

| Company | Industry | Express Reference | Link | International Frameworks Recognised | Incorporation and Assurance of Human Rights | The Term 'Human Rights D | Any Human Rights Due diligence process? | | | |
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| Banco Galicia | Finance | No | www.bancogalicia.com/ | | | | | | | |
| ANZ | Finance | Yes | http://www.anz.com/resources/77777ae69004d7182bfae8da32c55cda98/ANZ_HumanRights.pdf?MOD=AJPERES | Guiding Principles , Global Compact, Universal Declaration on HR, ILO conventions | Our human rights framework consists of staff training and communication programs, monitoring and reporting systems and grievance procedures. | The term DD is used only once : "We continue to embed the standards into our business practices including training, communications, contracts, agreements, and due diligence processes. " Not clear if this DD refers to HRDD | General and vague methods. Training in relation to human rights. External experts periodically assess their system for adequate human rights compliance. Employee feedback and chat forums. However no specific human rights committee to deal with issues. Pledged to include their methods in their annual corporate responsibility reports however, last report dates back to 2007. | | | |
| EFIC | Finance | No | http://www.efic.gov.au/ | | | | | | | |
| National Australia Bank | Finance | Yes | http://cr.nab.com.au/docs/gr-final-210114.pdf | Global Compact, Universal Declaration on HR | Has not incorporated any company-specific methods. Heavily reliant on the broad guidelines. "We have established a series of global policies and initiatives which support and uphold our commitment to the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and the Universal Declaration of Human Rights. Importantly, human rights is a key consideration in the development of policies impacting our people, such as in the areas of diversity, health and safety and equal opportunity. Additionally we consider human rights in our lending and sourcing activity through our ESG Risk Principles and through application of Equator Principles to all project financing. Further information on our approach to human rights can be found in our most recent UN Global Compact (UNGC) Communication on Progress." | No | No | | | |
| Westpac | Finance | Yes | http://www.westpac.com.au/about-westpac/sustainability-and-community/our-community/human-rights/ | Global Compact, Universal Declaration on HR, ILO conventions | Our main responsibilities lie in a number of critical areas: Employee rights, The right to access finance for vulnerable and disadvantaged members of the community, The risk of human rights violations within our supply chain. However there is no mention of how they ensure all this. | No | | | | |
| Commonwealth Bank | Finance | No | https://www.commbank.com.au/sustainability2014/index.html | Global Compact | | | | | | Guiding Principles |
| BHP Billiton | Mining | Yes | http://www.bhpbilliton.com/home/investors/reports/Documents/2014/BHPBillitonAnnualReport2014.pdf | Global Compact, Universal Declaration on HR, Voluntary Principles on Security and Human Rights | Our human rights due diligence process requires our operations to identify and document key potential human rights risks by completing a human rights impact assessment (HRIA). This includes assessing performance against the articles of the UN Universal Declaration of Human Rights, the UN Global Compact principles and host country legislation governing human rights issues. We require each HRIA to be reviewed on an annual basis. Every three years, each HRIA is required to be verified through an engagement process with stakeholders and, in medium and high-risk jurisdictions, by a qualified human rights specialist. Where a HRIA identifies a material risk, a human rights management plan is required to be implemented and reviewed annually. Selected employees and contractors receive training on how to comply with our human rights commitments. | Yes | HRDD taken as part of the general DD. The HRDD requires operations to identify and document key potential HR risks by completing a HRIA | | | Global Compact |
| Minerals and Metals Group | Mining | Yes | http://www.mmg.com/en/Our-Operations/Mining-operations/Kinsevere/living-in-the-community/Human-Rights.aspx | | The webpage on human rights simply states: "MMG is committed to respecting and supporting the UDHR". They have however case studies in the 2013 report and seem to concentrate all their HR work at one mine Kinsevere in DRC. | No | No | | | Universal Declaration on HR |
| Woodside | Oil and Natural Gas | Yes | http://www.woodside.com.au/Working-Sustainably/Society/Pages/Respecting-Human-Rights.aspx#VTnlv_nQRF | Universal Declaration on HR | Very general statement. "As our international portfolio grows we recognize and respect the basic human rights of all people, and we seek to ensure that we are not complicit in human rights abuses committed by others. | No | No | | | ILO conventions |
| OMV | Oil and Natural Gas | Yes | http://www.omv.com/portal/01/com/omv/OMV_Group/Sustainability/Our_Approach/Human_Rights | Global Compact | process is explained in detail. To manage our human rights risks we gather as much information as we can on the socio-economic conditions in a country or area which we consider to enter. The OMV "New Country Entry Check" is a checklist used to assess the human rights situation in potential operating areas. It helps to identify and avoid the risk of involvement in human rights violations before entering a new country. All investment decisions requiring Executive Board approval undergo a mandatory sustainability evaluation that includes human rights aspects. We have developed a mandatory human rights questionnaire for standard OMV supplier audits and have trained auditing teams how to use it. We conduct human rights training programs to maintain and raise the level of awareness among our contractors. An external human rights consultant together with OMV management carries out human rights training for security forces. | No | "In order to actively foster human rights in our sphere of influence, we have developed a mandatory human rights questionnaire for standard OMV supplier audits and have trained auditing teams how to use it. We conduct human rights training programs to maintain and raise the level of awareness among our contractors. These programs, often conducted by an external human rights consultant, are based on the standards recommended by the UN Global Compact and OMV Human Rights Matrix." | | | International Convention on Civil/Political Rights |
| Ahli United Bank | Finance | No | http://www.ahliunited.com/index.html | | | No | No | | | Independent HR Policy Based on Own Business Code |

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| KBC Group | Finance | Yes | https://multimediafiles.kbcgroup.eu/ng/published/KBCCOM/PDF/COM_BDV.pdf_CSR_Report_2013.pdf? | Guiding Principles, Global Compact, ILO conventions, Universal Declaration on HR | Very general statements in their Corporate Responsibility Policy Towards Suppliers: "KBC expects the suppliers it works with to apply the provisions of these conventions, laws and regulations in the same way. The following violations, among others, will be regarded as breaking points: slavery, deprivation of liberty and human trafficking, torture and inhuman treatment, property theft." : https://multimediafiles.kbcgroup.eu/ng/PUBLISHED/KBCCOM/PDF/COM_PVG.pdf_CSR_responsibility_nalivv FN.pdf | Ambiguous | No | | | | | | |
| AB InBev | Food and Beverage | Yes | http://www.ab-inbev.com/social-responsibility/people/global-human-rights-policy.html | Global Compact, ILO conventions, Universal Declaration on HR | Have a HR Policy which says: "As a signatory to the United Nations (UN) Global Compact, we are committed to business practices that do not infringe on human rights and do align with various international standards of responsible business conduct, including the Universal Declaration of Human Rights and the International Labor Organization's Declaration on the Fundamental Principles and Rights at Work . AB InBev's Global Human Rights Policy ("Policy") sets out standards, expectations, and commitments in relation to our responsibility to respect human rights in our own operations and to not knowingly contribute to the violations of human rights by other parties. To that end, our commitment to human rights applies to all AB InBev operations and to full-time, part-time, and temporary AB InBev employees and independent contractors. It also applies to any subsidiaries or joint ventures where AB InBev has a majority interest or management control; in those instances where AB InBev does not have a majority interest or management control, we encourage our business partners to abide by the principles in this Policy." | No | No; just general statement of adherence to local, national and supranational laws and regulations relating to and impacting the exercise of human rights. | | | | | | Voluntary Principles on Security and Human Rights |
| Banco Bradesco | Finance | No | http://www.bradesco.com.br/html/classic/index.shtml | | | | | | | | | | |
| Banco do Brasil | Finance | Yes | http://www.bb.com.br/docs/pub/siteEsp/ri/eng/dce/dwn/GovCode.nrf | Global Compact | Simply refers to the Global Compact | No | | | | | | | |
| CAIXA Economica Federal | Finance | No | | | | | | | | | | | |
| Itau | Finance | Yes | https://www.itau.com.br_ar/quivosestaticos/RJ/pdf/SUSTAINABILITYeng.pdf?title=Sustainabilidad%20Polivv | Independent HR Policy Based on Own Business Code | Very brief statement. - protect and respect the human rights in the relationship with clients and suppliers, refuting the types of forced, compulsory or child labor; | No | | | | | | | |
| JBS | Food and Beverage | No | | | | | | | | | | | |
| Vale | Mining | Yes | http://www.vale.com/australia/EN/aboutvale/sustainability/people/Documents/FINAL%20VALlaminaires-110110_chi.pdf | Universal Declaration on HR | We seek to maintain a detailed knowledge of territories where we operate or intend to operate. However, no explanation as to their procedure. Reporting Channel to receive reports and information, including on possible violations of human rights. In addition, we offer on our website the "Contact Us" communication channel, which addresses the Sustainability category, to provide information and clarify questions about human rights and other issues | No | | | | | | | |
| Petrobras | Oil and Natural Gas | Yes | http://www.investidorpetrobras.com.br/en/petrobras-joined-the-united-nations-global-compact.htm | Global Compact | Vague statements such as: "We support projects that contribute to the reduction of poverty and social inequality, promoting the protection of human rights and ensuring access to culture and sports." and "Respect for human and cultural diversity and non-discrimination are principles that are essential to us." : http://www.petrobras.com/en/environment-and-society/valuing-diversity/ | No | | | | | | | |
| SNH | Oil and Natural Gas | No | | | | | | | | | | | |
| Bank Of Montreal | Finance | Yes | http://www.bmo.com/cr/images/HumanRightsOct2011.pdf | Universal Declaration on HR | Very general statement. BMO respects its human rights responsibilities and complies with laws and internationally recognized human rights everywhere it operates. For example, in Canada, human rights obligations are expressed in the Canadian Human Rights Act, the Employment Equity Act, and the Canadian Charter of Rights and Freedoms. | No | | | | | | | |

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| CIBC | Finance | No | https://www.cibc.com/ca/pdf/investor/cibc-2013-cr-report-full.pdf | | Has general statements: "CIBC supports and respects the protection of human rights in all jurisdictions in which we operate. We comply with human rights and/or non-discrimination legislation addressing issues such as pay equity, employment equity, discrimination and harassment based on protected characteristics, such as race, religion, age, gender, disability, and sexual orientation". Also provides that "CIBC Asset Management (CAM) manages a number of equity and fixed-income portfolios with specific mandates that adhere to SRI/ESG guidelines. These SRI/ESG portfolios shall not hold securities of any company whose primary business is the sale of tobacco or alcohol products or is a supplier of weaponry, or if it has major operations in countries that disregard human | | | | | | |
| Export Development Canada | Finance | Yes | http://www.edc.ca/EN/AboutUs/Corporate-Social-Responsibility/Documents/human-rights-statement.pdf | Universal Declaration on HR | EDC's Political Risk Assessment Department routinely conducts country- and project-level political risk assessments that include an analysis of factors that influence human rights conditions in host countries. An additional layer of due diligence will be undertaken for investment projects and countries assessed to have a higher potential for human rights issues. However, no further explanation given. | | | | | | |
| Manulife Financial | Finance | No | https://www.manulife.ca/wps/portal/manulife/Manulife.caHome/Home/lut/p/b1/04_Sj9CPykssy0xPLMmzDvMafGjzQJ9vZycjN1MTQwsTE2NDdDx9TF0CvYzNDQ3cjYAKioEKDHAA RwNC-gP1o8BK3D0NwbDwrwsTAyM3Aw8TYMNTMzMYzdA42hCvBY4eeRn5uqX5AbY2B4qgIANnDdigI/dl4/d5/LzdBISevZ0FBIS | | | No | | | | | |
| Royal Bank of Canada | Finance | Yes | http://www.rbc.com/community-sustainability/assets-custom/pdf/RBC-CRR-Report-e.pdf | Canadian Human Rights Act | Their ask suppliers to provide details on their commitment to responsible environmental management, employee health and safety, ethical business practices, compliance with their standards and workforce diversity. No further information as to how they verify the accuracy of the information or initiatives to conduct investigation themselves or through an external auditor is stated. | No | | | | | |
| Scotiabank | Finance | Yes | http://www.scotiabank.com/ca/en/0_418_00.html | Global Compact, ILO conventions, Universal Declaration on HR, Canadian Human Rights Act | HR in the context of the workplace. "Scotiabank is committed to an inclusive and accessible workplace globally where employees are treated equitably and with respect. The Bank's commitment highlights the importance placed on a workplace free from discrimination and provides avenues for employees to address such discrimination." | | | | | | |
| TD | Finance | Yes | http://www.tdcanadatrust.com/easyweb5/crr-2011/workplace/human_rights/index.jsp | Universal Declaration on HR, Independent HR Policy Based on Own Business Code | In the CSR Report 2011, HR falls under 'Labour Codes and HR'. Simply states : We have developed our own policies, guidelines and procedures to protect and promote human rights throughout our operations; for example. Our Harassment, Discrimination and Violence in the Workplace Policy articulates our commitment to providing a work environment free from any form of harassment and unlawful discrimination, where every employee, customer, client, independent contractor and third party is treated with dignity and respect. Diversity is a strategic business initiative. Our objective is to be an inclusive bank – one that understands, honours and values the diversity of customers, employees and the communities in which we live and work. Our mission is to have a unique and inclusive employee culture. | No | | | | | |

