Additionally, our TD United Pan-Asian Employee Resource Group hosted intersectional events around mental health in 2023, including 'Navigating the Asian American Identity and the Effects on Well-being' and 'Mental Health in the Asian Community'.

Toronto-Dominion Bank, 'TD's approach to mental health in the workplace'39

96%

# 4

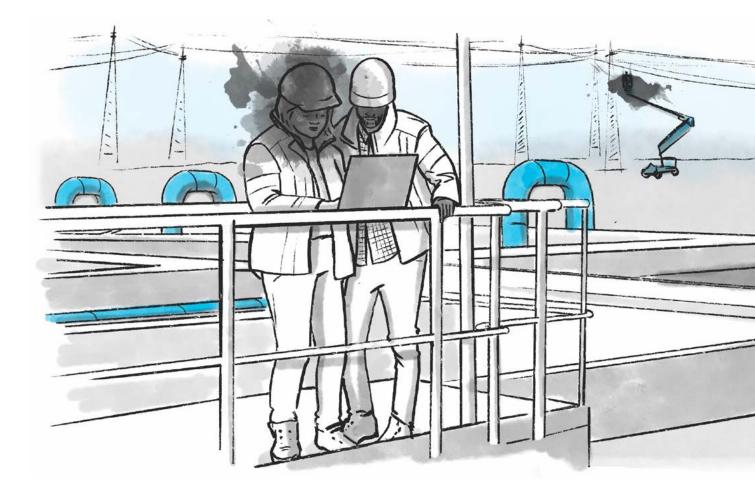
#### Chevron

#### Region: North America

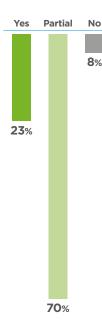
**I** In 2022, many of our employee networks organized mental, emotional and physical well-being events and highlighted work-life services. Our Women's Employee Network focused on burnout, and our XYZ Employee Network highlighted the importance of emotional and physical well-being. ...

Wellness Ambassadors created within our employee networks encourage health equity by partnering with Health & Medical to provide targeted health awareness programming that is culturally adapted. Inclusion as a driver of well-being was a focus of Black Employee Network (BEN) panel discussions. BEN raised awareness of mental health issues among people of color and provided a space to discuss topics related to emotional and mental well-being. Responding to uncertainty experienced by employees returning to office locations, our Hispanic and Latin American employee network (Somos) hosted emotional well-being sessions. Sessions addressed cultivating healthy boundaries at work and home, embracing change and similar topics.

Chevron, 'Enabling human progress: 2022 corporate sustainability report'40



Q19. Does the company have formal processes for measuring employee engagement (e.g. confidential pulse survey, engagement panel) and does this information support workplace mental health measurement and initiatives?



Due to rounding, the percentages do not total 100%. Effective systems to measure employee engagement provide near real-time measurements of satisfaction and can provide useful insights to management. Meaningful employee engagement data can also support the implementation or adjustment of a company's mental health approach.

#### **Benchmark findings**

Even though 93% of the assessed companies (95% in 2023) measure employee engagement, only 23% (22% in 2023) describe how the resultant data influences their mental health strategy. The top-performing companies for this question usually describe how specific pieces of employee survey feedback have helped them prioritise and improve particular aspects of their mental health strategy or employee offering.

Here are two examples of companies' approaches to measuring employee engagement and using the resulting data to inform mental health initiatives.

#### **ASML Holding**

Region: EMEA



**G** Well-being is measured primarily through the well-being score in our we@ASML engagement survey. Our target was to improve from 77% in 2022 to 78% in 2023. From the 2023 survey, our well-being score improved from 77% in 2022 to 81% in 2023, which is above our targeted score.

Through a deep dive into the actual survey results, we have identified those groups of employees where wellbeing scores need to be improved, and we will define tailored interventions to execute on this in close cooperation with managers and HR business partners. For 2024, we aim to maintain an overall well-being score of 81%, and no scores on individual questions within the well-being index below 75%. We expect this to be a stretch considering the circumstances in the world and the semiconductor industry. Our key focus areas will be maintaining a healthy work-life balance and managing stress – we will work with leaders and managers to consistently reduce work pressure.

ASML Holding, 'Small patterns, big impact: 2023 annual report'41

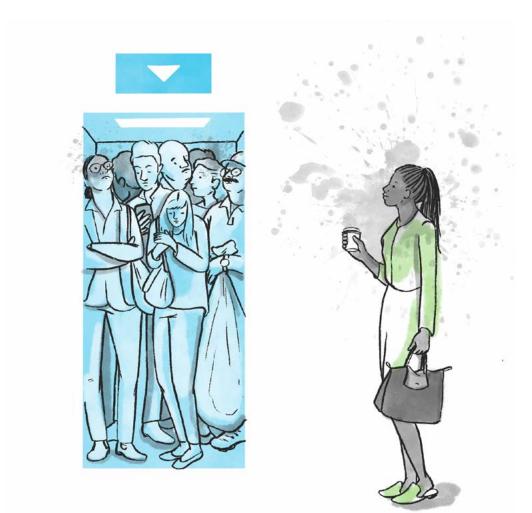
#### Tencent Holdings

#### Region: Asia Pacific



**Solution Solution Solution**

Tencent Holdings, 'Environmental, social and governance report 2023<sup>42</sup>



# Q20. Does the company independently assure its mental health management system against a recognised framework or standard?

Yes Partial No 0% 3%

Mental health assurance or accreditation schemes, against standards such as ISO 45003:2021,<sup>43</sup> provide frameworks for managing workplace mental health and help companies to improve and test their approach. They can also play an important role in promoting higher standards and driving best practice.

#### **Benchmark findings**

This question was adjusted this year to align the methodology more closely with the World Health Organization (WHO) and International Labour Organization policy brief on the WHO guidelines on mental health at work.<sup>44</sup> The main alterations were:

- The requirement for full points changed from disclosure of multiple assurance standards to evidence of thirdparty ISO 45003:2021 certification (covering occupational health and safety management, and psychological health and safety at work).
- The number of partial points available changed from five to three.

We have not included year-on-year data for this indicator as it is not comparable.

We found that none of the benchmarked companies report having achieved independent assurance of their mental health management system against ISO 45003:2021. Given the relatively recent introduction of the standard, we anticipate that the proportion of companies seeking third-party certification will increase over time.

A small number (3%) of the benchmarked companies scored partial points for publishing details of country-level certifications or evidence of preparation towards independent assurance against ISO 45003:2021. Here are a couple of examples.

#### ServiceNow



#### Region: North America

In 2023, we continued the multiyear process of developing and implementing an occupational health and safety management system to cover all workers. In addition, we focused on aligning with the ISO 45001 and ISO 45003 standards and other local, national, international, and industry-specific standards, such as OSHA [Occupational Safety and Health Administration<sub>1</sub>. ANSI [American National Standards Institute], and the California Code of Regulation (Title 8, 5193). This work continued from 2022, and we are working with a vendor to obtain a certification for ISO 45001 and ISO 45003. 55

ServiceNow, 'Global impact report 2024'45

#### Amazon.com



Region: North America

**C** In October 2022, in recognition of our commitment to promoting mental health support, Amazon was awarded the Platinum Bell Seal for 2023 by Mental Health America (MHA). This award is granted to employers who provide access to mental health resources, promote a culture of wellness, and implement policies and practices that support the mental health of employees. The Platinum Bell Seal is the highest level of recognition offered by MHA.

Amazon.com, '2022 safety, health, and well-being report  $^{\!\!\!\!\!\!\!\!\!^{46}}$ 

97%

#### Leadership and innovation

Q21. a) Does the company participate in industry or academic initiatives or partnerships aimed at promoting positive workplace mental health?

b) Does the company engage customers and/or suppliers in initiatives or programmes aimed at promoting positive mental health?

Workplace mental health is a collective matter for businesses and their industry sectors, as well as being an individual concern for companies to manage. Making progress and raising standards internationally requires individual companies to:

- support academic research and other development programmes to improve workplace mental health
- share knowledge and expertise with industry peers
- support public policy debates around workplace mental health
- support industry and stakeholder initiatives directed at improving workplace mental health.

#### **Benchmark findings**

Of the companies assessed, 14% (20% in 2023) report on their participation in industry or academic initiatives aimed at promoting and improving mental health at work. To receive the maximum score, companies need to demonstrate not only that the initiative or partnership has a clear mental health dimension but also that they play a substantial role through dedicating reasonable time, resources or expertise.

