

# QUARTERLY ENGAGEMENT REPORT

## Q1 2017





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This report summarises the shareholder engagement activities that GES has performed on behalf of Erste Asset Management during the first quarter of 2017.



# ABOUT ERSTE ASSET MANAGEMENT

Erste Asset Management is an international asset management company with a strong position in Central and Eastern Europe. Our activities are backed by the financial strength of Erste Group Bank AG.

We offer our clients a broad spectrum of high-quality investment funds and asset management solutions. We apply the highest quality to our clients' assets. This also goes for the comprehensive risk management of Erste Asset Management, which covers all our business areas.

Erste Asset Management attaches particular importance to providing responsible products and services. As a company we have dedicated ourselves to socially and environmentally agreeable behaviour.

We are proud of our employees and have become the employer of choice for specialists who wish to prove their talent in the various departments of Erste Asset Management.

## OUR APPROACH

In principle, the sustainability approach of Erste Asset Management is based on a three-dimensional structure. The dimensions of criteria definition, best-in-class and engagement / active ownership mutually enhance each other within an integrated process. A variety of approaches to sustainable investments are combined in this way in order to join somewhat restrictive elements with active, positive and dialog-based elements.

The dialog with the companies and the use of our own voting rights lie at the core of our active ownership policy. In both cases, the engagement serves to improve the future viability of the companies. Moreover, the engagement results are integrated into the company selection as well.

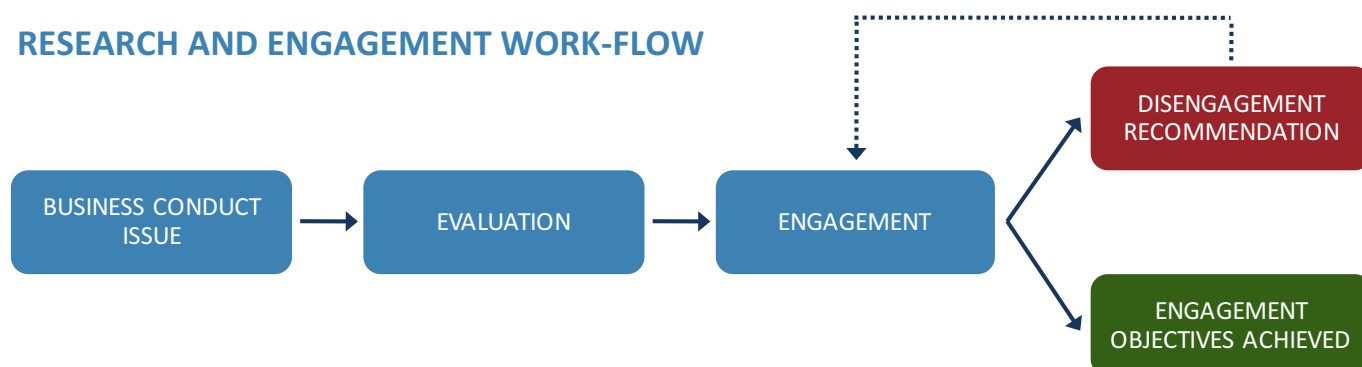
We believe that changes in business conduct drives changes in corporate value. Consequently, we seek to instigate changes in business conduct through engagement dialogue where deemed necessary.

We engage with companies in collaboration with our service provider GES. The engagement process is based on the findings from a systematic screening of companies regarding their compliance with well-established international conventions and guidelines on environmental, social and governance (ESG) issues. By way of example this includes:

- UN Global Compact
- OECD Guidelines for Multinational Enterprises
- Human rights conventions
- Environmental conventions

We will start engagement with companies that are, or have been involved in systematic business conduct issues or, an isolated issue that has severe consequences for the environment or humans.

### RESEARCH AND ENGAGEMENT WORK-FLOW



# ENGAGEMENT BRIEF

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### L3 TECHNOLOGIES INC

*Separated from past events*

GES has archived a case on **L3 TECHNOLOGIES INC** (L3). The background is quite complex but the essence is that the company is no longer associated with the original incidents. The incidents took place in units purchased by L3 and the bulk, if not all, of the incidents occurred prior to L3's purchases. These entities were sold off in 2012 and L3 has since not entered the type of business that was the cause of the problems. Substantial time has now passed and GES has not recorded any similar allegations after the sale of the problematic operations. L3 is therefore no longer exposed to risks that would motivate the previously sought after changes in management systems and policies.

For several years, L3 Technologies Inc. (formerly L-3 Communications), was in the spotlight due to the purchase of two companies which provided services to the **US ARMY**. L3 was accused of, and faced several lawsuits, related to human rights violations in Iraq and Croatia. The company **MPRI** was bought by L3 in 2002. MPRI was allegedly involved in genocide in Krajina, Croatia in 1995. According to the displaced ethnic Serbs who sued the company, MPRI assisted the Croatian military in designing and carrying out a military campaign named "Operation Storm" in the region in August 1995. **TITAN**, at the time the largest provider of translators and interpreters to the US military, was bought by L3 in July 2005. About a year earlier, a military investigation described several instances (including in Abu Ghraib in Iraq) and practices of an abusive nature in which Titan employees were allegedly involved. These incidents included detainees being "assaulted, abused and forced to strip off their clothing and perform indecent acts on each other".

There were a number of court cases against L3 as a consequence of the services provided by Titan in Iraq and MPRI in Croatia. Several lawsuits were dismissed in 2011 or ruled in favour of Titan. Also, L3's unit for services, which included the former MPRI and Titan, were spun off as **ENGILITY** in 2012. In January 2013, Engility settled one of the cases and agreed to pay USD 5.28 million to 71 former inmates held at Abu Ghraib between 2003

and 2007. In September 2014, the **US DISTRICT COURT** in a memorandum opinion and order dismissed the international law allegations related to Croatia.

Both the incidents in Iraq and Croatia ended a decade ago or longer. Given that Titan and MPRI were both acquired by L3 after the incidents occurred and that the provision of services was later sold off as a separate entity, L3 is no longer associated with these incidents. L3 has not showed any sign of returning to providing services like those provided by MPRI, Titan and Engility. This indicates that the sale of the service units was a normal change in focus and not primarily a defensive action against the lawsuits. Also, there have been no reports registered by GES of human rights violations since 2012. GES has decided to archive the case instead of resolving it due to the time passed in combination with no particular risk exposure and no reported human rights issues.

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For further information, please contact:



**Flemming Hedén**

*Senior Engagement Manager*

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### STARBUCKS CORP.

*Anti-union practices – resolved*

After three years of engaging with **STARBUCKS CORP.** (Starbucks), GES now regards the case on anti-union practices in Chile as resolved. In 2012, the **CHILEAN SUPREME COURT** fined the Chilean branch of Starbucks for discrediting and firing union leaders, giving false information to workers to avoid strikes, and altering working hours and shifts to hamper voting to strike. The court's verdict required Starbucks to pay a total of USD 50,000 for four different anti-union practices and to sign a collective agreement with the **STARBUCKS WORKERS UNION** in Chile.

In October 2013, the Starbucks Workers Union in Chile alleged that Starbucks Corp. refused to seek an agreement validating the union within the



## GES BUSINESS CONDUCT ENGAGEMENT

company, and was sentenced by the Chilean Supreme Court. According to the union, the company had also made public that it would not negotiate any of the points suggested by the union. The company confirmed to GES that it had decided to decline the union's new collective agreement proposal, without elaborating why.

This led the union to file an **OECD** complaint to the **CHILEAN NATIONAL CONTACT POINT** in May 2014. After some time, both parties agreed to mediation led by the NCP. The case was closed in June 2015, with the NCP giving a set of recommendations to the company. Shortly after the case was closed, the situation improved as the parties announced that they had reached a collective agreement which included wage increases and monthly financial contributions from the company towards union-organised social activities. This agreement was reached independently of the NCP, which updated in the second half of 2015 its Final Statement to note surprise at the sudden turn-around.



*Starbucks outlet in Santiago de Chile*

However, in 2016 the union alleged further anti-union practices from Starbucks' side resulting in a new court case. The ruling came out in favour of Starbucks late 2016, stating that the company had not violated any regulations on union law. With this development, there are no outstanding issues in relation to the company.

In the dialogue with GES, Starbucks discussed its Global Human Rights Policy and its implementation in global operations. With regards

to the situation in Chile, the company has not been able to comment in detail but stated that it considered the collective agreement reached with the union a success. According to the company, it respects its employees' right to affiliate with a union and to voice their opinions and works cooperatively in a manner consistent with its mission statement and guidelines. However, GES will still encourage Starbucks to further improve transparency.

Due to the signing of the collective agreement between Starbucks and the Starbucks Workers Union, GES assesses the company's response to the situation to be satisfactory and regards the case as resolved.

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## DAKOTA ACCESS PIPELINE

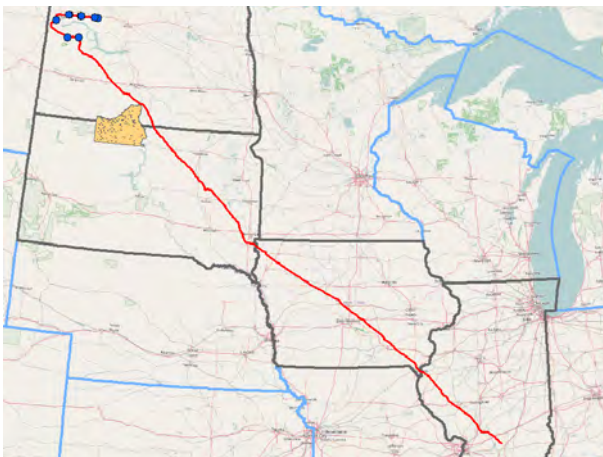
*Analysis, engagement and next steps*

In September 2016, the **OFFICE OF THE HIGH COMMISSIONER FOR HUMAN RIGHTS** (OHCHR) stated that the US Dakota Access Pipeline project (DAPL) poses significant risks to the Standing Rock Sioux tribe. The pipeline is being developed by **ENERGY TRANSFER PARTNERS** and **SUNOCO LOGISTICS PARTNERS**, subsidiaries of **ENERGY TRANSFER EQUITY LP**, to transport crude oil from oil fields in North Dakota to Illinois. Sunoco Logistics Partners and Energy Transfer Partners together have 38.25 per cent ownership in the project. The remaining partners include **PHILLIPS 66**, which owns 25 per cent of the project, and **ENBRIDGE ENERGY PARTNERS LP**, an affiliate of **ENBRIDGE**, with a 27.6 per cent stake.

The pipeline is planned to pass close to the tribe's reservation and beneath the Missouri River, the reservation's main source of drinking water. The

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pipeline risks include polluting the water and destroying burial grounds and sacred sites. It has also been alleged that the tribe has not been properly consulted and has not given its consent to the current routing of the pipeline. The project has been approved by regulatory agencies in all four states where it will operate. In February 2017, the **US ARMY CORPS OF ENGINEERS**, the US authority which issues permits for the part of the pipeline crossing federal land, granted the final permit needed to complete it.



*DAPL map. Standing Rock reservation in yellow.*

GES is in dialogue with Phillips 66 and Enbridge which, in short, both state they trust sufficient measures have been taken by Energy Transfer Partners in managing environmental and social concerns related to the project and that all necessary permits are in place to complete it. GES has, several times, reached out to Energy Transfer Partners, Energy Transfer Equity and Sunoco Logistics Partners, so far without success. A co-signed investor letter has also been sent to the three companies, to which the companies are yet to respond. Due to the lack of response, GES has shared the letter with the 17 largest lenders to the project, encouraging them to use their leverage towards the three companies.

Going forward, GES will focus the engagement on strengthening the DAPL-owners' human rights due diligence process by suggesting improvements related to human rights policies, human rights assessments as a part of project planning and implementation processes, as well as the implementation of formalised onsite grievance mechanisms for people affected by future projects. Should Standing Rock show a willingness

to engage in direct dialogue with the DAPL-owners on how similar situations can be avoided in the future, GES would encourage the companies to take such an opportunity to engage with the tribe.

After a review process that included consultations with an external expert on indigenous peoples' rights, GES has concluded that the DAPL-owners (Energy Transfer Partners, Sunoco Logistics Partners, Energy Transfer Equity LP, Phillips 66, Enbridge Energy Partners LP and Enbridge) can be linked to a violation of international norms by their involvement in DAPL. This is mainly based on the statements of the UN Special Rapporteur on the rights of indigenous peoples noting that the DAPL threatens to destroy the Standing Rock Sioux Tribe's burial grounds and sacred sites.

The right to maintain cultural manifestations such as historical sites and artefacts is protected under Article 11.1 of the UN Declaration on the Rights of Indigenous Peoples. Moreover, according to Article 7.3 of the International Labour Organization's Convention 169 on Indigenous and Tribal Peoples, studies should be carried out in co-operation with the indigenous peoples concerned to assess the social, spiritual, cultural and environmental impact of planned projects. The results of these studies shall be considered as fundamental criteria for the implementation of these activities. The UN Special Rapporteur stated that the Standing Rock Sioux Tribe was excluded from consultations at the planning stage of the project and denied access to information. The case can be linked to SDG 6 on clean water and sanitation, as the pipeline poses contamination risks of Standing Rock's drinking water.

Contribution to Sustainable Development Goal(s):



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## GES BUSINESS CONDUCT ENGAGEMENT

### KGHM

*Recurring accidents, upgraded to engage*

GES initially opened an evaluate case on **KGHM POLSKA MIEDŹ SA** (KGHM) in 2013, following two years of rising fatality numbers. The case was archived after the introduction of a new health & safety programme by KGHM. GES continued to monitor the company and the number of fatalities remained relatively static until 2016, when the company suffered seven separate fatal accidents with 19 associated casualties. Based upon this significant increase GES decided to upgrade the case to engage in January 2017.

The latest accident in November 2016, was the worst in KGHM's history with eight miners killed as a result of a tremor. The workers were in an area identified as being of "moderate risk".

In 2014, KGHM introduced a uniform health & safety policy – "A programme to improve work safety at KGHM Polska Miedź SA to 2020". The program is reportedly based on the best practices from its subsidiaries. The programme's main targets include: reducing the "lost time injury frequency rate" and improving the safety culture and the quality of training.

In engaging with the company, GES is addressing UN SDG 8 on decent work and economic growth, particularly target 8.8 on the promotion "of safe and secure working environments for all workers". GES wishes to engage upon the implementation of KGHM's health and safety programme, its method of risk assessment and whether additional measures are required as a result of these accidents.

Contribution to Sustainable Development Goal(s):



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### NESTLÉ

*Addressing labour issues in its supply chain*

Over the last two years, GES has been engaging with **NESTLÉ** over allegations of improper labour conditions in the company's seafood supply chain in Thailand. Through constructive dialogue, GES has learnt about actions the company has taken to address the issue.

In November 2015, Nestlé published an action plan presenting its commitment to eliminating labour and human rights abuses in the seafood supply chain in the country. It included a number of actions tailored to protect workers from abuse, to improve working conditions and to eliminate practices including juvenile/underage work on fishing vessels.



*Thai fishing vessel*

Traceability is a crucial element in identifying and eliminating human and labour rights abuses. Hence, in cooperation with its suppliers, the **THAI GOVERNMENT** and **THAILAND'S SHRIMP SUSTAINABLE SUPPLY CHAIN TASK FORCE**, Nestlé has performed traceability tests to verify the origin of finished goods right back to the fishing vessels and farms where they were caught and processed. Currently, over 99 per cent of the seafood ingredients that Nestlé sources from Thailand are traceable back to fishing vessels and farms.

Moreover, Nestlé, its main supplier **THAI UNION GROUP**, and the non-governmental organisation **VERITÉ** are working actively with the Thai Government and **THAILAND'S DEPARTMENT OF FISHERIES** to develop a practical training programme. The main goal is to educate vessel owners, boat captains, and crew members on living and working conditions aboard a fishing vessel and on workers' rights in Thailand.

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The Thai government will equip suppliers with a tool for improving both the availability and the impact of the training. Nestlé and Thai Union Group will contribute to the renovation costs of a typical fishing vessel and to the costs of the training, including setting up facilities, and providing equipment and worker kits. Nestlé recently met with all of partners involved in the initiative, a design of the vessel was approved, renovations are underway, and deployment is expected in 2017.

As another improvement driver, the company has decided to provide workers with a new reporting channel. Nestlé's suppliers are now working with **ISSARA INSTITUTE**, an organisation specialising in worker voice and grievance mechanisms, to provide information on the locations that form part of the supply chain for Nestlé's products. Issara is now in the process of visiting these sites in order to implement its Labour Monitoring Programme.

Undoubtedly, Nestlé has shown its commitment in addressing labour issues in the supply chain. However, the company still needs to ensure effective implementation of its Supplier Code of Conduct. Also, progress should be reported publicly, together with information about challenges and failures identified during independent third party assessments. GES will continue its dialogue with the company to monitor for further developments in closing out such gaps. In doing so, GES is promoting UN Sustainable Development Goal number 8 that aims to protect labour rights and ensure safe and secure working environments for all workers.

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## NINTENDO, SHENMAO, ZTE

*New engage cases – introducing tin mining issue*

Since 2013, GES has been assessing companies which are mining, processing and buying tin and tin-products from the islands of Bangka and Belitung (BB) in Indonesia, where the process has a severe negative impact on both the environment and local communities. Recently, GES upgraded to engage three ongoing tin mining cases – on **NINTENDO**, **SHENMAO** and **ZTE** – due to the severity of the situation and the lack of transparency in acknowledging and addressing the issue in a responsible manner.

It is reported that 90 per cent of tin in Indonesia is sourced from Bangka and Belitung, and Indonesia is the world's second-largest exporter of the metal. Tin is used as solder in phones and electronic devices. On average, four grams of Indonesian tin goes into most of the world's tablet computers, and two grams goes into most smartphones.

In 2012, a media investigation into tin mining in Bangka found links between tin mining companies, solder making manufacturers and buyers of tin, and the devastating effects that the operations have on both the environment and local communities. This led to further investigations by the media and NGOs and the creation of the multi-stakeholder initiative **IDH INDONESIAN TIN WORKING GROUP** (TWG) which aims to improve the situation.

Based on the reporting, GES opened cases on companies which were involved in the practice. Several of the companies assessed by GES have joined the TWG and embraced their responsibility for the situation. The initiative has been working on multiple levels towards finding solution to the negative effects of tin mining in BB. For the last three years, the TWG has undertaken situational analysis and sustainability assessments, and launched the action plan to support responsible practices. The TWG has also met with local stakeholders as well as with the Indonesian government to encourage improvements. GES decided to close the cases on **APPLE** and **PHILIPS**, among nine other companies, which acknowledged their responsibility and addressed

## GES BUSINESS CONDUCT ENGAGEMENT

the situation. Moreover, GES has been in contact with the TWG and discussed the initiative's work and findings. However, a proper assessment of the situation and suggestions on how to improve have been very challenging. This is due to both weak Indonesian legislation and the fact that mining is the primary source of income for local communities. Both islands are dominated by mines and besides mining there is almost no other possibilities for work.

Despite GES' many attempts to engage in a meaningful conversation with Nintendo, Shenmao and ZTE to understand the companies' position on tin mining, none of the companies have been able to provide information on how they will address, manage and improve the tin mining issue.

To consider a company supportive of responsible tin sourcing, GES will acknowledge the following approach:

- collaborating with the government of Indonesia towards harmonising the legal and policy framework, particularly to address the challenges around artisanal and small scale miners;
- developing and implementing guidelines or standards of responsible mining industry practices as well as assurance mechanisms;
- working towards improved equitable revenue governance from tin mining to support responsible practices;
- minimising the environmental impact from mining and smelting;
- enabling the socioeconomic development of the BB community through responsible business practices; and
- lessening dependency on tin.

After several years of intensive work by the TWG, the Roadmap of Sustainable Tin Mining Operations in Indonesia and the Incentives Guide for companies were published in 2016. The goal of the incentives is "to support, engage and drive the upstream industry in Indonesia towards more responsible practices, in addition to, and in support of the efforts already underway within the roadmap". The Roadmap contains information on the status of collaboration with the official bodies and the local stakeholders. It explains the

main challenges in prompting the responsible sourcing mechanisms, and clarifies that the key question in the ongoing discussion over the definition of responsible mining is still unanswered. As of today, there is no definition, methodology, processes or criteria for responsibly mined tin.



*Miners in Bangka, Indonesia*

However, the Incentives Guide advises on what should be considered more responsible sourcing:

- active participation in the TWG and/or public support of TWG projects;
- transparency about tin sourcing and admittance that the company's products might contain tin from BB;
- publishing a statement of taking responsibility for tin sourcing;
- communicating tin sourcing requirements to suppliers. The company should communicate its expectations and demands on responsible tin sourcing through codes of conduct, standards, policies, statements, meetings or other tools that serve for the communication with suppliers. Tools for promotion and tools for the assessment of supplier compliance should be publicly available on the company's website. Furthermore, promotion of responsible tin sourcing should go beyond the scope of conflict minerals issues;
- publishing a list of smelters and/or refiners. The company should publish a list of all smelters and/or refiners that are present in its supply chain, including names and locations. Such a list could be the same as the one required by the Dodd-Frank Act.

