



ecovadis

EcoVadis Corporate Social  
Responsibility (CSR)  
Assessment Report

Company assessed:  
RUBIX GROUP INTERNATIONAL LTD (GROUP)

Overall score: 56 /100  
April 2020

CSR performance: Moderate

Size: L  
Headquarters country: United Kingdom  
Risk country operations: Yes  
Industry: Wholesale of other machinery and  
equipment

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## ABOUT CORPORATE SOCIAL RESPONSIBILITY (CSR)

Corporate Social Responsibility (CSR) is the continuing commitment to act responsibly by integrating social and environmental concerns into business operations. CSR goes beyond regulatory compliance to focus on how companies manage their economic, social and environmental impacts, as well as their relationships with stakeholders (e.g. employees, trading partners, government).

## ABOUT THE ASSESSMENT

The EcoVadis methodology framework assesses companies' policies and actions as well as their published reporting related to the environment, labor and human rights, ethics and sustainable procurement. Our team of international sustainability experts analyze and crosscheck companies' data (supporting documents, 360° Watch Findings, etc.) in order to create reliable ratings, taking into account each company's industry, size and geographic location.

## ABOUT ECOVADIS

EcoVadis provides the leading solution for monitoring sustainability in global supply chains. Using innovative technology and CSR expertise, we strive to engage companies and help them adopt sustainable practices.

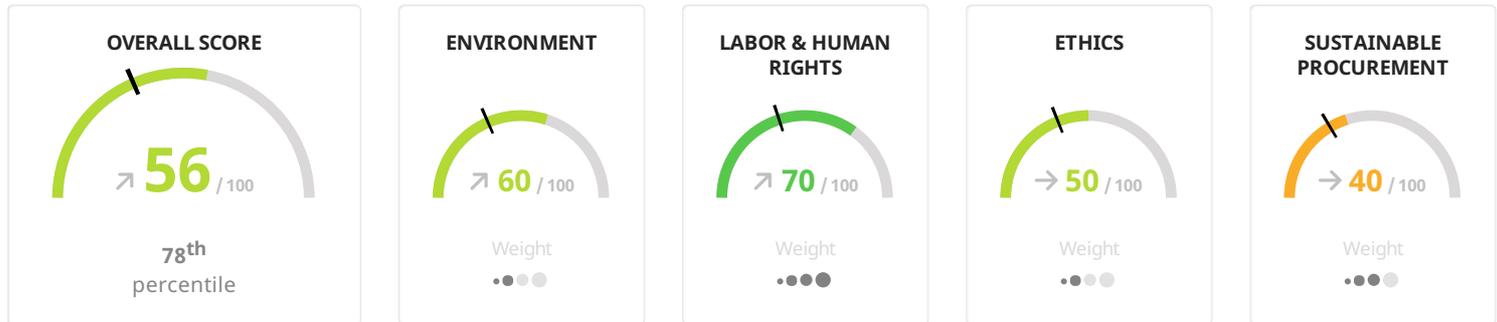
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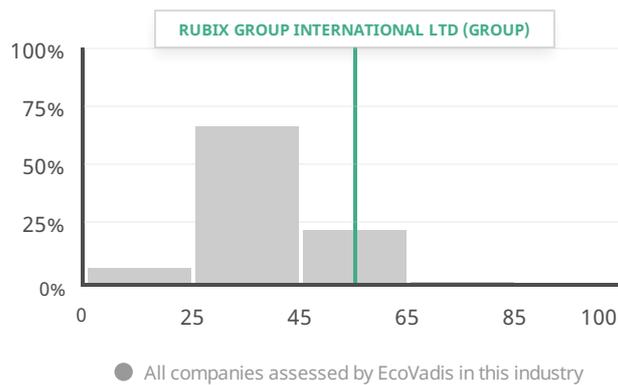
# 1. CSR PERFORMANCE OVERVIEW

## Score breakdown

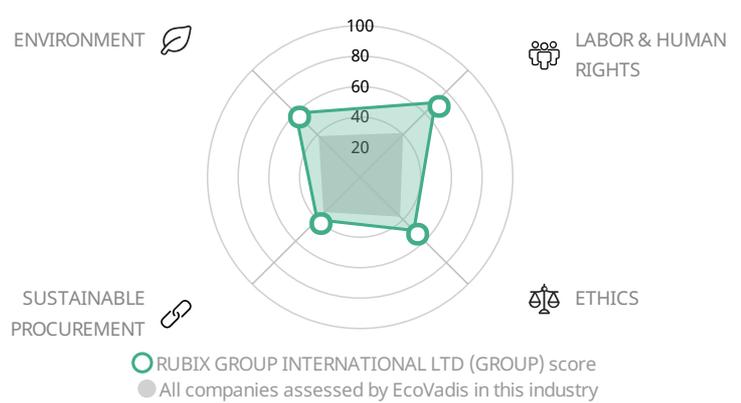
CSR Performance ● Insufficient ● Partial ● Moderate ● Advanced ● Outstanding — Average score



## Overall score distribution



## Theme score comparison



RUBIX GROUP INTERNATIONAL LTD (GROUP) has been awarded a silver medal in recognition of CSR achievement! To receive this medal, companies must have an overall score of 54-66.

## Corrective Action Plan in progress

The Corrective Action Plan is a collaborative feature designed to support companies' CSR performance improvement. It enables companies to build an improvement plan online, communicate planned and completed corrective actions and share feedback. RUBIX GROUP INTERNATIONAL LTD (GROUP) has a corrective action plan in place and is working on improving their CSR management system.

\* You are receiving this score/medal based on the disclosed information and news resources available to EcoVadis at the time of assessment. Should any information or circumstances change materially during the period of the scorecard/medal validity, EcoVadis reserves the right to place the business' scorecard/medal on hold and, if considered appropriate, to re-assess and possibly issue a revised scorecard/medal.

## 2. ASSESSMENT BENEFITS

### Understand :

**Get a clear picture of a company's CSR performance.** The scorecard is the final output of the EcoVadis assessment. It rates and benchmarks a company's CSR performance in four themes on a scale of 0-100 and highlights strengths and improvement areas.

**Know where a company stands compared to their industry.** Benchmark the company's CSR performance against the industry with a score distribution graph and theme score comparisons.

**Identify industry trends.** Discover the primary CSR risks, regulations, hot topics and best practices related to specific industries.

### Communicate :

**Meet customer needs.** More and more companies raise questions about their trading partners' environmental and social performance. The EcoVadis assessment allows companies to demonstrate their commitment.

**Leverage a unique communication tool.** Companies with an EcoVadis Scorecard avoid audit fatigue by sharing one assessment with all requesting customers.

## 3. ASSESSMENT PROCESS

1

### Customer Request

Procurement, CSR, EHS, and Sustainability leaders in enterprises looking to monitor CSR risk in the supply chain request an EcoVadis assessment for their trading partners.

2

### Questionnaire

Based on a company's specific Corporate Social Responsibility (CSR) risk factors, a customized questionnaire is created. It contains 20 to 50 questions tailored to the industry, size and location.

3

### Document Analysis

Companies are required to provide supporting documentation for their answers to the questionnaire. These documents are reviewed by our CSR analysts.

4

### Public Information

Company information that is publically available, most often found on the company website, is also collected as evidence of their CSR performance.

5

### 360° Watch Findings

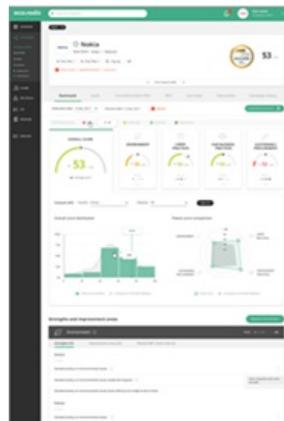
360° Watch Findings comprise relevant public information about companies' CSR practices, identified via more than 2,500 data sources. They can have positive, negative or no score impact.

6

### Expert Analysis

Our CSR analysts combine all these elements to produce one unified scorecard per company.

### SCORECARD



## 4. ECOVADIS METHODOLOGY

### A. Four Themes and 21 Criteria

EcoVadis assessments focus on 21 issues which are grouped into 4 themes (Environment, Labor & Human Rights, Ethics, Sustainable Procurement). The 21 issues or criteria are based upon international CSR standards such as the Global Compact Principles, the International Labour Organization (ILO) conventions, the Global Reporting Initiative (GRI) standard, the ISO 26000 standard, and the CERES principles.

#### 21 CSR criteria

#### 1. ENVIRONMENT

##### OPERATIONS

Energy consumption & GHGs  
Water  
Biodiversity  
Local & Accidental Pollution  
Materials, Chemicals & Waste

##### PRODUCTS

Product Use  
Product End-of-Life  
Customer Health & Safety  
Environmental Services & Advocacy

#### 3. ETHICS

Corruption  
Anticompetitive Practices  
Responsible Information Management

#### 2. LABOR & HUMAN RIGHTS

##### HUMAN RESOURCES

Employee Health & Safety  
Working Conditions  
Social Dialogue  
Career Management & Training

##### HUMAN RIGHTS

Child Labor, Forced Labor & Human Trafficking  
Diversity, Discrimination & Harassment  
External Stakeholders Human Rights

#### 4. SUSTAINABLE PROCUREMENT

Supplier Environmental Practices  
Supplier Social Practices



### B. Seven Management Indicators

EcoVadis assessments evaluate a company's CSR management system by looking at seven management indicators. These are used to further customize the assessment by weighting the four themes and their subsequent 21 CSR criteria.



#### Policies (weight: 25%)

1. Policies: Mission statements, policies, objectives, targets, governance
2. Endorsement: Endorsement of external CSR initiatives

#### Actions (weight: 40%)

3. Measures: Measures and actions implemented (e.g. procedures, training, equipment)
4. Certifications: Certifications and labels (e.g. ISO 14001)
5. Coverage: Coverage of measures and actions

#### Results (weight: 35%)

6. Reporting: Reporting on Key Performance Indicators (KPIs)
7. 360: Condemns, Controversies, Awards

## 5. UNDERSTANDING A SCORECARD

The overall score can be better understood by looking at quantitative information (theme scores and activated criteria) and qualitative information (strengths and improvement areas).

### A. Quantitative Information: Scores & Activated Criteria

#### Theme Scores:

Like the overall score, theme scores are on a scale of 1 to 100.

#### Activated Criteria:

Each of the four themes (Environment, Labor & Human Rights, Ethics, Sustainable Procurement) have specific criteria associated with them. Because the questionnaire is customized by industry, size and location, not all 21 criteria are activated for every company and some criteria are weighted more heavily than others.

#### Non-activated

If certain criteria are not activated, then the specific associated issue is not relevant or has very low CSR risk for that company.

Medium

Medium importance criteria are the issues some CSR risk is present but not the most pressing.

High

High importance criteria are the issues where the company faces the greatest CSR risk.

#### ! Risk countries only

Criteria classified as Only in Risk Countries are activated only if the company has significant operations in one or more countries identified as risky.