We found that 9% of companies (15% in 2023) describe their involvement in initiatives or partnerships that extend beyond the workforce to include customers, suppliers and/or communities.

Here are two examples of companies that participate in industry initiatives or academic partnerships aimed at promoting workplace mental health.

# Yes Partial No 3% 11% 86%

Customer and/or supplier engagement

No

Yes

9%

•/•

#### Apple

#### Region: North America

**If** In 2022, we partnered with a prominent university in China mainland to enhance our holistic approach to health and wellness by conducting a four-week pilot on mindfulness and positive management training with select line leaders and production managers. Based on the positive results of that pilot, we expanded the program to over 3,900 employees across 33 supplier sites in 2023.

Apple, 'People and environment in our supply chain: 2024 annual progress report'47



#### **PayPal Holdings**

Region: North America

# Advancing Financial Security With the Financial Health Network

For 20 years, the <u>Financial Health Network</u> has built a movement of leaders and organizations committed to improving people's financial lives, and PayPal has been a proud partner since 2015. Recently, we worked with the Financial Health Network in partnership with JUST Capital and the Good Jobs Institute to advance the Worker Financial Wellness Initiative, a program designed to engage with corporate leaders to make worker financial security a priority. The initiative helps companies learn about worker financial health benefits and asses the conditions of their own workforce. See <u>Employees & Culture</u> to learn about how we promote employee financial wellness.

"We have been proud to partner with PayPal over the years, most recently in our efforts to improve employee financial wellness by encouraging corporations to assess and address the financial health of their workforce. Together we built a corporate movement to make this critical issue a C-suite priority and



drove improved wages and benefits for one million workers."

JENNIFER TESCHER

May 2024

PayPal Holdings, '2023 global impact report'48



# Q22. Does the company provide examples of employee communications on workplace mental health?

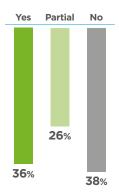
Companies should encourage openness and transparency about mental health across the organisation. Providing opportunities for employees to share personal stories and to participate in internal campaigns can be helpful in engaging employees and other audiences on the issue of mental health.

#### **Benchmark findings**

Of the assessed companies, 62% (56% in 2023) publish examples of employee communications on mental health, and 36% (30% in 2023) provide multiple examples of

continuous and sustained communications or substantial disclosures. Examples include social media posts on mental wellbeing and company website articles in which employees share their lived experiences of mental health challenges or self-care activities.

Here is an example of a company's approach to employee communications where personal stories from employees on mental health are shared to encourage openness about, and raise awareness of, mental health.





#### **Union Pacific**

Region: North America

#### 'I Didn't Know What Else to Do': Wyoming Signal Maintainer Makes the Call, Now Helps Others

In 2021, Signal Maintainer Scott Davis completed training as a Peer Support volunteer to learn how to help others. But earlier that year, the Engineering employee from Wamsutter, Wyoming, needed someone to answer his own call.

"| was almost a statistic"" Davis said. "I was dealing with a lot of lifechanging events at home, and it took its toll on me. One Saturday morning, I was having a panic attack and didn't know what else to do. I didn't feel safe being alone. I called Peer Support Coordinator **Robert Manlove**, then went to my mom's house."

Manlove listened. Union Pacific's Peer Support volunteers offer sincere, emotional support to peers experiencing a traumatic event, family illness or loss. Togeth-



Scott Davis, signal maintainer, Wamsutter, Wyoming, in 2021 with sons Ryan, 3, and Daniel, 5.

er, they made the decision to call the Employee Assistance Program and start Davis' journey to healing.

"I began seeing a mental health specialist," Davis said. "Without Peer Support, I don't know if I would be here today. It's empowering to know people do care."

Davis recommends Peer Support to his peers: "Anxiety, depression and panic make you feel alone. You're not. If it's obvious that something is going on, listen. We have to learn to be vulnerable to get the help we need."

#### Union Pacific (continued)

Region: North America

#### 'Operation RedBlock Helped Save My Life': Iowa Locomotive Engineer Pays It Forward

When thousand-pound rail cars are on the move, the stakes are high - and substance abuse can't be part of the equation. Operation RedBlock (ORB) volunteers, like **Jeff Fletcher**, help make sure it isn't.

ORB is an employee-led, union-supported and company-sponsored education and awareness effort to maintain a drug and alcohol-free workplace, preventing small problems from becoming big ones. When necessary, volunteers refer team members to the Employee Assistance Program for 24/7 assistance and support in lieu of disciplinary action.

"Operation RedBlock played a big role in saving my life" said Fletcher, locomotive engineer. "I struggled with alcohol, but I have been sober since November 2013."



Jeff Fletcher, locomotive engineer, Council Bluffs, lowa, seeks to help others as an Operation RedBlock local coordinator.

Now Fletcher chooses to pay it forward as a local coordinator in Council Bluffs, lowa, helping fellow railroaders navigate life's challenges.

"It's not just for us; it's for our families"" Fletcher said. "An issue can affect everyone. If you're struggling, it's important - be courageous and ask for help."

Union Pacific, 'Union Pacific employee-led outreach programs save lives, careers'49



# Q23. Does the company publish details of its mental health approach in its annual report and accounts (or equivalent)?

The annual report is an important corporate document disseminated to shareholders that provides an account of the company's financial condition and operations over the previous year. We encourage companies to publish details of their workplace mental health strategy so that shareholders and other stakeholders can evaluate how the company's board is managing the business risks and opportunities related to mental health.

#### **Benchmark findings**

We found that 52% of the assessed companies (45% in 2023) publish workplace mental health disclosures in their annual report and accounts (or equivalent). Only 7% of all companies (5% in 2023), however, provide comprehensive reporting on the commitments made and actions taken to safeguard and support mental health in the workplace. Companies that provide comprehensive reporting on workplace mental health typically include:

- an expressed management commitment to workplace mental health
- a clear position on the company's expected standards of workplace mental health
- a clear description of the governance framework in place for managing workplace mental health, including board or senior management oversight
- a commitment to continuous improvement and public reporting on performance.

Here is an example of a company providing a comprehensive account of workplace mental health strategies within its annual report. 7% 45% 49%

Partial

Yes

No

Due to rounding, the percentages do not total 100%.



#### **Roche Holding**

Region: EMEA



60 | Contents Letters to shareholders Sustainability Report How we contribute Corporate Governance Remuneration Report

### 7. Safety, health and well-being

Roche strives to be an innovative company that our employees are proud to be part of and our partners trust.

We are committed to maintaining the Safety, Security, Health and Environmental (SHE) principles and practices outlined in the Roche Group Code of Conduct.<sup>1</sup> These principles establish a uniform minimum standard for SHE across all Roche companies, workplaces and employees. We expect our suppliers and service providers to uphold these same standards in their own operations.

#### Mental health is top of mind

At Roche, we take mental health seriously and strive to create a culture where everyone can thrive, feeling supported and psychologically safe. The responsibility for workplace mental health is shared at the global and local levels and is supported by senior management. "As a leader, it is my responsibility to prioritise the mental health and well-being of my people. Helping people thrive is a non-negotiable part of a people leader's job. By fostering an open dialogue, we create a culture where everyone can flourish," says Thomas Schinecker, Roche CEO. In 2023, we continued establishing an effective, efficient and holistic global mental health and well-being programme. The programme is centred on three pillars:

 Protection. The assessment of psycho-social risk factors at work is part of the comprehensive workplace risk assessment mandated for all Roche workplaces.

- **Promotion.** We promote mental health and well-being as part of Roche's global well-being initiative LiveWell@Roche.
- Support. Every employee has access to a local employee assistance or counselling programme, including counselling for psychological stress at work as well as in their home life. We also offer a network of dedicated Mental Health Champions and Mental Health First Aiders to help reduce the stigma surrounding mental health conditions and create a safe space for employees.

Since 2020 we have reported on the maturity of health risk assessments and management, in particular for psycho-social risks, and have set ambitious goals for 2020-2025 (see illustration on page 63). Roche was rated as one of the top improvers in the 2023 CCLA Corporate Mental Health Benchmark, which ranks companies based on the strength of their management commitments and public reporting on mental health. We ranked in tier 3 of the benchmark.

#### Well-being

As a company actively shaping the present and future of healthcare, we are passionate about fostering a health and well-being culture at work. Roche's holistic approach to well-being takes both organisational and individual perspectives

1 roche.com/about/governance/code-of-conduct

#### Roche Holding (continued)

Region: EMEA



62 | Contents Letters to shareholders Sustainability Report How we contribute Corporate Governance Remuneration Report

into account. Our global Live Well hub offers over 30 well-being resources for individuals and teams on topics including psychological safety, mental health, mindfulness and gratitude.