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GES' engagements efforts follow the work and findings of the TWG as this is currently the best practise to address and manage the issue. GES will continue its engagements to encourage Nintendo, Shenmao and ZTE to recognise their responsibilities and to strengthen their policies and processes to ensure responsible tin sourcing. Furthermore, GES will continuously assess the performance of companies connected with Indonesian tin mining to ensure that the companies reported on earlier are still active in efforts to improve the situation. Investors are welcomed and encouraged to actively join this engagement.

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### RIO TINTO

*Corrupt practices, upgrade to engage*

**RIO TINTO** (Rio) is one of the world's largest diversified mining companies operating in 35 countries. In early November 2016, Rio reported to the UK, US, and Australian authorities, a 2011 payment of USD 10.5 million. The payment, made to a French banking consultant and personal friend of the Guinean President, was in relation to a USD 700 million "settlement" with the **GUINEAN GOVERNMENT** to secure the rights to the Simandou concession, the biggest untapped iron ore deposit in the world. Rio had exited the project two weeks earlier in October 2016.

Emails, exchanged between the then CEO, his successor who was the then Head of Rio's Iron Division and the Head of the Guinean project, discuss the consultant's fee for services in relation to Simandou agreeing the sum of USD 10.5 million.

Following Rio's reporting, further allegations were made: that Rio had known about the emails for over a year prior to reporting. Then the Guinean Mining Minister has stated that Rio's Head of Guinea operations approached him, in early 2010, with "the backing of senior management", to ask how much was required to win back control of the Simandou concession.

Rio has initiated an investigation into this specific payment but with an "eyes wide open" approach to other suspicious activity. The investigation will run parallel to those conducted by the **UK SERIOUS FRAUD OFFICE**, the **US DEPARTMENT OF JUSTICE** and **SECURITIES AND EXCHANGE COMMISSION** and authorities in Australia.

GES upgraded the case, due to the seniority of the personnel implicated, and in doing so GES is promoting UN Sustainable Development Goal target 16.5 to "substantially reduce corruption and bribery in all their forms". GES will assess Rio's anti-corruption policies and their enforcement, request a wider remit to their investigation and, request the enforcement of clawback provisions within the individual's remuneration packages. Rio's 2016 annual report has stated that they have deferred payment of bonuses to one former CEO whilst the investigation is being conducted.

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### PETROBRAS

*Better practices, but continuous high-risk context*

In October 2014, a former **PETROBRAS** executive admitted in a Brazilian federal court the existence of a kickback scheme at the company between 2004 and 2012. Since then, former Petrobras executives have been convicted for their involvement in the scheme and four are under criminal charges. Allegedly, as part of that scheme, Petrobras' suppliers paid kickbacks to a number of company executives and channelled a portion of the money from contracts to Brazilian politicians. The **BRAZILIAN FEDERAL POLICE** launched an investigation targeting the company's employees and subcontractors, as well as Brazilian politicians. Over 100 persons have so far been indicted on charges of corruption, money laundering and cartel formation.

Since the scandal was revealed to the general public in 2014, the company has taken several measures to strengthen its efforts on ethics and compliance. Among other things, Petrobras' Board of Directors approved the creation of a new division; the Directorate of Governance, Risk and Compliance. It is now operating at full scale with substantial resources at hand. Employees suspected to be involved in the scheme have been suspended. All employees, except those on sick leave or similar, have gone through ethics and compliance training. More such training is planned for this year.

A whistle-blower function is up and running by an independent third party, and judging from employee surveys, it is gaining more traction internally at the company. Internal control mechanisms have been strengthened, for example, by having contracts pass through more reviews and a mandatory requirement that at least two people sign a contract. Anti-corruption and strengthened internal control mechanisms are spelled out as the top priorities in the company's strategic plan for 2017-2021.

GES, recognises the progress made by the company and concluded in March 2017 that the first out of four revision criteria has been fulfilled. The revision criteria states "Petrobras should ensure that the violation has been investigated

thoroughly and that the Lava Jato bribery scheme has ended. The company should cooperate fully with the investigating authorities." The fact that the duration of the scheme is commonly reported to have taken place between 2004 and 2012 and that there are no indications that it is still ongoing at Petrobras (in combination with the company actions) were the fundamental circumstances that lead to this conclusion. Furthermore, the company is fully cooperating with investigations in Brazil and the US. Petrobras has also hired two law firms to investigate the scheme on its behalf company.

Going forward, GES will focus its engagement with Petrobras on further improvements related to internal control mechanisms, ethics and compliance assessments of suppliers, training of employees in "high-risk" positions, as well as ethics and compliance risk management at operations outside of Brazil. GES intends to continue dialogues with anti-corruption experts with regard to corporate operations in high-risk contexts. Due to its size and position in Brazil, Petrobras is well positioned to leverage a positive development on corruption prevention in the country. The context makes it a necessity to have a continuous high level of attention to the matter from the company's side. A high level of integrity to stay out of similar situations going forward is also important. Building alliances within the private sector against corruption would also send clear signals that companies are tackling the seriousness of the situation and step-by-step will work to change the nature of business as usual.

This case can be linked to SDG 16 on peace, justice and strong institutions, as combatting corruption requires effective and accountable institutions.

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### METALLURGICAL CORPORATION OF CHINA

*Environmental impacts from waste practices, move to disengage*

The **METALLURGICAL CORPORATION OF CHINA** (MCC) owns 61 per cent of **MCC RAMU NICO LTD**, which owns 85 per cent of the Ramu NiCo mine and smelter operation in Papua New Guinea. The operation utilises a waste disposal practice known as Deep Sea Tailings Placement (DSTP). DSTP is the practice in which tailings are deposited at depth (below 1000 metres) in the marine environment. This leads specifically to a loss of bottom-dwelling fauna – much of which has never been studied – and the spread of toxic chemicals across a wide ocean footprint. If the correct conditions are not present, upwelling can cause sediment to rise and impact the marine environment at more shallow depths, such as the abundance and diversity of fish species. It is a practice which is arguably in contravention of the London Convention (1972) and its update, the London Protocol (1996). It is also widely considered a contravention of UN Global Compact Principles 7 and 9 on the environment and corresponding Guideline VI of the OECD Guidelines for Multinational Enterprises.

GES commenced dialogue with MCC in December 2010, following our identification of their intended use of DSTP at their proposed Ramu NiCo operation. A first meeting took place in March 2011 and three more calls followed over the next two years with little development or clarity surrounding the company's environmental impact studies or any intention to change waste management practices at the site. GES has used native Chinese speakers throughout the process to attend meetings, calls and attempt to arrange further meetings.

Construction of the Ramu NiCo project was largely completed by 2012 with operations and deep sea tailing placement commencing shortly after. No response to dialogue has been received since a meeting in September 2013. GES is aware that other stakeholders, such as investors, have also tried to establish contact with MCC without success.

In October and November 2016, GES attempted to resume dialogue through MCC's minority partner at Ramu NiCo, **HIGHLANDS PACIFIC**. Despite two calls and several email exchanges no progress could be made. The contacts provided for Ramu NiCo did not respond.

MCC has encountered numerous problems at the Ramu NiCo site since operations began. In January 2016, there were strikes over reported low health and safety standards, followed by a fatal accident in April 2016 with a subsequent two-month closure of operations. A slurry pipe burst in March 2016 causing slurry to cover a number of gardens used for crops, which consequently led to complaints from the affected community members over a lack of compensation. In May 2016, 51 local workers were allegedly unfairly dismissed; their dismissals were suspected to be due to their involvement in earlier strikes. Then, in July 2016, there were allegations that the DSTP pipe itself was leaking causing pollution at shallow depths, an accusation denied by MCC. The project has an estimated life of some 50 years, until 2062.

According to GES' processes, after two years of low performance – i.e. the company does not make progress or respond in a meaningful way – GES can consider disengaging with the company. We have therefore concluded that GES should disengage from the Metallurgical Corporation of China.

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For further information, please contact:

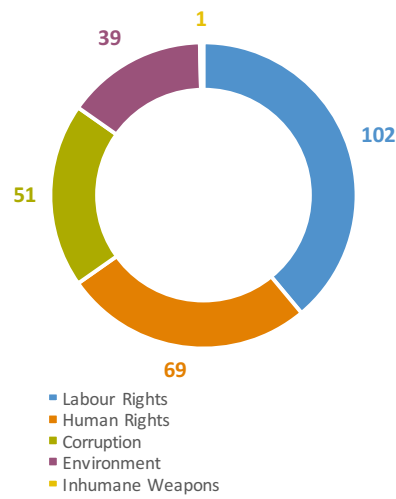


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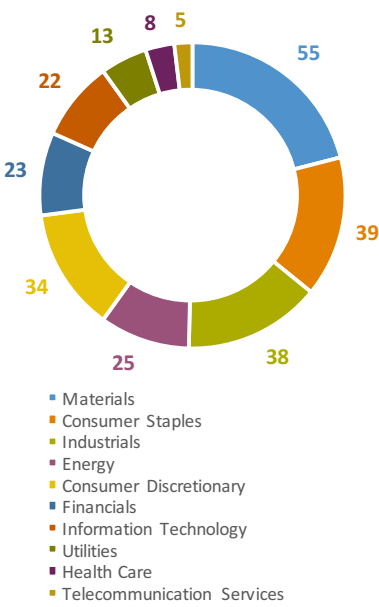
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# ENGAGEMENT SUMMARY REPORT

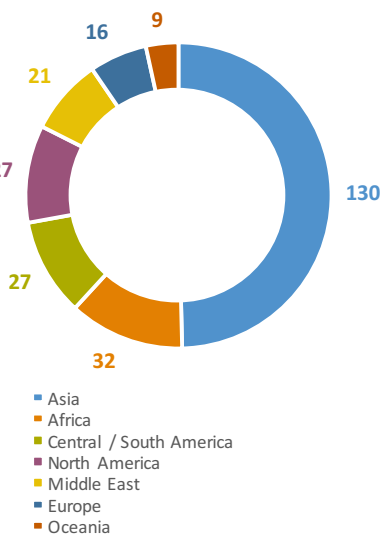
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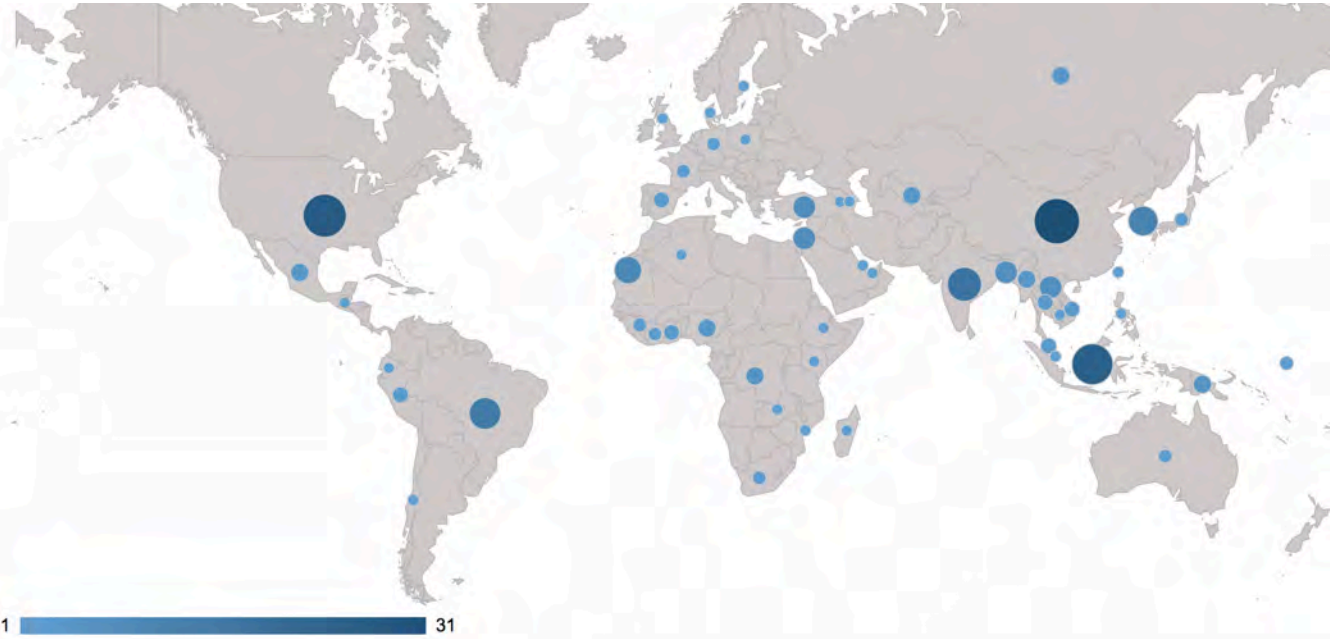
INDUSTRY SECTOR BREAKDOWN



GEOGRAPHIC BREAKDOWN



ENGAGEMENT MAP




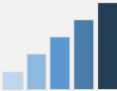
During Q1 2017 GES has been in active dialogue with companies as well as external sources associated to **262** business conduct issues.

In **93** “engage” cases we have continued our dialogue to track bespoke engagement goals and to seek measurable results of business conduct changes.

In **169** “evaluate” cases the objective of the dialogue is to bring the amount of credible information to a level that allows issuance of the next recommendation; either to archive the case or, to further engage with the company – if it is a case with severe consequences for the environment or humans.

# COMPANY DIALOGUE & PROGRESS SUMMARY

## HOW TO READ THIS REPORT

<b>Country</b>	<p>The country in the list indicates where the business conduct issue occurred. The breakdown into the regions Africa, Asia, Central/South America, Europe, Middle East, North America and Oceania is based on where the company headquarter is.</p>
<b>Year</b>	<p>The year shows when the case was upgraded to Engage status.</p>
<b>Response</b>	<p>The indicator describes how the company responds to GES' inquiries.</p> <ul style="list-style-type: none"> <li>● excellent</li> <li>● good</li> <li>● standard</li> <li>● poor</li> <li>● none</li> </ul>
<b>Progress</b>	<p>The indicator describes whether or not the violation continues, or how the company's work to prevent future violations is developing.</p> <ul style="list-style-type: none"> <li>↑ excellent</li> <li>↗ good</li> <li>→ standard</li> <li>↘ poor</li> <li>↓ none</li> </ul>
<b>Performance</b>	<p>The indicator describes the combined company progress and response performance.</p> <ul style="list-style-type: none"> <li>▲ High performance: good or excellent response and / or progress of the business conduct issue</li> <li>▶ Medium performance: standard level of response and progress</li> <li>▼ Low performance: poor or no response in combination with poor or no progress</li> </ul> <p><b>new</b>, same, better or worse – indicates the change in development since the last quarterly report.</p>
<b>Time</b>	<p>The indicator describes the time elapsed with low performance. One piece equals three months.</p> <div>  <p>After two years, the case will be reviewed by GES and a disengage recommendation can be issued if all other engagement options are ineffective.</p> </div>
<b>Milestone</b>	<p>The indicator describes the milestone achieved.</p> <div>  <ul style="list-style-type: none"> <li>Milestone 1: Initial communication sent to the engagement company</li> <li>Milestone 2: Dialogue established</li> <li>Milestone 3: Company commits to address issue</li> <li>Milestone 4: Company develops a strategy to address issue(s)</li> <li>Milestone 5: Issue(s) resolved / strategy effective</li> </ul> </div>

# AFRICA

## EVALUATE LIST

ANGLOGOLD ASHANTI, IMPALA PLATINUM

## ENGAGE LIST

**ADANI PORTS AND SPECIAL ECONOMIC ZONE LIMITED (2015)**  
*Environmental and human rights violations in port project*

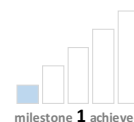
India



● poor → poor ▼ same

### Change objective

APSEZ should adhere to the court's orders and restore the damaged ecology in Mundra. The company should strictly follow the environmental clearance conditions granted for the Mundra port. APSEZ should improve local fishermen's livelihood and engage in stakeholder dialogue. All the company's efforts in Mundra should be clearly communicated to stakeholders.

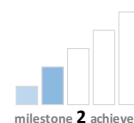


**BANGKOK BANK PUBLIC (2014)**  
*Financing of a dam project with environmental and human rights risks*

Laos

● standard → poor ► same

Bangkok Bank should ensure that impacts from the Xayaburi dam are in line with international standards, before continuing financing the project. If not, the bank should withdraw its credit. To prevent financing of future similar projects the bank should adopt corporate policies that address environmental and social risks in infrastructure projects, e.g. the Equator Principles.



**CHINA RAILWAY CONSTRUCTION CORP (2011)**  
*Forced evictions*

Ecuador

● standard → standard ► same

CRCC should be transparent and inform its stakeholders on how it views the allegations surrounding the Mirador mining project in Ecuador. Furthermore, the company should demonstrate that it has implemented the necessary policies and programmes to properly assess and mitigate social and environmental risks of all its projects, including of its subsidiaries.

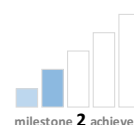


**CHINA RAILWAY GROUP (2014)**  
*Recurring fatal workplace accidents*

China

● standard → poor ► same

China Railway Group should re-evaluate its existing health and safety policies and practices, and prevent future accidents by aligning its management systems with international standards, such as ILO Convention 167 on safety and health in construction, and ILO Convention 174 on prevention of major industrial accidents.



**COAL INDIA LIMITED (2016)**  
*Deadly accidents at workplace*

India

● standard → standard ► same

Coal India should adequately strengthen its health and safety management systems to an extent that would result in a material and sustained decrease in accident rates. The company should also demonstrate that it has thoroughly examined and investigated the root causes of past accidents, and subsequently identified and corrected gaps in its systems.



**FAST RETAILING CO (2016)**  
*Labour rights violations in supply chain*

China

● standard → standard ► same

Fast Retailing should further develop and implement measures to prevent labour rights violations across its supply chain, and ensure that these commitments are fulfilled throughout both the organisation and its suppliers. The company should also be more transparent regarding its actions to mitigate labour rights-related risk, and addressing any shortcomings in this area

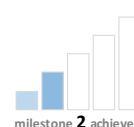


**HON HAI PRECISION INDUSTRY CO (2017)**  
*Environmental and human rights impacts caused by purchasing tin*

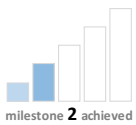
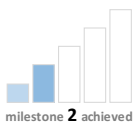
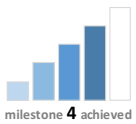
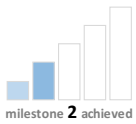
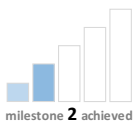
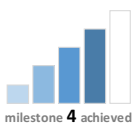
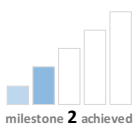
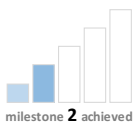
Indonesia

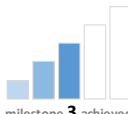
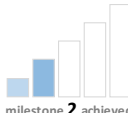
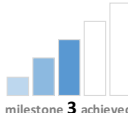
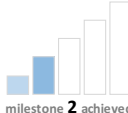
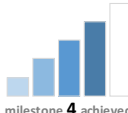
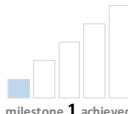
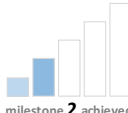

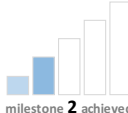
● standard → standard ► new

Hon Hai Precision Industry (trading as Foxconn Technology Group) should engage with its supplier of tin Shenmao Technology and improve the situation in Bangka and Belitung through joining the IDH Indonesian Tin Working Group.





