



Open Call for Input regarding the Working Group's Report on the Gender Lens to the UN Guiding Principles on Business and Human Rights

Dear Sir / Madam,

This response provides guidance on questions 5 and 7 of the Open Call for Input which asks whether States and businesses have applied a gender lens in a business context.

Governments can play a vital role in promoting inclusive economic growth and gender equality through focused legislation and policies implemented at the public and private sector level. Similarly, companies can contribute through implementing policies to diversify their workforce to incorporate more women at all company levels. Although there does not appear to be a uniform approach across all countries on how to increase female participation and achieve gender equality, good practices implemented across the globe can form the basis of creating a comprehensive set of guidelines. Section I of this response offers insight into the good practices of exercising a gender perspective in the economic sector of States, section II of this response focuses on examples of how companies are adopting a gender lens when conducting due diligence, and section III looks at collaborative measures taken by governments and companies.

I. STATES' ECONOMIC SPHERE

States and intergovernmental organisations have applied a gender lens for a variety of initiatives, such as transparency measures, incentives, procurement policies and trade liberalisation. Examples of good practice in each category are highlighted below.

Transparency measures

Transparency measures are often used to shine a light on potential issues. Recognising that human rights may be at greater risk and women might face disproportionate impact in certain industries and operating contexts, the OECD has thus adopted sector specific risk management guidance for due diligence in the extractive, garment and footwear, and agriculture sectors. For example in the garment industry, women often operate in the informal sector and economy with low pay, hazardous working conditions, and few employment protections or benefits.¹ Within the large-scale commercial agriculture and extractive industry, women also often bear a disproportionate share of social, economic, and

¹ Bonita Meyersfeld, *Business, Human Rights and Gender: A Legal Approach to External and Internal Considerations*, pp. 203-204

environmental risks and costs. In many communities women are primarily responsible for providing food and water for their families and therefore, forced displacement as a result of mining or large-scale land investments disproportionately impacts women, particularly if the land they farm is polluted by land intensive industries.² These guidelines set out below represent examples of good practice where a gender lens has been applied.

- The OECD Due Diligence Guidance for Meaningful Stakeholder Engagement in the Extractive Sector ("Extractive Sector Guidelines")³ recognise that there are gender specific impacts and issues in the extractive sector and highlight the importance of applying a gender perspective throughout stakeholder engagement. The Extractive Sector Guidelines suggests that effective engagement with women involves understanding the context while ensuring that impacted women and their interlocutors are appropriately identified and prioritised.⁴
- The OECD-FAO Guidance for Responsible Agricultural Supply Chains ("Agricultural Guidance")⁵ recognises that women's rights and benefits should be considered at all stages of risk-based due diligence including identifying women as a vulnerable group to be protected during risk assessment and whose rights should be adequately represented during consultation processes.⁶
- The draft OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector ("Garment and Footwear Guidelines")⁷ establishes a common framework for supply chain due diligence in the garment and footwear sector. The Garment and Footwear Guidelines recommend that the position of women should be systematically considered at all stages of risk-based human rights due diligence⁸. The Garment and Footwear Guidelines also give further specific guidance on how to address sexual harassment, gender-based violence and women's restrictions to trade unions.⁹

These examples are a good start and show that when an organisation considers the impact on women, there are measures that can be taken to lessen the impact is lessened. We would encourage the OECD and others to look at other sectors to identify where women could be affected disproportionately and seek to mitigate these risks.

Another transparency measure is the "comply or explain" approach, whereby companies are expected to implement the requirements of a number of regulations and directives which encourage gender equality in a business-context, or alternatively provide an adequate explanation as to why they have not complied. The UK has enacted a number of these transparency measures, including:

² *Ibid.* p. 203

³ The OECD Due Diligence Guidance for Meaningful Stakeholder Engagement in the Extractive Sector, 2017 [hereinafter Extractive Sector Guidelines]; available at <http://www.oecd.org/publications/oecd-due-diligence-guidance-for-meaningful-stakeholder-engagement-in-the-extractive-sector-9789264252462-en.htm>

⁴ *Ibid.* pp. 100 - 103

⁵ OECD-FAO Guidance for Responsible Agricultural Supply Chains, 2016 [hereinafter Agriculture Guidance]; available at <http://mneguidelines.oecd.org/OECD-FAO-Guidance.pdf>

⁶ *Ibid.* p. 37

⁷ OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector, Draft version for public consultation purposes, 2017, [hereinafter Garment and Footwear Guidelines]; available at <https://mneguidelines.oecd.org/oecd-due-diligence-guidance-garment-footwear.pdf>

⁸ *Ibid.* p. 10

⁹ *Ibid.* Module 2.

