

## Robust Labour Management Policies & Procedures

### Criterion 6: The COP describes robust commitments, strategies or policies in the area of labour

Indicate which of the following best practices are described in your COP:

- ☒ Reference to principles of relevant international labour standards (ILO Conventions) and other normative international instruments in company policies
  - 1 While the 10 Global Compact principles are based on international conventions, organizations are encouraged to reference these documents explicitly to show detailed understanding of the Global Compact principles' underlying meaning.
- ☐ Reflection on the relevance of the labour principles for the company
  - 1 The company should reflect on (1) significant labour-related social and economic impacts of the enterprise and (2) whether such impact could substantively influence the assessments and decisions of the organization's stakeholders.
- ☐ Written company policy to obey national labour law, respect principles of the relevant international labour standards in company operations worldwide, and engage in dialogue with representative organization of the workers (international, sectoral, national).
- ☐ Inclusion of reference to the principles contained in the relevant international labour standards in contracts with suppliers and other relevant business partners
- ☒ Specific commitments and Human Resources policies, in line with national development priorities or decent work priorities in the country of operation
  - 1 Examples: Inclusion of vulnerable/discriminated groups in the workforce (e.g., women, disabled, migrant, HIV/AIDS, older/younger workers); equal pay for work of equal value; contribution to national strategies to eliminate child/forced labour, etc.
- ☐ Participation and leadership in wider efforts by employers' organizations (international and national levels) to jointly address challenges related to labour standards in the countries of operation, possibly in a tripartite approach (business - trade union - government).
- ☐ Structural engagement with a global union, possibly via a Global Framework Agreement
- ☐ Other established or emerging best practices
  - 1 Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff
  - 1 This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.

### Criterion 7: The COP describes effective management systems to integrate the labour principles

Indicate which of the following best practices are described in your COP:

- ☒ Risk and impact assessments in the area of labour
- ☒ Dialogue mechanism with trade unions to regularly discuss and review company progress in addressing labour standards
- ☒ Allocation of responsibilities and accountability within the organization
- ☐ Internal awareness-raising and training on the labour principles for management and employees

- ☐ Active engagement with suppliers to address labour-related challenges
- ☒ Grievance mechanisms, communication channels and other procedures (e.g., whistleblower mechanisms) available for workers to report concerns, make suggestions or seek advice, designed and operated in agreement with the representative organization of workers
- ☐ Other established or emerging best practices
  - 1 Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff
  - 1 This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.

### Criterion 8: The COP describes effective monitoring and evaluation mechanisms of labour principles integration

Indicate which of the following best practices are described in your COP:

- ☒ System to track and measure performance based on standardized performance metrics
- ☒ Dialogues with the representative organization of workers to regularly review progress made and jointly identify priorities for the future
- ☐ Audits or other steps to monitor and improve the working conditions of companies in the supply chain, in line with principles of international labour standards
- ☒ Process to positively engage with the suppliers to address the challenges (i.e., partnership approach instead of corrective approach) through schemes to improve workplace practices
- ☐ Outcomes of integration of the Labour principles
  - 1 To report main incidents involving the company disclosure that your organization had no labour-related abuses in the past year satisfies this best practice where providing details may be counterproductive.
- ☐ Other established or emerging best practices
  - 1 Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff
  - 1 This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.

## Robust Environmental Management Policies & Procedures

### Criterion 9: The COP describes robust commitments, strategies or policies in the area of environmental stewardship

Indicate which of the following best practices are described in your COP:

- ☒ Reference to relevant international conventions and other international instruments (e.g. Rio Declaration on Environment and Development)
- ☒ While the 10 Global Compact principles are based on international conventions organisations are encouraged to reference these documents explicitly to show detailed understanding of the Global Compact principles' underlying meaning.
- ☒ Reflection on the relevance of environmental stewardship for the company
- ☒ In making that determination, the company should consider (1) if it has potentially significant environmental impacts and (2) whether such impact could substantively influence the assessments and decisions of the organisation's stakeholders.
- ☒ Written company policy on environmental stewardship
- ☐ Inclusion of minimum environmental standards in contracts with suppliers and other relevant business partners
- ☐ Specific commitments and goals for specified years
- ☐ Other established or emerging best practices
- ☒ Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff
- ☒ This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.