<b>HON HAI PRECISION INDUSTRY CO (2017)</b> <i>Poor working conditions</i>	China	Hon Hai Precision Industry (trading as Foxconn Technology Group) should prevent labour rights violation in its supply chain and ensure that its commitments on labour rights are implemented and fulfilled throughout the organisation and suppliers. The company should be more transparent about the actions it takes towards incidents, enforcement and remedial measures as well as audits.	
● standard → standard ► new			
<b>HYUNDAI HEAVY INDUSTRIES CO LTD (2016)</b> <i>Recurring workplace accidents</i>	South Korea	Hyundai Heavy Industries should fully address and improve gaps in the company's health & safety management systems. It should also be more transparent with regards to publicly available information on its HSE performance.	
● standard → standard ► same			
<b>KASIKORNBANK (2014)</b> <i>Financing of a dam project with environmental and human rights risks</i>	Laos	Kasikornbank should ensure that impacts from the Xayaburi dam are in line with international standards, before continuing financing the project. If not, the bank should withdraw its credit. To prevent financing of future similar projects the bank should adopt corporate policies that address environmental and social risks in infrastructure projects, e.g. the Equator Principles.	
● good → standard ▲ same			
<b>KRUNG THAI BANK (2014)</b> <i>Financing of a dam project with environmental and human rights risks</i>	Laos	Krung Thai Bank should ensure that impacts from the Xayaburi dam are in line with international standards, before continuing financing the project. If not, the bank should withdraw its credit. To prevent financing of future similar projects the bank should adopt corporate policies that address environmental and social risks in infrastructure projects, e.g. the Equator Principles.	
● standard ↓ none ► same			
<b>NINTENDO CO (2017)</b> <i>Environmental and human rights impacts caused by purchasing tin</i>	Indonesia	Nintendo should show its commitment to responsible sourcing of tin through joining the multi-stakeholder initiative IDH Indonesia Tin Working Group and working towards improving the situation in Bangka and Belitung.	
● standard ↘ poor ► new			
<b>PEGATRON (2015)</b> <i>Poor working conditions</i>	China	Pegatron should prevent labour rights violations and ensure that it follows industry standards, such as the EICC's Code of Conduct. The company should be more transparent about actions it takes towards incidents, enforcement and remedial measures as well as audits. The company should also strengthen its reporting practices and disclose more viable information.	
● good ↗ good ▲ better			
<b>POSCO (2010)</b> <i>Environmental and human rights violations in steel project</i>	India	POSCO should conduct comprehensive environmental and human rights impact assessments in consultation with local communities and ensure that it takes all steps to become aware of, prevent and address the adverse environmental and human rights impacts linked to the Odisha project. It should also align its group-wide policies with the UN Guiding Principles on Business and Human Rights.	
● standard ↘ poor ► same			
<b>POSCO (2010)</b> <i>Human rights and environmental violations in a pipeline project</i>	Burma/ Myanmar	POSCO should ensure that Daewoo prevents negative human rights and environmental impacts of the Shwe project, and verify that the company and its subcontractors are not complicit in human rights abuses such as forced labour or illegal confiscation of land. POSCO should further encourage Daewoo to cooperate with the independent third-parties monitoring the project.	
● standard ↘ poor ► same			

<b>POSCO (2012)</b> <i>Child labour and forced labour in cotton supply chain</i>	Uzbekistan	<p>POSCO should cease its operations linked to Uzbek cotton or demonstrate how its subsidiary Daewoo is having a concrete positive impact on the harvesting practices in the country. POSCO should also align its group-wide policies with the UN Guiding Principles on Business and Human Rights and the ILO core conventions, especially conventions 138 and 182 on child labour and forced labour.</p>	
● standard → standard ► same			
<b>POSCO DAEWOO (2010)</b> <i>Human rights and environmental violations in a pipeline project</i>	Burma/ Myanmar	<p>Daewoo should prevent negative human rights and environmental impacts of the Shwe Project, and ensure that neither the company itself or its contractors and subcontractors are complicit in human rights abuses such as forced labour or illegal confiscation of land. In addition, Daewoo should cooperate with independent, verifiable, third-parties monitoring the project.</p>	
● standard → standard ► same			
<b>POSCO DAEWOO (2010)</b> <i>Child labour and forced labour in cotton supply chain</i>	Uzbekistan	<p>Daewoo should implement a supply chain management system aligned with the ILO core conventions, especially conventions 138 and 182, and use its leverage in Uzbekistan to push for better labour practices. If Daewoo is not able to guarantee that the cotton supplied to it is produced without forced labour, it should develop a timeline for withdrawing from Uzbekistan.</p>	
● standard → standard ► same			
<b>PTT PCL (2011)</b> <i>Biodiversity and food security impacts related to dam project on the Mekong River</i>	Laos	<p>PTT should demonstrate that the dam is operated as designed regarding environmental and social risk mitigation. This includes flow management which prioritises the integrity of impacted fish populations and sediment flow above power production.</p>	
● standard → standard ► same			
<b>SAMSUNG ELECTRONICS (2014)</b> <i>Poor working conditions in various countries</i>	China	<p>Samsung should ensure that its commitments on labour rights and the Supplier Code of Conduct are implemented and fulfilled throughout the organisation and its suppliers. The company should strengthen its monitoring and systematic auditing, including risk assessment, enforcement and remedial actions. The company should be more transparent with reporting.</p>	
● standard → standard ► worse			
<b>SAMSUNG ELECTRONICS (2017)</b> <i>Corrupt practices</i>	South Korea	<p>Samsung should adopt detailed policies for political, charitable contributions, facilitation payments, gifts and travel expenses. The company should further ensure that its anti-corruption policies are properly implemented and monitored. Samsung should increase independence of its board of directors and assure its audit and related party committees are fully independent.</p>	
● poor → standard ► new			
<b>SEVEN &amp; I HOLDINGS CO (2015)</b> <i>Labour rights violations at franchisees</i>	United States	<p>7&amp;i should ensure its franchisees are aware and follow the company's Corporate Action Guidelines and Code of Corporate Conduct. Moreover, the company should expand the scope of its Business Partner Action Guidelines to include franchisees. 7&amp;i should also develop better monitoring systems to detect, inter alia, potential labour law violations or payroll frauds within franchisees' operations.</p>	
● poor ↓ none ▼ same			
			
<b>SIAM COMMERCIAL BANK (2014)</b> <i>Financing of a dam project with environmental and human rights risks</i>	Laos	<p>Siam Commercial Bank should ensure that impacts from the Xayaburi dam are in line with international standards, before continuing financing the project. If not, the bank should withdraw its credit. To prevent financing of future similar projects the bank should adopt corporate policies that address environmental and social risks in infrastructure projects, e.g. the Equator Principles.</p>	
● standard ↘ poor ► same			

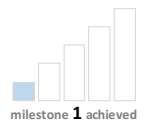
**SUN HUNG KAI PROPERTIES (2016)**  
Human rights violations in various countries

Nauru

Sun Hung Kai Properties should adhere to international human rights standards and comply with the UNHCR's recommendations to provide those detained within the centres with humane conditions. Ultimately, the company should end its involvement in the detention centres.



● poor ↘ poor ▼ same

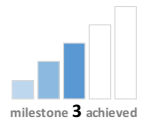


**TOKYO ELECTRIC POWER COMPANY (2011)**  
Unsafe nuclear power production

Japan

TEPCO should ensure it operates its nuclear power plants safely, safely decommissions Fukushima Dai-ichi and that the negative effects from the Fukushima Dai-ichi nuclear accidents are remediated and compensated. Ensure that the company considers all options for future power production in order for nuclear to get a balanced role.

● standard → standard ► same

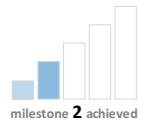


**YAHOO JAPAN CORP (2016)**  
Environmental impact caused by online trade of endangered species

Japan

Yahoo Japan should prevent controversial activities at its websites by ensuring rigorous monitoring systems and adhering not only to local laws, but also international environmental standards. The company should strengthen its environmental policies and be more transparent with reporting on the actions taken towards incidents.

● standard ↓ none ► worse

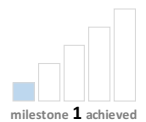


**ZIJIN MINING GROUP (2015)**  
Environmental impacts from waste practices

Papua New Guinea

Zijin should exert pressure on Barrick to ensure responsible management of tailings and to address potential long-term legacy issues at Porgera. Zijin should adopt a policy of prohibiting the future use of riverine tailings disposal.

● none → standard ► same

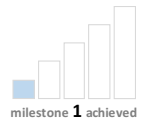


**ZIJIN MINING GROUP (2015)**  
Human rights violations in mining operation

Papua New Guinea

Zijin Mining Corp should demonstrate that an effective remedy framework is in place to compensate women who were sexually abused by security personnel at Porgera. The company should also demonstrate compliance with the Voluntary Principles on Security and Human Rights. Policies and procedures should be aligned with international standards on resettlement and compensation.

● none ↗ good ► same

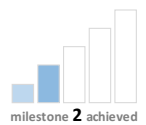


**ZTE CORP (2017)**  
Environmental and human rights impacts caused by purchasing tin

Indonesia

ZTE should show its commitment to responsible sourcing of tin through joining the multi-stakeholder initiative IDH Indonesia Tin Working Group and working towards improving the situation in Bangka and Belitung.

● poor ↘ poor ▼ new



## EVALUATE LIST

ADARO ENERGY PT, AGRICULTURAL BANK OF CHINA, ALUMINUM CORPORATION OF CHINA, ASUSTEK COMPUTER INC, BHARAT HEAVY ELECTRICALS LIMITED, BYD COMPANY, CHINA COMMUNICATIONS CONSTRUCTION CO, CHINA PETROLEUM & CHEMICAL CORP, CHINA RAILWAY GROUP, CHINA STEEL, COAL INDIA LIMITED, DMCI HOLDINGS, ELECTRIC POWER DEVELOPMENT, ELECTRICITY GENERATING, FELDA GLOBAL VENTURES, GUANGZHOU AUTOMOBILE GROUP, HANWHA CHEMICAL CORP, HINDALCO, HINDUSTAN PETROLEUM CORP, HONDA MOTOR CO, HTC CORP, HYUNDAI HEAVY INDUSTRIES CO LTD, HYUNDAI MOTOR COMPANY, INDOFOOD SUKSES MAKMUR, INDUSTRIAL AND COMMERCIAL BANK OF CHINA, ITOCHU CORP, KOREA ELECTRIC POWER CORPORATION, KT&G, KUALA LUMPUR KEPONG, LG CHEMICAL, LG CORP, LG ELECTRONICS, NTPC, OIL & NATURAL GAS CORPORATION, OLYMPUS CORP, PANASONIC CORPORATION, PETROCHINA, POSCO, POSCO DAEWOO, RELIANCE INDUSTRIES, SAMSUNG C&T, SAMSUNG ELECTRONICS, SAMSUNG SDI, SINA CORP, SINGAPORE TECHNOLOGIES ENGINEERING, SK HOLDINGS, TATA POWER, TATA STEEL, TDK CORP, TOSHIBA CORP, TOYOTA MOTOR CORPORATION, WILMAR INTERNATIONAL LIMITED, ZTE CORP

**DISENGAGE LIST**

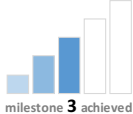
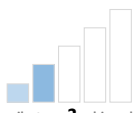
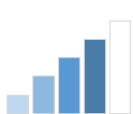

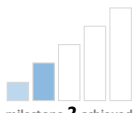
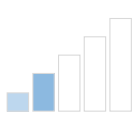
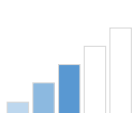
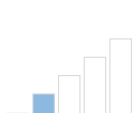
**HANWHA CORPORATION**

*Involvement in cluster munitions*


South Korea

# CENTRAL / SOUTH AMERICA

## ENGAGE LIST

		Change objective	
CEMEX (2016)	Palestine	Cemex should demonstrate that its operations on Occupied Palestinian Territory are in compliance with international humanitarian law. A structured dialogue with relevant stakeholders as well as an effective grievance mechanism are key elements needed to achieve that.	<div> <div>● standard → standard ► same</div>  </div>
ILETROBRAS (2016)	Brazil	Eletrobras should ensure that the bribery scheme has been investigated thoroughly and it should cooperate with the investigating authorities. Its anti-corruption programme should be strengthened in order to reflect its corruption risk exposure. Allocated resources, implementation, corrective actions and external verification in relation to the programme should be communicated.	<div> <div>● standard → standard ► same</div>  </div>
ILETROBRAS (2011)	Brazil	Eletrobras should recognise the rights of indigenous peoples as stipulated in relevant international norms. The company should also ensure that resettled people and other people affected by the dam are compensated and consulted in accordance with international norms. Appropriate environmental mitigation programmes should be carried out and verified by an independent third party.	<div> <div>● good ↗ good ▲ same</div>  </div>
GRUPO MEXICO (2016)	Peru	Grupo Mexico should align its practices to the Voluntary Principles on Security and Human Rights, or similar. The company should demonstrate that an adequate and continuous consultation process is being carried out in the communities nearby the project, as well as have a water management system in place for the Tia Maria project, aligned with international standards.	<div> <div>● poor ↘ poor ▼ worse</div>   </div>
JBS SA (2015)	United States	JBS should take responsibility for addressing the frequent health and safety (H&S) incidents at its subsidiaries. It should further develop H&S policies and practices aligned with ILO standards, and ensure their enforcement across the group. This should include proactively assessing risks and mitigating hazards, and be complemented with an appropriate disclosure.	<div> <div>● standard ↘ poor ► same</div>  </div>
PETROBRAS (2015)	Brazil	Petrobras should ensure that the bribery scheme has been investigated thoroughly and it should cooperate with the investigating authorities. Its anti-corruption programme should be strengthened in order to reflect its corruption risk exposure. Allocated resources, implementation, corrective actions and external verification in relation to the programme should be communicated.	<div> <div>● standard → standard ► same</div>  </div>
SOUTHERN COPPER CORPORATION (2016)	Peru	SCC should align its practices to the Voluntary Principles on Security and Human Rights, or similar. The company should demonstrate that an ongoing and adequate consultation process is in place in the communities nearby the project, as well as have a water management system in place for the Tia Maria project, aligned with international standards.	<div> <div>● standard ↘ poor ► worse</div>  </div>



<b>VALE SA (2016)</b> <i>Environmental and human rights violations caused by dam collapse</i>	Brazil	Vale should identify the cause(s) of the dam failure, assess all dams within its control to prevent similar failures in the future; develop a remedial strategy for the affected communities and the environment; ensure dam monitoring and maintenance systems and emergency procedures are in place.	 <small>milestone 4 achieved</small>
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● good
→ standard
▲ same

## EVALUATE LIST

BRASKEM SA, BRF SA, COMPANHIA SIDERURGICA NACIONAL, GERDAU PN, GRUPO MEXICO, MEXICHEM SAB DE CV, PETROBRAS, SUZANO PAPEL E CELULOSE

# EUROPE

## ENGAGE LIST

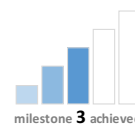
### Change objective

**ANDRITZ AG (2010)**

*Supplying to dam projects resulting in breaches of international standards*

Turkey

Andritz should adopt corporate policies that address environmental and social risks in infrastructure projects. The policies should advocate a precautionary approach and require that projects comply with internationally proclaimed environmental and social standards.



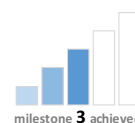
● standard → poor ► same

**BARRY CALLEBAUT AG (2010)**

*Child labour in the cocoa industry*

Ivory Coast

Barry Callebaut should show that its farmer programmes and other initiatives are effective in increasing income for cocoa farmers, improving access to school for children in cocoa communities and strengthening child labour remediation systems. The company should increase such efforts to reach more farmers and should be ready to discuss and disclose future plans for further scale-up.



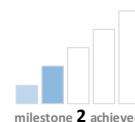
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**DEUTSCHE POST (2015)**

*Anti-union practices*

India

Deutsche Post should ensure its Code of Conduct is observed throughout its global operations, including subsidiaries. This refers to the CoC generally and freedom of association specifically. DP should ensure it has accurate processes to manage employee complaints, and report more transparently on the number of complaints and the measures taken to ensure compliance with the code.



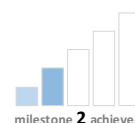
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**DEUTSCHE TELEKOM (2016)**

*Anti-union practices at subsidiary*

United States

Deutsche Telekom should ensure that the alleged practices of hindering freedom of association at T-Mobile US (TMUS) will cease and the subsidiary will engage in a dialogue with employees supporting unionisation. Deutsche Telekom should assure that TMUS' management of labour rights is aligned with the ILO core conventions.



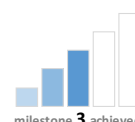
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**ENI (2015)**

*Corrupt practices*

Nigeria

ENI should demonstrate that its code of conduct, due diligence and risk management processes in the areas of acquisitions and divestments are robust and universally applied.



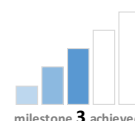
● standard → standard ► same

**FERROVIAL (2015)**

*Human rights violations in various countries*

Nauru

Ferrovial should adhere to international human rights standards and comply with the UNHCR's recommendations to provide those detained within the centres with humane conditions. Ultimately, the company should end its involvement in the detention centres.



● standard → standard ► same

**G4S (2011)**


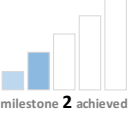

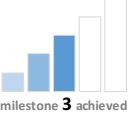


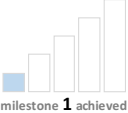
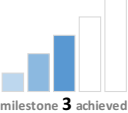
*Human rights violations in occupied territories*

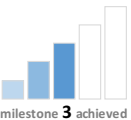
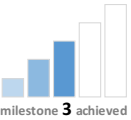
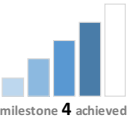
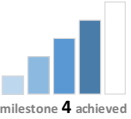
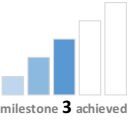
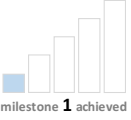
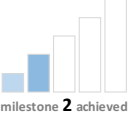

Palestine

G4S should properly investigate and address its activities allegedly in breach of International Humanitarian Law. The company should implement measures to prevent such allegations in the future and improve the risk assessment of its activities in high risk zones.



● excellent ↗ good ▲ same

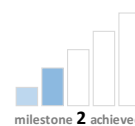
<b>GLAXOSMITHKLINE (2015)</b> <i>Corrupt practices</i>	China	GlaxoSmithKline should improve its anti-corruption programme in order to reflect its corruption risk exposure. The anti-corruption programme should be transparent in terms of allocated resources, implementation, follow-up mechanisms, corrective actions and external verification.	 milestone 4 achieved
● standard → standard ► same			
<b>GLENCORE PLC (2015)</b> <i>Operations in occupied territory</i>	Western Sahara	Glencore should demonstrate how its activities in Western Sahara are in line with the interests and wishes of Saharawis, in accordance with the right to self-determination stipulated in the International Covenant on Civil and Political Rights and International Covenant on Economic, Social and Cultural Rights. Should this not be possible, the company should withdraw from Western Sahara.	 milestone 2 achieved
● standard ↓ none ► same			
<b>GLENCORE PLC (2013)</b> <i>Environmental impact from pollution incidents</i>	Australia	Glencore should show that lead from the Mt Isa Mine is no longer a concern to the local community and should manage any issues in an appropriate manner. At McArthur River, there should be a costed and practical remediation plan for the mine addressing potential legacy issues e.g. acid rock discharge.	 milestone 4 achieved
● standard → standard ► same			
<b>HEIDELBERGCEMENT (2015)</b> <i>Violations of international law in occupied territories</i>	Palestine	HeidelbergCement should be able to demonstrate that its operations on Occupied Palestinian Territory are in compliance with international humanitarian law. A structured dialogue with relevant stakeholders as well as an effective grievance mechanism are key elements needed to achieve that.	 milestone 3 achieved
● excellent ↗ good ▲ same			
<b>HENNES &amp; MAURITZ (2010)</b> <i>Recurring violations in the cotton supply chain</i>	Uzbekistan	H&M should take all appropriate measures to trace its cotton back to the source in order to proactively address social risks at different stages within its supply chain. In particular, the company should ensure that it does not source any cotton originating from Uzbekistan, or otherwise produced using forced labour.	 milestone 4 achieved
● good ↗ good ▲ same			
<b>HSBC HOLDINGS (2016)</b> <i>Recurring incidents of money laundering in various countries</i>	United States	HSBC should implement systems and controls that prevent financial crime and money laundering and demonstrate that they are robust and universally applied.	 milestone 4 achieved
● good → standard ▲ same			
<b>KGHM (2017)</b> <i>Recurring fatal accidents</i>	Poland	The company should ensure it has internationally recognised health and safety policies, procedures and training for its workforce and suppliers.	 milestone 1 achieved
● poor ↓ none ▼ new			
<b>LEONARDO SPA (2013)</b> <i>Corrupt practices</i>	India	Leonardo should adopt an anti-corruption policy that includes a zero tolerance for bribery, and should improve its anti-corruption programme in order to reflect its corruption risk exposure. The programme should be transparent in terms of allocated resources, implementation, follow-up mechanisms, corrective actions and external verification.	 milestone 3 achieved
● good ↗ good ▲ same			

<b>LINDT &amp; SPRUENGLI AG (2011)</b> <i>Child labour in cocoa industry</i>	Ghana	Lindt and Spruengli should show that its farmer programmes and other initiatives are effective in increasing income for cocoa farmers, improving access to school for children in cocoa communities and strengthening child labour remediation systems. The company should increase such efforts to reach more farmers and should be ready to discuss and disclose future plans for further scale-up.	 milestone 3 achieved
● excellent   ↗ good   ▲ same			
<b>NESTLÉ SA (2009)</b> <i>Child labour in cocoa industry</i>	Ghana	Nestlé should show that its farmer programmes and other initiatives are effective in increasing income for cocoa farmers, improving access to school for children in cocoa communities and strengthening child labour remediation systems. The company should increase such efforts to reach more farmers and should be ready to discuss and disclose future plans for further scale-up.	 milestone 3 achieved
● excellent   ↗ good   ▲ same			
<b>NESTLÉ SA (2017)</b> <i>Labour rights violations</i>	Thailand	Nestlé should ensure an effective implementation of its Supplier Code of Conduct and a verifiable supply chain traceability system. Progress from the strengthened systems should be reported publicly, together with challenges and failures identified during the independent third party assessments.	 milestone 4 achieved
● good   → standard   ▲ new			
<b>NORDEA BANK (2015)</b> <i>Money laundering</i>	Sweden	Nordea should ensure that the issues raised by the Swedish Financial Supervisory Authority is addressed and managed in a responsible manner in order to manage the risks of contributing to illegal money laundering and facilitating financing of illegal activities such as terrorism.	 milestone 4 achieved
● standard   → standard   ► same			
<b>NORILSK NICKEL (2010)</b> <i>Environmental and health impacts from metal extraction operations</i>	Russian Federation	Norilsk Nickel should ensure for its Polar division that operations-related health impacts are properly managed, that emissions will not cause excessive harm to the environment and that historical impacts are properly remediated. Operations should align with the Russian environmental regulations, the CLRTAP, the Espoo Convention and the UN CBD.	 milestone 3 achieved
● standard   → standard   ► same			
<b>NOVARTIS AG (2017)</b> <i>Corrupt practices</i>	Turkey	Novartis should ensure that the revised and updated anti-bribery policy is followed worldwide and at subsidiary level, and reflects the company's corruption risk exposure. Allocated resources, implementation, corrective actions, monitoring and external verification in relation to the policy should be communicated.	 milestone 1 achieved
● standard   → standard   ► new			
<b>ROYAL DUTCH SHELL (2015)</b> <i>Corrupt practices</i>	Nigeria	Shell should demonstrate that its code of conduct, due diligence and risk management processes in the areas of acquisitions and divestments are robust and universally applied.	 milestone 2 achieved
● standard   → standard   ► same			
<b>ROYAL DUTCH SHELL (2009)</b> <i>Human rights violations resulting from pollution and environmental damage</i>	Nigeria	Shell should have a detailed program in place to address the recommendations of the UNEP's Environmental Impact Assessment of Ogoniland, and demonstrate that regular progress is being made towards achieving the objectives. The company should communicate the plan and progress transparently to shareholders. Shell should also exert its influence on all stakeholders to counter oil theft activity and its related social and environmental impacts.	 milestone 3 achieved
● good   → standard   ▲ same			

## SIEMENS (2017)

Operations in occupied territory

Siemens should demonstrate how its activities in Western Sahara are in line with the interests and wishes of Saharawis, in accordance with the right to self-determination stipulated in the International Covenant on Civil and Political Rights and International Covenant on Economic, Social and Cultural Rights. Should this not be possible, the company should withdraw from Western Sahara.