- The UK Equality Act 2010 (Gender Pay Gap Information) Regulations 2017 (the "Gender Pay Gap Regulations"), which requires employers of sizable businesses to publish their gender pay gap reports on their website.¹⁰ The report must include the mean and median average hourly pay by gender, the proportion of men and women in each salary quartile, the mean and median bonus pay in the last 12 months by gender, and the proportion of male and female employees who received a bonus in the same 12-month period. In April 2018, all UK companies with 250 employees or more were required to publish a gender pay gap report.¹¹ Over 10,000 employers published reports, and the vast majority identified a gender gap favouring men, with an overall gender pay gap of 18.4%.¹² The reports highlighted social issues by showing that the gap is larger among skilled trades occupations and the finance industry; that the gap widens with age; and that overall men earn more than women at the highest and lowest pay grades.¹³
- The Directive on Disclosure of Non-Financial and Diversity Information by Large Companies and Groups¹⁴ (the "Directive")¹⁵ pursuant to the UK Companies, Partnership and Groups (Accounts and Non-financial Reporting) Regulation No. 1245 (the "Reporting Regulations"). The Directive seeks to achieve consistent transparency in social and environmental reporting by mandating companies to disclose human rights due diligence, gender equality policies and environmental information. Importantly, the European Commission guidelines on the Directive point to the Sustainable Development Goals, and in particular to Goals 12 and 5 (sustainable consumption and gender equality) as two areas to which the Directive seeks to contribute by increasing company due diligence.¹⁶ The Reporting Regulations require companies with over 500 employees to disclose information on employees (including information on gender and diversity), as well as information on environmental matters.¹⁷

¹⁰ UK Equality Act 2010 (Gender Pay Gap Information) Regulations 2017; available at <https://www.legislation.gov.uk/ukdsi/2017/9780111152010>

¹¹ Requirement under the Gender Pay Gap Regulations, no. 172. The reports had to include the mean and median average hourly pay by gender, the proportion of men and women in each salary quartile, the mean and median bonus pay in the last 12 months by gender, and the proportion of male and female employees who received a bonus in the same 12 month period. See footnote 10 for the Gender Pay Gap Regulations.

¹² House of Commons Briefing Paper 'The Gender Pay Gap' 28 September 2018, p. 6; available at <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN07068#fullreport>

¹³ *Ibid.* pp. 9, 13, 21.

¹⁴ Directive 2014/95/EU of the European parliament and the Council of 22 October 2014 amending Directive 2013/34/EU as regards disclosure of non-financial and diversity information by certain large undertakings and groups; available at <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32014L0095&from=en>.

¹⁵ The Directive required every Member State to transpose the Directive into national legislation by 6 December 2016. Every Member State made it a requirement in their national laws for companies subject to the law to produce a diversity statement as well as publish the information required in the Directive. Most Member States also included penalties in the form of fines for companies who do not comply with the disclosure requirements.

¹⁶ European Commission Guidelines on non-financial reporting (methodology for reporting non-financial information)(2017/C 215/01), p. 2; available at [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52017XC0705\(01\)&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52017XC0705(01)&from=EN)

¹⁷ The Companies, Partnerships and Groups (Accounts and Non-Financial Reporting) Regulations 2016 No. 1245, amendment to section 414CB; available at http://www.legislation.gov.uk/uksi/2016/1245/pdfs/uksi_20161245_en.pdf

- In July 2018, the UK issued a new version of the Corporate Governance Code, (the "Code").¹⁸ As part of the Code's new requirements, directors are expected to take into consideration the diversity of their boards, the concerns of their stakeholders (in particular the work force) and increase reporting and transparency between investors and the company.¹⁹ The Code provides a good example of a holistic approach to applying the gender lens to corporate governance; companies will be required to consider gender, environmental and social considerations as a whole in their annual accounts and shareholder communications.

