

2015 Global Compact Communication On Progress - Advanced
(2014 data)



Self-assessment questions

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

Yes/No	Yes (see appendix)
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2. How is the accuracy and completeness of information in your COP assessed by a credible third-party?

Best practice	Company's answer
Planes and described evaluation in the COP	No
Multiple stakeholders focus group	No
Panel of peers	Yes
Independent assurers	Yes - checked by Statutory auditors
Panel of stakeholders	No
Other best practice	No

3. Your COP incorporates the following high standards of transparency and disclosure :

Best practice	
Applies the GRI Sustainability Reporting Guidelines	Yes (in part)
Qualifies for level B or higher of the GRI G3 or G3.1 application levels	No
Be compliant with the option "exhaustive criteria" of GRI4	No
Be compliant with the option "essential criteria" of GRI4	No
Provides information on the company's profile and context of operation	Yes - several indicators and operational context in registration document and CSR Report

I. Implementing the Ten Principles into Strategies & Operations

Critère 1 : La COP décrit l'intégration dans les fonctions stratégiques et les unités opérationnelles

Best practice	Reference in the COP
Policies, procedures and activities planned by the company	p. 428
Place responsibility for execution of sustainability strategy in relevant corporate functions	p. 428-429
Align strategies, goals and incentive structures of all business units and subsidiaries with CSR strategy	p. 426-427
Assign responsibility for CSR implementation to an individual or group within each business unit and subsidiary	p. 428
Design corporate sustainability strategy to leverage synergies between and among issue areas and to deal adequately with trade-offs	p. 426
Ensure that different corporate functions coordinate closely to maximize performance and avoid unintended negative impacts	p. 429
Other established or emerging best practices	

Criterion 2: The COP describes value chain implementation

Best practice	Reference in the COP
Policies, procedures and activities planned by the company	p. 435, p. 464
Analyse each segment of the value chain carefully, both upstream and downstream, when mapping risks, opportunities and impacts	p. 426 + Chapter 5 (Risks) page 243 of the 2014 Registration Document in which the COP is inserted
Communicate policies and expectations to suppliers and other relevant business partner	p. 464
Implement monitoring and assurance mechanisms for compliance within the company's sphere of influence	p. 464-465
Undertake awareness-raising, training and other types of capacity building with suppliers and other business partners	p. 434
Other established or emerging best practices	

Robust Human Rights Management Policies & Procedures

Criterion 3: The COP describes robust commitments, strategies or policies in the area of human rights	
Best practice	Reference in the COP
Policies, procedures and activities planned by the company	p. 454, p. 457-458
Commitment to comply with all applicable laws and respect internationally recognized human rights, wherever the company operates	p. 459
Integrated or stand-alone statement of policy expressing commitment to respect and support human rights approved at the most senior level of the company	p.459
Statement of policy stipulating human rights expectations of personnel, business partners and other parties directly linked to operations, products or services	p.459-460
Statement of policy publicly available and communicated internally and externally to all of stakeholders	p.454
Other established or emerging best practices	p. 459
Criterion 4: The COP describes effective management systems to integrate the human rights principles	
Best practice	Reference in the COP
Policies, procedures and activities planned by the company	
Process to ensure that internationally recognized human rights are respected	p. 454
On-going due diligence process that includes an assessment of actual and potential human rights impacts	p. 460
Internal awareness-raising and training on human rights for management and employees	p. 459
Operational-level grievance mechanisms for those potentially impacted by the company's activities	p. 464
Allocation of responsibilities and accountability for addressing human rights impacts	p. 428
Internal decisions-making, budget and oversight for effective responses to human rights impacts	
Processes to provide for or cooperate in the remediation of adverse human rights impacts that the company has caused or contributed	p. 460
Process and programs in place to support human rights through: core business; strategic philanthropic/social investment; public policy engagement/advocacy; partnerships and/or other forms of collective action	p. 435
Other established or emerging best practices	
Criterion 5: The COP describes effective monitoring and evaluation mechanisms of human rights integration	
Best practice	Reference in the COP
Policies, procedures and activities planned by the company	
System to monitor the effectiveness of human rights policies and implementation with quantitative and qualitative metrics, including in the supply chain	p. 473
Monitoring drawn from internal and external feedback	p. 429
Leadership review of monitoring and improvement results	p. 429
Process to deal with incidents the company has caused or contributed to for internal and external stakeholders	p.427
Grievance mechanisms that are legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue	P 95 of the 2014 Registration Document in which the COP is inserted
Outcomes of integration of the human rights principles	
Other established or emerging best practices	p. 353 of the 2014 Registration Document in which the COP is inserted
Robust Labour Management Policies & Procedures	
Criterion 6: The COP describes robust commitments, strategies or policies in the area of labour	
Best practice	Reference in the COP
Policies, procedures and activities planned by the company	p. 454
Reference to principles of relevant international labour standards and the other normative international instruments in company policies	p. 454
Reflection on the relevance of the labour principles for the company	p. 459
Written company policy to obey national labour law, respect principles of the relevant international labour standards in company operations worldwide, and engage in dialogue with representative organization of the workers	p. 425, P. 451
Inclusion of reference to the principles contained in the relevant international labour standards in contracts with suppliers and other relevant business partners	p. 454
Specific commitments and Human Resources policies, in line with national development priorities or decent work priorities in the country of operation	

