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Human Capital Reporting in the Era of ESG: Analyzing HRA Disclosures and Transparency in Leading FMCG Companies in India

Dr. Pradhuman Adesra[1] | Meena Priyanka Dhanpal[2*]

[1]Research Supervisor, Department of A.B.S.T, University of Rajasthan, Jaipur, India.
[2]Research Scholar, Department of A.B.S.T, University of Rajasthan, Jaipur, India.

[*]Corresponding Author: meenapriyankapm5693@gmail.com

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Abstract

In the current business environment global ESG frameworks and traditional financial reporting have intertwined to redefine the organization value paradigm. The Human Capital Development(HCD) and Human Resource Accounting(HRA) have evolved from secondary disclosures to primary markers of a sustainable corporate strategy. Against the global context of sustainability ever so much at the forefront of corporate behaviour, and the impending imposition of mandatory regulatory rationale to ESG standards (e.g., the Business Responsibility and Sustainability Report (BRSR)that SEBI has heard will come into force), this paper investigates human capital reporting and disclosures in five leading Fast-Moving Consumer Goods (FMCG) companies in India (Hindustan Unilever, Dabur India, ITC, Britannia, and Nestle) as pioneers of practices that seek to achieve improved accountability in the coverage of significant parameters of the Subject Core Component. This study synthesizes recent literature across both emerging and developed markets to propose an integrated theoretical model of how ESG-driven HRA disclosures are associated with organizational governance and corporate performance. This paper used a content analysis study of top Indian FMCG companies including Hindustan Unilever Limited (HUL), ITC Limited, Dabur India and Nestle India to examine disclosure behaviour, reveal structural reporting gaps, and evaluate the influence of attributes of companies on human resource disclosure index. The preliminary finding is that tier-one Indian FMCG companies perform well on international ESG metrics on training, diversity, and occupational health, although the actual measuring of HRA metrics is not common and is usually not standardized in large-mid-sized firms. Finally, this study provide a framework for investor engagement to improve human capital transparency in EMs, alongside actionable policy recommendations.

Keywords: *Human Resource Accounting (HRA), ESG Reporting, Fast-Moving Consumer Goods (FMCG), Human Capital Management, BRSR, Corporate Transparency, Indian Capital Markets.*

Introduction

Background and Context

For decades, conventional financial accounting systems have focused on physical and financial assets, ignoring human capital investment as an operating expense rather than an investment generating long-term value. Yet, a knowledge-based economy constantly changing by new technology, automation of workforce and a lot of new things does exist: the human capital (workforce capability, organizational culture, intellectual property, and depth of leadership), provides an organization with a sustainable competitive advantage.

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The astonishing explosion of Environmental, Social, and Governance (ESG) investment criteria and impact investing have transformed the nature of corporate risk and opportunity assessment in global capital markets as we previously knew it. The Social () and Governance () pillars (part of the ESG paradigm) literally require fine grained access to how organizations recruit, develop, retain and protect their human capital. As a result, Human Resource Accounting (HRA) and Human Capital Disclosures (HCD) have transitioned from the sidelines of corporate social responsibility (CSR) narratives into the heart of mainstream investor communications and regulatory requirements.

Problem Statement

While its strategic importance is recognised, globally and in emerging markets including India, the standards for reporting are still highly fragmented. The difficulties in capturing human assets intangibles in traditional financial statements are a result of traditional accounting principles surrounding asset recognition and measurement. Some frameworks, such as the Global Reporting Initiative (GRI), Sustainability Accounting Standards Board, or the Business Responsibility and Sustainability Report (BRSR) from SEBI aim to standardise non-financial reporting, but are often based on input-based (i.e total training hours, total CSR ROI) rather than outcome based and quantifiable human capital metrics.

The new age demands agility of the workforce, corporate success directed by the ethics of the labor hiring process through the supply chain, efficiency of the sales force, and retention of talent, those elements that together drive India's Fast-Moving Consumer Goods (FMCG) sector, a labor-intensive, consumer-facing industry. Research shows a significant gap in disclosure quality across Indian FMCG firms. The constraints of financial capability and regulatory compliance for mid-sized enterprises create an information asymmetry between corporate managers and external stakeholders.

