

PATH TO 100

A practical company roadmap for stronger viewpoint diversity

MARKET • WORKPLACE • PUBLIC SQUARE

How to use this guide

Use these ten action areas to identify the highest-impact policy and governance changes your company can make. The guide consolidates related expectations, but it does not replace the current methodology or guarantee a particular score. Review the applicable benchmarks, preserve evidence for each change, and complete the Viewpoint Diversity Score survey wherever company disclosure is required.

What Strong Performance Looks Like

- Publishes clear, objective, and consistently applied service terms.
- Protects customers, employees, and vendors from religious or ideological discrimination.
- Provides meaningful notice when restricting an account, service, transaction, or content.
- Respects lawful off-duty speech, religious exercise, association, assembly, protest, and civic activity.
- Treats faith-based employee groups and religious charities on equal terms.
- Keeps employment and development opportunities open to all qualified people.
- Bases employment decisions on qualifications, performance, merit, and equal opportunity.
- Avoids demographic quotas and workplace or public messaging that assigns guilt, status, or responsibility by identity.
- Uses political, legal, charitable, and institutional influence in ways that respect fundamental freedoms.
- Makes policies and practices verifiable through current public evidence and complete survey responses.

The Ten Highest-Impact Action Areas

Each action area combines related expectations into a company-facing governance standard. Where a section combines more than one scoring standard, the distinctions are identified explicitly.

1. Publish Clear Service Terms and Provide Meaningful Notice

Why it matters

Customer-facing rules should define prohibited conduct through objective behavior rather than subjective reactions or disputed labels. When a company restricts an account, service, transaction, or content, the affected person should receive enough information to understand and respond.

What to do

- Review the terms governing each core product and service, including account agreements, acceptable-use policies, community rules, and seller, advertising, developer, or platform terms.
- Remove or narrowly define vague terms such as “hate speech,” “misinformation,” “offensive,” “objectionable,” or “controversial” unless tied to clear conduct-based limits.
- Protect lawful expression across political, religious, social, scientific, and cultural viewpoints while retaining narrow rules against clearly defined harms.
- Apply harmful-conduct rules equally to all groups.
- When taking adverse action, identify what is affected, give the specific policy reason, and state whether the restriction is temporary, permanent, or indefinite and, when possible, its duration.

Make it verifiable

Keep current U.S.-applicable versions publicly accessible, dated, searchable, and consistent across business lines. Place the notice commitment in a master agreement or other major core policy. Retire superseded versions, repair broken links, and remove clauses allowing action “at any time,” “for any reason,” or “with or without notice” when those clauses undermine the stated commitment.

2. Affirm Religious and Ideological Diversity

Why it matters

Companies should recognize religious and ideological differences within the workforce and, where applicable, describe how they protect freedom of expression and freedom of religion or belief for external stakeholders.

What to do

- Adopt a workforce policy that values employees’ differing religious, moral, political, and ideological beliefs.
- Encourage civil disagreement and mutual respect across differences in belief and viewpoint.
- Recognize the business value of diverse viewpoints, including stronger decision-making, creativity, and engagement.
- In the company’s most recent relevant public report, describe voluntary efforts to protect freedom of expression and freedom of religion or belief for customers, users, sellers, creators, and other external stakeholders.

Make it verifiable

Publish the workforce commitment in an official governance document, such as a code of conduct or employee handbook. Place the external-stakeholder commitment in the company’s most recent CSR, ESG, sustainability, human-rights, civil-rights, or comparable report.

Important distinction: The workplace commitment and the external-stakeholder commitment are separate standards. A company may satisfy one without satisfying the other.

3. Respect Vendor Independence and Viewpoint Equality

Why it matters

Suppliers, vendors, contractors, and contingent workers should remain free to operate according to their missions, values, and lawful workforce practices, and they should not be treated differently because of religion or ideology.

What to do

- Adopt a Third-Party Workforce Freedom Policy respecting vendors’ lawful hiring and employment decisions.
- Do not require vendors to adopt DEI training, workforce quotas, demographic targets, programming, or disclosures as a condition of doing business.
- Distinguish optional supplier-diversity outreach from mandatory contractual conditions.
- Prohibit religious and ideological discrimination against vendors, suppliers, contractors, and comparable third parties.
- Review supplier codes, procurement terms, ESG questionnaires, Tier 2 reporting requirements, contract templates, and contingent-worker policies for hidden mandates or unequal treatment.