We measure and report on employee well-being primarily through our Global Employee Opinion Survey (GEOS) (see table).

#### LiveWell@Roche

Each year our sites hold two Live Well weeks to promote healthy lifestyles and physical, mental and emotional well-being. In 2023, we offered over 50 global events with thousands of employees attending, where we celebrated genuine connections, fostered a sense of community and ignited our sense of purpose. We placed particular emphasis on the topic of women's health, especially menopause, offering keynotes, awareness sessions and guidelines.

In addition, we have a Global Live Well Community that supports employees to care for themselves and others as much as we care for patients. Over 250 dedicated Live Well Champions across the Roche network help boost awareness and impact.

#### Total body well-being

In each country we operate in, we create and support safe and inspirational spaces where employees can have fun, challenge themselves and share their passion. We offer a range of wellness resources tailored to our employees' needs and stage of life, including meditation and mindfulness resources, sleep tools, resilience training, coaching and counselling sessions, as well as fitness options. Many of these initiatives are driven by our employees.

#### Safety in the workplace

All forms of work at Roche must be safe, whether the tasks are urgent, complex or routine. We aim to minimise the number of occupational accidents per year and the number of accidents causing absence from work (lost time accident frequency rate per 200,000 worked hours). Our approach to safety at the workplace has been recognised in the Dow Jones Sustainability Indices, where Roche was rated in the 97th percentile for occupational health and safety compared to the industry benchmark.

#### Employee health and well-being in the Global Employee Opinion Survey GEOS

Indices	2023	2021	2019
Environment and culture <sup>1,2</sup>	76	75	76
Health and well-being <sup>1,3</sup>	73	72	n/a
Impact on overall health <sup>1,4</sup>	66	66	n/a

n/a - not applicable

1 The measures have been gathered according to the independent third party that provides the services for the GEOS survey. Roche aims to continuously

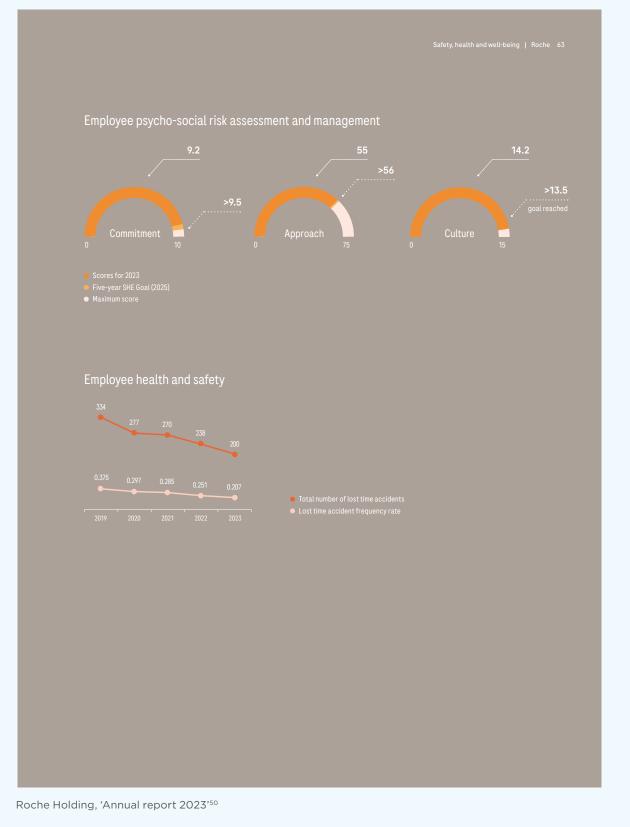
3 Currently, measured through the following two items: "My current state of well-being allows me to perform my job effectively", "I am able to cope effectively with work-related stress" 4 Currently, measured through the following itere: "The impact of work at Roche on my overall health is positive"

improve the used survey measures. Currently, measured through the following three items: "Roche takes a genuine interest in the employees' well-being", "I am able to successfully balance my work and personal life", "Roche offers me a healthy workplace"

#### Roche Holding (continued)



Region: EMEA



# Q24. Does the company report on progress against its objectives or targets related to mental health?

In addition to companies having clear policy commitments and management practices, we encourage them to develop reporting criteria for workplace mental health and to publish details of their progress against objectives or targets. Reporting against objectives serves as an important accountability mechanism.

#### **Benchmark findings**

This question was only scored if companies had reported formal objectives for managing mental health in the workplace (as evaluated in Question 13). We found that 3% of the assessed companies (3% in 2023) provide comprehensive reporting on progress against their objectives. Examples of reported progress include an increased percentage of employees with access to an EAP (employee assistance programme) and improvements in self-reported employee wellbeing metrics against the company's mental health strategy.

Here are two examples of companies reporting on progress against their mental health-related objectives.

#### **HSBC** Holdings

Region: EMEA

f In order to deliver our commitments, HSBC has set the following objectives: ...

Measure the impact of our efforts by aiming to achieve that a significant number of employees who respond to our engagement surveys report:

- Positive mental health
- Feeling confident talking to their line manager about mental health
- Awareness of where to find mental health support at HSBC. **JJ**

HSBC Holdings, 'Mental health at HSBC'<sup>51</sup>

G Our Snapshot survey revealed a slight decrease in mental well-being, with 83% of colleagues rating their mental health as positive, compared with 84% in 2022. However, it also found that 74% of colleagues feel comfortable talking to their manager about their mental health, and 77% said they know how to access mental health support at work. Both increased one percentage point compared with 2022.

HSBC Holdings, 'Annual report and accounts 2023'52



Due to rounding, the percentages do not total 100%.

85%

Partial

13%

No

Yes

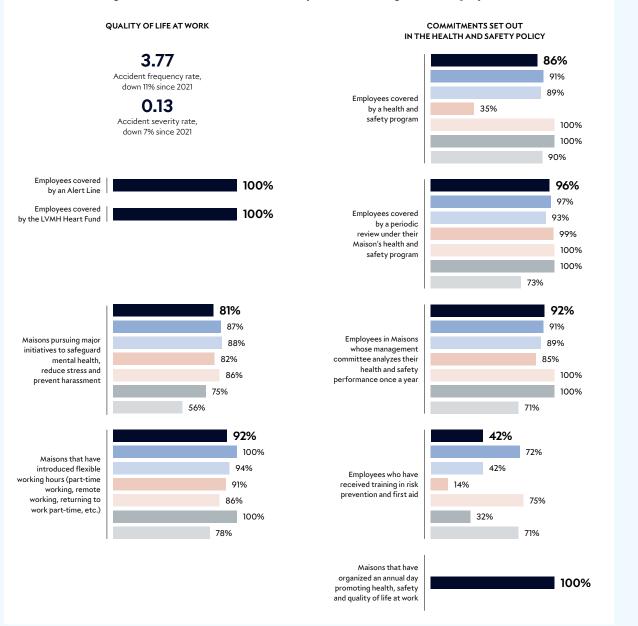
3%

#### LVMH Moet Hennessy Louis Vuitton

Region: EMEA



Taking action to ensure the health, safety and well-being of our employees



LVMH Moet Hennessy Louis Vuitton, '2023 social and environmental responsibility report: committed to positive impact'53

# Q25. a) Does the company report on the proportion of line managers that are trained in workplace mental health?b) Does the company report on the proportion of dedicated individuals that are trained in workplace mental health?

The effective implementation of a mental health strategy and practices relies on managers and dedicated individuals who are competent and confident to oversee the implementation of initiatives and to encourage people to talk freely about their mental health. In doing so, they can help to reduce stigma and encourage early intervention. We encourage companies to invest in the provision of mental health training for line managers and for dedicated individuals as part of the effective implementation of their workplace mental health programmes.

#### **Benchmark findings**

In total, 4% of the companies assessed (5% in 2023) report on the proportion of line managers trained in workplace mental health, and 8% (11% in 2023) report on the proportion of dedicated individuals (typically mental health first aiders) who receive such training. These reported figures are lower than those for the numbers of companies that publish details on the provision of mental health training to line managers and dedicated individuals (24% and 28%, respectively; see Question 14). Rather than indicating a lack of performance monitoring of training provision, this disparity could simply reflect the fact that companies have only been expected to report this data relatively recently.

We anticipate that as businesses evolve their performance monitoring on workplace mental health, more of them will report quantitative performance data on training for line managers and dedicated individuals.

Here are two examples of companies reporting on the number of line managers or dedicated individuals trained in mental health.