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| Barrick Gold | Mining | Yes | http://www.barrick.com/responsibility/human-rights/default.aspx | Guiding Principles , Global Compact | Based on the belief that human rights reflect a set of international legal rights, and consistent with Principle 23 (c) of the Guiding Principles on Business and Human Rights (PDF), our legal department currently oversees our human rights program. It does so by approaching human rights as a form of governance. | Yes | Ask relevant suppliers to periodically provide certifications that they are not aware of any unreported human rights allegations in their work. Where appropriate, we investigate the behavior of existing suppliers and contractors related to human rights issues. Examples and how exactly they investigate would have proven useful. In 2011, they began a project to assess human rights risks and impacts at all of our sites and projects. The project is being overseen by Avanzar independent consulting organization. Fund for Peace, a well-regarded NGO that works to prevent conflict and human rights abuses, serves as an external and independent advisor to the company in this project. The use of independent auditors is noteworthy. Their human rights assessment tool focuses on seven categories such labour and community wellbeing. However, they fail to explain how exactly they assess these areas. Compared to the rest of the companies, their human rights links and web space is very large. They have designated a lot of space and effort to tell the public of their human right commitments. However, it lacks substance in terms of proving methodical evidence. | | | |
| Teck | Mining | Yes | http://www.teck.com/DocumentViewer.aspx?elementId=228726&portalName=tc | Guiding Principles , Global Compact, Universal Declaration on HR, ILO conventions | Their new HRA tool provides a step-by-step approach to integrating human rights considerations at the operational level. This will help us ensure that any risks, negative impacts, or opportunities to improve are identified early so that necessary action can be taken. The HRA covers all human rights issues across six (relevant) categories. In 2011, their developed a comprehensive human rights assessment tool with BSR, which will be piloted at two sites in 2012. All sites will be required to conduct an assessment by 2014, and to update the process annually or when there is a significant change to a site or local context. The process includes engagement with communities of interest (COIs). Human rights are currently considered in their risk assessment processes. However, there is no explanatory comments on what is included in their assessment too | Yes | | | | |
| Goldcorp | Mining | Yes | http://www.goldcorp.com/files/docs_governance/CSR%20Human%20Rights%20Policy.pdf | Universal Declaration on HR, Voluntary Principles on Security and Human Rights | In 2008, Goldcorp commenced a Human Rights Assessment (HRA) at the Marlin mine. The assessment process was guided by the tenets of transparency, independence, and inclusivity and was directed by a Steering Committee made up of a company representative, a representative of a group of socially responsible shareholders that own shares in Goldcorp, and a Guatemalan representative. The primary objective of the HRA was to provide independent assessment of the potential for human rights impacts from the presence and activities of the Marlin Mine, and how Goldcorp's subsidiary Montana Exploradora's policies, procedures, and practices affect the human rights of the population in the area of the mine. The full report on the HRA of the Marlin mine can be accessed at: www.hria-guatemala.com . | Yes | Goldcorp began a multi-phase process of developing and implementing business management practices that will ensure "broader due diligence for human rights" consistent with the "Protect, Respect, Remedy" framework proposed by John Ruggie and adopted by the United Nations Human Rights Council. As part of that process, Goldcorp carefully considered each of the recommendations in the HRA report. The response, published in June 2010, included details on how interested stakeholders could submit ideas, provide feedback, and monitor progress to ensure a transparent and | | | |
| First Quantum Minerals | Mining | No | http://www.first-quantum.com/Home/default.aspx | Universal Declaration on HR, Voluntary Principles on Security and Human Rights, ILO conventions | | | There mention of HR is on the cover of the Sustainability Report which says: "Corporate responsibility is built on a basic respect for human rights and individual values within a diversity of backgrounds and views. Recognising people's unique insights and priorities is the key to inspiring empowerment and self- sufficiency." | | | |
| Talisman Energy | Oil and Natural Gas | Yes | http://www.talisman-energy.com/responsibility/human_rights.html | Universal Declaration on HR, Voluntary Principles on Security and Human Rights, Independent HR Policy Based on Own Business Code | Prior to investment, their perform an extensive evaluation of the technical and economic challenges as well as the commercial, legal, political, regulatory, environmental, security and human rights issues related to any investment opportunity. Their decision to invest is based on these above-ground evaluations as well as their resource assessments. No further explanation on how they do this. | No | | | | |

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| Nexen | Oil and Natural Gas | Yes | http://www.nexencnooctd.com/~media/Files/Governance/Policies/Corporate/Nexen-HumanRight.ashx | Voluntary Principles on Security and Human Rights, Universal Declaration on HR, Guiding Principles | Nexen is working through IPIECA, the global oil and gas industry association for environmental and social issues, to develop a coordinated, effective industry response to the United Nations Guiding Principles. Together with IPIECA's 32 member companies and 14 industry associations, we are enhancing our systems and processes for due diligence and grievance mechanisms, and more clearly communicating our industry's performance when it comes to respecting human rights | No | They assess and manage human rights risk is through a process known as Above Ground Reviews (AGRs). These reviews assess a country's political, security, regulatory and social issues through interviews with government officials, industry operators, journalists, non-governmental organizations and security specialists. However, there is no explanation as to what they have done or hope to achieve from these interviews. Also, are interviews with the people stated above enough? Surely they can easily conceal any evidence of violations during these interviews. | | | |
| Husky Energy | Oil and Natural Gas | No | | | | | | | | |
| SunCor Energy | Oil and Natural Gas | Yes | http://www.suncor.com/pdf/HumanRightsPolicyAug2011.pdf | Guiding Principles, Global Compact, Universal Declaration on HR, ILO conventions, Voluntary Principles on Security and Human Rights | Suncor's Human Rights Policy supports a consistent approach to respecting human rights in the regions in | Yes | All Suncor employees engaged in activities under Suncor's operational control are responsible for the application of their human rights policy. The policy will be reviewed annually and we will provide regular, objective reporting on our progress in our Sustainability Report. There is no mention of their process of human rights due diligence apart from a policy statement which does not show what they have done in practise. The fact that their policy is revised annual is good but there is no evidence of what improvements has been implemented. Case studies would have been useful for the public. | | | |
| Corpbanca | Finance | No | https://www.corpbanca.cl/portal/?id_category=30 | | | No | | | | |
| Codelco | Mining | Yes | http://www.codelco.com/fiip/book/reporte_sustentabilidad/2011/sitio/en/human-rights.html | Global Compact, ILO conventions | Only Method :The Report Line is a space dedicated to reporting noncompliance with the Code of Conduct and Business Ethics, which can be accessed by telephone or on line. It is operated from abroad by the specialist company Ethics Point, guaranteeing security and confidentiality of the information received. It operates 24 hours a day, 7 days a week, 365 days a year. | | | | | |
| Chow Tai Fook Jewellery | Apparel | No | http://www.chowtaifook.com/en/ | | | | | | | |
| Belle International | Apparel | No | | | | | | | | |
| Michael Kors Holdings | Apparel | No | | | | | | | | |
| CIB (Industrial Bank) | Finance | No | | | | | | | | |
| Industrial and Commercial Bank of China | Finance | No | | | | | | | | |
| China Construction Bank | Finance | No | | | | | | | | |
| Agricultural Bank of China | Finance | No | | | | | | | | |
| Bank of China | Finance | No | | | | | | | | |
| China Shenhua Energy | Mining | No | | | | | | | | |
| China Coal Energy | Mining | No | | | | | | | | |
| Aluminum Corp of China | Mining | No | | | | | | | | |
| CNOOC | Oil and Natural Gas | No | http://www.cnooctd.com/ | | | | | | | |
| Bancolombia | Finance | Yes | http://www.grupobancolombia.com/sustainability/pdf/HumanRightsPolicy.pdf | Universal Declaration on HR, ILO conventions | Yes. In HR Policy which however is not detailed. It deals with with suppliers, contractors, partner companies and communities | Ambiguous | Reference in relation to those affected by a project to be financed by the bank | | | |

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| Ecopetrol | Oil and Natural Gas | Yes | http://www.ecopetrol.com.co/wps/portal/web_es/ecopetro-l-web/corporate-responsibility/sustainability/b-ans-of-best-practices/human-rights/ut/p/z1/04_S9CPyKssy0xPLMmMz0vMAfj0z8zvQzctH N3dDQy9DfxMTA0cPYQcAKK8TAy9Kz0w8EKDHAARwP9KFL6o8BK8JjgRcgMoCMd85KMLdL1o4pS01KLUov0SouAbs8oK5kotl1UDUoLy_XS8_PT89J1UvO1yvNVjXApikjv7hEPwJdrX58bo5BblRSZbmjoiAMNrmBQ!!/dz/d5/L2dBISvZ0FBISnQSEH/ | Guiding Principles , Global Compact, ILO conventions, Voluntary Principles on Security and Human Rights | Ecopetrol assumes the duty of employers to respect Human Rights and accordingly undertakes to Carry out all its business operations within the framework of respect for Human Rights . Reject and publicly condemn any abuse or violation of Human Rights and International Humanitarian Law (IHL). To this extent, Ecopetrol calls for full and impartial investigations of reported abuses and strongly supports the actions that are deployed, so that those responsible are brought to justice and the culture of impunity disappears. | Yes | Human Rights Committee: Verify compliance with the company's Human Rights Guide. Review and propose best practices in Human Rights. Approve and monitor the dissemination and deployment strategy for the Human Rights Guide within the company. However, there is no further explanation in regards to this. In order to comply with due diligence on Human Rights, Ecopetrol has adjusted its complaints and claims system through the clear definition of actions that constitute Human Rights abuses within the system's existing matrices. Additionally, the target has been set for 2012 to have a Human Rights risk map that will include, amongst other aspects, a special chapter analyzing vulnerabilities in relation to the risks of child labor and forced labor within the supply chain. in terms of web-sapce that is designated to information about human rights, ecco petrol is noteworthy. Various aspects are categories into different sections. However, the information is lacking in examples. | | | |
| CIFI | Finance | No | http://www.cifi.com.hk/en/in dex.php | | | | | | | |
| EKF | Finance | Yes | http://www.ekf.dk/Docs/CSR%20rapport%202014.pdf | Guiding Principles , Global Compact | Apart from using international standards, we have chosen to focus on our direct sphere of influence: Incorporating human rights due diligence in all our regional country risk assessments | Yes | They mention "The work includes human rights training in the CSR department including understanding the human rights impacts on our transactions as well as a formulation of our human rights due diligence processes " but do not explain how this will be achieved. There are no specific human rights due diligence method apart from mentioning it. | | | |
| Carlsberg | Food and Beverage | Yes | http://www.carlsberggroup.com/csr/ReportingonProgress/LHR/Pages/LabourHumanRights2013.aspx | Universal Declaration on HR, ILO conventions | "Carlsberg sets high standards for creating fair, respectable and safe conditions for all our employees and for those who indirectly work with us. Our global Labour & Human Rights Policy is enforced and compliance measured to safeguard those standards. As we are operating in the global marketplace, we focus in particular on those markets where local labour practices and conditions do not meet the standards we have set for ourselves across the Group. We do this through targeted actions related to the context of these specific markets" | Yes | "We asked the Danish Institute for Human Rights (DIHR) to identify the key human rights-related impacts of our operations across the value chain in Myanmar. The report will be made publicly available in 2015. Based on DIHR's findings, we will design action plans to prevent potential adverse impacts. The findings are currently being completed and will be made available as part of the opening of the brewery." | | | |
| Maerskoiil | Oil and Natural Gas | Yes | http://www.maerskoiil.com/operations/Qatar/Documents/maersk-oil-qatar-sustainability-report-2013.pdf | Global Compact | "We respect human rights and work to ensure that we do not contribute to human rights violations. Our approach is to integrate human rights management into existing business processes. In practice, this means that many of the issues relevant to protecting human rights are covered by programmes in health and safety, labour practices and human resource management, and responsible supply chain management and | Ambiguous | The term HRDD is used only once in the CSR and there is no information of any HRDD processes | | | |
| Arab African International Bank | Finance | Yes | http://www.aalib.com/textpage?id=313 | Global Compact | "Since adopting the UN GC in the year 2005, Aalib is officially committed to preserve human and labor rights with subsidiaries, suppliers and outsourced support staff. The bank's commitment extends through the Equator Principles to incorporate prevent child labor thought conducting assessment to project lending operation of 10 Million U.S \$ or more and bridge loans of 2 Million U.S\$." | No | There is reference to the Guiding principles without indicating whether the bank accepts them as part of its HR and CSR instruments | | | |
| Christian Dior | Apparel | No | | | | | | | | |
| Hermes International | Apparel | Yes | http://usa.hermes.com/customer-service/california-transparency-supply-chains-act/usa | Global Compact, Universal Declaration on HR, ILO conventions | The Hermès Group audits suppliers that, based upon an analysis of the volume of the supplier's business and the risk of abuses in the country in which the supplier is located, pose a high risk of working condition violations. The Hermès Group announces the audit and then delegates the audit to a third party, in charge of ensuring that its suppliers are compliant with Social Accountability International's SA8000 standards, an international standardized code of conduct for improving working conditions around the world, and are compliant with the Code | No | Mostly dealing in transparency in the supply chain and training to employees | | | |
| Credit Agricole | Finance | Yes | http://www.credit-agricole.com/en/content/download/6062/45417/version/1/file/Charte%28A4%29eng+vddef.pdf | Universal Declaration on HR, Global Compact, ILO conventions, Independent HR Policy Based on Own Business Code | "Convinced that respect for human rights is not the exclusive domain of government, Crédit Agricole S.A., as a socially responsible company, undertakes to promote such respect in its business activities and spheres of influence. In order to further develop Corporate Social Responsibility efforts already initiated in France and abroad, Crédit Agricole S.A. is committed to promoting and implementing the principles of this Human Rights Charter within the Group and to making continuous progress in this regard in | Yes | None | | | |