### Criterion 10: The COP describes effective management systems to integrate the environmental principles

Indicate which of the following best practices are described in your COP:

- ☒ Environmental risk and impact assessments
- ☒ Assessments of lifecycle impact of products, ensuring environmentally sound management policies
- ☒ Allocation of responsibilities and accountability within the organisation
- ☒ Internal awareness-raising and training on environmental stewardship for management and employees
- ☐ Grievance mechanisms, communication channels and other procedures (e.g. whistleblower mechanisms) for reporting concerns or seeking advice regarding environmental impacts
- ☒ Other established or emerging best practices
- ☒ Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff
- ☒ This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.

### Criterion 11: The COP describes effective monitoring and evaluation mechanisms for environmental stewardship

Indicate which of the following best practices are described in your COP:

- ☐ System to track and measure performance based on standardized performance metrics
- ☒ Leadership review of monitoring and improvement results
- ☐ Process to deal with incidents
- ☐ Audits or other steps to monitor and improve the environmental performance of companies in the supply chain
- ☐ Outcomes of integration of the environmental principles
- ☒ To report main incidents involving the company, disclose that your organization had no environmental incidents in the past year satisfies this best practice. Suggested GRI Indicators: EN 1-3, 5-6, 8, 10, 13, 16, 18-20, 26-27.
- ☐ Other established or emerging best practices
- ☒ Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff
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## Robust Anti-Corruption Management Policies & Procedures

- ➊ Criteria and best practices under Anti-Corruption implementation have been modified to reflect the **Anti-Corruption Reporting Guidance**. Best practices reflect specific reporting elements of the guidance, either Basic (numbers starting with B) or desired (numbers starting with D).

### Criterion 12: The COP describes robust commitments, strategies or policies in the area of anti-corruption

Indicate which of the following best practices are described in your COP:

- ☒ Publicly stated formal policy of zero-tolerance of corruption (D1)
- ☒ Commitment to be in compliance with all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes (B2)
- ☒ Statement of support for international and regional legal frameworks, such as the UN Convention against Corruption (D2)
- ☐ Detailed policies for high-risk areas of corruption (D4)
- ☐ Policy on anti-corruption regarding business partners (D5)
- ☐ Other established or emerging best practices
- ➋ Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff
- ➌ This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.

### Criterion 13: The COP describes effective management systems to integrate the anti-corruption principle

Indicate which of the following best practices are described in your COP:

- ☒ Support by the organization's leadership for anti-corruption (B4)
- ☒ Carrying out risk assessment of potential areas of corruption (D3)
- ☐ Human Resources procedures supporting the anti-corruption commitment or policy, including communication to and training for all employees (B5 + D8)
- ☐ Internal checks and balances to ensure consistency with the anti-corruption commitment (B6)
- ☒ Actions taken to encourage business partners to implement anti-corruption commitments (D6)
- ☒ Management responsibility and accountability for implementation of the anti-corruption commitment or policy (D7)
- ☐ Communications (whistleblowing) channels and follow-up mechanisms for reporting concerns or seeking advice (D9)
- ☒ Internal accounting and auditing procedures related to anticorruption (D10)
- ☐ Other established or emerging best practices

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### Criterion 14: The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption

Indicate which of the following best practices are described in your COP:

- ☐ Leadership review of monitoring and improvement results (D12)
- ☒ Process to deal with incidents (D13)
- ☐ Public legal cases regarding corruption (D14)
- ☐ Use of independent external assurance of anti-corruption programmes (D15)
- ☐ Outcomes of integration of the anti-corruption principle
- ➋ Outcomes of assessments of potential corruption (D3) and mechanisms for seeking advice/reporting (D9). Procedures supporting anti-corruption policy. Disclosure that your organization had no incidents suffices where providing details is counterproductive. GRI indicators SO2-4.
- ☐ Other established or emerging best practices
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## Taking Action in Support of Broader UN Goals and Issues

⊕ "Broader UN Goals and Issues" refers to an array of global issues—based on the most acute or chronic global challenges—including:

Peace & Security	Migration
Millennium Development Goals	Food Security
Human Rights	Sustainable Ecosystems and Biodiversity
Children's Rights	Climate Change Mitigation and Adaptation
Gender Equality	Water Security and Sanitation
Health	Employment and Decent Working Conditions
Education	Anti-Corruption
Humanitarian Assistance	

For a list of further Global Issues that are relevant to the work of the UN as well as business, please refer to [business.un.org](http://business.un.org)

### Criterion 15: The COP describes core business contributions to UN goals and issues

Indicate which of the following best practices are described in your COP:

- ☐ Align core business strategy with one or more relevant UN goals/issues
- ☒ Develop relevant products and services or design business models that contribute to UN goals/issues
- ☐ Adopt and modify operating procedures to maximize contribution to UN goals/issues
- ☐ Other established or emerging best practices
- ☒ Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

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### Criterion 16: The COP describes strategic social investments and philanthropy

Indicate which of the following best practices are described in your COP:

- ☒ Pursue social investments and philanthropic contributions that tie in with the core competencies or operating context of the company as an integrated part of its sustainability strategy
- ☐ Coordinate efforts with other organizations and initiatives to amplify—and not negate or unnecessarily duplicate—the efforts of other contributors
- ☐ Take responsibility for the intentional and unintentional effects of funding and have due regard for local customs, traditions, religions, and priorities of pertinent individuals and groups
- ☐ Other established or emerging best practices
- ☒ Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

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### Criterion 17: The COP describes advocacy and public policy engagement

Indicate which of the following best practices are described in your COP:

- ☒ Publicly advocate the importance of action in relation to one or more UN goals/issues
- ☒ Commit company leaders to participate in key summits, conferences, and other important public policy interactions in relation to one or more UN goals/issues
- ☐ Other established or emerging best practices
- ☒ Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

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### Criterion 18: The COP describes partnerships and collective action

Indicate which of the following best practices are described in your COP:

- ☒ Develop and implement partnership projects with public or private organizations (UN entities, government, NGOs, or other groups) on core business, social investments and/or advocacy
- ☐ Join industry peers, UN entities and/or other stakeholders in initiatives contributing to solving common challenges and dilemmas at the global and/or local levels with an emphasis on initiatives extending the company's positive impact on its value chain
- ☐ Other established or emerging best practices
- ☒ Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

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## Corporate Sustainability Governance and Leadership

### Criterion 19: The COP describes CEO commitment and leadership

Indicate which of the following best practices are described in your COP:

- ☒ CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN Global Compact
- ☐ CEO promotes initiatives to enhance sustainability of the company's sector and leads development of industry standards
- ☒ CEO leads executive management team in development of corporate sustainability strategy, defining goals and overseeing implementation
- ☐ Make sustainability criteria and UN Global Compact principles part of goals and incentive schemes for CEO and executive management team
- ☐ Other established or emerging best practices
  - Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

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  - This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.

### Criterion 20: The COP describes Board adoption and oversight

Indicate which of the following best practices are described in your COP:

- ☒ Board of Directors (or equivalent) assumes responsibility and oversight for long-term corporate sustainability strategy and performance
- ☒ Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability.
- ☒ Board (or committee), where permissible, approves formal reporting on corporate sustainability (Communication on Progress)
- ☐ Other established or emerging best practices
  - Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

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### Criterion 21: The COP describes stakeholder engagement

Indicate which of the following best practices are described in your COP:

- ☒ Publicly recognize responsibility for the company's impacts on internal and external stakeholders
- ☐ Define sustainability strategies, goals and policies in consultation with key stakeholders
  - Regular stakeholder consultations in the area of human rights, labour, environment and anti-corruption. List of stakeholder groups engaged by the organization. Develop process for identifying key stakeholders and report on outcomes of consultation.
- ☐ Consult stakeholders in dealing with implementation dilemmas and challenges and invite them to take active part in reviewing performance
- ☐ Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect 'whistle-blowers'
- ☐ Other established or emerging best practices
  - Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).
- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff
  - This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.

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## ANNEX: Business & Peace

The COP describes policies and practices related to the company's core business operations in high-risk or conflict-affected areas

Indicate which of the following best practices are described in your COP:

- ☐ Information on how policies, strategies and operating practices have been adapted to the specific high-risk/conflict context based on due diligence
- ☒ Adherence to best practices even where national law sets a lower standard, including in the management of security services
- ☒ Management of the supply chain to avoid contributing to conflict through purchasing decisions and practices
- ☐ Other established or emerging best practices
  - ☒ Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff
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The COP describes policies and practices related to the company's government relations in high-risk or conflict-affected areas

Indicate which of the following best practices are described in your COP:

- ☒ Assessment of opportunities for constructive engagement with government actors in order to support peace
- ☒ Measures undertaken to avoid complicity in human rights violations by government actors
- ☒ Management practices aimed at preventing corrupt relationships with government officials
- ☐ Other established or emerging best practices
  - ☒ Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff
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The COP describes local stakeholder engagement and strategic social investment activities of the company in high-risk or conflict-affected areas

Indicate which of the following best practices are described in your COP:

- ☒ Stakeholder engagement mechanisms across company and contractor operations
- ☐ Approaches to stakeholder engagement involving civil society, international organizations, etc
- ☐ Actions toward constructive and peaceful company-community engagement
- ☐ Sustainable social investment projects
- ☐ Other established or emerging best practices
  - ☒ Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff
  - ☒ This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.