#### Proportion of line managers trained

# Yes No 4% 96%

#### Saudi Arabian Oil

Region: EMEA

**G** Aramco launched its 'Supporting Well-Being for Leaders' course in 2022 to support the mental well-being of employees. Since its inception, it has been delivered to over 2,500 leaders in Aramco.

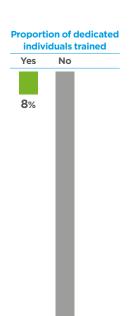
Saudi Arabian Oil, 'Sustainability report 2023'<sup>54</sup>

#### Philip Morris International

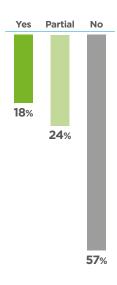
#### Region: North America

As of the end of 2023, over 200 employee volunteers had been trained as well-being champions. Moreover, more than 80 colleagues from our P&C [People & Culture] and Security & Market Safety functions received training to become trainers themselves.

Philip Morris International, 'Integrated report 2023'<sup>55</sup>



92%



Due to rounding, the percentages

do not total 100%

Q26. Does the company report on the uptake of its mental health programmes or initiatives?

The effective implementation of a mental health strategy relies on the active participation of employees in workplace initiatives and programmes. Companies should monitor and track employee uptake to help assess the impact of their mental health and wellbeing approach and to inform future priorities.

#### **Benchmark findings**

Of the companies assessed, 18% (15% in 2023) report on the uptake of multiple mental health initiatives or programmes, and 24% (28% in 2023) disclose limited data or partial reporting linked to a single initiative or programme. We hope that companies tracking this data will be able to use it to think strategically about their investment in mental health initiatives. Examples of uptake figures include the number of colleagues engaging with an EAP (employee assistance programme) and the number of webinar participants at online wellbeing seminars.

While 42% of companies report on the uptake of at least one mental health programme or initiative, this figure is significantly lower than the 78% of companies that conduct such initiatives (as evaluated in Question 15) and the 98% of companies that offer mental health support services (as evaluated in Question 16). We continue to encourage companies to monitor and report on the uptake of their various mental health programmes and initiatives.

Here is an example of a company reporting on the uptake of its mental health support services.

#### **Roche Holding**

Region: EMEA



**1** 92,563 employees completed the eLearning designed to enhance understanding of employee (mental) health and wellbeing. ...

CareRing is a global internal community for Roche employees who are patients or caregivers. ... It has more than 1,600 members. ...

We offer regular workshops on the topic of psychological safety, with 1,676 participants in 2023. ...

At Roche, every employee is entitled to free sessions with a professional coach. In 2023, 2,078 employees reaped the benefits of this initiative, receiving expert guidance to boost their stress management and wellbeing.

Roche Holding, 'Mind matters: elevating employee mental health at Roche – mental health activities report  $2023'^{56}$ 

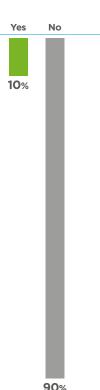
# Q27. Does the company use key performance indicator(s) to measure and report on the impact of its workplace mental health strategy?

Workplace mental health management is a complex matter and health data is sensitive. It is important, however, for companies to be able to develop appropriate performance metrics to measure the impact of their mental health strategies. The purpose of this question is not to be prescriptive about the metrics that should be adopted. Companies themselves are best placed to decide which qualitative and quantitative metrics are most relevant to their own workforce and strategies.

#### **Benchmark findings**

Our assessment found that only 10% of assessed companies (10% in 2023) report on mental health-related key performance indicators (KPIs). We encourage companies to evaluate the effectiveness of their workplace mental health programmes using appropriate performance metrics. We appreciate that companies need time to reach a level of confidence in the accuracy and reliability of their data before publishing. Companies typically undergo a process of refining the internal systems they use to capture and collate their metrics. In addition, the sensitive nature of some performance metrics may mean that companies choose not to report them publicly. The intention of this question is to highlight examples of company KPIs linked to mental health so that, over time, it will be possible to build a body of knowledge on the metrics companies use to measure workplace mental health effectively.

Here are two examples of companies developing metrics to measure the impact of their mental health strategies.





Taiwan Semiconductor Manufacturing Co, 'TSMC 2022 sustainability report'57

#### Toyota Motor



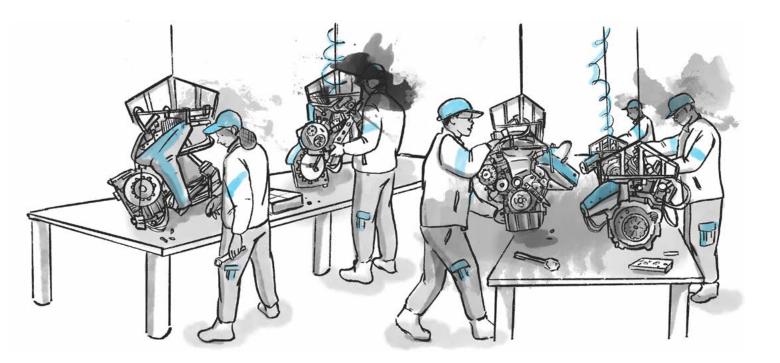
#### Region: Asia Pacific

#### Key KPIs

• Review KPIs to gain insight into mental and physical status of health ranging from improving healthy habits to reducing work absences

2023 (Toyota		2024 (Toyota			Motor Corporation)	1	
	2023 perspective					2024 perspective	
Employees on leave	Workforce of 801 employees or less	Ongoing	Employees on leave			Workforce of 801 employees or less	Lower incidences of absenteeism
(Physical)		New	Health	Physical	Health score 6 Average number of applicable cases within the six inspection criteria	4.37/6	Performance indicators
Persons on leave for lifestyle-related diseases	5% reduction compared to 2022	New	conditions	Mental	Percentage of people experiencing high levels of stress	18.9%	Health conditions
(Mental) Newly on leave	2% reduction compared to 2022	Ongoing	Healthy Healthy Lifestyle Challenge 8 habits (Average results from adopting 8 healthy lifestyle habits) Workplace Attitude towards creating healthy lifestyles environment Percentage of workplaces implementing plans systematically		6.4/8	Healthy habits	
Recurring absences	5% reduction compared to 2022	New			50%	Workplace environment	
(Healthy Lifestyle Challenge 8) (Average results from adopting 8 healthy lifestyle habits)	6.4/8	New	Health measures	(Pa	rticipation rate in company-wide plans> Walking events	20%	Process indicators Measures to promote healthy lifestyles

Toyota Motor, 'Sustainability data book, June 2024'<sup>58</sup>



### Chapter 4 About the benchmark

### Aims and objectives

The CCLA Corporate Mental Health Benchmark is designed to evaluate how listed companies approach and manage workplace mental health based on their published information. It provides institutional investors with an account of a company's management and associated disclosure practices on mental health, thereby acting as an important accountability mechanism for investors. Annual benchmark assessments allow stakeholders to track a company's absolute and relative progress over time.

The aims of the benchmark are to:

- ensure that corporate efforts are directed towards activities that positively support the mental health of people at work
- encourage greater disclosure on workplace mental health and enhance understanding of the business risks and opportunities presented by mental health among private sector employers
- equip investors and other stakeholders with a tool for assessing the effectiveness of corporate management of business risks and opportunities associated with mental health across global operations
- define important expectations on workplace mental health, thereby providing investors with an accessible way to understand and evaluate corporate practices.

#### Governance

The CCLA Corporate Mental Health Benchmark has been developed with the support of external experts. Chronos Sustainability, a specialist sustainability advisory firm with expertise in benchmark initiatives, is responsible for advising CCLA on the design and development of the benchmark, for conducting the independent company assessments and for analysing the findings from the data. An Expert Advisory Panel, comprising independent workplace mental health experts and specialist practitioners, supports CCLA and Chronos Sustainability on the development of the benchmark. The panel comprises:

- Elizabeth Sheldon, CCLA (co-chair)
- Lord Dennis Stevenson CBE (co-chair)
- Dr Richard Caddis, Rolls-Royce
- Paul Farmer CBE, Age UK
- Remi Fernandez, Principles for Responsible Investment
- Dr Sarah Hughes, Mind
- Dr Shekhar Saxena, Harvard T.H. Chan School of Public Health
- Dr Junko Umihara, Showa Women's University

The panel is responsible for:

- ensuring that the benchmark including its assessment criteria and scoring methodology – is credible, robust and based on the best available knowledge
- providing independent technical guidance on workplace mental health
- reviewing the positioning of the benchmark's overall findings
- supporting the effective dissemination of the benchmark's findings
- guiding the refinement of the benchmark's criteria and scoring for future iterations.