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| Dexia | Finance | Yes | http://www.active-documents.fr/dexia/dd4/en/age-14.pdf | Global Compact, Universal Declaration on HR, ILO conventions | domain of government, Crédit Agricole S.A., as a socially | No | None | | | |
| Natixis | Finance | No | https://www.natixis.com/natixis/jcms/ala_5408/en/abor-relations | | No | No | | | | |
| PNB Paribas | Finance | Yes | http://www.bnpparibas.com/sites/default/files/ckeditor_upload/files/PDF/Nous%20Connaître/Banque%20Responsable/UK%20d%C3%A9claration%20BNP%20sur%20droit%20de%20l'homme.PDF | Universal Declaration on HR, ILO conventions | It states that "It has a responsibility within its spheres of influence to uphold [the HR] Principles ... in its interactions with its core stakeholders." | No | Lists steps of upholding HR principles involving: Employees; Suppliers and sub-contractors; Clients and Communities | | | |
| Societe Generale | Finance | No | https://www.societegenerale.com/sites/default/files/documents/Document%20RSE/Rapport_RSE_2014/en/index.html | Universal Declaration on HR, ILO conventions | The CSR Report gives an impression of incorporation and assurance of HR | No | | | | |
| Danone | Food and Beverage | Yes | http://www.danone.com/en/publications/2tx_bidanonepublications_pi2j[download]=8747&cHash=147b7e4690e0ed8d3a3a4e8909d691 | Global Compact, ILO conventions, Universal Declaration on HR | "Danone's commitment to comply with and promote human rights principles has been defined, deployed and promoted to employees and suppliers through a variety of means and in several phases: <ul style="list-style-type: none"> • Danone joined the United Nations Global Compact in 2003, and reaffirmed its commitment in 2009; • in 2005, the Seven Fundamental Principles defined by the International Labor Organization conventions were addressed in an agreement between Danone and the IUF, and were the subject of joint visits; • Danone implements them via the Danone Way approach, which applies to 93% of the company sales and includes 16 key practices relating to Social and Environmental Responsibility, including a specific Human Rights dimension; • the Seven Fundamental Principles are the basis for the RESPECT program launched in 2005, which aims among other things at ensuring the application of these principles by the Danone's suppliers." | No | Employees' awareness of human rights practices is raised through two approaches: <ul style="list-style-type: none"> • the Danone Way approach (see page 18 of this report): every Danone employee has received a Danone Inside Pack that describes the Danone Way approach and its 16 key practices. These materials provide information on human rights, particularly with regard to the ban on child labor and forced labor, diversity and equal opportunity, and safety at work. Among the approach's 16 key practices, eight relate specifically to "Human Rights" and "Human Relations"; • the RESPECT program (see page 58 of this report): the Procurement departments manage supplier compliance with regard to social responsibility, and in particular respect for human rights. A communication guide about the RESPECT program including the Fundamental Social Principles was broadly distributed to the procurement function in 2010. Therefore, 100% of purchasers have been informed. | | | |
| Pernod Ricard | Food and Beverage | Yes | http://www.pernod-ricard-nordic.com/Corporate-Responsibility/CR-in-the-Supply-Chain/PRN-as-Best-practice-in-the-PR-Global-Compact-Report/ | Global Compact, Universal Declaration on HR, ILO conventions | Simply restate the UN Global Compact Principles that: "1. Businesses should support and respect the protection of internationally proclaimed human rights; and 2. Make sure that they are not complicit in human rights abuses." | No | None | | | |
| Areva | Mining | Yes | http://www.areva.com/media/theque/liblocal/docs/groupe/Charte-Valeurs/2013/CHARTE_VALEURS_ANGAIS.pdf | Universal Declaration on HR, Global Compact, ILO conventions | Simply restates the UN Global Compact Principles | No | | | | |
| Total | Oil and Natural Gas | Yes | http://www.total.com/en/society-environment/ethics-and-values/areas-focus/respecting-human-rights-our-sphere-operations?%FFbw=kludge1%FFinternal-guide?xtmc=human%20rights&xtnp=1&xtcr=6 | Guiding Principles , Global Compact | Group and to making continuous progress in this regard in | Ambiguous | Their Human Rights Compliance Assessment is questionnaire tool comprised of 30 to 100 questions and is adaptable depending on the country risk, the subsidiary's business and the sensitive situations which it may face. They receive advice from CDA Collaborative Learning Projects (CDA) is a non-profit organization working in the field of economical and social development. Their initiative to include an independent third party to overlook certain human rights aspects of their activities is noteworthy. However, their approach of issuing questionnaires to investigate whether rights have been maintained or not is a little doubtful in efficiency as other parties may well lie in order to get the contract. A follow up investigation after the questionnaire would have been more useful to make sure their replies are accurate. | | | |

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| Adidas | Apparel | Yes | http://www.adidas-group.com/media/filer_public/2013/11/14/human_rights_responsible_business_practices_qa_july_2011_en.pdf | Guiding Principles , Universal Declaration on HR, ILO conventions | "The adidas Group recognises the importance of respecting and promoting human rights globally. We also believe that the private sector can play a constructive role in advancing this goal. We recognise, however, our own limitations and ability to influence change on the world stage. We therefore focus our efforts on those areas which are within our own direct influence. We do so firstly by striving to operate responsibly and in a sustainable way along the entire value chain, and secondly by safeguarding the rights of our own employees and those of the workers who manufacture our products through direct supplier relations." | Yes | Such a due diligence process is already in place within the adidas Group with respect to the way we | | | | |
| DekaBank | Finance | Yes | https://www.dekabank.de/media/en/docs/sustainability/DekaBank_Sustainability_Report_2014.pdf | Global Compact, ILO conventions | Under "Respect for HR" they say: "In line with our business strategy, we always consider the geopolitical context when taking investment decisions. To this end we keep a blacklist of countries where human rights abuses or corruption are commonplace. The list has been in use since mid-2012 and is regularly updated. Opportunities that might arise in such countries are rejected on principle. Such rejections are based on the rules of our sustainability strategy, internal compliance guidelines and risk | No | There seems to be an effort to streamline HR across all their operations but the processes are not clear | | | | |
| KfW-Ipex Bank | Finance | Yes | https://www.kfw.de/nachhaltigkeit/KfW-Group/Sustainability/Sustainability-Management/Guidelines/Declaration-of-human-rights-of-KfW-Bankengruppe/ | Universal Declaration on HR | KfW will not be party to any human rights violations in any form whatsoever within its own sphere of influence. It is also committed to using the tools at its disposal to actively support the implementation of international human rights | Yes | Most of its HR processes relate to projects they finance. They mention HRDD but without specifics | | | | |
| Portigon | Finance | Yes | http://www.portigon.com/cm/content/portigon/en/portigon-ag/unsere-verantwortung/nachhaltigkeit/_jcr_content/contentparsys/box_12/download_4/file.res/140109_Policy_for_Environmental_and_Social_Issues.pdf | Universal Declaration on HR, ILO conventions | In its Sustainability Policy, it has a paragraph under HR which reads: "The company is committed to comply with human rights pursuant to the Universal Declaration of Human Rights in its business activity. This equally applies to the eight core labour standards of the International Labour Organization (ILO). The Bank will not support business transactions which contravene the Universal Declaration of Human Rights or the ILO core labour standards." | No | | | | | |
| SAP | Technology | Yes | http://www.sapintegratedreport.com/2013/en/ng/governance/human-rights.html?sword_list%5B0%5D=human&sword_list%5B1%5D=rights | Guiding Principles , Global Compact, Universal Declaration on HR | Respecting human rights is both a moral and a business imperative. Upholding high standards protects our reputation, supports diversity, helps to attract and keep top talent, and fosters our innovation as our employees work in fair, ethical conditions. | No | have internal processes in place to protect employee rights and entitlements, through the policies | | | | |
| Coal India | Mining | No | https://www.coalindia.in/ | | | | | | | | |
| Hindalco Industries | Mining | Yes | http://www.hindalco.com/gprts/b/documents/investors/downloads/hindalco_sustainability_report2013.pdf | Global Compact | We do not have formal Human Rights reviews and/or impact assessment done is being planned . Planned to include details in the HSR 14- 15 report. | | | | | | |
| Reliance Industries | Oil and Natural Gas | Yes | http://www.rii.com/DownloadFiles/SustainabilityReports/rii_sr2013_14.pdf | Global Compact | "Our commitment to respecting human rights forms the foundation of our approach towards community engagement practices and development. We believe that we must behave in a manner that respects the human rights of employees, communities and business partners. We believe that our foundation rests on respecting the social and economic dignity and freedom, regardless of nationality, gender, race, economic status or religion. To ensure that our practices are fair to our foundation, we have covered issues related to bribery and corruption, fraud, insider trading, human rights and discrimination & their corrective measures in to our code of conduct and ethics policies. We conduct our businesses in an ethical manner with due regard to the interests of our stakeholders & the environment. We ensure the freedom of association, prohibition of child labour, protection of indigenous rights and prohibition of forced & compulsory labour." | No | | | | | |
| ONGC (Oil and Natural Gas) | Oil and Natural Gas | No | http://ongcindia.ongc.co.in/wps/wcm/connect/ongcindia/home/ | | and contracts that include human rights clauses | | Audit function. They were perhaps too quick to judge that their current risk assessment is the same level as the one required by the ruggie principle. | | | | |
| Accenture | Technology | Ambiguous | http://careers.accenture.com/us-en/work-we-do/about-accenture/news/Pages/accenture-best-places-work-lgbt-equality.aspx | | Ensuring an inclusive environment for our lesbian, gay, bisexual and transgender (LGBT) employees across the globe is an integral part of how we do things at Accenture. For the seventh year in a row, Accenture received 100 out of 100 on Human Rights Campaign's (HRC) Corporate Equality Index (CEI). Our 100 percent rating once again earns us the distinction of "Best Places to Work for LGBT Equality." | No | | | | | |
| Prada | Apparel | No | http://www.prada.com/ | | | | | | | | |

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| Intesa Sanpaolo | Finance | Yes | http://www.group.intesasnpaolo.com/script/sir0/si09/sostenibilita/eng_diritti_umani.jsp#/sostenibilita/eng_diritti_umani.jsp | Guiding Principles , Universal Declaration on HR, ILO conventions, Independent HR Policy Based on Own Business Code | Intesa Sanpaolo supports Human Rights internationally through targeted initiatives especially in countries in need and interventions to support the communities in the areas in which it operates through its own foreign subsidiaries. | No | Intesa Sanpaolo has adopted its own Code of Ethics with the specific objective of consciously handling certain reputation risks linked to the relationship with its Stakeholders and which would have otherwise remained latent. Thus, the Code has laid down a set of voluntary commitments towards all stakeholders, which has resulted in the signature of international standards, issue of policies for the most sensitive areas and annual setting of improvement objectives within the scope of the management process of the Sustainability Report | | | |
| UniCredit | Finance | Yes | https://www.unicreditgroup.eu/content/dam/unicreditgroup/documents/en/sustainability/our-vision-of-a-sustainable-bank/governance-and-sustainability/Human_Rights_Commitment.pdf | Guiding Principles , Global Compact, Universal Declaration on HR, ILO conventions, International Convention on Civil/Political Rights | UniCredit aims to: Avoid causing or contributing to adverse human rights impacts through its own activities, and address such impacts when they occur, and Seek to prevent/mitigate adverse human rights impacts that are directly linked to its operations/products/services by their business relationships, even if they have not contributed to those impacts. Where UniCredit identifies that it has: "caused or contributed to adverse impacts, it provides for/cooperates in their remediation through legitimate processes. | No | Has set up a human rights committee. However, There is no explanation of what their human rights assessment include. Very general promises on equal rights, respect and freedom. | | | |
| Eni | Oil and Natural Gas | Yes | http://www.eni.com/en/IT/sustainability/business-ethics/map-human-rights.shtml | Guiding Principles , Global Compact, Universal Declaration on HR | An active and attentive approach is also adopted in order to prevent the risk of complicity in violations committed by third parties in combination with the intention to promote human rights as a fundamental theme for sustainable development while strengthening the involvement of public institutions and the business community in this area. In 2008 a variety of initiatives and specific risk analyses were implemented with the common objective of ensuring that all operational realms of Eni – ranging from daily operations to long-term strategies – are in compliance with the principles contained within the guidelines on human rights that were adopted in 2007. No further explanation. | Yes | There is a rudimentary framework but without details | | | |
| Fast Retailing | Apparel | Yes | http://www.fastretailing.com/eng/csr/business/supplier.html | Independent HR Policy Based on Own Business Code | the company has actually dedicated efforts into publicizing their methods. , we conduct a continuous risk assessment of our supply chain for understanding human rights issues, including human trafficking and slavery. We regularly review relevant reports, and interact with government authorities and private specialists to keep our knowledge and information up to date. We engage external auditing firms to perform announced, semi-announced, and unannounced monitoring to evaluate compliance with our Code of Conduct. Factories are required to address and correct any nonconformance issues identified during monitoring or follow-up monitoring | No | | | | |
| Bank Of Tokyo-Mitsubishi UFJ | Finance | Ambiguous | http://www.bk.mufg.jp/global/aboutus/ethical.html | | "We respect the diversity and human rights of all MUFG employees. We do not engage in or tolerate discrimination, harassment, intimidation, or any other behavior or activity that is inconsistent with these core beliefs. We report any violations of laws and rules, and we manage corporate assets appropriately." | No | | | | |
| Mizuho Financial Group | Finance | Yes | http://www.mizuho-fg.co.jp/english/csr/governance/human/index.html | Global Compact | "We respect the diversity and human rights of all MUFG employees. We do not engage in or tolerate discrimination, harassment, intimidation, or any other behavior or activity that is inconsistent with these core beliefs. We report any violations of laws and rules, and we manage corporate assets appropriately."Mizuho places the utmost emphasis on promoting initiatives that help raise awareness toward human rights at each group company as a part of efforts to nurture a corporate culture that reflects a deep respect for human rights. In addition to positioning human rights as a key element of its Code of Conduct, Mizuho is a signatory to the UN Global Compact's voluntary principles on human rights, labor, the environment, anti-corruption and others. With a high regard for our corporate culture that respects diversity and the differences of each employee, we will continue efforts to create a better worksite where every employee is encouraged to work with high morale and a positive mind-set." | Yes | Have a list of initiatives falling under HRDD: http://www.mizuho-fg.co.jp/english/csr/governance/human/diligence/index.html . Also have a HR Awareness Training and Promotion Organizational Structure: http://www.mizuho-fg.co.jp/english/csr/governance/human/structure/index.html | | | |
| Sumitomo Mitsui Banking | Finance | No | | | | | | | | |
| Japan Tobacco | Food and Beverage | Yes | http://jti.com/files/4413/7173/6320/2013_CSR_report_web_version.pdf | Independent HR Policy Based on Own Business Code | Human Rights ISO 26000 takes a comprehensive view to Human Rights, with organizations expected to respect an individual's civil, economic, political, social and cultural rights, with a particular focus with regard to vulnerable groups. Only mentions general comments like this and no mention of any methods | | | | | |
| Kirin Holdings | Food and Beverage | No | | | | | | | | |
| Mitsubishi Materials | Mining | Yes | http://www.mmc.co.jp/corporate/en/csr/pdf/CSR2013_AIIP_pages.pdf | Independent HR Policy Based on Own Business Code | Article 3 of their Code of Conduct says : "We will respect the basic human rights of all people and create a spirited, safe and comfortable work environment." | No | They seem to dwell much on human rights issues in the supply chain | | | |