Research Objectives and Questions

This paper addresses these gaps by evaluating the following core objectives:

- **Conceptual Integration:** To synthesize theoretical perspectives connecting HRA, ESG frameworks, and corporate financial performance.
- **Empirical Evaluation:** To analyze human capital disclosure practices and transparency levels among leading Indian FMCG companies.
- **Determinant Analysis:** To investigate how firm characteristics (such as market capitalization, leverage, profitability, and ownership structure) influence human resource disclosure intensity in India.
- **Strategic Roadmap:** To outline a investor engagement and regulatory framework that elevates human capital reporting from compliance-driven narrative to quantitative asset valuation.

Research Questions

RQ1: How do ESG integration and market pressures influence corporate human capital disclosures and workforce upgrading strategies in emerging markets?

RQ2: To what extent do leading Indian FMCG firms disclose quantitative HRA metrics within their annual and sustainability reporting?

RQ3: What key firm characteristics drive variations in the Human Resource Disclosure Index (HRDI) across Indian consumer goods enterprises?

Theoretical Underpinnings & Conceptual Framework

- **Human Capital Theory**

Human Capital Theory is a concept derived from Schultz (1961) and Becker's (1964) definition of human capabilities in terms of skills, knowledge, and health, which can be increased through investment in education, training, and health. It comprises capital expenditure incurred for the purpose of business ranging from a variety of sectors, worker productivity enhancement and as well operational functionality of the organization with time limits with regards to employee training utilization of machine automation and technology. And Human Capital is considered today as one of the fundamental firm specific assets in the modern economy, providing economic rents.

- **Stakeholder Theory**

According to Freeman’s (1984) Stakeholder Theory managers should serve the also a wide range of stakeholders (employees, suppliers, customers, regulators, and communities) instead of only

maximizing shareholder value. Human capital disclosure speaks directly to internal stakeholders (employees) and external stakeholders (investors and regulators), outlining labor rights in disclosures along with fair remuneration structures, safe workplaces and career pathways without discrimination.

- **Signaling Theory**

Spence's theory(1993) is about how parties eliminate information asymmetry in economic transactions? In capital markets, managers have better information than external investors about the health of their internal human capital management. High quality HRA and ESG metrics help reduce cost of capital and lead to higher firm value because voluntary or regulated disclosure of them serves as a credible signal of operational resilience, corporate governance, and low tail-risk.

- **Legitimacy Theory**

The framework of Legitimacy Theory suggest that organizations continuously attempt to normatively behave within acceptable confines set by the societies in which they operate. ESG and human rights disclosures are in effect non-financial disclosures and act as a form of social license to operate. Companies undergoing increased public scrutiny, particularly for industries with long supply chains like the fast-moving consumer goods (FMCG) sector, may use HRA disclosures to show that they are meeting societal expectations and complying with ethical labor practices.

- **Literature Map: ESG& Human Capital**

Source Study	Focus Area	Key Findings / Insights
Kotsantonis& Serafeim (2020)	Outcome Metrics & Automation Risk	Advocates outcome-based HCD metrics over inputs; links HCD directly to employee productivity.
Ni (2025)	ESG& Human Capital Upgrading in China	Market-driven ESG disclosure yields a 5.3% relative increase in high-skilled labor force.
Pasigai et al. (2025)	Digitalization &ESG in HCM Systems	Highlights AI, HRIS, moral quotients, and privacy/bias ethical risks in digital HCM.
Jorgji et al. (2024)	Sustainable HCM& Firm Performance (S&P 500)	Sustainable HCM drives ESG performance, positively moderated by disclosure level.
Nanavati & Dave (2024)	Voluntary Disclosure in Indian FMCG Firms	Significant disclosure gaps exist across Indian FMCG annual and ESG reporting.
Chandiok (2026)	Environmental & Ethical Practices in India	Mixed-methods analysis showing policy-implementation gaps in mid-sized Indian enterprises.
Chaturvedi (2025)	CSR & Governance in Indian FMCG Sector	Ethical leadership and CSR enhance stakeholder trust and brand loyalty in top firms.
Aggarwal (2023)	Firm Characteristics & HR Disclosures in India	Net fixed assets and market cap positively impact HRDI; promoter holding shows a negative impact.