Make it verifiable

Use the survey to confirm practices that are not public and retain the written policies supporting the response. Publish any vendor nondiscrimination or freedom commitment when feasible. Ordinary legal, safety, ethics, and human-rights requirements may remain.

Important distinction: Vendor workforce autonomy and vendor nondiscrimination are related but separate. A company can perform well under one standard and poorly under the other.

4. Protect Lawful Off-Duty Expression and Religious Exercise

Why it matters	Employees should not face discipline for lawful off-duty expression or religious practice that is unrelated to legitimate workplace needs.
What to do	• Affirm employees' lawful off-duty rights to speech, religion, association, assembly, protest, and political or civic activity. • Limit restrictions to defined concerns such as illegality, confidentiality, conflicts of interest, job performance, material workplace disruption, or misuse of company resources. • Review social-media, outside-activity, conduct, and reputation clauses for vague standards that reach lawful private conduct. • Adopt a written religious-accommodation policy with examples, a clear request path, the governing undue-hardship standard, and a process for individualized review. • Train supervisors and human-resources personnel to administer accommodation requests consistently.
Make it verifiable	Make applicable policies easy for employees to locate, retain training records, and ensure public statements and survey responses are consistent. Because the accommodation benchmark is survey-only, complete every required survey response and follow-up.

5. Treat Religious Employee Groups Equally

Why it matters	Faith-based employee resource groups should receive the same recognition and support available to comparable employee groups.
What to do	• Establish a neutral process through which employees may form faith-specific ERGs. • Formally recognize at least one faith-specific ERG where employees seek recognition and satisfy the same neutral requirements applied to other groups. • Publish an accurate list of active ERGs, including religious groups. • Provide equal access to funding, communications, meeting space, executive sponsorship, events, and other resources. • Avoid extra approval requirements or subject-matter restrictions that apply only to faith-based groups.
Make it verifiable	Document formal recognition and equal treatment, retain current ERG lists and governance materials, and answer the related survey questions completely.

6. Ensure Equal Access to Charitable and Nonprofit Programs

Why it matters	Religious organizations should not be excluded from employee giving, corporate philanthropy, nonprofit discounts, volunteer benefits, or donation-processing programs merely because they are religious or operate according to lawful faith-based beliefs.
What to do	• Allow religious nonprofits to participate on the same terms as comparable secular organizations. • Permit support for worship, ministry, religious education, and advocacy from a faith-based perspective when comparable secular activities are eligible. • Do not exclude organizations solely because they follow lawful faith-based employment or governance standards. • Review the company's eligibility rules and the rules used by third-party administrators, platforms, and validation providers. • Evaluate matching-gift, grantmaking, nonprofit-discount, volunteer, product-donation, and payment-processing programs separately.

Make it verifiable

Publish clear eligibility standards, identify third-party administrators, and retain documentation showing equal access. Equal treatment in one program does not cure an exclusion in another.

Important distinction: A company should not assume a program is neutral merely because eligibility decisions are delegated to a third party.

7. Keep Opportunities and Employment Decisions Merit-Based

Why it matters

Equal opportunity is strongest when recruitment, development, and advancement are open to all qualified people and decisions are based on qualifications, performance, and merit.

What to do

- Open internships, fellowships, apprenticeships, recruiting programs, mentoring, sponsorship, networking, and leadership development to all qualified applicants or employees.
- Use neutral eligibility criteria and broad outreach without demographic exclusion or preference.
- Affirm that hiring, promotion, compensation, development, and other employment decisions are based on qualifications, performance, merit, and equal opportunity.
- Remove demographic quotas, representation targets, candidate-slate requirements, and compensation measures tied to race, sex, sexual orientation, or gender identity.
- Remove or clearly supersede older reports, webpages, and program descriptions that continue to advertise discontinued goals.

Make it verifiable

Review careers pages, program criteria, annual and ESG reports, proxy statements, executive-compensation measures, and partner-run programs for inconsistent language. Preserve evidence showing that outdated commitments have been replaced.

8. Avoid Divisive Concepts in Training and Public Messaging

Why it matters

Companies can promote respectful conduct and address discrimination without assigning guilt, bias, oppression, victimhood, or moral worth to people because of race, religion, or sex.