### C. The Scoring Scale

0 - 24	Insufficient	No engagements or tangible actions regarding CSR. Evidence in certain cases of misconduct (e.g. pollution, corruption).
25 - 44	Partial	No structured CSR approach. Few engagements or tangible actions on selected issues. Partial reporting on Key Performance Indicators. Partial certification or occasional labeled product.
45 - 64	Moderate	Structured and proactive CSR approach. Engagements/policies and tangible actions on major issues. Basic reporting on actions or Key Performance Indicators.
65 - 84	Advanced	Structured and proactive CSR approach. Engagements/policies and tangible actions on major issues with detailed implementation information. Significant CSR reporting on actions and Key Performance Indicators.
85 - 100	Outstanding	Structured and proactive CSR approach. Engagements/policies and tangible actions on all issues with detailed implementation information. Comprehensive CSR reporting on actions and Key Performance Indicators. Innovative practices and external recognition.

### B. Qualitative Information: Strengths & Improvement Areas

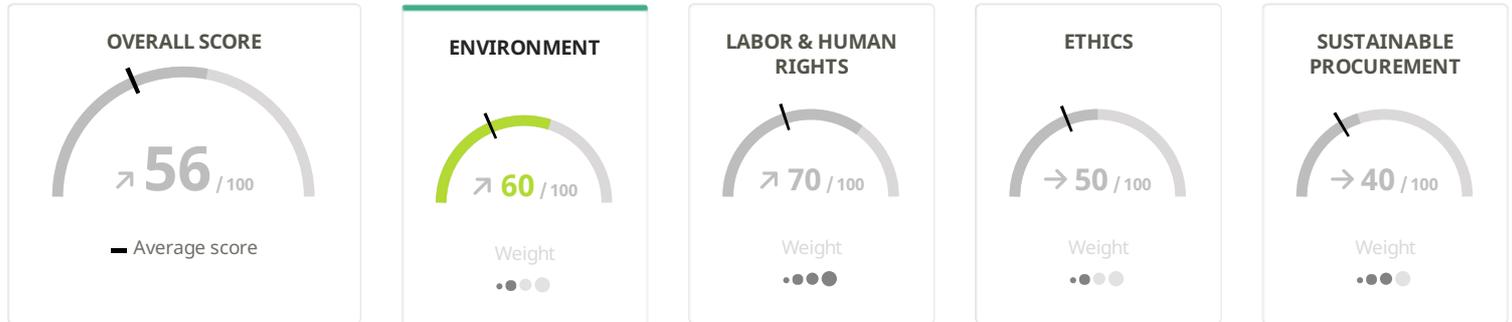
Qualitative information provides more details and insights into a company's score. For each theme, the company is assigned strengths (elements of their CSR management system that are positive) and improvement areas (elements of their CSR management system that need to be improved). The strengths and improvement areas are divided according to the three management layers (Policies, Actions, Results) and are also classified by priority.

All improvement areas are automatically added to the company's Corrective Action Plan. They are pre-organized by priority. The Corrective Action Plan is a collaborative feature designed to support companies' CSR performance improvement. It enables companies to build an improvement plan online, communicate planned and completed corrective actions and share feedback.

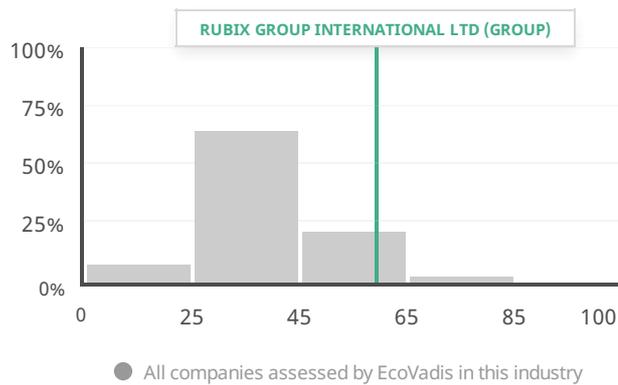
## 6. ENVIRONMENT

This theme takes into account both operational factors (e.g. energy consumption, waste management) and product stewardship (e.g. product end-of-life, customer health and safety issues).

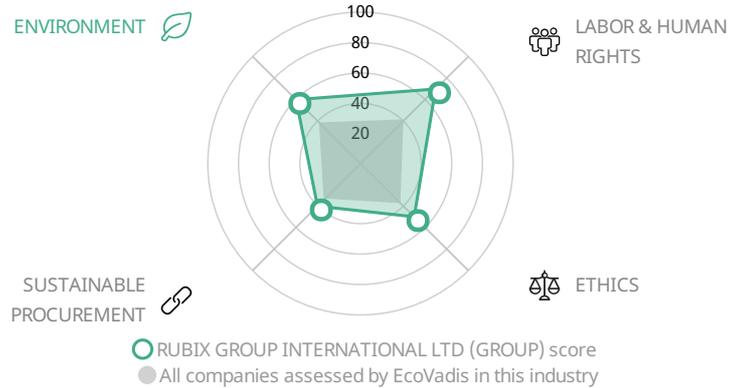
### Environment Score Breakdown



Theme score distribution



Theme score comparison



#### Environment: Activated Criteria

Because the questionnaire is customized by industry, size and location, not all 21 criteria are activated for every company and some criteria are weighted more heavily than others.

#### Environment: Strengths & Improvement Areas

The Corrective Action Plan is a collaborative feature designed to support companies' CSR performance improvement. It enables companies to build an improvement plan online, communicate planned and completed corrective actions and share feedback. Improvement areas with ongoing corrective actions are marked with labels below.

**Strengths (23)**

**Policies**

**Quantitative objectives set on some relevant issues [i.e. GHG emissions]**

**Information**

The company has defined and has formally communicated quantitative objectives (i.e. targets) with regard to the relevant environmental policy objectives.

**Guidance**

Quantitative objectives or targets on environmental issues are considered as fundamental elements of comprehensive policy mechanism. They provide a monitoring framework that helps establish whether policy objectives are being met, and highlight the progress towards set goals. Some examples of specific targets on this topic include quantitative objectives on issues such as energy consumption reduction. As policy elements, targets can be expressed in absolute or relative terms and must have a valid future deadline (i.e. by 2020 we commit to reduce our energy consumption by 20% from 2015 levels). Best practices are to issue valid quantitative objectives or targets for all relevant environmental issues in a particular industry sector. Download the How-to Guide on this topic here (in English).

**Environmental policy on some relevant issues [i.e. energy consumption & GHGs, waste]**

**Information**

The company has formalized statements, commitments, and operational objectives on the management and mitigation of its environmental footprint, focusing on some material issues. The existing policy does not cover all the major environmental issues the company is confronted with.

**Guidance**

A standard environmental policy integrates commitments and/or operational objectives on the main environmental risks the company faces. It is communicated to internal and external stakeholders through a formal dedicated document (e.g. QHSE Policy). A standard environmental policy contains qualitative objectives/commitments specific to those issues. The policy should also incorporate some of the following elements: scope of application, allocation of responsibilities, quantitative objectives (i.e. on energy consumption & GHG emissions and materials, chemicals & waste management), and review mechanisms. Download the How-to Guide on this topic here (in English).

**Endorsement of the United Nations Global Compact (UNGC)**

**Information**

The UN Global Compact is a strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption. The company is a formal signatory of this initiative.

**Guidance**

The United Nations Global Compact is a United Nations strategic policy initiative to encourage businesses worldwide to adopt sustainable and socially responsible policies, and to report on their implementation. Companies sign the initiative and then are required to provide overviews of their management system through a mandatory disclosure framework (annual publication of a Communication on Progress [COP]).

**Actions**

**Company-specific emergency preparedness and response procedure regarding customer health and safety**

**Measures to reduce CO2 emissions from transport**

**Reduction of energy consumption through technology or equipment upgrades**

**Formalized procedure related to materials / chemicals management (e.g. storing, handling, transportation)**

**Information**

The company demonstrates that it has a procedure in place related to materials/chemicals management (e.g. storing, handling, transportation) through supporting documentation.

**Guidance**

Procedural documents detail a company's control systems and/or processes, and assign responsibilities for tasks and actions. Procedures describe how policies that are implemented by the company will be put into action. They can be presented in form of checklists, instructions, flowcharts, etc. A typical procedure document should outline the issues at hand, employees or departments responsible for overseeing or implementing the procedure, and how the procedure is to be implemented (i.e. step-by-step). Examples of procedures related to materials/chemicals management could be: process to properly store or handle hazardous materials, training procedures relating to labling or transporting hazardous materials, etc.

**ISO 50001 certified**

**Information**

The company has provided a valid ISO 50001 certificate for at least one of its operational sites.

**Guidance**

ISO 50001:2011 specifies requirements for establishing, implementing, maintaining and improving an energy management system, whose purpose is to enable an organization to follow a systematic approach in achieving continual improvement of energy performance, including energy efficiency, energy use and consumption. The ISO 50001 standard, previously known as DIN EN 16001, was launched in June 2011. It is fully aligned with ISO 14001.

**Company specific awareness program toward customers on environmental issues**

**Information**

The company has implemented specific awareness programs toward customers on environmental issues.

**Guidance**

Such awareness programs can inform consumers on how their purchasing behaviours (of goods and services) have an impact on specific environmental factors. This company offers awareness programs or options to their customers directing them towards a more sustainable consumption behaviour.

**Monitoring of direct and indirect CO2 emissions**

**Information**

The company regularly tracks, keeps records, and periodically reviews its direct and indirect CO2 emissions.

**Guidance**

Direct CO2 emissions (e.g. coming from fuel consumption) include emissions from facilities, plants, property or assets that are owned or controlled by the company (also called Scope 1 emissions according to the GHG international protocol). Indirect CO2 emissions are a consequence of the activities of the company but occur at sources owned or controlled by another entity. According to the GHG international protocol, there are Scope 2 emissions (when coming from consumption of purchased electricity, heat or steam) and Scope 3 emissions (other indirect emissions such as transport-related activities in vehicles not owned or controlled by the reporting entity, outsources activities).

**Provision of services for reducing paper/carton consumption**

**Measures to reduce paper consumption**

**Information**

The company has implemented specific measures to reduce the consumption of paper related to its activities.

**Guidance**

Examples might include provision of online catalogue to clients, distribution and storage of documents electronically (e.g. bills, press release, staff awareness on 'need to print', setting printers to double side).

**Company specific recycle or reuse programs and promotion campaign**

**Safety Data Sheets (SDS) provided for some products**

**Information**

The company issues Material Safety Data Sheets (MSDS) for some products.

**Guidance**

Material Safety Data Sheets (MSDSs) are forms which contain detailed data regarding the chemical and physical properties of a particular substance. It is an important component of workplace safety. MSDSs are required when a substance or preparation is supplied to any user in the European Union when the substance or the preparation contains a chemical that is classified as a dangerous substance or a SVHC, PBT or vPvB. The MSDS sheets must be distributed by the manufacturer or distributor of the product.