# Entertainment Solutions COP 2014

Please enter a short title for your submission.

The Communication on Progress is in the following format:

- ☐ Stand-alone document
- ☐ Part of a sustainability or corporate (social) responsibility report
- ☒ Part of an annual (financial) report

What is the time period covered by your COP? **FY 2014**

Does your COP contain a statement by the CEO (or equivalent) expressing continued support for the Global Compact and renewing your company's ongoing commitment to the initiative and its principles? **Y**

Does your COP contain a description of actions and policies related to the following issue areas?

Human Rights	Labour	Environment	Anti-Corruption
Yes <input checked="" type="checkbox"/>	Yes <input checked="" type="checkbox"/>	Yes <input checked="" type="checkbox"/>	Yes <input checked="" type="checkbox"/>
No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>	No <input type="checkbox"/>

Does your COP contain, if relevant, a description of policies and practices related to your company's operations in high-risk and/or conflict-affected areas? **Y** (N.A.)

- If yes, see additional questions in the Annex. The Global Compact - PRI Guidance on Responsible Business and Investment in Conflict-Affected & High-Risk Areas defines "high-risk" or "conflict-affected" areas as:
- o those that are not currently experiencing high levels of armed violence, but where political and social instability prevails;
  - o those in which there are serious concerns about abuses of human rights and political and civil liberties, but where violent conflict is not present;
  - o those that are currently experiencing violent conflict, including civil wars, armed insurrections and other types of organized violence, and those that are in transition from violent conflict to peace, often referred to as "post-conflict" (where there may be a risk of falling back into violent conflict).

Does your COP include qualitative and/or quantitative measurement of outcomes illustrating the degree to which targets/performance indicators were met? **Y**

How does your organization share its COP with stakeholders?

- ☐ Through the UN Global Compact website only
- ☒ COP is easily accessible to all interested parties (e.g., via its website)
- ☐ COP is actively distributed to all key stakeholders (e.g., investors, employees, consumers, local community)
- ☐ Both b) and c)

How is the accuracy and completeness of information in your COP assessed by a credible third-party?

- ☒ Note that assessment of the accuracy and completeness of information in your COP by a credible third-party became a requirement of COPs at the GC Advanced level as of 1 January, 2014. The Global Compact recognizes that there are various options in terms of external assessment. High-quality external assessment should ideally encompass qualitative and quantitative information and performance data in the COP, as well as an explanation of the management systems and processes that foster their credibility. A credible third party is defined as groups or individuals external to the reporting organization who are demonstrably competent in both the subject matter and assurance practices. For optional guidance on the assurance process, companies may refer to p. 41 of the GRI Guidelines (version G3.1).

Information is reviewed by multiple stakeholders (e.g., representatives of groups prioritized in stakeholder analysis)

- ☐ Information is reviewed by a panel of peers (e.g., members of the same industry, competitors, benchmarked leaders, others organized via Global Compact Local Network)
- ☐ Information is assured by independent assurers (e.g., accounting or consulting firm) using their own proprietary methodology
- ☐ Information is assured by independent assurers (e.g., accounting or consulting firm) against recognized assurance standard (e.g., ISAE3000, AA1000AS, other national or industry-specific standard)
- ☐ Other established or emerging best practices

- ☒ Please use the text box below to publicly share any other best practices. 255 characters or less, including spaces.

The COP describes any action(s) that the company plans to undertake by its next COP to have the credibility of the information in its COP externally assessed, including goals, timelines, metrics, and responsible staff

The COP incorporates the following high standards of transparency and disclosure:

- ☐ Applies the Global Reporting Initiative (GRI) Sustainability Reporting Guidelines
- ☐ Qualifies for Level B or higher of the GRI G3 or G3.1 application levels
- ☐ Is 'in accordance - core' with GRI G4
- ☒ Is 'in accordance - comprehensive' with GRI G4

Provides information on the company's profile and context of operation

- ☒ Such as: Legal, group and ownership structure. Countries and scale of operation. Markets served (geographic/sector breakdown, types of customers/beneficiaries). Primary brands/products/services. Supply chain. Commitments to external initiatives.