Participation and leadership in wider efforts by employers' organizations to jointly address challenges related to labour standards in the countries of operation, possibly in a tripartite approach	
Structural engagement with a global union, possibly via a Global Framework Agreement	p. 452
Other established or emerging best practices	
Criterion 7: The COP describes management systems to integrate the labour principles	
Best practice	Reference in the COP
Policies, procedures and activities planned by the company	
Risk and impact assessments in the area of labour	p. 454
Dialogue mechanism with trade unions to regularly discuss and review company progress in addressing labour standards	p. 451
Allocation of responsibilities and accountability within the organization	
Internal awareness-raising and training on the labour principles for management and employees	
Active engagement with suppliers to address labour-related challenges	
Grievance mechanisms, communication channels and other procedures available for workers to report concerns, make suggestions or seek advice, designed and operated in agreement with the representative organization of workers	p. 440
Other established or emerging best practices	
Criterion 8: The COP describes effective monitoring and evaluation mechanisms of labour principles integration	
Best practice	Reference in the COP
Policies, procedures and activities planned by the company	
System to track and measure performance based on standardized performance metrics	p. 393
Dialogues with the representative organization of workers to regularly review progress made and jointly identify priorities for the future	p. 451
Audits or other steps to monitor and improve the working conditions of companies in the supply chain, in line with principles of international labour standards	p. 435
Process to positively engage with the suppliers to address the challenges through schemes to improve workplace practices	p. 429
Outcomes of integration of the Labour principles	
Other established or emerging best practices	
Robust Environmental Management Policies & Procedures	
Criterion 9: The COP describes robust commitments, strategies or policies in the area of environmental stewardship	
Best practice	Reference in the COP
Policies, procedures and activities planned by the company	p. 453
Risks and impact assessment as regard of environment protection	p. 434
Reference to relevant international conventions and other international instruments	p. 428
Reflection on the relevance of environmental stewardship for the company	p. 425
Written company policy on environmental stewardship	p. 428
Inclusion of minimum environmental standards in contracts with suppliers and other relevant business partners	p. 428
Specific ommitments and goals for specified years	p. 427
Other established or emerging best practices	
Criterion 10: The COP describes effective management systems to integrate the environmental principles	
Best practice	Reference in the COP
Policies, procedures and activities planned by the company	
Environmental risk and impact assessments	p. 434
Assessments of lifecycle impact of products, ensuring environmentally sound management policies	p. 436
Allocation of responsibilities and accountability within the organization	p. 428
Internal awareness-raising and training on environmental stewardship for management and employees	p. 465
Grievance mechanisms, communication channels and other procedures for reporting concerns or seeking advice regarding environmental impacts	p. 464
Other established or emerging best practices	
Criterion 11: The COP describes effective monitoring and evaluation mechanism for environmental stewardship	