● standard    ↘ poor    ► new

## TELIA COMPANY AB (2012)

Corrupt practices

Uzbekistan

Telia Company should deploy an anti-corruption programme adapted to its corruption risk exposure. The anti-corruption programme should be transparent in terms of allocated resources, implementation, follow-up mechanisms, corrective actions and external verification.



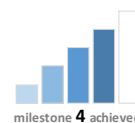
● excellent    ↗ good    ▲ same

## VINCI (2015)

Exploitation of migrant workers

Qatar

Vinci should adopt a human rights policy in line with the UN Global Compact and the basic ILO conventions on labour rights. The policy should cover the company's worldwide operations, including subsidiaries and subcontractors. In addition, the company should make sure it has the appropriate systems in place to make sure the policy is followed at all its operations.



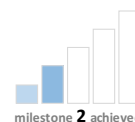
● good    ↗ good    ▲ same

## VOLKSWAGEN (2016)

Environmental impact caused by emissions defeat device

United States

VW should ensure the Supervisory Board has the necessary skills and independence and ensure oversight of the company's risk and its management systems. Furthermore, VW needs to appoint a management board executive accountable for environment and consumer protection.



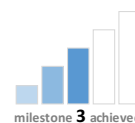
● standard    ↘ poor    ► same

## VTB BANK (2011)

Financing of project with environmental risks

Armenia

VTB Bank should strengthen its risk assessment process and monitoring process in large projects and should sign the Equator Principles. The company should also ensure that the operating company, Vallex Group, adopts a precautionary principle approach since the mining project is located in a sensitive biodiversity area.



● standard    → standard    ► better

## EVALUATE LIST

AIRBUS GROUP, ALSTOM, AP MOLLER MAERSK, ARCELORMITTAL, BAE SYSTEMS, BASF, BOLIDEN, BRAIT SE, BRITISH AMERICAN TOBACCO, DANSKE BANK A/S, DEUTSCHE BANK, ELECTRICITE DE FRANCE, ENEL, ENGIE, ENI, FIAT CHRYSLER AUTOMOBILES, GLENCORE PLC, HEIDELBERGCEMENT, HENNES & MAURITZ, INVESTOR AB, LUKOIL, NESTLE SA, RECKITT BENCKISER, RENAULT, REPSOL SA, ROSNEFT, ROYAL BANK OF SCOTLAND, SAINSBURY, SAIPEM, SHIRE PLC, STANDARD CHARTERED PLC, TENARIS SA, THALES, THYSSENKRUPP, UNILEVER, WARTSILA OYJ ABP, VOLKSWAGEN AG



# DISENGAGE LIST

<b>AIRBUS GROUP</b> <i>Nuclear weapons programmes</i>	France
<b>BAE SYSTEMS</b> <i>Nuclear weapons programmes</i>	United Kingdom
<b>LEONARDO SPA</b> <i>Nuclear weapons programmes</i>	France
<b>SAFRAN GROUP</b> <i>Nuclear weapons programmes</i>	France

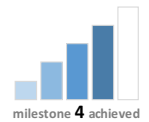
# MIDDLE EAST

## ENGAGE LIST

### Change objective

**AKBANK (2010)** Turkey  
Financing of a dam project resulting in breaches of environmental standards

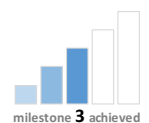
Akbank should adopt corporate policies that address environmental and social risks in infrastructure projects. The policies should advocate a precautionary approach and require that projects comply with internationally proclaimed environmental and social standards.



● standard → poor ▶ same

**BANK HAPAOALIM (2010)** Palestine  
Financing of illegal settlements in occupied territories

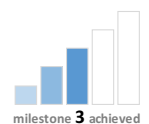
Bank Hapoalim should cease providing financial support to activities that are linked to violations of the Fourth Geneva Convention. The bank should adopt a corporate policy that supports the protection of internationally proclaimed human rights and the humanitarian law.



● good ↓ none ▶ same

**BANK LEUMI (2010)** Palestine  
Financing of illegal settlements in occupied territories

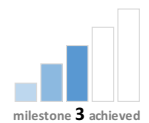
Bank Leumi should cease providing financial support to activities that are linked to violations of the Fourth Geneva Convention. The bank should adopt a corporate policy that supports the protection of internationally proclaimed human rights and the humanitarian law.



● good ↓ none ▶ same

**MIZRAHI TEFAHOT BANK LTD (2010)** Palestine  
Financing of illegal settlements in occupied territories

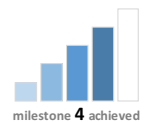
Mizrahi Tefahot Bank should cease providing financial support to activities that are linked to violations of the Fourth Geneva Convention. The bank should adopt a corporate policy that supports the protection of internationally proclaimed human rights and the humanitarian law.



● good ↓ none ▶ same

**TURKIYE GARANTI BANKASI (2010)** Turkey  
Financing of a dam project resulting in breaches of environmental standards

Turkiye Garanti Bankasi should adopt corporate policies that address environmental and social risks in infrastructure projects. The policies should advocate a precautionary approach and require that projects comply with internationally proclaimed environmental and social standards.



● good → standard ▲ same

## EVALUATE LIST

GLOBAL TELECOM HOLDING SAE

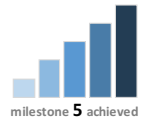
# DISENGAGE LIST

<b>ELBIT SYSTEMS</b> <i>Security systems for illegal separation barrier in occupied territories</i>	Palestine
<b>TURKIYE HALK BANKASI</b> <i>Financing of a dam project resulting in breaches of environmental standards</i>	Turkey

# NORTH AMERICA

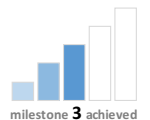
## RESOLVED LIST

<b>STARBUCKS CORP</b> <i>Anti-union practices</i>	Chile	<p><b>Change objective</b></p> <p>With the signing of the collective agreement between Starbucks and the Starbucks Worker's Union in Chile, the violation has ceased. The company's Global Human Rights policy is applied to all stores in all countries of operation, emphasising Starbucks commitment to human rights and explicitly mentioning freedom of association.</p>
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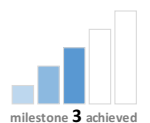
## ENGAGE LIST

<b>AGRIUM (2014)</b> <i>Operations in occupied territory</i>	Western Sahara	<p><b>Change objective</b></p> <p>Agrium should create and implement a plan on how to cease its imports of phosphates from Western Sahara, or demonstrate how the exploitation is in line with the interests and wishes of Saharawis, in accordance with the right to self-determination stipulated in the International Covenant on Civil and Political Rights and International Covenant on Economic, Social and Cultural Rights.</p>
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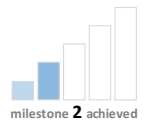
● standard    ↘ poor    ► same

<b>APPLE INC (2009)</b> <i>Labour rights violations at suppliers</i>	Taiwan	<p>Apple should prevent labour rights violation in its supply chain and ensure that its commitments on labour rights are implemented and fulfilled throughout the organisation and its suppliers. The company should be more transparent about the actions it takes towards incidents and engage in stakeholder dialogue.</p>
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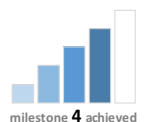
● poor    ↗ good    ► better

<b>BARRICK GOLD CORP (2009)</b> <i>Human rights violations in mining operation</i>	Papua New Guinea	<p>Barrick should demonstrate that an effective remedy framework is in place to compensate women who were sexually abused by security personnel at Porgera. The company should also demonstrate compliance with the Voluntary Principles on Security and Human Rights. Policies and procedures should be aligned with international standards on resettlement and compensation.</p>
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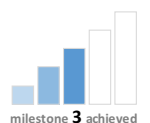
● good    ↗ good    ▲ better

<b>BARRICK GOLD CORP (2009)</b> <i>Environmental impacts from waste practices</i>	Papua New Guinea	<p>Barrick should manage its tailings at Porgera responsibly and commit to remediating the impacted environment. Barrick should address the remediation required of the two erodible dumps to prevent sediment wash into the river, and address long-term potential legacy issues e.g. acid mine discharges.</p>
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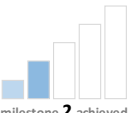
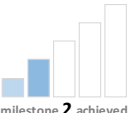
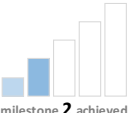

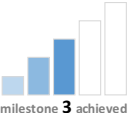

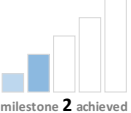
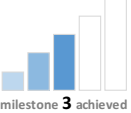



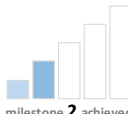

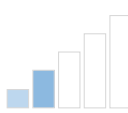

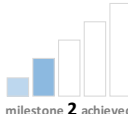

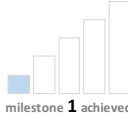
● standard    → standard    ► same

<b>CROWN HOLDINGS (2016)</b> <i>Anti-union practices in several countries</i>	Turkey	<p>Crown Holdings needs to make sure that its policies and processes are in compliance with ILO conventions referring to the right to organise and collective bargaining.</p>
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● poor    → standard    ► same

<b>ENBRIDGE (2016)</b> <i>Violations of indigenous peoples' rights</i>	United States	The company should enter in to a reconciliation dialogue with Standing Rock, with the objective to reach an agreement on how to improve trust and collaboration related to similar project in the future, as well as mitigation measures by the company to minimise risks and impacts on Standing Rock's territory and population, including its water resources.	 milestone 2 achieved
● standard    ↓ none    ► same			
<b>FREEPORT MCMORAN (2009)</b> <i>Environmental impacts from waste practices</i>	Indonesia	Freeport should manage its tailings at Grasberg responsibly and commit to remediating the impacted environment. Freeport should address the remediation required of the two erodible dumps to prevent sediment wash into the river, and address long-term potential legacy issues e.g. acid mine discharges.	 milestone 2 achieved
● good    → standard    ▲ better			
<b>FREEPORT MCMORAN (2009)</b> <i>Human rights violations by security forces</i>	Indonesia	Freeport should demonstrate that its regular payments to Indonesian police and military are being administered in a fully transparent manner and do not contribute to human rights abuses. The company should demonstrate implementation of the Voluntary Principles on Security and Human Rights.	 milestone 2 achieved
● standard    → standard    ► better			
<b>GOLDCORP (2008)</b> <i>Violations of indigenous peoples' rights</i>	Guatemala	Goldcorp should, as a part of integrating human rights due diligence at its operations, ensure adequate representation of indigenous communities in all consultation processes and implement grievance mechanisms. As requested in the revised precautionary measures by the Inter-American Commission on Human Rights, Goldcorp should provide local communities with potable water of good quality.	 milestone 4 achieved
● good    ↗ good    ▲ same			
<b>HERSHEY (2010)</b> <i>Child labour in cocoa industry</i>	Ivory Coast	Hershey should show that its farmer programmes and other initiatives are effective in increasing income for cocoa farmers, improving access to school for children in cocoa communities and strengthening child labour remediation systems. The company should increase such efforts to reach more farmers and should be ready to discuss and disclose future plans for further scale-up.	 milestone 3 achieved
● standard    → standard    ► same			
<b>MATTEL (2010)</b> <i>Poor working conditions at supplier factories</i>	China	Mattel should prevent labour rights violations in its supply chain through effective implementation and proactive enforcement of its Responsible Supply Chain Standards at all Mattel-owned factories as well as vendors. The company should also be more transparent about the auditing process and findings.	 milestone 4 achieved
● standard    → standard    ► same			
<b>MCDONALD'S CORP (2015)</b> <i>Labour rights violations at franchisees</i>	United States	McDonald's should actively promote the company's Standard of Business Conduct among its franchisees, and ensure franchisees live up to this especially with regards to labour rights. Efforts taken by the company to ensure compliance in this area should be transparently reported to relevant stakeholders.	 milestone 2 achieved
● standard    ↘ poor    ► same			
<b>MONDELEZ INTERNATIONAL (2009)</b> <i>Child labour in the cocoa industry</i>	Ghana	Mondelez should show that its farmer programmes and other initiatives are effective in increasing income for cocoa farmers, improving access to school for children in cocoa communities and strengthening child labour remediation systems. The company should increase such efforts to reach more farmers and should be ready to discuss and disclose future plans for further scale-up.	 milestone 3 achieved
● excellent    ↗ good    ▲ same			

<b>MOTOROLA SOLUTIONS (2010)</b> <i>Human rights violations in occupied territories</i>	Palestine	Motorola Solutions should cease the provisioning of surveillance systems for protecting illegal Israeli settlements in the OPT. The company should also widen the scope of its Human Rights policy to fully conform to international human rights and IHL and address specific risks associated to how its products are used.	 <div> <span>● poor</span> <span>↓ none</span> <span>▼ same</span> </div>	
<b>PHILLIPS 66 (2016)</b> <i>Violations of indigenous peoples' rights</i>	United States	The company should enter in to a reconciliation dialogue with Standing Rock, with the objective to reach an agreement on how to improve trust and collaboration related to similar project in the future, as well as mitigation measures by the company to minimise risks and impacts on Standing Rock's territory and population, including its water resources.	 <div> <span>● standard</span> <span>↓ none</span> <span>▶ same</span> </div>	
<b>POTASH CORP SASKATCHEWAN (2010)</b> <i>Operations in occupied territory</i>	Western Sahara	PotashCorp should create and implement a plan on how to cease its imports of phosphates from Western Sahara, or demonstrate how the exploitation is in line with the interests and wishes of Saharawis, in accordance with the right to self-determination stipulated in the International Covenant on Civil and Political Rights and International Covenant on Economic, Social and Cultural Rights.	 <div> <span>● poor</span> <span>↓ none</span> <span>▼ better</span> </div>	
<b>T-MOBILE US (2016)</b> <i>Anti-union practices</i>	United States	T-Mobile US (TMUS) should cease the alleged practices of hindering freedom of association at the company and engage in a dialogue with employees supporting unionisation. The company should adhere to the US National Labor Relations Board's decisions. TMUS' management of labour rights should be aligned with the ILO core conventions.	<div> <span>● standard</span> <span>→ standard</span> <span>▶ same</span> </div>	
<b>WELLS FARGO &amp; CO (2016)</b> <i>Workplace harassment and retaliation</i>	United States	Wells Fargo should ensure that it implements and monitors systems and procedures that protect employees from workplace harassment and from retaliation in cases where misconduct is reported. To support these systems and procedures, Wells Fargo should re-align its corporate culture so as to regain a sense of purpose and integrity, to redefine banking and restore trust with customers, employees and other stakeholders.	<div> <span>● standard</span> <span>↓ none</span> <span>▶ better</span> </div>	

## EVALUATE LIST

AMAZON.COM, ARCHER DANIELS MIDLAND, BOMBARDIER INC, BRISTOL-MYERS SQUIBB CO, BUNGE LIMITED, CISCO SYSTEMS, COGNIZANT TECHNOLOGY SOLUTIONS, COLGATE-PALMOLIVE, COSTCO WHOLESALE CORP, EXXON MOBIL, GENERAL ELECTRIC, GENERAL MOTORS, GOODYEAR TIRE & RUBBER, HASBRO, HEWLETT PACKARD ENTERPRISE, JM SMUCKER COMPANY, JOHNSON & JOHNSON, KELLOGG CO, LOCKHEED MARTIN, MCDONALD'S CORP, MERCK & CO, PEPSICO, PROCTER & GAMBLE CO, RESTAURANT BRANDS INTL INC, THE WILLIAMS COMPANIES, TWENTY-FIRST CENTURY FOX, TYSON FOODS, VF CORP, ZIMMER BIOMET HOLDINGS INC



## DISENGAGE LIST

**BOEING CO**  
*Nuclear weapons programmes*
United States

**CHEVRON**  
*Environmental damage in Amazon jungle*
Ecuador

**FLUOR CORP**  
*Nuclear weapons development*
United States

**GENERAL DYNAMICS CORP**  
*Nuclear weapons programmes*
United States

**HONEYWELL INTERNATIONAL**  
*Nuclear weapons programmes*
United States

**HUNTINGTON INGALLS INDUSTRIES**  
*Nuclear weapons development*
United States

**JACOBS ENGINEERING GROUP**  
*Nuclear weapons programmes*
United Kingdom

**LOCKHEED MARTIN**  
*Nuclear weapons programmes*
United Kingdom

**NORTHROP GRUMMAN CORP**  
*Nuclear weapons programmes*
United States

**RAYTHEON COMPANY**  
*Nuclear weapons programmes*
United States

**TEXTRON**  
*Involvement in cluster munitions*
United States

**WAL-MART STORES INC**  
*Dangerous sandblasting practice in supply chain*
China

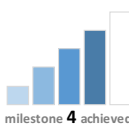
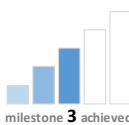
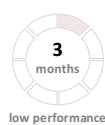
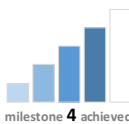
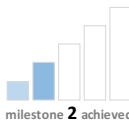

**WAL-MART STORES INC**  
*Inadequate workplace safety at suppliers*
Bangladesh

**WAL-MART STORES INC**  
*Inadequate pay in supply chain*
Haiti

**WAL-MART STORES INC**  
*Labour rights violations in various countries*
United States

# OCEANIA

## ENGAGE LIST

		Change objective	
<b>BHP BILLITON (2016)</b> <i>Environmental and human rights violations caused by dam collapse</i>	Brazil	BHP needs to identify the cause(s) of the dam failure; assess all dams within its control to prevent similar failures in the future; develop a remedial strategy for the affected communities and the environment; ensure dam monitoring and maintenance systems and emergency procedures are in place.	
<div>● good    ↗ good    ▲ better</div>			
<b>INCITEC PIVOT LTD (2009)</b> <i>Operations in occupied territory</i>	Western Sahara	IPL should create and implement a plan on how to cease its imports of phosphates from Western Sahara, or demonstrate how the exploitation is in line with the interests and wishes of Saharawis, in accordance with the right to self-determination stipulated in the International Covenant on Civil and Political Rights and International Covenant on Economic, Social and Cultural Rights.	
<div>● poor    ↓ none    ▼ better</div> <div>  <div>3 months low performance</div> </div>			
<b>RIO TINTO (2008)</b> <i>Environmental impacts from waste practises</i>	Indonesia	Rio Tinto should exert pressure on Freeport to ensure responsible management of tailings and to address potential long-term legacy issues at Grasberg. Rio Tinto should adopt a policy of prohibiting the future use of riverine tailings disposal.	
<div>● good    → standard    ▲ same</div>			
<b>RIO TINTO (2017)</b> <i>Corrupt practices</i>	Guinea	Rio Tinto should ensure it has anti-corruption policies and procedures in place that are sufficient to prevent similar payments in the future. Encourage the internal investigation to assess similar operational circumstances for the period 2008 to July 2015 (the period when the two implicated CEOs were in charge). Confirm that there is a “claw-back” mechanism within senior management’s remuneration packages should similar breaches of procedures be identified in the future.	
<div>● standard    → standard    ► new</div>			
<b>WESFARMERS (2007)</b> <i>Operations in occupied territory</i>	Western Sahara	Wesfarmers/CSBP should commit to entirely and permanently ending its imports of phosphate rock from Western Sahara, in accordance with the right to self-determination stipulated in the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.	
<div>● standard    ↗ good    ▲ same</div>			

## EVALUATE LIST

RIO TINTO, WOOLWORTHS LTD

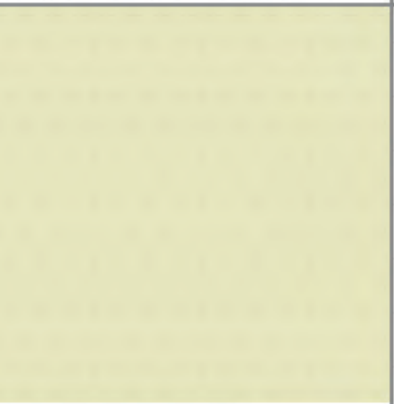


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**QUARTERLY ENGAGEMENT REPORT**  
**Q2 2017**





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ENGAGEMENT BRIEF	5
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COMPANY DIALOGUE & PROGRESS SUMMARY	17

This report summarises the shareholder engagement activities that GES has performed on behalf of Erste Asset Management during the second quarter of 2017.