These reporting obligations can be seen as a good first step towards applying a gender lens in the economic sphere. However, in order for any reporting to be meaningful, these measures must be combined with other actions or initiatives, such as the ones described below. Further, there must be penalties for incomplete or inaccurate reporting. Therefore, we recommend transparency measures either alone or combined with other initiatives, but caution that they are of limited value and require enforcement mechanisms to be fully effective.

Incentive measures

An example of good practice in the EU of incentive measures is the implementation of Gender Equality Plans ("GEPs"). GEPs are initiatives aimed at defining the legal framework and analysing the necessary conditions for implementing gender mainstreaming in practice at the workplace. GEPs can either have legal force or simply refer to collective agreements. Austria, in particular, has embraced GEPs. Austria's Federal Ministry of Transport, Innovation and Technology has taken the opportunity to develop GEPs through a programme called "FEMtech Career" which offers incentives²⁰ for non-university research institutions in the field of science and engineering, aiming to increase the number of female scientists employed in industrial research and to improve their career opportunities.²¹ GEPs therefore serve to address gender biases in the workplace by providing opportunities for women to enter the workplace on equal footing to their male counterparts.

A further example of good practice in incentive measures can be seen through export agencies, such as the UK's Export Credit Agency ("UKEF"). UKEF's statutory function is to support UK exports by assuming financial risks, including repayments of export credit loans. In March 2016, UKEF published the UK Export Finance's Policy and Practice on Environmental, Social and Human Rights Due Diligence

¹⁸ Financial Reporting Council, The UK Corporate Governance Code 2018, July 2018; available at <https://www.frc.org.uk/getattachment/88bd8c45-50ea-4841-95b0-d2f4f48069a2/2018-UK-Corporate-Governance-Code-FINAL.PDF>. The Code will come into force on 1 January 2019 and will apply to all companies with a premium listing in the UK. The Code aims to establish a comprehensive framework for companies to promote the long-term sustainable success of the company.

¹⁹ *Ibid.* introduction, "a company's culture should promote integrity and openness, value diversity and be responsive to the views of shareholders and wider stakeholders"; Principle J "[appointments to the board] should promote diversity of gender, social and ethnic backgrounds, cognitive and personal strengths"; Principle D "meet [the company's] responsibilities to shareholders and stakeholders"; Principle E "ensure that workforce policies and practices are consistent with the company's values and support its long-term sustainable success. The workforce should be able to raise any matters of concern."; Principle M., "The board should establish formal and transparent policies and procedures [...] and satisfy itself on the integrity of financial and narrative statements." Available at <https://www.frc.org.uk/getattachment/88bd8c45-50ea-4841-95b0-d2f4f48069a2/2018-UK-Corporate-Governance-Code-FINAL.PDF>

²⁰ The incentives include providing companies with a refund between 50% and 70% of total costs for gender specific initiatives and providing funding to small and medium-sized enterprises ("SMEs") so they can carry out gender assessments within their company.

²¹ European Parliament, 'Gender Equality Plans in the private and public sectors in the European Union', Study for the FEMM Committee, 2017; available at [http://www.europa.europa.eu/RegData/etudes/STUD/2017/583139/IPOL_STU\(2017\)583139_EN.pdf](http://www.europa.europa.eu/RegData/etudes/STUD/2017/583139/IPOL_STU(2017)583139_EN.pdf)

and Monitoring ("UKEF Policy")²² which states that before providing support to export, it will identify the relevant environmental, social and human rights risks and carry out due diligence to ensure that projects are in compliance with applicable local laws and international environmental, social and human rights standards. Although the UKEF Policy does not specifically set out gender aspects of environmental, social and human rights due diligence, certain gender aspects are already incorporated within the broad concept of environmental, social and human rights risks and impacts as guided by the Equator Principles²³ and Performance Standards.²⁴ We therefore expect that UKEF will incorporate these gender aspects into its due diligence, and that such incorporation will encourage other export agencies to be similarly guided, which will hopefully bring States closer to a harmonised set of guidelines for achieving gender equality in the workplace.