- **Global Perspectives on ESG and Human Capital Integration**

The corporate sustainability literature increasingly focused on human capital as a key driver of enterprise value. In an age of transformation, traditional human capital measures based on input (total training budget) will not reflect the ability of an organization to operate in a world threatened by technological disruption (Kotsantonis and Serafeim, 2020). They stress on the transparent reporting of outcome-based metrics—internal promotion rates, human capital return on investment (HCROI), and task automation risk indices—which all demonstrate that firms disclose transparent report outcome metrics are associated with improved labor productivity and improved risk-adjusted returns for institutional investors.

Similarly, Jorgji et al. (2024) study 387 S P 500 firms across a decade (2013-2023) finding that sustainable human capital management through employee benefits, training expenditures, pay equity and diversity and inclusion strategies leads to tangible improvement in overall ESG performance. More importantly, their research finds that ESG disclosure intensity is a positive moderator – for firms

- **Human Capital Upgrading in Emerging Markets**

The impact of market-driven ESG frameworks in emerging market economies presents unique dynamics. Analyzing panel data of listed firms, Ni (2025) provides evidence that the introduction of third-party ESG disclosures led to a statistically significant 5.3% shift toward high-skilled workers relative to low-skilled personnel. This structural upgrading of corporate human capital was driven by stock price discipline, enhanced institutional oversight, and increased technology investments, particularly within technology-intensive and state-owned enterprises.

In a comprehensive systematic literature review spanning 2015 to 2025, Pasigai et al. (2025) synthesized the intersection of digital transformation and ESG-aligned human capital management (HCM). They identified key technological drivers—including artificial intelligence (AI), Human Resource Information Systems (HRIS), and predictive workforce analytics—while highlighting emerging ethical risks such as workplace surveillance, algorithmic bias in hiring, and employee data privacy violations. They contend that modern HCM frameworks must combine quantitative metrics (e.g., moral quotient indices and multi-criteria decision models) with employee-centered governance to preserve organizational legitimacy.

- **The Indian Corporate Landscape & FMCG Sector Disclosures**

In the context of emerging market economies, the mechanisms of influence of market-driven ESG frameworks are different. Using panel data of listed firms and difference-in-difference specifications, Ni (2025) show that the introduction of third-party ESG disclosures caused a statistically significant 5.3% increase in the share of high-skilled labor compared to low-skilled labor. Stock price discipline, stronger institutional oversight and higher technology investments, especially within technology-intensive and state-owned firms made the restructuring of corporate human capital.

Pasigai et al. (2025) conducted an extensive systematic literature review for the period 2015–2025, and synthesized work in digital transformation and ESG-aligned HCM. These using critical drivers of technology (e.g., Artificial Intelligence (AI), Human Resource Information Systems (HRIS), and predictive workforce analytics) alongside emergent ethical risks (e.g., preparing the workplace, algorithm bias in hiring, and violations of employee data privacy). They argue that contemporary HCM frameworks combine quantitative metrics (like moral quotient indices and multi-criteria decision models) with employee-centered governance to maintain the legitimacy of organizations.

Research Methodology & Model Specification

- **Sample and Data Collection**

The research is mixed-method, utilising empirical content analysis of public filings combined with quantitative regression modeling ideas adapted to the Indian FMCG transfer to practices. The analysis is on some top-listed firms in the fast-moving consumer goods (FMCG) domain on the National Stock Exchange (NSE) of India over a multi-year period (FY 2021–22 to FY 2025–26) with the data incorporation of :

- Annual Integrated Reports and Standalone Financial Statements.
- Business Responsibility and Sustainability Reports (BRSR) filed with SEBI.
- Corporate Sustainability Reports aligned with GRI and SASB standards.

- **Construction of the Human Resource Disclosure Index (HRDI)**

To quantify human capital disclosure transparency, a unweighted binary Content Analysis approach is adopted, establishing an index based on 25 specific HRA and ESG human capital items categorized into five sub-dimensions:

$$\mathrm{HRDI}_i = \frac{\sum_{j=1}^{m} d_{ij}}{M}$$

Where:

- $d_{ij} = 1$ if item j is disclosed by firm i, and 0 otherwise.
- $M = 25$ (total maximum score achievable).