# ABOUT ERSTE ASSET MANAGEMENT

Erste Asset Management is an international asset management company with a strong position in Central and Eastern Europe. Our activities are backed by the financial strength of Erste Group Bank AG.

We offer our clients a broad spectrum of high-quality investment funds and asset management solutions. We apply the highest quality to our clients' assets. This also goes for the comprehensive risk management of Erste Asset Management, which covers all our business areas.

Erste Asset Management attaches particular importance to providing responsible products and services. As a company we have dedicated ourselves to socially and environmentally agreeable behaviour.

We are proud of our employees and have become the employer of choice for specialists who wish to prove their talent in the various departments of Erste Asset Management.

## OUR APPROACH

In principle, the sustainability approach of Erste Asset Management is based on a three-dimensional structure. The dimensions of criteria definition, best-in-class and engagement / active ownership mutually enhance each other within an integrated process. A variety of approaches to sustainable investments are combined in this way in order to join somewhat restrictive elements with active, positive and dialog-based elements.

The dialog with the companies and the use of our own voting rights lie at the core of our active ownership policy. In both cases, the engagement serves to improve the future viability of the companies. Moreover, the engagement results are integrated into the company selection as well.

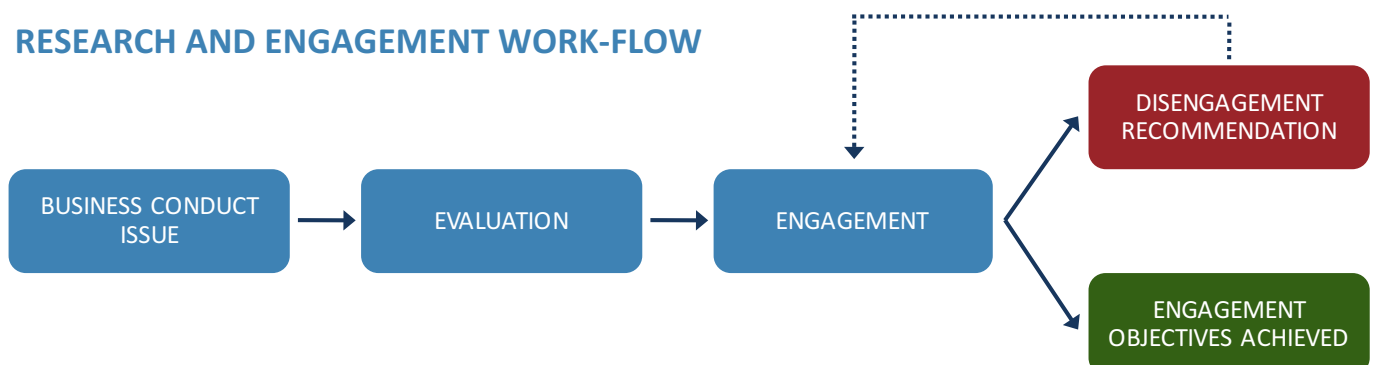
We believe that changes in business conduct drives changes in corporate value. Consequently, we seek to instigate changes in business conduct through engagement dialogue where deemed necessary.

We engage with companies in collaboration with our service provider GES. The engagement process is based on the findings from a systematic screening of companies regarding their compliance with well-established international conventions and guidelines on environmental, social and governance (ESG) issues. By way of example this includes:

- UN Global Compact
- OECD Guidelines for Multinational Enterprises
- Human rights conventions
- Environmental conventions

We will start engagement with companies that are, or have been involved in systematic business conduct issues or, an isolated issue that has severe consequences for the environment or humans.

### RESEARCH AND ENGAGEMENT WORK-FLOW



# ENGAGEMENT BRIEF

*Index of companies mentioned in this engagement brief*

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## GES BUSINESS CONDUCT ENGAGEMENT

### ACACIA MINING PLC

*Human rights violations by security forces - resolved*

**ACACIA MINING PLC (ACACIA)**, a subsidiary of **BARRICK GOLD CORPORATION**, was confronted by revelations of sexual assault against local women by security staff at its North Mara mine in Tanzania during 2011. An investigation by Acacia revealed that over a period of time, about 14 local women had been arrested at the mine site and then sexually assaulted by either company security guards or Tanzanian police.

Following the company investigation, which involved more than 200 interviews, Acacia instituted numerous changes including: changing the internal security provider, ensuring 24/7 management of security personnel, improving site fencing and surveillance and establishing a remedy mechanism. The remedy mechanism was criticised by NGOs, among other things, for not reaching all victims of sexual abuse.



*North Mara mining site, Acacia*

Acacia has since addressed many of the criticisms. North Mara also experienced regular mine intrusions by illegal miners, which resulted in several fatal clashes with mine security; the aforementioned changes in security arrangements, with the change from an open pit to a fully underground mine and the consequent downscaling of the operational area have resulted in a significant decrease in the number of intruders.

GES has been in dialogue with the company for a number of years via email exchanges and a number of face-to-face meetings. Although Acacia was originally occasionally defensive, the dialogue

has been generally constructive and Acacia has positively reacted to criticism with revisions to procedures. After NGOs complained about the lack of communication by the company of the grievance mechanism, Acacia now communicates the grievance mechanism through community liaison officers.

During a meeting in December 2016, the company agreed to increased transparency in its sustainability reporting, which was undertaken in April 2017.

Acacia also described the proactive approach that the company had undertaken at its prospective mine in Kenya, which includes community liaison over the exploratory works and agreements on working times with local communities (including night working where agreed), a compensation scheme for the exploratory works, remediation of exploratory areas, employment of a local Head of CSR, implementation of a grievance mechanism, employment of a team of local community liaison officers to raise awareness of the grievance mechanism and to educate local communities on the mine operations and to keep in check any unrealistic expectations.

Based on the improvements that the company has made, GES decided in June 2017 to resolve the case.

For further information, please contact:



**Bruce Jackson**

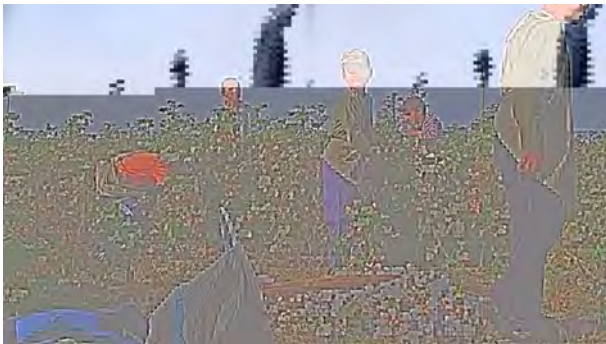
*Senior Engagement Manager*

## GES BUSINESS CONDUCT ENGAGEMENT

### HENNES & MAURITZ

*Addressing labour issues in its supply chain - resolved*

GES has been engaging with **HENNES & MAURITZ (H&M)** since 2009 over recurring allegations of labour rights violations in the company's supply chain. The case initially focused on Uzbek cotton, as H&M was accused of sourcing the material through a Bangladeshi supplier, but the engagement subsequently expanded to cover the risks and impacts of non-certified cotton in general as well as the working conditions throughout the value chain. Thanks to the commitment and leadership displayed by the company, GES decided to resolve the case in May 2017.



*Uzbek cotton field, Speaking Cotton film*

The garment sector has elevated social risks and as one of the largest players, H&M's operations are more in the spotlight of NGOs – and investors – than many of its peers. This reflects the fact that the company has more responsibility and power to address sector-wide problems than almost any other actor. Indeed, the risks have kept materialising over the years, and H&M is a constant target for reports highlighting labour rights and human rights violations in the garment supply chain. Apart from Uzbekistan, where forced labour and child labour in cotton cultivation are a long-standing problem, GES' analysis has included incidents in India, Ethiopia, Turkmenistan, Turkey, Cambodia and Burma.

H&M has generally addressed the reported breaches appropriately and progressively strengthened its supplier requirements and processes. It also provides one of the industry's most transparent supplier disclosure and frequently issues statements explaining its related actions. The incidents, nevertheless, illustrate a typical pattern for H&M:

violations within its supply chain in different countries surface intermittently, followed by the company responding promptly, accepting responsibility for rectifying the problem and stating its intention to use its leverage to push for broader improvements.

While GES expects this trend to continue, it recognises that the challenges are sector-wide and cannot be solved overnight, and overall H&M is a sector leader in corporate responsibility efforts. GES has had several written and in-person discussions with the company about various aspects of the issue to underline investor concerns and has obtained details about H&M's internal priorities and practices. The company is committed to leading the industry towards becoming more sustainable and responsible, and has backed this up with an ambitious strategy and concrete efforts. GES feels confident that H&M wants to utilise its size and leverage to effect improvements both individually, through its relationships with suppliers, and through cooperating with unions, NGOs, authorities and other stakeholders. Furthermore, it is clear that the company will do this regardless of investor engagement.

While H&M is not perfect and could do even more, GES is satisfied that the company is acting responsibly and strives to constantly mitigate risks and improve conditions within its sphere of influence. GES anticipates that H&M will continue to be associated with more incidents and will carefully assess any such allegations. However, given H&M's responsible approach to cotton sourcing and supply-chain working conditions, we now regard this case resolved. Should any new information emerge that calls this conclusion into question, GES will reconsider its stance.

Contribution to Sustainable Development Goal(s):



For further information, please contact:



**Tytti Kaasinen**  
*Senior Engagement Manager*

### LONMIN PLC

*Fatal police violence in South Africa - resolved*

**LONMIN PLC (LONMIN)** is the operator of the Marikana platinum mine located close to Johannesburg, South Africa. In August 2012, about 3,000 workers at the Marikana mine went on an unofficial strike over wages and a lack of adequate housing. Violent clashes between rival unions, mine security guards and police resulted in 44 fatalities and over 70 injured.

On 15 June 2017, GES resolved the case due to the actions the company has undertaken since the strike of August/September 2012; including:

- Appointment of an Executive Manager of Sustainability and an Executive Vice President of Public Affairs and Communication;
- The provision of compensation packages for the families of the deceased;
- Joining the **UN GLOBAL COMPACT'S** Business for Peace initiative, and initiated a gap analysis of company operations against the UN Guiding Principles for Business and Human Rights;
- Improved union relations including a change in the representative union from the **NATIONAL UNION OF MINE-WORKERS (NUM)** to the **ASSOCIATION OF MINeworkERS AND CONSTRUCTION UNION (ACMU)**;
- Improved community relations between: the company, communities, and police, including regular community forums to address community and security concerns;
- The internal security personnel undertaking training in the Voluntary Principles, and;
- The current Memoranda of Understanding with the **SOUTH AFRICAN POLICE SERVICE**, which reportedly encourages the use of non-lethal force.

Lonmin has ring-fenced around USD 500 million for housing development between 2014 and the end of 2018, which shows Lonmin's renewed level of commitment to address the issue. The on-going housing construction and the ring-fencing of resources is a positive change, in comparison to a history of broken company promises in this area.

Efforts include:

- Conversion of 128 hostel units into a mixture of family and single units, completed in November 2014. From 2014 until 2018, the company is providing USD 100 million each year for new accommodation for its permanent employees with an aim of providing housing to 11,500 (approximately half its permanent workforce) by end of 2018.
- Lonmin has stated its aim to house the remaining 11,500 by the end of 2023. This will effectively make Lonmin the platinum mining industry leader in housing for its workers and their families.

The evidence would indicate that relations with the unions have improved since 2012. First of all, even though there was a prolonged official strike at the beginning of 2014, it ended peacefully. Following the strike, the company and the union worked together to ensure that operations were safely ramped-up to full production. Secondly, there have been at least two negotiated wage settlements conducted between Lonmin and AMCU without violence or strikes. And thirdly, at the end of 2015 almost 6,000 workers were laid-off. This was undertaken in consultation with AMCU and was completed without strikes or violence. The laid-off workers were given training opportunities and negotiated settlements. Fourthly, Lonmin has a Housing Forum with the union to discuss the strategy for the provision of housing for the Lonmin workforce.

Other improvements at Lonmin include the company establishing a "human rights working group" in August 2015, comprising representatives from all areas of the business including risk, security, health and safety, environment, labour, community, supply chain, legal, company secretarial and communications. Lonmin's Board adopted its current human rights policy in November 2015. The website states that the "policy is explicitly informed by the United Nations Guiding Principles on Human Rights, as well as the United Nations Universal Declaration of Human Rights and other international instruments".



## GES BUSINESS CONDUCT ENGAGEMENT

Lonmin has also requested that it holds biannual updates with GES, in order to inform GES and its investors on how its implementation of the Social and Labour Plan is progressing and in order for any other issues to be discussed.

Based on the improvements that the company has made, GES decided in June 2017 to resolve the case.

For further information, please contact:



**Bruce Jackson**  
*Senior Engagement Manager*

### SEVEN & I HOLDINGS

*Labour rights violations at franchisees - resolved*

After three years of engaging with **SEVEN & I HOLDINGS**, GES now regards the case on labour rights violations at its franchisees as resolved. In 2013, US authorities seized 14 franchise stores of **7-ELEVEN INC.**, a subsidiary of Seven & I, because they had been employing illegal immigrants. Allegedly, the owners of these 14 franchisees had hired dozens of illegal immigrants and equipped them with identities stolen from US citizens and were taking substantial portions of their wages, generating over USD 182 million in proceeds from the 7-Eleven franchise stores. In 2015, allegations also emerged that **7-ELEVEN AUSTRALIA** was implicated in exploiting immigrant workers by using a systematic scheme in which workers had to put in longer hours than permitted but only received half of their pay.

After previously being slow, dialogue improved in late 2016, when Seven & I provided GES with its view on the labour rights issues at its franchisees and the measures it had implemented to address them.

In the US, several steps to train and encourage franchisees to comply with immigration and labour laws have been taken, such as advising them on wage laws and payroll information and pro-

viding online resources on minimum labour compliance. The company has also worked with the **US DEPARTMENT OF LABOR** and the **NATIONAL COALITION OF FRANCHISE OWNERS ASSOCIATION** to host training sessions and help educate franchisees regarding immigration forms and wage-and-hour requirements. In Australia, 7-Eleven implemented the **AUSTRALIAN FAIR WORK OMBUDSMAN'S** recommendations and launched a Wage Repayment Programme to identify and repay those franchisee staff that had not been paid their full entitlements.

While in dialogue with GES, the company also explained that it has a number of so-called Operation Fields Consultants (OFCs) in each market in which it operates. OFCs are responsible for providing a number of stores with store management consulting. These consultants are trained to constantly inform franchisees of their obligations under the franchise agreement to comply with all laws, including wage and hour laws. Also, the payroll system is designed to ensure that payments to franchisee employees comply with minimum wage requirements.

Due to the measures taken to address the situations at its franchisees in the US and Australia, GES assesses the company's response to the situation as satisfactory and regards the case as resolved.

For further information, please contact:



**Ellinor Hagebrink**  
*Engagement Manager*



## GES BUSINESS CONDUCT ENGAGEMENT

### TRANSOCEAN

*Fatal explosion and major oil spill - resolved*

**TRANSOCEAN** has made material progress in the aftermath of the Macondo spill and from 5 June 2017, GES considers all revision criteria fulfilled. The company's earlier reluctance to respond to more detailed enquiries improved in the first half of 2017. GES is satisfied with the company's responses regarding improvements in HSE management systems, reporting, and due diligence across Transocean's operations.



*Deepwater Horizon burning, Wikimedia*

GES was in dialogue with Transocean after the accident happened in April 2010. The company described its role as a drilling contractor to **BP** as that of a tool and manpower provider, and that the responsibility for risks associated with well design and the execution of the drilling were BP's. The company has said that government focus on the blowout preventer during investigations since the Macondo blowout was misplaced. Transocean said it mainly agreed with the causes identified in BP's incident investigation report, but disagreed with the assigning of blame to Transocean and contractors.

During 2014, Transocean communicated to GES that improvements to the company's HSE management systems were underway and would soon be published on the company's website. The motivation for this was that Transocean was being forced to improve its systems under two special agreements with the **US ENVIRONMENTAL PROTECTION AGENCY** and **US DEPARTMENT OF JUSTICE** following the loss of Deepwater Horizon, the semi-submersible offshore drilling rig owned by Transocean. The changes applied to the US operations, and the agreements were posted on Transocean's website. Transocean at the time said it was rolling out a new global HSE

management system but did not provide further details.

GES tried to engage with the company in 2015 and 2016 through teleconference and email, but the company did not reply until April 2017, when GES coordinated and sent an investor letter to Transocean, requesting more details on the improvements within its HSE standards and culture. Following that letter, a telephone conference between Transocean's heads of HSE management and investors was arranged by GES. All of GES' and the investors' outstanding questions were satisfactorily answered by Transocean during the call.

GES received credible assurances by the company that, although the Consent Decree applies to US waters only, Transocean's HSE management system is global in its entirety. The company has a HSE adviser on every vessel. That role is very important in coaching the company's senior and junior people on how to properly use HSE tools on the job. The advisers report directly to the managers on a weekly basis.

When Transocean enters a drilling contract with one of its customers as part of a tender process, the company ensures the customer understands Transocean's HSE system. To secure its implementation, a bridging document is created between the customer's HSE management system and Transocean's, with Transocean taking primacy on the vessels. The company will use the customer's safety system wherever there are gaps, and so looks to meet the highest expectations of both management systems.

The company also described its plans to issue a sustainability report in the future, aggregating relevant reporting that is already public but presented in a format that is more helpful for investors.

Based on the improvements that the company has made, GES has decided in June 2017 to resolve the case.

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For further information, please contact:



**Flemming Hedén**

*Senior Engagement Manager*

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### BRITISH AMERICAN TOBACCO

*Facing labour issues in its supply chain*

Over the last couple of years, the media and non-governmental organisations have drawn attention to labour rights violations within **BRITISH AMERICAN TOBACCO'S (BAT)** supply chain in Indonesia and Bangladesh. In June 2016, the Stockholm-based organisation **SWED-WATCH** issued a report based on research carried out in three of BAT's tobacco cultivation areas in Bangladesh. The report found instances of child labour and debt bondage, as well as adverse health impacts of pesticides on workers.



*Tobacco cultivation, Indonesia*

Tobacco harvesting and production is labour intensive. Harvesting is generally done manually, and work in tobacco production is hazardous for both adults and children. Workers use dangerous tools and may be exposed to intense heat and pesticides, including neurotoxins. Workers who harvest tobacco leaves without adequate protective equipment are also vulnerable to Green Tobacco Sickness, a condition caused by absorption of nicotine through the skin, which can cause nausea, weakness, headaches, and respiratory symptoms. Children are most vulnerable to these risks, as their bodies are still developing. As the Swedwatch report revealed, children often help their parents for extended hours during the harvest season and therefore cannot fully attend school.

GES has been in dialogue with BAT following the reports indicating improper labour practices in BAT's supply chain in Bangladesh. BAT stated it had verified the allegations with its local subsidiaries in Bangladesh, and explained that its

internal investigation had not provided any evidence to support the allegations presented in the Swedwatch report. In addition, BAT highlighted the fact that the annual self-assessment and on-site reviews conducted every four years by an independent body, **AB SUSTAIN**, had not revealed any noncompliance either. Furthermore, the company explained that it addressed social and environmental issues associated with growing and processing tobacco through the **SUSTAINABLE TOBACCO PROGRAMME**, an industry-wide initiative developed in collaboration with other manufacturers. The programme sets expectations of working conditions and labour standards for farmers, their families and hired workers, with a specific focus on child labour. It also provides a framework for improvement through annual self-assessments and on-site reviews. These on-site reviews include analysis of supplier policies, processes and practices.