Policies encouraging shared parental leave are another example of good practice for integrating a gender perspective in the economic sphere. Sweden has been a pioneer of equal parental leave opportunities: its generous policy gives parents 480 days of paid leave, with each parent having an exclusive right to 90 of those days. Encouraging shared parental leave helps drive social change in perceptions towards parenting and affords both genders the opportunity to balance their career and family life, which in turn helps to equalise economic opportunity in the workplace.²⁵

Procurement Policies

Another example of good practice is the implementation of preferential public procurement policies. Enterprises owned by women currently face problems when competing in public tenders as they usually constitute smaller firms in terms of employment, revenues and asset base.²⁶ For example, South Africa uses a preference points system, through which enterprises owned by women receive extra points for their bids.²⁷ Similarly, in Israel, when two bids receive an identical number of points after evaluation, the bid from a business controlled by a women shall be chosen.²⁸ Governments could and should be encouraged to take steps towards reducing the obstacles faced by women seeking to participate in public tenders, and measures should be taken to increase the participation of small and medium-sized enterprises ("SMEs"). The implementation of such policies are expected to indirectly increase the participation of women, as they are statistically more likely to own such enterprises compared to men.²⁹

²² UK Export Finance: Policy and Practice on Environmental, Social and Human Rights Due Diligence and Monitoring, 31 March 2016; available at <https://www.gov.uk/government/publications/uk-export-finance-environmental-social-and-human-rights-policy>

²³ See for example, Equator Principles Association, Equator Principles, June 2013, p. 20; available at http://equator-principles.com/wp-content/uploads/2017/03/equator_principles_III.pdf

²⁴ See for example, International Finance Corporation, Performance Standards on Environmental and Social Sustainability, 2012, p. 18; available at https://www.ifc.org/wps/wcm/connect/c8f524004a73daeca09afdf998895a12/IFC_Performance_Standards.pdf?MOD=AJPERES

²⁵ Official site of Sweden; available at <https://sweden.se/quickfact/parental-leave/>

²⁶ Chatham House, The Royal Institute of International Affairs, Research Paper, 'Gender-Smart Procurement Policies for Driving Change', December 2017, p. 17; available at <https://www.chathamhouse.org/sites/default/files/publications/research/Gender-smart%20Procurement%20-%202020.12.2017.pdf>

²⁷ Republic of South Africa, Revised Preferential Procurement Regulations, 2017, Article 4(1); available at https://www.thedti.gov.za/economic_empowerment/docs/PPFA%20Regulation.pdf

²⁸ Government of Israel Ministry of Finance (2008), 'Mandatory Tenders Law, 5752-1992'; available at <https://www.mr.gov.il/Information/Training%20materials/Mandatory%20Tenders%20Law.pdf>

²⁹ Chatham House, The Royal Institute of International Affairs, Research Paper, 'Gender-Smart Procurement Policies for Driving Change', December 2017, p. 17; see footnote 26

Trade Liberalisation

Another example of good practice concerns trade liberalisation. Women are often disproportionately affected by trade and investment agreements and evidence shows that the role occupied by women in international trade is more likely to be as a wage worker than as a self-employed worker.³⁰ Some countries have addressed these obstacles by making explicit references to gender equality in the core text of trade agreements as a way to ensure women are able to occupy the same roles as their male counterparts in international trade. For example, the 2016 Chile-Uruguay free trade agreement currently includes a chapter on gender equality.³¹

Other States should be informed by this approach and seek to ensure a more comprehensive gender analysis is carried out on its existing trade agreements. For example, the Comprehensive Economic and Trade Agreement ("CETA") between the EU and Canada is due to enter into full force once the European Parliament gives its consent.³² However, its treatment of gender is very narrow. Part of the problem stems from the Sustainable Impact Assessment ("SIA")³³ that was used for CETA. The CETA SIA is almost 500 pages long, but the word "women" is used only six times and the word "gender" three times. Neither the executive summary nor recommendations of the main report contain any mention of possible gender implications.³⁴ The European Parliament noted this failure in its study of SIAs and recommend that all future SIAs ensure a systematic gender analysis is conducted and gender experts are appointed to be members of the relevant SIA main research team.³⁵

II. COMPANIES' DUE DILIGENCE

While it is difficult to find examples of how companies are adopting a gender lens to the CSR and ESG reporting, some companies have publically disclosed their efforts. Good examples include:

- Glaxo Smith Kline has set a target to have over 37% female representation in senior roles by 2022.³⁶
- Unilever's 'Sustainable Living Plan' identifies 'Opportunities for women' as an area of focus. It has declared a target of having 50% women in management positions by 2020.³⁷