**Provision of products with an eco-label**

**Information**

The company offers products to its clients that have an eco-label.

**Guidance**

Eco-labels can be national or international, proprietary labels (private, run by NGO, industry groups or combination of stakeholders) or governmental labels (public). Examples of eco-labels are: EU Eco-label, Blue angel, MSC (Marine Stewardship council), FSC (Forest Stewardship Council), and AB (French Agriculture Biologique).

**Measures implemented to use recycled packaging**

**Information**

The company has provided supporting documentation demonstrating that it uses recycled packaging

**Guidance**

The type and amount of materials the organization uses can indicate its dependence on natural resources. Sustainable packaging is a way to reduce this impact. By using recycled packaging, a company can reduce its dependence on natural resources. Some example of recycled packaging are post-consumer recycled paper or paper board cartons, upcycled cardboard packaging, etc.

**Regular training on work processes for labeling, storing, handling and transporting hazardous goods**

**Information**

The company has provided supporting documentation demonstrating that it provides regular training on work processes for labeling, storing, handling and transporting hazardous goods

**Guidance**

Proper labeling of hazardous substances might include alignment with the Globally Harmonized System (GHS) of Classification and Labeling of Chemicals or other regional schemes like TSCA, IESCS. The company may also train its employees regarding the proper storage and handling of hazardous goods, such as procedures to avoid accidental spills or instructions on the use of appropriate personal protective equipment (PPE) in the handling of hazardous goods. Transportation procedures might include checklists for loading/unloading hazardous goods or procedures in place to ensure that all necessary information is included on documents for consignment of hazardous goods.

**Use of renewable energies or purchase of green energy**

**Information**

The company has implemented a process to be able to use renewable energy on its site or to buy green energy from the electricity grid.

**Guidance**

Examples of renewable energy are solar power, wind power, hydroelectric energy, biomass, geothermal power, energy from tides/ocean. The company may have set up a contract with a provider of such type of energy, either a private company or an institutionalized organisation (e.g. the company is connected to the town / region grid which relies on wind power for electricity production).

**Measures to recycle paper/carton waste**

**Information**

The company has implemented specific measures to recycle waste made of paper and/or carton.

**Guidance**

Examples of such measures might include sorting paper and ensuring on-site re-use (e.g. with one-side printed pages), organising external collection by a specialist paper waste contractor or carton packaging collector.

**ISO 14001 certified (at least one operational site)**

**Information**

The company has provided a valid ISO 14001 certificate that covers at least one operating site

**Guidance**

ISO 14001 is the internationally recognised standard for the environmental management of businesses. It prescribes controls for those activities that have an effect on the environment. These include the use of natural resources, handling and treatment of waste and energy consumption. Organizations that implement ISO 14001 have a clear management structure with defined authority and responsibility, clear objectives for improvement, with measurable results and a structured approach to environmental impacts. This includes the monitoring of environmental system management failures, auditing of performance, and review of policies and objectives.

**Employee awareness/training program on energy conservation**

**Information**

The company has a specific awareness (and training) program for employees on reducing energy consumption.

**Guidance**

Awareness programs might include brochures given to employees, notices displayed in the workplace areas, presentation used during meetings in order to engage employees on reducing energy consumption. Some examples of areas it could cover include turning off lights at the end of the day, switching off electrical appliances when not in use, selecting energy-efficient equipment (e.g. for facilities management or procurement department staff), and optimizing machinery use (e.g. stand-by vs active for workshop operatives).

**Results**

**Reporting on total gross Scope 1 and 2 GHG emissions**

**Reporting on total energy consumption**

**Information**

The company has reported KPIs with regard to total energy consumption either through formal documentation or questionnaire declaration.

**Guidance**

Total energy consumed represents total primary energy consumption reported in kWh. Total energy consumed may include e.g. consumption of coal and coke (in Kg) reported in kWh and/or consumption of oil, LPG and electrical power in kWh.

**Improvement Areas (6)**

**Policies**

Medium

Inconclusive documentation or only basic policy on some relevant issues [i.e. customer health & safety, environmental services & advocacy]

**Information**

The company has either provided no supporting documentation on policies, or provided only basic policy statements that do not cover all the major environmental issues the company is confronted with, or has provided supporting evidence that was not approved due to quality/acceptance requirements. e.g. company name, recent date (8 years).

**Guidance**

A standard environmental policy integrates commitments and/or operational objectives on the main environmental risks the company faces. It is communicated to internal and external stakeholders through a formal dedicated document (e.g. QHSE Policy). A standard environmental policy contains qualitative objectives/commitments specific to those issues. The policy should also incorporate some of the following elements: scope of application, allocation of responsibilities, quantitative objectives (i.e. on energy consumption & GHG emissions and materials, chemicals & waste management), and review mechanisms. Download the How-to Guide on this topic here (in English).

**Actions**

Low

Declares a percentage of sites ISO 14001 certified, but certificates or evidence provided are inconclusive

**Information**

The company declares a percentage of ISO 14001 certified sites, however certificates or evidence (e.g. list of operational sites certified) provided are inconclusive.

**Guidance**

The ISO 14001 standard belongs to the ISO 14000 series, a family of environmental management standards developed by the International Organization for Standardization (ISO) designed to provide an internationally recognized framework for environmental management, measurement, evaluation and auditing. The standard serves as a framework to assist organizations in developing their own environmental management system and is based on the continuous Plan-Do-Check-Act cycle. The information provided in the supporting documentation (e.g. company website, CSR reporting) does not enable the identification of the percentage of ISO 14001 certified sites. Some examples of evidence used to demonstrate the coverage of ISO 14001 certifications include (but are not limited to): - Individual certificates for each certified site; - A certificate annex clearly stating each individual site covered by the certificate - A sample certificate for one site, along with formalized reporting in a third-party verified report (i.e. CSR Report, Annual Report), which includes the percentage of sites covered by the ISO 14001 certification, etc.

**Results**

High

Basic reporting on environmental issues

**Information**

There is some evidence of formal reporting on environmental issues in the supporting documentation. It may include key performance indicators (KPIs), or statistical figures. However reporting elements may be limited in terms of quality or quantity, may not cover the main issues, or reporting is not regularly updated.

**Guidance**

Based on the information provided for the assessment, reporting does not cover a major portion of relevant issues. To improve the quality of reporting, KPIs could include material issues for the company's environmental performance. For example, annual figures on electricity consumption and GHG emissions, waste management, or any other available KPIs. For more information on the specific environmental performance KPIs please refer to the GRI Standards. Download the How-to Guide on this topic here (in English).

Medium

No alignment with a widely recognized reporting standard (e.g. GRI, SASB)

Low

No external assurance of sustainability reporting

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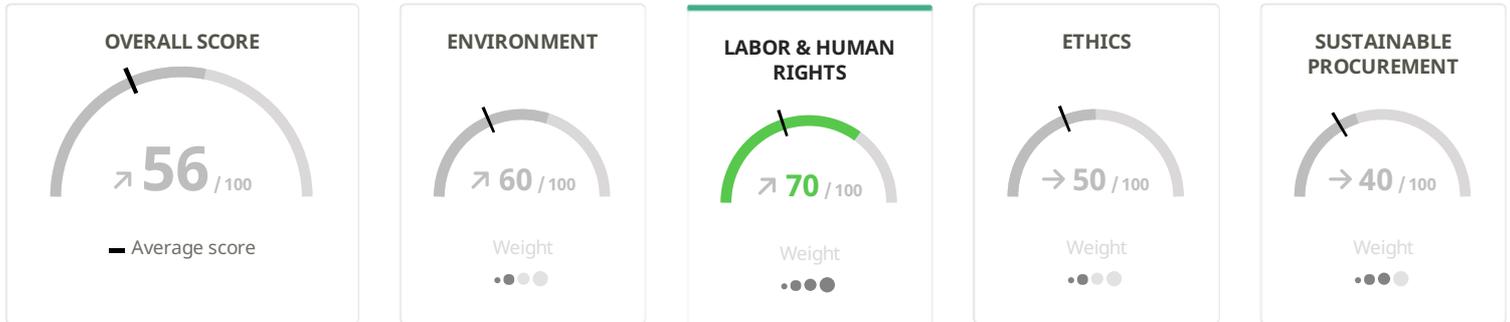
Low

No information on reporting on total weight of waste

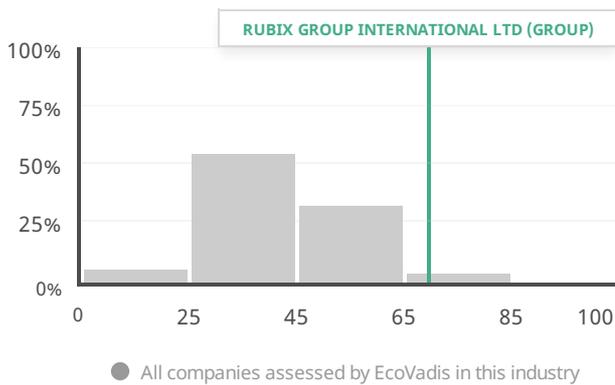
## 7. LABOR & HUMAN RIGHTS

This theme takes into account both internal human resources (e.g. health and safety, working conditions, career management) and human rights issues (e.g. discrimination and/or harassment, child labor).

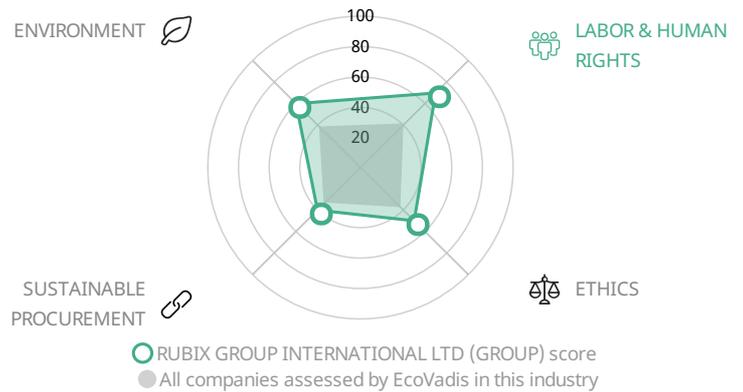
### Labor & Human Rights Score Breakdown



Theme score distribution



Theme score comparison



#### Labor & Human Rights: Activated Criteria

Because the questionnaire is customized by industry, size and location, not all 21 criteria are activated for every company and some criteria are weighted more heavily than others.

#### Labor & Human Rights: Strengths & Improvement Areas

The Corrective Action Plan is a collaborative feature designed to support companies' CSR performance improvement. It enables companies to build an improvement plan online, communicate planned and completed corrective actions and share feedback. Improvement areas with ongoing corrective actions are marked with labels below.



**Strengths (32)**

**Policies**

**Quantitative objectives set on some relevant issues [i.e. employee health & safety]**

**Information**

The company has defined and has formally communicated quantitative objectives (i.e. targets) with regard to the relevant labor practices policy objectives.