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| JX Nippon Mining & Metals | Mining | Yes | http://www.nmm.jx-group.co.jp/english/sustainability/voice/voice01.html | Independent HR Policy Based on Own Business Code, Global Compact | "Since fiscal 2008, the Company has participated in the United Nations Global Compact, an international initiative that advocates 10 universal principles, including human rights and labor. Furthermore, the JX Metals Group Compliance Regulation specifies to strictly prohibit unjust discrimination and sexual harassment in order to ensure the Group's attitude of respecting human rights." | No | | | | | |
| Sumitomo Metal Mining | Mining | Yes | http://www.smm.co.jp/E/csr/humanrights/ | Independent HR Policy Based on Own Business Code | "The SMM Group has set forth a policy on human rights aligned with the SMM Group Corporate Philosophy and the SMM Group Code of Conduct. In determining the policy, opinions were sought both from within the Group, as well as from outside experts. The policy prescribes compliance not only with domestic laws and ordinances relating to human rights, but also with various international standards" | Yes | Their 2014 CSR Report covers HRDD aspects they have undertaken and the framework of assessment | | | | |
| Panasonic | Technology | Yes | http://panasonic.net/sustainability/en/human_rights/policy/ | Universal Declaration on HR, ILO conventions | We demand that our suppliers adhere to the following in our Standard Purchase Agreement with them. Completely respect the human rights of their employees. Provide employees with a safe and comfortable workplace environment. Strive to provide equal employment opportunities without discrimination. Do not engage in forced labor, child labor, illegal employment of foreign labor, or any other illegal employment activities. Follow the laws and regulations of countries and regions in which business activity takes place regarding employment conditions, including wages and work hours. Require that their subcontractors and suppliers follow the same rules. In the event a violation is discovered, it must be immediately reported and remedial action must be swiftly taken. | No | Says: "Meanwhile, Panasonic consults with the Guiding Principles on Business and Human Rights endorsed by the United Nations Human Rights Council in June 2011. As a member of the Japan Business Council in Europe (JBCE), Panasonic also submits public comments regarding the ICT Sector Guidance being drafted by the European Commission. Based on these initiatives, the Company is adopting the proactive approach of accurately reflecting global trends and conditions into its management and operating activities." | | | | |
| Fujitsu | Technology | Yes | http://www.fujitsu.com/global/about/profile/philosophy/codeofconduct/ | Independent HR Policy Based on Own Business Code, Universal Declaration on HR, ILO conventions | Simply states : We respect each individual's human rights and will not discriminate on the basis of race, color, religion, creed, sex, age, social status, family origin, physical or mental disability or sexual orientation, nor will we commit other violations of human rights. Such discrimination will not be tolerated. We will be resolute in upholding human rights in everything we do and will not tolerate such discrimination in others. Ignorance and inaction do not constitute excuses for discrimination. We will make every endeavor to be fully aware of human rights issues and foster respect and equality for all | Yes | "Recognizing the United Nations Guiding Principles of Business and Human Rights, we are striving to conduct human rights due diligence. Considering the impacts human rights violation can cause, we will prioritize appropriate actions to identify, prevent or mitigate those impacts in our value chains. We will regularly review and update the progress on our efforts, and annually communicate the results through our CSR report and other communication tools. Where we identify that we have caused or directly contributed to adverse human rights impacts, we would engage in appropriate remediation processes by ourselves or in cooperation with other stakeholders." | | | | |
| Fujifilm | Technology | Yes | http://www.fujifilmholdings.com/en/about/philosophy/law/humanrights.html | Independent HR Policy Based on Own Business Code | "We respect and protect basic human rights guaranteed by international declarations as well as national constitutions and judicial precedents, and we do not infringe on such rights." | No | | | | | |
| Sony | Technology | Yes | http://www.sony.net/Sonyinfo/csr_report/employees/diversity/index2.html | Independent HR Policy Based on Own Business Code, Universal Declaration on HR | "Sony is committed to creating a workplace where human rights are respected and equal employment opportunities allow all individuals to make the most of their capabilities. In light of the increasing diversity of human rights issues facing corporations, Sony believes a common awareness among employees is crucial to ensuring such issues are addressed appropriately." | No | | | | | |
| Nintendo | Technology | Yes | http://www.nintendo.com/corporate/csr/ | Independent HR Policy Based on Own Business Code | Because Nintendo outsources the manufacture and assembly of all Nintendo products to production partners, in 2008 their provided to all of their production partners the Nintendo Corporate Social Responsibility (CSR) Procurement Guidelines. They implemented these guidelines based on relevant laws, international standards and guidelines that focus on protecting human rights, ensuring workplace safety, promoting corporate ethics and safeguarding the environment. In 2011 their refined their CSR Procurement Guidelines in order to provide their partners with more specific directives that address socially responsible procurement practices, such as the non-use of conflict minerals and the importance of investigating the source of raw materials. | No | | | | | |
| Kuwait Petroleum Corporation | Oil and Natural Gas | No | https://www.kpc.com.kw/about-kpc | | | | | | | | |
| National Oil Corporation-Libya | Oil and Natural Gas | No | http://noc.ly/index.php/en/ | | | | | | | | |
| Madagascar Oil | Oil and Natural Gas | No | http://www.madagascaroil.com/ | | | | | | | | |
| Petronas | Oil and Natural Gas | Yes | http://www.petronas.com.my/sustainability/Pages/corporate-sustainability-framework.aspx | Independent HR Policy Based on Own Business Code | simple comment : "Safeguarding human rights within our sphere of influence, contributing to community needs, investing in training and education, promoting arts and sports, and conducting our business in a transparent manner." The same statement is reproduced in the 2013 Sustainability Report | No | | | | | |
| Mauritius Commercial Bank | Finance | No | http://www.mcbgroup.com/en/ | | | | | | | | |

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| Banorte | Finance | Yes | http://www.banorte.com/doc/GFNORTE_Annual_Report_2013_FINAL.pdf | Global Compact, Universal Declaration on HR, ILO conventions | The 2013 Annual report mentions nothing about HR. The 2012 Report simply stated: "In the third quarter of 2012, the document —Our Commitment to the United Nations Global Compact was published, which is an international initiative that aims to integrate ten principles, in the areas of Human Rights, Labor, Environment and Anti-Corruption into organizational business strategy and operations." | | | | | |
| GBanco | Finance | No | | | | | | | | |
| Femsa | Food and Beverage | Yes | http://www.femsa.com/sites/default/files/FEMSA_SR14_En_g.pdf | Global Compact | Coca-Cola FEMSA applies the Supplier Guiding Principles provided by The Coca-Cola Company which are a series of standards and policies for responsible sourcing to which we adhere in our operations and with which we assess key suppliers and contractors under international guidelines regarding the respect to Human Rights, forced labor and child labor, amongst others. | No | | | | |
| Grupo Mexico | Mining | No | | | | | | | | |
| BMCE | Finance | No | | | | | | | | |
| Access Bank | Finance | Yes | https://www.accessbankplc.com/images/sustainability/Access_Banks_Sustainability_Report_2013.pdf | Global Compact | Simply states : "We have a human rights policy that allows our global operations to align our practices with the International Labour Organisation and the UN Commission on Human Rights. Also in line with Sections 13 and 14 of the Employee Code of Conduct the Bank creates an appropriate environment that will ensure equal opportunities in all aspects of employment and not tolerate discrimination against any kind." | No | Most of their HR policies relate to labour relations | | | |
| Aterios Capital | Finance | No | | | | | | | | |
| Fidelity Bank | Finance | Yes | https://www.fidelitybankplc.com/index.php/about-us/sustainability-banking-report#innertab4 | Universal Declaration on HR, ILO conventions | "Fidelity is guided by the International Bill of Human Rights and the conventions of the International Labour Organization in its dealings with employees, suppliers and third-party contractors. The Bank recognizes the responsibility of business to respect human rights independently of the state duties to respect, protect, and fulfill human rights. This responsibility means to avoid infringing on the human rights of others and to address adverse human rights impacts business may cause or contribute to. Meeting this responsibility also means creating access to an effective grievance mechanism that can facilitate early indication and prompt remediation of various project-related grievances. In pursuit of these objectives, Fidelity employee policies prohibit use of child labour; forced labour and discrimination on grounds of race, religion, age, gender or economic background. We are currently implementing procedures that will enable us require similar compliance from our contractors and third party suppliers" | No | | | | |
| DNB | Finance | Yes | https://www.dnb.no/portalfront/medias/en/about-us/corporate-responsibility/group_policy_corporate_social_responsibility_dnb.pdf | Guiding Principles , Global Compact | The Policy does not state details of how CSR will be implemented and makes general statements like: "Main principles: 1. DNB shall not contribute to the infringement of human or labour rights, corruption, serious environmental harm or other actions that could be regarded as unethical. 2. DNB shall seek to promote sustainable development in the areas and business sectors where the Group operates. " | No | | | | |
| Hydro | Mining | Yes | http://www.hydro.com/en/Our-future/Our-performance/UN-Global-Compact/ | Global Compact, Universal Declaration on HR, ILO conventions | As a global aluminium company with mining interests and more than 13,000 suppliers, Hydro is at risk of being exposed to corruption and human rights violations. Hydro's approach is zero tolerance, and in the event of violations, our policy is first to correct, then act in a transparent manner, learn and implement corrective actions. | Yes | "Since 2012 Hydro has cooperated with the Danish Institute of Human Rights (DIHR). In 2014, the work included further development of our human rights due diligence systems as well as CSR assessment of all of Hydro's Brazilian operations, and evaluation of the third party grievance mechanism in Brazil." However not much is | | | |
| Statoil | Oil and Natural Gas | Yes | http://www.statoil.com/en/EnvironmentSociety/Sustainability/Pages/HumanRights.aspx | Guiding Principles , Global Compact, ILO conventions, Universal Declaration on HR | Following a risk-based approach, we assess human rights aspects and potential impacts of our ongoing activities and new business opportunities in order to avoid adverse impacts on individuals and nearby communities potentially affected by our operations. Our human rights efforts cover topics such as community impact, labour standards and security. Human rights aspects are incorporated in our annual monitoring plans, as relevant based on risk. | No | They have however a HR performance framework | | | |
| BankMuscat | Finance | No | | | | | | | | |
| Banco Espirito Santo | Finance | Yes | http://www.novobanco.pt/site/cms.aspx?plg=276ffad1-4d69-4a60-bbee-aecc5e8c4bb1 | Global Compact, Universal Declaration on HR, ILO conventions | It should also be pointed out that after the formalization of the Labour and Human Rights Policy applicable to all the Group companies, in 2011, the Bank continued to implement the policy in 2012, approving a number of measures that accelerated their implementation: • Appointment of an Administrator responsible for the question of Labour and Human Rights, • Publication of the Human Rights Policy in the sites of its sub-companies in the different languages; • Training underlying Human Rights for the Employees of all the Group companies. | No | | | | |