³⁰ European Parliament, 'Gender Equality in Trade Agreements', Study for the FEMM Committee, 2016, p.6; available at [http://www.europarl.europa.eu/RegData/etudes/STUD/2016/571388/IPOL_STU\(2016\)571388_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/STUD/2016/571388/IPOL_STU(2016)571388_EN.pdf) and World Trade Institute, 'Gender Equality and Trade Policy', December 2017; available at https://www.wti.org/media/filer_public/8b/a8/8ba88d03-1a2b-4311-af6a-629d9997c54c/working_paper_no_24_2017_frohmann.pdf

³¹ Chile and Uruguay Free Trade Agreement, dated 4 October 2016; available at http://www.sice.oas.org/Trade/CHL_URY/CHL_URY_Text_s.pdf

³² EU-Canada Comprehensive Economic and Trade Agreement; available at https://ec.europa.eu/taxation_customs/sites/taxation/files/ceta_guidance_en.pdf

³³ SIAs are evaluations of the specific economic, environmental and social impacts of a proposed trade agreement, and can be a key tool for addressing gender concerns in trade negotiations.

³⁴ European Parliament, 'Gender Equality in Trade Agreements', Study for the FEMM Committee, 2016, pp. 33-34; see footnote 30.

³⁵ *Ibid.* p. 37

³⁶ Glaxo Smith Kline, 'Our approach to responsible business', September 2018; available at https://www.gsk.com/media/5097/our-approach-to-responsible-business_sept-18.pdf

³⁷ Unilever, 'The Unilever Sustainability Plan – Opportunities for Women', 2017; available at <https://www.unilever.co.uk/sustainable-living/the-unilever-sustainable-living-plan/opportunities-for-women/>.

Its outward facing responsibility missions include working under a Global Partnership Framework with UN Women to develop the company's Safety for Women and Girls programme. The goal is for the programme to be adapted and rolled out in an attempt to address women's safety issues in the various communities in which Unilever operates.³⁸

- ERGO (part of Munich Re) participates in the Logic-D project: a programme through which companies in Germany can "voluntarily and anonymously analyse their salary structures from a gender perspective".³⁹
- HP announced last year that the company will withhold up to 10% of all amounts invoiced by law firms that do not meet or exceed the company's minimal diverse staffing requirements. The diversity criteria include the requirement for at least one diverse firm relationship partner, or at least one woman and one racially/ethnically diverse attorney, each performing or managing at least 10% of the billable hours worked on HP matters.⁴⁰
- L'Oréal comes closest to integrating social and environmental concerns. It supports an initiative developing young women's leadership skills to enable them to achieve local climate adaptation projects which target climate change.⁴¹ It has also applied sustainability and gender targets to most of its regional operations, in each case reporting on progress in terms of diversity, sustainability and civil society.⁴²

All of these initiatives seek to address the problem of fewer women in management and on the board. However, many companies aren't adopting these gender initiatives for diversity sake alone. Investors have been increasingly interested in company performance in areas of diversity, and in particular, gender.⁴³ Recent reports have indicated that having a more diverse board has led to greater profits for companies, something that investors are interested in promoting.⁴⁴ Having women on boards is also becoming a requirement alongside meeting environmental, social, and governance targets in investors' due diligence on companies.⁴⁵ The concept of 'responsible investing', which takes into consideration environmental, social and governance concerns, is emerging among some investment funds, particularly in Europe where fund managers are increasingly taking into consideration the wider impact of

³⁸ *Ibid.*

³⁹ Viego Eiris Report 'Gender diversity in corporate senior management: glass ceiling yet to be cracked', March 2018, p. 12; available at <http://www.viego-eiris.com/wp-content/uploads/2018/03/Gender-diversity-in-senior-corporate-managment.pdf?x62552>

⁴⁰ Legal Week, 'HP to withhold fees from law firms that do not meet diversity requirements', published 14 February 2017; available at <https://www.law.com/legal-week/sites/legalweek/2017/02/14/hp-to-withhold-fees-from-law-firms-that-do-not-meet-diversity-requirements/?sreturn=20180929134929>

⁴¹ L'Oréal, 2017 Progress Report, 2017, p. 7; available at https://sharingbeautywithall.loreal.com/sites/default/files/cms/sbwa_2017_progress_report_eng_0.pdf