#### Evolution

#### Genesis

CCLA's mental health engagement programme was launched in February 2019. A set of ambitious but workable 'best practice' measures were created, inspired by the recommendations set out by the UK government-commissioned 'Thriving at work' review<sup>59</sup> and the input of senior representatives from Public Health England, the mental health charity Mind and other leading thinkers on the issue. The five measures were:

- Establish a mental health at work plan that outlines the approach to improving and protecting the mental health of employees and regular contractors.
- 2 Promote mental health awareness among employees and clearly signpost the support provided.
- 3 Integrate mental health safeguarding into a) job design and b) workplace conditions.
- 4 Train managers to recognise mental health issues.
- 5 Monitor and report on employee mental health and wellbeing.

These measures were put to a select group of CCLA's investee companies, which together had a workforce of approximately 400,000 people. While some businesses had gone above and beyond the legislated minimum standards, others had made little or no progress. At the time, CCLA was advised that it was the only investor asking questions of companies about mental health.

Covid-19 gave the engagement programme a new impetus and, in April 2020, CCLA formed a coalition of investors representing £2.2 trillion (\$2.9 trillion) in assets under management. We wrote on their behalf to the CEO of every FTSE 100 company. The letter urged these business leaders to protect the mental health of their employees during the pandemic.

Seventy-four companies replied, and there were wide disparities in the quality of the responses we received. Despite evidence of some good practice, there were few signs of a strategic, structured focus on mental health. This was in sharp contrast to companies' management approaches to safeguarding employee physical health and safety.

From these engagements, it became apparent that improvements in corporate practice were required, alongside greater transparency, more disclosure and more comprehensive reporting on mental health. These findings led us to explore the development of a corporate benchmark as a tool for defining the expectations of companies in this space.

#### Consultation and academic review

In December 2020, CCLA launched a public consultation on a proposed corporate mental health benchmark. The consultation document outlined a management systems framework designed to ensure that the benchmark paid particular attention to the internal governance conditions necessary to change and shape corporate actions on mental health in the workplace. We received written responses to the consultation from 74 (primarily European) stakeholders including investors, companies, academics and civil society organisations.

In developing the benchmark, we mapped 27 key reference sources (see Chapter 5, on alignment with international and other frameworks and norms) and used them to create a set of 30 distinct assessment criteria.

# 'Road test', pilot and inaugural benchmark

In June 2021, we began testing the first iteration of the CCLA Corporate Mental Health Benchmark. Thirty assessment criteria were road-tested on the published information of six UK companies. In July 2021, the findings were shared with the Expert Advisory Panel, resulting in some minor modifications to the assessment criteria.

In August and September 2021, we conducted a pilot assessment of 30 UKlisted companies based on their market capitalisation (as at 31 August 2021) and the size of their workforce (more than 15,000 employees). These companies represented a combined workforce of more than 3 million employees.

The pilot benchmark was published on 22 December 2021 as an anonymised ranking, with companies also receiving confidential reports of their individual scores and bespoke recommendations. The 2021 pilot benchmark report is available on the CCLA website.<sup>60</sup>

The assessment criteria and scoring were further refined in consultation with the Expert Advisory Panel. The changes were designed to provide more granularity in the data output and to eliminate the risk of double counting. As a result, three criteria were removed and minor refinements were made to two of the criteria. The 2022 benchmark assessment criteria were then published on the CCLA website.<sup>61</sup>

Prior to the assessment period, CCLA wrote to the 100 UK companies and the 100 global companies in the scope of the 2022 CCLA Corporate Mental Health Benchmarks to inform them of their inclusion and to share the benchmark assessment criteria and programme timeline.

The first UK 100 benchmark report was published in June 2022.62

The first Global 100 benchmark report was published in October 2022.<sup>63</sup>

#### Second annual benchmark

In November 2022, the Expert Advisory Panel agreed to make some minor modifications to the criteria wording and the scoring ahead of the 2023 assessments. The changes and the reasons for making them are detailed in the 2023 benchmark assessment criteria, published on the CCLA website in February 2023.<sup>64</sup> As a result of these adjustments, the overall maximum score available reduced from 222 points in 2022 to 212 points in 2023.

Following the publication of the updated criteria, CCLA notified all companies of their inclusion in the 2023 benchmarks and shared the benchmark assessment criteria and programme timeline.

The second annual UK 100 benchmark report was published in June 2023.65

The second annual Global 100+ benchmark report (now assessing 110 companies) was published in October 2023.<sup>66</sup>

#### Third annual benchmark

In September 2023, the Expert Advisory Panel approved some minor revisions to the benchmark assessment criteria, including adjustments to align the methodology more closely with the recommendations in a policy brief published by the World Health Organization (WHO) and the International Labour Organization (ILO) on the WHO guidelines on mental health at work.<sup>67</sup> Further details of the gap analysis undertaken between the CCLA Corporate Mental Health Benchmark criteria and the recommendations in the WHO and ILO policy brief are available in the 2023 Global 100+ benchmark report.<sup>68</sup> The criteria updates resulted in an additional five points being made available so that the overall maximum possible score increased from 212 points in 2023 to 217 points in 2024. (See Appendix 1 for a breakdown of the scoring system.)

The revised 2024 benchmark assessment criteria were published on the CCLA website in January 2024.<sup>69</sup> CCLA subsequently notified companies of their inclusion in the 2024 benchmarks, flagged the updated methodology and set out the assessment timeline for the year.

The third annual UK 100 benchmark report was published in June 2024.<sup>70</sup>

# Assessment process for the 2024 Global 100+ benchmark

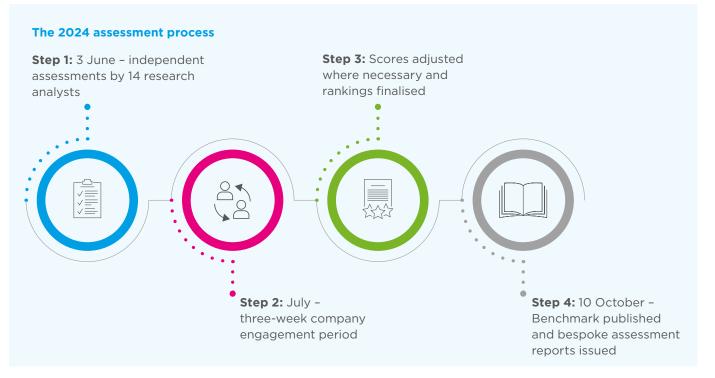
Between 3 June and 3 July 2024, the 119 companies in the 2024 Global 100+ benchmark were independently assessed by a team of 14 research analysts and quality reviewers who had been trained in the benchmark methodology and scoring approach.

The focus of the evaluation was on each corporate entity rather than any subsidiary companies. The assessment aim – mirroring investors' interests – was to evaluate how companies are managing workplace mental health across group operations. Where corporate data were not readily available, scores were awarded to companies managing workplace mental health within specific markets or subsidiaries for certain questions. The assessment involved a review of the material available at the time of the assessment on companies' corporate websites, in their annual and sustainability reports and other relevant publications, in press releases available via their corporate websites, and on social media. Scoring was not given for information that was:

- published more than two years ago (except in the case of a policy statement or equivalent)
- published after the date of the assessment period
- published through third-party sources
- available only in a company's private domain.

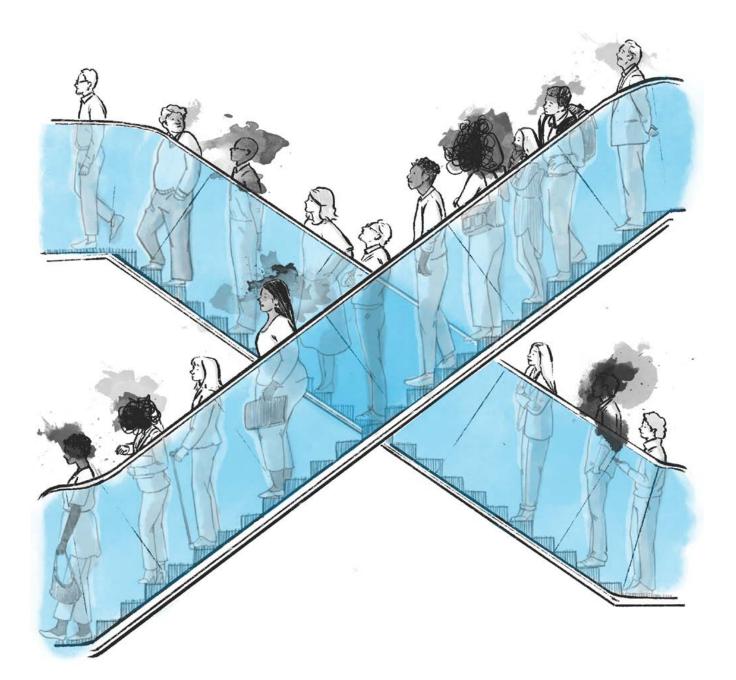
The reason for these exclusions is that the core objective of the benchmark is to encourage companies to provide a transparent and accurate account of their current approach to workplace mental health. Between 3 July and 23 July 2024, the companies were invited to review and comment on their preliminary assessment via an online portal and to highlight any evidence that had been overlooked or misinterpreted during the assessment phase. In total, 26 companies provided feedback on their preliminary assessment. Subsequently, the scores of 18 companies were revised before the scoring was finalised.