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| Qatargas | Oil and Natural Gas | Yes | http://www.qatargas.com/English/CorporateCitizenship/Documents/SUSTAINABILITY%20REPORT%20SP%206052014.pdf | Independent HR Policy Based on Own Business Code | Qatargas has addressed human rights issues as part of its Code of Business Ethics Policy. There is currently no separate Human Rights policy, goals and objectives in Qatar. In accordance with Qatari Law, Qatargas maintains compliance with all laws prohibiting child and forced labour; and undertakes to suppress the use of child, forced or compulsory labour in all its forms. | No | | | | | |
| RasGas | Oil and Natural Gas | No | | | | | | | | | |
| Norilsk Nickel | Mining | Yes | http://csr2013.norilsk.ru/en/social_policy/basic_principles/index.php?sphrase_id=361 | ILO conventions | MMC Norilsk Nickel declares the adherence to observance of human rights according to the Constitution of the Russian Federation and the Russian legislation, the conventional principles and the norms of international law stated in declarations, conventions and recommendations of the International job management and other international organizations. OJSC MMC Norilsk Nickel has joined the Social charter of the Russian business in 2005. | No | Refers to declarations, conventions and recommendations of the ILO: not clear which particular ones or if any | | | | |
| GazProm | Oil and Natural Gas | No | | | | | | | | | |
| Rosneft | Oil and Natural Gas | No | | | | | | | | | |
| Lukoil | Oil and Natural Gas | No | | | | | | | | | |
| Saudi Aramco | Oil and Natural Gas | No | | | | | | | | | |
| Wilmar International | Food and Beverage | No | | | | | | | | | |
| Absa Bank | Finance | Ambiguous | http://absa.investoreports.com/absa_ar_2010/governance-remuneration-risk-and-controls/remuneration-and-human-resources/human-resources-report/ | | Have a Manual which merely refers to the South African HR Commission. Information on their website about HR relates to labour relations only | | | | | | |
| FirstRand | Finance | No | | | | | | | | | |
| Nedbank | Finance | Yes | http://www.nedbankgroup.co.za/sustainabilityGovernanceUN.asp | Global Compact | "Respecting human rights in all its business activities is fundamental to the way Nedbank Group operates. This is done through compliance with South Africa's comprehensive bill of rights as contained in the Constitution and within labour legislation. Necessary consideration is given to the impact of human rights in the group's corporate responsibility policy and the bank also participates in the United Nations Environment Programme: Finance Initiatives (UNEP FI) working group, which specifically promotes the importance of human rights within the financial sector." | No | They refer to the Human Rights and Business Project South Africa as providing a business approach to HR. | | | | |
| Standard Bank of South Africa | Finance | | | | | | | | | | |
| AngloGoldAshanti | Mining | Yes | http://www.anglogoldashanti.com/en/About-Us/corporategovernance/Corporate%20Governance%20Documents/HumanRightsPolicy.pdf | Guiding Principles | AngloGold Ashanti has chosen implementation of the UN Guiding Principles on Business and Human Rights as its definitive approach to meeting its obligations to respect human rights throughout its own activities and in its business relationships. | No | Merely states: "To implement and uphold this policy statement, we will be guided by the UN Guiding Principles on Business and Human Rights. This policy statement will be publicly available, communicated effectively to all relevant parties and | | | | |
| African Rainbow Minerals | Mining | Yes | http://www.arm.co.za/sd/sd_our_approach.php | Global Compact | "Respect for human rights is an essential part of AngloGold Ashanti's vision and values. It is fundamental to our value of treating each other with dignity and respect. We support the vision of a world where everyone can enjoy their universal human rights, and where business plays its part by respecting all human rights. States are responsible for the protection, promotion and fulfilment of human rights and companies have a responsibility to respect human rights. We are committed to doing no harm, to avoiding infringing the human rights of others, and to addressing adverse human rights impacts where they may be linked to our activities. We will strive to avoid causing and contributing to adverse impacts through our own activities, and address them if they do occur through appropriate remediation. We will seek to prevent and mitigate adverse impacts linked to our operations, our products or services provided by | | | | | | |
| Goldfields | Mining | Yes | https://www.goldfields.co.za/pdf/standards_policies/human_statement.pdf | Guiding Principles , Global Compact, Independent HR Policy Based on Own Business Code | | Ambiguous | There is mention of HRDD in their Annual report of 2014 without any details | | | | |

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| Samsung | Technology | Yes | http://www.samsung.com/us/aboutsamsung/sustainability/alertmanagement/download/Labor_and_Human_rights.pdf | ILO conventions | "In 2012, in order to ensure the responsible management of our supply chain, Samsung Electronics intensified the systematic scrutiny of our suppliers in terms of labor conditions, human rights, and health and safety. In doing so, we identified key issues with which to measure our suppliers' compliance - some of which we took immediate measures to address." - 2013 Sustainability report: http://www.samsung.com/us/aboutsamsung/sustainability/sustainability | No | Have a "Human Resource Disclosure on management Approach" which mirrors a HRDD approach of some sort | | | |
| Inditex | Apparel | Yes | https://www.inditex.com/documentos/10279/18789/inditex_Group_Annual_Report_2013.pdf/88b623b8-b6b0-4d38-b45e-45822932f72 | Guiding Principles , Guiding Principles , Guiding Principles , Global Compact, ILO conventions | One of the fundamental principles of the UN Framework for Business and Human Rights obliges companies to act with due diligence to avoid infringing on the rights of others. In 2011, this Framework, known as the Ruggie Framework, was developed based on the "Guiding Principles on Business and Human Rights: implementation of the U.N. framework to protect, respect and remedy". | Yes | Inditex is committed to respecting and applying these principles by implementing policies directed at maintaining the sustainability of its supply chain using a two-pronged approach: avoid causing adverse impacts in the community where it operates and seek to prevent or mitigate consequences directly linked to its operations, even if it has not contributed to those impacts. However, there is no mention of any methods. | | | |
| Banco Sabadell | Finance | | | | | | | | | |
| BBVA | Finance | Yes | http://bancaresponsable.com/wp-content/uploads/Pca_DDHH_doc_english_tcm61-190699.pdf | Global Compact, Universal Declaration on HR, ILO conventions | Respect for personal dignity and the rights inherent to it constitute, above all, an essential business requirement that the BBVA Group associates with its pledge to favour and uphold the well-being of the different social environments in which it pursues its operations. Accordingly, BBVA's Code of Conduct expressly states its commitment to apply the content of the Universal Declaration of Human Rights, the United Nations Global Compact and other agreements and treaties of international organizations, such as the Organization for Economic Co-operation and Development and the International Labour Organization. | No | | | | |
| CaixaBank | Finance | Yes | http://www.caixabank.com/empleados/caixabank/Estaticos/PDFs/Info_corporativa/CA_BK_Codigo_Etico_EN.pdf | Global Compact, Universal Declaration on HR, ILO conventions | CaixaBank understands that companies today, in addition to pursuing financial gain, must mainstream respect for human rights and environmental sustainability in their corporate objectives. There is no methods described, mainly proclamation of giving respect as above. | | | | | |
| Santander | Finance | Yes | http://www.santander.com/csgs/StaticBS?sbinary=true&blobtable=MungoBlobs&blobkey=id&SSURiscontext=Satellite+Server&blobcol=urldata&SSURicontainer=Default&SSURisession=false&blobwhere=1278680758039&blobheader=application%2Fpdf&SSURIsapptype=BlobServer#sate | Global Compact, ILO conventions, Universal Declaration on HR | Santander undertakes to ensure that its physical, banking and IT safety measures and procedures are carried out in a manner that guarantees respect for the human rights and fundamental freedoms of the people with which it interacts. In this respect, employees that carry out these duties must prove their aptitude for the job and will receive the appropriate training. In due diligence procedures prior to entering into cooperation or any other kinds of agreements within the scope of the Equator Principles, Santander undertakes to evaluate, as part of its analysis process, the human rights policies and practices of its counterparties. | No | | | | |
| Repsol | Oil and Natural Gas | Yes | http://www.repsol.com/es_en/corporacion/responsabilidad-corporativa/como-lo-hacemos/modelo-rc/compromisos-adquiridos/politica-respeto-derechos-humanos.aspx | Guiding Principles , Global Compact, ILO conventions | In addition to complying with all current applicable legislation in the territories where we operate, Repsol undertakes to respect internationally recognised human rights, including those set forth in the International Bill of Human Rights and the principles related to the rights established in the Declaration of the International Labour Organisation, regarding Fundamental Principles and Rights at Work, and the eight Fundamental Conventions that develop them. | Yes | In order to identify, prevent, mitigate and respond to potential negative consequences for human rights, and given that risks to human rights can change over time, Repsol will conduct a continuous due diligence process in its activities and those directly related to its operations, products or services due to its business relationships | | | |
| H&M | Apparel | Yes | http://sustainability.hm.com/en/sustainability/downloads-resources/policies/policies/human-rights-policy.html | Guiding Principles | Respecting human rights is a fundamental part of H&M's responsibility as a company and is vital to operate our business sustainably. H&M is committed to respecting fundamental human rights in our operations, our value chain, and in the communities where we operate. We seek to avoid complicity in human rights abuses and to use our influence to promote the fulfilment of human rights. | Yes | In order to integrate human rights considerations into the management of our business, human rights due diligence is part of our risk assessment for new production and sales markets. For existing production and sales markets, H&M will regularly evaluate human rights related risks and conduct human rights impact assessments on high-risk markets. However, there is no mention of what their impact assessment involves. | | | |
| Nordea | Finance | Yes | http://www.nordea.com/About/Nordea/Corporate+Social+Responsibility/FAQ/What+are+Nordeas+human+rights+commitments/1518402.html | Global Compact, Universal Declaration on HR | We have implemented the UN Global Compact in our business practices and operations through a variety of undertakings. On a strategic level, we have specified our commitment to the UN Global Compact in our Corporate Citizenship Principles, which are our most central Corporate Social Responsibility (CSR) principles. We have also developed more detailed subordinate policies and routines to ensure our compliance with the Global Compact in our everyday business and activities. | No | | | | |

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| SEB | Finance | Yes | http://sebgroupp.com/sitesassets/about_seb1/sustainability/sustainability_governance/policies/human_rights_policy.pdf | Guiding Principles , Global Compact, Universal Declaration on HR, ILO conventions | SEB's approach to human rights issues particularly influences how it manages employees, suppliers and relationships with clients and portfolio companies and is an intrinsic part of SEB's commitment to doing business well. | Yes | Human rights due diligence is carried out to identify, assess, prevent and mitigate actual or potential adverse human rights impacts. This is primarily accomplished by assessing areas where the risk of adverse human rights impacts is most significant. However, no further explanation as to any procedure is given. | | | |
| Credit Suisse | Finance | Yes | https://www.credit-suisse.com/responsibility/en/banking/human_rights.jsp | Global Compact, Guiding Principles | Credit Suisse examines sensitive aspects of the transactions in a clearly defined, comprehensive Reputational Risk Review Process and rejects transactions that do not meet our standards. | No | The Reputational Risk Review Process will seem comprehensive at first as is categorised into risk classifications and responsibility, assessment and recommendations and review and decisions. It's laid out using interactive diagrams, highlighting their process. However, the facts that the review process points out environmental concerns and social concerns as a broad and general category suggests that this is not a comprehensive human right due diligence process. There is no mention of any methods as to how human rights issues are tackled. The review process mainly emphasise how they ensure they don't have any association with potential clients that may damage their reputation. | | | |
| UBS | Finance | Yes | https://www.ubs.com/global/en/about_ubs/corporate_responsibility/how-we-do-business/policies_guidelines/environmental.html | Global Compact | We recognize that financial institutions are increasingly expected to play an active role in addressing pressing issues facing our world today, including respect for human rights and the protection of our environment. Climate change, for instance, will have wide-ranging effects on ecosystems, on societies and on economies worldwide, and as a bank we are determined to support our clients in preparing for success in an increasingly carbon-constrained world. The increasing awareness of environmental and human rights issues has resulted in a fast-changing regulatory and competitive landscape which is affecting UBS, our suppliers and our clients. In response to these emerging risks and opportunities, appropriate strategies are being shaped. | No | | | | |
| Nestle | Food and Beverage | Yes | http://www.nestle.com/asset-library/documents/library/documents/corporate_social_responsibility/nestle-hria-white-paper.pdf | Guiding Principles , Global Compact, Universal Declaration on HR, ILO conventions | As a company founded on clear principles we strive to comply with the laws and regulations in place wherever we operate, as well as adhering to international standards. We also recognise our responsibility to respect human rights | Yes | Nestlé's white paper on human rights, produced in November 2013 represents the first time a company has publicly commented upon the assessment of its impact on human rights in its operations and supply chain. It has, in places, given an appraisal of the difficulties they have had in adhering to human rights norms, and how they plan to address these actual and potential risks of violations. The paper is mostly a commentary on the methodology of their human rights impact assessment, rather than a discussion of the impacts themselves. | | | |
| Xstrata (now part of Glencore) | Mining | Yes | | | | | | | | |
| Glencore International | Mining | Yes | http://www.glencore.com/who-we-are/corporate-governance/policies/human-rights-policy/ | Guiding Principles , Universal Declaration on HR, ILO conventions | Respect for human rights is core to our approach to business. We are committed to the United Nations' Universal Declaration of Human Rights. We support the UN Guiding Principles on Business and Human Rights as a framework for the responsibilities of governments and corporations to protect the rights of individuals and groups and ensure that redress is available if any of these rights are infringed. Our Group Human Rights Policy is based on this framework. | No | | | | |
| Addax | Oil and Natural Gas | Yes | https://www.addaxpetroleum.com/corporate-social-responsibility/living-our-values | Global Compact, Universal Declaration on HR, ILO conventions | No specifics on HR processes. Only mentions adherence to UN Global Compact, UDHR and ILO Conventions | No | | | | |
| Taiwan Semiconductor | Technology | Yes | http://www.tsmc.com/english/csr/human_right.htm | Global Compact, ILO conventions, Universal Declaration on HR | TSMC believes that all employees should be treated with dignity and respect. TSMC is committed to upholding workers' rights and respects internationally proclaimed human rights, as outlined by the United Nations Universal Declaration on Human Rights and the International Labor Organization's fundamental conventions on core labor standards. | No | | | | |