BAT has expressed its commitment in addressing labour issues in its supply chain. However, the company still needs to ensure proper implementation of the Sustainable Tobacco Programme and enforce the ban on child labour in practice. The company should provide regular training on the main pillars of the Programme, including child labour prevention, safe working environments, fair treatment, and forced labour prevention. BAT should conduct regular monitoring in the supply chain for child labour and other human rights risks, and include the use of unannounced inspections. GES will continue to engage with the company. By doing so, GES is addressing SDG 8 on decent work and economic growth.

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Contribution to Sustainable Development Goal(s):



For further information, please contact:



**Ewelina Łukasik-Morawska**  
*Engagement Manager*

### THAI UNION GROUP

*Addressing labour issues in its supply chain*

For the last few years, Thailand has been identified as one of the countries with the highest incidence of human trafficking. The employment of low-cost migrant labour has provided a challenge for the country's authorities and the lack of proper enforcement of safety and labour standards has left many migrant workers vulnerable to human trafficking. **THAI UNION GROUP (TUG)** produces seafood and operates mainly in Thailand, but it is also present in other South East Asian countries, and is comparably exposed to human and labour rights risks. Given the severity of the human rights allegations, GES decided to engage with the company. Over the last three years, TUG has demonstrated a commitment to eradicating modern slavery and remaining actively engaged with industry, civil society and governments.



*Thai fishing vessels, Wikimedia Commons*

In 2015, TUG released a revised Business Ethics and Labour Code of Conduct, which was designed to guide employees, suppliers and business partners. TUG conducts internal and third-party audits to inspect manufacturing facilities and interview employees to ensure that suppliers and their sub-suppliers are in full compliance with TUG standards. TUG identifies the potential risks in its supply chain through supply-chain mapping and risk analysis. The company conducts an activity-based risk analysis for all its suppliers so that it can establish which suppliers are potentially high-risk for certain activities. Moreover, TUG is working with the **THAI GOVERNMENT** to drive port-state measures to eliminate Illegal, Unregulated and Unreported (IUU) seafood from its supply chain. In

Thailand, the company has implemented a vessel-to-processor traceability system that cross-references Marine Catch Purchase Documentation with the **THAI DEPARTMENT OF FISHERIES**. In addition to addressing IUU, this process works to ensure that labour is legal.

Migration and recruitment of migrant workers has been recognised as one of the highest risk areas in which workers often become involved in forced labour or debt bondage. Therefore, TUG has focused on reducing the potential for abuse and extortion by agents and brokers. The company has mapped recruitment processes, in cooperation with the **MIGRANT WORKER RIGHTS NETWORK** and the **ISSARA INSTITUTE** providing oversight of the process and assisting with effective communication with workers on safe and legal migration. In 2016, TUG issued an Ethical Migrant Worker Recruitment Policy and eliminated recruitment fees for all workers in its factories and processing plants, effective for all future recruitment of workers both from Thailand and overseas.

TUG has demonstrated its commitment in addressing labour issues in its supply chain. However, the company still has to ensure effective implementation of its Code of Conduct and Recruitment Policy. Also, progress should be reported publicly, together with information about any challenges and failures identified during independent third-party assessments. GES will continue to engage with the company and monitor for further developments in closing such gaps. In doing so, GES is promoting UN Sustainable Development Goal 8 that aims to protect labour rights and ensure safe and secure working environments for all workers.

Contribution to Sustainable Development Goal(s):



For further information, please contact:



**Ewelina Łukasik-Morawska**  
*Engagement Manager*



### WAL-MART STORES

*Labour rights violations in various countries*

In May 2017, GES decided to restore the Engage recommendation for **WAL-MART STORES (WAL-MART)**. The labour rights case against the company started in 2003 and GES had been recommending disengaging from Wal-Mart since April 2014. This was due to the company's persistent low performance and poor responsiveness over several years, the severity and systematic nature of the incidents, and the fact that it was continuously being linked to new breaches of labour rights in different parts of its business and in various geographies. In GES' view, not only did Wal-Mart have significant outstanding issues it had not rectified, but also the company's approach to labour standards left it exposed to further material incidents in the future. Furthermore, Wal-Mart had appeared largely uninterested in responding to investor concerns and, consequently, there was very little to no opportunity to positively influence its corporate behaviour through engagement.



*Walmart store exterior, Flickr*

However, in 2015, there began to be indications that meaningful changes in Wal-Mart's labour risk management were under way, with the company starting to take concrete measures to tackle legacy issues as well as to proactively mitigate further incidents. GES succeeded in re-establishing contact with Wal-Mart and conference calls were held in November 2015 and January 2016, but this responsiveness did not last. During 2016, however, the company continued to announce further improvements relating to working conditions both in its stores and supply chain. Unfortunately, its non-responsiveness also continued, and in early 2017, GES coordinated an investor letter to seek a

renewed dialogue with the company. Signed by twelve GES' clients, the letter to Wal-Mart's VP of Investor Relations acknowledged the encouraging developments but also underlined the importance of two-way communications with investors.

A constructive call discussing Wal-Mart's approach to managing social issues was subsequently held in mid-April 2017. In a conversation with GES ahead of the call, Wal-Mart pointed out that it is unable to respond to all enquiries but recognised the value and effectiveness of reaching several investors through the GES-coordinated dialogue. Wal-Mart further followed up the call by sending additional material and reiterating its interest in a continued dialogue.

Given the positive developments in Wal-Mart's performance and responsiveness, GES deems there to be potential for investors to have an impact through active ownership. Accordingly, GES concludes it to be appropriate to revise its recommendation to Engage. The next step is to seek more reassurance from the company, encourage further improvements, and assess if its actions might satisfy some of the revision criteria. GES' change objective for this case is for Wal-Mart to cease and mitigate non-compliance in areas related to labour rights and to strengthen its corresponding policies and guidelines.

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Contribution to Sustainable Development Goal(s):



For further information, please contact:



**Tytti Kaasinen**

*Senior Engagement Manager*

### MOTOROLA SOLUTIONS

*Human rights violations in the occupied  
Palestinian territories*

After years of multifaceted engagement, **MOTOROLA SOLUTIONS (MOTOROLA)** clearly communicated to GES that it sees no need to change how it manages human rights or how it operates. This follows a pattern of how the company has reacted to related shareholder resolutions and other types of engagement in the past.

Motorola's US head office earlier confirmed to GES that it "has sold radar surveillance systems in Israel" but due to "security reasons", the company "cannot comment on the exact locations where the systems are deployed". The company also stated that the systems "are designed and used for defensive protection in limited areas by providing early warning of an offensive intrusion". It further stated that all of Motorola's global activities were "conducted in strict accordance with U.S., local, country and all other applicable laws, as well as the company's own code of business conduct which is designed to ensure that operations worldwide are conducted using the highest standards of integrity and ethical business conduct applied uniformly and consistently". Motorola has declined to comment on the issue further.

GES tried unsuccessfully to set up a meeting with the company in Chicago in spring 2015. GES' CEO, and subsequently a number of investors, sent letters to Motorola's CEO and Chairman of the board in attempts to make the dialogue meaningful. At no point has the company changed or offered to discuss human rights impacts on the occupied Palestinian territories (OPT) from its operations. When GES pointed to a need to manage more general human rights issues, such as the need to cover the use of products, the company responded that it saw no need to revise how it manages human rights. GES does not see any positive outcomes from investor engagement with the company. Although there have been meetings with the company, they have not moved any discussed issues forward.

When faced with the risk of investor disengagement as a result of this the company stated:  
*"...there are no effective gaps between Motorola*

*Solutions' Human Rights Policy ("Policy") and internationally recognized human rights standards. Our Policy aligns, in every material respect, with the tenets of the ILO's fundamental conventions and the UN Declaration of Human Rights. Motorola Solutions' practices and policies comply with the laws of the countries in which we operate, and we are an active member of the EICC, whose mission is consistent with internationally recognized human rights principles."*

In 2015, to avoid any misunderstandings regarding the nature of Motorola Solutions' ongoing involvement in operations in the OPT, GES secured pictures of Motorola-labelled radar-fence equipment. The photos were dated and geotagged to places that could be independently verified as illegal settlements.



*Motorola-labelled equipment on an entrance road to the Hayovel outpost, GES*

GES presented this information to Motorola and encouraged the company to correct any misunderstanding from GES' side. The company has chosen not to comment on this. When GES visited illegal settlements in the OPT, equipment resembling the Motoeagle surveillance system was seen. GES asked the settlement representative about this, but the representative declined to comment.

In June 2017, GES decided to disengage from the company. GES is prepared to reengage with the company if it becomes open to revising its position on the matter.

For further information, please contact:



**Flemming Hedén**

*Senior Engagement Manager*

### HEWLETT PACKARD ENTERPRISE

*GES assessment and updated conclusion*

GES has researched and evaluated **HEWLETT PACKARD ENTERPRISE** known as **HPE**, (formerly Hewlett-Packard Co) and its involvement in the **BASEL SYSTEM**, an automated biometric access control system for checkpoints in the occupied Palestinian territories (OPT). Reportedly, the system was provided through **EDS ISRAEL**, a subsidiary of Hewlett-Packard, to the **ISRAELI MINISTRY OF DEFENCE**. The Palestinians living in the West Bank and Gaza are affected daily by the checkpoint system and the separation wall. In 2004, the **INTERNATIONAL COURT OF JUSTICE** found the construction of a wall in the OPT and in East Jerusalem to be illegal under international law and called on Israel to cease it.



*GES visit at the Bethlehem checkpoint in April 2013, GES*

In the research and dialogue with GES, HPE stated that the system was designed to help the people passing through the settlement wall. When GES visited Israel and Palestine in 2013, this was one of the issues GES researched. The findings at that stage was that the system in use did not make any difference for the people passing through, it neither helped or hindered them. The context itself is controversial and GES has continuously encouraged HPE to hold a stakeholder dialogue to

ensure that their understanding of how the system makes the passing easier is supported, however a stakeholder dialogue has never taken place. Meanwhile, GES has not had sufficient information to confirm that HPE was violating international norms even though the company was present in a complex and controversial context. The Basel contract expired in December 2016 and was not renewed, and there is no service contract to support the system once the contract ended.

Since January 2017, HPE does not have any existing contracts regarding the Basel system. Furthermore, in April 2017, HPE spun-off its **ENTERPRISE SERVICES** group (the entity supporting the Basel system) which then merged with **CSC** to form **DXC TECHNOLOGY**. At the time of the spin/merge, the Basel system did not belong to, and was not supported by, any of the companies. However, if there were any questions regarding the Basel system from its users, HPE assumes that they would be directed towards DXC Technology. HPE clarified that since the contract expired, there is no expectation from HPE/DXC to provide any further technical support. This information was communicated to GES in a meeting held with HPE in June 2017. Due to this new information, GES has decided to archive the case.

GES is aware than many other stakeholders have, in various ways, confirmed that HPE is compliant in violating international norms due to its, now, former involvement in the checkpoints. However, in GES' view of assessing companies operating in this context, the information and involvement has not been assessed as strong enough to confirm a violation.

Contribution to Sustainable Development Goal(s):



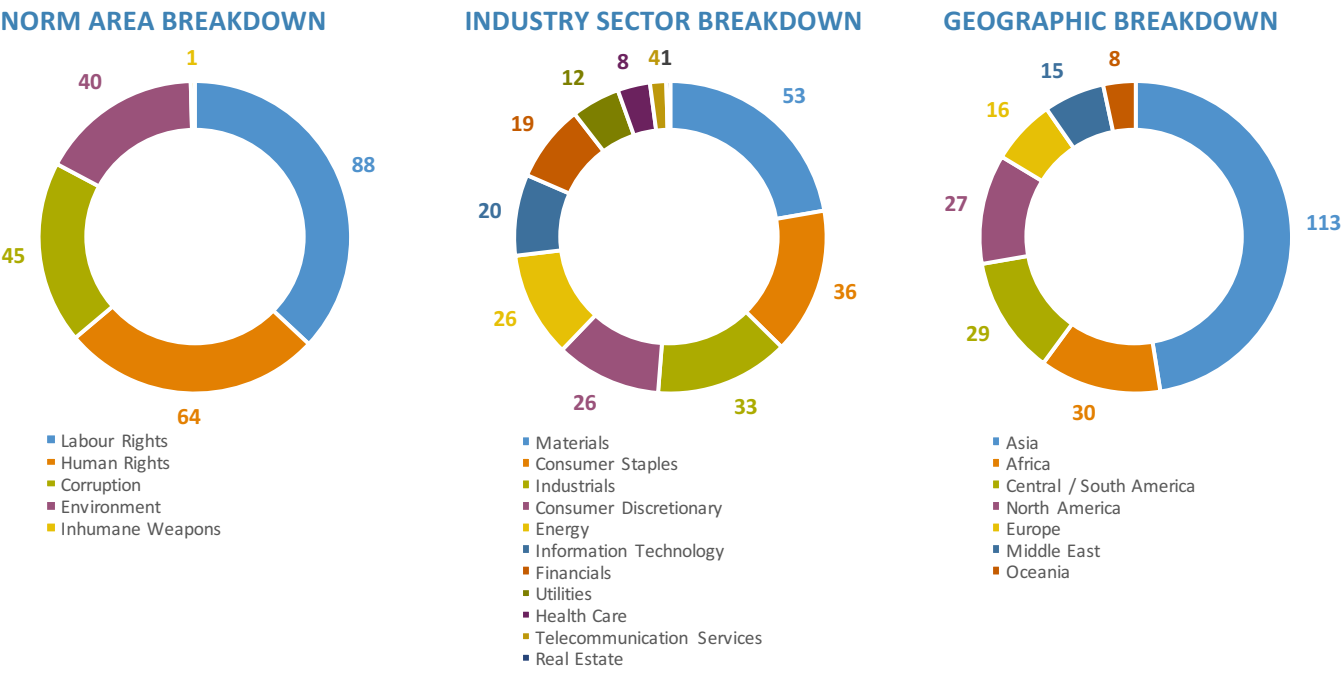
For further information, please contact:



**Aurora Samuelsson**  
*Senior Engagement Manager*



# ENGAGEMENT SUMMARY REPORT



## ENGAGEMENT MAP



During Q2 2017 GES has been in active dialogue with companies as well as external sources associated to **238** business conduct issues.

- In **94** “engage” cases we have continued our dialogue to track bespoke engagement goals and to seek measurable results of business conduct changes.
- In **144** “evaluate” cases the objective of the dialogue is to bring the amount of credible information to a level that allows issuance of the next recommendation; either to archive the case or, to further engage with the company – if it is a case with severe consequences for the environment or humans.

# COMPANY DIALOGUE & PROGRESS SUMMARY

## HOW TO READ THIS REPORT

Country	<p>The country in the list indicates where the business conduct issue occurred.</p> <p>The breakdown into the regions Africa, Asia, Central/South America, Europe, Middle East, North America and Oceania is based on where the company headquarter is.</p>
Year	<p>The year shows when the case was upgraded to Engage status.</p>
Response	<p>The indicator describes how the company responds to GES' inquiries.</p> <div><div></div> excellent</div> <div><div></div> good</div> <div><div></div> standard</div> <div><div></div> poor</div> <div><div></div> none</div>
Progress	<p>The indicator describes whether or not the violation continues, or how the company's work to prevent future violations is developing.</p> <div><div></div> excellent</div> <div><div></div> good</div> <div><div></div> standard</div> <div><div></div> poor</div> <div><div></div> none</div>
Performance	<p>The indicator describes the combined company progress and response performance.</p> <div><div></div> High performance: good or excellent response and / or progress of the business conduct issue</div> <div><div></div> Medium performance: standard level of response and progress</div> <div><div></div> Low performance: poor or no response in combination with poor or no progress</div> <p><b>new</b>, same, better or worse – indicates the change in development since the last quarterly report.</p>
Time	<p>The indicator describes the time elapsed with low performance. One piece equals three months.</p> <div><div></div><p>After two years, the case will be reviewed by GES and a disengage recommendation can be issued if all other engagement options are ineffective.</p></div>
Milestone	<p>The indicator describes the milestone achieved.</p> <div><div></div><p>Milestone 1: Initial communication sent to the engagement company Milestone 2: Dialogue established Milestone 3: Company commits to address issue Milestone 4: Company develops a strategy to address issue(s) Milestone 5: Issue(s) resolved / strategy effective</p></div>

# AFRICA

## ENGAGE LIST

ANGLOGOLD ASHANTI, IMPALA PLATINUM

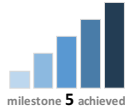
## RESOLVED LIST

**SEVEN & I HOLDINGS**  
*Labour rights violations*

India

### Change objective

GES has decided to resolve this case as Seven & I has shown how it works to ensure franchisees are aware of and follow its Code of Corporate Conduct, along with monitoring systems to detect potential labour law violations within franchisees' operations.



## ENGAGE LIST

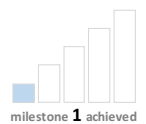
**ADANI PORTS AND SPECIAL ECONOMIC ZONE LIMITED (2015)**  
*Environmental and human rights violations in port project*

India

### Change objective

APSEZ should adhere to the court's orders and restore the damaged ecology in Mundra. The company should strictly follow the environmental clearance conditions granted for the Mundra port. APSEZ should improve local fishermen's livelihood and engage in stakeholder dialogue. All the company's efforts in Mundra should be clearly communicated to stakeholders.

● poor ↘ poor ▼ same

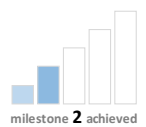


**BANGKOK BANK PUBLIC (2014)**  
*Financing of a dam project with environmental and human rights risks*

Laos

Bangkok Bank should ensure that impacts from the Xayaburi dam are in line with international standards, before continuing financing the project. If not, the bank should withdraw its credit. To prevent financing of future similar projects the bank should adopt corporate policies that address environmental and social risks in infrastructure projects, e.g. the Equator Principles.

● standard ↘ poor ► same

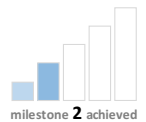


**CHINA RAILWAY CONSTRUCTION CORP (2011)**  
*Forced evictions*

Ecuador

CRCC should be transparent and inform its stakeholders on how it views the allegations surrounding the Mirador mining project in Ecuador. Furthermore, the company should demonstrate that it has implemented the necessary policies and programmes to properly assess and mitigate social and environmental risks of all its projects, including of its subsidiaries.

● standard → standard ► same

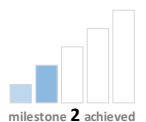


**CHINA RAILWAY GROUP (2014)**  
*Recurring fatal workplace accidents*

China

China Railway Group should re-evaluate its existing health and safety policies and practices, and prevent future accidents by aligning its management systems with international standards, such as ILO Convention 167 on safety and health in construction, and ILO Convention 174 on prevention of major industrial accidents.

● standard ↘ poor ► same

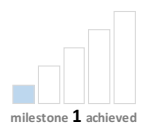


**COAL INDIA LIMITED (2016)**  
*Deadly accidents at workplace*

India

Coal India should adequately strengthen its health and safety management systems to an extent that would result in a material and sustained decrease in accident rates. The company should also demonstrate that it has thoroughly examined and investigated the root causes of past accidents, and subsequently identified and corrected gaps in its systems.

● standard → standard ► same



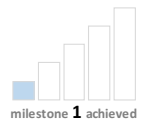
**COAL INDIA LIMITED (2017)**  
*Human rights violations*

India

Coal India should align its practices with the relevant IFC Performance Standards, in particular those related to consultation, resettlement and compensation to project affected local communities.



● poor ↘ poor ▼ new

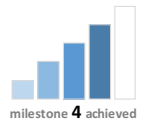


**FAST RETAILING CO (2016)**  
*Labour rights violations in supply chain*

China

Fast Retailing should further develop and implement measures to prevent labour rights violations across its supply chain, and ensure that these commitments are fulfilled throughout both the organisation and its suppliers. The company should also be more transparent regarding its actions to mitigate labour rights-related risk, and addressing any shortcomings in this area.

● standard → standard ► same

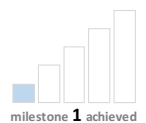


**FELDA GLOBAL VENTURES (2017)**  
*Human rights violations*

Malaysia

Felda should establish a social and human rights due diligence programme to identify, prevent and mitigate any social and/or human rights impacts caused/contributed by its own activities or its business partners. The company should also develop supplier guidelines for responsible business conduct at all levels, including business partners and contractors.