Best practice	Reference in the COP
Policies, procedures and activities planned by the company	
System to track and measure performance based on standardized performance metrics	p. 428
Leadership review of monitoring and improvement results	p. 428
Process to deal with incidents	
Audits or other steps to monitor and improve the environmental performance of companies in the supply chain	
Outcomes of integration of the environmental principles	p. 467, p. 468
Other established or emerging best practices	
Robust Anti-Corruption Management Policies & Procedures	
Criterion 12: The COP describes robust commitments, strategies or policies in the area of anti-corruption	
Best practice	Reference in the COP
Policies, procedures and activities planned by the company	
Statement of support for legal frameworks against corruption	p. 425
Publicly stated formal policy of zero-tolerance of corruption	p. 425
Commitment to be in compliance with all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes	p. 425
Statement of support for international and regional legal frameworks, such as the convention against corruption	
Detailed policies for high-risk areas of corruption	p. 95 of the 2014 Registration Document in which the COP is inserted
Policy on anti-corruption regarding business partners	p. 95 of the 2014 Registration Document in which the COP is inserted
Other established or emerging best practices	
Criterion 13: The COP describes effective management systems to integrate the anti-corruption principle	
Best practice	Reference in the COP
Policies, procedures and activities planned by the company	p. 94 of the 2014 Registration Document in which the COP is inserted
Carrying out risk assessment of potential areas of corruption	p. 354 of the 2014 Registration Document in which the COP is inserted
Human Resources procedures supporting the anti-corruption commitment or policy, including communication to and training for all employees	p. 440
Internal checks and balances to ensure consistency with the anti-corruption commitment	p. 93 of the 2014 Registration Document in which the COP is inserted
Actions taken to encourage business partners to implement anti-corruption commitment	
Management responsibility and accountability for implementation of the anti-corruption commitment and policy	p. 94 of the 2014 Registration Document in which the COP is inserted
Communications channels and follow-up mechanisms for reporting concerns or seeking advice	p. 95 of the 2014 Registration Document in which the COP is inserted
Internal accounting and auditing procedures related to anti-corruption	p. 97 of the 2014 Registration Document in which the COP is inserted
Other established or emerging best practices	p. 353 of the 2014 Registration Document in which the COP is inserted
Criterion 14: The COP describes effective monitoring and evaluation mechanism for the integration of anti-corruption	
Best practice	Reference in the COP
Policies, procedures and activities planned by the company	
	p. 94 of the 2014 Registration Document in which the COP is inserted
Leadership review of monitoring and improvement results	p. 94 of the 2014 Registration Document in which the COP is inserted
Process to deal with incidents	
Public legal cases regarding corruption	p. 219-220 of the 2014 Registration Document in which the COP is inserted
use of independent external assurance of anti-corruption programmes	
Outcomes of integration of the anti-corruption principle	
Outcomes measures against corruption	
Other established or emerging best practices	
II. Taking Action in Support of broader United Nations Goals and Issues	
Criterion 15: The COP describes core business contributions to United Nations goals and issues	
Best practices	Reference in the COP
Policies, procedures and activities planned by the company	
Align core business strategy with one or more relevant United Nations goals/issues	p. 427