**Guidance**

Quantitative objectives or targets on labor and human rights issues are considered as fundamental elements of a comprehensive policy mechanism. They provide a monitoring framework that helps establish whether policy objectives are being met, and highlight the progress towards set goals. Some examples of specific targets on this topic include quantitative objectives on health & safety indicators (i.e. accident frequency and accident severity rates), and quantitative objectives on the percentage of employees trained on discrimination and/or harassment issues, among others. As policy elements, targets can be expressed in absolute or relative terms and must have a valid future deadline (i.e. by 2020 we commit to train 100% of employees on discrimination issues). To achieve the maximum score on the policies indicator, valid quantitative objectives or targets should be present for high importance CSR issues in this theme. Download the How-to Guide on this topic here (in English).

**Exceptional policies on major labor and human rights issues**

**Information**

The company has issued exceptional policies that integrate commitments, qualitative and quantitative objectives on all the labor and human rights issues the company is faced with. Additionally, exceptional policies have exhaustive organizational elements such as the allocation of responsibilities, mechanisms to deal with policy violations, formal review processes, and communication of the policy to all employees and business partners, etc.

**Guidance**

N/A

**Endorsement of the United Nations Global Compact (UNGC)**

**Information**

The UN Global Compact is a strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption. The company is a formal signatory of this initiative.

**Guidance**

The United Nations Global Compact is a United Nations strategic policy initiative to encourage businesses worldwide to adopt sustainable and socially responsible policies, and to report on their implementation. Companies sign the initiative and then are required to provide overviews of their management system through a mandatory disclosure framework (annual publication of a Communication on Progress [COP]).

**Actions**

**Additional leave beyond standard vacation days**

**Information**

The company has official measures to promote work-life balance in place, which have been found within the supporting documentation. The company provides additional leave beyond vacation days mandated by local regulations.

**Guidance**

The company has implemented working practices that acknowledge and aim to support the needs of staff in achieving a balance between their home and working lives. The company provides additional days of leave for employees, outside of standard vacation days mandated by regulations. Additional days of leave can include paternal leave, bereavement leave, jury duty, election day leave, and sabbatical leave.

**Employee satisfaction survey**

**Information**

The company conducts a survey to employees regarding satisfaction in the work environment.

**Guidance**

An employee satisfaction survey can be conducted by companies to gain information on how and if employees are satisfied in the work environment. The results of these surveys can be used by companies to get feedback on employees about their engagement, morale, and satisfaction at work.

**Childcare services or allowance**

**Information**

The company has official measures to promote work-life balance in place, which have been found within the supporting documentation. The company provides services and/or an allowance for child care.

**Guidance**

The company has implemented working practices that acknowledge and aim to support the needs of staff in achieving a balance between their home and working lives. The company provides an allowance to help employees cover the costs of child care, or the company provides services that can help employees who need child care during work hours for their children.

**Collective agreement on diversity, discrimination, and/or harassment**

**Information**

There is a collective agreement between an employer, its employees, and in accordance with national regulations regarding any of the following labor issues: employees' health & safety, working conditions, career management & training, discrimination and/or harassment.

**Guidance**

Social dialogue entails all types of negotiation, consultation or simply exchange of information between representatives of governments, employers and workers, on issues of common interest relating to economic and social policy. A collective agreement is an agreement in writing regarding working conditions and terms of employment concluded between an employer, on the one hand, and one or more representative workers' organizations, in accordance with national laws and regulations, on the other. Content of collective agreements should focus on the most important social dialogue topics; e.g. a collective agreement regarding discrimination and/or harassment.

**Collective agreement on working conditions**

**Collective agreement on employees' health & safety**

**Information**

There is a collective agreement between an employer, its employees, and in accordance with national regulations regarding any of the following labor issues: employees' health & safety, working conditions, career management & training, discrimination and/or harassment.

**Guidance**

Social dialogue entails all types of negotiation, consultation or simply exchange of information between representatives of governments, employers and workers, on issues of common interest relating to economic and social policy. A collective agreement is an agreement in writing regarding working conditions and terms of employment concluded between an employer, on the one hand, and one or more representative workers' organizations, in accordance with national laws and regulations, on the other. Content of collective agreements should focus on the most important social dialogue topics; e.g. a collective agreement regarding employees' health & safety.

**Flexible organization of work available to employees (e.g. remote work, flexitime)**

**Information**

The company has official measures to promote work-life balance in place, which have been found within the supporting documentation. The company provides flexible hours and organization for employees to work.

**Guidance**

The company has implemented working practices that acknowledge and aim to support the needs of staff in achieving a balance between their home and working lives. The company has supporting documentation showing a flexible organization of working hours is provided for employees, which can include evidence of options for part-time work, telecommuting or remote work, job-shares, and other forms of variable work schedules.

**Health care coverage of employees in place**

**Whistleblower procedure on discrimination and harassment**

**Information**

The company has implemented a formal whistleblower procedure which encourages employees (and external stakeholders) to report potential violations of the company's discrimination and/or harassment policies.

**Guidance**

Employees can report on areas such as violations of the company's discrimination and/or harassment policy (e.g. on hiring, remuneration, training, promotion) through anonymous and secure communication channels. In addition, non-retaliation is ensured.

**Specific labor or human rights certification [i.e. equal pay management system]**

**Information**

The assessed company has a specific labor and human rights management system certificate.

**Guidance**

Specific labor and human rights management system certificates include AFAQ 26000, Intertek's Workplace Conditions Assessment Achievement Award, LUCIE, etc.

**Employee representatives or employee representative body (e.g. works council)**

**Information**

The company has implemented representation for employees in the form of elected employee representatives or a representative body.

**Guidance**

Social dialogue entails all types of negotiation, consultation or simply exchange of information between representatives of governments, employers and workers, on issues of common interest relating to economic and social policy. Employee representatives can include representatives who are freely elected by the workers of the company in accordance with provisions of national laws, or any union, works council or other agency or representative body recognized for the purposes of bargaining collectively on behalf of any employee. They are the point of contact between the workforce and management. They can/must be consulted by management on certain topics (e.g. collective redundancy).

**External audits on health & safety issues**

**Information**

External audits on health & safety issues are carried out on the company premises

**Guidance**

Audits of the operational health and safety management system are conducted by an external third party in order to determine whether the management system complies with legal requirements or specific standards the company wishes to adhere to. External audits are done to review and evaluate the performance and effectiveness of procedures in place, and are useful to expose gaps in the effective implementation of the health and safety management system.

**Specific measures on discrimination issues**

**Information**

The company has implemented specific actions concerning discrimination issues

**Guidance**

Discrimination is defined as different treatment given to people in hiring, remuneration, training, promotion, and termination which is based on race, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation or age (source: ISO 26000). Some examples of actions taken by companies to mitigate the risk of discrimination include training for managers on the subject, implementation of whistle blowing procedures, disciplinary measures and other specific measures for integration of people with disabilities, senior employees and women.

**Safety Checklist for Contractors certified (SCC certified) [i.e. VCA]**

**Information**

The company has provided a valid Safety Checklist Contractor certified (SCC certified) certificate for at least one of its operational sites or business units.

**Guidance**

The Safety Checklist for Contractors (SCC) is a standard for evaluating and certifying safety management systems. This certification shows that the subcontractor's internal processes have been measured against best practices in safety management of hazardous work and found compliant. The standard was originally developed for the oil industry, but is currently also used in other sectors. The benefits of a SCC system include expansion of the supplier assessment system by safety aspects, improvement of the health and safety conduct of large-scale industry contractors, higher motivation of the employees by means of clearer organization and responsibilities, improved legal safety through proof of fulfillment of legal requirements and reduction of costs through improved work safety.

**Employee health & safety detailed risk assessment**

**Information**

The company carries out employee health & safety detailed risk assessments

**Guidance**

The company has carried out detailed risk assessment of health and safety. Occupational health and safety risk assessments are a crucial step in the prevention process. They involve the identification of all the potential hazards an employee may face while carrying out regular duties and which type of employees may be more exposed to hazards (by job function). The level of risk, records of significant findings and proposition of preventive actions are also highlighted, in addition to plans for regular review of the risk assessment. If applicable, the results of a health and safety risk assessment should be made available to relevant stakeholders such as employees, members of the health and safety committee, staff representatives, the occupational physicians, and labor inspectors.

**Transparent recruitment process communicated clearly and formally to all candidates**

**Information**

The company has a transparent recruitment process in place which is clearly and formally communicated to all candidates

**Guidance**

The company has a transparent hiring process in place which is communicated to all candidates. This includes, but is not limited to: having a clear job description, a process in place to respond to applicants after an interview, notification to candidates on potential background checks, etc. An open, transparent, and merit-based recruitment process ensures equal opportunities to the job applicants, free of any direct or indirect discrimination.

**Measures to prevent discrimination during recruitment phase**

**Information**

The company has proactive measures in place to avoid discrimination during the recruitment phase

**Guidance**

Discrimination is defined as different treatment given to people in hiring, remuneration, training, promotion, and termination. Discrimination can be based on race, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation or age (source: ISO 26000). Some examples of measures to prevent discrimination during the recruitment phase are: to have a predefined procedure covering the selection process, to establish a pre-determined and non-discriminatory role profile for the open position based on skills competencies which the successful applicant must meet, and to encourage diversity amongst applicants.

**Regular assessment (at least once a year) of individual performance**

**Information**

The company carries out regular assessments or appraisal of individual performance at least on a yearly basis for employees

**Guidance**

The company has implemented regular assessment of employee performance. Regular assessments of employees aim to evaluate employee individual performance and productivity, combining both written and oral elements, and are based on a systematic and periodic process linked with a pre-established criteria and organizational objectives. The best practice concerning this criteria is to have a review with the employee at least annually, and to include employee self-assessments aimed at maintaining employee engagement in their own performance and overall organizational objectives. Setting and measuring goals related to the employee's career objectives, as well as including manager and peer feedback on the employee's performance are all important components in this regular assessment process.

**Mandatory health check-up for employees**

**Information**

The company provides general mandatory health check-up for employees

**Guidance**

The company carries out mandatory health check-up for its employees. Within the scope of health check ups, the mental and physical states of employees are investigated to ascertain the status of the employee's health related to the job function, and in particular to identify any negative work-related effects on employees. According to the International Labor Organization (ILO), it is recommended that a health check up for employees is carried out within thirty days from the first day the employee is employed and the subsequent health check up conducted at least once a year by a licensed medical practitioner, especially for manufacturing companies presenting high health and safety risks for employees.

**Official measures to anticipate or reduce layoffs and associated negative impacts (e.g. financial compensation, outplacement service)**

**Information**

The company implements official measures to anticipate or reduce layoffs and any eventual associated negative impacts from the layoff.

**Guidance**

For example, training or assistance can be provided to employees before laying them off to maintain and/or improve their skills and to maximize their prospects for reemployment. Companies can also provide workers with adequate notice in advance of a layoff, ensure that unemployment insurance benefits are widely available, and can provide a combination of guidance, technical assistance and support to ensure the exit process is smooth for all parties.