● good ↗ good ▲ new

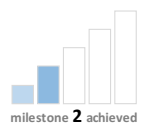


**HON HAI PRECISION INDUSTRY CO (2017)**  
*Environmental and human rights impacts caused by purchasing tin*

Indonesia

Hon Hai Precision Industry (trading as Foxconn Technology Group) should engage with its supplier of tin Shenmao Technology and improve the situation in Bangka and Belitung through joining the IDH Indonesian Tin Working Group.

● standard → standard ► same

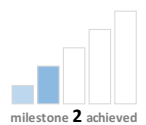


**HON HAI PRECISION INDUSTRY CO (2017)**  
*Poor working conditions*

China

Hon Hai Precision Industry (trading as Foxconn Technology Group) should prevent labour rights violation in its supply chain and ensure that its commitments on labour rights are implemented and fulfilled throughout the organisation and suppliers. The company should be more transparent about the actions it takes towards incidents, enforcement and remedial measures as well as audits.

● standard → standard ► same

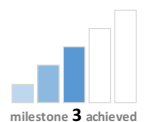


**HYUNDAI HEAVY INDUSTRIES CO LTD (2016)**  
*Recurring workplace accidents*

South Korea

Hyundai Heavy Industries should fully address and improve gaps in the company's health & safety management systems. It should also be more transparent with regards to publicly available information on its HSE performance

● good → standard ▲ better

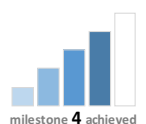


**KASIKORNBANK (2014)**  
*Financing of a dam project with environmental and human rights risks*

Laos

Kasikornbank should ensure that impacts from the Xayaburi dam are in line with international standards, before continuing financing the project. If not, the bank should withdraw its credit. To prevent financing of future similar projects the bank should adopt corporate policies that address environmental and social risks in infrastructure projects, e.g. the Equator Principles.

● good → standard ▲ same

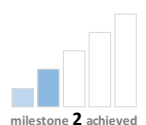


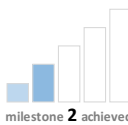
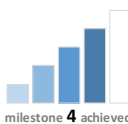
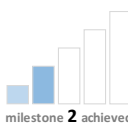
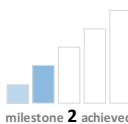
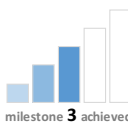
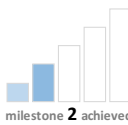

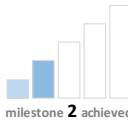
**KRUNG THAI BANK (2014)**  
*Financing of a dam project with environmental and human rights risks*

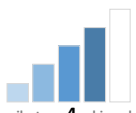
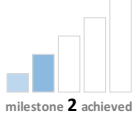

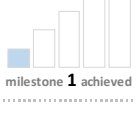





Laos

Krung Thai Bank should ensure that impacts from the Xayaburi dam are in line with international standards, before continuing financing the project. If not, the bank should withdraw its credit. To prevent financing of future similar projects the bank should adopt corporate policies that address environmental and social risks in infrastructure projects, e.g. the Equator Principles.

● standard ↓ none ► same



<b>NINTENDO CO (2017)</b> <i>Environmental and human rights impacts caused by purchasing tin</i>	Indonesia	Nintendo should show its commitment to responsible sourcing of tin through joining the multi-stakeholder initiative IDH Indonesia Tin Working Group and working towards improving the situation in Bangka and Belitung.	<div> <div>● standard</div> <div>↘ poor</div> <div>▶ same</div> </div> 
<b>PEGATRON (2015)</b> <i>Poor working conditions</i>	China	Pegatron should prevent labour rights violations and ensure that it follows industry standards, such as the EICC's Code of Conduct. The company should be more transparent about actions it takes towards incidents, enforcement and remedial measures as well as audits. The company should also strengthen its reporting practices and disclose more viable information.	<div> <div>● good</div> <div>↗ good</div> <div>▲ same</div> </div> 
<b>POSCO (2010)</b> <i>Environmental and human rights violations in steel project</i>	India	POSCO should conduct comprehensive environmental and human rights impact assessments in consultation with local communities and ensure that it takes all steps to become aware of, prevent and address the adverse environmental and human rights impacts linked to the Odisha project. It should also align its group-wide policies with the UN Guiding Principles on Business and Human Rights.	<div> <div>● standard</div> <div>↘ poor</div> <div>▶ same</div> </div> 
<b>POSCO (2010)</b> <i>Human rights and environmental violations in a pipeline project</i>	Burma/ Myanmar	POSCO should ensure that Daewoo prevents negative human rights and environmental impacts of the Shwe project, and verify that the company and its subcontractors are not complicit in human rights abuses such as forced labour or illegal confiscation of land. POSCO should further encourage Daewoo to cooperate with the independent third-parties monitoring the project.	<div> <div>● standard</div> <div>↘ poor</div> <div>▶ same</div> </div> 
<b>POSCO (2012)</b> <i>Child labour and forced labour in cotton supply chain</i>	Uzbekistan	POSCO should cease its operations linked to Uzbek cotton or demonstrate how its subsidiary Daewoo is having a concrete positive impact on the harvesting practices in the country. POSCO should also align its group-wide policies with the UN Guiding Principles on Business and Human Rights and the ILO core conventions, especially conventions 138 and 182 on child labour and forced labour.	<div> <div>● standard</div> <div>→ standard</div> <div>▶ same</div> </div> 
<b>POSCO DAEWOO (2010)</b> <i>Human rights and environmental violations in a pipeline project</i>	Burma/ Myanmar	Daewoo should prevent negative human rights and environmental impacts of the Shwe Project, and ensure that neither the company itself or its contractors and subcontractors are complicit in human rights abuses such as forced labour or illegal confiscation of land. In addition, Daewoo should cooperate with independent, verifiable, third-parties monitoring the project.	<div> <div>● standard</div> <div>→ standard</div> <div>▶ same</div> </div> 
<b>POSCO DAEWOO (2010)</b> <i>Child labour and forced labour in cotton supply chain</i>	Uzbekistan	Daewoo should implement a supply chain management system aligned with the ILO core conventions, especially conventions 138 and 182, and use its leverage in Uzbekistan to push for better labour practices. If Daewoo is not able to guarantee that the cotton supplied to it is produced without forced labour, it should develop a timeline for withdrawing from Uzbekistan.	<div> <div>● standard</div> <div>→ standard</div> <div>▶ same</div> </div> 
<b>PTT PCL (2011)</b> <i>Biodiversity and food security impacts related to dam project on the Mekong River</i>	Laos	PTT should demonstrate that the dam is operated as designed regarding environmental and social risk mitigation. This includes flow management which prioritises the integrity of impacted fish populations and sediment flow above power production.	<div> <div>● standard</div> <div>→ standard</div> <div>▶ same</div> </div> 

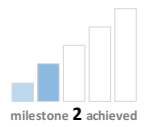
<b>SAMSUNG ELECTRONICS (2014)</b> <i>Poor working conditions in various countries</i>	China	<p>Samsung should ensure that its commitments on labour rights and the Supplier Code of Conduct are implemented and fulfilled throughout the organisation and its suppliers. The company should strengthen its monitoring and systematic auditing, including risk assessment, enforcement and remedial actions. The company should be more transparent with reporting.</p>	 <p>milestone 4 achieved</p>
<p>● standard → standard ► same</p>			
<b>SAMSUNG ELECTRONICS (2017)</b> <i>Corrupt practices</i>	South Korea	<p>Samsung should adopt detailed policies for political, charitable contributions, facilitation payments, gifts and travel expenses. The company should further ensure that its anti-corruption policies are properly implemented and monitored. Samsung should increase independence of its board of directors and assure its audit and related party committees are fully independent.</p>	 <p>milestone 2 achieved</p>
<p>● standard → standard ► better</p>			
<b>SIAM COMMERCIAL BANK (2014)</b> <i>Financing of a dam project with environmental and human rights risks</i>	Laos	<p>Siam Commercial Bank should ensure that impacts from the Xayaburi dam are in line with international standards, before continuing financing the project. If not, the bank should withdraw its credit. To prevent financing of future similar projects the bank should adopt corporate policies that address environmental and social risks in infrastructure projects, e.g. the Equator Principles.</p>	 <p>milestone 2 achieved</p>
<p>● standard ↘ poor ► same</p>			
<b>SUN HUNG KAI PROPERTIES (2016)</b> <i>Human rights violations in various countries</i>	Nauru	<p>Sun Hung Kai Properties should adhere to international human rights standards and comply with the UNHCR's recommendations to provide those detained within the centres with humane conditions. Ultimately, the company should end its involvement in the detention centres.</p>	 <p>milestone 1 achieved</p>
<p>● poor ↘ poor ▼ same</p>			
	 <p>9 months low performance</p>		
<b>THAI UNION GROUP (2017)</b> <i>Environmental impact caused by online trade of endangered species</i>	Thailand	<p>TUG should ensure an effective implementation of its Ethical Migrant Worker Recruitment policy, Code of Conduct and a verifiable supply chain traceability system. Progress from the strengthened systems should be reported publicly, together with challenges and failures identified during the independent third-party assessments.</p>	 <p>milestone 3 achieved</p>
<p>● good ↗ good ▲ new</p>			
<b>TOKYO ELECTRIC POWER COMPANY (2011)</b> <i>Unsafe nuclear power production</i>	Japan	<p>TEPCO should ensure it operates its nuclear power plants safely, safely decommissions Fukushima Dai-ichi and that the negative effects from the Fukushima Dai-ichi nuclear accidents are remediated and compensated. Ensure that the company considers all options for future power production in order for nuclear to get a balanced role.</p>	 <p>milestone 3 achieved</p>
<p>● standard → standard ► same</p>			
<b>YAHOO JAPAN CORP (2016)</b> <i>Environmental impact caused by online trade of endangered species</i>	Japan	<p>Yahoo Japan should prevent controversial activities at its websites by ensuring rigorous monitoring systems and adhering not only to local laws, but also international environmental standards. The company should strengthen its environmental policies and be more transparent with reporting on the actions taken towards incidents.</p>	 <p>milestone 2 achieved</p>
<p>● standard ↓ none ► same</p>			
<b>ZIJIN MINING GROUP (2015)</b> <i>Environmental impacts from waste practices</i>	Papua New Guinea	<p>Zijin should exert pressure on Barrick to ensure responsible management of tailings and to address potential long-term legacy issues at Porgera. Zijin should adopt a policy of prohibiting the future use of riverine tailings disposal.</p>	 <p>milestone 2 achieved</p>
<p>● poor → standard ► better</p>			



**ZIJIN MINING GROUP (2015)**  
Human rights violations in mining operation

Papua New Guinea

Zijin Mining Corp should demonstrate that an effective remedy framework is in place to compensate women who were sexually abused by security personnel at Porgera. The company should also demonstrate compliance with the Voluntary Principles on Security and Human Rights. Policies and procedures should be aligned with international standards on resettlement and compensation.

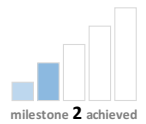


● poor    ↗ good    ► better

**ZTE CORP (2017)**  
Environmental and human rights impacts caused by purchasing tin

Indonesia

ZTE should show its commitment to responsible sourcing of tin through joining the multi-stakeholder initiative IDH Indonesia Tin Working Group and working towards improving the situation in Bangka and Belitung.



● poor    ↘ poor    ▼ same

## EVALUATE LIST

AGRICULTURAL BANK OF CHINA, ALUMINUM CORPORATION OF CHINA, ASUSTEK COMPUTER INC, BHARAT HEAVY ELECTRICALS LIMITED, BYD COMPANY, CHINA COMMUNICATIONS CONSTRUCTION CO, CHINA PETROLEUM & CHEMICAL CORP, CHINA RAILWAY GROUP, ELECTRICITY GENERATING, GUANGZHOU AUTOMOBILE GROUP, HANWHA CHEMICAL CORP, HINDALCO, HONDA MOTOR CO, HTC CORP, HYUNDAI MOTOR COMPANY, INDOFOOD SUKSES MAKMUR, INDUSTRIAL AND COMMERCIAL BANK OF CHINA, KOREA ELECTRIC POWER CORPORATION, KT&G, LG CHEMICAL, LG CORP, LG ELECTRONICS, NTPC, OIL & NATURAL GAS CORPORATION, OJI HOLDINGS CORPORATION, OLYMPUS CORP, PANASONIC CORPORATION, PETROCHINA, POSCO, POSCO DAEWOO, RELIANCE INDUSTRIES, SAMSUNG ELECTRONICS, SAMSUNG HEAVY INDUSTRIES, SAMSUNG SDI, SINA CORP, SINGAPORE TECHNOLOGIES ENGINEERING, SK HOLDINGS, SUMITOMO CORP, TATA POWER, TATA STEEL, TDK CORP, TOSHIBA CORP, TOYOTA MOTOR CORPORATION, WILMAR INTERNATIONAL LIMITED, ZTE CORP

**DISENGAGE LIST**

**HANWHA CORPORATION**

*Involvement in cluster munitions*

South Korea

# CENTRAL / SOUTH AMERICA

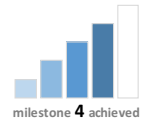
## ENGAGE LIST

**CEMEX (2016)**  
*Illegal settlements in occupied territories*

Palestine

### Change objective

Cemex should demonstrate that its operations on Occupied Palestinian Territory are in compliance with international humanitarian law. A structured dialogue with relevant stakeholders as well as an effective grievance mechanism are key elements needed to achieve that.

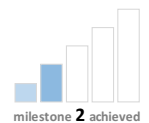


● good ↗ good ▲ better

**ELETROBRAS (2016)**  
*Corruption practices*

Brazil

Eletrobras should ensure that the bribery scheme has been investigated thoroughly and it should cooperate with the investigating authorities. Its anti-corruption programme should be strengthened in order to reflect its corruption risk exposure. Allocated resources, implementation, corrective actions and external verification in relation to the programme should be communicated.

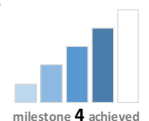


● standard → standard ► same

**ELETROBRAS (2011)**  
*Violation of indigenous peoples' rights*

Brazil

Eletrobras should recognise the rights of indigenous peoples as stipulated in relevant international norms. The company should also ensure that resettled people and other people affected by the dam are compensated and consulted in accordance with international norms. Appropriate environmental mitigation programmes should be carried out and verified by an independent third party.



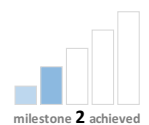
● good ↗ good ▲ same

**GRUPO MEXICO (2016)**  
*Human rights violations in mining project*

Peru



Grupo Mexico should align its practices to the Voluntary Principles on Security and Human Rights, or similar. The company should demonstrate that an adequate and continuous consultation process is being carried out in the communities nearby the project, as well as have a water management system in place for the Tia Maria project, aligned with international standards.

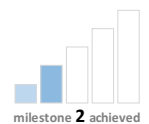


● poor ↘ poor ▼ same

**JBS SA (2015)**  
*Repeated labour rights violations*

United States

JBS should take responsibility for addressing the frequent health and safety (H&S) incidents at its subsidiaries. It should further develop H&S policies and practices aligned with ILO standards, and ensure their enforcement across the group. This should include proactively assessing risks and mitigating hazards, and be complemented with an appropriate disclosure.

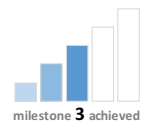


● standard ↘ poor ► same

**PETROBRAS (2015)**  
*Corrupt practices*

Brazil

Petrobras should ensure that the bribery scheme has been investigated thoroughly and it should cooperate with the investigating authorities. Its anti-corruption programme should be strengthened in order to reflect its corruption risk exposure. Allocated resources, implementation, corrective actions and external verification in relation to the programme should be communicated.

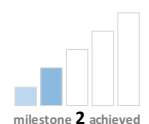


● standard → standard ► same

**SOUTHERN COPPER CORPORATION (2016)**  
*Human rights violations in mining project*

Peru

SCC should align its practices to the Voluntary Principles on Security and Human Rights, or similar. The company should demonstrate that an ongoing and adequate consultation process is in place in the communities nearby the project, as well as have a water management system in place for the Tia Maria project, aligned with international standards.



● standard ↘ poor ► same

VALE SA (2016)

*Environmental and human rights  
violations caused by dam collapse*

Brazil

Vale should identify the cause(s) of the dam failure, assess all dams within its control to prevent similar failures in the future; develop a remedial strategy for the affected communities and the environment; ensure dam monitoring and maintenance systems and emergency procedures are in place.

● good

→ standard

▲ same



## EVALUATE LIST

BRASKEM SA, BRF SA, COMPANHIA SIDERURGICA NACIONAL, ECOPETROL, GERDAU PN, GRUPO MEXICO, JBS SA, MEXICHEM SAB DE CV, PETROBRAS, SUZANO PAPEL E CELULOSE

# EUROPE

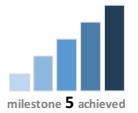
## RESOLVED LIST

**HENNES & MAURITZ (2010)**  
Recurring violations in the cotton supply chain

Uzbekistan

### Change objective

H&M has taken appropriate measures to trace its cotton back to the source in order to proactively address social risks at different stages within its supply chain. The company has tried to ensure that it does not source any cotton originating from Uzbekistan, or otherwise produced using forced labour.



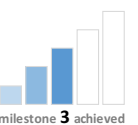
## ENGAGE LIST

**ANDRITZ AG (2010)**  
Supplying to dam projects resulting in breaches of international standards

Turkey

### Change objective

Andritz should adopt corporate policies that address environmental and social risks in infrastructure projects. The policies should advocate a precautionary approach and require that projects comply with internationally proclaimed environmental and social standards.

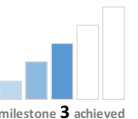


● standard → poor ► same

**BARRY CALLEBAUT AG (2010)**  
Child labour in the cocoa industry

Ivory Coast

Barry Callebaut should roll out a system to identify and remediate cases of child labour in its cocoa supply chain to a majority of its farmer base in Ivory Coast and Ghana by 2020, and ensure continuous roll-out beyond 2020 to eventually cover its entire farmer base in the two countries. The company should also demonstrate progress towards a living income for farmers in Ivory Coast and Ghana.

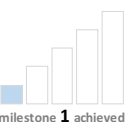


● standard → standard ► same

**BRITISH AMERICAN TOBACCO (2017)**  
Labour rights violations on tobacco farms

United Kingdom

BAT should ensure proper implementation of the Sustainable Tobacco Programme and enforce the ban on child labour in practice. The company should provide regular trainings on the main pillars of the Programme including child labour prevention and safe working environment. BAT should conduct regular monitoring in the supply chain for child labour and other human rights risks. Progress on the Programme implementation should be reported publicly.

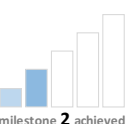


● good → standard ▲ new

**DEUTSCHE POST (2015)**  
Anti-union practices

India

Deutsche Post should ensure its Code of Conduct is observed throughout its global operations, including subsidiaries. This refers to the CoC generally and freedom of association specifically. DP should ensure it has accurate processes to manage employee complaints, and report more transparently on the number of complaints and the measures taken to ensure compliance with the code.

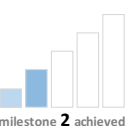


● standard → standard ► same

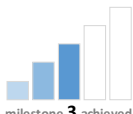
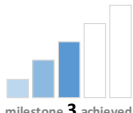
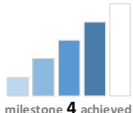
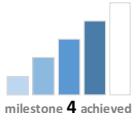
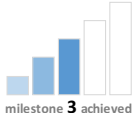
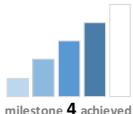
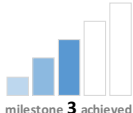
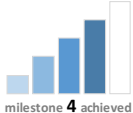
**DEUTSCHE TELEKOM (2016)**  
Anti-union practices at subsidiary

United States

Deutsche Telekom should ensure that the alleged practices of hindering freedom of association at T-Mobile US (TMUS) will cease and the subsidiary will engage in a dialogue with employees supporting unionisation. Deutsche Telekom should assure that TMUS' management of labour rights is aligned with the ILO core conventions.