Table 1: Human Resource Disclosure Index (HRDI) Items & Dimensions

Dimension	Item Code	Description / Indicator	Framework Alignment
A. Workforce Demographics & DEI	A1	Age, gender, and regional employee distribution	BRSR Core / GRI 405
	A2	Ratio of female representation in executive/board roles	SEBI / GRI 405
	A3	Differently-abled (PWD) employee hiring metrics	BRSR Pillar 3
	A4	Gender pay gap ratio disclosures	SASB / GRI 405
	A5	Formal anti-harassment (POSH) cases and resolution rate	Companies Act / BRSR
B. Learning & Capital Upgrading	B1	Average training hours per employee per category	GRI 404 / BRSR
	B2	Expenditure on reskilling and digital literacy programs	Kotsantonis& Serafeim
	B3	Skill gap assessment and future-of-work readiness plans	Pasigai et al. (2025)
	B4	Leadership succession planning transparency	Governance / SASB
	B5	Educational reimbursement and lifelong learning policies	GRI 404
C. HRA Metrics & Productivity	C1	Valuation of Human Capital (Lev & Schwartz / Flamholtz model)	Traditional HRA
	C2	Human Capital Return on Investment (HCROI)	Outcome Metric
	C3	Revenue and net profit per full-time employee (FTE)	Financial Efficiency
	C4	Employee Turnover and Attrition Rate (Voluntary vs Non-voluntary)	BRSR Core / GRI 401
	C5	Employee Value Added (EVA per employee)	Financial HRA
D. Occupational Health & Safety	D1	Lost Time Injury Frequency Rate (LTIFR)	BRSR / GRI 403
	D2	Health and safety audits across supply chain / factories	ISO 45001 / BRSR
	D3	Mental health and employee well-being initiatives	ESG Social Pillar
	D4	Work-related fatalities and safety corrective action plans	BRSR Core
	D5	Safety training coverage for third-party contract labor	Supply Chain ESG
E. Governance & Labor Rights	E1	Percentage of workforce covered by collective bargaining	GRI 102 / BRSR
	E2	Fair living wage and minimum wage compliance certifications	Social Ethics
	E3	Human rights due diligence across manufacturing/distributors	Chandiok (2026)
	E4	Whistleblower mechanism and grievance redressal reporting	Governance / BRSR
	E5	External assurance of human capital / BRSR metrics	SEBI Assurance

- **Regression Model Specification**

Building upon Aggarwal (2023) and Jorgji et al. (2024), we specify a panel regression model to identify the determinants of human capital disclosure intensity among Indian FMCG firms:

$$\mathrm{HRDI}_{it} = \beta_0 + \beta_1 \ln(\mathrm{MCAP}_{it}) + \beta_2 \mathrm{ROE}_{it} + \beta_3 \mathrm{LEV}_{it} + \beta_4 \mathrm{PROM}_{it} + \beta_5 \mathrm{BRSR_ASSURE}_{it} + \varepsilon_{it}$$

Where:

- HRDI_{it}: Human Resource Disclosure Index score for firm i in year t.
- $\ln(\mathrm{MCAP}_{it})$: Natural logarithm of total market capitalization (proxy for firm size).
- ROE_{it}: Return on Equity (proxy for financial profitability).
- LEV_{it}: Total Debt to Equity ratio (proxy for financial leverage).
- PROM_{it}: Percentage of promoter equity shareholding.
- $\mathrm{BRSR_ASSURE}_{it}$: Dummy variable ($1$ if firm obtains third-party reasonable/limited assurance on BRSR human capital indicators, 0 otherwise).
- ε_{it}: Error term.

Comparative Analysis of Leading Indian FMCG Companies

To evaluate how human capital reporting operates in practice, we examine four leading Indian FMCG entities reflecting distinct operational models: Hindustan Unilever Limited (HUL), ITC Limited, Dabur

Metric / Indicator	HUL	ITC Ltd.	Dabur India	Nestle India
Primary ESG Framework	BRSR / GRI / SASB	BRSR / GRI / Integrated	BRSR / GRI	BRSR / Corporate
Disclosed Training Hours/FTE	High (>25 hrs)	High (>28 hrs)	Moderate (12–18 hrs)	High (>22 hrs)
Gender Diversity (Workforce)	~25–30%	~15–20%	~10–15%	~20–25%
Formal HRA Model Valuation	Narrative / HCROI	Capital Valuation	Basic Expenditure	Operational metrics
Contract Labor Safety Coverage	100% Audited	100% Audited	Partial / Expanding	100% Audited
BRSR External Assurance	Reasonable / Limited	Reasonable / Limited	Limited	Limited

- **Hindustan Unilever Limited (HUL)**

HUL stands as a benchmark for ESG integration and human capital reporting in the Indian corporate ecosystem.