**Provision of skills development training**

**Information**

The company provides training to its employees to develop their skills

**Guidance**

The company has implemented vocational training and instruction, which include skills development training, education paid for in whole or in part by the company, with the goal to provide opportunities for career advancement (Source: Global Reporting Initiative G3). Examples of on-the-job training to enhance employee skills are coaching, mentoring, job rotation, apprenticeships, etc. Total number of hours of training per employee per year can be a significant key performance indicator for this action.

**Measures to prevent on-site substance use**

**Information**

The company has implemented measures to prevent on-site substance abuse

**Guidance**

Some potential measures include the development of a substance abuse policy, training through websites, seminars, or a refresher course, testing programs and disciplinary measures.

**ISO 45001/OHSAS 18001 certified (at least one operational site)**

**Information**

The company has provided a valid OHSAS 18001 certificate that covers at least one but not all of its operations.

**Guidance**

OHSAS 18001 is an international standard for occupational health and safety management systems. It addresses employee health and safety issues and involves an external audit on the facilities' health & safety conditions. Organizations that implement OHSAS 18001 have a clear management structure with defined authority and responsibility, clear objectives for improvement, with measurable results and a structured approach to risk assessment. This includes the monitoring of health and safety management failures, auditing of performance and review of policies and objectives.

**Joint labor management health & safety committee in operation**

**Information**

The company has a joint labor management health & safety committee in place

**Guidance**

It is important to have a committee in place composed of both workforce and management personnel dedicated to address the health and safety risks faced by employees (Source: International Labor Organization (ILO), 1929). These committees identify potential health and safety issues and offer timely and effective solutions to continuously improve workplace safety. Regular (monthly) inspections are recommended. For French companies, it is commonly known as the "Comité d'hygiène, de sécurité et des conditions de travail (CHSCT)" and it is mandatory for companies with more than 50 employees.

**Specific measures implemented for the integration of employees with disabilities**

**Information**

The company has implemented specific measures to integrate disabled persons into the workforce.

**Guidance**

Emerging studies determine that there is a true business case for the integration of disabled employees into the workforce beyond its roots as a socially responsible business practice. Evidence states that disabled employees have comparable productivity rates, lower accident rates, and higher job retention trends. People with disabilities also represent an untapped source of skills and talent, including technical skills if they have access to training and transferable problem-solving skills developed in daily life. Hiring disabled employees can contribute to the overall diversity, creativity and workplace morale. Some potential examples of implementation measures could include specific outreach techniques and programs, the provision of reasonable accommodation to meet individual needs, and allocating designated human resources management staff with knowledge on disadvantaged or work-related disability issues, etc. (source: ILO)

**Setting of individual career plan for all employees**

**Information**

The company has implemented mechanisms to help employees in setting individual career plans

**Guidance**

Career planning is an ongoing process that can help employees manage their learning and development/progress within the company. It is also a key component of a company's attraction and retention strategy. The company has mechanisms in place to provide career opportunities to employees, allowing them to access to promotions and higher pay. For example, an individual development plan can be put in place by analyzing skills and competencies needed by the employees to achieve their short, mid and long term goals. This process should also be coupled with the annual review process of the employee.

**Training of relevant employees on health & safety risks and best working practices**

**Information**

The company provides training to relevant employees on health and safety risks and best working practices

**Guidance**

The company has implemented training on health and safety issues. Safety training aims at implementing health and safety procedures into specific job practices and at raising staff awareness and skills to an acceptable standard. For example, safety training covers topics such as accident prevention and safety promotion, safety compliance, use of personal protective equipment, chemical and hazardous materials safety, and workplace emergency response procedures. A best practice is to have a training matrix which helps to keep track of which employees have been trained, the date of the training, the training topic, and expected dates for refresher trainings. Monitoring of training attendance certificates is also suggested. It is also a best practice to have the training carried out in the language that the employees understand best and to carry out tests or quizzes to ensure training concepts have been successfully transmitted to participants.

**Results**

**Reporting on the percentage of women in top executive positions**

**Information**

The company reports, either through formal documentation or questionnaire declaration, on the percentage of women in executive positions (e.g. senior or top management).

**Guidance**

Executive positions include positions such as chief financial officers, chief operating officers, or any other key roles in a company. The aim is to look into whether a company is promoting an increase in gender diversity in its executive rank or not. It is important to note that in 2015, only 14.2% of the top five leadership positions in companies in the S&P500 are held by women according to CNNMoney analysis.

**Standard reporting on labor and human rights issues**

**Information**

There is evidence of formal reporting implemented regarding both labor and human rights issues from the company supporting documentation, including key performance indicators (KPIs), statistical figures or associated concrete actions.

**Guidance**

Reporting items are standard in terms of quality and quantity, do cover the main issues, are meaningful enough, and are regularly updated. KPIs may include (but are not limited to): accident frequency and severity rates, the percentage of employees covered by collective bargaining agreements, skills development trainings, and percentage of employees trained on discrimination issues. Comprehensive reporting on labor practice and human rights issues will additionally have KPIs reported in a formal public document available to stakeholders, and will be in compliance with the Global Reporting Initiative guidelines or other external CSR reporting standards. Download the How-to Guide on this topic here (in English).

**Improvement Areas (6)**

**Actions**

**Low** Declares a percentage of sites ISO 45001/OHSAS 18001 certified, but certificates or evidence provided are inconclusive

**Information**

The company declares that a certain percentage of sites are OHSAS 18001 certified, however this claim could not be verified within the supporting documentation (e.g. missing annex list of operational sites certified).

**Guidance**

The information found provided in the supporting documentation (e.g. company website, CSR reporting) does not allow to identify the percentage of OHSAS 18001 certified sites. The OHSAS 18001 certification addresses employee health and safety issues and involves an external audit on the facilities' health & safety conditions. Some examples of evidence used to demonstrate the coverage of such certificates include (but are not limited to): - Individual certificates for each certified site; - A certificate annex clearly stating each individual site covered by the certificate - A sample certificate for one site, along with formalized reporting in a third-party verified report (i.e. CSR Report, Annual Report), which includes the percentage of sites covered by the specific health & safety certification, etc.

**Results**

**Medium** No alignment with a widely recognized reporting standard (e.g. GRI, SASB)

**Low** No external assurance of sustainability reporting

**Low** Declares reporting on accident frequency rate, but no supporting documentation available

**Low** Declares reporting on accident severity rate, but no supporting documentation available

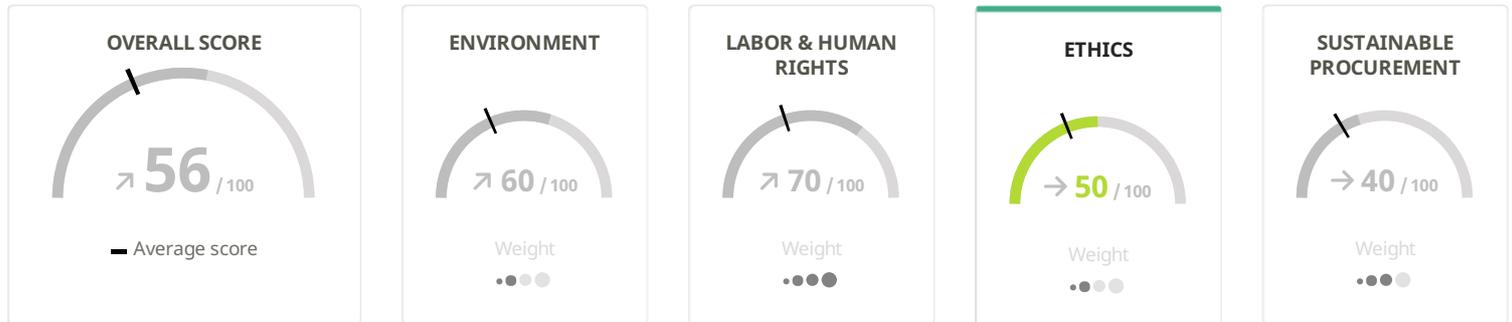
Low

No information on reporting on training hours per employee

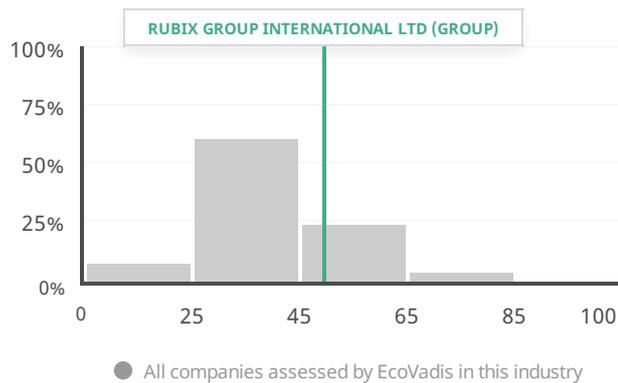
## 8. ETHICS

This theme focuses primarily on corruption and bribery issues, and also takes into account anticompetitive practices and responsible information management.

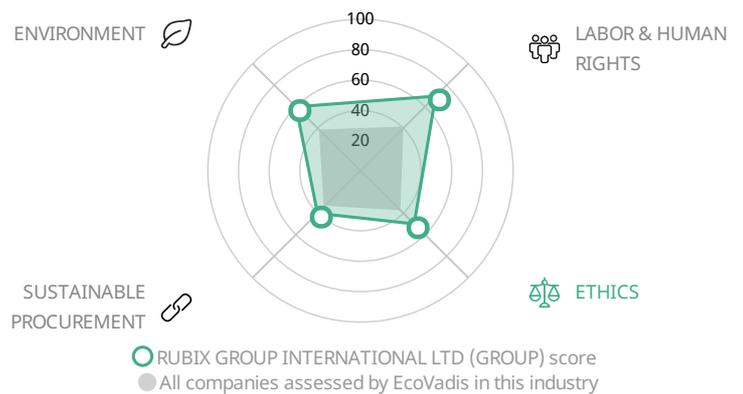
### Ethics Score Breakdown



Theme score distribution



Theme score comparison



#### Ethics: Activated Criteria

Because the questionnaire is customized by industry, size and location, not all 21 criteria are activated for every company and some criteria are weighted more heavily than others.

#### Ethics: Strengths & Improvement Areas

The Corrective Action Plan is a collaborative feature designed to support companies' CSR performance improvement. It enables companies to build an improvement plan online, communicate planned and completed corrective actions and share feedback. Improvement areas with ongoing corrective actions are marked with labels below.

**Strengths (15)**

**Policies**

**Disciplinary sanctions to deal with policy violations**

**Information**

There is evidence within the supporting documentation provided that the company has implemented structured mechanisms to deal with policy violations such as disciplinary actions.

**Guidance**

In order to ensure the adequate implementation of business ethics policies, companies should establish procedures to administer investigations and sanction employees for eventual violations (i.e. disciplinary measures up to and including possible termination).