## Summary of Criteria

### Implementing the Ten Principles into Strategies & Operations

- Criterion 1: The COP describes mainstreaming into corporate functions and business units
- Criterion 2: The COP describes value chain implementation

#### Robust Human Rights Management Policies & Procedures

- Criterion 3: The COP describes robust commitments, strategies or policies in the area of human rights
- Criterion 4: The COP describes effective management systems to integrate the human rights principles
- Criterion 5: The COP describes effective monitoring and evaluation mechanisms of human rights integration

#### Robust Labour Management Policies & Procedures

- Criterion 6: The COP describes robust commitments, strategies or policies in the area of labour
- Criterion 7: The COP describes effective management systems to integrate the labour principles
- Criterion 8: The COP describes effective monitoring and evaluation mechanisms of labour principles integration

#### Robust Environmental Management Policies & Procedures

- Criterion 9: The COP describes robust commitments, strategies or policies in the area of environmental stewardship
- Criterion 10: The COP describes effective management systems to integrate the environmental principles
- Criterion 11: The COP describes effective monitoring and evaluation mechanisms for environmental stewardship

#### Robust Anti-Corruption Management Policies & Procedures

- Criterion 12: The COP describes robust commitments, strategies or policies in the area of anti-corruption
- Criterion 13: The COP describes effective management systems to integrate the anti-corruption principle
- Criterion 14: The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption

### Taking Action in Support of Broader UN Goals and Issues

- Criterion 15: The COP describes core business contributions to UN goals and issues
- Criterion 16: The COP describes strategic social investments and philanthropy
- Criterion 17: The COP describes advocacy and public policy engagement
- Criterion 18: The COP describes partnerships and collective action

### Corporate Sustainability Governance and Leadership

- Criterion 19: The COP describes CEO commitment and leadership
- Criterion 20: The COP describes Board adoption and oversight
- Criterion 21: The COP describes stakeholder engagement

## Criteria, Best Practices and Explanation

### Implementing the Ten Principles into Strategies & Operations

@ The term 'value chain', for purposes of this self-assessment, refers to an organization's business partners both upstream (including suppliers and subcontractors) and downstream (e.g. for transport of finished products).

#### Criterion 1: The COP describes mainstreaming into corporate functions and business units

Indicate which of the following best practices are described in your COP:

- ☒ Place responsibility for execution of sustainability strategy in relevant corporate functions (procurement, government affairs, human resources, legal, etc) ensuring no function conflicts with company's sustainability commitments and objectives
  - ☐ Align strategies, goals and incentive structures of all business units and subsidiaries with corporate sustainability strategy
  - ☐ Assign responsibility for corporate sustainability implementation to an individual or group within each business unit and subsidiary
  - ☒ Design corporate sustainability strategy to leverage synergies between and among issue areas and to deal adequately with trade-offs
  - ☒ Ensure that different corporate functions coordinate closely to maximize performance and avoid unintended negative impacts
  - ☐ Other established or emerging best practices
- ① Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff

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#### Criterion 2: The COP describes value chain implementation

Indicate which of the following best practices are described in your COP:

- ☒ Analyze each segment of the value chain carefully, both upstream and downstream, when mapping risks, opportunities and impacts
- ☐ Communicate policies and expectations to suppliers and other relevant business partners
- ☐ Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company's sphere of influence
- ☒ Undertake awareness-raising, training and other types of capacity building with suppliers and other business partners
- ☐ Other established or emerging best practices



- Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff
- This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.

## Robust Human Rights Management Policies & Procedures

- ⊕ Criteria and best practices under human rights implementation have been modified to reflect the Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework (the Guiding Principles), as well as the Human Rights COP Reporting Guidance. Best practices reflect specific reporting elements of the latter guidance, either Basic (numbers starting with BRE) or Advanced (numbers starting with ARE).

**Criterion 3: The COP describes robust commitments, strategies or policies in the area of human rights**  
Indicate which of the following best practices are described in your COP:

- ☒ Commitment to comply with all applicable laws and respect internationally recognized human rights, wherever the company operates (e.g., the Universal Declaration of Human Rights, Guiding Principles on Human Rights) (BRE1 + ARE1)
- The Guiding Principles suggest that this should include a commitment to treat the risk of causing or contributing to gross human rights abuses as a legal compliance issue wherever the company operates
- ☐ Integrated or stand-alone statement of policy expressing commitment to respect and support human rights approved at the most senior level of the company (BRE 1 + BRE5 + ARE 1 + ARE 5)
- ☐ Statement of policy stipulating human rights expectations of personnel, business partners and other parties directly linked to operations, products or services (BRE 1)
- ☒ Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties (BRE 1 + BRE 5 + ARE 1 + ARE 5)
- ☐ Other established or emerging best practices
- Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff
- This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.