● standard → standard ► same

<b>ENI (2015)</b> <i>Corrupt practices</i>	Nigeria	ENI should demonstrate that its code of conduct, due diligence and risk management processes in the areas of acquisitions and divestments are robust and universally applied.	 milestone 3 achieved
● standard → standard ► same			
<b>FERROVIAL (2015)</b> <i>Human rights violations in various countries</i>	Nauru	Ferrovial should adhere to international human rights standards and comply with the UNHCR's recommendations to provide those detained within the centres with humane conditions. Ultimately, the company should end its involvement in the detention centres.	 milestone 3 achieved
● good → standard ▲ better			
<b>G4S (2011)</b> <i>Human rights violations in occupied territories</i>	Palestine	G4S should properly investigate and address its activities allegedly in breach of International Humanitarian Law. The company should implement measures to prevent such allegations in the future and improve the risk assessment of its activities in high risk zones.	 milestone 4 achieved
● excellent ↗ good ▲ same			
<b>GLAXOSMITHKLINE (2015)</b> <i>Corrupt practices</i>	China	GlaxoSmithKline should improve its anti-corruption programme in order to reflect its corruption risk exposure. The anti-corruption programme should be transparent in terms of allocated resources, implementation, follow-up mechanisms, corrective actions and external verification.	 milestone 4 achieved
● standard → standard ► same			
<b>GLENCORE PLC (2015)</b> <i>Operations in occupied territory</i>	Western Sahara	Glencore should demonstrate how its activities in Western Sahara are in line with the interests and wishes of Saharawis, in accordance with the right to self-determination stipulated in the International Covenant on Civil and Political Rights and International Covenant on Economic, Social and Cultural Rights. Should this not be possible, the company should withdraw from Western Sahara.	 milestone 3 achieved
● standard → standard ► better			
<b>GLENCORE PLC (2013)</b> <i>Environmental impact from pollution incidents</i>	Australia	Glencore should show that lead from the Mt Isa Mine is no longer a concern to the local community and should manage any issues in an appropriate manner. At McArthur River, there should be a costed and practical remediation plan for the mine addressing potential legacy issues e.g. acid rock discharge.	 milestone 4 achieved
● standard → standard ► same			
<b>HEIDELBERGCEMENT (2015)</b> <i>Violations of international law in occupied territories</i>	Palestine	HeidelbergCement should be able to demonstrate that its operations on Occupied Palestinian Territory are in compliance with international humanitarian law. A structured dialogue with relevant stakeholders as well as an effective grievance mechanism are key elements needed to achieve that.	 milestone 3 achieved
● excellent ↗ good ▲ same			
<b>HSBC HOLDINGS (2016)</b> <i>Recurring incidents of money laundering in various countries</i>	United States	HSBC should implement systems and controls that prevent financial crime and money laundering and demonstrate that they are robust and universally applied.	 milestone 4 achieved
● good → standard ▲ same			

<b>KGHM (2017)</b> <i>Recurring fatal accidents</i>	Poland	KGHM should ensure it has internationally recognised health and safety policies, procedures and training for its workforce and suppliers.	<div><div></div><div>3 months</div><div>low performance</div></div> <div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><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<b>ROYAL DUTCH SHELL (2015)</b> <i>Corrupt practices</i>	Nigeria	Shell should demonstrate that its code of conduct, due diligence and risk management processes in the areas of acquisitions and divestments are robust and universally applied.	<div> <div>● standard → standard ► same</div> </div>
<b>ROYAL DUTCH SHELL (2009)</b> <i>Human rights violations resulting from pollution and environmental damage</i>	Nigeria	Shell should have a detailed program in place to address the recommendations of the UNEP's Environmental Impact Assessment of Ogoniland, and demonstrate that regular progress is being made towards achieving the objectives. The company should communicate the plan and progress transparently to shareholders. Shell should also exert its influence on all stakeholders to counter oil theft activity and its related social and environmental impacts.	<div> <div>● good → standard ▲ same</div> </div>
<b>SIEMENS (2017)</b> <i>Operations in occupied territory</i>		Siemens should demonstrate how its activities in Western Sahara are in line with the interests and wishes of Saharawis, in accordance with the right to self-determination stipulated in the International Covenant on Civil and Political Rights and International Covenant on Economic, Social and Cultural Rights. Should this not be possible, the company should withdraw from Western Sahara.	<div> <div>● standard → poor ► same</div> </div>
<b>TELIA COMPANY AB (2012)</b> <i>Corrupt practices</i>	Uzbekistan	Telia Company should deploy an anti-corruption programme adapted to its corruption risk exposure. The anti-corruption programme should be transparent in terms of allocated resources, implementation, follow-up mechanisms, corrective actions and external verification.	<div> <div>● excellent ↗ good ▲ same</div> </div>
<b>VINCI (2015)</b> <i>Exploitation of migrant workers</i>	Qatar	Vinci should adopt a human rights policy in line with the UN Global Compact and the basic ILO conventions on labour rights. The policy should cover the company's worldwide operations, including subsidiaries and subcontractors. In addition, the company should make sure it has the appropriate systems in place to make sure the policy is followed at all its operations.	<div> <div>● good ↗ good ▲ same</div> </div>
<b>VOLKSWAGEN (2016)</b> <i>Environmental impact caused by emissions defeat device</i>	United States	VW should ensure the Supervisory Board has the necessary skills and independence and ensure oversight of the company's risk and its management systems. Furthermore, VW needs to appoint a management board executive accountable for environment and consumer protection.	<div> <div>● standard → standard ► better</div> </div>
<b>VTB BANK (2011)</b> <i>Financing of project with environmental risks</i>	Armenia	VTB Bank should strengthen its risk assessment process and monitoring process in large projects and should sign the Equator Principles. The company should also ensure that the operating company, Vallex Group, adopts a precautionary principle approach since the mining project is located in a sensitive biodiversity area.	<div> <div>● standard → standard ► same</div> </div>

# EVALUATE LIST


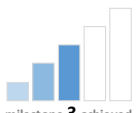
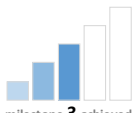
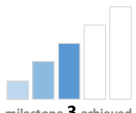
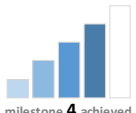
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# DISENGAGE LIST

<b>AIRBUS GROUP</b> <i>Nuclear weapons programmes</i>	France
<b>BAE SYSTEMS</b> <i>Nuclear weapons programmes</i>	United Kingdom
<b>LEONARDO SPA</b> <i>Nuclear weapons programmes</i>	France
<b>SAFRAN GROUP</b> <i>Nuclear weapons programmes</i>	France

# MIDDLE EAST

## ENGAGE LIST

		Change objective	
<b>AKBANK (2010)</b> <i>Financing of a dam project resulting in breaches of environmental standards</i>	Turkey	Akbank should adopt corporate policies that address environmental and social risks in infrastructure projects. The policies should advocate a precautionary approach and require that projects comply with internationally proclaimed environmental and social standards.	 milestone 4 achieved
<div> <span>● standard</span> <span>→ poor</span> <span>▶ same</span> </div>			
<b>BANK HAPOALIM (2010)</b> <i>Financing of illegal settlements in occupied territories</i>	Palestine	Bank Hapoalim should cease providing financial support to activities that are linked to violations of the Fourth Geneva Convention. The bank should adopt a corporate policy that supports the protection of internationally proclaimed human rights and the humanitarian law.	 milestone 3 achieved
<div> <span>● good</span> <span>↓ none</span> <span>▶ same</span> </div>			
<b>BANK LEUMI (2010)</b> <i>Financing of illegal settlements in occupied territories</i>	Palestine	Bank Leumi should cease providing financial support to activities that are linked to violations of the Fourth Geneva Convention. The bank should adopt a corporate policy that supports the protection of internationally proclaimed human rights and the humanitarian law.	 milestone 3 achieved
<div> <span>● good</span> <span>↓ none</span> <span>▶ same</span> </div>			
<b>MIZRAHI TEFAHOT BANK LTD (2010)</b> <i>Financing of illegal settlements in occupied territories</i>	Palestine	Mizrahi Tefahot Bank should cease providing financial support to activities that are linked to violations of the Fourth Geneva Convention. The bank should adopt a corporate policy that supports the protection of internationally proclaimed human rights and the humanitarian law.	 milestone 3 achieved
<div> <span>● good</span> <span>↓ none</span> <span>▶ same</span> </div>			
<b>TURKIYE GARANTI BANKASI (2010)</b> <i>Financing of a dam project resulting in breaches of environmental standards</i>	Turkey	Turkiye Garanti Bankasi should adopt corporate policies that address environmental and social risks in infrastructure projects. The policies should advocate a precautionary approach and require that projects comply with internationally proclaimed environmental and social standards.	 milestone 4 achieved
<div> <span>● good</span> <span>→ standard</span> <span>▲ same</span> </div>			

## EVALUATE LIST

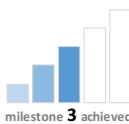
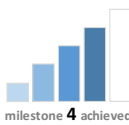
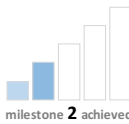

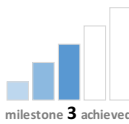
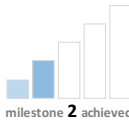
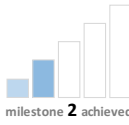
GLOBAL TELECOM HOLDING SAE

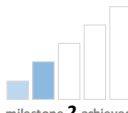
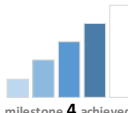
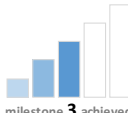
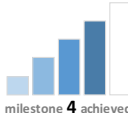
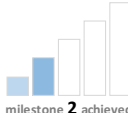
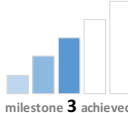
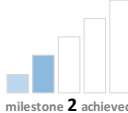
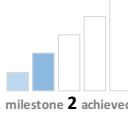
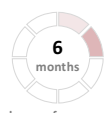
# DISENGAGE LIST

<b>ELBIT SYSTEMS</b> <i>Security systems for illegal separation barrier in occupied territories</i>	Palestine
<b>TURKIYE HALK BANKASI</b> <i>Financing of a dam project resulting in breaches of environmental standards</i>	Turkey

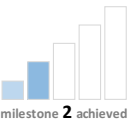
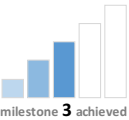
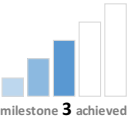
# NORTH AMERICA

## ENGAGE LIST

		Change objective	
<b>AGRIUM (2014)</b> <i>Operations in occupied territory</i>	Western Sahara	Agrium should create and implement a plan on how to cease its imports of phosphates from Western Sahara, or demonstrate how the exploitation is in line with the interests and wishes of Saharawis, in accordance with the right to self-determination stipulated in the International Covenant on Civil and Political Rights and International Covenant on Economic, Social and Cultural Rights.	 milestone 3 achieved
● standard    ↘ poor    ► same			
<b>APPLE INC (2009)</b> <i>Labour rights violations at suppliers</i>	Taiwan	Apple should prevent labour rights violation in its supply chain and ensure that its commitments on labour rights are implemented and fulfilled throughout the organisation and its suppliers. The company should be more transparent about the actions it takes towards incidents and engage in stakeholder dialogue.	 milestone 4 achieved
● poor    ↗ good    ► same			
<b>BARRICK GOLD CORP (2009)</b> <i>Human rights violations in mining operation</i>	Papua New Guinea	Barrick should demonstrate that an effective remedy framework is in place to compensate women who were sexually abused by security personnel at Porgera. The company should also demonstrate compliance with the Voluntary Principles on Security and Human Rights. Policies and procedures should be aligned with international standards on resettlement and compensation.	 milestone 2 achieved
● good    ↗ good    ▲ same			
<b>BARRICK GOLD CORP (2009)</b> <i>Environmental impacts from waste practices</i>	Papua New Guinea	Barrick should manage its tailings at Porgera responsibly and commit to remediating the impacted environment. Barrick should address the remediation required of the two erodible dumps to prevent sediment wash into the river, and address long-term potential legacy issues e.g. acid mine discharges.	 milestone 4 achieved
● standard    → standard    ► same			
<b>CROWN HOLDINGS (2016)</b> <i>Anti-union practices in several countries</i>	Turkey	Crown Holdings needs to make sure that its policies and processes are in compliance with ILO conventions referring to the right to organise and collective bargaining.	 milestone 3 achieved
● poor    → standard    ► same			
<b>ENBRIDGE (2016)</b> <i>Violations of indigenous peoples' rights</i>	United States	Enbridge should enter in to a reconciliation dialogue with Standing Rock, with the objective to reach an agreement on how to improve trust and collaboration related to similar project in the future, as well as mitigation measures by the company to minimise risks and impacts on Standing Rock's territory and population, including its water resources.	 milestone 2 achieved
● good    ↘ poor    ► better			
<b>FREEPORT MCMORAN (2009)</b> <i>Environmental impacts from waste practices</i>	Indonesia	Freeport should manage its tailings at Grasberg responsibly and commit to remediating the impacted environment. Freeport should address the remediation required of the two erodible dumps to prevent sediment wash into the river, and address long-term potential legacy issues e.g. acid mine discharges.	 milestone 2 achieved
● good    → standard    ▲ same			

<b>FREEMPORT MCMORAN (2009)</b> <i>Human rights violations by security forces</i>	Indonesia	Freeport should demonstrate that its regular payments to Indonesian police and military are being administered in a fully transparent manner and do not contribute to human rights abuses. The company should demonstrate implementation of the Voluntary Principles on Security and Human Rights.	 milestone 2 achieved
● standard → standard ► same			
<b>GOLDCORP (2008)</b> <i>Violations of indigenous peoples' rights</i>	Guatemala	Goldcorp should, as a part of integrating human rights due diligence at its operations, ensure adequate representation of indigenous communities in all consultation processes and implement grievance mechanisms. As requested in the revised precautionary measures by the Inter-American Commission on Human Rights, Goldcorp should provide local communities with potable water of good quality.	 milestone 4 achieved
● standard ↗ good ▲ worse			
<b>HERSHEY (2010)</b> <i>Child labour in cocoa industry</i>	Ivory Coast	Hershey should roll out a system to identify and remediate cases of child labour in its cocoa supply chain to a majority of its farmer base in Ivory Coast and Ghana by 2020, and ensure continuous roll-out beyond 2020 to eventually cover its entire farmer base in the two countries. The company should also demonstrate progress towards a living income for farmers in Ivory Coast and Ghana.	 milestone 3 achieved
● standard → standard ► same			
<b>MATTEL (2010)</b> <i>Poor working conditions at supplier factories</i>	China	Mattel should prevent labour rights violations in its supply chain through effective implementation and proactive enforcement of its Responsible Supply Chain Standards at all Mattel-owned factories as well as vendors. The company should also be more transparent about the auditing process and findings.	 milestone 4 achieved
● good → standard ▲ better			
<b>MCDONALD'S CORP (2015)</b> <i>Labour rights violations at franchisees</i>	United States	McDonald's should actively promote the company's Standard of Business Conduct among its franchisees, and ensure franchisees live up to this especially with regards to labour rights. Efforts taken by the company to ensure compliance in this area should be transparently reported to relevant stakeholders.	 milestone 2 achieved
● standard ↘ poor ► same			
<b>MONDELEZ INTERNATIONAL (2009)</b> <i>Child labour in the cocoa industry</i>	Ghana	Mondelez should roll out a system to identify and remediate cases of child labour in its cocoa supply chain to a majority of its farmer base in Ivory Coast and Ghana by 2020, and ensure continuous roll-out beyond 2020 to eventually cover its entire farmer base in the two countries. The company should also demonstrate progress towards a living income for farmers in Ivory Coast and Ghana.	 milestone 3 achieved
● excellent ↗ good ▲ same			
<b>PHILLIPS 66 (2016)</b> <i>Violations of indigenous peoples' rights</i>	United States	The company should enter in to a reconciliation dialogue with Standing Rock, with the objective to reach an agreement on how to improve trust and collaboration related to similar project in the future, as well as mitigation measures by the company to minimise risks and impacts on Standing Rock's territory and population, including its water resources.	 milestone 2 achieved
● standard ↓ none ► same			
<b>POTASH CORP SASKATCHEWAN (2010)</b> <i>Operations in occupied territory</i>	Western Sahara	PotashCorp should create and implement a plan on how to cease its imports of phosphates from Western Sahara, or demonstrate how the exploitation is in line with the interests and wishes of Saharawis, in accordance with the right to self-determination stipulated in the International Covenant on Civil and Political Rights and International Covenant on Economic, Social and Cultural Rights.	 milestone 2 achieved
● poor ↓ none ▼ same			
		 6 months low performance	



<b>T-MOBILE US (2016)</b> <i>Anti-union practices</i>	United States	T-Mobile US (TMUS) should cease the alleged practices of hindering freedom of association at the company and engage in a dialogue with employees supporting unionisation. The company should adhere to the US National Labor Relations Board's decisions. TMUS' management of labour rights should be aligned with the ILO core conventions.	 milestone <b>2</b> achieved
● standard → standard ► same			
<b>WAL-MART STORES (2017)</b> <i>Labour rights violations in various countries</i>	United States	Wal-Mart should cease and mitigate non-compliance in areas related to labour rights and strengthen its policies and guidelines on these issues.	 milestone <b>3</b> achieved
● standard → standard ► better			
<b>WELLS FARGO &amp; CO (2016)</b> <i>Workplace harassment and retaliation</i>	United States	Wells Fargo should ensure that it implements and monitors systems and procedures that protect employees from workplace harassment and from retaliation in cases where misconduct is reported. To support these systems and procedures, Wells Fargo should re-align its corporate culture so as to regain a sense of purpose and integrity, to redefine banking and restore trust with customers, employees and other stakeholders.	 milestone <b>3</b> achieved
● good → standard ▲ better			

## EVALUATE LIST

AMAZON.COM, ARCHER DANIELS MIDLAND, BARRICK GOLD CORP, BOMBARDIER INC, BRISTOL-MYERS SQUIBB CO, BUNGE LIMITED, CISCO SYSTEMS, COGNIZANT TECHNOLOGY COLGATE-PALMOLIVE, COSTCO WHOLESALE CORP, EXXON MOBIL, GENERAL ELECTRIC, GENERAL MOTORS, GOODYEAR TIRE & RUBBER, HASBRO, JM SMUCKER COMPANY, JOHNSON & JOHNSON, KELLOGG CO, LOCKHEED MARTIN, MCDONALD'S CORP, MERCK & CO, PEPSICO, PROCTER & GAMBLE CO, RESTAURANT BRANDS INTL INC, THE WILLIAMS COMPANIES, TRANSCANADA CORP, TWENTY-FIRST CENTURY FOX, TYSON FOODS, WAL-MART STORES, VF CORP, ZIMMER BIOMET HOLDINGS INC

# DISENGAGE LIST

**BOEING CO** United States  
*Nuclear weapons programmes*

**CHEVRON** Ecuador  
*Environmental damage in Amazon jungle*

**FLUOR CORP** United States  
*Nuclear weapons development*

**GENERAL DYNAMICS CORP** United States  
*Nuclear weapons programmes*

**HONEYWELL INTERNATIONAL** United States  
*Nuclear weapons programmes*

**HUNTINGTON INGALLS INDUSTRIES** United States  
*Nuclear weapons development*

**INNOPHOS HOLDINGS** Western Sahara  
*Operations in occupied territory*

**JACOBS ENGINEERING GROUP** United Kingdom  
*Nuclear weapons programmes*

**LOCKHEED MARTIN** United Kingdom  
*Nuclear weapons programmes*

**MOTOROLA SOLUTIONS** Palestine  
*Human rights violations in occupied territories*

**NORTHROP GRUMMAN CORP** United States  
*Nuclear weapons programmes*

**RAYTHEON COMPANY** United States  
*Nuclear weapons programmes*

**TEXTRON** United States  
*Involvement in cluster munitions*

# OCEANIA

## RESOLVED LIST

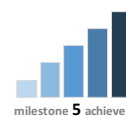
**RIO TINTO**

*Corrupt practices*

Guinea

### Change objective

Rio Tinto has provided evidence of implementation of the anti-corruption policy through structural reorganisation and improved training programmes and monitoring. The internal investigation into the Simandou payments has the scope to review any other irregular payments made between 2008 and 2015. The company has acted upon “claw-back” conditions within a former CEO’s remuneration package, subject to the findings of the internal investigation.



## ENGAGE LIST

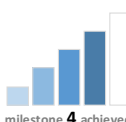
**BHP BILLITON (2016)**

*Environmental and human rights violations caused by dam collapse*

Brazil

### Change objective

BHP needs to identify the cause(s) of the dam failure; assess all dams within its control to prevent similar failures in the future; develop a remedial strategy for the affected communities and the environment; ensure dam monitoring and maintenance systems and emergency procedures are in place.



● good ↗ good ▲ same

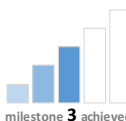
**INCITEC PIVOT LTD (2009)**

*Operations in occupied territory*

Western Sahara



IPL should create and implement a plan on how to cease its imports of phosphates from Western Sahara, or demonstrate how the exploitation is in line with the interests and wishes of Saharawis, in accordance with the right to self-determination stipulated in the International Covenant on Civil and Political Rights and International Covenant on Economic, Social and Cultural Rights.



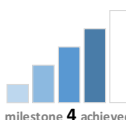
● poor ↓ none ▼ same

**RIO TINTO (2008)**

*Environmental impacts from waste practises*

Indonesia

Rio Tinto should exert pressure on Freeport to ensure responsible management of tailings and to address potential long-term legacy issues at Grasberg. Rio Tinto should adopt a policy of prohibiting the future use of riverine tailings disposal.



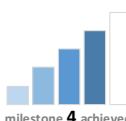
● good → standard ▲ better

**WESFARMERS (2007)**

*Operations in occupied territory*

Western Sahara

Wesfarmers/CSBP should commit to entirely and permanently ending its imports of phosphate rock from Western Sahara, in accordance with the right to self-determination stipulated in the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.



● standard ↗ good ▲ same

## EVALUATE LIST

RIO TINTO, WOOLWORTHS LTD



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