**Dedicated responsibility for ethics issues**

**Comprehensive policies on ethics issues**

**Information**

A comprehensive policy on business ethics issues integrates commitments and/or operational objectives on all or almost all of the main fair business practices issues a company is confronted with: namely corruption & bribery issues, and information security and responsible marketing if applicable. It is also compulsory to have additional elements such as formal mechanism to communicate on business ethics, scope of the policy's application and allocation of responsibilities, among others.

**Guidance**

Policies are deemed exceptional when all business ethics issues are covered by qualitative and quantitative objectives. Additionally, an exceptional policy has exhaustive organizational elements such as allocation of responsibilities, mechanisms to deal with policy violations, formal review process, communication of the policy to all employees and business partners, etc. Download the How-to Guide on this topic here (in English).

**Endorsement of the United Nations Global Compact (UNGC)**

**Information**

The UN Global Compact is a strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption. The company is a formal signatory of this initiative.

**Guidance**

The United Nations Global Compact is a United Nations strategic policy initiative to encourage businesses worldwide to adopt sustainable and socially responsible policies, and to report on their implementation. Companies sign the initiative and then are required to provide overviews of their management system through a mandatory disclosure framework (annual publication of a Communication on Progress [COP]).

**Actions**

**Incident response procedure (IRP) to manage breaches of confidential information**

**Whistleblower procedure to report ethics issues**

**Information**

The company has implemented a formal whistleblower procedure which encourages employees (and external stakeholders) to report potential violations of the company's business ethics policies.

**Guidance**

A whistleblower procedure is a grievance mechanism for stakeholders to report any wrongdoings, concerns or breaches of the company business ethics policies. An effective whistleblower procedure must provide stakeholders with an identified communication channel to report their concerns, as well as protect the whistleblowers' confidentiality and rights to non-retaliation. The procedure may also be handled by a third party.

**Implementation of a records retention schedule**

**Periodic information security risk assessments performed**

**Information**

The company carries out periodic risk assessments on responsible information security management.

**Guidance**

Risk assessments are a formal process of evaluating and predicting the consequences (positive or negative) of a hazard and their likelihoods/probabilities. Periodic risk assessments on information security allow a company to identify potential information security risks, rate the likely occurrence and the potential impact of the risks, identify security controls, and develop an action plan. Such assessments ensure the presence of a strong compliance program and help to develop a more robust approach to counter breaches in information security management within the organization.

**Audits of control procedures to prevent information security breaches**

**Information**

The company's information security policies and compliance mechanisms are regularly audited.

**Guidance**

Internal controls (for examples four-eyes principle, job rotations, among others) are necessary to regularly monitor the effectiveness and proper implementation of actions put in place to support the responsible information management policies. Periodic audits of those controls, done either through an external third party that performs business ethics audits or an internal audit team, should be carried out to ensure their effectiveness and provide reasonable assurance that internal processes are being adhered to.

**Awareness training to prevent information security breaches**

**Information**

The company has delivered awareness trainings to employees on information security issues.

**Guidance**

Information management is the process of collecting, storing, managing and maintaining information securely in all its forms. Through the use of rigorous information management practices, companies can help maintain their credibility and confidence of consumers. Awareness or trainings on such practices are regularly conducted to ensure that employees are familiar with the company's information management policy and procedures. They may be conducted either online or in person, and should include regular testing to ensure the training effectiveness.

**Periodic corruption risk assessments performed**

**Information**

The company carries out periodic corruption & bribery risk assessments.

**Guidance**

Risk assessment are a formal process of evaluating and predicting the consequences (positive or negative) of a hazard and their likelihoods/probabilities. Periodic corruption and bribery risk assessments allow a company to identify potential bribery and corruption risks, rate the likely occurrence and the potential impact of the risks, select the appropriate anti-corruption controls, and develop an action plan. Such assessments ensure the presence of a strong compliance program and help to develop a more robust approach to counter bribery and corruption activities by the organization.

**Audits of control procedures to prevent corruption**

**Information**

The company's anti-corruption and bribery policies and compliance mechanisms are regularly audited.

**Guidance**

Internal controls (for example four-eyes principle, job rotations, among others) are necessary to regularly monitor the effectiveness and proper implementation of actions put in place to support anti-corruption and bribery policies. Periodic audits of those controls, done either through an external third party that performs business ethics audits or an internal audit team, should be carried out to ensure their effectiveness and provide reasonable assurance that internal processes are being adhered to.

**Awareness training performed to prevent corruption**

**Information**

The company has implemented awareness or training program on anti-corruption and bribery issues for its employees.

**Guidance**

According to the ISO 26000 guideline, "Corruption can be defined as the abuse of entrusted power for private gain". There are all forms of public and proprietary corruption in the workplace, including among other things extortion, bribery, conflict of interest, fraud, money laundering. Since corruption undermines a company's effectiveness and ethical reputation, awareness or trainings on anti-corruption & bribery issues are regularly conducted to ensure that employees are familiar with the company's policy and procedures. They may be conducted either online or in person, and should include regular testing to ensure the training effectiveness.

**Third party anti-corruption due diligence program in place**

**Information**

The company has implemented systematic compliance and due-diligence measures when dealing with third-party intermediaries (i.e. commission agents, brokers, sales representatives, distributors, contractors, customs brokers, consultants) acting on its behalf.

**Guidance**

According to the Organization for Economic Cooperation and Development (OECD), third-party intermediaries (third parties) are people who help connect two or more trading partners, generally as "a conduit for goods or services offered by a supplier to a consumer. With globalization, there is now an increasing use of third parties. However, while companies benefit from the skills and resources of the intermediaries, they also become more vulnerable to risks such as bribery and corruption, conflict of interests, reputational damage, etc. Companies should therefore put in place compliance controls such as third-party due diligence procedures, training, certification, etc. to mitigate potential corruption risks.

**Specific approval procedure for sensitive transactions (e.g. gifts, travel)**

**Information**

The company has implemented a verification process for sensitive transactions.

**Guidance**

Sensitive transactions are a broad range of business dealings considered to be either illegal, unethical, or to reflect adversely on the integrity of the company. Some examples include (non-exhaustive) kickbacks, bribes, payoffs to influence decision affective a company's operations, etc. However, such transactions also comprise of facilitation payments which is usually made with the intention of expediting an administrative process. As such, a verification procedure is put in place to review and approve any sensitive transactions.

**Improvement Areas (6)**

**Actions**

**High** No supporting documentation on the coverage of ethics actions throughout the company operations

**Information**

There is insufficient or inconclusive evidence within supporting documentation on the level of deployment of business ethics actions throughout the company.

**Guidance**

Companies with more than 1000 employees and/or more than one operational site (such as manufacturing plants, offices, divisions, branches) have inherently greater potential CSR risks and impacts. Therefore, the coverage/ deployment of actions and certifications are important as a higher level of deployment provides higher assurance of an effective, company-wide CSR management system. Some examples of proxies used to determine the level of deployment of actions within the ethics theme (non-exhaustive) are % of the total workforce who received training on business ethics issues, % of all operational sites with an information security management system (ISMS) certified to ISO 27000 (or other equivalent/similar standard), % of all operational sites with certified anti-corruption management system etc.

**Medium** No supporting documentation regarding awareness trainings on anti-competitive practices

**Information**

No company declaration and no evidence within the supporting documentation regarding the implementation of awareness trainings on fair competition practices.

**Guidance**

Anti-competitive behavior occur when companies agree to prevent, restrict or distort their competition to the detriment of other suppliers and consumers. Anticompetitive practices include activities like price fixing, exclusionary exclusive dealing contracts, imposing minimum resale prices, etc. To promote fair competition, awareness or trainings on anti-competitive issues are regularly conducted to ensure that employees are familiar with the company's policy and procedures. They may be conducted either online or in person, and should include regular testing to ensure the training effectiveness.

**Medium** No supporting documentation regarding third party due diligence on information security

**Results**

**High** Basic reporting on ethics issues

**Information**

There is some evidence of formal reporting on business ethics issues in the supporting documentation. It may include key performance indicators (KPIs), or statistical figures. However reporting elements may be limited in terms of quality or quantity, may not cover the main issues, or reporting is not regularly updated.

**Guidance**

Based on the information provided for the assessment, reporting does not cover a major portion of relevant issues. To improve the quality of reporting, KPIs could include material issues for the companies' business ethics performance. For example, the number of breaches of the Code of Ethics or number of incidents reported through the whistleblower procedure. They also could include percentage of employees trained in organization's anti-corruption policies and procedures, total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes (Source: Global Reporting Initiative G3). Download the How-to Guide on this topic here (in English).

**Medium** No alignment with a widely recognized reporting standard (e.g. GRI, SASB)

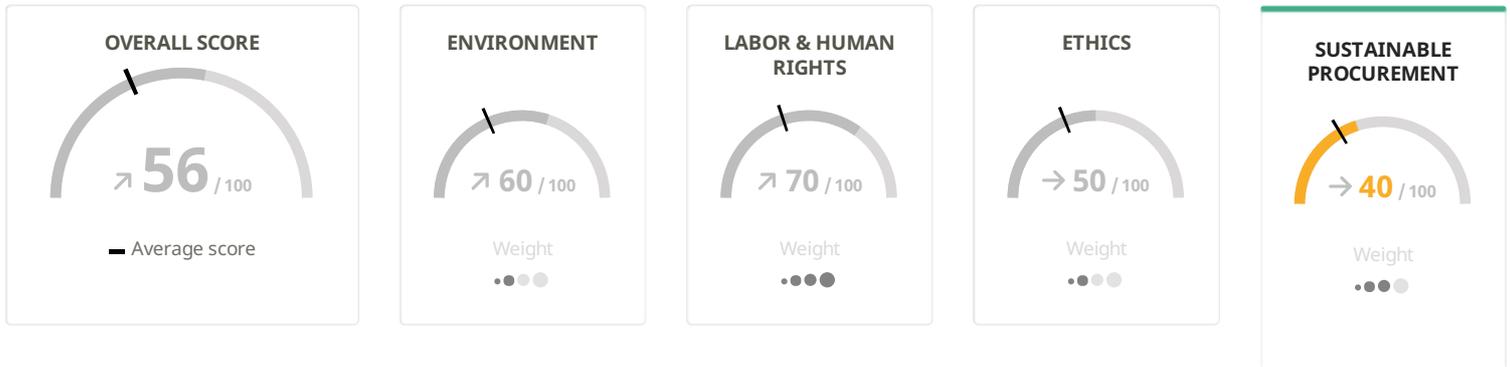
Low

No external assurance of sustainability reporting

## 9. SUSTAINABLE PROCUREMENT

This theme focuses on both social and environmental issues within the company supply chain.