In September 2024, the Expert Advisory Panel convened to review the findings of the 119 global company assessments. The panel was also invited to review the draft benchmark report prior to its publication on 10 October 2024. On the date of publication, each company was sent its bespoke assessment report.



## Chapter 5 Alignment with international frameworks and norms

At the outset of the project and in developing the initial benchmark criteria, we compared and mapped relevant reference sources. Following the publication of the World Health Organization's (WHO) guidelines on mental health at work and the accompanying joint WHO and International Labour Organization (ILO) policy brief in 2022, we conducted a detailed gap analysis.<sup>71</sup> This involved comparing the WHO and ILO policy brief with the CCLA Corporate Mental Health Benchmark criteria. Encouragingly, we found good alignment between the two standards (as explained in Chapter 6 of the 2023 Global 100+ report).<sup>72</sup> The analysis resulted in some minor modifications to the assessment criteria ahead of the 2024 benchmark iteration, as detailed in the 2024 benchmark assessment criteria.<sup>73</sup>



The Corporate Mental Health Benchmark assessment criteria have been developed using the following reference sources and frameworks. Designations are for illustrative purposes only and are based on the geographic focus of the frameworks and reports rather than the geographic reach of the institutions cited:



#### International

- 'Advancing duty of care and healthy workplaces: handbook for non-governmental organisations (NGOs)', Global Centre for Healthy Workplaces and Cigna Foundation<sup>74</sup>
- Business Group on Health (various resources)75
- 'ISO 45003:2021(en): occupational health and safety management psychological health and safety at work guidelines for managing psychosocial risks', ISO<sup>76</sup>
- 'The leadership pledge pack', Global Business Collaboration for Better Workplace Mental Health<sup>77</sup>
- 'Mental health at work: policy brief', WHO and ILO<sup>78</sup>
- 'Mental health first aiders: workplace considerations', Institution of Occupational Safety and Health  $^{\rm 79}$
- 'Mental health in the workplace: benchmarking questions', Institution of Occupational Safety and Health<sup>80</sup>
- 'Thriving at Work Global Framework', City Mental Health Alliance<sup>81</sup>
- 'WHO Healthy Workplace Framework and Model: background and supporting literature and practices', WHO<sup>82</sup>
- 'WHO guidelines on mental health at work', WHO<sup>83</sup>



#### National

- 'Added value: mental health as a workplace asset', Unum and Mental Health Foundation<sup>84</sup>
- Canadian Centre for Occupational Health and Safety (various resources)<sup>85</sup>
- 'DIY mental health: survey finds employers taking action to improve access to care', Mercer  $^{\rm 86}$
- 'Health challenges in South African automotive companies: wellness in the workplace', Anna Meyer-Weitz, Friederike Baasner-Weihs and Martin Weihs<sup>87</sup>
- 'Managing mental health in the workplace 2019', XpertHR<sup>88</sup>
- 'Mental health at work 2018 report: seizing the momentum', Business in the Community and Mercer<sup>89</sup>
- 'Mental health in maritime network', Maritime UK<sup>90</sup>
- 'People managers' guide to mental health', Chartered Institute of Personnel and Development and Mind<sup>91</sup>
- SafeWork NSW (various resources)<sup>92</sup>
- 'Seven domains of wellbeing', Chartered Institute of Personnel and Development<sup>93</sup>
- 'Ten step toolkit for employers', Leeds Mindful Employer Network<sup>94</sup>
- 'Embrace wellbeing' (information on the KeepWell mark), Ibec<sup>95</sup>
- 'Thriving at work', Dennis Stevenson and Paul Farmer<sup>96</sup>



#### Regional

- 'EU-Compass for Action on Mental Health and Well-being', European Commission<sup>97</sup>
- 'Health, work and wellbeing', Institute for Employment Studies<sup>98</sup>
- 'OECD Mental Health Performance Framework', Organisation for Economic Co-operation and Development<sup>99</sup>
- 'Workplace Wellbeing Index', Mind<sup>100</sup>

We are committed to ensuring that the CCLA Corporate Mental Health Benchmark remains relevant and aligned to the latest international frameworks and norms.

## Chapter 6 A vision for company and investor action

We believe that investors have an important role to play in supporting and encouraging companies to improve their approach to workplace mental health. Protecting and promoting good workplace mental health is a business imperative, relevant not only to a company's duty of care to its employees but also to its bottom line. It is potentially material to long-term value creation and a relevant consideration for investors forming views on companies and sectors across global capital markets.

## Commitment and engagement

Acting on mental ill-health in the workplace will benefit investors, business and society. We call on the companies in this Global 100+ benchmark to consider the business risks and opportunities associated with mental health. We ask that business performance is optimised through the elimination of avoidable costs associated with mental ill-health, as well as efforts to create the working conditions under which every individual can thrive.

We encourage companies to develop and implement effective management systems and processes on workplace mental health by:

- acknowledging workplace mental health as an important consideration for the business and for employees
- signalling that board and senior management will promote mental health in the workplace, recognise the link between mental health and 'good work' principles, and encourage a culture of openness on mental health
- publishing a commitment to workplace mental health in a policy statement (or equivalent) together with a description of the scope of this commitment and of the governance and management processes in place to ensure the policy is effectively implemented and monitored

- setting objectives and targets to improve workplace mental health
- reporting annually on progress against the company's mental health policy and objectives.

We hope that investors will use the findings of the 2024 CCLA Corporate Mental Health Benchmark to inform their investment decision-making and to guide their engagement efforts on mental health with investee companies.

## Looking ahead

As investors, we believe that workplace mental health is potentially material to longterm value creation. This benchmark is an essential step towards a better understanding of the relative performance of companies on workplace mental health. It offers a clear framework around which businesses can structure their management and disclosures, and it provides investors with an objective evaluation and engagement tool.

We will:

 Repeat the UK 100 and Global 100+ Corporate Mental Health Benchmarks in 2025

We will conduct the fourth iteration of the UK 100 and Global 100+ benchmarks in 2025. We expect to cover similar scopes of companies and broadly use the same methodology as in 2024 to allow for yearon-year comparison.

We will write to all companies in early 2025 to confirm their inclusion in the 2025 benchmark cycle. We will share with them the benchmark criteria and the timeline for the company assessments and publication of the report. 2. Continue to build investor support for the global investor statement on workplace mental health

In June 2022, we started to build support for the global investor statement on workplace <u>mental health</u>. The statement outlines what investors expect of companies to ensure that business performance is optimised, through both a healthy and productive workforce and the elimination of unnecessary costs associated with poor mental health. It calls on investors to encourage companies to develop and implement effective management systems and processes on workplace mental health, and to report annually on their workplace mental health strategies and performance.

We will continue to build this coalition.

## Appendix 1 2024 benchmark assessment criteria

The criteria against which we assess each company are set out below. Each company is assessed based on information that is publicly available at the time of the assessment. Full details about each question – the rationale, scoring and explanatory notes – are available on the CCLA website.<sup>101</sup>

#### **CCLA Corporate Mental Health Benchmark assessment**

Section	Maximum achievable score	Weighting (%)*
Management commitment and policy	68	31
Governance and management	77	35
Leadership and innovation	22	10
Performance reporting and impact	50	23
Total score	217	99

\* Due to rounding, the percentages do not total 100%.