- **Workforce Upgrading & Future of Work:** Aligned with the findings of Kotsantonis& Serafeim (2020), HUL emphasizes outcome metrics. Through its "Future-fit Workforce" initiative, HUL reports detailed data on employee reskilling, digital literacy across its supply chain, and agile working models.
- **DEI and Safety:** HUL maintains high transparency regarding gender representation across managerial tiers, POSH case resolutions, and manufacturing safety (LTIFR).
- **Reporting Gap:** While HUL excels in GRI and BRSR compliance, formal financial valuation of human resources (e.g., historical cost or present value models on the balance sheet) is omitted in favor of value-addition statement narratives.

- **ITC Limited**

ITC Limited demonstrates a deeply institutionalized approach to ESG reporting, driven by its multi-business model spanning FMCG, paperboards, hotels, and agri-business.

- **Human Capital & Social Capital Synergy:** ITC integrates human capital reporting with rural livelihood generation, detailing extensive training programs for factory workers, field staff, and agricultural supply partners (Chaturvedi, 2025).
- **Safety and Labor Rights:** ITC achieves top-tier scores in occupational safety reporting across its nationwide manufacturing facilities, providing third-party assured data for both permanent and contract labor.
- **Quantification:** ITC's integrated annual reports explicitly link human capital inputs to intellectual and organizational capital outcomes, aligning closely with the multi-criteria models described by Pasigai et al. (2025).

- **Dabur India Limited**

Dabur represents an established, family-promoter-led FMCG enterprise undergoing digital transformation.

- **Disclosure Trends:** In alignment with Aggarwal (2023), firms with higher promoter holdings historically disclosed less voluntary HRA data. However, mandatory BRSR compliance has led Dabur to significantly enhance its reporting on occupational health, safety training, and workplace diversity.
- **Gaps:** Human capital disclosures remain largely input-focused (e.g., total CSR spending and basic training counts) rather than outcome-driven productivity analytics or structured skill-gap evaluations.

- **Nestle India Limited**

Nestle India applies global parent standards to its domestic reporting framework, maintaining strong consistency in health, safety, and operational ethics disclosures.

- **Technical Reskilling:** The company provides detailed disclosures on technical training programs for factory personnel, quality assurance teams, and nutritional research units.
- **Governance and Compliance:** Whistleblower procedures, POSH compliance, and supply chain labor safety standards receive high disclosure priority, reflecting global ESG alignment (Jorgji et al., 2024).

Findings and Empirical Discussion

- **Regulatory Compliance vs. True Transparency**
  - **Predominance of Input Metrics:** A major proportion of FMCG firms limit disclosures to input metrics—such as total training spend or total headcount—rather than reporting outcome metrics like skill acquisition, internal mobility, or HCROI (Kotsantonis& Serafeim, 2020).
  - **Omission of Formal HRA Models:** Classical accounting models for human valuation (such as the Lev & Schwartz present value model) are rarely integrated into modern financial reporting. Instead, companies prefer narrative disclosures embedded in BRSR Principle 3 ("Employee Well-being") reports.
  - **The Role of Digitalization and AI:** Matching the insights of Pasigai et al. (2025), top Indian FMCG firms are adopting automated HRIS systems and digital learning platforms. However, explicit disclosures regarding the ethical risks of AI in talent acquisition, employee data privacy, or algorithmic surveillance are virtually non-existent in current annual filings.

- **Determinants of Disclosure (Evaluating Hypothesized Determinants)**

Consistent with Aggarwal (2023), financial characteristics strongly dictate HRDI scores in the Indian FMCG industry:

- **Firm Size & Market Capitalization (+):** Larger firms (e.g., HUL, ITC) face greater institutional scrutiny, possess superior resources for non-financial accounting, and capture higher visibility through ESG indexes.
- **Leverage (+) & Profitability (+):** Highly profitable firms utilize voluntary HRA disclosures to signal management superiority and lower their cost of debt/equity financing (Jorgji et al., 2024).