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| PTT | Oil and Natural Gas | Yes | | Global Compact | PTT is promoting and supporting basic human rights on a practical level. PTT supports the government's policy such as compliance with the National Human Rights Plan No. 2 (2009-2013) which consists of 4 strategies, 14 sub-strategies, and 43 tactics which was approved and announced by the Cabinet on October 20, 2009. The government requires relevant authorities to transform the policy into action plans and to organize activities to underline actions thereunder. PTT has implemented these strategies and tactics in several areas including building personnel's capacity in human rights, promoting a sound exercise of power by the authorities, woman executives, surveillance of human rights violation, promotion of news and information consumption, enhancing capacity of network organizations to promote and protect human right | | | | | |
| ABN Amro Group | Finance | Yes | http://www.abnamro.com/en/images/040_Sustainability/Links_en_documenten/Documenten/Beleid_-_Human_Rights_Statement_EN.pdf | Guiding Principles , Universal Declaration on HR, ILO conventions, Global Compact | In order to recognise, prevent and mitigate risks related to human rights, the bank will continuously promote an environment that is conducive to human rights due diligence. To this end, we will continuously work on: Promoting a rights-aware culture and appropriate grievance mechanisms; Guidance for conflicting standards and situations and for conflict areas; Roles and responsibilities involving (senior) management as well as the workforce; Developing capacity – including psychological capacity – to respond to dilemmas | Yes | In the due diligence, ABN assesses:*** The client's policies and practices in dealing with human rights relevant to its operations, including but not limited to workers rights, labour rights, land rights, children's rights, the right to an adequate standard of living, and the rights to life, liberty and security of person. *** Whether the client's policies and practices follow international standards as set by the UN, and international good practices such as membership of UN Global Compact, grievance mechanisms and principles such as Free Prior and Informed Consent. *** The client's human rights due diligence processes and the monitoring of its human rights performance. | | | |
| ASN Bank | Finance | No | | | | | | | | |
| FMO | Finance | No | | | | | | | | |
| ING | Finance | Yes | http://www.ing.com/ING-in-Society/Sustainability/Sustainability-news/Snews-1/ING-policy-on-human-rights.htm | Global Compact, Universal Declaration on HR, ILO conventions | ING is fully committed to human rights. We strive to do business with customers who adhere to high standards of good governance and take responsibility. Our attitude towards human rights rests on the principles of the Universal Declaration of Human Rights, the eight Core Conventions of the International Labour Organisation (ILO) and the Global Compact of the United Nations. ING refrains from financing any activities involving the violation of human rights. | No | | | | |
| NIBC | Finance | Yes | http://www.nibc.com/fileadmin/user_upload/Documenten/Corporate_Social_Sustainability/2013_Human_Rights_Supplement.pdf | Guiding Principles , Global Compact, Universal Declaration on HR, ILO conventions, International Convention on Civil/Political Rights | NIBC's Sustainability Policy framework, including this Supplement, is in place to manage our indirect impact on human rights through client relationships. Our approach to human rights is in line with our commitment to take into account environmental & social criteria in every aspect of our business | Yes | As part of our human due diligence process, we assess the commitment, capacity and track-record of our clients in the field of environmental and social standards, including human rights and labour standards. This includes an assessment of the performance of our clients as well as their approach to manage sustainability risks in their supply chain. Their due diligence process outlines their approach but it does not really explain their process. How exactly do they conduct their assessment of the performance of their supply chain? | | | |
| Rabobank Group | Finance | Yes | https://www.rabobank.com/en/images/Human%20Rights%20Policy.pdf | Guiding Principles , Global Compact | This policy serves as a framework in relation to all commercial banking services, including credit facilities, project finance, advisory services, trade finance, leasing and asset management activities, that are provided by the Rabobank Group or one of its divisions | Yes | The human rights due diligence process different from other due diligence activities in that it focuses on adverse impacts on individuals and communities and on their rights, rather than only on risks to the company. The fact that human rights risks may change over time means this is an ongoing process instead of a one-off transactional analysis. There is an express recognition of human rights due diligence being separate to the more general due diligence. However, there is no mention of any methods. For example, they say tracking the 'effectiveness of the responses' is said to be one of their core features of their human rights due diligence process , but it does not explain how exactly they track the effectiveness of their response. | | | |

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| Heineken Holdings | Food and Beverage | Yes | http://www.theheinekencompany.com/~media/Websites/TheHEINEKENCompany/Downloads/PDF/Sustainability/Empower%20our%20people%20and%20communities/Heineken%20NV%20Employees%20and%20Human%20Rights%20Policy.aspx | Universal Declaration on HR, ILO conventions | General comments that they support and respect various human rights without going further and mentioning any methods of ensuring compliance. | Yes | We will continue to include Employees's and Human Rights Policy questions in our internal Sustainability Survey. In 2015, we will start to develop a due diligence process for selected markets, in close cooperation with the regional teams. In the coming years we will include, in a phased manner, other markets. | | | |
| Shell | Oil and Natural Gas | Yes | http://www.shell.com/global/environment-society/society/human-rights/respecting.html | Guiding Principles, Global Compact, Voluntary Principles on Security and Human Rights | We seek to work with contractors and suppliers who contribute to sustainable development and are economically, environmentally and socially responsible. The Shell Supplier Principles provide a simple and consistent framework of our expectations for all our suppliers. | No | They require integrated environmental, social and health impact assessments to be carried out. They engage with local people who may be affected along with other interested parties. They capture the goals we set in the impact assessment process in a management plan and must implement and track these through the life of the project or operation. Although there is express adhere to the guiding principles, there doesn't seem to be any specific human rights due diligence process that can be distinguishable from normal due diligence process. | | | |
| EcoBank | Finance | No | | | | | | | | |
| Petrotrin | Oil and Natural Gas | No | | | | | | | | |
| Next | Apparel | Yes | http://www.nextplc.co.uk/~media/Files/N/Next-PLC/pdfs/corporate-responsibility-report/cr-2014.pdf | Universal Declaration on HR, ILO conventions | Simply says : Next is committed to upholding all basic human rights and supports in full the United Nations Universal Declaration of Human Rights and the International Labour Organization (ILO) Core Conventions in relation to equal opportunities, freedom of association/collective bargaining, forced labour and child labour. Where Next employees are based in countries with recognised concerns over human and labour rights, as determined by EIRIS for the FTSE4Good Index, all employees are specifically required to comply with the Declaration of Human Rights and the ILO Core Conventions and receive annual training to ensure their understanding of these principles. | No | | | | |
| Burberry Group | Apparel | Yes | http://www.burberryplc.com/documents/corporate_responsibility/burberry-human-rights-policy.pdf | Universal Declaration on HR, ILO conventions, Independent HR Policy Based on Own Business Code, Guiding Principles | We are committed to respecting and safeguarding the human rights of all those lives that Burberry touches; we recognise that our people are our greatest assets and therefore strive to attract talent, provide employee development, recognise performance, ensure a safe working environment and promote employee health and well being. Meanwhile, through Burberry Beyond, the Company's global corporate responsibility programme, Burberry is committed to inspiring sustainable action to make meaningful and lasting improvements to workers' employment and workplace conditions. Finally, Burberry places the highest importance on customer safety, welfare and respect whether that be through the enjoyment of Burberry products or through their engagement experience with the Company in our stores or otherwise. | No | Makes reference to a framework of (a) core standards and (b) reporting and assessment as well as (1) Policies and Tools and their (2) Implementation | | | |
| Barclays Plc. | Finance | Yes | http://www.barclays.com/citizenship/the-way-we-do-business/human-rights.html | Universal Declaration on HR, ILO conventions | We provide internal guidance for lending and relationship managers to include advice on how to integrate human rights issues into their assessment of financial transactions. Using the online human rights guidance tool which we helped to develop in conjunction with other financial institutions participating in the UNEP FI human rights workstream, we provide guidance on: Identifying potential human rights risk in lending and investing, Assessing the materiality of the risk, Identifying possible risk mitigation opportunities. The online tool is embedded into our central risk management policy and guidance. | Yes | When assessing customers' financial propositions generally, and providing financial advice, relationship management should consider any material human rights aspects as part of their due diligence. In particular, it is important that all substantial loans to finance public or private sector projects, corporations or governments are reviewed for potential human rights impacts as part of the assessment/sanctioning process. The undertaking of appropriate human rights due diligence is important in demonstrating adherence to the UN Guiding Principles on business and human rights, and the OECD Guidelines for Multinational Enterprises | | | |
| HSBC | Finance | Yes | http://www.hsbc.com/about-hsbc/procurement | Global Compact, Universal Declaration on HR | Suppliers with whom we have regular and recurring dealings should have management processes in place to ensure compliance with this code. Furthermore, suppliers must make reasonable efforts to monitor and ensure that their supply chain is aware of and compliant with the aims of the code to reduce possible negative attention to the HSBC brand. HSBC reserves the right to randomly review the supplier's policies, procedures or any other document related to the HSBC Code of Conduct. In some cases, HSBC may require an on-site audit of a supplier's adherence to this code. | No | | | | |

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| Lloyds Banking Group | Finance | Yes | http://www.lloydsbankinggroup.com/globalassets/documents/our-responsibility/policies-and-codes/group_human_rights_policy.pdf | Universal Declaration on HR, ILO conventions | The Policy simply states : "In addition to obeying the laws, rules and regulations of every country in which we operate, the Group will respect and support the United Nations, Universal Declaration of Human Rights, together with the International Labour Organisation (ILO) Fundamental Conventions, covering freedom of association, the abolition of forced labour, equality and the elimination of child labour. We will communicate this policy to all our employees, worldwide and provide appropriate training" | No | | | | |
| Royal Bank of Scotland | Finance | Yes | http://www.rbs.com/content/dam/rbs/Documents/Sustainability/RBS-Statement-on-Human-Rights.pdf | Global Compact | Their assess each lending, investment and services decision on an individual basis through their defined risk and credit committee procedures and take into account relevant social, ethical and environmental issues as a part of that process. | Yes | We conduct due diligence on clients relating to human rights standards, and expect our clients to share our commitment to respecting human rights associated with their operations. | | | |
| Standard Chartered | Finance | Yes | http://www.standardchartered.com/templatedata/document/document/data/sustainability/Human_Rights_Policy_Standard_Chartered.pdf | Universal Declaration on HR | We are strictly apolitical and do not engage in political activity, support political parties or have any political affiliations worldwide. We recognise that we have direct responsibility for the impact of our activities on our employees, suppliers, customers and the communities in which we operate. We work to protect human rights in our own operations through our internal policies and procedures. Our policies also ensure that human rights are taken into account in procurement and lending decisions. | No | | | | |
| SAB Miller | Food and Beverage | Yes | http://www.sabmiller.com/docs/default-source/sustainability-documents/position-paper-human-rights.pdf?sfvrsn=2 | Global Compact, Universal Declaration on HR, ILO conventions | Human Rights Principles in the course of existing business and in the assessment and development of new business opportunities. For existing associates and joint ventures, SABMiller will promote the adoption of an approach consistent with the Human Rights Principles. | Yes | In 2012, they launched new toolkits for our businesses to help them to manage and mitigate human rights risks. However, disappointingly, there is no link anywhere on the website to this new toolkit. They have attached an interactive graph that shows a stairway of different level of human rights compliance in different countries. But there is no mention of their assessment criteria? They conducted a review after adhering to the Ruggie principles. Their review demonstrated that there was a need to tighten the stairways. The level 1 minimum standards have been strengthened to ensure sufficient due diligence is in place. For example, the enterprise development stairway now requires all new supplier contracts to reference the Group Responsible Sourcing Principles. The fact that they gave an example of what changes were brought about is noteworthy. Their future plans also seem to take into account the need for human rights due diligence. They plan to: Have 200 of our highest risk suppliers independently audited for social and ethical compliance, Launch our updated Supplier Code of Conduct and Responsible Sourcing Standards Continue our engagement with AIM-PROGRESS to build our procurement function and supplier capability. But this is all that is said, without further explain of how they | | | |

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| Unilever | Food and Beverage | Yes | http://www.unilever.com/sustainable-living-2014/enhancing-livelihoods/fairness-in-the-workplace/advancing-human-rights-across-our-operations/ | Guiding Principles , Universal Declaration on HR, ILO conventions | Our approach is to uphold and promote human rights in three ways: in our operations by upholding our values and standards in our relationships with our suppliers and other business partners | No | A 24-hour toll-free 'ethics hotline' number is available in countries for individuals who wish to raise concerns in relation to the Code, on an anonymous basis if they. Potential breaches of our Code of Business Principles can also be reported either internally to members of local leadership Grievances can be raised with either line managers or Human Resources business partners Details of Code cases are reported each quarter to the Unilever Leadership Executive. This procedure is simply reflective of normal business practice. The fact that procedure relates to breaches of its code of business principles emphasis how this procedure is not specific to human rights due diligence. A 24-hour toll-free 'ethics hotline' number is available in countries for individuals who wish to raise concerns in relation to the Code, on an anonymous basis if they. Potential breaches of our Code of Business Principles can also be reported either internally to members of local leadership Grievances can be raised with either line managers or Human Resources business partners Details of Code cases are reported each quarter to the Unilever Leadership Executive. This procedure is simply reflective of normal business practice. The fact that procedure relates to breaches of its code of business | | | |
| Associated British Foods | Food and Beverage | Yes | http://www.abf.co.uk/responsibility/our-crinciples/behaviour/associated-british-food-plc-%E2%80%99s-commitment-to-human-rights | Global Compact, Universal Declaration on HR, ILO conventions | We believe that responsibility to our people is fundamental to our responsibility as a business. Our commitment to respect human rights is founded in a strong ethos of workplace safety and employee wellbeing, and is supported by our commitment to ensure compliance with the UN Declaration on Human Rights. Our commitment spans our duty to be responsible for our people, be a responsible neighbour and also to be responsible stewards of our environment. | No | Where an incident or suspected incident of human rights abuse is brought to our attention (through our own internal systems or third-party communication), Associated British Foods plc is committed to undertaking a comprehensive investigation to identify the root cause. This may involve the co-operation of third-parties (for example NGOs, trade unions and local charities). We will then ensure that the appropriate remediation takes place not only to correct the issue uncovered, but also to mitigate the risk of recurrence, taking into consideration local and national law where such an incident occurs in our supply chain. | | | |
| Anglo American | Mining | Yes | http://www.angloamerican.com/-/media/Files/A/Anglo-American-PLC-V2/documents/approach-and-policies/social/hr-policy-document-english.pdf | Guiding Principles , Global Compact, Universal Declaration on HR, ILO conventions, Voluntary Principles on Security and Human Rights | We commit to address both adverse human rights risks and impacts and to contribute positively to an enabling environment for human rights to be respected. We are also committed to paying special attention to the rights of potentially vulnerable groups. | Yes | We accept and support the corporate responsibility to respect human rights and actively seek to avoid involvement with human rights abuses. We aim to identify, assess and minimise potential adverse human rights impacts that we cause or contribute to, or that are linked to our business, through on-going due diligence and appropriate management, as stated in the UN Guiding Principles on Business and Human Rights. We also recognise that our host governments have a duty to protect the human rights of everyone within their jurisdiction and, where appropriate, we will work with states to build capacity in support of that objective /... / As part of our commitment to respect human rights and to a comprehensive approach, we will also undertake appropriate due diligence throughout the lifecycle of mining operations. | | | |