#### **Management commitment and policy**

Question	Criterion	Maximum achievable score
Q1	Does the company acknowledge workplace mental health as an important concern for the business?	10 points
Q2	Is there a statement from the CEO signalling the company's leadership commitment to workplace mental health?	10 points
Q3	Does the company publish an overarching corporate mental health policy (or equivalent)?	10 points
Q4	a) Does the policy statement (or equivalent) provide a clear explanation of worker scope? b) Does the policy statement (or equivalent) provide a clear explanation of geographical and business area scope?	10 points
Q5	Does the company have a clear management commitment to encouraging a culture of openness on mental health?	10 points
Q6	Does the company support the principles of good work by having a formal commitment to diversity, equity and inclusion (DEI)?	3 points
Q7	Does the company support the principles of good work by having a formal commitment to fair pay and financial wellbeing?	3 points
Q8	Does the company support the principles of good work by having a formal position on board-employee information and consultation?	3 points
Q9	Does the company support the principles of good work by having a formal position on flexible working?	3 points
Q10	Does the company support the principles of good work by having a formal position on career progression and job adjustment?	3 points
Q11	Does the company support the principles of good work by having a formal position on anti-bullying and non-harassment, or equivalent?	3 points

### Governance and management

Question	Criterion	Maximum achievable score
Q12	a) Has the company assigned board or senior management responsibility for workplace mental health? b) Has the company assigned day-to-day operational management responsibility for workplace mental health?	10 points
Q13	Has the company set objectives or targets for the management of mental health in the workplace?	10 points
Q14	<ul> <li>a) Does the company provide mental health training to line managers?</li> <li>b) Does the company provide mental health training to dedicated individuals (e.g. mental health first aiders)?</li> </ul>	10 points
Q15	<ul><li>a) Has the company developed formal initiatives or programmes to raise awareness of mental health in the workplace?</li><li>b) Has the company developed formal initiatives or programmes to raise awareness of mental health in the workplace that extend beyond employees and contingent workers (e.g. to customers and/or suppliers)?</li></ul>	7 points
Q16	Does the company provide access to mental health services and support either internally or externally?	5 points
Q17	Does the company encourage openness about mental health and offer appropriate workplace adjustments to workers who require them throughout their career life cycle (e.g. during recruitment, on-boarding, career development, performance reviews and return to work)?	5 points
Q18	<ul><li>a) Are employees given the opportunity to directly contribute to the design or development of workplace mental health initiatives?</li><li>b) Does the company adapt mental health programmes to local contexts?</li></ul>	10 points
Q19	Does the company have formal processes for measuring employee engagement (e.g. confidential pulse survey, engagement panel) and does this information support workplace mental health measurement and initiatives?	10 points
Q20	Does the company independently assure its mental health management system against a recognised framework or standard?	10 points

### Leadership and innovation

Question	Criterion	Maximum achievable score
Q21	<ul> <li>a) Does the company participate in industry or academic initiatives or partnerships aimed at promoting positive workplace mental health?</li> <li>b) Does the company engage customers and/or suppliers in initiatives or programmes aimed at promoting positive mental health?</li> </ul>	12 points
Q22	Does the company provide examples of employee communications on workplace mental health?	10 points

### Performance reporting and impact

Question	Criterion	Maximum achievable score
Q23	Does the company publish details of its mental health approach in its annual report and accounts (or equivalent)?	10 points
Q24	Does the company report on progress against its objectives or targets related to mental health?	10 points
Q25	<ul><li>a) Does the company report on the proportion of line managers that are trained in workplace mental health?</li><li>b) Does the company report on the proportion of dedicated individuals that are trained in workplace mental health?</li></ul>	10 points
Q26	Does the company report on the uptake of its mental health programmes or initiatives?	10 points
Q27	Does the company use key performance indicator(s) to measure and report on the impact of its workplace mental health strategy?	10 points

## Appendix 2

# List of global companies covered by the 2024 benchmark

The global companies covered by the benchmark were selected in January 2024. They were chosen based on a specific set of considerations, covering market capitalisation, workforce size and previous inclusion in the benchmark. One company, Unilever, was removed from the global benchmark as we decided to assess it in the UK benchmark only for 2024. Ten companies are included in the Global 100+ benchmark for the first time: American Express Co, Anheuser-Busch InBev, Commonwealth Bank of Australia, HDFC Bank, Industria de Diseño Textil, PDD Holdings, S&P Global, Sanofi, ServiceNow and Uber Technologies.

Company name	Market capitalisation (\$ million)	Number of employees	Country of domicile	Global Industry Classification Standard (GICS) sector
Abbott Laboratories	196,018	115,000	United States	Health care
AbbVie	288,471	50,000	United States	Health care
Accenture	229,628	743,000	Ireland	Information technology
Adobe	267,757	29,945	United States	Information technology
Advanced Micro Devices	233,278	25,000	United States	Information technology
Agricultural Bank of China	174,228	444,932	China	Financials
AIA Group	91,621	25,405	Hong Kong	Financials
Alibaba Group Holding	184,378	224,955	China	Consumer discretionary
Alphabet	1,781,063	182,381	United States	Communication services
Amazon.com	1,591,957	1,500,000	United States	Consumer discretionary
American Express Co	132,960	77,300	United States	Financials
Amgen	160,880	25,200	United States	Health care
Anheuser-Busch InBev	130,477	166,632	Belgium	Consumer staples
Apple	2,866,061	100,000	United States	Information technology
ASML Holding	286,589	42,266	Netherlands	Information technology
AstraZeneca	213,964	83,500	United Kingdom	Health care
AT&T	118,798	152,740	United States	Communication services
Bank of America	260,124	213,000	United States	Financials
Bank of China	148,356	304,245	China	Financials
Berkshire Hathaway	788,658	382,651	United States	Financials
BHP Group	161,348	83,211	Australia	Materials
Boeing	135,872	156,000	United States	Industrials
Bristol Myers Squibb	102,043	34,300	United States	Health care
Broadcom	503,808	20,000	United States	Information technology
Caterpillar	147,385	109,100	United States	Industrials
Charles Schwab	118,340	35,900	United States	Financials
Chevron	275,026	43,846	United States	Energy
China Construction Bank	148,298	371,645	China	Financials
China Life Insurance Co	83,762	100,790	China	Financials
China Merchants Bank	97,054	111,819	China	Financials
Cisco Systems	204,007	84,900	United States	Information technology
Coca-Cola Co	258,519	82,500	United States	Consumer staples
Comcast	172,917	186,000	United States	Communication services
Commonwealth Bank of Australia	126,662	49,454	Australia	Financials

Company name	Market capitalisation (\$ million)	Number of employees	Country of domicile	Global Industry Classification Standard (GICS) sector
Contemporary Amperex Technology Co	95,007	118,914	China	Industrials
Costco Wholesale	296,708	316,000	United States	Consumer staples
CVS Health	101,536	219,000	United States	Health care
Danaher	167,493	79,000	United States	Health care
Deere & Co	109,258	82,956	United States	Industrials
Eli Lilly and Co	598,965	34,657	United States	Health care
Exxon Mobil	396,607	62,000	United States	Energy
Goldman Sachs Group	126,877	45,900	United States	Financials
HDFC Bank	150,697	197,899	India	Financials
Hermès International	212,555	20,607	France	Consumer discretionary
Home Depot	352,731	471,600	United States	Consumer discretionary
Honeywell International	131,619	97,000	United States	Industrials
HSBC Holdings	149,499	221,275	United Kingdom	Financials
Industria de Diseño Textil	130,902	154,519	Spain	Consumer discretionary
Industrial and Commercial Bank of China	220,631	415,719	China	Financials
Intel	197,646	120,300	United States	Information technology
International Business Machines	146,784	288,300	United States	Information technology
Intuit	168,647	18,200	United States	Information technology
Johnson & Johnson	387,548	152,700	United States	Health care
JPMorgan Chase & Co	487,944	308,669	United States	Financials
Kweichow Moutai Co	288,543	31,413	China	Consumer staples
Linde	195,435	65,010	United States	Materials
L'Oréal	257,707	87,369	France	Consumer staples
Lowe's Companies	125,711	182,000	United States	Consumer discretionary
LVMH Moet Hennessy Louis Vuitton	369,880	196,000	France	Consumer discretionary
Mastercard	399,952	29,900	United States	Financials
McDonald's	211.038	150,000	United States	Consumer discretionary
Medtronic	115,507	95.000	Ireland	Health care
Meituan	60,379	99,345	China	Consumer discretionary
Merck & Co	299,293	67,000	United States	Health care
Meta Platforms	935,019	66,185	United States	Communication services
Microsoft	2,830,280	221,000	United States	Information technology
Morgan Stanley	147,472	80.710	United States	Financials
Nestlé	302,394	275,000	Switzerland	Consumer staples
Netflix	213,588	12,800	United States	Communication services
NextEra Energy	122,900	9,300	United States	Utilities
Nike	157,467	83,700	United States	Consumer discretionary
Novartis	243,363	101,703	Switzerland	Health care
Novo Nordisk	482,845	61,412	Denmark	Health care
NVIDIA	1,326,847	26,196	United States	Information technology
Oracle	285,558	164,000	United States	Information technology
PayPal Holdings	65,217	29,900	United States	Financials
PDD Holdings	199,288	12,992	Ireland	Consumer discretionary
	199,200	12,332	neidilu	consumer discretionary