Develop relevant products and services or design business models that contribute to United Nations goals/issues	p. 457 p. 465-466
Adopt and modify operating procedures to maximize contribution to United Nations goals/issues	
Other established or emerging best practices	
Criterion 16: The COP describes strategic social investments and philanthropy	
Best practices	Reference in the COP
Policies, procedures and activities planned by the company	p. 460
Pursue social investments and philanthropic contributions that tie in with the core competencies or operating context of the Group as an integrated part of its CSR strategy	p. 461
Coordinate efforts with other organizations and initiatives to amplify the efforts of other contributors	p. 462
Take responsibility for the intentional and unintentional effects of funding and have due regard for local customs, traditions, religions, and priorities of pertinent individuals and groups	p. 464
Other established or emerging best practices	
Criterion 17: The COP describes advocacy and public policy engagement	
Bonne pratique	Reference in the COP
Policies, procedures and activities planned by the company	
Publicly advocate the importance of action in relation to one or more United Nations goals/ Issues	p. 434
Commit company leaders to participate in key summits, conferences, and other important public policy interactions in relation to one or more United Nations goals/issues	
Other established or emerging best practices	
Criterion 18: The COP describes partnerships and collective action	
Best practices	Reference in the COP
Policies, procedures and activities planned by the company	
Develop and implement partnership projects with public or private organizations on core business, social investments and/or advocacy	p. 456
Join industry peers, United Nations entities and/or other stakeholders in initiatives contributing to solving common challenges and dilemmas at the global and/or local levels with an emphasis on initiatives extending the company's positive impact on its value chain	p. 428
Other established or emerging best practices	
III. Corporate Sustainability Governance and Leadership	
Criterion 19: The COP describes CEO commitment and leadership	
Best practice	Reference in the COP
Policies, procedures and activities planned by the company	
CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the United Nations Global Compact	p. 425
CEO promotes initiatives to enhance sustainability of the company's sector and leads development of industry standards	p. 425, p. 464
CEO leads executive management team in development of corporate sustainability strategy, defining goals and overseeing implementation	p. 426
Make sustainability criteria and United Nations Global Compact principles part of goals and incentive schemes for CEO and executive management team	p. 427
Other established or emerging best practices	
Criterion 20: The COP describes Board adoption and oversight	
Best practice	Reference in the COP
Policies, procedures and activities planned by the company	
Board of Directors assumes responsibility and oversight for long-term corporate sustainability strategy and performance	p. 429
Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability	
Board, where permissible, approves formal reporting on corporate sustainability	
Other established or emerging best practices	p. 429
Criterion 21: The COP describes stakeholder engagement	
Best practice	Reference in the COP
Policies, procedures and activities planned by the company	
Publicly recognize responsibility for the company's impacts on internal and external stakeholders	p. 425
Define sustainability strategies, goals and policies in consultation with key stakeholders	p. 429
Consult stakeholders in dealing with implementation dilemmas and challenges and invite them to take active part in reviewing performance	p. 429
Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect 'whistle-blowers'	p. 429, p. 440
Other established or emerging best practices	p. 434

ANNEX: Business & Peace

Issues for participants who answered 'Yes' to the first question

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

Best practice	Reference in the COP
Policies, procedures and activities planned by the company	p 353 of the 2014 Registration Document in which the COP is inserted
Information on how policies, strategies and operating practices have been adapted to the specific high-risk/conflict context based on due diligence	p. 434, p. 460
Adherence to best practices even where national law sets a lower standard, including in the management of security services	
Management of the supply chain to avoid contributing to conflict through purchasing decisions and practices	
Other established or emerging best practices	p. 353 of the 2014 Registration Document in which the COP is inserted

2. The COP describes policies and practices related to the company's government relations in high-risk or conflict-affected areas

Best practice	Reference in the COP
Policies, procedures and activities planned by the company	p. 460
Assessment of opportunities for constructive engagement with government actors in order to support peace	
Measures undertaken to avoid complicity in human rights violations by government actors	p.400 of the COP 2013
Management practices aimed at preventing corrupt relationship with government officials	p. 425, p. 428, p. 435
Other established or emerging best practices	

3. The COP describes local stakeholder engagement and strategic social investment activities of the company in high-risk or conflict-affected areas

Best practice	Reference in the COP
Policies, procedures and activities planned by the company	
Assessment of opportunities for constructive engagement with government actors in order to support peace	
Stakeholder engagement mechanisms across company and contractor operations	
Approaches to stakeholder engagement involving civil society, international organizations, etc	
Actions toward constructive and peaceful company-community engagement	p. 464
Sustainable social investment project	p. 455
Other established or emerging best practices	