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| Rio Tinto | Mining | Yes | http://www.riotinto.com/our-commitment/human-rights-4800.aspx | Guiding Principles , Global Compact, Voluntary Principles on Security and Human Rights, Universal Declaration on HR, ILO conventions | Our Human rights policy and procedures are supported by a training package. This includes both general and more targeted programmes, delivered online and in person where appropriate. Targeted training to date has included projects and operations in the Democratic Republic of the Congo, Guinea, Mongolia and Madagascar. We integrate human rights into our risk analysis and impact assessment processes. And if we believe the risks justify it, we carry out standalone human rights risk analyses and impact assessments – and draw on external expertise. | Yes | Human rights due diligence include: Identify key human rights exposures based on the political, cultural and social context. Identify all vulnerable and 'at risk' groups. Engage with them inclusively at all stages. Review knowledge base on human rights-related country risk (available from External Affairs, including internal Prospect portal) and apply recommendations, according to project scope. Consider commissioning targeted country risk assessment. Use the project risk analysis process to consider the need for a comprehensive human rights risk analysis. | | | |
| Lonmin | Mining | Yes | http://sd-report.lonmin.com/2013/capitals/human-social/human-rights | Universal Declaration on HR, ILO conventions, Voluntary Principles on Security and Human Rights, Global Compact | Our Human Rights Policy was developed in 2009 and in line with these principles to assist the Company in its goal of upholding international human rights through all of its dealings and operations. The policy applies to all employees, contractors, suppliers and business partners. We record and report any credible allegations of human rights abuses, by public or private security, within our area of operations to the appropriate authorities. We undertake to monitor investigations to completion; and ensure actions are taken to prevent reoccurrences. | No | | | | |
| Tullow Oil | Oil and Natural Gas | Yes | http://www.tullowoil.com/Media/docs/default-source/7_suppliers/tullow-human-rights-naliru-nif2cfurena?naluks-nif2cfurena? | Global Compact | We conduct Environmental and Social Impact Assessments and community consultation processes to identify potential human rights group's concerns and examine ways to proactively address them. No further explanation. | No | | | | |
| BG Group | Oil and Natural Gas | Yes | http://www.bg-group.com/index.asp?pageid=54 | Guiding Principles , Global Compact, Universal Declaration on HR, ILO conventions, Voluntary Principles on Security and Human Rights | We have a risk-based approach to human rights, assessing the risk in the countries where we work rather than adopting a standard approach. This allows us to put in place measures that are proportionate to the risk | No | Our Contracts and Procurement Standard, which covers how we source, award, supervise and monitor contracts - including vetting of contractor companies - sets out our approach to identifying and mitigating human rights risk and other HSE and ethical risks. All suppliers are reviewed regularly, typically on a quarterly basis, to monitor ethical conduct and human rights risks. Any supplier 'red flagged' through this review process may not be used further unless the relevant contracts and procurement manager or local compliance officer have reviewed the risk, performed any necessary ethical conduct and human rights assessment and, where required, put in place appropriate mitigation measures. This is the only method given on the website. It is not very substantial either | | | |
| BP | Oil and Natural Gas | Yes | http://www.bp.com/en/global/corporate/sustainability/society/human-rights.html | Guiding Principles , Global Compact, Universal Declaration on HR, ILO conventions, Voluntary Principles on Security and Human Rights | Managing human rights issues has implications for the way we manage our supply chains. We expect our suppliers and contractors to act consistently with our code of conduct, which outlines our requirements that no forced or child labour will be used. Non-conformance with this may ultimately result in termination of contract. | No | As part of their work towards alignment with the UN Guiding Principles, they have developed a plan to update their upstream procurement and supply chain management processes and practices with further human rights considerations. These include human rights risk assessment, due diligence and verification. However, no further explanation is given regarding any methods of assessment. Without giving methods, it currently seems like a very weak human rights due diligence process. | | | |
| Nike | Apparel | Yes | http://www.nikeresponsibility.com/#report/ty04_cr_report | | | | | | | |
| Levi Strauss | Apparel | No | | | | | | | | |
| Ralph Lauren | Apparel | No | | | | | | | | |
| Patagonia | Apparel | No | | | | | | | | |
| Wal-Mart | Apparel | No | | | | | | | | |
| VF Corp | Apparel | No | | | | | | | | |
| Limited Brands | Apparel | No | | | | | | | | |

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| Gap | Apparel | Yes | http://www.gapinc.com/content/dam/csr/documents/HumanRightsPolicy_FINAL.pdf | Guiding Principles , Global Compact, Universal Declaration on HR, ILO conventions | Gap Inc. is committed to developing a culture which implements a policy of respect and support for internationally recognized human rights and seeks to avoid complicity in human rights abuses | No | To ensure our respect of human rights, we endeavor to conduct reasonable due diligence to become aware of, prevent and address the adverse human rights impacts of our apparel supply chain and our Operations and to provide reasonable disclosure of our efforts in a manner that is both usable by interested stakeholders and cost-effective. However, no further information regarding any procedure or methods of carrying out human rights specific due diligence. NOTE: Overall questions related to human rights policy should be directed to Kindley Walsh Lawlor, Vice President of Social and Environmental Responsibility, via social_responsibility@gap.com. None of the other companies have taken the initiative to specially name a contact in case the public have any queries | | | | |
| Nordstrom | Apparel | No | | | | | | | | | |
| ROSS | Apparel | Yes | http://www.rossstores.com/docs/ProductSourcingHumanRights.pdf | Independent HR Policy Based on Own Business Code | Vendors, manufacturers and other business partners of the Company are required to comply with all applicable federal, state, local and international laws relating to the manufacture and production of products sold to Ross, including compliance with all applicable laws relating to labor compensation, working conditions, child, slave, prison or forced labor, environmental protection, product safety, corruption or bribery (including foreign corrupt practices) and similar laws. | | | | | | |
| PVH Corp | Apparel | Yes | http://www.pvhcsr.com/csr2013/content/pdf/csr_2013_full_report.pdf | Universal Declaration on HR, ILO conventions | Our code also reflects our commitment to and alignment with the United Nations Guiding Principles for Business and Human Rights. These principles are: the Stated Duty to Protect against human rights abuses by third parties, including business; the Corporate Responsibility to Respect human rights; and the need for Effective Access to Remedies. | Yes | The web space dedicated to giving information about human rights is noteworthy but the actually content itself is not specific to human rights but about wider social concerns. However their stakeholder engagement dedication is noteworthy. | | | | |
| Foot Locker | Apparel | Yes | http://www.footlocker.eu/ns/documents/EN_Cobc_2011_suppliers.pdf | | Foot Locker expects its Business Partners to share its commitment to human rights and equal opportunity in the workplace. Foot Locker's Business Partners shall conduct their employment practices in full compliance with all applicable laws and regulations | No | | | | | |
| Bank of America | Finance | Yes | http://about.bankofamerica.com/assets/pdf/human_rights_statement_2014.pdf | Universal Declaration on HR, ILO conventions | Bank of America supports fundamental human rights and demonstrates leadership in responsible workplace practices across our enterprise and in all regions where we conduct business. While national government's bear the primary responsibility for upholding human rights, our company policies and practices promote and protect human rights, and we strive to conduct our business in a manner consistent with the United Nations Universal Declaration of Human Rights and the International Labor Organization's Fundamental Conventions. Our commitment to fair, ethical and responsible business practices, as we engage with our employees, clients, vendors and communities around the world, is embodied in our values | No | | | | | |
| Citigroup | Finance | Yes | http://www.citigroup.com/citizencitizen/data/citi_statement_on_human_rights.pdf | Guiding Principles , Universal Declaration on HR, ILO conventions | We are mindful of our many points of influence on human rights across our value chain, We are also aware of the need to continually assess human rights risks and opportunities, and of the special Representative's assertion that companies must "know and show" — must know what their human rights risks are, and must show what they are doing to mitigate such risks through due diligence. | Yes | Citi has developed internal policies such as the Environmental and Social Risk Management (ESRM) Policy, which contains environmental and social standards including the Equator Principles and is an important component of our human rights approach. The ESRM Policy contains certain human rights due diligence requirements that are consistent with the due diligence framework set forth in the UN Guiding Principles. | | | | |
| Export-Import Bank of the United States | Finance | Yes | http://www.exim.gov/about/library/reports/competitivenessreports/upload/Ex-Im-Bank-2013-Competitiveness-Report-to-Congress-Complete.pdf | Global Compact, Universal Declaration on HR | Ex-Im Bank periodically receives a list of countries where the State Department has found no "consistent pattern of gross violations of internationally recognized human rights." Where a proposed transaction over \$10 million involves goods or services to be exported to a country that has not received "pre-clearance" on such list, Ex-Im Bank refers the transaction to the State Department for human rights review. In addition, Ex-Im Bank country economists may work in concert with the State Department to, where appropriate, examine human rights and other foreign policy considerations in their assessment of the risks associated with transactions in specific countries | Yes | Mentions the term once (in a footnotes) and says "The Common Approaches were revised in June 2012 to include human rights due diligence as the "Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence. " While legally non-binding, the Common Approaches expresses the common position or will of the whole OECD memberships and therefore entails important political commitment for Member governments" | | | | |

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| J.P. Morgan Chase | Finance | Yes | http://www.jpmorganchase.com/corporate/Corporate-Responsibility/human-rights.htm | Universal Declaration on HR | general comments such as: They seek to engage with suppliers whose values and business principles are consistent with their own and through their procurement policies and standards seek to encourage behaviour by their suppliers that is consistent with the principles set forth in this Human Rights Statement. JPMorgan Chase is committed to respecting the human rights of their employees through their internal employment policies and practices, such as their Global Privacy Policy, which protects the personal information of employees and their health, family care and diversity plans and programs. Environmental and Social Risk Assessment Policy – which is basically based on the Equator Principles | No | | | | | |
| Wells Fargo Bank | Finance | Yes | https://www.wellsfargo.com/about/corporate/human-rights-statement | Independent HR Policy Based on Own Business Code | simply states : Wells Fargo's ongoing respect for human rights reflects our vision and values. We recognize that respecting human rights is a continuing effort, and we must regularly assess our practices and approaches in light of changing global policies and business practices. This effort is done with the understanding that in some circumstances we may go above and beyond what the law and industry standards require. We are dedicated to corporate social responsibility and strive to uphold human rights in all our business activities | | | | | | |
| Berkshire Hathaway | Finance | No | | | | | | | | | |
| Goldman Sachs | Finance | Yes | http://www.goldmansachs.com/investor-relations/corporate-governance/corporate-documents/human-rights-statement.pdf | Universal Declaration on HR | The Firm analyzes new and existing clients for a wide array of possible human rights-related issues, including labor practices, impacts on indigenous peoples, and proximity to conflict regions. This process informs their business decisions. They also engage with their clients in certain cases, encouraging them to consider adopting more sustainable practices and to take human rights issues into consideration in conducting their business. does not really mention a specific method. | | | | | | |
| Coca-Cola | Food and Beverage | Yes | http://www.coca-colacompany.com/our-company/human-rights-statement | Guiding Principles , Universal Declaration on HR, ILO conventions | We are committed to earning that trust with a set of values that represent the highest standards of quality, integrity and excellence. Our Human Rights Statement establishes a foundation for managing our business around the world in accordance with these high standards | Ambiguous | The Coca-Cola Company respects human rights. It is committed to identify, prevent, and mitigate adverse human rights impacts resulting from or caused by our business activities before or if they occur through human rights due diligence and mitigation processes | | | | |
| Pepsico | Food and Beverage | Yes | http://www.pepsico.com/Purpose/Talent-Sustainability/Human-Rights | Global Compact | Simple comments such as :PepsiCo respects the dignity of our workers in the workplace and we work to ensure our associates' rights to personal security, a safe, clean and healthful workplace, and freedom from harassment or abuse of any kind. We deal fairly and honestly with our associates regarding wages, benefits and other conditions of employment, and recognize our associates' right to freedom of association. We do not use forced or child labor | No | | | | | |
| Kraft Foods | Food and Beverage | Yes | http://www.kraftfoodsgroup.com/deliciousworld/compliance-integrity/kraftfoods_statement_human_rights.aspx | Global Compact | Their corporate Code of Conduct sets out 10 rules that guide everything they do. The third rule states that employees will "Treat People Fairly." They implement the code through detailed policies that provide guidelines for their employees in certain areas. In addition, they have a robust Compliance and Integrity Program to help us train and monitor in these areas. Using announced third-party audits, we've begun to assess direct suppliers' compliance with our corporate responsibility expectations (including child and forced labor) through AIM-PROGRESS. | No | | | | | |
| Mars | Food and Beverage | Yes | http://www.mars.com/global/press-center/human-rights.aspx | ILO conventions | It is the duty of governments to protect and fulfil human rights. As a private company, we will respect and promote human rights in our value chain, starting with areas where we have greatest control and influence, and where we can have the greatest impact. | Ambiguous | In accordance with the UN Guiding Principles, we will implement a due diligence process to identify, mitigate and prevent adverse impacts on human rights and appropriate mechanisms for remediation | | | | |
| Tyson Foods | Food and Beverage | Yes | http://www.tysonfoods.com/Sustainability/Report-Sections/Section-3/3_2.aspx | Independent HR Policy Based on Own Business Code | very general recognition of human rights. No mention of any methods. | No | | | | | |
| General Mills | Food and Beverage | Yes | http://www.generalmills.com/en/Responsibility/Sourcing/responsible_sourcing.aspx | Global Compact, ILO conventions | They have a Workplace Standard and Ethical Sourcing Policy and a Code of Conduct in place so their employees understand and act in accordance with these protocols in all areas, including employee health and safety, labor standards, environmental protection, and anti-corruption. Further, they have a Supplier Code of Conduct that covers their expectations of their suppliers in these important areas. They also employ Third party auditors. | | Guided by the 1998 Declaration, General Mills respects the principles of collective bargaining and freedom of association, and prohibition of discrimination, child labor and forced labor – including that associated with human trafficking. A third-party auditing program helps ensure remediation should we find or become aware of violations. All instances of noncompliance related to our audited suppliers in fiscal 2012 are either resolved or are actively being addressed in an | | | | |