Company name	Market capitalisation (\$ million)	Number of employees	Country of domicile	Global Industry Classification Standard (GICS) sector
PepsiCo	227,128	315,000	United States	Consumer staples
PetroChina Co	177,452	386,912	China	Energy
Pfizer	160,471	83,000	United States	Health care
Philip Morris International	146,237	79,800	United States	Consumer staples
Ping An Insurance Group Co of China	88,751	344,223	China	Financials
Procter & Gamble	352,237	107,000	United States	Consumer staples
Prosus	78,114	22,643	Netherlands	Consumer discretionary
Qualcomm	151,891	50,000	United States	Information technology
Reliance Industries	221,499	389,414	India	Energy
Roche Holding	239,911	103,613	Switzerland	Health care
Royal Bank of Canada	138,650	91,398	Canada	Financials
RTX	122,581	182,000	United States	Industrials
S&P Global	136,576	39,950	United States	Financials
Salesforce	259,560	70,843	United States	Information technology
Samsung Electronics	331,310	84,462	South Korea	Information technology
Sanofi	131,595	91,753	France	Health care
SAP	191,109	106,495	Germany	Information technology
Saudi Arabian Oil	2,119,807	70,496	Saudi Arabia	Energy
ServiceNow	148,117	21,103	United States	Information technology
Shell	202,451	87,000	United Kingdom	Energy
Siemens	140,589	320,000	Germany	Industrials
Sony Group	123,911	113,000	Japan	Consumer discretionary
Taiwan Semiconductor Manufacturing Co	488,686	73,090	Taiwan	Information technology
Tata Consultancy Services	164,522	608,985	India	Information technology
Tencent Holdings	348,582	105,309	China	Communication services
Tesla	719,072	127,855	United States	Consumer discretionary
Texas Instruments	150,553	33,000	United States	Information technology
Thermo Fisher Scientific	209,707	130,000	United States	Health care
T-Mobile US	188,020	71,000	United States	Communication services
Toronto-Dominion Bank	107,956	103,257	Canada	Financials
TotalEnergies	157,457	101,279	France	Energy
Toyota Motor	317,894	381,576	Japan	Consumer discretionary
Uber Technologies	128,081	32,200	United States	Industrials
Union Pacific	143,304	30,717	United States	Industrials
United Parcel Service	135,652	536,000	United States	Industrials
UnitedHealth Group	496,777	400,000	United States	Health care
Verizon Communications	162,068	110,500	United States	Communication services
Visa	541,427	28,800	United States	Financials
Volkswagen	65,441	650,951	Germany	Consumer discretionary
Walmart	431,861	2,100,000	United States	Consumer staples
Walt Disney Co	162,495	225,000	United States	Communication services
Wells Fargo & Co	176,243	227,363	United States	Financials
	38,131,386	21,167,754		

Data sources: Sustainalytics and Bloomberg, January 2024.

## Appendix 3 Recommended reading

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World Health Organization (2022), 'WHO guidelines on mental health at work', online at <u>https://iris.who.int/bitstream/handle/</u> 10665/363177/9789240053052-eng.pdf

World Health Organization and International Labour Organization (2022), 'Mental health at work: policy brief', online at <u>https://iris.who.int/bitstream/handle/</u> 10665/362983/9789240057944-eng.pdf

### **Corporate commitments**

MindForward Alliance Leadership Pledge, online at <u>https://betterworkplacemh.com/</u> sign-the-leadership-pledge

Mental Health at Work Commitment, online at <u>www.mind.org.uk/news-campaigns/</u> <u>campaigns/mental-health-at-work-</u> <u>commitment</u>

## Glossary

#### Absenteeism

Absenteeism is absence from work that extends beyond what would be considered ordinary and reasonable. Ordinary and reasonable time off might include holiday, personal time or occasional illness. Companies expect their employees to miss some work each year for legitimate reasons, but absenteeism means sustained periods of unplanned absence.

#### **Good work**

We recognise that employment can have a positive impact on an individual's mental health and that 'good work' is good for mental health. 'Good work' can help prevent new mental health problems and support those with existing conditions to get on in work and thrive.<sup>102</sup> The benchmark recognises the components of 'good work' to be diversity, equity and inclusion; flexible working; fair pay and financial wellbeing; board-employee information and consultation; career progression and job adjustment; and the absence of harassment and bullying in the workplace.

#### **Healthy workplace**

Definitions of a 'healthy workplace' have evolved over the past decades, from an almost exclusive focus on the physical work environment (traditional occupational health and safety, dealing with physical, chemical, biological and ergonomic hazards) to a much broader definition that includes lifestyle and psychosocial factors as well.

According to the World Health Organization: 'A healthy workplace is one in which workers and managers collaborate to use a continual improvement process to protect and promote the health, safety and well-being of all workers and the sustainability of the workplace by considering the following, based on identified needs:

- health and safety concerns in the physical work environment;
- health, safety and well-being concerns in the psychosocial work environment including organization of work and workplace culture;

- personal health resources in the workplace; and
- ways of participating in the community to improve the health of workers, their families and other members of the community.'<sup>103</sup>

#### **Mental health**

Mental health is not the same as 'mental ill-health'. It is a continuum that includes emotional wellbeing, mental health conditions and mental illness. We all have mental health, just as we all have physical health. The World Health Organization defines mental health as 'a state of mental well-being that enables people to cope with the stresses of life, realize their abilities, learn well and work well, and contribute to their community'.<sup>104</sup> 'Poor mental health' or 'mental ill-health' includes the full spectrum from common mental health conditions. such as anxiety and depression, to more severe illnesses, such as bipolar disorder and schizophrenia.

#### Mental health at work

'Mental health at work' includes not only mental health problems that have been caused by work but also those that are brought to and experienced in the workplace.<sup>105</sup>

#### Neurodiversity

Neurodiversity is not regarded as a mental health issue but as a disability issue. The word 'neurodiversity' refers to the diversity among all people but is often more specifically used in the context of autism spectrum disorder (ASD) and other neurological and developmental conditions, such as attention deficit hyperactivity disorder (ADHD) and learning disabilities. Stigma, a lack of awareness and a lack of appropriate infrastructure (e.g. as might be found in a traditional office setup or staffing structure) can lead to the exclusion of people with neurodevelopmental differences. Understanding and embracing neurodiversity in communities, schools, healthcare settings and workplaces can improve inclusivity for everyone.<sup>106</sup>

#### Presenteeism

Presenteeism is the lost productivity that occurs when employees are not fully functioning in the workplace because of an illness, injury or other condition. Presenteeism is associated with increases in reported common mental health conditions and stress-related absence, which are among the top causes of long-term sickness absence.

#### Wellbeing

'Wellbeing' is a broad concept. According to the UK Care Act 2014, it particularly relates to the following areas:

- 'personal dignity (including treatment of the individual with respect);
- physical and mental health and emotional well-being;
- protection from abuse and neglect;
- control by the individual over their day-to-day life (including over care and support ... and the way in which [support] is provided);
- participation in work, education, training or recreation;
- social and economic well-being;

- domestic, family and personal relationships;
- suitability of living accommodation;
- the individual's contribution to society'.<sup>107</sup>

There is no hierarchy in the areas of wellbeing listed above – all are equally important. There is also no single definition of wellbeing – how this is interpreted will depend on people's circumstances and priorities.

#### Workplace wellbeing

'Workplace wellbeing' relates to all aspects of working life, from the quality and safety of the physical environment to how workers feel about their work, their working environment, the climate at work and how their work is organised.<sup>108</sup>

#### **Work-related stress**

Work-related stress is a response people may have when presented with work demands and pressures that are not matched to their knowledge and abilities and that challenge their ability to cope. Stress occurs in a wide range of work circumstances but is often made worse when employees feel they have little support from supervisors and colleagues, or little control over work processes.

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Please contact:

#### **Amy Browne**

Director of Stewardship and Deputy Head of Sustainability amy.browne@ccla.co.uk +44 20 7489 6030