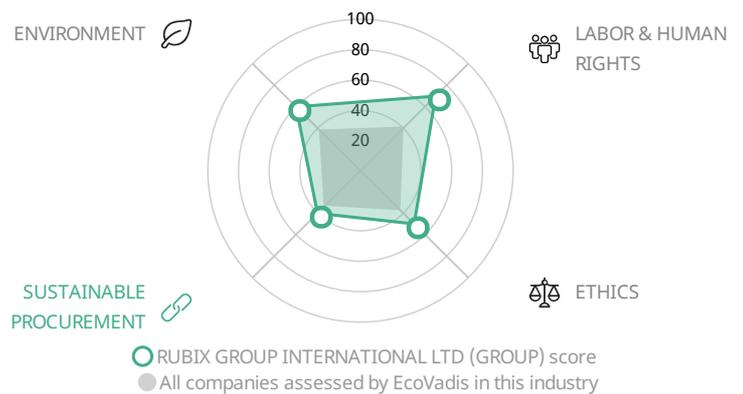
### Sustainable Procurement Score Breakdown



Theme score distribution



Theme score comparison



#### Sustainable Procurement: Activated Criteria

Because the questionnaire is customized by industry, size and location, not all 21 criteria are activated for every company and some criteria are weighted more heavily than others.

#### Sustainable Procurement: Strengths & Improvement Areas

The Corrective Action Plan is a collaborative feature designed to support companies' CSR performance improvement. It enables companies to build an improvement plan online, communicate planned and completed corrective actions and share feedback. Improvement areas with ongoing corrective actions are marked with labels below.



**Strengths (5)**

**Policies**

**Sustainable procurement policies on both supplier environmental and social practices**

**Information**

The company has formalized statements, commitments, and/or operational objectives on the management of its sustainable procurement policies. The existing policy covers both environmental and social factors that the company may be confronted with.

**Guidance**

The standard sustainable procurement policy includes commitments and/or operational objectives on all material sourcing risks the company faces. It is communicated to internal and external stakeholders through a formal dedicated document. A comprehensive sustainable procurement policy also includes additional organizational elements such as a regular review mechanisms, an allocation of responsibilities, and a clearly defined scope of application. Download the How-to Guide on this topic here (in English).

**Actions**

**Supplier CSR code of conduct in place**

**Information**

The company has issued a specific Supplier Code of Conduct which lists the minimum requirements on environmental, labor and business ethics issues to be followed by its suppliers or subcontractors.

**Guidance**

A supplier Code of Conduct aims to ensure that suppliers provide safe working conditions for their employees, respect fair business ethics practices to comply with rules and regulations and reduce environmental impacts caused by their operations, among other issues. Typically, suppliers are required to uphold the standards in a Code of Conduct in order to continue in a business relationship with their client (i.e. the company undergoing the EcoVadis evaluation).

**Integration of social or environmental clauses into supplier contracts**

**Information**

The company provides evidence in supporting documentation that social and/or environmental clauses are included in the contractual agreements with its suppliers.

**Guidance**

Contracts including clauses on CSR are used to ensure that suppliers have the ability, capacity and commitment to meet the sustainability requirements of the company. The clauses can include: specific targets or Key Performance Indicators (KPIs) to be achieved and/or minimum performance standards on varying CSR issues. If a supplier violates the conditions of the contract clauses, sanctions or penalties (up to and including contract termination) can be imposed by the company (undergoing the EcoVadis evaluation).

**Results**

**Reporting on Scope 3 emissions**

**Declares using no tin, tantalum, tungsten, gold, and/or their derivatives [Not verified]**

**Information**

The company declares no use of tin, tantalum, tungsten, gold and/or their derivatives.

**Guidance**

Tin, tantalum, tungsten and gold (3TG) (often called 'Conflict Minerals'), are natural resources whose systematic exploitation and trade can result in serious violations or abuses of international human rights. The topic of sourcing from conflict zones such as the Democratic Republic of Congo (DRC) has faced increasing attention in recent years from international government, industry and non-governmental groups with the aim of bringing about awareness and international legal frameworks on Conflict Minerals. In July 2010, in response to these concerns, the United States Congress enacted legislation that requires certain public companies to publicly disclose their use of conflict minerals emanating from the DRC and nine adjoining countries. Section 1502 of the Dodd Frank Act requires companies to disclose if any of the 3TG minerals are "necessary to the functionality or production of a product" manufactured by those companies. Although the law is restricted to companies listed on a U.S. Stock Exchange, transparency on due diligence mechanisms has become necessary for a range of companies in the value chain in order to trace back the origin of the minerals (e.g. 1st tier, 2nd tier suppliers) and respond to their client's inquiries. Various industry groups such as the Conflict-Free Sourcing Initiative (GeSI and EICC) have developed reporting templates and programs intended to support companies in their public declarations on Conflict Minerals.

**Improvement Areas (7)**

**Actions**

**High** No supporting documentation on the coverage of sustainable procurement actions throughout the company supplier base/operations

**Information**

There is insufficient or inconclusive evidence within supporting documentation on the level of deployment of sustainable procurement actions throughout the company.

**Guidance**

Companies shall demonstrate that their sustainable procurement management system is deployed across its buyers and supplier base. The buyers within the assessment scope may include those associated to operational sites including facilities such as manufacturing plants, offices, divisions, branches, and those of subsidiaries, across all the company's geographic locations. The supplier base may include all providers of products and services to the assessment scope, encompassing any level of risk and/or spend. Some examples of evidence used to determine effective deployment of a sustainable procurement management system's actions and certifications include (but are not limited to): - % of targeted suppliers who have signed the supplier code of conduct - % of targeted contracts that include clauses on environmental, labor, human rights, and ethics requirements - % of all buyers across all locations who received training on sustainable procurement - % of targeted suppliers who have gone through a CSR assessment

**High** No information on CSR risk analysis being conducted (i.e. prior to supplier assessments or audits)

Medium

Declares on-site audit of suppliers on environmental or social issues, but no supporting documentation available

**Information**

The company declares audits of suppliers are conducted based specifically on environmental and/or social criteria. However, no information was found on this topic in the supporting documentation.

**Guidance**

Some potential examples of measures could include internal audits of suppliers on environmental and/or social issues either conducted by the company, or by a certified third-party (i.e. third-party audit certificates are accepted).

Medium

Declares assessment of suppliers (e.g. questionnaire) on environmental or social practices, but no supporting documentation available

**Information**

The company declares it has implemented CSR assessments of suppliers through questionnaires in order to verify the compliance with its own requirements, but no information was found on this topic within the supporting documentation.

**Guidance**

CSR assessment questionnaires can be in-house driven or supported by a third-party organization, and include questions on environmental (including regulatory issues), social and ethical issues.

**Results**

Medium

Basic reporting on sustainable procurement issues

**Information**

There is some evidence of formal reporting on sustainable procurement issues in the supporting documentation. It may include key performance indicators (KPIs), or statistical figures. However reporting elements may be limited in terms of quality or quantity, may not cover the main issues, or reporting is not regularly updated.

**Guidance**

Based on the information provided for the assessment, reporting does not cover a major portion of relevant issues. To improve the quality of reporting, KPIs could be sector-specific and include for instance: % of suppliers assessed or audited on CSR issues, % of buyers trained on sustainable procurement, % of raw materials purchased that are recycled materials, % of products purchased with an eco-label (Source: Global Reporting Initiative G3). Download the How-to Guide on this topic here (in English).

Medium

No alignment with a widely recognized reporting standard (e.g. GRI, SASB)

Low

No external assurance of sustainability reporting

## 10. 360° WATCH FINDINGS

<p><b>14 February 2019</b></p> <p><b>FO défend le pouvoir d'achat des salariés de chez Brammer</b></p> <p><a href="http://www.force-ouvriere.fr/fo-defend-le-pouvoir-d-achat-des-salaries-de-chez-brammer?lang=fr">http://www.force-ouvriere.fr/fo-defend-le-pouvoir-d-achat-des-salaries-de-chez-brammer?lang=fr</a></p> <p>Après 2 ans sans augmentation générale et une perte de pouvoir d'achat de 3 %, les syndicats FO et CGT majoritaires chez Brammer revendiquent 100 euros d'augmentation pour tous les salariés. Cette augmentation qui rentre dans le budget prévu par la direction, permet de retrouver le pouvoir d'achat perdu et de réduire les écarts de salaires très importants dans l'entreprise. Face au refus de la direction de négocier sur cette base, les syndicats FO et CGT ont déclenché un mouvement de grève le jeudi 14 février.</p> <p> Labor &amp; Human Rights → No score impact</p>	<p><b>15 July 2015</b></p> <p><b>In Safe Hands: BSIF Award For Brammer And The Royal Mint</b></p> <p><a href="http://www.connectingindustry.com/ProcessControl/in-safe-hands-bsif-award-for-brammer-and-the-royal-mint.aspx">http://www.connectingindustry.com/ProcessControl/in-safe-hands-bsif-award-for-brammer-and-the-royal-mint.aspx</a></p> <p>A project by Brammer and The Royal Mint to rationalise the use of safety gloves on site and ensure compatibility and safety for employees has been recognised for its success by the UK's leading health &amp; safety industry body.</p> <p> Labor &amp; Human Rights → No score impact</p>	<p><b>15 May 2015</b></p> <p><b>Brammer To Cut 170 Jobs</b></p> <p><a href="https://www.insidermedia.com/insider/northwest/139532-brammer-cut-170-jobs">https://www.insidermedia.com/insider/northwest/139532-brammer-cut-170-jobs</a></p> <p>Manchester-headquartered Brammer is to shed 170 jobs across the business as part of a £5m cost cutting drive following a "slower than anticipated start to the year".</p> <p> Labor &amp; Human Rights → No score impact</p>
<p><b>5 March 2020</b></p> <p><b>No records found for this company on Compliance Database</b></p> <p>null</p> <p>→ No score impact</p>		

360° Watch Findings comprise relevant public information about companies' CSR practices that have been identified via more than 2,500 data sources (including NGOs, press and trade unions). 360° Watch Findings are incorporated into the EcoVadis assessment and can have positive, negative or no score impact.

### EcoVadis is connected to the following international sources:

- CSR networks and initiatives (e.g. AccountAbility, Business for Social Responsibility, CSR Europe)
- Trade unions and employers' organizations
- International organization (e.g. United Nations, European Court of Human Rights, Global Compact, International Labor Organization, World Bank)
- NGOs (e.g. China Labor Watch, Greenpeace, WWF, Movimento Difesa del Cittadino)
- Research institutes and specialized press (e.g. CSR Asia, Blacksmith Institute, Corpwatch)

## 11. SPECIFIC COMMENTS

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Additional comments from our CSR analysts pertaining to the assessment.

### Specific comments

-  The company is not included in any compliance-related watch lists or sanction lists.

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-  Some supporting documents were considered too outdated to be included in this assessment.

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-  The implementation coverage of CSR measures and actions throughout the company is unclear.

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-  Despite the company implementing measures regarding environmental issues, policies are not formalized or are only basic.

## 12. CONTACT US

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Any questions or need help? Visit our Help Center at [support.ecovadis.com](https://support.ecovadis.com)

# APPENDIX:

## INDUSTRY RISK PROFILE

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Discover the primary CSR risks, regulations, hot topics and best practices related to specific industries.