What to do

- Ensure employee training and public messaging promote equal treatment without requiring affirmation of contested group-based theories.
- Remove or revise materials that present disputed concepts as required beliefs, assign collective guilt or moral status by identity, or pressure employees or the public to accept ideological conclusions.
- Evaluate meaning, context, and application rather than relying on a fixed list of terms.
- Distinguish ordinary nondiscrimination and respectful-workplace training from instruction that classifies or denigrates people by identity.

Make it verifiable

Review employee training and public-facing materials within the applicable lookback period. Preserve the revised materials and evidence showing that superseded content is no longer operative.

Important distinction: Workforce training and public advocacy are evaluated separately even when similar concepts appear in both.

9. Align Corporate Influence with Fundamental Freedoms

Why it matters

A company's political giving, advocacy, litigation, memberships, donations, and partnerships can strengthen or weaken freedom of speech and religion.

What to do	• Establish written review criteria for political contributions that consider candidates' records on freedom of speech and religion. • Review lobbying, coalition participation, public statements, and advocacy campaigns for support of legislation that restricts fundamental freedoms or opposition to legislation that protects them. • Review amicus briefs, legal filings, and public statements before supporting a litigation position that may affect freedom of expression or religion. • Screen donations, grants, sponsorships, memberships, coalitions, and joint initiatives for support of censorship, deplatforming, viewpoint-based exclusion, or harmful restrictions on speech or religion. • Document who approves these activities, the standards applied, and the reasons for each decision.
Make it verifiable	Maintain a documented review and approval process for political giving, advocacy, legal participation, memberships, donations, sponsorships, and partnerships. Retain the evidence reviewed and the final approval record.

10. Make Every Practice Verifiable

Why it matters	A favorable practice may not receive credit if it cannot be located, dated, or confirmed. Survey completion is essential for practices that are not publicly verifiable.
What to do	• Complete every applicable survey question and each triggered follow-up. • Ensure public policies are current, accessible without login, clearly titled, and applicable to the correct audience, product, service, or program. • Retain the exact policy, report, training, contract term, eligibility rule, or program document supporting each answer. • Check that no current public document contradicts a favorable survey response. • Confirm that third-party administrators apply the company's stated standards in practice.
Make it verifiable	Before submission, run a final evidence audit covering the working link, current version, precise location, readable supporting text, correct audience, ultimate-parent applicability, and consistency with the survey response.

A Practical Implementation Sequence

1. Inventory	Collect operative customer terms, supplier requirements, employee policies, training, ERG materials, giving rules, political and legal activity, partnerships, and public messaging.
2. Adopt standards	Approve consolidated company-wide standards so business units do not create conflicting rules.
3. Remediate	Revise vague terms, exclusions, mandates, quotas, divisive content, and harmful advocacy or partnerships.
4. Publish and train	Publish the applicable commitments, update third-party contracts, and train the employees who administer them.
5. Verify and disclose	Test links and program eligibility, preserve evidence, and complete the survey with all applicable follow-up questions.

Common Reasons Companies Miss Full Credit

- A favorable policy exists but is not publicly accessible or was not disclosed through the survey.
- A third-party administrator imposes an exclusion inconsistent with the company's stated standard.

- An outdated report or webpage still advertises a discontinued practice.
- The policy applies to employees but not to customers, vendors, or another relevant stakeholder group.
- The survey response omits a required follow-up question or supporting detail.
- The only favorable policy belongs to a subsidiary rather than the ultimate parent company.
- A broad discretionary clause undermines an otherwise favorable policy.
- The evidence applies to the wrong jurisdiction, product, service, program, or audience.

Verification Crosswalk

The categories below describe the most common evidence path. The current methodology controls where a specific benchmark differs. Hybrid denotes public and/or survey responses can be utilized for scoring

#	Action area	Primary domain	Typical evidence path
1	Clear service terms and notice	Market	Public
2	Religious and ideological diversity	Workplace / Market	Public
3	Vendor independence and equality	Market	Hybrid
4	Off-duty rights and accommodation	Workplace	Hybrid
5	Religious ERGs	Workplace	Hybrid
6	Charitable and nonprofit access	Workplace / Public Square	Hybrid
7	Merit-based opportunities	Workplace	Hybrid
8	Divisive concepts	Workplace / Public Square	Hybrid
9	Corporate influence	Public Square	Public
10	Verification and disclosure	All	Survey

Note: *This guide provides practical company-facing guidance. The current methodology and survey govern scoring.*

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