⁴² *Ibid.*

⁴³ Financial Times 'Diversity beyond gender proves hard for investors to measure', 15 October 2018; available at <https://www.ft.com/content/1c25eb00-ba56-11e8-8dfd-2f1cbc7ee27c>

⁴⁴ McKinsey&Company, 'Women in the Workplace', 2018; edited extract available at <https://www.mckinsey.com/featured-insights/gender-equality/women-in-the-workplace-2018>

⁴⁵ Private Fund Management, 'Diversity is the new ESG', 7 October 2018; available at <https://www.privatefundmanagement.net/diversity-new-esg-2/>

their investments.⁴⁶ Activist investors and private equity funds, such as Elliott, have made diversity an investment requirement encouraging companies to change their board structure and implement diversity policies.⁴⁷ Moreover, investor association reports have shown that companies which take gender diversity into account and act upon their diversity policies have a slightly lower chance of being subject to shareholder activism, which can cause disruptions to company management.⁴⁸

Whatever their motive, it is likely that investors will continue to push companies to publish and improve their diversity status as well as encourage companies to take into account ESG considerations. Investors are not necessarily requiring companies apply a gender lens to environmental and social issues, however they are combining these concepts in their due diligence and encouraging boards to produce data which demonstrates that companies are acting upon their wider social and environmental responsibilities.

III. GOVERNMENT AND COMPANY COLLABORATION

The recent partnership of the UK Government with Bloomberg L.P. which publishes the Gender-Equality Index ("GEI") is a good example of how governments and companies have worked together to develop reporting practices.⁴⁹ The GEI provides investors with comparable data on social factors relating to gender equality in the workplace and, as a result of the partnership, from 2019 the survey will incorporate six data points from the UK Government's pay gap methodology. The UK Government and Bloomberg plan to work together to, among other things, improve transparency of data on a global scale and promote membership of the GEI as a tool to transform gender equality in the workplace. By combining the government's practice of gathering data with Bloomberg's ability to distil the data into a gender rating, it's expected that investors will use the GEI as a short cut to identify and invest in companies that satisfy their gender requirements. This is expected to further encourage companies to address gender parity issues so that they can be rated favourably. This is a positive development in widening the focus of economic gender equality to a global level, but the success of the partnership is yet to be tested.

IV. CONCLUSION

In conclusion, States have implemented a number of good practices which show progress towards the integration of a gender perspective into their economic sphere, both through hard law such as the enactment of regulations and directives, to more soft-law approaches such as Gender Equality Plans and export credit agency policies. Similarly, companies have taken proactive steps towards adopting a gender lens when conducting due diligence. Going forward,

⁴⁶ Financial Times, 'ESG strategies lengthen hedge fund holding periods', 15 October 2018; available at <https://www.ft.com/content/9ef1ea3e-ba60-11e8-8dfd-2f1cbc7ee27c>. Hermes Investment Management Annual Report 2017, p. 5, "[...] a fundamental shift in our industry towards what we call "holistic returns". The importance of considering the wider impact of investment decisions on society as a whole is becoming mainstream"; available at https://www.hermes-investment.com/uk/wp-content/uploads/sites/80/2018/05/hermes_annual_report_2017.pdf

⁴⁷ Bloomberg, 'Activists should take the lead on board diversity', 5 April 2018; available at <https://www.bloomberg.com/gadfly/articles/2018-04-05/activist-investors-should-taker-the-lead-on-board-diversity>

⁴⁸ Alvarez & Marsal 'Activist Investors in Europe: who will they target next?', May 2018, p. 11; available at https://www.alvarezandmarsal.com/sites/default/files/activist_alert_report_may_2018.pdf

⁴⁹ UK Government Press Release, 'UK Government and Bloomberg L.P. announce partnership to promote and improve reporting on gender equality in the workplace', published 26 September 2018; available at <https://www.gov.uk/government/news/uk-government-and-bloomberg-lp-announce-partnership-to-promote-and-improve-reporting-on-gender-equality-in-the-workplace>

States and companies should build on the progress already made, and in particular, strive towards the creation of a uniform approach to gender equality across all countries, through the production of a comprehensive set of guidelines, so that women across the globe are able to participate freely and equally in the business sector.