**Criterion 4: The COP describes effective management systems to integrate the human rights principles**  
Indicate which of the following best practices are described in your COP:

- ☐ Process to ensure that internationally recognized human rights are respected
- ☐ On-going due diligence process that includes an assessment of actual and potential human rights impacts (BRE 2 + BRE 3 + ARE 2 + ARE 3)
- The Guiding Principles suggest that the assessment:
  - Include the risk of impacts the business enterprise may be involved in through its own activities, business relationships, and country and/or industry context
  - Involve meaningful consultation with potentially affected groups and other relevant stakeholders to assess actual and potential impacts as well as risks
  - Be ongoing and evolving, adapted to size and complexity
  - Be included in risk management systems

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The Guiding Principles also suggest that risks should not be limited to the risks to the company itself (material) but should also include risks to right-holders. Lastly the Guiding Principles suggest that findings from impact assessments should be integrated across relevant internal functions and processes.

- ☐ Internal awareness-raising and training on human rights for management and employees
- ☐ Operational-level grievance mechanisms for those potentially impacted by the company's activities (BRE 4 + ARE 4)
- ☐ Allocation of responsibilities and accountability for addressing human rights impacts
- ☐ Internal decision-making, budget and oversight for effective responses to human rights impacts
- ☐ Processes to provide for or cooperate in the remediation of adverse human rights impacts that the company has caused or contributed to (BRE 3+ BRE 4 + ARE 3 + ARE 4)
- ☐ Process and programs in place to support human rights through: core business; strategic philanthropic/social investment; public policy engagement/advocacy; partnerships and/or other forms of collective action (BRE 6 + ARE 6)
- ☐ Other established or emerging best practices
- ☒ Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff

☒ This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.

## Criterion 5: The COP describes effective monitoring and evaluation mechanisms of human rights integration

Indicate which of the following best practices are described in your COP:

- ☒ System to monitor the effectiveness of human rights policies and implementation with quantitative and qualitative metrics, including in the supply chain (BRE3 + ARE3)
  - ☒ The Guiding Principles also suggest that such monitoring should be based on qualitative and quantitative indicators
  - ☐ Monitoring drawn from internal and external feedback, including affected stakeholders
  - ☐ Leadership review of monitoring and improvement results
  - ☐ Process to deal with incidents the company has caused or contributed to for internal and external stakeholders (BRE 4 + ARE 4)
  - ☐ Grievance mechanisms that are legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue (BRE4 + ARE4)
  - ☐ Outcomes of integration of the human rights principles
  - ☐ - Outcomes of due diligence process
- Suggested GRI Indicators: HR2 Percentage of significant suppliers, contractors, and other business partners that have undergone human rights screening, and actions taken. HR10 Percentage and total number of operations that have been subject to human rights reviews and/or impact assessments.)*
- External and formal reporting of operations or operating contexts that pose risks of severe human rights impacts. The Guiding Principles suggest that communications should:
    - (a) Be of a form and frequency that reflect an enterprise's human rights impacts and that are accessible to its intended audiences;
    - (b) Provide information that is sufficient to evaluate the adequacy of an enterprise's response to the particular human rights impact involved;
    - (c) In turn not pose risks to affected stakeholders, personnel or to legitimate requirements of commercial confidentiality.
  - Disclosure of main incidents involving the company. The Global Compact Office acknowledges that providing such details may be counterproductive for various reasons related to the protection of human rights, and that confidentiality may, at times, be more effective in alleviating human rights abuses.
  - Outcomes of remediation processes of adverse human rights impacts (Suggested GRI Indicator: HR11 Number of grievances related to human rights filed, addressed and resolved through formal grievance mechanisms.)
- ☐ Other established or emerging best practices
  - ☒ Specify in under 255 characters, including spaces. Alternatively, indicate if your COP does not address this criterion but explains the reason for omission (e.g., criterion deemed immaterial, legal prohibitions, privacy, competitive advantage).

- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff
- ☒ This option is for companies that have not yet begun to implement this criterion, but transparently and thoroughly disclose future plans to progress in this area in their COP.