- **Promoter Shareholding (—) & Private Ownership:** Companies with concentrated promoter shareholding tend to provide fewer voluntary disclosures beyond mandatory legal requirements, confirming the inverse relationship identified in prior literature.

Ethical Risks, Challenges, and Regulatory Gaps

- **Algorithmic Bias and Digital Surveillance**

From managing the sales force to automated warehouse logistics, a large number of FMCG companies are increasingly tracking their workers through the digital frontiers. Previous literature emphasizes that in the absence of formal ethical governance frameworks, algorithmic monitoring can violate employee data privacy and contribute to discriminatory bias in performance assessment systems (Pasigai et al., 2025). Further, the existing BRSR and annual reports provide very little guidance or reporting requirements around these technology risks.

- **Supply Chain Labor and Contractual Workforce Opacity**

The FMCG model is entirely dependent on indirect labour — third-party logistical operators, agricultural field hands, contract-packaging representatives, outsourced retail merchandisers etc. In contrast, while top tier firms require environmental and safety audits for tier-1 suppliers (Chandiok, 2026) there remains little visibility across mid-sized enterprises as to the level of deep supply chain transparency on the living wages, social security coverage and collective bargaining rights afforded to contract labour.

- **"Social-Washing" and Assurance Gaps**

Many human capital metrics are not legally required to be audited at all, let alone to the same standards as core financial accounting, but instead can rely on "limited assurance" or even voluntary third-party reviews. This results in a risk of "social-washing", where organizations present as positive leaders in the workforce world (through employee wellness apps or winning CSR awards) while hiding behind deeper structural issues such as high voluntary turnover, pay inequity, or over-reliance on low wage gig work.

Actionable Recommendations for Stakeholders

For Corporate Leaders and HR Executives:

- **Shift to Outcome-Focused Metrics:** Supervene an input (training expenditure) with tangible outcomes (examples: employee net promoter scores (eNPS), rate of fill of internal vacancies, and productivity return per unit of compensation).
- **Establish AI & Data Privacy Governance:** Create transparent protocols governing automated workforce monitoring, ensuring algorithmic fairness audits are conducted and reported in ESG disclosures.
- **Extend HRA to Contractual Workforce:** Apply audits on safety, health care, and fair wages to contract labour and supply chain partners

For Regulators and Standard-Setting Bodies (SEBI &ICAI):

- **Mandate BRSR Core Assurance for Human Capital:** Require reasonable third-party assurance of information on selected social and labor metrics (e.g., wage distribution, LTIFR, and POSH compliance to reduce information asymmetry.
- **Develop Standardized Indian HRA Guidelines:** The ICAI in association with the global sustainability boards should formulate standard Indian HRA guidelines — guidelines towards the development of a standard valuation system for human capital assets and for the related corporate behavior with regard to integrated reporting models.

For Institutional Investors and ESG Analysts:

- **Incorporate Job Automation & Reskilling Risk:** Because automation is quickly changing the logistics and manufacturing businesses, we will assess the adaptiveness of these companies — including any plans or track record for reskilling workers.
- **Engage Promoters on Human Capital Governance:** Advocate for promoter-led companies to adopt voluntary disclosures around HRA and independent board oversight using proxy voting rights.

Conclusion

The incorporation of ESG (environmental, social and governance) criteria into the corporate evaluation has turned Human Capital Accounting into an urgent strategic need for sustainability of capital allocation, moving it from the theory of academic curiosity into practice. Empirical studies in the global as well as Indian context have shown that effective human capital management and healthy human capital disclosure yield dividends in the terms of productivity, lower operational risk and even far better long-term financial performance.

Regulatory and policy frameworks: Specific to India, regulatory frameworks such as theBRSR by SEBI (Securities and Exchange Board of India) have been instrumental in enhancing baseline disclosure standards in the Indian FMCG sector, with market leaders such as HUL (Hindustan Unilever Ltd.) and ITC also adopting integrated reporting formats covering the GRI (Global Reporting Initiative) standards. Still, important gaps exist around standardized measurement of human capital, outcome-driven reskilling indicators, rich labor transparency in the supply chain, and ethical governance of technology used in the workplace. Bridging these gaps demands a coordinated approach among corporate leaders, accounting standards setters, and institutional investors to ensure that human capital reporting becomes a fundamental thread embedded in the corporate strategy and economic value creation, especially in emerging markets.

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