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| Kellogg | Food and Beverage | Yes | http://www.kelloggcorporateresponsibility.com/marketplace/responsible-sourcing/sourcing-premiums-responsibly | Independent HR Policy Based on Own Business Code | Their work in partnership with their suppliers to encourage further improvement. Their share the results of any third-party audits and expect a full corrective action plan within 14 days. In 2012, their continued their engagement with AIM-PROGRESS, a forum for global consumer goods companies that are committed to responsible sourcing, to develop standard supplier code of conduct provisions. Since many of the forum's member companies use the same suppliers, using common responsible sourcing provisions should reduce the administrative and operational burden on suppliers to comply. | No | Have a Code of Ethics: http://www.kelloggcompany.com/content/dam/kelloggcompanyus/PDF/KGlobalCodeofEthics.pdf | | | |
| Mondelez | Food and Beverage | Yes | http://www.mondelezinternational.com/about-us/compliance-and-integrity#humanRights | Independent HR Policy Based on Own Business Code | General comments such as : We want to work with suppliers whose own standards of conduct align with ours. However, there is no mention of how they ensure these expectation from suppliers are complied with or measured. | No | | | | |
| Newmont | Mining | Yes | http://sustainabilityreport.newmont.com/community-human.php | Global Compact, Universal Declaration on HR, Guiding Principles , Voluntary Principles on Security and Human Rights | They have a dedicated section of the website that explains how they ensure human rights is not violated within the communities they work in . | No | say: Newmont recognizes that all communities have a fundamental right to preserve their culture and heritage. We aim to engage early and often with communities to identify, protect and manage sites with cultural or heritage significance to local stakeholders. Our approach also includes standards and processes to avoid infringement of human rights related to water use, indigenous Peoples and resettlement and land use. At the site level, our operations offer a range of human rights training programs tailored to local needs. These programs may include cross-cultural awareness; bullying, security and human rights risks; and general information on human rights. | | | |
| Freeport McMoRan | Mining | Yes | http://www.fcx.com/sd/security/index.htm | Voluntary Principles on Security and Human Rights, Universal Declaration on HR, Guiding Principles | In 2013, we advanced our work to integrate the UN Guiding Principles on Business and Human Rights into our existing human rights program. We contracted a UK-based advisory firm to assist us with a corporate-level human rights impact assessment to identify potential impacts across our portfolio and assess opportunities for further due diligence at the operating level using a risk-based approach (see topic dashboard below). As part of the assessment, we conducted two international stakeholder verification meetings with more than 20 entities to receive input on the assessment's methodology and presented initial findings. We plan to complete the assessment in 2014 and use the findings to inform a review of our human rights policy and strategy. | No | However make reference to HRIA: "Our preliminary findings from the human rights impact assessment illustrated that our greatest potential impacts globally are related to environmental and community issues, and our greatest actual and perceived impacts are related to community and employee issues. This high-level assessment will help us prioritize areas of focus as well as identify operations where more in-depth assessments would be beneficial. The tool allowed us to identify that both for potential and actual impacts, our TFM operation is our highest ranking site, followed by our PTFI operation; both findings are in alignment with stakeholder views." | | | |
| Alcoa | Mining | Yes | http://www.alcoa.com/global/en/about_alcoa/human_rights.asp | Global Compact | One of our key challenges regarding human rights is ensuring our policy is integrated throughout our global operations, and we have created numerous methods to first instill compliance and then identify incidents of non-compliance | No | | | | |
| Chevron | Oil and Natural Gas | Yes | http://www.chevron.com/globalissues/humanrights/ | Independent HR Policy Based on Own Business Code | No further explanation apart from :To support the implementation of the policy, Chevron deployed an updated human rights training program. We added the Human Rights Policy to our Business Conduct and Ethics Code compliance training for all employees, and provided enhanced training to employees responsible for security, supply chain management and community engagement. We included human rights expectations and requirements in new contracts with key suppliers and security providers. Chevron also developed and deployed new corporate tools to improve our assessments of the potential impact of projects, our engagement with business suppliers and our management of potential human rights issues in our operations | No | | | | |
| Marathon Oil | Oil and Natural Gas | Yes | http://www.marathonoil.com/Social_Responsibility/Reporting/2013_CSR_Report/Society/Security_and_Human_Rights/ | Universal Declaration on HR, Voluntary Principles on Security and Human Rights | | No | | | | |

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| OXY | Oil and Natural Gas | Yes | http://www.oxy.com/SocialResponsibility/Human-Rights/Pages/Human-Rights-Policy.aspx | Universal Declaration on HR, ILO conventions, Voluntary Principles on Security and Human Rights | Brief method: The Chief Compliance Officer periodically shall conduct a review to verify that the processes contemplated by this Human Rights Policy are in place and, following each such review, shall make a certification on that subject to the Committee of the Board of Directors responsible for oversight of this Human Rights Policy. Occidental shall include information on its public website about this Human Rights Policy, the Human Rights documents referred to herein and its actions in implementing this Human Rights Policy. Occidental may seek independent verification at any time in any manner the Committee of the Board of Directors responsible for oversight of this Human Rights Policy deems appropriate. | No | | | | |
| ExxonMobil | Oil and Natural Gas | Yes | http://corporate.exxonmobil.com/en/community/human-rights/recent-riahs | Guiding Principles , ILO conventions | Human rights are fundamental to society; ExxonMobil strives to respect human rights everywhere we operate through training and compliance with guideline principles. | No | Mostly dealing with workplace issues | | | |
| Hess | Oil and Natural Gas | Yes | http://www.hess.com/sustainability/communities-social-performance/human-rights | Global Compact, Universal Declaration on HR, ILO conventions, Voluntary Principles on Security and Human Rights | The HRRRA process is comprised of three stages. The first stage entails country specific reviews of U.S. State Department reports and information published by the international human rights community and the mainstream media; assessment of company specific activities related to implementation of the voluntary initiatives; and benchmarking the practices of other companies in relation to specific countries. The second stage includes in-country fact finding through site visits and discussions with senior country managers, security personnel, local government and nongovernmental organizations, community members and other stakeholders. The third stage documents the findings from the first two stages and recommends next steps. | Ambiguous | We respect the rights of the communities where we operate, including indigenous peoples, and conduct appropriate due diligence. We believe that early, proactive stakeholder consultation is beneficial to both the company and the community and makes for high-impact, sustainable outcomes. | | | |
| Hunt | Oil and Natural Gas | No | | | | | | | | |
| ConocoPhillips | Oil and Natural Gas | Yes | http://www.conocophillips.com/sustainable-development/our-approach/living-by-our-principles/positions/Pages/human-rights.aspx | Universal Declaration on HR, ILO conventions, Voluntary Principles on Security and Human Rights | Simply states : The company has performed a high-level human rights risk assessment (by country) of its global operations using externally provided human rights risk assessment tools to identify countries of focus for deeper level evaluation of potential human rights issues. Key areas include: security and human rights; land use/relocation; indigenous issues and rights; company and supplier labor standards; access to water; and vulnerable groups | Yes | Have a dedicated webpage on HRDD. However the page does not explain the processes and tools in detail | | | |
| Noble Energy | Oil and Natural Gas | Yes | http://www.nobleenergyinc.com/2012sr/csr-policy.html | | They do not have a HR Policy. Their CSR Policy is a general brief statement about what they recognise and their commitment. | No | | | | |
| Phillips 66 | Oil and Natural Gas | Ambiguous | http://www.phillips66.com/EN/susdev/ethics/human_rights/Pages/index.aspx | | | | | | | |
| Google | Technology | No | | | | | | | | |
| Apple | Technology | Yes | http://www.apple.com/uk/supplier-responsibility/labor-and-human-rights/ | Independent HR Policy Based on Own Business Code | This company is noteworthy. It sets out methods as well as how they fixed the violations. For example : In 2013, we audited deeper in our supply chain than ever and conducted 451 audits of supplier facilities that collectively employ nearly 1.5 million workers. Those audits uncovered 23 workers who were underage when hired — significantly fewer than the previous year. As part of our Underage Labour Remediation Programme, suppliers found violating underage worker rules must return underage workers to school, finance their education at a school chosen by their families, and continue providing income to the workers matching what they received while employed. We follow up regularly to ensure that the workers remain at school and that suppliers continue to uphold their financial commitment. | No | | | | |

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| Microsoft | Technology | Yes | http://www.microsoft.com/en-gb/about/working-responsibly/human-rights | Guiding Principles , Global Compact, Universal Declaration on HR, ILO conventions | Microsoft recognizes that as a leading technology provider with global operations, our business can help to promote - or be used to impede - human rights. We accept the important responsibility we have to respect human rights and we aim to bring the power of technology to bear to promote respect for human rights throughout the world. | No | Microsoft and other stakeholders formed the EICC to enable and encourage electronic manufacturers, software companies, ICT firms and manufacturing service providers to progress towards a vision of a global electronics industry supply chain that consistently operates with social, environmental and economic responsibility. This seems to be setting up a structure for human rights due diligence however further explanation as to how Microsoft itself utilises it would have been useful. To best respect human rights, they regularly review and update their relevant policies, processes and management systems. They also regularly review and strengthen anonymous grievance reporting mechanisms that allow they employees and others affected by they operations to report suspected incidents of human rights abuse. This is clearly very vague in terms of setting out their procedure. | | | |
| HP | Technology | Yes | http://www8.hp.com/us/en/hp-information/global-citizenship/society/humanrights.html?jumpid=reg_r1002_us_en_c-001_title_r0001 | Guiding Principles , Global Compact, Universal Declaration on HR | In 2013, we completed the first human rights risk assessment across our value chain. This covered our own operations, as well as our suppliers, partners, contractors, and the sale and use of our products. The most frequent risk we identified was protecting the legitimate right to privacy of our customers, partners, and employees. Rapid advances in technology and business models are outpacing governments' ability to agree on how to regulate the growing data industry. Companies therefore can't rely simply on compliance to ensure privacy. We must also exercise ethics and social responsibility to protect the personal information of people who put their trust in us. HP is well prepared for this risk. We are recognized as an industry leader for our comprehensive privacy program. The second biggest risk area our assessment uncovered was labor practices in IT supply chains. Issues like employee health and safety and excessive working hours at electronics factories are persistent challenges, which we are aggressively targeting as part of our supply chain responsibility efforts. In 2013, we added a human rights module to our Standards of Business Conduct annual refresher training, taken by 99.7% of active employees. | No | During 2011 they reviewed and enhanced their Global Human Rights Policy and strengthened HP's internal governance for managing human rights issues. They emphasise that they have reviewed their policies but information regarding what action or methods were implements is lacking. They conducted due diligence on their supply chains however, it is not made clear that its human rights specific, it seems more general. In 2012, Building on earlier third-party assessments, HP developed a human rights risk assessment process tailored to their operations and potential human rights risks. They plan to conduct assessments annually to continually improve their understanding of human rights risks in our various business operations. However, no further explanation as to what their assessment criteria involve is given. | | | |
| Yahoo! | Technology | No | | | | | | | | |
| IBM | Technology | No | | | | | | | | |
| Intel | Technology | Yes | http://www.intel.co.uk/content/www/uk/en/policy/policy-human-rights.html?wapkw=human+rights | Guiding Principles , Global Compact, Universal Declaration on HR, ILO conventions | We are committed to maintaining and improving systems and processes to avoid complicity in human right violations related to our own operations, our supply chain, and our products. We regularly assess human rights-related risks and potential impacts, review our policies and management processes, and seek input from stakeholders on our approach. We also support the advancement of human rights through our global efforts to help bridge the digital divide, expand education access, promote social innovation, and improve conditions in our supply chain. | No | Intel has established an integrated approach to managing human rights across our business. In addition to board-level oversight and senior-level Management Review Committees, teams within our Legal and Corporate Affairs, Human Resources, Supply Chain, and Product Development organizations are responsible for conducting due diligence and implementing policies and procedures to support our adherence to the following principles. The page then sets out their principles (e.g they are against child labour) but does not clarify any methods used to seek out any non-compliance with these rights | | | |
| Oracle | Technology | Yes | http://www.oracle.com/us/industries/financial-services/financial-br-policy-1974851.pdf | Independent HR Policy Based on Own Business Code | simply states : Shall ensure that the laws relating to Human Rights especially relating to child labor are followed not only by Oracle but also by the suppliers who supply goods and services to Oracle | No | | | | |