EcoVadis determines industry based on the International Standard Industrial Classification of All Economic Activities (ISIC), which is a compilation of all global economic activities published by the United Nations Statistical Commission. Its main purpose is to provide a set of activity categories that can be utilized for the collection and reporting of statistics according to such activities.

It is possible that a company has operations in more than one industry. In these cases, EcoVadis classifies companies based on their main area of operation, as determined by CSR risk and/or total revenue.

## CRITERIA ACTIVATION BY THEME:

Discover the primary CSR risks, regulations, hot topics and best practices related to specific industries.

### Environment

Medium	Energy consumption & GHGs
Non-activated	Water
Non-activated	Biodiversity
Non-activated	Local & Accidental Pollution
Medium	Materials, Chemicals & Waste
Non-activated	Product Use
Non-activated	Product End-of-Life
High	Customer Health & Safety
Medium	Environmental Services & Advocacy

### Labor & Human Rights

High	Employee Health & Safety
Medium	Working Conditions
Medium	Social Dialogue
Medium	Career Management & Training
Non-activated	Child Labor, Forced Labor & Human Trafficking
Medium	Diversity, Discrimination & Harassment
High	External Stakeholder Human Rights

### Ethics

Medium	Corruption
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Non-activated

Anticompetitive Practices

Non-activated

Responsible Information Management

**Sustainable Procurement**



High

Supplier Environmental Practices

High

Supplier Social Practices

## KEY CSR ISSUES

Find qualitative explanations of the key CSR issues and risk associated with Wholesale of other machinery and equipment

### Environment

Importance CSR issue

Medium

Energy consumption & GHGs

#### Definition

Energy consumption (e.g. electricity, fuel, renewable energies) used during operations and transport. Greenhouse gases direct and indirect emissions including CO2, CH4, N2O, HFC, PFC and SF6. Also includes production of renewable energy by the company.

Medium

Materials, Chemicals & Waste

#### Definition

Consumption of all types of raw materials and chemicals. Non-hazardous and hazardous waste generated from operations. Also includes air emissions other than GHG (e.g. SOx, NOx).

High

Customer Health & Safety

#### Definition

Negative health and safety impacts of products and services on customers or consumers.

Medium

Environmental Services & Advocacy

#### Definition

Programs implemented to promote the sustainable consumption of their own products or services among their customer base. This criteria includes the positive/negative indirect impacts of the use of products and services.

### Labor & Human Rights

Importance CSR issue

High

Employee Health & Safety

#### Definition

Deals with health and safety issues encountered by employees at work i.e. during operations and transport. Includes both physiological and psychological issues arising from, among others, dangerous equipment, work practices and hazardous substance.

Medium

Working Conditions

**Definition**

Deals with working hours, remunerations and social benefits granted to employees.

Medium

Social Dialogue

**Definition**

Deals with structured social dialogue i.e. social dialog deployed through recognized employee representatives and collective bargaining.

Medium

Career Management & Training

**Definition**

Deals with main career stages i.e. recruitment, evaluation, training and management of layoffs.

Medium

Diversity, Discrimination & Harassment

**Definition**

Deals with discrimination and harassment prevention at the workplace. Discrimination is defined as different treatment given to people in hiring, remuneration, training, promotion, termination; based on race, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation or age. Harassment may include physical, psychological and verbal abuse in the work environment.

High

External Stakeholder Human Rights

**Definition**

Deals with the prevention of direct and indirect human rights impacts of the companys operations on external stakeholders. External stakeholder human rights include any of the inherent rights outlined in the UN Universal Declaration on Human Rights, such as rights to property/land, rights to self-determination, rights to safety/security etc.



Ethics

Importance

CSR issue

Medium

Corruption

**Definition**

Deals with all forms of corruption issues at work, including among other things extortion, bribery, conflict of interest, fraud, money laundering.



Sustainable Procurement

Importance

CSR issue

High

Supplier Environmental Practices

**Definition**

Deals with environmental issues within the supply chain i.e. environmental impacts generated from the suppliers and subcontractors own operations and products.

High

Supplier Social Practices

**Definition**

Deals with labor practices and human rights issues within the supply chain i.e. labor practices and human rights issues generated from the suppliers and subcontractors own operations or products.

CSR KPIs Overview

KPI	All companies assessed by EcoVadis in this industry
<b>Active whistleblowing procedure in place</b>	31%
<b>Audit or assessment of suppliers on CSR issues</b>	27%
<b>Carbon disclosure project (CDP) respondent</b>	5%
<b>Formal code of business ethics OUTDATED</b>	45%
<b>Global Compact Signatory</b>	9%
<b>ISO 14001 certified (at least one operational site)</b>	30%
<b>OHSAS 18001/ISO 45001 certification or equivalent (at least one operational site)</b>	20%
<b>Policy on sustainable procurement issues</b>	21%
<b>Reporting on energy consumption or GHGs</b>	35%
<b>Reporting on health &amp; safety indicators</b>	31%

## Main Regulations and Initiatives

### World Fair Trade Organization

[http://www.wfto.com/index.php?option=com\\_frontpage&Itemid=1](http://www.wfto.com/index.php?option=com_frontpage&Itemid=1)

Developing the WFTO Fair Trade System as an affordable guarantee system focused on organizational Fair Trade compliance

 **Ethics**

### RoHS II

[http://ec.europa.eu/enterprise/policies/european-standards/harmonised-standards/restriction-of-hazardous-substances/index\\_en.htm](http://ec.europa.eu/enterprise/policies/european-standards/harmonised-standards/restriction-of-hazardous-substances/index_en.htm)

 Regulatory

The RoHS directive restricts the use of six hazardous materials in the manufacture of various types of electronic and electrical equipment.

 **Environment**

### International Partnership for Premiums and Gifts (IPPAG )Cooperative Code of Conduct

<http://www.ippag.net/corporatecitizenship>

IPPAG Cooperative is made up of over 20 market leading promotional item wholesalers and distributors spread across the world

 **Labor & Human Rights**

### SA8000

<http://www.sa-intl.org/index.cfm?fuseaction=Page.ViewPage&PageID=937>

Social certification standards for decent workplaces, across all industrial sectors.

 **Labor & Human Rights**

### Standard ISO 14000 (International Standard Organisation)

[http://www.iso.org/iso/iso\\_14000\\_essentials](http://www.iso.org/iso/iso_14000_essentials)

The ISO 14000 family addresses various aspects of environmental management

 **Environment**

### REACH

[http://ec.europa.eu/environment/chemicals/reach/reach\\_intro.htm](http://ec.europa.eu/environment/chemicals/reach/reach_intro.htm)

 Regulatory

The European Union regulation REACH (18 December 2006) encourages manufacturers and importers of "Substances of Very High Concern" to pre-register them.

 **Environment**

### Energy Star

[http://www.energystar.gov/index.cfm?fuseaction=find\\_a\\_product](http://www.energystar.gov/index.cfm?fuseaction=find_a_product)

Provides a system for rating the energy efficiency of products

 **Environment**

### Business and Institutional Furniture Manufacturer's Association, USA

<http://www.bifma.org/?page=JoinUsII>

Not-for-profit trade association involving standards development and maintenance of office furniture product safety and performance standards

 **Environment**

### GS1

<http://www.gs1.org/about/overview>

GS1 is an international not-for-profit association working towards improving the efficiency and visibility of supply and demand chains globally and across sectors

 **Sustainable Procurement**

### Universal Declaration of Human Rights

<http://www.un.org/Overview/rights.html>

 Regulatory

The Universal Declaration of Human Rights (UDHR) is an advisory declaration adopted by the United Nations General Assembly (10 December 1948 )

 **Labor & Human Rights**

**International Labor Organization's Fundamental Conventions**

[http://www.ilo.org/wcmsp5/groups/public/--ed\\_norm/--declaration/documents/publication/wcms\\_095895.pdf](http://www.ilo.org/wcmsp5/groups/public/--ed_norm/--declaration/documents/publication/wcms_095895.pdf)

 Regulatory

The Governing Body of the International Labour Office has identified eight Conventions as fundamental to the rights of human beings at work. These rights are a precondition for 12 the others in that they provide a necessary framework from which to strive freely for the improvement of individual and collective conditions of work.

 **Labor & Human Rights**

**Foreign Corrupt Practices Act of 1977**

<http://www.usdoj.gov/criminal/fraud/fcpa/>

 Regulatory

The Foreign Corrupt Practices Act of 1977 (FCPA) prohibits payments, gifts, or Practices Act contributions to officials or employees of any foreign government or government-owned business for the purpose of getting or retaining business.

 **Ethics**

**United Nations Global Compact (10 principles)**

<http://www.unglobalcompact.org/AboutTheGC/TheTenPrinciples/index.html>

The Global Compact asks companies to embrace, support and enact, within their sphere of influence, a set of ten principles in the areas of human rights, labour standards, the environment, and anti-corruption:

 **All themes**

**Standard Global Reporting Initiative's (GRI)**

<http://www.globalreporting.org/Home>

The GRI is a network-based organization, that has set out the principles and indicators that organizations can use to measure and report their economic, environmental, and social performance.

 **All themes**

**Carbon disclosure project**

<https://www.cdp.net>

CDP is an international, not-for-profit organization providing the only global system for companies and cities to measure, disclose, manage and share vital environmental information.

 **Environment**

**Standard OHSAS 18001 (Occupational Health and Safety Assessment Series)**

<http://www.ohsas-18001-occupational-health-and-safety.com/index.htm>

OHSAS 18000 is an international occupational health and safety management system specification.

 **Labor & Human Rights**

**United Nations Convention against Corruption (UNCAC)**

<http://www.unodc.org/unodc/en/treaties/CAC/index.html>

 Regulatory

The UNCAC is the first leg12y binding international anti-corruption instrument. In its 8 Chapters and 71 Articles, the UNCAC obliges its States Parties to implement a wide and detailed range of anti-corruption measures affecting their laws, institutions and practices.

 **Ethics**

**OECD guidelines for multinational enterprises**

[http://www.oecd.org/about/0,2337,en\\_2649\\_34889\\_1\\_1\\_1\\_1\\_1,100.html](http://www.oecd.org/about/0,2337,en_2649_34889_1_1_1_1_1,100.html)

The Guidelines are recommendations addressed by governments to multinational enterprises operating in or from adhering countries. They provide voluntary principles and standards for responsible business conduct in a variety of areas including employment and industrial relations, human rights, environment, information disclosure, combating bribery, consumer interests, science and technology, competition, and taxation.

 **All themes**

**Standard ISO 26000 (International Standard Organisation)**

<http://www.iso.org/iso/pressrelease.htm?refid=Ref972>

The future International Standard ISO 26000, Guidance on social responsibility, will provide harmonized, glob12y relevant guidance based on international consensus among expert representatives of the main stakeholder groups and so encourage the implementation of best practice in social responsibility worldwide.

 **All themes**